
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**MONITORING CONTROLS FOR
THE HELP AMERICA VOTE
VERIFICATION PROGRAM**

November 2010

A-03-09-29114

AUDIT REPORT



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SOCIAL SECURITY

MEMORANDUM

Date: November 5, 2010

Refer To:

To: The Commissioner

From: Inspector General

Subject: Monitoring Controls for the Help America Vote Verification Program
(A-03-09-29114)

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) had effective monitoring controls to ensure States were using the Help America Vote Verification (HAVV) program appropriately.

BACKGROUND

On October 29, 2002, the President signed into law the *Help America Vote Act of 2002*¹ (HAVA), which mandates that States verify the information of newly registered voters. Section 303 of HAVA requires that each State establish a computerized statewide voter registration list and verify voter information with the State's Motor Vehicle Administration (MVA) or SSA. The States are required to verify against the State's MVA database the applicant's driver's license number if he or she has a current, valid driver's license. If the applicant does not have a current, valid driver's license, the States are to verify the applicant's name and date of birth (DOB) as well as the last four digits of the applicant's Social Security number (SSN) with SSA. In addition, SSA is required to report whether its records indicate an applicant is deceased.

To comply with the section 303 requirement for SSA to verify information using the last four digits of the SSN, SSA developed HAVV, an online system that allows MVAs to submit the required voter applicant information for verification. SSA receives the verification request from the American Association of Motor Vehicle Administrators (AAMVA), which receives the data from each State's MVA.² HAVV uses the last four digits of the SSN to perform the initial match against the Alphident, a database that

¹ Pub. L. No. 107-252 § 303, 42 U.S.C. § 15483. See also the *Social Security Act* § 205(r)(8), 42 U.S.C. § 405(r)(8).

² AAMVA assists all MVAs and SSA by serving as an electronic information conduit between them. Additionally, AAMVA bills each State for their use of the HAVV program.

allows SSA to search the Agency’s master file of all assigned SSNs based on name and DOB. The resulting matched record(s) are compared with SSA’s Numident File, which is the repository of all issued SSNs.³

In Fiscal Years (FY) 2008 and 2009, SSA processed approximately 14.9 million HAVV verification requests submitted by 41 States,⁴ about 7.7 million verification requests in FY 2008, and approximately 7.2 million verification requests in FY 2009 (see Table 1).

Table 1: HAVV Transactions for FYs 2008 and 2009

| Verification Responses | FY 2008 | FY 2009 |
|-------------------------------------|------------------|------------------|
| Unprocessed (invalid data provided) | 3,824 | 3,442 |
| No-Matches | 2,366,922 | 1,887,682 |
| Matches | 5,323,408 | 5,305,530 |
| Total HAVV Transactions | 7,694,154 | 7,196,654 |

Currently the Agency does not have policies and procedures in place to determine and/or enforce State compliance with the HAVA. We believe SSA is in a unique position regarding the HAVA, in that the law establishes the Agency as the Federal entity with the available information to be able to determine State compliance. As such, we believe SSA should consider implementing policies and procedures that help promote HAVA compliance among the States. Such policies and procedures could help ensure the States comply with the terms, conditions, and privacy safeguards established in HAVV user agreements and include policies and procedures to monitor compliance with system security requirements.

SCOPE AND METHODOLOGY

For our review, we obtained and reviewed HAVV transactions processed in FYs 2008 and 2009. In addition, we contacted the top 10 States with the highest number of transactions submitted in FY 2008 to gain a better understanding of their policies and practices for using SSA’s HAVV program. See Appendix B for additional information about our scope and methodology.

³ The Numident is a record of identifying information (such as name, DOB, date of death, mother’s maiden name, etc.) provided by the applicant on his or her *Application for a Social Security Number* (Form SS-5) for an original SSN card and subsequent applications for replacement SSN cards. Each record is housed in the Numident Master File.

⁴ As of July 2009, 46 states and territories signed a Memorandum of Understanding with SSA to use the HAVV program. It is optional for seven States to use HAVV because these States permit the use of the full SSN for voter registration.

RESULTS OF REVIEW

Based on our review, we believe SSA could improve its monitoring controls of the HAVV program so it can detect anomalies that may indicate States are not using the program appropriately. While SSA had determined in FY 2008 that at least six States had submitted an excessive number of verification requests, the Agency was not aware a significant portion of the verification requests in FYs 2008 and 2009 related to the same voter information being re-submitted numerous times throughout the year. For these transactions, States re-submitted the same voter information (last four digits of the SSN, last name, first name, and DOB) 10 or more times during the FY, and SSA provided them with the same verification response.⁵ In FY 2008, we found that 2.4 million (32 percent) of the 7.7 million transactions were re-submissions, and in FY 2009, about 1.4 million (20 percent) of the 7.2 million transactions were re-submissions.

SSA staff stated they did not detect the re-submissions because HAVV was not designed to detect these types of transactions. Further, they believed the States were responsible for detecting anomalies with their own data. Based on discussions with officials from the top 10 States who submitted 6.5 million verifications in FY 2008, of which about 2.3 million (36 percent) related to the same voter information being submitted 10 or more times, we found the following.

- Six States were not aware, and could not explain, why the same voter information was re-submitted numerous times.
- Four States indicated staff erroneously re-verified voters who changed their voter information or verification requests were re-submitted automatically because of system errors.
- Six States indicated they did not have any controls or safeguards in place to detect when voter information was unnecessarily re-submitted through HAVV.

With respect to responses from the States, we believe SSA and the States need to work together to ensure data submitted through the HAVV program are appropriate. Therefore, we believe SSA should provide States with reports that reflect each State's use of the HAVV program. These reports would be a useful tool for States to detect anomalies, such as re-submissions of the same voter information. Also, it could help ensure States are using HAVV as intended, thereby strengthening the integrity of the HAVV program. In addition, SSA should consider developing a process that would detect when States submit through HAVV an excessive number of verification requests using the same voter information.

⁵ While there may be legitimate reasons why States re-submitted individual voter information for verification through HAVV (for example, name or address change), we considered the verification of the same voter information 10 or more times in the same year to be excessive.

MONITORING CONTROLS

Our review of HAVV data for FYs 2008 and 2009 showed States had submitted the same voter information 10 or more times during the FY, which did not appear reasonable. In FY 2008, we found that 2.4 million (32 percent) of the 7.7 million HAVV transactions submitted by 25 States related to the same voter data being re-submitted 10 or more times. These transactions related to 61,869 applicants whose information was submitted 10 to 1,778 times during the year (see Table 2). For example, Ohio submitted the same voter information 1,778 times during the year for a 77-year-old man who died in December 2005. The 1,778 submissions were over an 11-day period from August 29 to September 26, 2008 and ranged from 1 to 278 times in a day. Further, we found Ohio continued to submit this applicant's information 13,824 times in FY 2009.

Table 2: Summary of Excessive Re-Submissions in FY 2008

| Range of Re-Submissions | Number of Individuals | Percent of Individuals | Total Number of Re-Submissions |
|-------------------------|-----------------------|------------------------|--------------------------------|
| 10 to 20 | 34,576 | 56 | 471,184 |
| 21 to 30 | 10,432 | 17 | 261,954 |
| 31 to 40 | 3,727 | 6 | 133,820 |
| 41 to 50 | 3,787 | 6 | 185,384 |
| 51 to 1,778 | 9,347 | 15 | 1,383,326 |
| Total | 61,869 | 100 | 2,435,668 |

Additionally, we found that 22 States re-submitted the same voter information on the same day. Specifically, these States submitted the same voter information for 22,059 applicants on the same day with the highest being 342 times on the same day. For example, Illinois submitted the same voter information 342 times on April 23, 2008 for a 37-year-old man who received a matched response each time.

The excessive number of re-submissions continued to be a problem in FY 2009 even though the number of re-submissions had decreased slightly. As shown in Table 3, approximately 1.4 million (20 percent) of the 7.2 million verification requests were re-submissions.⁶ These transactions related to 6,073 applicants whose information was submitted 10 to 27,969 times during the year by 28 States. We found Ohio submitted the majority of these re-submitted transactions. It submitted 770,585 (54 percent) of the 1.4 million re-submitted transactions in FY 2009. The second highest was Nevada, which submitted 329,156 transactions representing 23 percent.

⁶ See Appendix D for a list of the States that had an excessive number of re-submissions in FY 2009.

Table 3: Summary of Excessive Re-Submissions in FY 2009

| Range of Re-Submissions | Number of Individuals | Percent of Individuals | Total Number of Re-Submissions |
|-------------------------|-----------------------|------------------------|--------------------------------|
| 10 to 20 | 1,648 | 27 | 20,708 |
| 21 to 30 | 435 | 7 | 10,393 |
| 31 to 40 | 240 | 4 | 8,675 |
| 41 to 50 | 213 | 4 | 9,803 |
| 51 to 27,969 | 3,537 | 58 | 1,374,974 |
| Total | 6,073 | 100 | 1,424,553 |

While SSA determined in October 2008 that six States submitted an excessive number of verification requests in FY 2008, it was not aware that about 41 percent of the verification requests related to the same voter information being submitted 10 or more times (see Table 4). In October 2008, SSA sent letters to the Secretaries of State for six States—Nevada, Georgia, Ohio, Alabama, Indiana, and North Carolina—indicating they had submitted a volume of verification requests that was much greater than one would expect given that States of comparable or larger populations had submitted a significantly lower number of verification requests.⁷ In total, the six States submitted approximately 5.3 million, or 69 percent of the 7.7 million verification requests processed in FY 2008. SSA asked the States to determine why they had such a high volume of verification requests and to ensure the States were verifying only newly registered voters who did not have suitable State-issued identification, as required by HAVA. SSA was not aware that about 2.2 million (41 percent) of the 5.3 million verification requests were related to the same voter information being submitted 10 or more times during the FY. For example, Georgia submitted approximately 2 million verification requests to SSA and we found that about 1.6 million (79 percent) of these requests related to voters whose information was re-submitted during the year.

Table 4: Summary of FY 2008 Transactions for Six States Informed About Excessive Transactions

| States | Total Transactions | Excessive Re-Submissions | Percent of Re-Submissions |
|----------------|--------------------|--------------------------|---------------------------|
| Georgia | 1,956,464 | 1,552,188 | 79 |
| Alabama | 1,037,372 | 9,625 | 1 |
| Nevada | 744,913 | 576,365 | 77 |
| Ohio | 741,132 | 32,746 | 4 |
| Indiana | 415,517 | 542 | 0.1 |
| North Carolina | 395,155 | 2,066 | 1 |
| Total | 5,290,553 | 2,173,532 | 41 |

We spoke with SSA staff about the excessive number of re-submissions of voter information, and they indicated that the HAVV program was not designed to track these types of transactions. In addition, they did not believe SSA or AAMVA caused this problem to occur, since not all States that were using the HAVV program experienced

⁷ See Appendix C for an example of the letter sent to Georgia.

the problem. Given that the number of transactions submitted 10 or more times during the FY were submitted by a few States, they believed those States were responsible for detecting these types of anomalies.

Top 10 States

We contacted officials from the top 10 States that submitted verification requests in FY 2008 to gain a better understanding of their policies and practices for using HAVV. In addition, we asked whether they had any controls in place to detect anomalies, such as the excessive re-submission of voter information. Six of the top 10 States were among those who received a letter from SSA regarding their excessive verification requests. The top 10 States accounted for 85 percent (6.5 million) of the total transactions submitted for verification in FY 2008 (see Table 5). Furthermore, about 2.3 million (36 percent) of the 6.5 million transactions related to the same voter data being re-submitted 10 or more times. In FY 2009, these States accounted for 62 percent, or 4.5 million of the total transactions submitted, of which 1.3 million (30 percent) were re-submissions of the same voter information.

Table 5: Top 10 States with Submissions in FYs 2008 and 2009

| States | FY 2008 | Excessive Re-Submissions | | FY 2009 | Excessive Re-Submissions | |
|----------------|------------------|--------------------------|-----------|------------------|--------------------------|-----------|
| | Transactions | Transactions | Percent | Transactions | Transactions | Percent |
| Georgia | 1,956,464 | 1,552,188 | 79 | 179,531 | 6,184 | 3 |
| Alabama | 1,037,372 | 9,625 | 0.9 | 570,158 | 1,949 | 0.3 |
| Nevada | 744,913 | 576,365 | 77 | 419,332 | 329,156 | 78 |
| Ohio | 741,132 | 32,746 | 4 | 1,642,267 | 770,585 | 47 |
| Indiana | 415,517 | 542 | 0.1 | 305,903 | 312 | 0.1 |
| California | 410,777 | 164,506 | 40 | 369,964 | 198,543 | 54 |
| North Carolina | 395,155 | 2,066 | 0.5 | 308,620 | 10 | 0.0 |
| New York | 337,940 | 1,575 | 0.5 | 374,135 | 9,882 | 3 |
| Pennsylvania | 262,054 | 0 ¹ | 0.0 | 126,331 | 20 | 0.0 |
| New Jersey | 205,300 | 6,303 | 3 | 199,660 | 12,347 | 6 |
| Total: | 6,506,624 | 2,345,916 | 36 | 4,495,901 | 1,328,988 | 30 |

Note 1: While Pennsylvania did not submit voter applicants 10 or more times during FY 2008, we included it because it was among the top 10 States that submitted the highest number of transactions. In addition, we found that Pennsylvania had 1,008 transactions involving the same voter information being re-submitted 4 to 8 times a year. These re-submissions represented about 4 percent of their total transactions in FY 2008.

Based on discussions with officials from the top 10 States, we learned that 6 States were unaware they had re-submitted the same voter information through HAVV. These officials could not explain how or why newly registered voters were re-submitted during the FY. Officials from the remaining four States were aware of the re-submissions of voter information, and they provided the following explanations.

- Georgia informed us that, in response to the October 2008 letter from SSA, it determined the re-submissions of the same voter information occurred because of a programming error. The system used to submit HAVV data created a “loop” wherein verification requests from nightly batches that were not fully completed by SSA remained in a holding queue and were cycled repeatedly through the process as the system attempted to complete the entire batch. In response to the letter, they corrected the programming error in October 2008. As a result, the number of re-submissions decreased significantly from 79 percent in FY 2008 to only 3 percent in FY 2009.
- Nevada confirmed that clerks were erroneously re-verifying voters who had any change to their voter information (for example, party affiliation). According to the representatives, to resolve this issue, the State changed its policy in August 2009 and now requires that individuals be re-verified when critical identifying information, such as name or SSN, is changed.
- California explained that the re-submissions of the same voter information occurred because of how its system was designed. Similar to Georgia, if records are pending in California’s system, these records will continue to be re-submitted to SSA until the entire file is processed. At the time of our audit, California had not changed or planned to change its system to correct this problem. Consequently, California continued to submit the same voter information 10 or more times in FY 2009. The percent of these re-submissions increased in FY 2009 to 54 percent from 40 percent in FY 2008.
- Ohio informed us that there was an error with the voter registration system used by two counties in the State, which involved deceased voters. However, the error was fixed in August 2010 by installing enhanced software to its voter registration system. In addition, the State changed its policy to verify only newly registered voter information.

Additionally, we found that 6 of the 10 States indicated they did not have controls or safeguards in place to detect instances where the same voter information was submitted numerous times through HAVV. For example, officials from North Carolina stated they did not see a need to have controls or safeguards in place to detect these types of transactions because, before our audit, they were unaware of the excessive number of re-submissions of the same voter information. Officials from Alabama stated they were using an off-the-shelf system to submit their HAVV data, and this system was not designed to check for the re-submission of the same voter information.

With respect to the responses from the States, we believe SSA and the States need to work together to ensure the data submitted through the HAVV program are appropriate. As such, they need to coordinate their efforts to detect anomalies, such as the excessive re-submissions of voter information, which could indicate that HAVV is not being used as intended. If SSA had provided the States with reports that reflected each State’s use of the HAVV program, we believe the States would have been in a better

position to detect the re-submissions that occurred in FYs 2008 and 2009. We found that in FY 2010, SSA began sending quarterly reports with a breakout of each State's usage to AAMVA, which is the organization that assists SSA and the States by serving as an electronic information conduit between them. This information was provided to assist AAMVA with billing the States for their use of HAVV. However, AAMVA was not sharing these reports with the States because it did not bill based on each State's usage of the HAVV program. AAMVA divides the total cost for the HAVV program equally and bills each State the same amount, regardless of the number of submissions by each State. We believe SSA needs to determine methods to ensure States receive usage reports because these reports could be a useful tool for the States to detect anomalies with the HAVV data, which would strengthen the integrity of the HAVV program.

CONCLUSION AND RECOMMENDATIONS

SSA needs to improve its monitoring controls of the HAVV program so it can detect anomalies that may indicate when States are not using the program appropriately. We found that SSA's monitoring controls did not detect that States submitted the same voter information 10 or more times in FYs 2008 and 2009. In FY 2008, the re-submissions accounted for about 32 percent of the total transactions processed, and in FY 2009, it accounted for 20 percent of the total transactions processed. Based on feedback from 4 of the 10 States we reviewed, the excessive re-submissions occurred because employees erroneously re-verified voters who changed the voter information and verification requests were re-submitted automatically because of system glitches. However, the remaining six States reviewed could not explain how or why the re-submissions had occurred. Therefore, to strengthen the integrity of the HAVV program, we recommend SSA:

1. Consider methods to provide States with reports that reflect each State's usage of the HAVV program as these reports could help States ensure they are using the HAVV program as intended.
2. Consider developing a process that would detect when States submit through HAVV an excessive number of verification requests using the same voter information.

AGENCY COMMENTS AND OIG RESPONSE

SSA agreed with Recommendation 1 but did not agree with Recommendation 2. The Agency responded that it already tracks data by States, and has identified situations where States may be submitting excessive verification requests. In addition, the Agency stated that in response to our first recommendation, it may begin giving States reports that reflect actual HAVV usage, and, with this information, the States themselves will be able to investigate any anomalies. Also, the Agency believes the development of a new process would require significant resources for systems development, and these costs would have to be passed on to the States, since HAVV is

non-programmatic activity. As a final note, the Agency believes in light of its current process, it is unnecessary to develop a process to detect when States are repeatedly submitting the same data.

The Agency's comments are included in Appendix E.

OIG RESPONSE

We appreciate SSA's comments and while we encourage SSA to provide the States with reports that reflect the actual HAVV usage, we believe these reports alone may not be useful to States in identifying such anomalies as the re-submission of the same voter information. For example, of the six States that SSA notified in 2008 about excessive verification requests, only two States had determined the excessive verification requests were related to the re-submissions of the same voter information. The remaining four States were not aware of the re-submission problems until our audit. Finally, we understand that the development of a new process may require additional system resources, and the costs for these resources would have to be borne by the States. However, the States may be willing to absorb these additional costs as several States indicated they were interested in receiving additional correspondence from SSA notifying them of possible problems with their data or verification process. Therefore, SSA should work with the States to develop a process that will help ensure the data submitted through the HAVV program are appropriate.



Patrick P. O'Carroll, Jr.

Appendices

APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Example of Letter Sent to the Secretary of State for Georgia

APPENDIX D – States with Excessive Re-Submissions of Voter Information in
Fiscal Years 2008 and 2009

APPENDIX E – Agency Comments

APPENDIX F – OIG Contacts and Staff Acknowledgments

Acronyms

| | |
|-------------|--|
| AAMVA | American Association of Motor Vehicle Administrators |
| DOB | Date of Birth |
| HAVA | <i>Help America Vote Act of 2002</i> |
| HAVV | Help America Vote Verification |
| FY | Fiscal Year |
| MVA | Motor Vehicle Administration |
| Pub. L. No. | Public Law Number |
| SSA | Social Security Administration |
| SSN | Social Security Number |
| U.S.C | United States Code |

Scope and Methodology

To accomplish our objective, we:

- Reviewed relevant Federal laws and regulations, as well as relevant Social Security Administration (SSA) policies and procedures.
- Reviewed Office of the Inspector General reports, Government Accountability Office reports, and other relevant documents.
- Obtained and analyzed Help America Vote Verification (HAVV) transactions processed in Fiscal Years (FY) 2008 and 2009.
- Obtained and reviewed FYs 2008 and 2009 management information reports for the HAVV program.
- Obtained and analyzed the matching criteria SSA uses for the HAVV program.
- Spoke with staff from SSA and the Election Assistance Commission to gain a better understanding of the *Help America Vote Act of 2002* requirements.
- Conducted interviews with the following 10 States: Alabama, California, Georgia, Indiana, Nevada, New Jersey, New York, North Carolina, Ohio, and Pennsylvania. The selection was based on the highest number of transactions submitted in FY 2008. We also selected these States because they represented about 85 percent of the total transactions processed; had a wide range of non-matches; had a wide range of re-submissions of the same voter information; and represented a majority of the U.S. population.

We conducted our review between November 2009 and July 2010 in Philadelphia, Pennsylvania. We tested the data obtained for our audit and determined the data to be sufficiently reliable to meet our audit objective. The entities audited were the Offices of Earnings, Enumeration and Administrative Systems under the Office of the Deputy Commissioner for Systems and Financial Policy and Operations under the Office of the Deputy Commissioner for Budget, Finance and Management. 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 objective.

Example of Letter Sent to Secretary of State for Georgia



SOCIAL SECURITY

The Commissioner

October 3, 2008

The Honorable Karen Handel
Secretary of State
214 State Capitol
Atlanta, GA 30334

Dear Ms. Handel:

Under the Help America Vote Act of 2002, we have an agreement with your State to assist in verifying newly-registered voters. Consistent with this statute, part of this agreement requires us to verify the last 4 digits of the Social Security numbers of individuals who do not have an acceptable State-issued identification, such as a valid driver's license.

Since October 1, 2007, however, we have received nearly two million requests for verification from your State. Such a volume appears to be much greater than one would expect, given that States of comparable or larger populations have a significantly lower number of verification requests.

I ask that you look into this matter to ensure that your election officials are verifying only those newly-registered voters who do not have suitable State-issued identification. If your State's election officials are requesting verifications not covered by the verification agreement, we ask that you bring your procedures into conformance with your legal obligations.

If you or your staff has any questions, please contact Pete Monaghan at (410) 966-9972.

Thank you for your prompt attention to this matter.

Sincerely,

/s/

Michael J. Astrue

States with Excessive Re-Submissions of Voter Information in Fiscal Years 2008 and 2009

In Fiscal Year (FY) 2008, 41 States submitted about 7.7 million transactions to the Social Security Administration (SSA) for verification through the Help America Vote Verification (HAVV) program. As shown in Table 1, approximately 2.4 million or 32 percent of these transactions related to same voter information (last four digits of the Social Security number [SSN], last name, first name, and date of birth [DOB]) being submitted 10 or more times during the FY and receiving the same verification response from SSA. We found that 25 of the 41 States had re-submitted the same voter information, which represented .1 to 88 percent of their transactions for FY 2008. Further, the re-submissions related to 61,869 applicants whose information was submitted 10 to 1,778 times during the year.

In FY 2009, 41 States submitted approximately 7.2 million transactions to SSA for verification through the HAVV program. We found that approximately 1.4 million or 20 percent of these transactions related to same voter information being submitted 10 or more times by 28 States. For the 28 States, the re-submissions represented less than one-hundredth of a percent up to 98 percent of the total transactions submitted in FY 2009 (see Table 2). In addition, these re-submitted transactions related to 6,073 applicants whose information was submitted 10 to 27,969 times during the year.

Table 1: Summary of States with Excessive Re-Submissions in FY 2008

| Total Transactions | | | Re-Submissions ¹ | | | |
|--------------------|----------------|------------------|-----------------------------|------------------------|---------------|--------------------|
| | State | Transactions | Transactions | Percent Re-Submissions | Applicants | Range |
| 1 | Georgia | 1,956,464 | 1,552,188 | 79 | 55,115 | 10 to 139 |
| 2 | Nevada | 744,913 | 576,365 | 77 | 2,979 | 10 to 251 |
| 3 | California | 410,777 | 164,506 | 40 | 928 | 10 to 312 |
| 4 | Texas | 205,093 | 86,378 | 42 | 717 | 10 to 1107 |
| 5 | Ohio | 741,132 | 32,746 | 4 | 646 | 10 to 1,778 |
| 6 | Alabama | 1,037,372 | 9,625 | 1 | 765 | 10 to 194 |
| 7 | New Jersey | 205,300 | 6,303 | 3 | 330 | 10 to 88 |
| 8 | North Carolina | 395,155 | 2,066 | 1 | 162 | 10 to 50 |
| 9 | New York | 337,940 | 1,575 | 1 | 13 | 11 to 499 |
| 10 | Oregon | 93,409 | 623 | 1 | 44 | 10 to 46 |
| 11 | Indiana | 415,517 | 542 | 0.1 | 43 | 10 to 26 |
| 12 | Massachusetts | 48,564 | 474 | 1 | 11 | 10 to 339 |
| 13 | Illinois | 8,915 | 422 | 5 | 3 | 10 to 375 |
| 14 | Montana | 33,760 | 373 | 1 | 21 | 10 to 57 |
| 15 | South Dakota | 13,404 | 252 | 2 | 3 | 12 to 128 |
| 16 | Iowa | 41,505 | 247 | 1 | 17 | 10 to 30 |
| 17 | Nebraska | 14,184 | 243 | 2 | 21 | 10 to 15 |
| 18 | Missouri | 147,766 | 208 | 0.1 | 13 | 10 to 74 |
| 19 | New Hampshire | 184 | 162 | 88 | 14 | 10 to 21 |
| 20 | Wyoming | 22,574 | 110 | 1 | 6 | 10 to 33 |
| 21 | Arizona | 58,758 | 90 | 0.2 | 8 | 10 to 14 |
| 22 | Utah | 10,003 | 83 | 1 | 2 | 11 to 72 |
| 23 | Idaho | 40,170 | 55 | 0.1 | 5 | 10 to 13 |
| 24 | Alaska | 742 | 22 | 3 | 2 | 10 to 12 |
| 25 | Wisconsin | 17,600 | 10 | 0.1 | 1 | 10 |
| Total | | 7,001,201 | 2,435,668 | 35 | 61,869 | 10 to 1,778 |

Note 1: For this report, a re-submission means a State submitted the same voter information (last four digits of the SSN, last name, first name, and DOB) 10 or more times during a FY and received the same verification response from SSA.

Table 2: Summary of States with Excessive Re-Submissions in FY 2009

| Total Transactions | | | Re-Submissions ¹ | | | |
|--------------------|----------------|------------------|-----------------------------|------------------------|--------------|---------------------|
| | State | Transactions | Transactions | Percent Re-Submissions | Applicants | Range |
| 1 | Ohio | 1,642,267 | 770,585 | 47 | 520 | 10 to 27,969 |
| 2 | Nevada | 419,322 | 329,156 | 78 | 2,484 | 10 to 214 |
| 3 | California | 369,964 | 198,543 | 54 | 878 | 10 to 312 |
| 4 | Texas | 159,511 | 54,722 | 34 | 214 | 10 to 8,244 |
| 5 | New Hampshire | 38,132 | 37,427 | 98 | 847 | 10 to 283 |
| 6 | New Jersey | 199,660 | 12,347 | 6 | 546 | 10 to 179 |
| 7 | New York | 374,135 | 9,882 | 3 | 138 | 10 to 643 |
| 8 | Georgia | 179,531 | 6,184 | 3 | 27 | 229 to 230 |
| 9 | Alabama | 570,158 | 1,949 | 0.3 | 157 | 10 to 32 |
| 10 | Oregon | 68,455 | 1,484 | 2 | 113 | 10 to 48 |
| 11 | Illinois | 1,518,166 | 441 | 0 | 39 | 10 to 27 |
| 12 | Massachusetts | 57,707 | 377 | 0.7 | 3 | 13 to 345 |
| 13 | Indiana | 305,903 | 312 | 0.1 | 19 | 10 to 48 |
| 14 | Missouri | 142,623 | 181 | 0.1 | 11 | 10 to 38 |
| 15 | Idaho | 44,348 | 173 | 0.4 | 11 | 10 to 56 |
| 16 | Nebraska | 14,716 | 154 | 1 | 14 | 10 to 13 |
| 17 | Minnesota | 33,324 | 148 | 0.4 | 12 | 10 to 17 |
| 18 | Wyoming | 16,197 | 95 | 0.6 | 8 | 10 to 16 |
| 19 | Montana | 21,268 | 94 | 0.4 | 8 | 10 to 16 |
| 20 | Iowa | 31,180 | 65 | 0.2 | 5 | 10 to 17 |
| 21 | Arizona | 30,446 | 42 | 0.1 | 4 | 10 to 11 |
| 22 | Wisconsin | 134,414 | 39 | 0 | 3 | 10 to 16 |
| 23 | Alaska | 1,132 | 36 | 3 | 2 | 16 to 20 |
| 24 | Arkansas | 25,096 | 34 | 0.1 | 3 | 10 to 12 |
| 25 | Utah | 12,528 | 28 | 0.2 | 2 | 13 to 15 |
| 26 | Colorado | 32,753 | 25 | 0.1 | 2 | 10 to 15 |
| 27 | Pennsylvania | 126,331 | 20 | 0 | 2 | 10 |
| 28 | North Carolina | 308,620 | 10 | 0 | 1 | 10 |
| Total: | | 6,877,887 | 1,424,553 | 21 | 6,073 | 10 to 27,969 |

Note 1: For this report, a re-submission means a State submitted the same voter information (last four digits of the SSN, last name, first name, and DOB) 10 or more times during a FY and received the same verification response from SSA.

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: October 25, 2010 **Refer To:** S1J-3

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

From: James A. Winn /s/
Executive Counselor to the Commissioner

Subject: Office of the Inspector General (OIG) Draft Report, "Monitoring Controls for the Help America Vote Verification Program" (A-03-09-29114)--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. Please direct staff inquiries to Rebecca Tothero, Acting Director, Audit Management and Liaison Staff, at (410) 966-6975.

Attachment

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, “MONITORING CONTROLS FOR THE HELP AMERICA VOTE VERIFICATION PROGRAM” (A-03-09-29114)

Thank you for the opportunity to review the subject report. We offer the following responses to your recommendations.

Recommendation 1

Consider methods to provide States with reports that reflect each State’s usage of the Help America Vote Verification (HAVV) program as these reports could help States ensure they are using the HAVV program as intended.

Response

We agree. We will explore methods to provide States with reports that reflect each State’s usage of the HAVV program.

Recommendation 2

Consider developing a process that would detect when States submit through HAVV an excessive number of verification requests using the same voter information.

Response

We disagree. We already track data by State and identify situations where States may be submitting excessive verification requests. You acknowledge this on page 3 of your draft report where you state, “While SSA had determined in FY 2008 that at least six States had submitted an excessive number of verification requests...” We will continue this process and alert States whenever appropriate. In addition, and as noted above, we may also begin giving the States reports that reflect actual HAVV usage. With this information, the States themselves will be able to investigate any anomalies.

You suggest we do more in this area and recommend we develop a process to detect when States are repeatedly submitting the same data. We feel this is unnecessary. If we adopted your idea, we would have to expend significant resources for systems development. We would then have to pass related costs onto the States because HAVV is a non-programmatic activity. As such, we cannot fund it using the Social Security trust funds. This option would likely be an undesirable option from the States’ perspective, and as previously stated, we feel it is unnecessary in light of our existing processes.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Cylinda McCloud-Keal, Director, Philadelphia Audit Division

Carol Madonna, Audit Manager

Acknowledgments

In addition to those named above:

Virginia Harada, Senior Auditor

Michael Brooks, Auditor

Atlanta Audit Division

Birmingham Audit Division

Chicago Audit Division

Falls Church Audit Division

New York Audit Division

San Francisco Audit Division

For additional copies of this report, please visit our Website at www.socialsecurity.gov/oig or contact the Office of the Inspector General's Public Affairs Staff Assistant at (410) 965-4518. Refer to Common Identification Number A-03-09-29114.

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