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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**FOLLOW-UP: ASSESSMENT OF THE  
ENUMERATION AT ENTRY PROCESS**

**March 2008**

**A-08-07-17143**

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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.**

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- 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.**

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# SOCIAL SECURITY

## MEMORANDUM

Date: March 20, 2008

Refer To:

To: The Commissioner

From: Inspector General

Subject: Follow-up: Assessment of the Enumeration at Entry Process (A-08-07-17143)

## OBJECTIVE

The objectives of our review were to assess the effectiveness of the Enumeration at Entry (EAE) process and determine the status of corrective actions the Social Security Administration (SSA) had taken to address recommendations in our March 2005 report, *Assessment of the Enumeration at Entry Process*.

## BACKGROUND

The EAE process<sup>1</sup> allows immigrants who are age 18 or older and lawfully admitted as permanent residents to apply for an original or replacement Social Security number (SSN) card<sup>2</sup> on the Department of State's (State) Form DS-230, *Application for Immigrant Visa and Alien Registration*. Once the Department of Homeland Security (DHS) admits the immigrant,<sup>3</sup> it electronically transmits to SSA certain data elements needed for SSN assignment. Using these data, SSA's Modernized Enumeration System (MES) processes the record, assigns an SSN and mails the SSN card to the address the immigrant provided to State or DHS. Since EAE's inception, SSA has issued over 380,000 SSN cards to EAE participants.<sup>4</sup> According to SSA's data, it is much more cost-effective to issue an SSN through EAE. In Fiscal Year (FY) 2007, it cost about \$31 and \$4 to process an SSN application at an SSA field office and through EAE, respectively.<sup>5</sup>

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<sup>1</sup> SSA Program Operations Manual System, section RM 00202.315.

<sup>2</sup> Requests for SSN replacement cards through EAE are made when immigrants have previously been in the United States under a temporary work visa and, during that stay, obtained an original SSN. However, since that time, they may have misplaced their card or changed their name or immigration status.

<sup>3</sup> We use the term "immigrant" to refer to those noncitizens whom DHS admitted as permanent residents.

<sup>4</sup> SSA's EAE count is from November 2002 to October 31, 2007.

<sup>5</sup> For our 2005 review, SSA advised it cost about \$24 and \$10 in FY 2004 to process an SSN application at an SSA field office and through EAE, respectively.

Our March 2005 report highlighted weaknesses in controls and operations that we believed SSA needed to address to enhance the efficiency and effectiveness of the EAE process. SSA agreed to

- enhance its duplicate record and previously assigned SSN edits<sup>6</sup> to provide greater protection against multiple SSN assignment;
- reemphasize to field office personnel the importance of appropriate enumeration feedback message (EM)<sup>7</sup> resolution to avoid multiple SSN assignment;
- cross-reference multiple SSNs the Agency assigned to immigrants we identified during our review;
- continue to work with State and DHS to provide clear instructions to immigrants on SSN attainment;
- consider providing its handout regarding SSN attainment to immigrants in their native languages; and
- continue to work with State and DHS to resolve data incompatibility issues, including name standardization.

To accomplish the objectives of this review, we visited four SSA field offices to learn how EAE affects SSA field operations. We also reviewed 37 EAE records that MES could not process (pending records) and discussed possible causes with field office management.<sup>8</sup> To learn more about DHS' role in the EAE process, we visited two ports of entry in California and New York. We also obtained a data extract of original SSNs SSA assigned through EAE from July 1 through December 31, 2006. For our 6-month audit period, we identified a population of 44,084 original SSNs the Agency assigned to EAE applicants. From this population, we randomly selected 250 SSNs to determine whether SSA assigned multiple SSNs to the same individual. Because of State's and DHS' roles in the EAE process, we will provide copies of this report to the Inspectors General of those agencies. Appendix B includes a detailed description of our scope, methodology and sample appraisal.

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<sup>6</sup> When SSA's MES processes SSN applications, it runs "edit routines" to determine whether any (1) duplicate applications were submitted on the same date and (2) records on the SSN master file contain applicant information similar to that shown on an incoming SSN application.

<sup>7</sup> When MES cannot process an SSN application because it finds data in SSA's records that conflict with the data on the application, it sends the field office an EM the next day. (SSA Modernized Systems Operations Manual [MSOM] MES 004.001.B.)

<sup>8</sup> We asked each of the 4 field offices we visited to provide 10 pending EAE records for our review. However, one office only had seven records available.

## **RESULTS OF REVIEW**

We commend SSA for its EAE initiative and believe it could help strengthen SSN integrity and assist the Agency in improving its service to immigrants. Although SSA disagreed with one of the seven recommendations from our 2005 review, it agreed with and took action on six. However, our current audit determined that weaknesses in controls and operations identified in 2005 continue. As suggested in our previous report, we believe SSA needs to address these weaknesses to improve the efficiency and effectiveness of the EAE process.

We estimate SSA assigned 2,116 multiple SSNs to immigrants through EAE during our 6-month audit period. This figure represents about 5 percent of the 44,084 original SSNs the Agency assigned to EAE applicants during this time. Furthermore, immigrants continued to apply for SSNs through EAE and at field offices, resulting in a duplication of effort for SSA. Additionally, MES could not process 16,053 (11 percent) of the 147,422 EAE records SSA received in FY 2007<sup>9</sup> because of data incompatibility issues. Although the EAE process shows significant promise, we believe SSA must resolve these weaknesses before it expands EAE to other groups of noncitizens.

### **SSA CONTINUED TO ASSIGN MULTIPLE SSNs TO IMMIGRANTS**

During our 2005 review, we projected that SSA assigned multiple SSNs to 11 percent of immigrants who received an SSN through EAE. We concluded that SSA erroneously assigned these SSNs because (1) SSA system edits did not identify previously assigned SSNs or multiple SSN applications or (2) field office personnel improperly resolved EMs. In response to our recommendations, SSA cross-referenced the multiple SSNs we identified and issued a reminder to field offices on resolving EAE-related EMs. To address our recommendation to enhance its duplicate record<sup>10</sup> and previously assigned SSN edits for EAE applicants, the Agency elected to create an alert in SS-5 Assistant.<sup>11</sup> This alert prompts SSA employees to search for potential EAE applications whenever an SSN applicant presents evidence of immigrant status.

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<sup>9</sup> Although the audit period for the sample of 250 SSNs assigned through EAE was from July to December 2006, we chose to review unprocessed records from the most recent 1-year period available.

<sup>10</sup> When an individual submits more than one SSN application to SSA, the additional applications are considered duplicate records.

<sup>11</sup> SS-5 Assistant is a Microsoft Access-based application that works in conjunction with MES to process SSN applications.

Based on the results of this review, we remain concerned about the assignment of multiple SSNs. Despite SSA's efforts to address this issue, we estimate it assigned 2,116 multiple SSNs to immigrants who received an SSN through EAE during our 6-month audit period (see Appendix B, Table 1).<sup>12</sup> This figure represents about 5 percent of the 44,084 original SSNs the Agency assigned to EAE applicants during this time.

Although multiple SSN assignment has declined since our 2005 review, we believe a 5-percent error rate is undesirable, and SSA should make changes in its EAE process. If SSA does not address weaknesses in its controls and operations and all variables remain constant, we estimate SSA will assign multiple SSNs to about 21,160 immigrants over the next 5 years.<sup>13</sup> Making EAE less vulnerable to the issuance of multiple SSNs is particularly important given SSA's interest in expanding EAE to other groups of noncitizens.

We have provided SSA with the list of multiple SSNs we identified and requested that it cross-refer the numberholders' Numidents. The causes for assignment of multiple SSNs are discussed in greater detail in the following sections.

### **System Edits Did Not Identify Duplicate Applications Processed on the Same Date or Previously Assigned SSNs**

In 2005, SSA assigned about 78 percent of the projected multiple SSNs to immigrants because system edits did not identify duplicate applications processed on the same date or previously assigned SSNs. Based on the results of our current review, we estimate SSA improperly assigned approximately 1,411 (67 percent) of the projected 2,116 multiple SSNs during our audit period because system edits did not identify duplicate applications or previously assigned SSNs (see Appendix B, Estimate 1).

When MES processes an SSN application, it searches for previously assigned SSNs or duplicate applications submitted on the same day. We found some searches failed because of variances in the applicant's names. In one case, the EAE record had a single first name while the field office-created record had a compound first name. We believe SSA should enhance its edit routines to include data unique to each immigrant.

Accordingly, we recommend that SSA implement systems changes to propagate alien registration numbers<sup>14</sup> to the Numident records of all immigrants who apply for SSNs—

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<sup>12</sup> None of the immigrants in our sample with multiple SSNs had earnings posted to more than one SSN record.

<sup>13</sup> We based this estimate on the projected number of immigrants who received multiple SSNs during our review, and projected it over the next 5 years. Therefore, we calculated our estimate as follows: 2,116 for 6 months X 2 = 4,232 per year X 5 years = 21,160.

<sup>14</sup> The alien registration number is the nine-digit number following "A" that is shown on the I-551, *Permanent Resident Card*, and on certain other immigration documents and notices.

regardless of whether the individuals apply for SSNs through EAE or at a field office.<sup>15</sup> Additionally, the Agency should enhance its system edits to include a search on the alien registration number. We acknowledge that not all noncitizens applying for SSNs will have an alien registration number. For example, temporary visitors may only have an admission number annotated on an I-94, *Arrival/Departure Record*. However, when available, we believe propagating the alien registration number to the Numident file would enhance the Agency's ability to perform accurate system edits and integrity reviews. In fact, we believe that, if SSA had used the alien registration number in its searches, most of the multiple SSNs issued in our audit period could have been prevented.

### **Field Office Personnel Improperly Resolved EMs**

Our previous review found that SSA assigned about 22 percent of the multiple SSNs because field office personnel improperly resolved EMs. While our current audit identified that the improper resolution of EMs by field office personnel continues, we found fewer instances of incorrectly processed EMs.<sup>16</sup> Based on the results of our current review, we estimate SSA improperly assigned approximately 705 (33 percent) of the projected 2,116 multiple SSNs during our audit period because field office personnel incorrectly processed EMs (see Appendix B, Estimate 2).

SSA instructions for EM resolution require that field office personnel compare Numident information (name, date and place of birth, gender, alien status, and parents' names) with the corresponding data on the incoming EAE record to determine whether a match exists.<sup>17</sup> If field office personnel determine there is a previously assigned SSN, they should record the Numident SSN on the incoming EAE application, which will cause MES to issue a replacement card. However, if field office personnel fail to do so, MES will assign an original SSN.

For the improperly resolved EMs in our current sample, we found that immigrants' first and last names and dates of birth on the duplicate records were identical. While there were some variations in parents' names or applicants' places of birth, there was enough information on SSA's Numident and the incoming EAE application to clearly indicate the records belonged to the same individual. SSA representatives reviewed these cases and agreed that each set of records appeared to belong to one individual. If SSA would include alien registration numbers on immigrants' Numidents and use these numbers in its searches, we believe these data would assist field office personnel in more

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<sup>15</sup> SSA records immigrants' alien registration numbers in MES but only propagates these numbers to the Numidents of those who apply for SSNs through EAE.

<sup>16</sup> In 2005, there were 27 multiple SSNs identified, 6 of which involved EMs. In our current review, there were only 12 multiple SSNs, 4 of which involved EMs. Both audit samples consisted of 250 records.

<sup>17</sup> MSOM, MES 004.002 (EM-3).



accurately resolving EMs. To further ensure accuracy, we recommend that SSA periodically conduct random reviews of EM resolutions and take appropriate measures to improve field offices' processing of EMs.

### **IMMIGRANTS CONTINUED TO APPLY FOR SSNs THROUGH EAE AND FIELD OFFICES**

Our 2005 review reported that about 56 percent of the immigrants with multiple SSNs visited an SSA field office within 1 week of entering the country. We concluded that some immigrants applied for SSNs through EAE and at field offices because the Agency's instructional handout (provided to the immigrant at a Foreign Service post) was not always in the individual's native language. In response to our recommendations, SSA and State redrafted the handout to provide clear instructions on SSN attainment in immigrants' native languages. In May 2007, State instructed its Foreign Service posts to provide translated copies of the revised handouts to immigrants.

Based on the results of this review, we estimate that about 1,234 (58 percent) of the projected 2,116 immigrants with multiple SSNs visited a field office within 1 week of entering the country (see Appendix B, Estimate 3).<sup>18</sup> Because our audit period ended in December 2006, before the date State began issuing the revised handout, we were unable to determine the impact of the revised handout. Accordingly, we believe SSA should periodically assess its EAE process to determine whether immigrants continue to apply for SSNs through EAE and field offices. This assessment should help SSA determine whether further steps are needed to educate immigrants about the EAE process.

### **DATA INCOMPATIBILITY ISSUES CONTINUED TO PREVENT PROCESSING OF SOME EAE RECORDS**

During our 2005 review, we determined that MES could not process 26 percent of the EAE records SSA received because of data incompatibility issues among the Agency, State and DHS. We found that State and/or DHS input invalid characters, such as commas, periods, and blank spaces, mostly in the *address* fields. As a result, MES placed the unprocessed records in a "pending" file. However, SSA policy does not require that field office personnel contact individuals whose SSN applications cannot be processed. Therefore, many of these EAE applicants would have visited field offices to obtain SSNs, ultimately defeating the purpose of EAE by increasing field office workloads and Agency administrative costs. In response to our recommendation to

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<sup>18</sup> We determined that 7 (58 percent) of the 12 immigrants with multiple SSNs visited a field office within 1 week of entering the United States.



work with State and DHS to resolve data incompatibility issues,<sup>19</sup> SSA met with State.<sup>20</sup> In addition, SSA elected to strip invalid characters from the address fields of EAE SSN applications. However, the Agency did not agree with our recommendation to contact EAE applicants to resolve pending records.

Based on the results of this review, MES could not process 16,053 (11 percent) of the 147,422 EAE records SSA received in FY 2007. Our analysis of 37 pending EAE records revealed that 28 (76 percent) failed to process because State and/or DHS input characters, such as commas, apostrophes, hyphens, and spaces, in the applicant's *place of birth* and *parents' name* fields. Had MES processed these applications, we estimate the Agency could have saved approximately \$497,643 in FY 2007, assuming all immigrants later obtained an SSN through a field office.<sup>21</sup> When we discussed our finding with SSA systems personnel, they advised us that the nature of the data in these fields is different from data in the address fields, and stripping the invalid characters could result in SSA creating incorrect data.

Although the number of unprocessed EAE SSN applications decreased, we remain concerned that 1 of every 10 EAE applicants cannot obtain an SSN unless they visit a field office. We believe SSA's pending EAE records would diminish significantly if State and DHS would eliminate incompatible data. Furthermore, resolution of the data incompatibility issue remains important given SSA's interest in expanding EAE to other groups of noncitizens. As such, we recommend that SSA continue to work with State and DHS to encourage those agencies to discontinue input of data incompatible with SSA's systems.

We also recommend that SSA review and correct pending EAE applications, and, if necessary, contact the applicant to do so. Although the Agency rejected a similar recommendation in our 2005 audit, one field office advised us it successfully processes most of its pending EAE records. In fact, this office stated that records pending because of invalid characters, such as commas and periods, could be cleared without ever contacting the EAE applicant. Given SSA's commitment to delivering high-quality service, field offices should attempt to resolve pending EAE applications. We believe doing so would be more cost-effective than requiring that EAE applicants visit field offices to obtain their SSNs.

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<sup>19</sup> Because this recommendation included that SSA work with State and DHS regarding name standardization, the Agency stated it implemented a policy change that requires that field offices issue SSN cards to noncitizens in the name that appears on their immigration document.

<sup>20</sup> Although SSA sent a letter to State and DHS requesting a meeting, DHS did not attend.

<sup>21</sup> We based this estimate on the number of EAE records MES could not process in FY 2007 (16,053), using SSA's FY 2007 unit cost to process an SSN application at a field office (\$31). Therefore, we calculated our estimate as follows:  $16,053 \times \$31 = \$497,643$ .

## CONCLUSION AND RECOMMENDATIONS

We recognize SSA has taken steps to enhance the integrity of the EAE process. We also realize that SSA must rely on support from State and DHS. Because it is much more cost-effective to assign SSNs through EAE than through field offices, we believe EAE should be expanded to include other categories of noncitizens. However, weaknesses continue to exist in the Agency's controls and operations, and we believe SSA needs to address these weaknesses before expanding this process. Ultimately, the success of SSA's efforts will depend on the priority it places on improving existing controls and operations and how successful it is in obtaining assistance and support from State and DHS.

Accordingly, we recommend that SSA:

1. Cross-reference multiple SSNs the Agency assigned to immigrants identified during our review.
2. As soon as practicable, implement systems changes to propagate alien registration numbers to the Numidents of all immigrants who apply for SSNs.
3. Once alien registration numbers are propagated, enhance system edits to include a search on these numbers.
4. Periodically conduct random reviews of EM resolutions and take appropriate measures to improve field offices' processing of EMs.
5. Periodically assess its EAE process to determine whether immigrants continue to apply for SSNs through EAE and field offices. If trends continue, SSA should use this assessment to determine further steps needed to educate immigrants about the EAE process.
6. Work with State and DHS to encourage those agencies to discontinue input of data incompatible with the Agency's systems.
7. Review and correct pending EAE applications or perform an analysis to determine the cost of correcting these applications versus the cost of requiring EAE applicants to visit a field office.

## **AGENCY COMMENTS AND OIG RESPONSE**

SSA generally agreed with our recommendations. SSA only partially agreed with Recommendations 2 and 3. However, we believe the Agency's response and planned actions adequately address all of our recommendations.

SSA also provided technical comments that we considered and incorporated. SSA's comments are included in Appendix C.

A handwritten signature in black ink, appearing to read "Pat P. O'Carroll, Jr.", with a stylized flourish at the end.

Patrick P. O'Carroll, Jr.

# *Appendices*

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[APPENDIX A](#) – Acronyms

[APPENDIX B](#) – Scope, Methodology and Sample Appraisal

[APPENDIX C](#) – Agency Comments

[APPENDIX D](#) – OIG Contacts and Staff Acknowledgments

### Acronyms

DHS	Department of Homeland Security
State	Department of State
EAE	Enumeration at Entry
EM	Enumeration Feedback Message
FY	Fiscal Year
MES	Modernized Enumeration System
MSOM	Modernized Systems Operations Manual
SSA	Social Security Administration
SSN	Social Security Number

### Forms

DS-230	<i>Application for Immigrant Visa and Alien Registration</i>
I-551	<i>Permanent Resident Card</i>
I-94	<i>Arrival/Departure Record</i>

### Scope, Methodology and Sample Appraisal

To accomplish our objectives, we reviewed the Social Security Administration's (SSA) policies and procedures for assigning Social Security numbers (SSN) to immigrants.<sup>1</sup> We held discussions with SSA personnel responsible for enumeration policy and procedures, systems and operations. We also visited two Department of Homeland Security (DHS) ports of entry and four SSA field offices in New York and California. We selected DHS ports of entry and SSA field offices in the two regions with the most Enumeration at Entry (EAE) pending applications. We interviewed personnel at the ports of entry to obtain an understanding of their role in SSA's EAE process. We also observed DHS personnel interviewing and admitting immigrants.

During our site visits to SSA field offices, we interviewed staff to determine their knowledge of the EAE process. We obtained data from each office regarding the number of EAE applications pending in SSA's Modernized Enumeration System (MES) as "not complete." We selected 37 EAE pending records (with status of "not complete") to determine why MES was unable to process them.

We also obtained SSA's MES transaction history file for noncitizens who obtained an original SSN via the EAE process from July through December 2006. From our population of 44,084 EAE records, we randomly selected a sample of 250 records to determine whether SSA subsequently assigned a second SSN to those individuals.

In our 2005 review, we obtained the Department of State's (State) Form DS-230, *Application for Immigrant Visa and Alien Registration*, to determine whether immigrants provided additional names that were not included in the electronic transmission. Because State charges a fee for providing copies of DS-230s, we did not obtain them for our current sample. Instead, we obtained State's electronic DS-230 file. As a result, we may have been unable to detect multiple SSNs that would have been identified had we obtained the paper DS-230s.

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<sup>1</sup> We use the term "immigrant" to refer to those noncitizens who Department of Homeland Security admitted as permanent residents.

The SSA entities reviewed were the Offices of the Deputy Commissioners for Operations, Retirement and Disability Policy, and Systems. We relied primarily on MES to complete our review and determined the MES data used in the report were sufficiently reliable given the audit objective and use of the data. We conducted this performance audit from April through November 2007 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. The following table shows our sample size, results, and appraisal.

**Table 1: Sample Results and Projection on Multiple SSNs Identified**

<b>SAMPLE ATTRIBUTE APPRAISAL</b>	
Total Population of Original SSNs SSA Assigned to Immigrants via the EAE Process from July through December 2006	44,084
Sample Size	250
Number of Instances in Sample Where SSA Assigned Multiple SSNs to Immigrants	12
<b>Estimate of Instances in Population Where SSA Assigned Multiple SSNs to Immigrants</b>	<b>2,116</b>
Projection—Lower Limit	1,233
Projection—Upper Limit	3,374
<i>Projection made at the 90-percent confidence level.</i>	

We generated the following estimates based on the 12 (5 percent) multiple SSNs identified in our review of 250 sample cases.

**Estimate 1: Estimation of Multiple SSN Cases Where System Edits Did Not Identify Duplicate Applications on Same Date or Previously Assigned SSNs**

Of the 12 multiple SSN cases, we determined 8 occurred because system edits did not identify duplicate applications on the same date or previously assigned SSNs. Based on these results, we estimate about 1,411 (67 percent) of the projected 2,116 multiple SSNs were due to system edits not identifying duplicate applications on same date or previously assigned SSNs. We calculated our estimate as follows:

$$8 \div 12 = .6666 \times 2,116 = 1,410.66 \text{ (1,411).}$$



**Estimate 2: Estimation of Multiple SSN Cases Where Field Office Personnel Improperly Resolved Enumeration Feedback Messages**

Of the 12 multiple SSN cases, we determined 4 occurred because field office personnel improperly resolved enumeration feedback messages. Based on these results, we estimate about 705 (33 percent) of the projected 2,116 multiple SSNs were due to field office personnel improperly resolving Enumeration Feedback Messages. We calculated our estimate as follows:  $4 \div 12 = .33333 \times 2,116 = 705.33$  (705).

**Estimate 3: Estimation of Multiple SSN Cases Where Immigrants Visited a Field Office Within 1 Week of Entering the United States**

Of the 12 multiple SSN cases, we determined 7 belonged to immigrants who had visited an SSA field office within 1 week of entering the United States. Based on these results, we estimate about 1,234 (58 percent) of the projected 2,116 multiple SSNs belong to immigrants who visited a field office within 1 week of entering the United States. We calculated our estimate as follows:  $7 \div 12 = .58333 \times 2,116 = 1,234.33$  (1,234).

## Agency Comments



## SOCIAL SECURITY

### MEMORANDUM

**Date:** March 14, 2008 **Refer To:** S1J-3

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

**From:** David V. Foster  
Chief of Staff /s/

**Subject:** Office of the Inspector General (OIG) Draft Report, "Follow-up Assessment of the Enumeration at Entry Process" (A-08-07-17143)—INFORMATION

We appreciate OIG's efforts in conducting this review. Our response to the report findings and recommendations are attached.

Please let me know if we can be of further assistance. Staff inquiries may be directed to Ms. Candace Skurnik, Director, Audit Management and Liaison Staff, at extension 54636.

Attachment:  
SSA Response

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "FOLLOW-UP ASSESSMENT OF THE ENUMERATION AT ENTRY PROCESS" (A-08-07-17143)**

Thank you for the opportunity to review and comment on the draft report. We are pleased that the results of this review found that the multiple Social Security number (SSN) assignment error rate has decreased by more than half, from 11 percent in 2005 to 5 percent for this review. We also agree that addressing weaknesses in the Enumeration At Entry (EAE) process is important before expansion to other non-citizen groups. Given the documented progress made since the 2005 report, we plan to continue to concurrently make improvements while exploring expansion.

We believe the language used to explain estimates 1 through 3 in Appendix B, "Scope, Methodology and Sample Appraisal" (pages B2 – B3), needs to be revised to more clearly state that there were a total of 12 cases identified in the study which had multiple SSNs assigned. As currently written, the information in these sections is misleading as it appears that there were 12 of these cases identified for each estimate versus 12 total cases identified during the study.

Our responses to the specific recommendations are provided below:

**Recommendation 1**

Cross-reference multiple SSNs the Agency assigned to immigrants identified during the review.

Response

We agree. The cases identified in the report are being cross-referred.

**Recommendation 2**

As soon as practicable, implement systems changes to propagate alien registration numbers to the Numidents of all immigrants who apply for SSNs.

Response

We partially agree. We are currently redesigning the Modernized Enumeration System (MES) to the new Social Security Number Application Process (SSNAP). We will consider adding alien registration numbers to the Numident for a future release in SSNAP.

**Recommendation 3**

Once alien registration numbers are propagated, enhance system edits to include a search on these numbers.

### Response

We partially agree. Implementation of this recommendation is contingent upon the addition of alien registration numbers to the Numidents of all immigrants, as suggested in recommendation 2. Therefore, we will consider including an edit to search records by alien registration numbers in the new SSNAP if recommendation number 2 is implemented.

### **Recommendation 4**

Periodically conduct random reviews of enumeration feedback message (EM) resolutions and take appropriate measures to improve field offices' processing of EMs.

### Response

We agree. Currently, the New York MES Workload Management Information (WMI) is used to monitor pending enumeration workloads, which includes cases that have received EMs. The WMI provides an additional level of control over this workload and may be used to conduct random reviews of EMs.

### **Recommendation 5**

Periodically assess the EAE process to determine whether immigrants continue to apply for SSNs through EAE and field offices. If trends continue, use this assessment to determine further steps needed to educate immigrants about the EAE process.

### Response

We agree. We also believe a more detailed explanation should be provided to the applicant by the Department of Homeland Security (DHS) or the Department of State (State) which makes clear to the immigrant that he/she is applying for a Social Security number when he/she applies for a visa.

### **Recommendation 6**

Work with State and DHS to encourage those agencies to discontinue input of data incompatible with the Agency's systems.

### Response

We agree. Compatible input of data would help eliminate a large percentage of the cases that do not process through EAE. We will identify the specific incompatibility issues and relay those issues to State and DHS.

## **Recommendation 7**

Review and correct pending EAE applications or perform an analysis to determine the cost of correcting these applications versus the cost of requiring EAE applicants to visit a field office.

### **Response**

We agree. We currently have a process in place (as mentioned in our response to recommendation 4) for correcting pending EAE applications. In some cases, the resolution of EMs may require EAE applicants to visit field offices. To clear an EAE exception, our policy and procedures require the SSN applicant to be present to confirm all enumeration data that will be passed to the Numident. We will determine if the system can be modified in a future SSNAP release to enable FO employees to correct certain pending EAE applications without requiring the EAE applicant to visit the FO; for example, allowing updates to limited data elements to resolve extraneous characters.

## **OIG Contacts and Staff Acknowledgments**

Kimberly A. Byrd, Director, 205-801-1650

Theresa Roberts, Audit Manager, 205-801-1619

### ***Acknowledgments***

In addition to those named above:

Kenley Coward, Senior Program Analyst

For additional copies of this report, please visit our web site at [www.socialsecurity.gov/oig](http://www.socialsecurity.gov/oig) or contact the Office of the Inspector General's Public Affairs Specialist at (410) 965-3218. Refer to Common Identification Number A-08-07-17143.



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Chairman and Ranking Minority Member, Committee on Oversight and Government Reform

Chairman and Ranking Minority Member, Committee on Appropriations, House of Representatives

Chairman and Ranking Minority, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, House of Representatives

Chairman and Ranking Minority Member, Committee on Appropriations, U.S. Senate

Chairman and Ranking Minority Member, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, U.S. Senate

Chairman and Ranking Minority Member, Committee on Finance

Chairman and Ranking Minority Member, Subcommittee on Social Security Pensions and Family Policy

Chairman and Ranking Minority Member, Senate Special Committee on Aging

Social Security Advisory Board

# **Overview of the Office of the Inspector General**

The Office of the Inspector General (OIG) is comprised of our Office of Investigations (OI), Office of Audit (OA), Office of the Chief Counsel to the Inspector General (OCCIG), and Office of Resource Management (ORM). To ensure compliance with policies and procedures, internal controls, and professional standards, we also have a comprehensive Professional Responsibility and Quality Assurance program.

## **Office of Audit**

OA conducts and/or supervises 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 and program evaluations and projects on issues of concern to SSA, Congress, and the general public.

## **Office of Investigations**

OI conducts and coordinates investigative activity 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 OIG liaison to the Department of Justice on all matters relating to the investigations of SSA programs and personnel. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

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

OCCIG provides independent legal advice and counsel to the IG on various matters, including statutes, regulations, legislation, and policy directives. OCCIG 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. Finally, OCCIG administers the Civil Monetary Penalty program.

## **Office of Resource Management**

ORM supports OIG by providing information resource management and systems security. ORM also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, ORM is the focal point for OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act of 1993.