OFFICE OF
THE INSPECTOR GENERAL

SOCIAL SECURITY ADMINISTRATION

**EFFECTIVENESS OF SPECIAL
INDICATOR CODES ON THE SOCIAL
SECURITY ADMINISTRATION'S
NUMIDENT FILE**

August 2009   A-08-09-19099

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.
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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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MEMORANDUM

Date: August 26, 2009   Refer To:

To: The Commissioner

From: Inspector General

Subject: Effectiveness of Special Indicator Codes on the Social Security Administration's Numident File (A-08-09-19099)

OBJECTIVE

Our objective was to assess the effectiveness of Special Indicator codes on the Social Security Administration's (SSA) Numident file.

BACKGROUND

SSA adds Special Indicator codes to Numident records to alert employees to special situations, identify Social Security numbers (SSN) that individuals obtained fraudulently, prevent unauthorized disclosure of information, block the issuance of replacement SSN cards and SSN verification printouts,[1] and prevent verification of SSNs. SSA initially established five Special Indicator codes in 1992, adding one code in 1999 and another in 2004. SSA added two codes in 2007 in response to the *Intelligence Reform and Terrorism Prevention Act of 2004*,[2] which required that the Agency add death and fraud indicators to its SSN verification systems for employers, State agencies issuing driver's licenses and identity cards, and other verification routines that the Commissioner of Social Security determines to be appropriate. These codes identify situations where (1) the Office of the Inspector General (OIG) determined an individual fraudulently obtained an SSN or (2) the Agency assigned a new SSN because of misuse of the original number.[3] As of November 2008, about 46,000 of the 453 million SSNs on the Numident had Special Indicator codes. Table 1 describes the Special Indicator codes on the Numident.

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[1] The *Privacy Act of 1974, as amended, 5 U.S.C. 552a § 2(b)(3)*, gives individuals the right to information about themselves in SSA's systems of records. In January 2002, because of concerns about potential identity theft, SSA began issuing SSN Printouts, which contain only an individual's name and SSN.

[2] Pub. L. No. 108-458 § 7213(a)(2).

[3] SSA refers to codes 1 through 7 as Special Indicator codes and codes 8 and 9 as fraud codes. We use the term "Special Indicator code" throughout this report to refer to all nine codes. SSA uses all codes for internal purposes and codes 8 and 9 in its SSN verification systems.

Table 1: Special Indicator Codes on the Numident as of November 2008

Code	Description	Number
1	False Identity	5,598
2	Noncitizen Not in Status	9,291
3	Multiple SSNs with Different Identities	2,718
4	Scrambled Earnings with New SSN Assigned[4]	2,476
5	SSN Obtained Using Fraudulent Documentation	18,172
6	SSN Assigned Based on Harassment/Abuse/Life Endangerment	14,734
7	Fictitious Identity	1,159
8	Fraud–OIG Investigated	902
9	Fraud SSN Misuse	635
Total number of Special Indicator codes		**55,685**
Number of SSNs		**45,736**

Source: OIG analysis of Numident data.

During the replacement SSN card application process, automated systems[5] alert SSA field office personnel to the presence of Special Indicator codes on the Numident. SSA has similar alerts when issuing SSN printouts. In addition, SSA uses Special Indicator codes 8 and 9 in its SSN verification systems, which return a non-verified response to employers and other third parties. Appendix B shows historical trends of Special Indicator codes.

To accomplish our objective, we reviewed relevant SSA policies and procedures. We also interviewed personnel from SSA Headquarters in Baltimore, Maryland, and selected field offices nationwide. From the Numident, we identified a population of 45,736 SSNs that had a Special Indicator code as of November 2008. From SSA's Special Indicator Transaction File,[6] we identified 2,279 Special Indicator code additions and 510 code deletions in Fiscal Year (FY) 2008. We tested these populations to determine whether (1) controls were working as intended and (2) field office personnel were complying with policies and procedures. Appendix C includes a detailed description of our scope and methodology.

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[4] Wages or self-employment income belonging to one individual but posted to another person's earnings record.

[5] Field office personnel use SSA's Visitor Intake Process (VIP) to manage office interviews. Within VIP, the Customer Service Query provides information from various SSA databases, including the Numident. To process replacement SSN card applications, personnel use SS-5 Assistant, a Microsoft Access-based application that works in conjunction with the Modernized Enumeration System (MES).

[6] SSA's MES captures "add" and "delete" transaction data for all Special Indicator codes.

RESULTS OF REVIEW

Although SSA policies and procedures instructed field office personnel to add/delete certain Special Indicator codes, employees did not always properly do so. We believe this occurred primarily because field office personnel were not aware of policies and procedures or clear about which Special Indicator codes they should add/delete. We believe that failure to comply with policies and procedures may increase the Agency's risk of exposure to inappropriate issuance of replacement SSN cards or unauthorized disclosure of information. SSA has the opportunity to take additional steps to enhance the effectiveness of Special Indicator codes and reduce its risk of improper SSN issuance and unauthorized disclosure of information.

FIELD OFFICE PERSONNEL DID NOT ALWAYS ADD SPECIAL INDICATOR CODES APPROPRIATELY

SSA policies and procedures instruct field office personnel to add Special Indicator codes to the Numident when they identify situations meeting certain criteria. However, we found that field office personnel did not always add such codes to the Numident when required. For example, 15 (75 percent) of the 20 field offices we contacted informed us they generally did not add Special Indicator codes 2, 3, and 4 although field office personnel are the primary source for identifying and adding these codes. While we recognize that field offices can add Special Indicator codes 1, 5, and 7 to the Numident, field office personnel informed us they generally refer such cases to the OIG for review. In addition, field office personnel are not authorized to add code 6, and SSA adds codes 8 and 9 through automated processes.

As shown in Table 2, less than 4 percent of field offices nationwide added Special Indicator codes 2, 3, or 4 in FY 2008. That is, about 96 percent of all field offices nationwide did not add any of these codes to the Numident. These numbers appear to corroborate information received from field office personnel.

Table 2: Special Indicator Codes 2, 3, and 4 Added in FY 2008

Special Indicator Code	Description	Number of Codes Added	Number of Field Offices Adding Codes	Percentage of Field Offices Nationwide[7]
2	Noncitizen Not in Status	135	46	3.6
3	Multiple SSNs with Different Identities	127	34	2.6
4	Scrambled Earnings with New SSN Assigned	67	48	3.7

Source: OIG analysis of Special Indicator code transaction data SSA provided.

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[7] According to SSA's Division of Resource Management Information's Management Information Reports Intranet website, SSA had 1,296 field offices as of September 28, 2007.

We believe the following examples illustrate field office personnel's lack of awareness of policies and procedures.

- Personnel at 1 field office informed us they receive over 700 replacement SSN card applications each year from noncitizens who provide expired immigration documents[8] and about 4 applications from individuals who have multiple SSNs under different identities or name spellings. Field office personnel informed us they did not add Special Indicator codes 2 or 3 to the Numident because they were not aware of SSA policies and procedures instructing them to do so.

- Personnel at a Social Security Card Center informed us they receive between 250 and 500 replacement SSN card applications each year from noncitizens who do not have a current immigration status. This office also processes between 150 and 200 replacement SSN card applications each year from individuals assigned new SSNs to resolve scrambled earnings. However, in FY 2008, this office only added one Special Indicator code 2 and one code 4. Management acknowledged that staff may not always be aware of situations in which the Agency should add Special Indicator codes.

In addition, although SSA policies and procedures only authorize the Office of Central Operations (OCO) to add Special Indicator code 6, we found that field office personnel added this code to three Numident records in FY 2008. Moreover, field offices completed processing of these SSN applications instead of forwarding the evidence to OCO for final determination, as required by SSA policies and procedures. Furthermore, some field offices added Special Indicator codes to the Numident that were not always complete or accurate. For example, 972 (36 percent) of the 2,718 SSNs on the Numident with Special Indicator code 3 were not cross-referenced to other SSNs of the same individual.[9] We believe SSA should either cross-reference these cases or delete the Special Indicator code from the Numident. We plan to send these cases to SSA for further review.

We believe field office personnel did not properly add Special Indicator codes because they were not aware of policies and procedures or clear about which codes they should add/delete. Some field office personnel informed us they were confused about which codes should be added in certain situations, and others acknowledged they had never heard of Special Indicator codes. Field office employees stated they had received minimal instruction in this area and would benefit from refresher training.

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[8] Program Operations Manual System, RM 00203.400, indicates that all applicants for a replacement SSN card who allege a foreign place of birth and/or who are not U.S. citizens must submit evidence of lawful alien status or Department of Homeland Security-granted work authorization. In addition, SSA personnel verify noncitizen evidentiary documents with the Department of Homeland Security and/or the Department of State before replacement SSN card issuance.

[9] When SSA issues an individual more than one SSN, it must link (cross-reference) the SSNs so earnings can be properly credited to his/her earnings record.

Our analysis of Special Indicator codes appears to corroborate information received from field office personnel. For example, we identified seven instances where field office personnel added five Special Indicator codes to a Numident record on the same day. In addition, we identified 120 instances where personnel added 4 codes to a Numident record. While we recognize there are legitimate reasons why Numident records have multiple Special Indicator codes, we believe these examples illustrate that some field office personnel may be unclear about the proper code to add. In addition, during a March 2007 meeting of SSA's Architecture Review Board,[10] officials stated that field office personnel often do not recognize the nuances among Special Indicator codes and sometimes use them interchangeably.

Based on our discussions with field office personnel and analysis of Special Indicator codes, we believe SSA should assess its policies and procedures regarding such codes. In some areas, SSA may need to clarify its policies and procedures and appropriately train field office personnel to ensure they clearly understand the proper Special Indicator codes they should add.

FIELD OFFICE PERSONNEL DID NOT ALWAYS DELETE SPECIAL INDICATOR CODES APPROPRIATELY

SSA policies and procedures allow for field office personnel to delete certain Special Indicator codes from the Numident when, for example, they determine such codes are in error or applicants prove they are eligible to receive a replacement SSN card. However, we found that field office personnel did not always delete Special Indicator codes from the Numident when policy permitted removal. For example, we identified 575 cases where SSA issued a replacement SSN card after Special Indicator code 2 had been added to the Numident. We reviewed 50 of these cases and determined that SSA properly issued the replacement SSN cards. As such, SSA should have deleted Special Indicator code 2 from the Numident. We plan to refer the remaining SSNs to SSA for possible corrective action. We also identified 23 cases where SSA did not delete Special Indicator code 5 from the Numident although applicants had provided documentation they were eligible to receive a replacement SSN card.[11] Other than Special Indicator codes 2 and 5, we did not identify any instances where SSA failed to delete codes when permitted to do so.

In addition, field office personnel did not always obtain OIG approval before deleting Special Indicator code 7, as required by SSA policies and procedures. Of the 13 Special Indicator code 7 records SSA deleted in FY 2008, field office personnel did not obtain OIG approval in 7 (54 percent) cases.

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[10] SSA's Enterprise Architecture establishes the framework to ensure that information technology investments align with SSA's strategic business plans. SSA established the Architecture Review Board to oversee, manage, and enforce compliance with the enterprise architecture.

[11] If personnel do not delete Special Indicator code 2 or 5, the field office receives an enumeration feedback message (generated when application data conflicts with SSA records) the following day, which management must resolve before completing the SSN replacement card application.

We believe field office personnel did not always properly delete Special Indicator codes because they were not aware of applicable policies and procedures. Field office employees informed us they had received minimal instruction in this area and would benefit from refresher training.

OPPORTUNITIES TO HELP ENSURE FIELD OFFICE COMPLIANCE WITH POLICIES AND PROCEDURES

When field office personnel do not fully comply with policies and procedures for adding and deleting Special Indicator codes, the Agency increases its risk of inappropriate issuance of replacement SSN cards or unauthorized disclosure of information, such as improperly issuing SSN printouts.[12] While the SS-5 Assistant and the MES alert field office personnel to Special Indicator codes, these automated systems do not prompt staff to add codes when appropriate. For example, when field office personnel confirm a noncitizen applying for a replacement SSN card does not have a current immigration status, automated systems do not prompt personnel to add Special Indicator code 2 to the Numident. In addition, automated systems do not require that field office staff delete Special Indicator codes before SSA issues replacement SSN cards.

To help ensure field office compliance with policies and procedures, we believe SSA should implement systems enhancements and consider controls in SS-5 Assistant and MES and/or its Social Security Number Application Process (SSNAP)[13] that would guide field office personnel during the replacement SSN card process. That is, when field office personnel encounter a situation where they should add a Special Indicator code, systems prompts would alert them to do so. Field office personnel agreed that such prompts would assist them in complying with policies and procedures. In addition, when field office personnel determine that individuals are eligible to receive replacement SSN cards, systems controls would prevent personnel from completing the application until they delete the appropriate Special Indicator code from the Numident.

SSA has an additional opportunity to enhance the effectiveness of Special Indicator codes by adding alerts to its Customer Service Query.[14] While a Customer Service Query alerts field office personnel to the presence of Special Indicator codes 1 through 6 on the Numident, it does not provide alerts for codes 7 through 9. As such, field office personnel may not take additional steps to ensure applicants are who they claim to be or recognize issues that could impact program eligibility. Therefore, we believe the Customer Service Query should include alerts for all Special Indicator codes.

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[12] Because SSN printouts contain individuals' names and SSNs, unauthorized release of such information can result in SSN misuse and/or identity theft.

[13] SSNAP will ultimately replace the SS-5 Assistant and the MES as the front-end software supporting SSN processing. SSA is scheduled to begin phasing in SSNAP Release 1.0 on August 31, 2009.

[14] Field office personnel routinely use this Query during face-to-face interviews to help them verify applicant identities and identify issues that could impact program eligibility.

CONCLUSION AND RECOMMENDATIONS

Despite SSA's use of Special Indicator codes to prevent improper SSN issuance and unauthorized disclosure of information, the Agency remains at risk to such activity when field office personnel do not fully comply with policies and procedures. It is important that field office personnel properly add/delete Special Indicator codes to help alert other employees/field offices to special or potentially fraudulent situations and ensure that SSA's records are complete and accurate. We believe SSA would benefit by taking additional steps to ensure field office compliance with Special Indicator code policies and procedures and thereby strengthen SSN integrity.

Accordingly, we recommend that SSA:

1. Assess its policies and procedures regarding Special Indicator codes and clarify as necessary.

2. Provide refresher training to field office personnel on policies and procedures regarding Special Indicator codes.

3. Implement system enhancements that would alert field office personnel to add/delete Special Indicator codes, including situations in which policies and procedures require OIG approval.

4. Consider implementing systems controls to prevent field office personnel from issuing replacement SSN cards before the appropriate Special Indicator code is deleted from the Numident.

5. Review all situations where field offices issued replacement SSN cards for SSNs with Special Indicator codes 2 or 5 on the Numident and determine whether the Agency should delete these codes.

6. Correct Numident records having Special Indicator code 3 with no cross-referred SSN(s).

7. Add alerts for Special Indicator codes 7, 8, and 9 to its Customer Service Query.

AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix D.

Patrick P. O'Carroll, Jr.

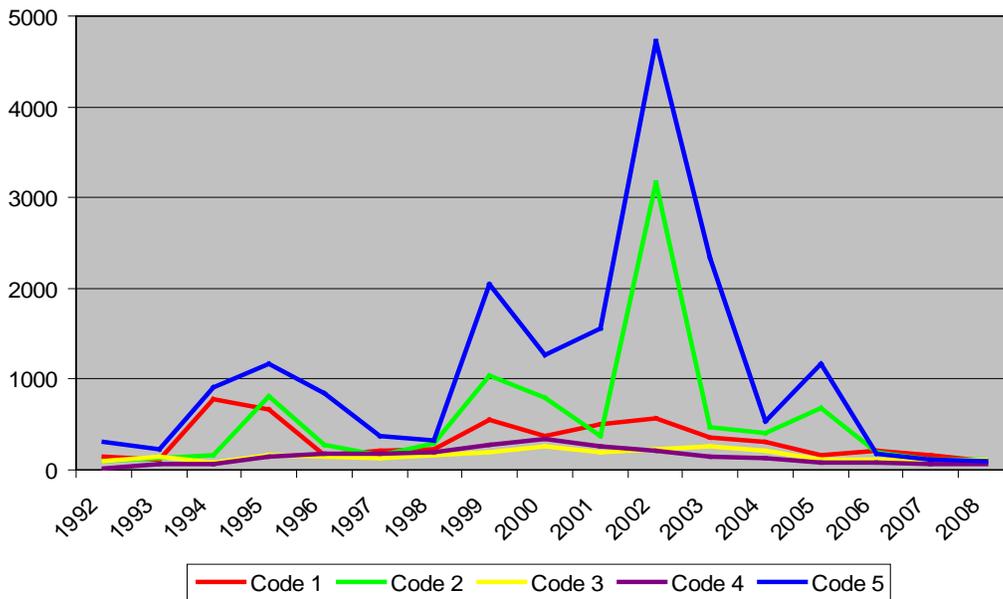# *Appendices*

Acronyms

FY	Fiscal Year
MES	Modernized Enumeration System
OCO	Office of Central Operations
OIG	Office of the Inspector General
SSA	Social Security Administration
SSN	Social Security Number
SSNAP	Social Security Number Application Process
VIP	Visitor Intake Process

Historical Trends

Figures 1 and 2 below show the historical trends of Special Indicator codes on the Numident through November 2008.[1] The Social Security Administration (SSA) established Special Indicator codes 1 through 5 in 1992. It added code 6 in 1999, code 7 in 2004, and codes 8 and 9 in 2007.
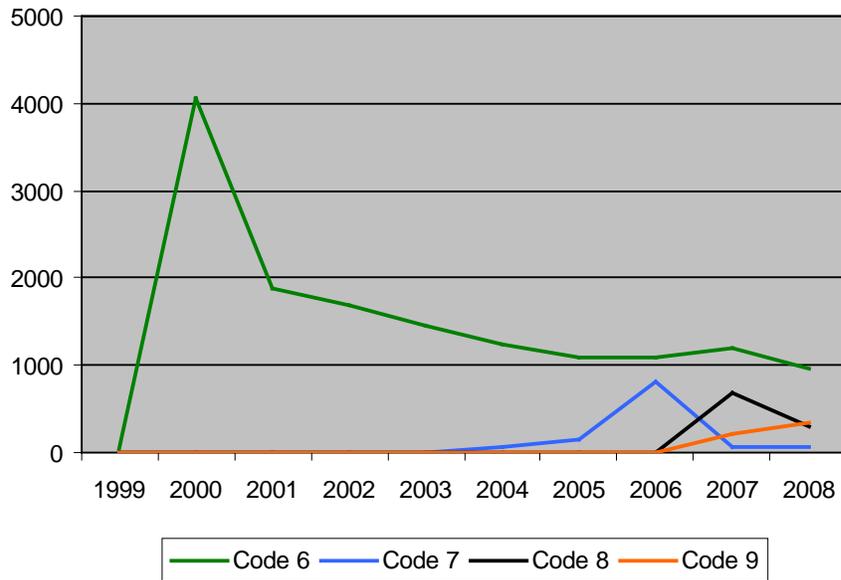
Figure 1: Historical Trends of Special Indicator Codes 1 - 5

Note: In Calendar Year 2002, Social Security numbers (SSN) with Special Indicator code 2 on the Numident increased 743 percent from the prior year (from 376 to 3,171) while SSNs with Special Indicator code 5 increased over 200 percent (from 1,557 to 4,730). Personnel with SSA's Office of Income Security Programs attributed these increases to heightened awareness by field office staff to fraudulent documents in the wake of the events of September 11, 2001.

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[1] The source for Figures 1 and 2 was Office of the Inspector General analysis of SSA's Numident data as of November 2008. Special Indicators added and then deleted are not included in the figures.

Figure 2: Historical Trends of Special Indicator Codes 6 - 9

Note: The high volume of Special Indicator code 6 records added in 2000 by SSA's Office of Central Operations (OCO) can be attributed to the fact that OCO initially added this code to existing SSNs assigned for reasons of harassment, abuse, or life endangerment. The high volume of Special Indicator code 7 records in 2006 (increase of 468 percent from 2005) can be attributed to several large fraud cases investigated by the Office of the Inspector General.

Scope and Methodology

To achieve our objective, we reviewed pertinent sections of the Social Security Administration's (SSA) policies and procedures and interviewed representatives from SSA's Offices of

- Income Security Programs under the Deputy Commissioner for Retirement and Disability Policy;

- Public Service and Operations Support and Central Operations under the Deputy Commissioner for Operations; and

- Retirement and Survivors Insurance Systems under the Deputy Commissioner for Systems.

To determine the level of employee awareness and use of Special Indicator codes, we contacted 20 field offices (we visited 3 field offices and contacted 17 others by telephone). We selected field offices based on the volume and type of Special Indicator code activity and geographic diversity, including at least one field office in each SSA region.

To test the effectiveness of controls over issuing replacement Social Security number (SSN) cards and printouts, the accuracy of codes, and the generation of systems alerts, we obtained a data extract from SSA's Numident of 45,736 SSNs having 1 or more Special Indicator codes as of November 2008. From this population we:

- Matched all records to the Numident and identified replacement SSN cards issued following the addition of Special Indicator codes 2 (575 cards) and 5 (23 cards). We then reviewed selected actions to determine whether SSA had obtained the appropriate evidence before issuing replacement SSN cards.

- Matched all records to SSA's Audit Trail System to identify SSN printouts following the addition of a Special Indicator. We then reviewed selected records to determine whether SSA properly issued printouts.

- Performed on-line testing of selected Numident records for each Special Indicator code to determine whether we could generate an SSN printout.

- Determined whether 2,718 SSNs with Special Indicator code 3 on the Numident had cross-referenced SSNs.

- Performed on-line testing of SSA's Customer Service Query and SS-5 Assistant to determine whether systems properly generated alerts for each Special Indicator.

To test the effectiveness of controls related to adding and deleting Special Indicator codes to the Numident, we obtained a data extract from SSA's Special Indicator Transaction File of 2,279 code additions and 510 code deletions during Fiscal Year 2008. From this population, we:

- Reviewed all 13 Special Indicator code 7 deletions from the Numident to determine whether SSA had obtained Office of the Inspector General (OIG) approval. We did not review Special Indicator code 8 deletions because SSA policy requiring OIG approval for deletion was not implemented until November 2008.

- Processed 25 SSNs with Special Indicator code 8 on the Numident and 25 SSNs with Special Indicator code 9 through SSA's Enumeration Verification System to determine whether the System generated the proper response (that is, SSN did not verify—other reason).

- Determined whether 232 SSNs with Special Indicator code 8 on the Numident agreed with fraud cases in OIG's National Investigative Case Management System.

- Determined whether 403 SSNs with Special Indicator code 9 on the Numident agreed with the number of SSN applications in SSA's Modernized Enumeration System where field office personnel documented SSN misuse and disadvantage.

The SSA entity reviewed was the Office of the Deputy Commissioner for Operations. We performed our audit at the Office of Audit in Birmingham, Alabama. Our review of internal controls was limited to SSA's policies and procedures for processing SSN applications when Special Indicator codes are present on the Numident and for adding and deleting Special Indicator codes. We primarily relied on SSA's Numident and Special Indicator Transaction Files to complete our review and determined that the data used in the report were sufficiently reliable given the audit objective and use of the data. We conducted our work from January through May 2009 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 objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Agency Comments

SOCIAL SECURITY

MEMORANDUM

Thank you for the opportunity to review and comment on the draft report. We appreciate OIG's efforts in conducting this review. Attached is our response to the report findings and recommendations.

Please let me know if we can be of further assistance. Please direct staff inquiries 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, "EFFECTIVENESS OF SPECIAL INDICATOR CODES ON THE SSA'S NUMIDENT FILE" (A-08-09-19099)

We are pleased that the report did not identify evidence of erroneous assignment of Social Security numbers (SSN), improper issuance of new or replacement cards, or improper SSN disclosure as a result of the inconsistent treatment of special indicator codes (SPIN) on the Numident. We agree with the report's findings and recommendations. We will consider policy and automated solutions where possible in future releases of our redesigned enumeration system, referred to as the Social Security Number Application Process (SSNAP).

Please find below our responses to the recommendations.

Recommendation 1

Assess its policies and procedures regarding special indicator codes and clarify as necessary.

Comment

We agree. We are currently updating policies and procedures, including special indicator codes, in the Program Operations Manual System in conjunction with the release of SSNAP scheduled for fall 2009.

Recommendation 2

Provide refresher training to field office (FO) personnel on policies and procedures regarding special indicator codes.

Comment

We agree. We will include this topic in the training that we are planning this fall when we implement SSNAP.

Recommendation 3

Implement system enhancements that would alert FO personnel to add/delete special indicator codes, including situations in which policies and procedures require OIG approval.

Comment

We agree. There are currently several systems messages that alert personnel to the presence of special indicator codes 1, 2, 4, 5, 7, 8, and 9 on the Numident record, along with detailed procedures on how to resolve these alerts. The refresher training planned for the implementation of SSNAP will include information on adding or resolving these specific cases. In addition, we are proposing a SSNAP Release 2 enhancement that will require OIG approval before allowing the deletion of special indicator codes 7 and 8.

Recommendation 4

Consider implementing systems controls to prevent FO personnel from issuing replacement SSN cards before the appropriate special indicator code is deleted from the Numident.

Comment

We agree. There are current systems controls in place to prevent the initial release of replacement cards where specific SPIN codes are present. However, as we move forward with SSNAP Release 2, we will explore additional systems controls that may facilitate a more effective use of SPIN codes to prevent FO personnel from issuing SSN cards before deleting necessary SPIN codes from the Numident.

Recommendation 5

Review all situations where field offices issued replacement SSN cards for SSNs with special indicator 2 or 5 on the Numident, and determine whether the agency should delete these codes.

Comment

We agree. Presently, these cases are under review.

Recommendation 6

Correct Numident records having Special Indicator code 3 with no cross-referred SSN(s).

Comment

We agree. We will take the necessary action when we receive the cases from OIG.

Recommendation 7

Add alerts for special indicator codes 7, 8, and 9 to its Customer Service Query.

Comment

We agree. We will add codes 7, 8, and 9 to the Customer Service Query as resources become available.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Kimberly A. Byrd, Director

Jeff Pounds, Audit Manager

Acknowledgments

In addition to those named above:

Charles Lober, Senior Auditor

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