

Audit Report

Multiple Social Security Numbers
Assigned to Non-citizens Using the
Enumeration Beyond Entry Program

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MEMORANDUM

Date: December 17, 2019 **Refer To:**

To: The Commissioner

From: Inspector General

Subject: Multiple Social Security Numbers Assigned to Non-citizens Using the Enumeration Beyond Entry Program (A-08-18-50472)

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The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration's controls prevented the assignment of multiple Social Security numbers (SSN) to non-citizens who applied for SSNs through the Enumeration Beyond Entry process.

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



Gail S. Ennis

Attachment

Multiple Social Security Numbers Assigned to Non-citizens Using the Enumeration Beyond Entry Program

A-08-18-50472



December 2019

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration's (SSA) controls prevented the assignment of multiple Social Security numbers (SSN) to non-citizens who applied for SSNs through the Enumeration Beyond Entry (EBE) process.

Background

In October 2017, the EBE program was created through an agreement between SSA and "... the Department of Homeland Security (DHS) to assist SSA in enumerating certain applicants who: live in the United States, apply for work authorization, and need to obtain a[n] SSN." When an applicant applies for an original or a replacement SSN card through EBE, DHS collects information during the U.S. Citizenship and Immigration Services' application process, Form I-765 (*Application for Employment Authorization*) and electronically transmits certain data to SSA so an SSN can be assigned or a replacement card issued. Accordingly, applying for an SSN through EBE eliminates "... the need for non-immigrants to file an SS-5 (*Application for [a] Social Security Card*) application at an SSA field office."

From October 1, 2017 through March 31, 2018, SSA assigned 82,202 original SSNs through EBE and resolved 1,437 Enumeration Feedback Messages to alert employees an SSN may already exist.

Findings

We identified 138 non-citizens to whom SSA had issued multiple SSNs. These 138 individuals applied for SSNs via EBE and at an SSA field office.

SSA should not have processed the 138 non-citizens' second application because, in each case, the non-citizen's 2 SSN applications—1 submitted through EBE and 1 at a field office—had similar information. Of the 138 applications, 130 (94 percent) had enough identifying information that SSA employees should not have issued the second SSNs. The identifying information for the remaining eight applicants should have prompted SSA employees to contact the individuals to resolve the discrepant information.

Before our review, SSA had identified the improperly assigned SSNs for 44 of these 138 non-citizens and cross-referenced their SSNs in its records. We provided SSA the remaining 94 non-citizens whom SSA improperly assigned 2 SSNs.

Recommendations

We made three recommendations for SSA to take appropriate actions to improve its controls over SSN assignment through the EBE process. SSA agreed with our recommendations.

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ABBREVIATIONS

C.F.R.	Code of Federal Regulations
DHS	Department of Homeland Security
EBE	Enumeration Beyond Entry
EFM	Enumeration Feedback Message
Form I-765	<i>Application for Employment Authorization</i>
Form SS-5	<i>Application for a Social Security Card</i>
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSN	Social Security Number
SSNAP	Social Security Number Application Process

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OBJECTIVE

Our objective was to determine whether the Social Security Administration's (SSA) controls prevented the assignment of multiple Social Security numbers (SSN) to non-citizens who applied for SSNs through the Enumeration Beyond Entry (EBE) process.

BACKGROUND

In October 2017, the EBE program was created through an agreement between SSA and “. . . the Department of Homeland Security (DHS)¹ to assist SSA in enumerating² certain applicants who: live in the United States, apply for work authorization, and need to obtain a[n] SSN.”³ When an applicant applies for an original or a replacement SSN card through EBE, DHS collects information during the U.S. Citizenship and Immigration Services' application process, Form I-765 (*Application for Employment Authorization*) and electronically transmits certain data to SSA so an SSN can be assigned or a replacement card issued. Accordingly, applying for an SSN through EBE eliminates “. . . the need for non-immigrants to file an SS-5 (*Application for [a] Social Security Card*) application at an SSA field office.”⁴ According to SSA, EBE ensures the integrity of, and streamlines, SSA's enumeration process because the information needed to assign the SSN is collected and verified by the U.S. Citizenship and Immigration Services, the agency responsible for conferring lawful status and work authorization. The U.S. Citizenship and Immigration Services certifies identity, age, current immigration status, and authorization to work. SSA continues to issue non-citizens temporarily authorized to work an SSN card with a restrictive legend, “VALID FOR WORK ONLY WITH DHS AUTHORIZATION.”⁵ This legend indicates the card is only valid as proof of work authorization when presented with a current, valid DHS employment authorization document.

¹ 20 C.F.R. § 422.103(b)(3) (govinfo.gov 2018).

² SSA calls its process for assigning SSNs enumeration. SSA, *Social Security Administration (SSA) Annual Data for Enumeration Accuracy*, ssa.gov (last visited September 4, 2019).

³ The nine-digit SSN helps SSA identify and accurately record wages or self-employment earnings. SSA also uses the SSN to monitor the individual's record once benefits begin. SSA, *Social Security Number and Card*, ssa.gov (last visited September 4, 2019). The card issued when SSA assigns the SSN is called the original card. Subsequent cards issued from the same SSN account are called replacement cards. *Statement of Frederick G. Streckewald, Assistant Deputy Commissioner for Program Policy, Office of Disability and Income Security Programs in Testimony Before the House Committee on Ways and Means, Subcommittee on Social Security, on the Management of SSA's Enumeration Process*, 109th Congress p. 4 (2005).

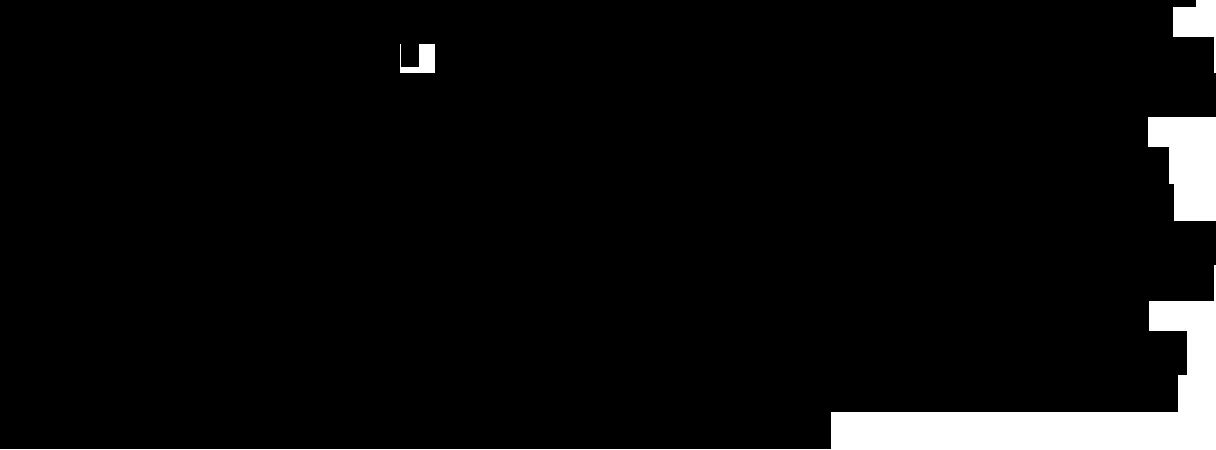
⁴ SSA, POMS, RM 10205.700, A (October 2, 2017).

⁵ SSA, POMS, RM 10205.700, B.3. (October 2, 2017).

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If a non-citizen applies for an SSN at a field office, he/she must complete an SSN card application.⁶ The non-citizen must submit “At least two documents to establish age, identity, and citizenship/lawful alien status . . .”⁷ A field office employee reviews the documents submitted and enters the applicant’s information into SSA’s Social Security Number Application Process (SSNAP).⁸ Field office employees must verify current lawful alien or citizenship status with DHS before assigning an original SSN. SSNAP uses the application data submitted from EBE or the field office employee to process and assign “. . . original SSNs to applicants or issues SSN replacement cards, as appropriate” and mails the card to the address the applicant provided.⁹

SSA instituted internal controls to prevent non-citizens who apply and receive an SSN through EBE from then receiving another SSN through the field office. Once SSNAP receives SSN application data, applicants’ information undergoes numerous automated edits.



⁶ SSA, *POMS*, RM 10205.005, A (November 30, 2015).

⁷ SSA, *POMS*, RM 10210.010, A (October 25, 2010).

⁸ SSA refers to its enumeration system as SSNAP.

⁹ SSA, *POMS*, RM 10205.700, B (October 2, 2017).



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From October 1, 2017 through March 31, 2018, SSA assigned 82,202 original SSNs through EBE.¹² To determine whether SSA controls prevented the assignment of multiple SSNs to non-citizens who applied for SSNs through the EBE process, we performed the following.

- From the population of 82,202 SSNs assigned through EBE.
 - We matched [REDACTED] [REDACTED]
[REDACTED] We manually reviewed applications
[REDACTED] For those that also had [REDACTED]
[REDACTED] We identified 135 non-citizens with multiple SSNs.
We also reviewed the EFM's SSNAP generated for the 135 non-citizens' applications.
 - Of the remaining 82,067 EBE SSNs, we randomly selected 50 for review. We queried SSA's Numident using each applicant's name and date of birth to determine whether SSA had previously assigned him/her an SSN.
- We obtained 1,437 EFM's SSNAP generated and SSA employees resolved for the audit period October 1, 2017 through March 31, 2018. From the 1,437 EFM's, we removed 8 that we examined during our manual review of SSN applications. From the remaining 1,429 EFM's, we randomly selected 100 for review. For these 100 EFM's, we queried the Numident using each applicant's name and date of birth to determine whether SSA had assigned him/her an SSN. For the resulting potential matches, we reviewed the EBE and field office applications for additional matching identifying data.

See Appendix A for a detailed description of our scope and methodology.

¹² During this same period, SSA issued 7,994 replacement SSN cards through EBE. We did not review replacement card applications as this was not part of our objective.

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RESULTS OF REVIEW

We identified 138 non-citizens to whom SSA had issued multiple SSNs.¹³ These 138 individuals applied for SSNs via EBE and at an SSA field office. Although SSNAP generated EFMs to alert employees an SSN may have already been assigned for these 138 non-citizens, employees incorrectly cleared the alert and processed the second SSN application.

SSA should not have processed the 138 non-citizens' second application because, in each case, the non-citizen's 2 SSN applications—1 submitted through EBE and 1 at a field office—had the same [REDACTED]

[REDACTED] 30 (94 percent) of the 138 applications had enough identifying information that SSA employees should not have issued the second SSNs. The identifying information for the remaining eight applicants should have prompted SSA employees to contact the individuals to resolve the discrepant information.

Before our review, SSA had identified the improperly assigned SSNs for 44 of these 138 non-citizens and cross-referenced¹⁴ their SSNs in its records.¹⁵ We provided SSA the remaining 94 non-citizens whom SSA improperly assigned 2 SSNs.

Non-citizens Assigned Multiple SSNs

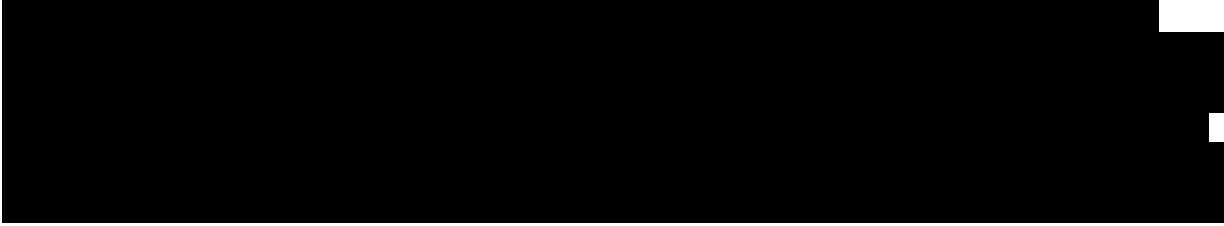
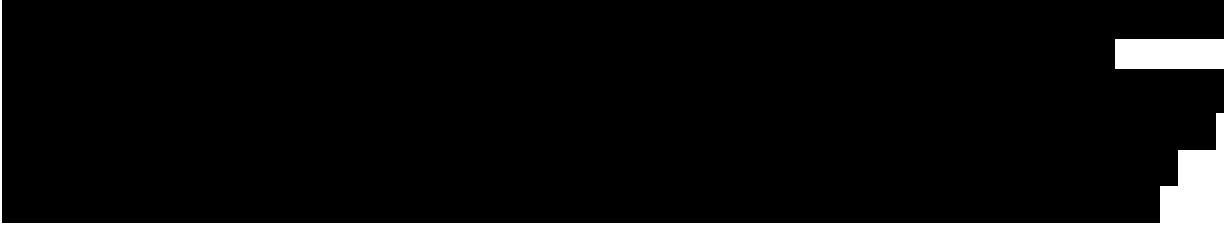
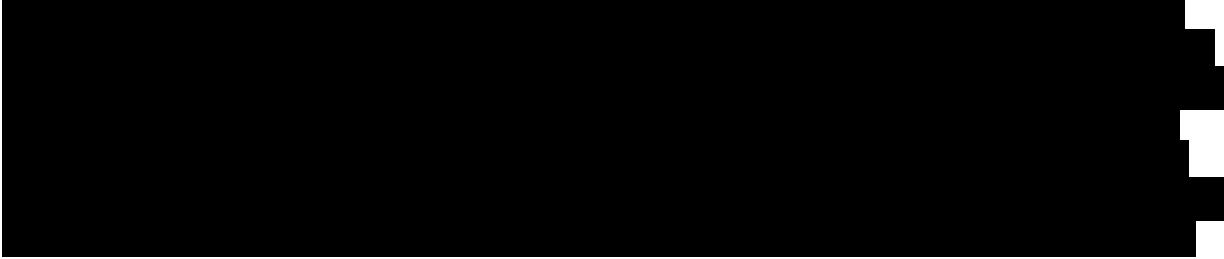
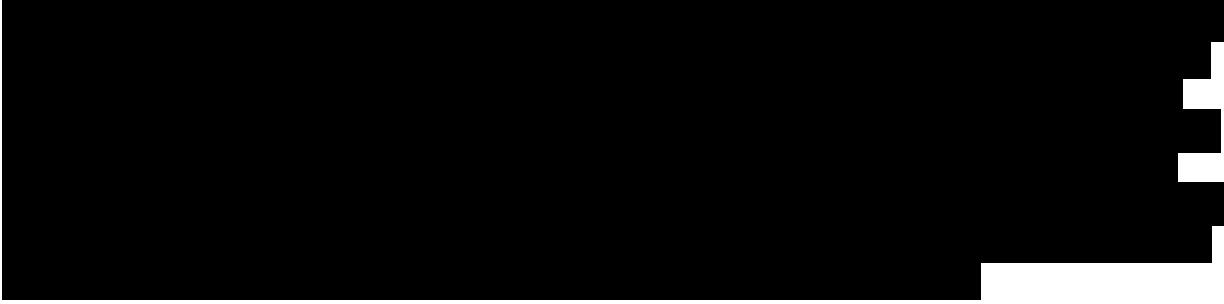
SSA improperly assigned 2 original SSNs to each of the 138 non-citizens. For these 138 non-citizens, SSA's enumeration system created EFMs; however, SSA assigned 1 SSN through its EBE process and a second SSN from an application processed at an SSA field office. SSA employees had enough matching information that they should not have issued the second SSN. The matching identifying information should have prompted them to contact the individual to resolve the discrepant information or not process the application in question for each of the 138 non-citizens who received 2 SSNs.

¹³ Our audit work consisted of three separate reviews. The first was a manual review that identified 135 non-citizens who received 2 SSNs through both EBE and a field office application. The second was a randomly selected sample of 50 EBE SSN applications where we found no exceptions. The third review was a randomly selected sample of 100 EBE-related EFMs resolved during our audit period. From this sample of EFMs, we identified 3 additional non-citizens who received 2 SSNs, resulting in 138 non-citizens we identified who had received 2 SSNs.

¹⁴ When SSA cross-references SSNs, one is chosen as the active SSN to be used by the numberholder. The other SSN is retired to reduce the possibility of confusion, error, misuse, and fraud. The numberholder cannot update the record, receive a replacement card, or use the retired SSN to file a claim for benefits.

¹⁵ SSA explained that 41 of the 44 non-citizens' records were cross-referenced after they re-contacted SSA's field offices. SSA's records state that some of the non-citizens reported receiving the second SSN during that visit.

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A prior OIG audit identified SSA's continued risk of improper payments to beneficiaries who had multiple SSNs. For example, we found improper payments totaling approximately \$46.9 million to 724 beneficiaries who received benefits under multiple SSNs for various reasons including individuals using multiple SSNs, identity theft, and administrative errors.¹⁶ The

¹⁶ SSA, OIG, *Follow-up: Individuals Who Inappropriately Received Benefits Under Multiple Social Security Numbers*, A-01-16-50075, (April 2019).

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continued assignment of multiple SSNs to non-citizens increases the risk of overpayments to individuals with multiple SSNs.

CONCLUSIONS

SSA has controls in place that alert employees when its system identifies an existing SSN with information similar to the information provided by the applicant. However, its control did not always prevent non-citizens from obtaining multiple SSNs. SSA assigned 2 SSNs each to 138 non-citizens because SSA employees incorrectly cleared EFMIs and processed the second SSN application even though all 138 non-citizens had 2 SSN applications [REDACTED]

RECOMMENDATIONS

We recommend SSA:

1. Cross-reference the multiple SSNs the Agency assigned to the 94 non-citizens we identified during our review.
2. Revise its EFM guidance [REDACTED]
3. Contact DHS, the custodian of the record, [REDACTED] and request DHS collect and provide [REDACTED]

AGENCY COMMENTS

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



Rona Lawson
Assistant Inspector General for Audit

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APPENDICES

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Appendix A – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed applicable sections of Federal laws and regulations, the Social Security Administration's (SSA) policies and procedures, and prior Office of the Inspector General reports.
- Obtained a data extract from SSA's Social Security Number Application Process (SSNAP) for the period October 1, 2017 through March 31, 2018. We identified 82,202 original Social Security number (SSN) applications processed through the Enumeration Beyond Entry (EBE) program and 237,053 original SSN applications processed through field offices.
- Using data analysis software, [REDACTED]

[REDACTED] Based on our manual reviews, we determined SSA assigned multiple SSNs to 135 non-citizens. For these 135 non-citizens with multiple SSNs, we obtained and reviewed the Enumeration Feedback Messages (EFM) that SSNAP generated.²

- Removed the 135 SSN application records from the 82,202 EBE population and sampled 50 SSNs from the remaining 82,067 EBE population. For the 50 sampled SSNs, we queried SSA's Numident using each applicant's name and date of birth to determine whether SSA had previously assigned him/her an SSN. [REDACTED]

² SSA's SSNAP creates EFMs to alert employees there may be an SSN already assigned when it detects an existing Numident record with similar information to the SSN application.

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- Obtained from SSA 1,437 EFM s, that SSNAP generated, and SSA employees resolved, for the audit period October 1, 2018 through March 31, 2019.³ From the 1,437 EFM s, we removed 8 that we examined during our manual review of SSN applications. From the remaining 1,429 EFM s, we randomly selected 100 for review. For the 100 EFM s, we queried the Numident using each applicant's name and date of birth to determine whether SSA had assigned him/her an SSN. For the resulting potential matches, we then reviewed the EBE and field office application for additional matching identifying data, [REDACTED] [REDACTED] Based on our review, we determined SSA assigned multiple SSNs to 3 non-citizens.
- We reviewed SSA's benefit records for the 138 individuals whom SSA assigned multiple SSNs and found none had received benefit payments.

We conducted our review in Birmingham, Alabama, between April and June 2019. We determined the data used for this audit were sufficiently reliable to meet our audit objective. The primary entity audited was the Office of the Deputy Commissioner for Operations. 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 findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

³ This population excluded the EFM s related to the 135 non-citizens we had previously reviewed.

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Appendix B – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: December 5, 2019 Refer To: S1J-3

To: Gail S. Ennis
Inspector General

Stephanie Hall

From: Stephanie Hall
Chief of Staff

Subject: Office of the Inspector General Draft Report "Multiple Social Security Numbers Assigned to Noncitizens Using the Enumeration Beyond Entry Program" (A-08-18-50472) -- INFORMATION

Thank you for the opportunity to review the draft report. We agree with the recommendations. We are taking steps to revise and publish additional instructions for resolving alerts that indicate a Social Security Number may already exist for an applicant. We will also work with the Department of Homeland Security (DHS) to discuss whether additional information from the applicant's submission to DHS may assist us in enumerating non-citizens.

Please let me know if we can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.

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