
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**THE SOCIAL SECURITY NUMBER
APPLICATION PROCESS**

April 2011

A-08-11-1121

AUDIT REPORT



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- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.**
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SOCIAL SECURITY

MEMORANDUM

Date: April 15, 2011

Refer To:

To: The Commissioner

From: Inspector General

Subject: The Social Security Number Application Process (A-08-11-11121)

OBJECTIVE

Our objective was to determine the effectiveness of the Social Security Number Application Process (SSNAP) in enhancing compliance with Social Security Administration (SSA) policies and procedures for assigning Social Security numbers (SSN).

BACKGROUND

SSNAP is the Agency's Web-based Intranet application for taking original and replacement SSN card applications at field offices. SSA began phasing in SSNAP in August 2009 and fully implemented this process in February 2010. SSNAP combines the functionality of two prior systems: the SS-5 Assistant and the Modernized Enumeration System. SSA developed SSNAP to help reinforce Agency enumeration policies and standardize data collection.

SSA generally requires that applicants for original SSNs provide acceptable documentary evidence of (1) age, (2) identity, and (3) citizenship or lawful noncitizen status.¹ At the beginning of each in-person interview, field office personnel inform applicants that they will use the answers to questions asked to process their application. Personnel then enter information into SSNAP, which provides drop-down menus and policy reminders to facilitate the process. Field office personnel verify documents through a variety of methods, including visual inspection and verification with other organizations. To verify noncitizens' immigration status, SSNAP forwards information electronically to the Department of Homeland Security's (DHS) Systematic Alien Verification for Entitlements Program. At the end of the interview, field office personnel ask applicants to review a printed copy of the application and attest to the truthfulness of their answers. After determining the validity of supporting evidentiary documents, personnel clear the application and destroy the printout and any copies of documents. Once certified and cleared, SSNAP's batch system performs numerous automated edits

¹ SSA, POMS, RM 10210.020 (March 22, 2010).

to validate certain applicant information. If the application passes these edits, SSA systems assign an SSN, issue an SSN card, and establish a record in SSA's information systems.

To accomplish our objective, we reviewed SSA's policies and procedures for processing original SSNs. To evaluate field office compliance with these policies and procedures, we identified a population of 344,422 original SSNs assigned by SSA from April through June 2010. We then reviewed a random sample of 50 SSNs. We also contacted eight field offices and two Social Security Card Centers in nine SSA regions and the International Benefits Office at SSA Headquarters. We limited our review to an assessment of SSNAP as it related to the Agency's documentation requirements for original SSNs. Appendix B includes a detailed description of our scope and methodology.

RESULTS OF REVIEW

SSNAP was generally effective in enhancing field office compliance with policies and procedures for assigning original SSNs. Field office personnel with whom we spoke told us that SSNAP was user-friendly and helped them obtain acceptable evidentiary documents when processing original SSN applications. While we acknowledge that our limited review did not disclose any significant problems with SSNAP, we identified several areas where we believe SSA could further enhance SSNAP to improve the integrity of the SSN assignment process.

We noted that SSNAP did not always ensure compliance with SSA enumeration policies and procedures. For example, in certain instances, we determined that SSNAP allowed field office personnel to process original SSN applications with conflicting documentation. Additionally, we determined that SSNAP allowed field office personnel to process original SSN applications without meeting all secondary identity evidence requirements. We also determined that field office personnel did not always document that no other evidence was available when processing original SSN applications for refugees with only an immigration document, as required by SSA policy.² We acknowledge this is a documentation issue and the effect of noncompliance is difficult to measure. However, if SSA believes this policy is critical in ensuring proper SSN assignment, it should establish systems controls to ensure compliance. If not, SSA should reassess its policy accordingly.

² SSA, POMS, RM 10210.020 D (March 22, 2010).

Field Office Personnel Can Process Original SSN Applications with Certain Types of Conflicting Documentation

SSA policy requires that field office personnel compare the information on documents submitted by applicants for original SSNs and reconcile any discrepancies.³ However, we determined that field office personnel could process original SSN applications with certain conflicting documentation. Specifically, we identified one instance in which a field office processed an original SSN application for a noncitizen (H-2B worker),⁴ and staff documented they used a U.S. passport as proof of age. Because a U.S. passport conflicted with the applicant's immigration status, we requested the Department of State determine its validity. The Department of State found that it was not a valid U.S. passport and told us it appeared consistent with passports issued by the applicant's country of birth. As such, we believe the field office incorrectly coded a foreign passport as a U.S. passport.

Additionally, our systems tests confirmed that SSNAP allowed field office personnel to enter a U.S. passport as evidence of age when the applicant was a noncitizen (for example, a J-1 exchange visitor or F-1 foreign student).⁵ We also determined that SSNAP did not generate a message to alert field office personnel when they entered an applicant's age and/or identity information that conflicted with their immigration status.

We believe SSA would benefit from enhancing SSNAP to identify instances in which field office personnel enter an applicant's age and/or identity information that conflicts with their immigration status. For example, SSA could add an alert in SSNAP that would inform field office personnel when this occurs. That is, SSNAP could identify instances in which field office personnel either document conflicting information or incorrectly code an application. In either situation, SSNAP could alert field office personnel to the discrepancy and ask if they wish to continue processing the application. Some field office and Headquarters personnel with whom we spoke generally agreed that adding such an alert would help prevent improper SSN assignment and reduce coding errors.

³ SSA, POMS, RM 10210.020 (March 22, 2010) and RM 10210.210 (December 30, 2010).

⁴ DHS assigns the nonimmigrant classification of "H-2B" to noncitizens approved for temporary non-agricultural work.

⁵ DHS assigns the nonimmigrant classification of "F-1" to approved noncitizen students enrolled at accredited schools and "J-1" to exchange visitors who participate in an approved program, such as teaching or serving as a camp counselor.

Field Office Personnel Can Process SSN Applications Without Meeting Secondary Identity Evidence Requirements

In response to the *Intelligence Reform and Terrorism Prevention Act of 2004*⁶ and its own efforts to ensure SSN integrity, SSA revised its policies and procedures for assigning original SSNs. In particular, SSA increased the identity requirements for obtaining an original SSN. In most cases, applicants must present certain valid identification documents of high probative value⁷ to prove their identity. Although SSNAP contains extensive controls to guide SSA employees through the complex enumeration process, we identified one area where SSA could strengthen controls. Specifically, we determined that SSNAP allowed field office employees to process original SSN applications without meeting all secondary identity evidence requirements.

SSA policy requires that field office personnel obtain identity documents with the highest probative value (for example, a driver's license or U.S. passport). If a primary document is not available,⁸ field office personnel must request secondary evidence (for example, health insurance or employee identification badge). Additionally, SSA policy requires that secondary identity documents meet specific criteria, including combinations of an issue or expiration date or photograph.⁹ Secondary identity documents with no issue or expiration date or photograph are not acceptable. However, we determined that field office personnel can process original SSN applications without meeting these requirements. For example, some field office personnel with whom we spoke told us they can use a health insurance or employee identification badge as proof of identity even if the document does not have an issue or expiration date or photograph.

To ensure proper SSN assignment, we believe it is important that SSA take appropriate measures to ensure individuals are who they claim to be. As such, we believe SSA should continue SSNAP enhancements that would help enforce secondary evidence of identity requirements. For example, SSA could add drop-down menus in SSNAP to help field office personnel determine whether secondary identity documents meet evidence requirements. That is, when field office personnel select a secondary U.S. identity document, such as a health insurance card with only an issue date, a drop-down menu would appear for staff to check whether it is unexpired and less than 2 years old for an adult (or less than 4 years old for a child). If field office personnel do not check this box, SSNAP should prevent them from processing the application. Some field office personnel we contacted generally agreed that adding drop-down menus would assist them in complying with policies and procedures. A representative from the

⁶ Pub. L. No. 108-458, Title VII, Section 7213, Social Security Cards and Numbers, codified at 42 U.S.C. § 405 note.

⁷ The probative value of a document relates to the proof of evidence it provides.

⁸ Available means the document exists and can be accessed or obtained within 10 business days.

⁹ SSA, POMS, RM 10210.405 (November 8, 2010) and RM 10210.420 (November 22, 2010).

Office of Enumeration and Medicare Policy told us the Office of Systems is considering SSNAP enhancements that would help enforce secondary evidence of identity requirements.

Field Office Personnel Did Not Routinely Document That No Other Evidence Was Available When Processing Original SSN Applications for Refugees

SSA policy requires that field office personnel annotate the “Remarks” field on the SSNAP summary screen with “NO OTHER EVIDENCE AVAILABLE” when a refugee, parolee, asylee, or victim of a severe form of trafficking has only an immigration document as evidence of age, identity, and lawful noncitizen status.¹⁰ However, in all three refugee cases we reviewed involving one document, field office personnel did not comply with this procedure.¹¹ We acknowledge this is a documentation issue, and it is difficult to measure the effect of noncompliance. Additionally, our systems tests showed that SSNAP neither generated an alert to prompt field office personnel to enter that no other evidence was available in the “Remarks” field nor prevented personnel from processing such SSN applications when employees failed to do so. Most field office personnel we contacted were not aware of the policy requirement and generally agreed that adding such an alert would assist them in complying with policies and procedures. If SSA believes this policy is critical in ensuring proper SSN assignment, we believe it should establish a systems control to ensure compliance. If not, SSA should reassess its policy accordingly.

We encourage SSA to identify other areas where policies and procedures require field office personnel to annotate the “Remarks” field and add similar alerts (if SSA believes such policies are critical to proper SSN assignment) to ensure compliance. For example, SSA policy requires that field office personnel annotate the “Remarks” field on the SSNAP summary screen when they verify a birth certificate via the Electronic Verification of Vital Events system.¹²

¹⁰ Ibid, Footnote 2.

¹¹ We did not review any cases involving parolees, asylees, or victims of a severe form of trafficking.

¹² SSA, POMS, GN 00302.980 D.4 (October 5, 2010). The Electronic Verification of Vital Events system is an automated data exchange between a State vital records agency and SSA for providing authorized personnel access to request and receive verifications of birth from the State where the event occurred.

CONCLUSION AND RECOMMENDATIONS

We commend SSA for developing SSNAP to help reinforce Agency policies and standardize data collection. However, as SSA continues to enhance SSNAP, we believe SSA would benefit by taking additional steps to strengthen SSN integrity and reduce its risk of exposure to improper SSN assignment. Accordingly, we recommend that SSA:

1. Enhance SSNAP to identify instances in which field office personnel enter an applicant's age and/or identity information that conflicts with their immigration status. For example, SSA could add an alert in SSNAP that would inform field office personnel when this occurs.
2. Continue SSNAP enhancements that would help enforce secondary evidence of identity requirements. For example, SSA could add drop-down menus in SSNAP to help field office personnel determine whether secondary identity documents meet SSA evidence requirements.
3. Determine whether requiring annotation in SSNAP's "Remarks" field with "NO OTHER EVIDENCE AVAILABLE" when a refugee, parolee, or victim of a severe form of trafficking has only an immigration document as evidence of age, identity, and lawful noncitizen status is essential to the enumeration process. If so, SSA should establish a systems control to ensure compliance. If not, SSA should reassess its policy accordingly.

AGENCY COMMENTS

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



Patrick P. O'Carroll, Jr.

Appendices

APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Agency Comments

APPENDIX D – OIG Contacts and Staff Acknowledgments

Acronyms

DHS	Department of Homeland Security
OIG	Office of the Inspector General
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
SSN	Social Security Number
SSNAP	Social Security Number Application Process
U.S.C.	United States Code

Scope and Methodology

To achieve our audit objectives, we:

- Interviewed representatives from the Social Security Administration's (SSA) Offices of Earnings, Enumeration & Administrative Systems, and Income Security Programs.
- Reviewed applicable laws, regulations, and SSA policies and procedures.
- Contacted eight field offices and two Social Security Card Centers in nine SSA regions and the International Benefits Office at SSA Headquarters. We selected offices based on geographic diversity and the volume of original Social Security number (SSN) applications processed.
- Obtained a data extract from SSA's enumeration history files for the period April through June 2010. From this extract, we identified a population of 344,422 completed original SSNs. From this population, we randomly selected a sample of 50 SSNs.

In conjunction with our audit, the Office of the Inspector General's Technical Services Division reviewed SSA testing/validation-related documentation and conducted tests of the Social Security Number Application Process (SSNAP) controls in SSA's Validation Region.

The SSA entities reviewed were the Offices of Systems and Retirement and Disability Policy. We conducted our work at the Office of Audit in Birmingham, Alabama. We primarily relied on SSA's SSNAP Transaction History files to complete our review and determined the data used in the report were sufficiently reliable given the audit objective and use of the data. We conducted our work from August through December 2010 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

Date: March 30, 2011

Refer To: S1J-3

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

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

Subject: Office of the Inspector General (OIG) Draft Report, "The Social Security Number Application Process" (A-08-11-11121)--INFORMATION

Thank you for the opportunity to review the subject report. Please see our attached comments.

Please let me know if we can be of further assistance. Please direct staff inquiries to Frances Cord, at extension 65787.

Attachment:
SSA Response

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, “THE SOCIAL SECURITY NUMBER APPLICATION PROCESS” A-08-11-11121

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

Recommendation 1

Enhance SSNAP to identify instances in which field office personnel enter an applicant’s age and/or identity information that conflicts with their immigration status. For example, SSA could add an alert in SSNAP that would inform field office personnel when this occurs.

Recommendation 2

Continue SSNAP enhancements that would help enforce secondary evidence of identity requirements. For example, SSA could add drop-down menus in SSNAP to help field office personnel determine whether secondary identity documents meet SSA evidence requirements.

Response to Recommendations 1 and 2

We agree. We will consider your recommendations as we continue to evaluate and refine SSNAP. However, we must weigh your recommendations against other planned improvements to decide which improvements to pursue based on its added value and the availability of systems resources.

Recommendation #3

Determine whether requiring annotation in SSNAP’s “Remarks” field with “NO OTHER EVIDENCE AVAILABLE” when a refugee, parolee, or victim of a severe form of trafficking has only an immigration document as evidence of age, identity, and lawful noncitizen status is essential to the enumeration process. If so, SSA should establish a systems control to ensure compliance. If not, SSA should reassess its policy accordingly.

Response

We continue to follow the policies found in Program Operations Manual System, Records Maintenance 10210.020, requiring at least one form of evidence from these individuals, and we will reassess whether it is necessary to continue annotating SSNAP’s “Remarks” field, “NO OTHER EVIDENCE AVAILABLE.”

OIG Contacts and Staff Acknowledgments

OIG Contacts

Kimberly A. Byrd, Director, Atlanta Audit Division

Jeff Pounds, Audit Manager, Birmingham Office of Audit

Acknowledgments

In addition to those named above:

Charles Lober, Senior Auditor

Kathy Yawn, Senior Auditor

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