

*Audit Report*

Cross-referred Social Security  
Numbers

**MEMORANDUM**

**Date:** July 17, 2017 **Refer To:**

**To:** The Commissioner

**From:** Acting Inspector General

**Subject:** Cross-referred Social Security Numbers (A-06-13-23091)

The attached final report presents the results of the Office of Audit's review. The objectives were to determine (1) the validity of payments the Social Security Administration issued simultaneously under multiple cross-referred Social Security numbers (SSN) and (2) whether death information input on the Numident record of one SSN was also recorded on the Numident record(s) of the cross-referred SSN(s).

If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, 410-965-9700.

*Gale Stallworth Stone*

Gale Stallworth Stone

Attachment

July 2017

Office of Audit Report Summary

### Objectives

To determine (1) the validity of payments the Social Security Administration (SSA) issued simultaneously under multiple cross-referred Social Security numbers (SSN) and (2) whether death information input on the Numident record of one SSN was also recorded on the Numident record(s) of the cross-referred SSN(s).

### Background

When SSA assigns an SSN, it creates a master record of relevant information about the numberholder in its Numident file. When SSA issues an individual more than one SSN or becomes aware a numberholder has more than one SSN, it cross-refers the SSNs on the Multiple Social Security Number Cross-Reference File so the individual's earnings can be properly credited to his/her earnings record. When SSA becomes aware that SSNs belonging to two different people are cross-referred, it should remove the cross-reference.

SSA should not allow individuals who obtain more than one SSN to simultaneously receive SSA payments under more than one of their assigned SSNs.

### Findings

SSA issued improper payments to individuals under multiple cross-referred SSNs and did not develop a method to ensure death information input on numberholders' Numident records was also input on cross-referred Numident records. Based on our sample results, we estimate that SSA issued approximately \$171 million in improper payments to about 2,000 beneficiaries who had multiple cross-referred SSNs. If the Agency does not correct these errors, we estimate it will improperly issue about \$21.2 million over the next 12 months.

SSA also recorded death information on approximately 2.7 million non-beneficiary numberholders' Numident records but did not input death information on their cross-referred SSNs. As a result, we estimate SSA erroneously excluded more than 2 million deceased numberholders' SSNs from the Death Master File.

### Recommendations

We recommended that SSA determine the feasibility of taking appropriate action to:

- Review all cases where numberholders simultaneously receive payments under cross-referred SSNs; resolve any cases where SSA identifies an individual who receives benefit payments under more than one of his/her properly assigned SSNs; and implement system controls to prevent simultaneous issuance of payments under cross-referred SSNs.
- Review all cases where numberholders receive payments under SSNs that are cross-referred to SSNs that contain the numberholders' death information; implement system controls to ensure death information input on numberholders' Numident records is also input on all the numberholders' cross-referred SSN(s); and add death information to the Numident records of non-beneficiary numberholders whose SSNs are cross-referred to SSNs that contain the numberholders' death information.
- Remove cross-references for SSNs in cases where cross-referred SSNs belong to more than one individual.

SSA agreed with our recommendations.

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## **ABBREVIATIONS**

DMF	Death Master File
MULTX	Multiple Social Security Number Cross-Reference File
OASDI	Old-Age, Survivors and Disability Insurance
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number

## OBJECTIVES

Our objectives were to determine (1) the validity of payments the Social Security Administration (SSA) issued simultaneously under multiple cross-referred Social Security numbers (SSN) and (2) whether death information input on the Numident record of one SSN was also recorded on the Numident record(s) of the cross-referred SSN(s).

## BACKGROUND

When SSA assigns an SSN, it creates a record of relevant information about the numberholder in its Numident file. This information includes, but is not limited to, the numberholder's name, date of birth, place of birth, gender, and parents' names.

As a result of a *Freedom of Information Act*<sup>1</sup> lawsuit,<sup>2</sup> SSA compiles a record of reported deaths known as the Death Master File (DMF). SSA uses Numident death information to create the DMF. SSA provides the DMF to Federal benefit paying agencies to use in preventing payments to deceased individuals. SSA also provides a version of the DMF to the Department of Commerce, which, in turn, sells that data to public and private customers.

SSA does not delete, destroy, rescind, deactivate, or cancel SSNs. Under certain circumstances, SSA may assign an individual more than one SSN. For example, SSA can assign new SSNs to victims of SSN misuse. When SSA assigns multiple SSNs to the same individual, it cross-refers the SSNs on the Multiple Social Security Number Cross-Reference File (MULTX) to ensure the numberholder receives proper credit for all earnings reported on the SSNs. However, SSA should not allow these individuals to simultaneously receive SSA payments under both SSNs. As of November 2015, SSA had cross-referred the SSNs of approximately 4.9 million individuals.

Numberholders can qualify for payments under the Old-Age, Survivors and Disability Insurance (OASDI) and/or Supplemental Security Income (SSI) programs.<sup>3</sup> The OASDI program provides benefits to wage earners and their families in the event the wage earner retires, becomes disabled, or dies. The SSI program provides payments to financially needy individuals who are aged, blind, or disabled.

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<sup>1</sup> 5 U.S.C. § 552.

<sup>2</sup> Perholtz v. Ross, Civ. No. 78-2385 and 78-2386 (U.S. District Court for the District of Columbia 1980).

<sup>3</sup> We use the term "beneficiary" in this report in reference to both OASDI beneficiaries and/or SSI recipients.

In September 2015, we obtained data from 1 MULTX segment that identified approximately 486,000 SSNs that SSA cross-referred to at least 1 other SSN.<sup>4</sup> Our review focused on these records. See Appendix A for additional information on our scope and methodology.

## RESULTS OF REVIEW

SSA issued improper payments to individuals under multiple cross-referred SSNs and did not ensure death information input on numberholders' Numident records was also input on cross-referred Numident records.

We identified more than 5,000 instances<sup>5</sup> where, contrary to Agency policy, SSA appeared to simultaneously issue monthly OASDI benefits and/or SSI payments to individuals under both of their cross-referred SSNs. SSA systems did not automatically identify and consider payments issued under one SSN when determining eligibility for, or computing the benefit amounts paid, under the cross-referred SSN.

Our review of 534 instances from 1 MULTX segment indicated that, in most cases, it appeared the numberholders simultaneously receiving payments under multiple cross-referred SSNs were not the same individuals, and SSA had cross-referred the SSNs in error. However, in about 20 percent of the cases, it appeared SSA had issued both payments to the same individual. Because SSA's systems did not automatically consider payments under one cross-referred SSN when computing payment amounts issued under the second SSN, based on our sample results, we estimate SSA issued approximately \$55.2 million in improper payments to about 1,190 beneficiaries receiving SSA payments under multiple cross-referred SSNs. If the Agency does not correct these errors, we estimate it will improperly issue an additional \$7.5 million over the next 12 months.

We also identified over 13,000 instances<sup>6</sup> where SSA continued paying beneficiaries after it recorded death information on their cross-referred SSNs. Review of 1,487 instances from 1 MULTX segment indicated that most of the individuals receiving the payments were not the same individuals whose death information appeared on the cross-referred SSNs, and SSA had cross-referred the SSNs in error. However, in 6 percent of the cases, it appeared that SSA had assigned both cross-referred SSNs to the same individual. Based on our sample results, we estimate SSA issued about \$115.4 million in improper payments to 930 deceased beneficiaries after it input death information on their cross-referred SSNs. If the Agency does not correct these errors, we estimate it will issue \$13.7 million in additional improper payments over the next 12 months.

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<sup>4</sup> SSA randomly assigns SSNs. SSNs can be categorized into 20 segments, each containing 5 sequential groups consisting of the SSNs' last 2 digits. For example, segment 1 includes all SSNs ending in digits "00" to "04." Each segment is representative of all 20 segments.

<sup>5</sup> This number includes SSNs from all 20 MULTX segments.

<sup>6</sup> This number includes SSNs from all 20 MULTX segments.

Finally, we identified approximately 2.7 million additional instances<sup>7</sup> not involving SSA payments where SSA input death information on a numberholder's Numident record for 1 SSN but did not input the death information on the numberholder's cross-referred SSN(s). A review of data from one MULTX segment indicated that approximately 97 percent of these cross-referred SSNs belonged to the same individuals. Therefore, we estimate SSA had death information for more than 2 million deceased numberholders that it did not input into the Numident. As a result, SSA erroneously excluded more than 2 million deceased numberholders' SSNs from the DMF.

## Beneficiaries Receiving Payments Under Both Cross-referred SSNs

Contrary to Agency policy, SSA allowed a small number of individuals with cross-referred SSNs to simultaneously receive OASDI and/or SSI payments under both cross-referred SSNs. Our review of 1 MULTX segment identified 534 instances where SSA simultaneously issued OASDI benefits and/or SSI payments to beneficiaries under cross-referred SSNs. Our review indicated that, in 415 instances, SSA had cross-referred SSNs issued to 2 different individuals in error. However, in 119 instances, available information indicated the cross-referred SSNs belonged to the same individuals. In most cases, SSA did not consider payments under one cross-referred SSN when it determined payment eligibility or computed payment amounts issued under the second SSN.

### *SSA Not Aware It Issued Payments Under Both Cross-referred SSNs*

In 70 cases, payment records indicated SSA was not aware it issued payments to individuals under both cross-referred SSNs.

- In 43 instances, SSA records indicated it simultaneously issued OASDI benefits to individuals listed as primary beneficiaries on 2 different benefit records. Examples follow.
  - In March 2010, SSA began paying an individual \$967 in monthly retirement benefits. In October 2011, SSA began paying an additional \$958 in monthly retirement benefits based on a second claim filed under the individual's cross-referred SSN. The names and street addresses on these payment records were different; however, both indicated the beneficiaries resided in the same city. Both numberholders listed the same address on SSA documents; and address, driver's license, and vehicle registration information available in public records indicated the numberholders were the same individual. We referred this case to our Office of Investigations. If investigators confirm these numberholders are the same individual, we estimate SSA issued approximately \$48,000 in improper payments on the cross-referred SSN and will issue an additional \$13,000 in improper payments over the next 12 months if SSA does not correct the error.<sup>8</sup>

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<sup>7</sup> This number includes SSNs from all 20 MULTX segments.

<sup>8</sup> We did not ascertain the legitimacy of earnings reported under cross-referred SSNs or consider the effect of combining earnings onto one payment record when making improper payment estimates.

- In June 2008, SSA began paying an individual \$852 in monthly disability benefits. In November 2012, SSA began paying an additional \$657 in monthly disability benefits based on a second claim filed under the individual's cross-referred SSN. Both benefit claim forms listed identical military service dates and contained matching claimant signatures. Payment records indicated SSA terminated monthly benefits paid under the original claim when the numberholder died in January 2017. However, SSA continued issuing monthly benefits under the cross-referred SSN. We referred this case to the beneficiary's servicing field office. SSA confirmed the same individual was using both SSNs and terminated benefits on the second claim in April 2017 but not before issuing approximately \$23,000 in improper payments on the cross-referred SSN.
- In 19 instances, SSA records indicated it simultaneously issued primary or auxiliary benefits to individuals under one SSN and auxiliary benefits under their cross-referred SSN. In these cases, it is possible the individuals were entitled to benefit payments on both benefit records (dual entitlement). However, none of these payment records referenced dual entitlement or indicated SSA was aware it issued benefits to the individuals under two different SSNs.<sup>9</sup>
- In four instances, SSA records indicated it simultaneously issued OASDI payments to individuals under one SSN and SSI payments under their cross-referred SSN. All four instances involved improper payments because SSA did not offset benefits paid under one SSN against payments issued under the cross-referred SSNs. To illustrate, a man with two cross-referred SSNs began receiving SSI payments 1995. In 2010, the man's wife began receiving disability benefits, at which time the man used his second SSN to file for and receive spousal benefits. Although SSA had cross-referred the SSNs,<sup>10</sup> neither payment record reflected the man's concurrent entitlement. As a result, SSA did not offset the man's OASDI benefits against his SSI payments. We referred this matter to the Office of Investigations, which confirmed the man received SSA payments under both SSNs. The Office of Investigations subsequently referred the claim to SSA for administrative action. SSA began offsetting subsequent payments and established a \$25,152 overpayment on the man's SSI record.
- In three instances, SSA records indicated it simultaneously issued SSI payments to individuals under both cross-referred SSNs. To illustrate, an individual who had two cross-referred SSNs began receiving SSI payments in 1993. In August 2010, SSA began issuing SSI payments based on a second claim filed under the man's cross-referred SSN. The Claims File Records Management System revealed that both numberholders listed the same contact person on their SSI applications. In addition, SSA approved both claims based on injuries caused by identical circumstances. Both numberholders provided medical records from the same clinic. Signatures on both claims forms appeared to match. We referred this case to the Office of Investigations. If investigators confirm these numberholders are the same person, SSA issued about \$37,000 in improper payments on the cross-referred SSN and

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<sup>9</sup> Because it is possible these individuals were dually entitled, we did not consider these payments in our improper payment estimate.

<sup>10</sup> Numident records for these SSNs contained different last names and years of birth.

will issue an additional \$8,800 in improper payments over the next 12 months if SSA does not correct this payment error.

- In one case, SSA simultaneously issued retirement benefits to an individual under one SSN and both retirement benefits and SSI payments under the cross-referred SSN. The individual began receiving retirement benefits in 2003. In 2004, SSA approved both retirement and SSI claims filed under the second SSN. The Office of Investigations confirmed the individual was receiving benefits under both SSNs. SSA terminated payments on the second SSN in January 2016. The individual pled guilty to Theft of Government Funds, was sentenced to 3 years' probation, which included 6 months of home confinement, and ordered to make restitution to SSA totaling \$80,459.

### *SSA Aware It Issued Payments Under Cross-referred SSNs*

In 49 cases, payment records indicated that SSA was aware it simultaneously issued payments to individuals under both cross-referred SSNs.

- In 48 instances, concurrent beneficiaries received OASDI benefits under 1 SSN and SSI payments under a cross-referred SSN. In all 48 cases, SSA had electronically linked the individuals' SSI payment records to their OASDI payment records. In 20 cases, SSA correctly computed payments. However, in the other 28 cases, a known system computation error caused SSA to offset the SSI payments using OASDI benefit amounts that were not adjusted to reflect benefit payment increases.<sup>11</sup> To illustrate, in December 2012, SSA was paying a concurrent beneficiary \$477 in OASDI benefits and \$241 in SSI payments under two different SSNs.<sup>12</sup> The payment system froze the OASDI benefit amount in all subsequent unearned income offset computations to the amount of monthly OASDI benefits paid in 2012. Because of this error, SSA had overpaid the individual every month since January 2013. As of January 2017, SSA was overpaying him \$24 in monthly SSI.
- In one case, SSA simultaneously issued OASDI benefits to a dually entitled beneficiary under both cross-referred SSNs. This case did not involve improper payments because SSA electronically linked the payment records, which allowed the payment system to ensure combined payments did not exceed the largest benefit amount payable on either record.

Based on our sample results, we estimate SSA improperly paid approximately \$55.2 million to about 1,190 beneficiaries who were receiving payments under multiple cross-referred SSNs. If

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<sup>11</sup> We discuss this computation error in our September 2009 report, *Supplemental Security Income Overpayments to Concurrent Beneficiaries Resulting from Incorrect Benefit Calculations* (A-06-09-29103).

<sup>12</sup> Under the SSI program, in 2012, each eligible individual living in his/her own household and having no other countable income was provided a maximum monthly \$698 Federal cash payment. SSA reduces SSI payments by the amount of a recipient's countable income, less certain exclusions. SSI recipients can have up to \$20 per month in unearned income without it affecting their SSI payment. SSA considers OASDI benefits as countable unearned income. Monthly unearned income in excess of \$20 results in a dollar-for-dollar reduction in SSI payments.

SSA does not correct these errors, we estimate it will improperly issue about \$7.5 million to the beneficiaries over the next 12 months.

## **Deceased Individuals Receiving Payments Under Cross-referred SSNs**

Our review of 1 MULTX segment identified 1,487 instances where SSA was issuing payments to numberholders although it had previously recorded death information on the numberholders' cross-referred SSNs. Our review indicated that most of the individuals receiving the payments were not the same individuals whose death information appeared on the cross-referred SSNs, and that SSA had cross-referred the SSNs in error. However, in 93 cases, it appeared SSA had assigned both cross-referred SSNs to the same person, which indicated the beneficiaries were deceased.

- In one case, a beneficiary began receiving survivor benefits in September 1983. In November 2012, SSA received and recorded death information on the beneficiary's cross-referred SSN but did not record the death information on or terminate the benefits paid under the other SSN. In May 2016, SSA terminated the benefits and determined it issued \$51,898 in improper payments after the beneficiary's death. In July 2016, SSA recovered \$47,893 from the deceased individual's bank account via the Treasury reclamation process.<sup>13</sup>
- In another case, an SSI recipient died in April 1997. SSA recorded the death information on the recipient's Numident and terminated the SSI payments, but did not record the death information on the cross-referred SSN. In 2011, someone using the cross-referred SSN began receiving SSI payments and spousal retirement benefits. Numident records for both SSNs include the same name, date of birth, and mother's maiden name. We referred this case to the Office of Investigations. If investigators confirm the numberholder is deceased, we estimate SSA issued approximately \$31,000 in improper payments and will issue \$7,000 in additional improper payments over the next 12 months if it does not correct the record.

Based on our sample results, we estimate SSA issued approximately \$115.4 million in improper payments to about 930 deceased beneficiaries after it input death information on their cross-referred SSNs. If the Agency does not correct these errors, we estimate it will improperly issue about \$13.7 million over the next 12 months.

## **Non-beneficiaries with Death Information on Cross-referred SSNs**

SSA did not develop a method to ensure death information input on numberholders' Numident records was also input on cross-referred Numident records. We identified approximately 2.7 million additional SSNs with no death information on the Numident that SSA had cross-referred to deceased numberholders' SSNs. At the time of our review, SSA was not issuing payments under any of the 2.7 million SSNs.

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<sup>13</sup> Treasury uses this process to reclaim Federal benefit payments issued after death.

Our review of randomly selected records from one MULTX segment indicated that approximately 97 percent of these cross-referred SSNs belonged to the same individuals. Based on our sample results, we estimate that SSA had death information for more than 2 million deceased non-beneficiary numberholders that it did not input onto the Numident.

Deceased numberholders whose deaths are not recorded on the Numident will not appear in the DMF. As a result, Federal and private entities that rely on the DMF to detect deaths may not know these individuals are deceased. The missing death information could result in erroneous payments by other Federal agencies that rely on the DMF to detect unreported deaths and could hinder private industry's as well as State and local governments' ability to prevent or detect fraud.

## CONCLUSIONS

We estimate SSA issued approximately \$171 million in improper payments to about 2,000 beneficiaries who had multiple cross-referred SSNs. If the Agency does not correct these errors, we estimate it will improperly issue an additional \$21.2 million over the next 12 months.

In addition, SSA did not ensure that death information input on numberholders' Numident records was also input on the numberholders' cross-referred Numident records. As a result, SSA erroneously excluded more than 2 million deceased numberholders' SSNs from the DMF.

## RECOMMENDATIONS

We recommend that SSA determine the feasibility of taking appropriate action to:

1. Review all cases where numberholders simultaneously receive benefit payments under cross-referred SSNs.
2. Resolve any cases where SSA identifies an individual who receives benefit payments under more than one of his or her own properly assigned SSNs.
3. Implement system controls to prevent simultaneous issuance of payments under cross-referred SSNs.
4. Review all cases where numberholders receive payments under SSNs that are cross-referred to SSNs that contain the numberholders' death information.
5. Implement system controls to ensure death information input on numberholders' Numident records is also input on all the numberholders' cross-referred SSN(s).
6. Add death information to the Numident records of non-beneficiary numberholders whose SSNs are cross-referred to SSNs that contain the numberholders' death information.

7. Remove cross-references to SSNs in cases where cross-referred SSNs belong to more than one individual.

## AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix C.

A handwritten signature in black ink, appearing to read "Rona Lawson".

Rona Lawson  
Assistant Inspector General for Audit

# *APPENDICES*

## **Appendix A – SCOPE AND METHODOLOGY**

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To accomplish our objective, we:

- Reviewed applicable Federal law including sections of the *Social Security Act* and Social Security Administration (SSA) regulations, policies, and procedures.
- Reviewed relevant Office of the Inspector General reports.
- Obtained data, in September 2015, from 1 Multiple Social Security Number (SSN) File (MULTX) segment that identified approximately 486,000 SSNs that SSA had cross-referred to at least 1 other SSN. From these SSNs, we:
  - Identified 534 instances where SSA simultaneously issued Old-Age, Survivors and Disability Insurance (OASDI) benefits and/or Supplemental Security Income (SSI) payments under both cross-referred SSNs. We reviewed SSA payment records, Numident, Claims File Records Management System, and public records to determine whether cross-referred SSNs belonged to the same or different individuals. In each instance where available information indicated the cross-referred SSNs belonged to the same individual, we
    - calculated overpayment amounts as of September 2015 and
    - estimated future improper payments based on amounts paid in October 2015 times 12 months.
  - Identified 247,071 instances where SSNs with death information on the Numident were cross-referred to SSNs with no death information on the Numident. From these instances, we identified
    - 1,487 instances where SSA issued OASDI benefits and/or SSI payments to individuals whose SSNs were cross-referred to SSNs that listed the numberholders' death information on the Numident. We reviewed SSA payment and Numident records to determine whether cross-referred SSNs belonged to the same or different individuals. When available information indicated the cross-referred SSNs belonged to the same individual, we
      - calculated overpayment amounts as of September 2015 and
      - estimated future improper payments based on amounts paid in October 2015 times 12 months.
    - 245,584 instances where an SSN with death information on the Numident is cross-referred to 1 or more SSNs with no death information on the Numident. We randomly selected 100 instances for review. For each sampled instance, we reviewed Numident records to determine whether any SSNs belonged to different individuals.

- Obtained data, in November 2015, from all MULTX segments that identified approximately 4.9 million SSNs that SSA cross-referred to at least 1 other SSN. Using these data, we identified
  - 5,113 instances where SSA simultaneously issued OASDI benefits and/or SSI payments under 2 or more cross-referred SSNs and
  - 2,723,559 instances where SSNs with death information on the Numident were cross-referred to SSNs with no death information on the Numident. In 13,020 instances, SSA issued OASDI benefits and/or SSI payments under 1 of the cross-referred SSNs.

We conducted our audit from July 2016 to February 2017 in Dallas, Texas. We determined the data used for this audit were sufficiently reliable to meet our audit objectives. The entities audited were the field offices and program service centers under the Office of the Deputy Commissioner for Operations and the Offices of Retirement and Survivors Insurance Systems, Disability Systems, and Applications and Supplemental Security Income Systems under the Office of the Deputy Commissioner for Systems. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable base for our findings and conclusions based on our audit objectives.

## Appendix B – SAMPLE RESULTS AND ESTIMATES

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We identified 534 instances where the Social Security Administration (SSA) simultaneously issued Old-Age, Survivors and Disability Insurance (OASDI) benefits and/or Supplemental Security Income (SSI) payments under 2 or more cross-referred Social Security numbers (SSN).<sup>1</sup> We reviewed each instance and determined that, in 119 instances, available documentation indicated that both cross-referred SSNs belonged to the same individual. We calculated improper payments for each sample case, estimated the amount of improper payments that would occur over the next 12 months without corrective action, and multiplied the result by 10<sup>2</sup> to project sample results to all segments.

We also identified 1,487 instances where SSA issued OASDI and/or SSI payments to beneficiaries whose SSNs were cross-referred to SSNs that contained the numberholders' death information. We reviewed each instance and identified 93 beneficiaries who appeared to be deceased (in the remaining cases, it appeared SSA had cross-referred in error SSNs belonging to 2 different individuals). We calculated improper payments for each sample case, estimated the amount of improper payments that would occur over the next 12 months without corrective action, and projected sample results to all segments.

The following tables provide the details of our sample results and projections.

**Table B–1: Individuals with Multiple Cross-referred SSNs Who Had Received Improper Payments**

Description	Sample Results	Estimated to All 20 Segments
Cases	119	1,190
Overpayments	\$5,521,944	\$55,219,440
Estimated Overpayments Over Next 12 Months	\$750,770	\$7,507,700

**Table B–2: Current Pay on One SSN and Deceased on Cross-referred SSN**

Description	Sample Results	Estimated to all 20 Segments
Cases	93	930
Overpayments	\$11,540,213	\$115,402,130
Estimated Overpayments in Next 12 Months	\$1,367,165	\$13,671,650

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<sup>1</sup> All sample results involve instances where at least one of the cross-referred SSNs was in Multiple SSN Cross-Reference File (MULTX) segment four.

<sup>2</sup> Our audit population included all SSNs in MULTX segment 4 that SSA had cross-referred to SSNs in any of the 20 MULTX segments. Because as many as half of the SSNs in our sample could involve SSNs from other segments, we multiplied our sample results by 10 instead of by all 20 segments.

## **Appendix C – AGENCY COMMENTS**

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### **SOCIAL SECURITY**

#### **MEMORANDUM**

Date: July 6, 2017

Refer To: S1J-3

To: Gale S. Stone  
Acting Inspector General

From: Stephanie Hall /s/  
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, “Cross-referred Social Security Numbers”  
(A-06-13-23091)--INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,  
“CROSS-REFERRED SOCIAL SECURITY NUMBERS” (A-06-13-23091)**

**GENERAL COMMENTS**

Over the years we have made, and will continue to make, enhancements to ensure our death data is complete and accurate in order to stop payments when we receive confirmed death reports. As good stewards of taxpayer funds, and to preserve the public's trust in our programs, we remain focused on paying the right benefit, to the right person, at the right time. In doing so, we are committed to protecting the integrity of the Social Security number (SSN) and take seriously our responsibilities to issue an SSN to only those eligible to receive one. In addition, when established criteria are met and it is necessary for us to assign a new SSN to an individual, we cross-refer the SSNs to ensure the individual's earnings are properly credited to his/her earnings record for when they become entitled to benefits.

**OIG Recommendations:**

SSA should determine the feasibility of taking appropriate action to:

**Recommendation 1**

Review all cases where numberholders simultaneously receive benefit payments under cross-referred SSNs.

**Response**

We agree.

**Recommendation 2**

Resolve any cases where SSA identifies an individual who receives benefit payments under more than one of his or her own properly assigned SSNs.

**Response**

We agree.

**Recommendation 3**

Implement system controls to prevent simultaneous issuance of payments under cross-referred SSNs.

**Response**

We agree.

#### **Recommendation 4**

Review all cases where numberholders receive payments under SSNs that are cross-referred to SSNs that contain the numberholders' death information.

#### **Response**

We agree.

#### **Recommendation 5**

Implement system controls to ensure death information input on numberholders' Numident records is also input on all the numberholders' cross-referred SSN(s).

#### **Response**

We agree.

#### **Recommendation 6**

Add death information to the Numident records of non-beneficiary numberholders whose SSNs are cross-referred to SSNs that contain the numberholders' death information.

#### **Response**

We agree.

#### **Recommendation 7**

Remove cross-references to SSNs in cases where cross-referred SSNs belong to more than one individual.

#### **Response**

We agree.

## MISSION

By conducting independent and objective audits, evaluations, and investigations, the Office of the Inspector General (OIG) inspires public confidence in the integrity and security of the Social Security Administration's (SSA) programs and operations and protects them against fraud, waste, and abuse. We provide timely, useful, and reliable information and advice to Administration officials, Congress, and the public.

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