



Report Summary

Social Security Administration
Office of the Inspector General

Social Security Numbers Assigned to Citizens of Compact of Free Association Countries (Limited Distribution) (A-08-07-17077)

Our objective was to identify and assess vulnerabilities in the Social Security Administration's (SSA) process for assigning Social Security numbers (SSN) to individuals admitted to the United States under provisions of the Compacts of Free Association (CFA).

CFA defines the relationships the Republic of the Marshall Islands, the Federated States of Micronesia and the Republic of Palau have entered into as "associated states" with the United States. Now sovereign nations, the three freely associated states were formerly part of the "Trust Territory of the Pacific Islands," a United Nations trusteeship created in 1947 and administered by the United States. Under the CFA relationship, the United States provides guaranteed financial assistance in exchange for certain defense rights. The United States gives these nations unique access to many U.S. domestic programs—including the right to enter, reside, and work in the United States without regard to certain immigration laws.

Because the Compacts authorize CFA citizens to work in the United States, they may obtain an SSN if they enter the country under the terms of the Compacts. To gain such status, CFA citizens must provide immigration officials with documents specified by the Compacts to enter the United States to live and work. If this is not their intent, they may be granted another nonimmigrant class of admission—such as that of a visitor or foreign student. Because of the unique and complex immigration status accorded this group, SSA implemented specific policy detailing documents CFA citizens must present to confirm their immigration status before the Agency assigns an SSN or issues a replacement SSN card.

CFA countries are island nations dispersed over more than 1 million square miles of the Pacific Ocean. These countries are comprised of distinct ethnic groups with diverse traditions, whose sociocultural practices often vary greatly from those of the Western World. Because of these cultural differences, SSA faces challenges when assigning SSNs to CFA citizens.

To accomplish our objectives, we obtained a data extract of original SSNs SSA assigned to noncitizens from April 1 through December 31, 2005. In Calendar Year 2005, SSA assigned approximately 1.2 million original SSNs to noncitizens, including about 5,009 to individuals born in CFA countries. For our 9-month audit period, we identified a population of 3,757 SSNs that SSA assigned to individuals who, according to Agency records, were born in 1 of the 3 CFA countries. From this population, we randomly selected 250 SSNs to analyze. We identified an additional 45 SSNs that belonged to numberholders who, according to SSA records, were not born in 1 of the CFA countries, but SSA recorded information on the SSN applications that indicated potential CFA citizenship. During our review of these 295 records, we identified and excluded 10 because the numberholders were not CFA citizens or,

according to SSA records, were not admitted to the United States under provisions of the Compacts. For the remaining 285 records, we determined whether SSA followed its CFA policy in assigning the SSN. We also submitted the 285 records to the Department of Homeland Security (DHS) to determine whether the evidentiary documents presented to SSA were consistent with DHS records.

To learn more about the challenges SSA faces in assigning SSNs to CFA citizens, we interviewed Agency regional and field office personnel in offices that were familiar with assigning SSNs to CFA citizens. We also obtained information from DHS and Department of State (State) representatives regarding immigration and legal issues associated with CFA citizens who enter the United States under provisions of the Compacts.

We believe the Agency's policies and practices place it at-risk for improper SSN assignment to CFA citizens. Additionally, cultural differences make it difficult for SSA to ensure the proper enumeration of CFA citizens. Further, we believe SSA's CFA policy is vague, incomplete and outdated.

We made two recommendations to SSA. The Agency agreed with our recommendations.

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