
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**NONCITIZENS ISSUED MULTIPLE
SOCIAL SECURITY NUMBERS**

December 2012

A-06-10-20155

AUDIT REPORT



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.**

Vision

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.

MEMORANDUM

Date: December 10, 2012

Refer To:

To: The Commissioner

From: Inspector General

Subject: Noncitizens Issued Multiple Social Security Numbers (A-06-10-20155)

OBJECTIVE

Our objective was to determine whether Social Security Administration (SSA) controls ensured the Agency's information systems properly identified noncitizens who obtained multiple Social Security numbers (SSN).

BACKGROUND

When SSA assigns an SSN to an individual, the Agency creates a master record of relevant information about the numberholder in its Numident file. This information includes, but is not limited to, the numberholder's name, date of birth, place of birth, gender, parents' names, and citizenship status.¹

Generally, SSA will assign an individual only one SSN. Under certain circumstances, SSA can approve issuance of an additional SSN. The most common circumstances include when evidence clearly indicates the numberholder's SSN has been misused, that he/she is disadvantaged by that particular misuse, and the misuse affects his/her credit record. When SSA issues an individual more than one SSN, the Agency must cross-refer the SSNs to properly credit the individual's earnings to his/her earnings record and prevent payment of duplicate claims.

Noncitizens may apply for an SSN through a local SSA field office. SSA also has agreements with the Departments of Homeland Security (DHS) and State to assist SSA in enumerating noncitizens admitted as lawful permanent residents. If a lawful permanent resident wishes to apply for an original SSN under the enumeration-at-entry (EAE) process the Department of State collects enumeration data during the immigrant visa process, and electronically transmits the data to DHS. When

¹ Certain numberholder information, like last name or citizenship status, can change over time. SSA does not update the Numident unless numberholders report these changes.

the lawful permanent resident is admitted into the United States, DHS electronically transmits the enumeration data to SSA so that an SSN can be assigned, eliminating the need to file an SSN application at an SSA field office.²

We initiated this review in response to a criminal case where a noncitizen fraudulently obtained approximately \$55,000 in Federal housing and Supplemental Security Income payments. The individual concealed her earnings by obtaining and using two SSNs—one for employment purposes and the other to obtain low-income benefits through the Department of Housing and Urban Development and SSA. The individual was sentenced to 10 months in Federal prison and ordered to pay restitution.

Numident records indicated that both SSNs used in the fraud scheme contained identical first and similar last names. The SSNs also contained identical dates and places of birth and fathers' names. For this review, we focused on instances where non-cross-referred SSNs contained matching first, middle, and last names; dates and places of birth; gender; and mothers' and fathers' names. See Appendix C for additional information on our scope and methodology.

RESULTS OF REVIEW

SSA developed and implemented controls to prevent issuance of multiple SSNs to noncitizens (for additional background, see Appendix B). However, SSA's records indicated that, on occasion, the controls did not prevent the unauthorized issuance of multiple SSNs to noncitizens.³

We identified 4,317 instances where the Numident record of 2 SSNs assigned to noncitizens contained matching first, middle, and last names; dates and places of birth; gender; and fathers' and mothers' names. In each case, SSA had not cross-referred the records, indicating that SSA either was not aware it assigned two SSNs to the same noncitizen or it believed the numberholders were not actually the same person.⁴

These SSNs were issued because controls did not always prevent issuance of two SSNs when noncitizens submitted multiple SSN applications or obtained an SSN through both the EAE process and an SSN application submitted in an SSA office.⁵

² SSA, POMS, RM 10205.600.A (effective April 3, 2012).

³ According to SSA, excluding SSNs issued to U.S. citizens through the enumeration at birth process, SSA issues about 1.3 million new SSNs each year. The 4,317 cases represent a small fraction of new SSN issuances.

⁴ It is possible that foreign-born twins with the same first, middle, and last names both immigrated to the United States and obtained SSNs. However, SSA's enumeration records do not denote these instances.

⁵ We previously identified control weaknesses associated with the EAE process and recommended corrective action in reports, *Assessment of the Enumeration at Entry Process* (A-08-04-14093), March 15, 2005, and *Follow-up: Assessment of the Enumeration at Entry Process*, (A-08-07-17143), March 20, 2008.

Noncitizens who obtain multiple SSNs can use the SSNs to commit fraud against various Federal programs or conceal work activity.

Multiple Non-Cross-Referred SSNs Issued to Noncitizens

SSA's records indicated that, in 4,116 cases, the noncitizens obtained both SSNs by filing applications in SSA offices. In 201 instances, noncitizens received 1 SSN via the EAE process and the other by submitting an SSN application at an SSA office.

Timing and Proximity of SSN Card Issuances

In most cases, the same office processed both SSN applications within 30 days of each other, making it more likely the same individual obtained both SSNs.

| Table 1. Time Lapse Between SSNs Issued | | | |
|--|--------------------------------------|--|--------------|
| Days | Enumerated in the Same Office | Enumerated in Different Offices⁶ | Total |
| Same Day | 251 | 76 | 327 |
| 1-7 Days | 1,252 | 180 | 1,432 |
| 8-30 Days | 948 | 213 | 1,161 |
| 31-100 Days | 509 | 133 | 642 |
| Over 100 Days | 360 | 395 | 755 |
| Total | 3,320 | 997 | 4,317 |

- Of the 251 cases enumerated on the same day in the same office, 216 occurred before Calendar Year 2000. Seven of eight cases that occurred during Calendar Years 2009 to 2011 involved SSNs issued via the EAE process.
- In cases where SSA issued the SSNs on the same day, but from different offices, we determined that, in most instances, the SSA offices were in relative proximity to each other,⁷ making it more likely the same individual applied for both SSNs. For example, SSA issued same-day pairs of SSNs from the Brooklyn Card Center and the Brooklyn Flatbush, New York, field office; the Southeast and Downtown field offices in Houston, Texas; and the Chinatown and Downtown field offices in San Francisco, California. However, even in instances where the issuing field offices were not in proximity to each other, SSA records indicated the same individuals obtained both SSNs. For example, SSA records show that, on the same day in 1989, siblings from Mexico obtained SSNs from SSA offices in both Texas and California.

⁶ Includes 57 instances where the Numident record for one of the SSN pairs did not identify the specific SSA office that processed the original SSN issuance.

⁷ In 56 of 76 instances, the SSA offices were located within 100 miles of each other.

Same Alien Registration Number Used for Both SSNs

An Alien Registration Number (ARN) is a unique identifier DHS issues to noncitizens. In most cases, SSA's enumeration records did not include an ARN. However, in 58 cases, enumeration records for both SSNs cited the same ARN, indicating SSA issued the same individual two SSNs or two different people obtained SSNs using the same ARN.⁸

SSA System Controls Preventing Duplicate SSN Issuance

Analysis of duplicate SSN issue dates indicated that SSA's system controls had become more effective at preventing inadvertent issuance of multiple SSNs to the same individual. The frequency of occurrence of these cases has declined significantly—SSA issued about 87 percent of the duplicate SSNs before Calendar Year 2001.

| Period | Number of Duplicate SSNs Issued | Percent |
|---------------------------|---------------------------------|---------|
| 2001 to 2011 ⁹ | 542 | 12.6 |
| 1991 to 2000 | 1,487 | 34.4 |
| 1981 to 1990 | 2,288 | 53.0 |
| Total | 4,317 | 100.0 |

Potential for Fraud

We initiated this review in response to a criminal case where a noncitizen obtained and used two SSNs to defraud Federal benefit programs.¹⁰ For all 4,317 instances where SSA issued 2 SSNs to noncitizens whose Numident records matched, we reviewed SSA records for claims and earnings activity. We did not identify any instances where SSA issued benefit payments under both SSNs. However, we identified other activity on these records that indicated potential abuse or fraud.¹¹

- In 514 instances, SSA's records indicated that work activity was reported under both SSNs. In 170 cases, at least 5 years of earnings were reported under both SSNs; in 80 of the 170 cases, at least 10 years of earnings were reported under both SSNs.

⁸ SSA informed us that in October 2011, it enhanced its automated process to check enumeration records for duplicate ARNs and will not issue a different SSN if found.

⁹ Our analysis included all matching records as of August 2011.

¹⁰ At the time of our review, SSA had not cross-referred the SSNs or annotated both records to include fraud indicator codes. We worked with the Agency to update the records.

¹¹ We did not attempt to contact any of the numberholders identified during our review. In most cases, the individuals were not Social Security beneficiaries, so SSA's records did not identify the individuals' addresses or telephone numbers. However, we referred a number of specific cases to our Office of Investigations for potential criminal investigation.

For these records, the potential exists for the same individual to obtain multiple disability or retirement benefits.¹² SSA's earnings records indicated that

- ✓ an individual used one SSN for earnings from 1991 to 2000 and the other SSN for earnings from 2000 to 2011.
- ✓ an individual used one SSN for earnings from 1984 to 1994 and the other SSN for earnings from 1995 to 2006.
- In five cases, work activity occurred under one SSN at the same time SSA was paying disability benefits under the other SSN. In these instances, earnings were not significant enough to affect benefit eligibility. However, it demonstrates the potential for illicit use of a second SSN.
- In one case, SSA's records indicated one numberholder was alive, but the other numberholder was deceased. A review of earnings and claim activity on both SSNs did not detect any fraudulent activity. However, the potential for fraud exists if these records are not cross-referred.

We discussed the six cases above with SSA's Office of Operations staff who agreed that SSA issued two SSNs to the same individuals and took action to cross-refer the SSNs associated with these cases.

CONCLUSION AND RECOMMENDATION

SSA controls designed to prevent issuance of multiple SSNs to noncitizens have been effective at preventing these occurrences, and the number of such cases has declined significantly over the past 30 years. However, SSA's records indicated that, on occasion, the controls did not prevent the unauthorized issuance of multiple SSNs to noncitizens. We identified 4,317 instances where SSA assigned noncitizens two SSNs with matching first, middle, and last names; dates and places of birth; gender; and fathers' and mothers' names. Noncitizens who obtain multiple SSNs have used, or could use, the SSNs to defraud Federal benefit programs or to conceal work activity. As a result, we recommend that SSA cross-reference the SSN pairs, as appropriate.

AGENCY COMMENTS

SSA agreed with our recommendation. See Appendix D for the Agency's comments.



Patrick P. O'Carroll, Jr.

¹² Individuals earn Social Security "credits" by working and paying Social Security taxes. Individuals can earn up to 4 credits per year and can qualify for disability benefits with as few as 6 credits and retirement benefits with 40 credits.

Appendices

APPENDIX A – Acronyms

APPENDIX B – Additional Background

APPENDIX C – Scope and Methodology

APPENDIX D – Agency Comments

APPENDIX E – OIG Contacts and Staff Acknowledgments

Acronyms

| | |
|------|----------------------------------|
| ARN | Alien Registration Number |
| DHS | Department of Homeland Security |
| EAE | Enumeration-at-Entry |
| POMS | Program Operations Manual System |
| SSA | Social Security Administration |
| SSN | Social Security Number |

Additional Background

The Social Security Administration (SSA) developed policies and procedures to prevent issuance of multiple Social Security numbers (SSN) to the same individual. For example, when a noncitizen applies for an SSN in an SSA office, he/she is required to present immigration documentation. In these cases, SSA personnel should request an Alphident query using the name shown on a visa or passport, or Department of Homeland Security documentation. If a possible SSN is identified, SSA personnel should obtain applicable Numident records and compare the noncitizen's name, date of birth, gender, alien registration number, place of birth, and parents' names to determine whether the SSN(s) belonged to the noncitizen.¹

Moreover, SSA developed system controls to prevent issuance of multiple SSNs to the same individual. SSA's enumeration system matches data from all SSN applications received on a given day against data from all other applications received the same day. In addition, SSA's automated enumeration screening process matches new applications for an original SSN against all existing SSN records. If specific data elements on the request for SSN match an existing SSN, SSA issues a replacement SSN card instead of assigning a new SSN. When the elements match closely, but not exactly, SSA sends the information to its Office of Operations for further review.

¹ SSA, POMS, RM 10205.600.E (effective April 3, 2012).

Scope and Methodology

To accomplish our objective, we:

- Interviewed Social Security Administration (SSA) personnel to gain an understanding of SSA's enumeration process.
- Reviewed SSA procedures for issuing Social Security numbers (SSN) to noncitizens and familiarized ourselves with system controls designed to prevent issuance of SSNs to individuals who previously obtained SSNs.
- Analyzed SSA's Numident file to identify instances where enumeration records for more than one non-citizen contained matching first name, middle initial or name,¹ last name, date of birth, place of birth, gender, mother's name, and father's name. Our review included only enumeration records that identified the numberholder as a non-U.S. citizen. We removed all instances where SSA had cross-referred the matching records, indicating SSA was already aware it had issued multiple SSNs to the same individual.
- Reviewed SSA's Master Beneficiary Record, Supplemental Security Record, and Summary of Earnings Query for each matching record.
- Analyzed matching SSN pairs to determine or identify (a) when and where SSA issued each SSN, (b) the enumeration source(s), (c) the length of time between SSN issuances, and (d) records with matching alien registration numbers.
- Provided selected cases to SSA staff for review and verification.

We performed our review from August 2011 through June 2012 in Dallas, Texas. The entity audited was the Office of Earnings, Enumeration and Administrative Systems under the Office of the Deputy Commissioner for Systems. We tested the data obtained for our audit and determined they were sufficiently reliable to meet our objective. We conducted this 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.

¹ Our audit population included instances where (a) a middle initial or name appeared on only one record, (b) a middle initial appeared on one record that matched the first letter of a middle name that appeared on the other record, or (c) a middle name did not appear on either record.

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: November 9, 2012

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, "Noncitizens Issued Multiple Social Security Numbers" (A-06-10-20155)—INFORMATION

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

Please let me know if we can be of further assistance. You may direct staff inquiries to Amy Thompson at (410) 966-0569.

Attachment

**COMMENT ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,
“NONCITIZENS ISSUED MULTIPLE SOCIAL SECURITY NUMBERS”
(A-06-10-20155)**

Recommendation 1

We recommend that SSA cross-reference the Social Security number pairs, as appropriate.

Response

We agree.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Ron Gunia, Director, Dallas Audit Division

Jason Arrington, Audit Manager

Acknowledgments

In addition to those named above:

Ashley Moore, Auditor-in-Charge

Wanda Renteria, Senior Auditor

Teresa Williams, 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-06-10-20155.

Overview of the Office of the Inspector General

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.

Office of Investigations

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.

Office of External Relations

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.

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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.