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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**CONTROLS FOR ISSUING  
SOCIAL SECURITY NUMBER PRINTOUTS**

December 2011

**A-04-11-11105**

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**AUDIT REPORT**

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## Mission

By conducting independent and objective audits, evaluations and investigations, we inspire public confidence in the integrity and security of SSA's programs and operations and protect them against fraud, waste and abuse. We provide timely, useful and reliable information and advice to Administration officials, Congress and the public.

## Authority

The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:

- Conduct and supervise independent and objective audits and investigations relating to agency programs and operations.
- Promote economy, effectiveness, and efficiency within the agency.
- Prevent and detect fraud, waste, and abuse in agency programs and operations.
- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.
- Keep the agency head and the Congress fully and currently informed of problems in agency programs and operations.

To ensure objectivity, the IG Act empowers the IG with:

- Independence to determine what reviews to perform.
- Access to all information necessary for the reviews.
- Authority to publish findings and recommendations based on the reviews.

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We strive for continual improvement in SSA's programs, operations and management by proactively seeking new ways to prevent and deter fraud, waste and abuse. We commit to integrity and excellence by supporting an environment that provides a valuable public service while encouraging employee development and retention and fostering diversity and innovation.



## SOCIAL SECURITY

### **MEMORANDUM**

Date: December 13, 2011 Refer To:

To: The Commissioner

From: Inspector General

Subject: Controls for Issuing Social Security Number Printouts (A-04-11-11105)

### **OBJECTIVE**

The objectives of our review were to determine whether (1) the Social Security Administration (SSA) had adequate internal controls over the issuance of Social Security number (SSN) Printouts; and (2) field offices located near the United States-Mexico border issued an unusually high number of SSN Printouts.

### **BACKGROUND**

In compliance with the *Privacy Act of 1974* (Privacy Act) and other applicable laws and regulations,<sup>1</sup> SSA's information disclosure policy dictates that it will protect the privacy of individuals to the fullest extent possible, while also permitting the exchange of information needed to fulfill its administrative and program responsibilities. Federal law, subject to certain exceptions, gives individuals the right to access their personal information in SSA's systems of records.<sup>2</sup>

Generally, individuals have access to SSA records the Agency can retrieve by name, SSN, or other personal identifier.<sup>3</sup> This includes SSN-related enumeration records, such as the original *Application for a Social Security Card* and the Numident.<sup>4</sup> The Numident contains a significant amount of the numberholder's personally identifiable information (for example, name, SSN, date of birth, place of birth, and parents' names).

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<sup>1</sup> *Privacy Act of 1974*, 5 U.S.C. § 552a. see also the *Social Security Act* § 1106, 42 U.S.C. § 1306 and 20 C.F.R. Part 401.

<sup>2</sup> 20 C.F.R. § 401.35.

<sup>3</sup> 20 C.F.R. § 401.20(a).

<sup>4</sup> The Numident is an electronic record of the information on an individual's original application for an SSN and subsequent applications for replacement cards. Numident printouts are not issued by SSA field offices. Rather, to obtain a Numident, an individual must send a written request to SSA's Central Office and pay a fee.

Because SSA was concerned about identity theft that could occur if someone with ill intent obtained a Numident, in January 2002, SSA began issuing SSN Printouts, which contain the numberholder's name and SSN. See Appendix B for an example of an SSN Printout. The SSN card is the only official paper verification of an individual's SSN. However, an SSN Printout contains the same information, but with none of the same security features.

The *Real ID Act of 2005* (Real ID Act) modified Federal law pertaining to the security, authentication, and issuance procedures for State driver's licenses and identification cards.<sup>5</sup> To comply with the Real ID Act, a State can only issue a driver's license or identification card when the applicant provides documentation of the SSN or verification the applicant is not eligible for an SSN.<sup>6</sup> According to the Department of Homeland Security regulations regarding implementation of the Real ID Act, States can accept several types of documentation as proof of the SSN, including the SSN card, a Form W-2, a Form SSA-1099, a non-SSA-1099 Form, or a pay stub bearing the applicant's name and SSN.<sup>7</sup> Although regulations do not specifically mention the SSN Printout, some States accept it as proof of the SSN. For example, the Ohio Bureau of Motor Vehicles and the Mississippi Department of Public Safety accept the SSN Printout in their driver's license application processes.

In Fiscal Year (FY) 2009, SSA issued about 7 million SSN Printouts. See Appendix C for the distribution of SSN Printouts by SSA regions. The number of SSN Printouts issued has continued to increase each year since FY 2003, the first full year SSA issued them. Table 1 details the number of SSN Printouts issued by FY.

**Table 1: SSN Printouts by FY**

FY	SSN Printouts	Increase from Previous Year	Percentage Increase from Previous Year
2003	4,618,180	--	--
2004	5,304,052	685,872	14.9
2005	5,621,500	317,448	6.0
2006	6,336,750	715,250	12.7
2007	6,826,106	489,356	7.7
2008	6,933,663	107,557	1.6
2009	7,014,882	81,219	1.2

We previously reviewed SSA's controls over SSN Printouts, and reported our results in December 2007.<sup>8</sup> In that report, we made eight recommendations to improve SSA's

<sup>5</sup> *Real ID Act of 2005*, Pub. L. No. 109-13, 119 Stat. 231, Division B.

<sup>6</sup> *Id.* at Title I, § 202(c)(1)(C).

<sup>7</sup> 6 C.F.R § 37.11(e).

<sup>8</sup> SSA OIG, *Controls for Issuing Social Security Number Verification Printouts* (A-04-07-27112), December 2007.

controls over the issuance of SSN Printouts. SSA agreed with three recommendations, partially agreed with four, and disagreed with one. SSA took some corrective actions in response to our recommendations. For example, SSA changed the name of the document from *SSN Verification Printout* to *SSN Printout*, and removed reference to a credit card as an acceptable form of identification to obtain the document. Additionally, SSA reported that it adopted a function to monitor SSN Printout transactions in the Web-based Comprehensive Integrity Review Process (Web CIRP).<sup>9</sup> See Appendix D for detailed information on our recommendations and SSA's response from our 2007 report.

We initiated this second review of SSN Printouts in response to an inquiry posed during an April 15, 2010 hearing on SSA field office service delivery before the U.S. House of Representatives, Committee on Ways and Means, Subcommittee on Social Security. That inquiry questioned how many SSN Printouts SSA issued at field offices near the United States-Mexico border. The Inspector General stated that his office would review this issue. See Appendix E for information on our scope and methodology.

## RESULTS OF REVIEW

Despite some corrective actions SSA took in response to our previous report, we continue to believe the Agency should strengthen its controls for issuing SSN Printouts. In fact, since our December 2007 report, we found an increase in the (1) number of SSN Printouts SSA issued, (2) volume of numberholders obtaining more than 10 SSN Printouts in a day and a year, and (3) occurrences of fraud involving SSN Printouts.

In response to our previous report, SSA emphasized the importance of protecting the integrity of the SSN and the enumeration process. However, SSA also stressed that its procedures for issuing SSN Printouts must comply with the intent of the Privacy Act and Office of Management and Budget (OMB) guidelines—to provide individuals appropriate and timely access to their SSN information. As such, SSA's identity requirements for issuing SSN Printouts are less stringent than those for issuing replacement SSN cards. We acknowledge the importance of SSA's compliance with Privacy Act and OMB guidelines. Nevertheless, we are concerned SSA continues to issue a high number of SSN Printouts with less stringent identity requirements and fewer controls than those for SSN cards. Additionally, unlike SSN cards, SSN Printouts have no physical security features—which makes them easier to counterfeit and more prone to SSN misuse and identity theft.

Similar to our previous review, we noted in this audit that SSA managers still had little information to monitor the number of SSN Printouts issued and related anomalies. Better information would enable SSA managers to identify and address potential

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<sup>9</sup> Implemented in FY 2008, Web CIRP is an electronic application that provides management information on sensitive data that staff access in SSA's system of records. Specifically, Web CIRP provides information resulting from automated integrity reviews of transactions involving enumeration, Supplemental Security Income; and Retirement, Survivors and Disability Insurance. Access to Web CIRP is restricted to authorized managers.

problems, such as SSA staff offering SSN Printouts to all or most replacement SSN card applicants and numberholders who obtained an excessive number of printouts in 1 day or year.

Overall, SSA continues to issue a high number of SSN Printouts. As such, we believe SSA should improve its procedures to control and account for the issuance of SSN Printouts while also making efforts to reduce the unnecessary demand for the document as a form of SSN verification.

Lastly, we found, that the 18 field offices located within 30 miles of the United States-Mexico border did not generally issue a higher number of SSN Printouts than field offices located more than 30 miles from the border.

## **CONTROLS FOR SSN PRINTOUTS SHOULD BE IMPROVED**

SSN cards and Printouts contain the same information—the numberholder's name and SSN. However, SSA processes a replacement SSN card and an SSN Printout differently, and the two documents differ themselves. These differences are as follows.

- The identity requirements for obtaining an SSN Printout are less stringent than those for obtaining a replacement SSN card.
- SSA limits the number of replacement SSN cards an individual can obtain, but has not established limits on SSN Printouts.
- SSA processes and controls replacement SSN cards through the Social Security Number Application Process (SSNAP) system, while it issues SSN Printouts via a simple system query print function.
- An SSN card has physical security features—the SSN Printout has none.

While the process for issuing replacement SSN cards and the SSN Printout differ considerably, and the documents themselves are not similar in appearance, SSA issues almost two SSN Printouts for every three replacement SSN cards it issues. Table 2 compares the number of replacement SSN cards and SSN Printouts issued since FY 2004.

**Table 2: Replacement SSN Cards and SSN Printouts Issued by FY**

FY	Number of Replacement SSN Cards	Number of SSN Printouts	Percentage of SSN Printouts to Replacement Cards
2004	12,364,771	5,304,052	42.9
2005	12,078,921	5,621,500	46.5
2006	11,575,697	6,336,750	54.7
2007	11,555,718	6,826,106	59.1
2008	11,732,831	6,933,663	59.1
2009	11,393,350	7,014,882	61.6

## Differences in Identity Requirements

The identity requirements for obtaining an SSN Printout are less restrictive than those for obtaining a replacement SSN card. Although SSA prefers a State driver's license or State photograph identification to process and issue an SSN Printout, SSA allows an individual to obtain an SSN Printout with other, less probative, identity documents or without any identity documents.<sup>10</sup> For example, an individual could obtain an SSN Printout with a health insurance card that does not contain a picture of the applicant or the individual's date of birth. However, generally, this document would not be an acceptable form of identification to obtain a replacement SSN card. Also, an individual who cannot provide any identity documents can obtain the SSN Printout by answering certain identifying questions and signing a form stating they are who they claim to be.<sup>11</sup> Further, in contrast with SSA's enumeration policies, Agency procedures allow an individual to obtain an SSN Printout by calling SSA.<sup>12</sup> In this situation, photograph identification is not required, and individuals prove their identity by providing identifying information—not identity documents.

We visited 11 field offices<sup>13</sup> and observed SSA personnel issuing 69 SSN Printouts. Of these 69 SSN Printouts, SSA personnel issued

- 7 (10.1 percent) when the requestor had no identifying documentation; and
- 6 (8.7 percent) based on identity documents that would not be acceptable to obtain a replacement SSN card.

Given the personally identifiable information in these documents, which we believe is equal to that of the SSN card, we are concerned that SSA issued almost 20 percent without substantive proof of the requestor's identity.

We acknowledge that the less restrictive identity requirements for obtaining an SSN Printout are consistent with SSA's disclosure regulations that implement the Privacy Act.<sup>14</sup> However, we believe these reduced requirements increase the chance SSA will improperly provide an individual with personally identifiable information they should not have. We recognize the hardship individuals experience when attempting to replace lost or stolen identity documents. Often, the first step in replacing these documents is a

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<sup>10</sup> SSA, Program Operations Manual System (POMS), GN 03340.015 B (October 08, 2010).

<sup>11</sup> SSA, POMS, GN 03380.005 B.1 (December 20, 2010) and GN 03340.015 B (October 8, 2010).

<sup>12</sup> SSA, POMS, GN 03340.015 B (October 8, 2010).

<sup>13</sup> We visited the following 11 SSA field offices: Albuquerque, New Mexico; Atlanta West, Georgia; Austin, Texas; Birmingham (Downtown), Alabama; Columbia, South Carolina; El Paso, Texas; El Paso (Downtown), Texas; Las Vegas Card Center, Nevada; Mobile, Alabama; Pensacola, Florida; and San Antonio (Downtown), Texas.

<sup>14</sup> 20 C.F.R. § 401.40(a).

visit to an SSA field office to obtain proof of the individual's SSN. Accordingly, although we believe SSA should require that applicants for SSN Printouts provide the same identity documents the Agency requires for a replacement SSN card, we acknowledge that SSA may need to implement exception procedures. For example, if an individual's required identity documents are lost or stolen—and the individual will not be able to replace these documents without proof of an SSN—SSA could require management approval before issuing the SSN Printout.

### No Limits on the Number of SSN Printouts

In compliance with the *Intelligence Reform and Terrorism Prevention Act of 2004* (IRTPA), SSA limits the number of replacement SSN cards a numberholder can obtain to 3 in a year and 10 in a lifetime.<sup>15</sup> However, SSA has not imposed any limits on the number of SSN Printouts a numberholder can obtain in a day, year, or lifetime. We believe the ability to obtain unlimited quantities of SSN Printouts may negate the intended benefits from the limits on replacement cards. We recognize the Privacy Act requires that SSA give the numberholder access to information it holds in its systems of records. However, we believe SSA should establish a limit on the number of SSN Printouts an individual may obtain in a day, year, and lifetime, and require specific management approval for requests that exceed that limit.

Our analysis of the SSN Printout data found the number of individuals to whom SSA issued 10 or more SSN Printouts in a day and in a year increased from the number we discussed in our December 2007 report. In that report, we stated that in FY 2006, SSA issued 10 or more SSN Printouts in 1 day to 36 different numberholders; and issued 10 or more SSN Printouts in the year to 77 numberholders. In FY 2009, these numbers increased to 89 and 158, respectively.

Our Office of Investigations (OI) searched its databases for a criminal allegation or investigation related to any of the numberholders who obtained more than 10 SSN Printouts in FY 2009 or the first 6 months of FY 2010. OI identified nine SSNs that met the search criteria. For four of these SSNs, the cases involved counterfeiting or altering SSN Printouts. For the other five SSNs, the cases involved SSN misuse and/or identity theft. We believe proactive integrity reviews of instances in which the number and frequency of SSN Printouts appear unusual would help limit misuse of the document.

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<sup>15</sup> Pub. L. No. 108-458, 118 Stat. 3638, § 7213, 42 U.S.C. § 405 note. SSA's Commissioner may, in compelling circumstances and on a case-by case basis, allow for reasonable exception to the limits set forth in the law.

## Difference in Processing Controls

When field office staff process a replacement SSN application, SSNAP establishes a record of the applicant's identity document(s). For example, field office staff record in SSNAP the type of document presented, the document's identification number, and other pertinent information. Also, when the application is cleared for processing, SSNAP updates the Numident to reflect the SSN card action. In contrast, when field office staff complete an SSN Printout action, they only execute a print function within the Numident query. As a result, no SSA system establishes a record of the identity documents presented with each SSN Printout request. Additionally, the Numident does not capture and include a record that SSA issued a numberholder an SSN Printout.

SSA often issues SSN Printouts in conjunction with replacement SSN card applications. However, SSNAP does not include a step to document the issuance of an SSN Printout in conjunction with a successful replacement card application. We recognize that SSA may need to expend resources to modify SSNAP to account for the issuance of all SSN Printouts. However, given the high volume of SSN Printouts SSA issues annually, we emphasize the importance of having a method to control and account for the issuance of SSN Printouts. As such, we believe SSA should consider cost-effective methods of controlling and accounting for the issuance of SSN Printouts.

## SSN Printouts Lack Physical Security Features

In addition to being easier to obtain than replacement SSN cards, an SSN Printout has no physical security features to prevent it from being counterfeited and used in fraud. In contrast, the SSN card has several security features. The SSN Printout is printed on plain white printer paper in standard black ink. To authenticate the document, SSA requires that personnel stamp the field office name and address on the SSN Printout and sign it. Although the stamp and signature provide some level of authenticity, we believe that with today's technology, an unscrupulous individual could alter and produce a counterfeit SSN Printout. In addition to the examples of SSN Printout fraud mentioned above, another OI case involved individuals who counterfeited SSN Printouts to obtain jobs.

While we believe adding physical security features to SSN Printouts would make them more difficult to alter or counterfeit, given SSA's limited resources, we recognize that implementing such a change may be cost-prohibitive. To include physical security features in each SSN Printout issued, SSA would likely experience increased processing costs in addition to the costs of the security feature themselves. As such, we believe efforts to better control and account for SSN Printouts, in conjunction with efforts to decrease the demand for the document, would help reduce the possibility of individuals using the SSN Printout for fraud.

## **MANAGEMENT INFORMATION IS NEEDED TO BETTER MONITOR THE SSN PRINTOUT WORKLOAD**

SSA has not developed easily accessible and useful management information for SSN Printouts. As a result, field office management did not have data to monitor this workload properly. The lack of information limits management's ability to identify trends or anomalies that require further investigation. Information on this workload would enable management to identify such concerns as a high volume of SSN Printouts issued from a specific office or employee and the issuance of multiple SSN Printouts to a numberholder.

SSA captures information for processed SSN Printouts in its Audit Trail System. The data include the SSN queried, date the SSN Printout was issued, office code of the issuing field office, and employee's code for the staff who processed the action. In FY 2008, SSA's Web CIRP system began monitoring data from the Audit Trail System and other SSA systems of records to develop management information on actions that involved sensitive information. Web CIRP included an application to provide information on SSN Printout transactions. At the field office level, Web CIRP provides management with a list of SSNs for issued SSN Printouts. Web CIRP lists the SSNs by employee and date. However, Web CIRP does not summarize the data into easy to use management information. For example, Web CIRP neither provides a monthly report identifying the total number of SSN Printouts a field office or a field office employee issued; nor identifies numberholders who received multiple SSN printouts. Also, we are concerned that, although Web CIRP made SSN Printout data available to field office managers, none of the 26 field offices we reviewed used Web CIRP to monitor SSN Printout transactions.

In September 2010, we notified SSA that we were initiating this audit, and we provided the Agency with our list of the 25 field offices that issued the most SSN Printouts in FY 2009. At the end of our review, we compared the average monthly SSN Printouts these offices issued in FY 2010 to the same average for the first 6 months of FY 2011. We found that 22 (88 percent) of the 25 field offices had an average monthly decline in the number of SSN Printouts issued from FY 2010 to FY 2011. Further, 3 of the 25 field offices had a monthly average decline of more than 35 percent during this period, as detailed in Table 3.

**Table 3: Top 25 Field Offices with a 35 Percent or Higher Decline in the Number of SSN Printouts Issued from FY 2010 to FY 2011**

Field Office	FY 2010 Monthly Average of SSN Printouts Issued	FY 2011 (First 6 Months) Monthly Average of SSN Printouts Issued	Decline in Number of SSN Printouts Issued	Percentage Decline in SSN Printouts Issued
Austin, Texas	2,052	407	(1,645)	-80.2%
Las Vegas, Nevada	3,976	1,961	(2,016)	-50.7%
San Antonio, Texas	1,993	1,291	(702)	-35.2%

The Austin, Texas, field office manager explained that, as a result of our audit, the field office had taken actions to reduce the number of SSN Printouts it issued to individuals who

- applied for an original SSN,
- requested the document so an employer could verify their SSN, and
- assumed they needed the SSN Printout for the State Department of Motor Vehicles (DMV), when in fact, the DMV no longer accepted the SSN Printout as a form of identification.

The manager also stated that the office initiated third-party outreach efforts that emphasized the importance of using one of SSA's online SSN verification services.

At the Las Vegas, Nevada, office, the manager stated that, after notification of our audit, he received instructions from the regional office to remind staff to follow SSA policies and procedures when issuing an SSN Printout. The manager attributed the decline in the number of SSN Printouts to the office's increased emphasis on only issuing the SSN Printout when it was requested, and the office's outreach to third parties to educate them about SSA's other SSN verification options.

The San Antonio field office manager explained that the decline was primarily attributed to staff's increased awareness to issue the SSN Printout only when requested, and to the State DMV's change in policy to no longer accept the SSN Printout as a form of identification.

The experiences of these offices illustrate the value of SSN Printout management information to field office and regional office managers. As such, we encourage the Agency to improve the ease and usefulness of the information it provides.

## LIMITING THE DEMAND FOR THE SSN PRINTOUT

Based on our interviews with SSA employees and several relevant organizations (for example, State Departments of Public Safety and the American Association of Motor Vehicle Administrators), we believe third parties who want the SSN Printout to verify an individual's SSN are one of the main drivers of SSN Printout volume and growth. Our

observations of the issuance of 69 SSN Printouts showed that numberholders requested these documents for various reasons, as detailed in Table 4.

**Table 4: Reasons Why Customers Requested SSN Printouts**

Reason for SSN Printout Requests	SSN Printouts	Percent
State DMV	20	29.0
Employer	18	26.1
State Social Service Agencies	15	21.7
Other Third Parties (that is, tax preparers, banks, schools)	7	10.1
Offered by SSA – Not Requested by Numberholder	5	7.3
Personal Use	4	5.8
<b>Total</b>	<b>69</b>	<b>100</b>

As confirmed by our observations, field office managers with whom we spoke stated that State DMVs and employers are the third parties that most frequently ask numberholders to obtain SSN Printouts. As discussed earlier, the Real ID Act of 2005 requires that applicants for a State driver's license or identification card provide documentation of their SSN, and some States are accepting the SSN Printout for this purpose.<sup>16</sup> State DMVs then use SSA's Social Security On-Line Verification (SSOLV) service, which compares an individual's name and SSN with SSA data to verify the SSN that was provided. Table 5 details some of the SSN verification services SSA provides to third parties.

**Table 5: Some of SSA's SSN Verification Services**

Service	Users	Method of Verification
Employee Verification Service	Employers and Certain Third Parties	Telephone, fax, or written request via mail. Employer must register with SSA when requests exceed 50 SSNs.
Social Security Number Verification Service	Employers and Certain Third Parties	On-line verification only. Employer must register with SSA to obtain an activation code, personal identification number and password.
E-Verify	Employers	On-line verification. Employer must register for program with the Department of Homeland Security. E-Verify also provides information to the employer regarding the employee's work authorization status in the United States.
SSOLV	State DMVs	On-line only. Users enter SSNs to be verified on SSA Website.

Even though SSA's overall position is that the SSN card is the only official paper verification of the SSN, in practice, third parties use the SSN Printout for just this purpose in some instances. To address the continuing increased demand for SSN Printouts by third parties, SSA could extend outreach to various third parties to raise the awareness that SSA offers several verification services that third parties can use in lieu

<sup>16</sup> Real ID Act of 2005, Pub. L. No. 109-13, 119 Stat. 231, Division B.

of the SSN Printout. However, we believe SSA also could explore other methods to lessen the demand for the SSN printout—such as charging a fee for the document.

In September 2011, we completed a review, *Congressional Response Report: Social Security Administration Field Office User Fees*.<sup>17</sup> The objectives of this review were to identify services and records for which SSA could charge a fee, and to evaluate the effect of charging fees on SSA's customer service and workloads.

In this report, we concluded SSA could implement user fees for certain high-volume services and records, including SSN Printouts, processed at its field offices. In FY 2010, we estimated that the cost to SSA for processing the SSN Printout workload was about \$145 million. If SSA charged a fee to recover these costs, or avoided the costs through decreased demand, SSA could focus its limited resources on other critical workloads. In response to a draft of this report, the Agency stated that it established a workgroup to study the best method to standardize fees, define the business process to charge and collect fees, and determine the costs to implement a remittance process to collect fees for certain services. The Agency further stated that the workgroup will evaluate the legislative changes needed to authorize SSA to charge fees for statutorily mandated services and the use of the resulting revenues.

## **STAFF DID NOT ALWAYS ISSUE SSN PRINTOUTS IN COMPLIANCE WITH SSA'S POLICIES AND PROCEDURES**

The field offices we reviewed did not always follow SSA regulations when issuing SSN Printouts. Specifically, staff at some field offices offered SSN Printouts to individuals who did not request them. In addition, in situations where the numberholder did not have adequate identification, some field offices did not require that the numberholder sign a form stating he/she was who they claimed to be.

### **SSN Printouts Offered to Individuals**

SSA's policies and procedures state that field offices should only provide SSN Printouts upon request and must not routinely provide them to numberholders.<sup>18</sup> However, some SSA field offices routinely offered SSN Printouts to individuals who applied for a replacement SSN card, rather than only to those customers who requested one. Specifically, 6 (23 percent) of the 26 field offices reviewed offered SSN Printouts to customers who did not request them. Not only is this practice contrary to SSA policy, it can greatly increase the number of SSN Printouts an office issues because many people who do not need an SSN Printout may accept one when offered. For example, at one field office that offered customers SSN Printouts, we observed SSA staff issuing seven SSN Printouts. For two of those Printouts, the customers stated they had no known use for the SSN Printouts but accepted them anyway. In another office, an SSA

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<sup>17</sup> SSA OIG, *Congressional Response Report: Social Security Administration Field Office User Fees* (A-04-11-01118), September 2011.

<sup>18</sup> SSA, POMS, RM 10225.005.B.2 (October 20, 2010).

employee provided a replacement SSN card applicant with an SSN Printout and referred to it as the individual's "temporary Social Security card."

We acknowledge that, in some instances, field office staff may offer SSN Printouts to replacement SSN card applicants who do not have sufficient identity documents. Specifically, if an individual does not have identity documents that meet the requirements to obtain a replacement SSN card, the field office staff will provide him/her an SSN Printout. The individual then uses this document to obtain a State driver's license or identity card. After obtaining a State driver's license or identity card, the individual must re-visit the field office to apply for a replacement SSN card. While circuitous—and, certainly an increase in workload for SSA and inconvenience for the applicant—requirements of the Real ID Act have made this process common for anyone whose identity documents are lost or stolen. In such circumstances, we understand that SSA staff may want to offer an individual an SSN Printout if he or she does not know to ask for it. However, we do not believe it is appropriate to offer an SSN Printout to every applicant for a replacement SSN card. Accordingly, we believe SSA should issue a reminder to field office staff that SSN Printouts should be provided to requestors in accordance with Agency policy.

### **Numberholders Not Required to Sign a Certifying Statement**

According to SSA regulations, if an individual does not have adequate identification, SSA staff should ask for enough identifying information (such as name, SSN, date of birth, place of birth, address, etc.).<sup>19</sup> If all information the numberholder provides matches the information in SSA's records, SSA staff should obtain a signed statement that the individual is who they claim to be. Many field offices use Form SSA-795, *Statement of Claimant or Other Person*, for this purpose. However, 5 (22 percent) of the 26 field offices in our review had not obtained these certifying statements, and 1 field office was not consistently obtaining the certifying statements. SSA should issue a reminder to field office staff to obtain a signed form from all individuals who do not have adequate identification stating they are who they claim to be.

### **FIELD OFFICES LOCATED NEAR THE UNITED STATES-MEXICO BORDER DID NOT ISSUE AN UNUSUALLY HIGH NUMBER OF SSN PRINTOUTS**

We analyzed FY 2009 SSN Printout data for the 18 SSA field offices located within 30 miles of the United States-Mexico border. In general, these field offices did not issue a higher number of SSN Printouts than field offices located more than 30 miles from the border. We ranked the field offices based on the number of SSN Printouts issued (most to fewest) in FY 2009, and found that the El Paso, Texas, district field office ranked 16<sup>th</sup> in the country—the only border office in the top 25 field offices issuing the highest number of SSN Printouts. Table 6 provides the rank and number of SSN Printouts issued in FY 2009 by field offices located within 30 miles of the United States-Mexico border.

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<sup>19</sup> SSA, POMS, GN 03340.015.B (October 8, 2010).

**Table 6: Number of SSN Printouts Issued in FY 2009 by Field Offices Located Within 30 Miles of the United States-Mexico Border**

	Field Office	SSN Printouts Issued	Rank (Based on 1,296 Field Offices)
1	El Paso (District Office), Texas	25,188	16
2	El Paso (Downtown), Texas	12,483	146
3	San Diego, California	9,691	219
4	El Cajon, California	9,620	223
5	La Mesa, California	9,501	225
6	Chula Vista, California	8,171	280
7	Kearny Mesa, California	7,712	303
8	El Centro, California	7,263	323
9	Laredo, Texas	6,553	372
10	Yuma, Arizona	5,862	426
11	National City, California	5,421	455
12	Nogales, Arizona	2,100	849
13	Eagle Pass, Texas	2,041	859
14	Brownsville, Texas	1,751	904
15	Douglas, Arizona	1,489	960
16	Del Rio, Texas	1,308	992
17	Harlingen, Texas	1,105	1,031
18	McAllen, Texas	275	1,210

During our audit, we visited both the El Paso district and El Paso downtown field offices. The field office manager at the El Paso district office explained that the office processed many original SSN applications, and the applicants often requested the SSN Printout for use as SSN verification until they received the actual card in the mail. The manager also explained that many schools in the area verified the students' SSNs and parents requested the SSN Printout for this purpose. Finally, the manager stated that to prevent repeat visits, SSA staff ask all customers if they need verification of their SSN. The manager at the El Paso downtown office explained that a nearby blood plasma donation center requires that donors provide evidence of an SSN. Therefore, donors often visit the field office to obtain an SSN Printout. The manager also stated that the Internal Revenue Service sends many of its customers to the field office to obtain an SSN Printout. Neither office manager specifically stated that its close proximity to the Mexico border was a primary factor for issuing SSN Printouts.

## CONCLUSION AND RECOMMENDATIONS

Because the SSN Printout contains sensitive personally identifiable information about numberholders and could be misused, we believe SSA should strengthen its policies and procedures for controlling and issuing these documents. Specifically, SSA should establish a limit on the number of SSN Printouts an individual may obtain in a day, year, and lifetime and require specific management approval for requests that exceed that limit.

Additionally, although Web CIRP provided some management information to help monitor the SSN Printout workload, none of the 26 field office managers we interviewed used the information. As such, we believe SSA should provide better and easier to use management information to those responsible for this workload.

Finally, third parties continue to use the SSN Printout to verify an individual's SSN. To lessen the demand for this document, we believe SSA could consider options for reducing the demand for this document, such as charging a fee for it. Our September 2011 report on user fees, we concluded SSA could implement fees for certain high-volume services and records, including SSN Printouts, processed at its field offices. In FY 2010, we estimated that the cost to SSA for processing the SSN Printout workload was about \$145 million. If SSA charged a fee to recover these costs, or avoided the costs through decreased demand, SSA could focus its limited resources on other critical workloads. In response to a draft of this report, the Agency stated that it established a workgroup to study the best method to standardize fees, define the business process to charge and collect fees, and determine the costs to implement a remittance process to collect fees for certain services. The Agency further stated that the workgroup will evaluate the legislative changes needed to authorize SSA to charge fees for statutorily mandated services and the use of the resulting revenues.

We recommend SSA:

1. Establish a limit on the number of SSN Printouts an individual may obtain in a day, year, and lifetime and require specific management approval for requests that exceed that limit.
2. Establish procedures that enable management to identify instances when the issuance of SSN Printouts may be reduced and enhance management oversight.
3. Require management approval prior to issuing an SSN Printout to an individual who provides insufficient or no identity documents. (As discussed below, we are withdrawing this recommendation.)
4. Develop and implement a cost-effective method for controlling and accounting for the issuance of SSN Printouts.
5. Develop and disseminate management information for the SSN Printout workload to responsible SSA personnel. At a minimum, the information should enable managers to identify anomalies in the number of SSN Printouts issued by field offices and to numberholders.
6. Issue a reminder to field office staff to issue SSN Printouts in accordance with SSA policy. We believe the reminder should advise that staff should not issue SSN Printouts to every replacement SSN card applicant. SSA should also remind field office staff to obtain a signed form from all individuals, who do not have adequate identification, stating they are who they claim to be.

## AGENCY COMMENTS

In response to our draft report, SSA agreed with 5 of our 6 recommendations. SSA disagreed with Recommendation 3. A summary of the Agency's response for Recommendation 3 follows. See Appendix G for the full text of SSA's comments.

Recommendation 3 suggested SSA require management approval prior to issuing an SSN Printout to an individual who provides insufficient or no identity documents. SSA disagreed with this recommendation and stated that it does not believe management review of every request involving insufficient or nonexistent documentation would be cost effective, in light of its other planned enhancements. SSA noted that it will evaluate the overall SSN Printout process and revise policies and internal controls to limit SSN Printouts and improve the identity requirements. SSA stated these revisions will include additional management information and automated tools that will provide increased management oversight.

## OIG RESPONSE

We acknowledge SSA's many planned improvements in its process for issuing SSN Printouts. Based on the actions SSA agreed to take, we have decided to withdraw Recommendation 3.

A handwritten signature in black ink, appearing to read "Patrick P. O'Carroll, Jr."

Patrick P. O'Carroll, Jr.

# Appendices

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APPENDIX A – Acronyms

APPENDIX B – Example of a Social Security Number Printout

APPENDIX C – Social Security Number Printouts by Region—Fiscal Year 2009 (Field Offices Only)

APPENDIX D – Recommendations and Agency Response from Audit, *Controls for Issuing Social Security Number Verification Printouts* (A-04-07-27112)

APPENDIX E – Scope and Methodology

APPENDIX F – Twenty-five Field Offices That Issued the Most Social Security Number Printouts—Fiscal Year 2009

APPENDIX G – Agency Comments

APPENDIX H – OIG Contacts and Staff Acknowledgments

## **Appendix A**

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### **Acronyms**

ATS	Audit Trail System
C.F.R.	Code of Federal Regulations
DMV	Department of Motor Vehicles
FY	Fiscal Year
IRTPA	<i>Intelligence Reform and Terrorism Prevention Act of 2004</i>
OI	Office of Investigations
OIG	Office of the Inspector General
OMB	Office of Management and Budget
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
SSN	Social Security Number
SSOLV	Social Security On-Line Verification
U.S.C.	United States Code
Web CIRP	Web-based Comprehensive Integrity Review Process

## ***Appendix B***

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### **Example of a Social Security Number Printout**

NUMI      DTE: 08/11/10    SSN: 000-00-0000    XC:    UNIT: OIG    PG: 001

#### **SOCIAL SECURITY ADMINISTRATION SOCIAL SECURITY NUMBER PRINTOUT**

**OUR RECORDS INDICATE THAT SOCIAL SECURITY NUMBER 000-00-0000  
IS ASSIGNED TO JOHN DOE**

**YOUR SOCIAL SECURITY CARD IS THE OFFICIAL VERIFICATION OF YOUR  
SOCIAL SECURITY NUMBER. THIS PRINTOUT DOES NOT VERIFY YOUR RIGHT  
TO WORK IN THE UNITED STATES.**

**PROTECT YOUR SOCIAL SECURITY NUMBER FROM FRAUD AND IDENTITY  
THEFT. BE CAREFUL WHO YOU SHARE YOUR NUMBER WITH.**

## Appendix C

### Social Security Number Printouts by Region— Fiscal Year 2009 (Field Offices Only)

Region	State	SSN Printouts	Region	State	SSN Printouts
1	Massachusetts	73,624	6	Texas	742,272
	Rhode Island	26,110		Louisiana	226,546
	Connecticut	18,160		Arkansas	75,664
	New Hampshire	12,496		New Mexico	68,103
	Maine	8,476		Oklahoma	33,218
	Vermont	8,278		<b>Total</b>	<b>1,145,803</b>
	<b>Total</b>	<b>147,144</b>			
2	New York	174,682	7	Missouri	208,793
	New Jersey	139,332		Kansas	42,801
	Puerto Rico	107,955		Nebraska	16,121
	Virgin Islands	3,330		Iowa	15,872
	<b>Total</b>	<b>425,299</b>		<b>Total</b>	<b>283,587</b>
3	Pennsylvania	238,666	8	Colorado	81,299
	Virginia	98,828		Utah	21,868
	Maryland	54,201		Montana	11,516
	District of Columbia	48,770		South Dakota	7,347
	Delaware	25,017		Wyoming	6,424
	West Virginia	17,757		North Dakota	4,469
	<b>Total</b>	<b>483,239</b>		<b>Total</b>	<b>132,923</b>
4	Florida	470,858	9	California	732,147
	Georgia	287,058		Arizona	77,307
	Alabama	211,436		Nevada	77,304
	North Carolina	188,278		Hawaii	16,018
	Tennessee	187,345		Guam	4,458
	South Carolina	157,971		American Soma	3,681
	Mississippi	155,060		Saipan	966
	Kentucky	136,462		<b>Total</b>	<b>911,881</b>
	<b>Total</b>	<b>1,794,468</b>			
5	Ohio	502,953	10	Washington	81,951
	Illinois	339,961		Oregon	52,475
	Michigan	273,854		Idaho	15,727
	Indiana	254,879		Alaska	15,291
	Wisconsin	101,819		<b>Total</b>	<b>165,444</b>
	Minnesota	37,134		<b>Total of Regions</b>	<b>7,000,388</b>
	<b>Total</b>	<b>1,510,600</b>		<b>Other SSA Components</b>	<b>14,494</b>
				<b>Total SSN Printouts</b>	<b>7,014,882</b>

# **Recommendations and Agency Response from Audit, *Controls for Issuing Social Security Number Verification Printouts* (A-04-07-27112)**

## **REVISED COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "CONTROLS FOR ISSUING SOCIAL SECURITY NUMBER VERIFICATION PRINTOUTS" (A-04-07-27112)**

Thank you for the opportunity to review and comment on the draft report. We agree that it is important to protect the integrity of the Social Security number (SSN) and the enumeration process while at the same time ensuring that people have appropriate access to information that would be necessary to gain employment and other services where the SSN is deemed essential. We also agree that there should be controls in place to ensure that the SSN Verification Printouts (SSN Printout) are not misused. However, any such procedures must comply with SSA's, the Office of Management and Budget's (OMB) and other applicable Privacy Act and disclosure guidelines. The procedures must also provide flexibility for individuals who need immediate SSN documentation, but cannot provide the required evidentiary documents due to circumstances beyond their control (i.e., victims of natural and unnatural disasters). Specific examples of situations where we have experienced a large number of requests include displaced individuals as a result of Hurricane Katrina and the September 11, 2001 terrorist attacks.

Our responses to the specific recommendations are provided below.

### **Recommendation 1**

Revise applicable Federal regulation and SSA policy governing individuals' right to access their personal information maintained in the Agency's system of records. Specifically, we believe these individuals should be required to present the same type of identity documents as replacement Social Security card applicants.

### **Response**

We partially agree. We believe that the applicable regulation (20 CFR 401.45) and policies for verifying identity are sufficient and establish requirements consistent with OMB Privacy Act Guidelines for providing individuals access to their records. These guidelines indicate that identity requirements should be kept to a minimum and ensure an individual is not granted improper access to records pertaining to another person. The guidelines also state that identity requirements should not unduly impede the individual's right to access. Imposing additional requirements for establishing identity may hinder the individual's legitimate right of access to his/her records and create an unnecessary workload for employees who receive these requests.

Nevertheless, we acknowledge the threat of identity theft, and agree to evaluate the effectiveness of improved controls to be implemented and will evaluate the current regulatory requirements to determine what additional regulatory or non-regulatory measures may be used to make disclosure of SSN printouts less vulnerable while ensuring that individuals' Privacy Act rights are not violated.

Current Program and Operations Manual System (POMS) instructions are very clear regarding the purpose of the SSN card compared to the SSN Printout. While the documents needed for identity purposes are not as stringent for an SSN Printout, the Numident does contain special indicator codes alerting personnel to verify identity. These special indicator codes may also prevent an SSN Printout from printing. Refer to RM 00202.320.F. *Procedure – SSN Verification Printout Request Generates Alert.*

### **Recommendation 2**

Establish an acceptable number of SSN Printouts an individual may obtain in a day, year or lifetime, and require specific management approval for requests exceeding that number.

#### **Response**

We partially agree. The Privacy Act establishes an individual's right of access to records maintained by Federal agencies without limiting the number of times those records can be requested. An SSN Printout is a record of an individual held by the Agency, and the Privacy Act and OMB Privacy Act guidelines do not limit access to such information. Additionally, the Agency's efforts to establish a limited number of times an individual may request SSN Printouts may be arbitrary in nature and may have a negative effect on his/her legitimate right of access to this information. Nevertheless, we acknowledge the need to balance responsibility for protecting SSNs with the obligation of providing individuals access to personal information in SSA's possession. Thus, we will assess the impact of limiting the number of SSN Printouts individuals may request on their Privacy Act rights.

We also have considerable concerns regarding the resources that would be necessary to implement the restrictions in this recommendation, since no misuse cases have been identified as a result of the generation of multiple printouts. As part of our efforts to prevent abuse or misuse of SSN Printouts, current POMS RM 00202.320.C.2 states, "*In general, you should issue no more than one verification printout to a requestor at the same interview/same day.*" However, the policy as written allows the interviewer flexibility to issue multiple printouts if needed or requested.

### **Recommendation 3**

Establish procedures to perform routine integrity reviews of anomalies involving the issuance of SSN Printouts. Any cases involving potential SSN misuse should be referred to OIG.

## Response

We partially agree. These actions will be captured through the Web-based Comprehensive Integrity Review Process (CIRP), which is scheduled for implementation in fiscal year 2008. We do not believe there is a need to establish special procedures for these cases. If abuse or misuse cases are identified through routine CIRP reviews, they will be referred to OIG for further action.

## **Recommendation 4**

Consider developing a system or application similar to the SS-5 Assistant to document and track actions taken to issue an SSN Printout.

## Response

We agree that it is important to track actions taken to issue an SSN Printout. We believe we currently have systems in place to obtain that data through the Audit Trail System and, by late fiscal year 2008, these actions will be captured through the WEB based CIRP process which is being developed. Also, as described in our response to recommendation 3, CIRP will track both Numidents and NUMI Lites (SSN Printouts). In addition to targeted criteria designated to monitor transactions involving sensitive queries, Web CIRP will also provide anomaly reports and listings of sensitive queries performed by each employee sortable by SSN, type and date. The Integrity Review Handbook contains instructions on the review and certification of potential fraud or abuse cases. Our POMS GN 04100 contains additional procedures for referral of cases to OIG.

## **Recommendation 5**

Develop and disseminate management information for the SSN Printout workload to responsible SSA personnel. At a minimum, the information should enable managers to identify anomalies in the number of SSN Printouts issued by field offices and to numberholders.

## Response

We partially agree. As indicated in our response to recommendation number 4, CIRP will make information available to managers on the verifications processed. We do not believe that multiple printouts alone are indicators of possible fraud, abuse or misuse. We reviewed the multiple printout cases identified in this audit and determined that none involved fraud, abuse or misuse.

## **Recommendation 6**

Clarify SSA policies and the SSN Printout language to consistently communicate the Agency's official position as to whether the document is valid for SSN verification purposes.

## Response

We agree. While our statement on the printout and policy clearly states, "the Social Security card is the official verification of a Social Security number," we agree that the SSN Printout can be confusing for the public and third parties as the title "SSN Verification Printout" is misleading. We will clarify POMS instructions and the wording on the SSN Printout to provide a consistent message; i.e., that the SSN Printout is not an official verification of an SSN. These actions will be completed by December 31, 2007.

## **Recommendation 7**

Extend outreach to employers, Department of Motor Vehicles (DMV) and other third parties in areas where the demand for SSN Printouts is high to raise the awareness that SSA offers verification services.

## Response

We agree. We will continue our outreach efforts with employers regarding the procedures and types of SSN verification services we provide. We will also remind our employees who perform outreach activities with DMVs and other third parties to raise the awareness that we offer various verification services.

## **Recommendation 8**

Issue a reminder to field office staff that SSN Printouts should only be issued when the numberholder expresses an immediate need for a verification of the SSN.

## Response

We disagree. Current policy does not dictate that the number holder express an "immediate need" for this information. As previously noted, the Privacy Act protects an individual's right to access his or her records. Furthermore, OMB's Privacy Act guidelines indicate that the granting of access may not be conditioned upon any requirement to state a reason or otherwise justify the need to gain access to a particular record.

# **Scope and Methodology**

To accomplish our objective, we performed the following steps.

- Reviewed pertinent sections of Federal laws, regulations, and the Social Security Administration's (SSA) policies and procedures.
- Reviewed Office of the Inspector General reports and other relevant documents.
- Obtained a data extract from SSA's Audit Trail System (ATS) that contained detailed information on all Social Security number (SSN) Printouts issued from Fiscal Year (FY) 2007 through March 31, 2010.
- Calculated the total SSN Printouts issued for FYs 2007 through 2009.
- Analyzed the FY 2009 ATS data to determine the
  - total number of SSN Printouts issued,
  - distribution of SSN Printouts by SSA field office,
  - 25 field offices that issued the most SSN Printouts,
  - total SSN Printouts issued by SSN—in a day and year, and
  - total SSN Printouts issued to field offices located within 30 miles of the United States-Mexico border.
- At the end of our audit, we obtained the most recent ATS SSN Printout data (April 2010 through March 2011) for the 25 field offices that issued the most SSN Printouts in FY 2009.
- Interviewed officials from 26 SSA field offices (including the 25 that issued the most SSN Printouts in FY 2009) to determine (1) their procedures for issuing SSN Printouts and (2) whether they received any management information regarding the SSN Printout workload.
- Visited 11 of the 26 field offices we interviewed to observe their procedures for processing SSN Printouts. In total, we observed SSA personnel issuing 69 SSN Printouts. We did not randomly select the SSN Printouts observed.
- Obtained follow-up information regarding the recommendations from our December 2007 report – *Controls for Issuing Social Security Number Verification Printouts*. Our review of internal controls was limited to obtaining an understanding of SSA's procedures and controls for issuing SSN Printouts. For our analysis, we generally relied

on data from SSA's ATS. We determined that these data were sufficiently reliable to satisfy our audit objectives. The SSA entities audited were the Offices of Operations, Retirement and Disability Policy, and General Counsel, Privacy and Disclosure. We conducted the audit from September 2010 through March 2011 in Atlanta, Georgia, and select SSA field offices. 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## **Appendix F**

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### **Twenty-five Field Offices That Issued the Most Social Security Number Printouts—Fiscal Year 2009**

	<b>Field Office Location</b>	<b>Social Security Number Printouts Issued</b>	<b>Replacement Cards Issued</b>	<b>Percent of Printouts to Replacement Cards</b>
<b>1</b>	Las Vegas, Nevada	<b>50,920</b>	79,950	<b>63.7%</b>
<b>2</b>	San Antonio, Texas	<b>36,780</b>	30,603	<b>120.2%</b>
<b>3</b>	Grand Prairie, Texas	<b>36,720</b>	32,478	<b>113.2%</b>
<b>4</b>	Houston (Southwest), Texas	<b>32,994</b>	37,521	<b>87.9%</b>
<b>5</b>	Cincinnati (Downtown), Ohio	<b>32,643</b>	19,460	<b>167.7%</b>
<b>6</b>	Mobile, Alabama	<b>31,424</b>	23,721	<b>132.5%</b>
<b>7</b>	Fort Worth, Texas	<b>30,561</b>	27,202	<b>112.3%</b>
<b>8</b>	Dallas (North), Texas	<b>30,173</b>	36,106	<b>83.6%</b>
<b>9</b>	Albuquerque, New Mexico	<b>30,082</b>	36,302	<b>82.9%</b>
<b>10</b>	Columbia, South Carolina	<b>29,414</b>	28,757	<b>102.3%</b>
<b>11</b>	Austin, Texas	<b>27,213</b>	38,725	<b>70.3%</b>
<b>12</b>	Columbus, Ohio	<b>26,731</b>	17,303	<b>154.5%</b>
<b>13</b>	West Palm Beach, Florida	<b>26,245</b>	29,906	<b>87.8%</b>
<b>14</b>	Sacramento, California	<b>26,190</b>	37,729	<b>69.4%</b>
<b>15</b>	Birmingham, Alabama	<b>25,325</b>	21,765	<b>116.4%</b>
<b>16</b>	El Paso, Texas	<b>25,188</b>	28,480	<b>88.4%</b>
<b>17</b>	Charlotte, North Carolina	<b>24,878</b>	42,398	<b>58.7%</b>
<b>18</b>	Shreveport, Louisiana	<b>24,816</b>	21,862	<b>113.5%</b>
<b>19</b>	Jackson, Mississippi	<b>24,526</b>	23,937	<b>102.5%</b>
<b>20</b>	Atlanta (West), Georgia	<b>24,315</b>	20,455	<b>118.9%</b>
<b>21</b>	Indianapolis, Indiana	<b>24,224</b>	21,523	<b>112.5%</b>
<b>22</b>	Indianapolis (East), Indiana	<b>24,054</b>	21,689	<b>110.9%</b>
<b>23</b>	Pensacola, Florida	<b>24,021</b>	20,193	<b>119.0%</b>
<b>24</b>	Indianapolis (West), Indiana	<b>22,997</b>	21,481	<b>107.1%</b>
<b>25</b>	Houston (Southeast), Texas	<b>22,987</b>	23,312	<b>98.6%</b>

## **Appendix G**

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### **Agency Comments**



## SOCIAL SECURITY

### MEMORANDUM

Date: November 22, 2011 Refer To: S1J-3

To: Patrick P. O'Carroll, Jr.  
Inspector General

From: Dean S. Landis /s/  
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Controls for Issuing Social Security Number Printouts" (A-04-11-11105)--INFORMATION

Thank you for the opportunity to review the draft report. Please see our revised comments concerning recommendation number two.

Please let me know if we can be of further assistance. You may direct staff inquiries to Frances Cord at (410) 966-5787.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,  
“CONTROLS FOR ISSUING SOCIAL SECURITY NUMBER PRINTOUTS”  
(A-04-11-11105)**

**General Comments**

We appreciate your acknowledgment of our actions in response to your December 2007 report, “Controls for Issuing Social Security Number Verification Printouts.” Safeguarding the integrity of the Social Security number (SSN) is one of our top priorities. In the vast majority of cases, we correctly issue printouts in response to legitimate requests from members of the public.

We support efforts to reduce the demand for printouts, and to minimize the printouts’ vulnerability to fraud or misuse. Based on the concerns raised in your report, we will evaluate the overall SSN printout process and revise our policies and internal controls in order to limit SSN printouts. These revisions will include additional management information and automated tools that will provide increased management oversight. Automated support for some integrity and management information initiatives may require significant computer system enhancements. The pace of those enhancements depends in large part on available funding.

**Recommendation 1**

Establish a limit on the number of SSN Printouts an individual may obtain in a day, year, and lifetime and require specific management approval for requests that exceed that limit.

**Response**

We agree. We plan to revise our policy to limit the number of printouts an individual may obtain.

**Recommendation 2**

Establish procedures that enable management to identify instances when the issuance of SSN Printouts may be reduced and enhance management oversight.

**Response**

We agree. We plan to develop additional easily accessible and easy-to-use SSN printout management information that will give managers sufficient tools to oversee the SSN printouts issued by employees in their office, making routine integrity reviews unnecessary.

**Recommendation 3**

Require management approval prior to issuing an SSN Printout to an individual who provides insufficient or no identity documents.

### **Response**

We disagree. As we stated in our general comments and in response to your other recommendations, we support adding additional tools that will improve management's ability to monitor this activity as well as controls that will help ensure that printout issuances conform to our policies. Additionally, we plan to do a full review of our printout policies to identify areas where we can further improve our identity requirements. However, we do not believe that management review of every request involving insufficient or nonexistent documentation would be cost effective in light of our other, planned enhancements.

### **Recommendation 4**

Develop and implement a cost-effective method for controlling and accounting for the issuance of SSN Printouts.

### **Response**

We agree.

### **Recommendation 5**

Develop and disseminate management information for the SSN Printout workload to responsible SSA personnel. At a minimum, the information should enable managers to identify anomalies in the number of SSN Printouts issued by field offices and to numberholders.

### **Response**

We agree. The planned management information enhancements will allow managers to identify anomalies in the SSN printouts issued.

### **Recommendation 6**

Issue a reminder to field office staff to issue SSN Printouts in accordance with SSA policy. We believe the reminder should advise that staff should not issue SSN Printouts to every replacement SSN card applicant. SSA should also remind field office staff to obtain a signed form from all individuals, who do not have adequate identification, stating they are who they claim to be.

### **Response**

We agree.

## **Appendix H**

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# OIG Contacts and Staff Acknowledgments

### ***OIG Contacts***

Kimberly A. Byrd, Director

Frank Nagy, Audit Manager

### ***Acknowledgments***

In addition to those named above:

Mike Leibrecht, Senior Auditor

For additional copies of this report, please visit our Website at <http://oig.ssa.gov> or contact the Office of the Inspector General's Public Affairs Staff at (410) 965-4518. Refer to Common Identification Number A-04-11-11105.

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The Office of the Inspector General (OIG) is comprised of an Office of Audit (OA), Office of Investigations (OI), Office of the Counsel to the Inspector General (OCIG), Office of External Relations (OER), and Office of Technology and Resource Management (OTRM). To ensure compliance with policies and procedures, internal controls, and professional standards, the OIG also has a comprehensive Professional Responsibility and Quality Assurance program.

### **Office of Audit**

OA conducts financial and performance audits of the Social Security Administration's (SSA) programs and operations and makes recommendations to ensure program objectives are achieved effectively and efficiently. Financial audits assess whether SSA's financial statements fairly present SSA's financial position, results of operations, and cash flow. Performance audits review the economy, efficiency, and effectiveness of SSA's programs and operations. OA also conducts short-term management reviews and program evaluations on issues of concern to SSA, Congress, and the general public.

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OI conducts investigations related to fraud, waste, abuse, and mismanagement in SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, third parties, or SSA employees performing their official duties. This office serves as liaison to the Department of Justice on all matters relating to the investigation of SSA programs and personnel. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

### **Office of the Counsel to the Inspector General**

OCIG provides independent legal advice and counsel to the IG on various matters, including statutes, regulations, legislation, and policy directives. OCIG also advises the IG on investigative procedures and techniques, as well as on legal implications and conclusions to be drawn from audit and investigative material. Also, OCIG administers the Civil Monetary Penalty program.

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OER manages OIG's external and public affairs programs, and serves as the principal advisor on news releases and in providing information to the various news reporting services. OER develops OIG's media and public information policies, directs OIG's external and public affairs programs, and serves as the primary contact for those seeking information about OIG. OER prepares OIG publications, speeches, and presentations to internal and external organizations, and responds to Congressional correspondence.

### **Office of Technology and Resource Management**

OTRM supports OIG by providing information management and systems security. OTRM also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, OTRM is the focal point for OIG's strategic planning function, and the development and monitoring of performance measures. In addition, OTRM receives and assigns for action allegations of criminal and administrative violations of Social Security laws, identifies fugitives receiving benefit payments from SSA, and provides technological assistance to investigations.