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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**ACCURACY OF THE  
SOCIAL SECURITY ADMINISTRATION'S  
NUMIDENT**

**October 2012**

**A-08-12-11280**

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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.**

## **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.**



# SOCIAL SECURITY

## MEMORANDUM

Date: October 3, 2012

Refer To:

To: The Commissioner

From: Inspector General

Subject: Accuracy of the Social Security Administration's Numident (A-08-12-11280)

## OBJECTIVE

Our objective was to assess the accuracy of the Social Security Administration's (SSA) Numident fields that are relied on by E-Verify.

## BACKGROUND

Since 1936, SSA has assigned over 471<sup>1</sup> million Social Security numbers (SSN) for the primary purpose of accurately reporting and recording the earnings of people who work in jobs covered by Social Security.<sup>2</sup> When SSA assigns an SSN to an individual, it creates a master record of relevant information about the numberholder in its Numident. The Numident includes such information as the numberholder's name, date of birth, place of birth, parents' names, citizenship status, and date of death (if applicable). It also contains the office where the SSN application was processed.<sup>3</sup>

It is essential that the Numident be as accurate and complete as possible because SSA provides a number of verification services<sup>4</sup> that allow matching of names and SSNs with SSA's records. E-Verify (formerly Basic Pilot) is a Department of Homeland Security

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<sup>1</sup> The number was obtained from SSA's June 10, 2012 statistics.

<sup>2</sup> *Social Security Act* § 205, 42 U.S.C. § 405.

<sup>3</sup> The Numident record for each numberholder also identifies (1) any changes to the original information provided by the numberholder (for example, name changes and revisions to citizenship status) and (2) an account of all replacement SSN cards obtained.

<sup>4</sup> SSA provides verification services such as the Consent Based SSN Verification Service, a verification service available for a fee to enrolled private companies and Federal, State, and local government agencies; and its SSN Verification Service, which employers can use to improve their wage-reporting process by verifying employees' names and SSNs.

(DHS) employment eligibility verification program supported by SSA. The purpose of E-Verify is to assist employers in verifying the employment eligibility of newly hired employees. See Appendix B for information on E-Verify.

In 2006, we reviewed SSA's Numident and determined that the information it contained was generally accurate.<sup>5</sup> However, we estimated that discrepancies in approximately 4.1 percent<sup>6</sup> of the Numident records could have resulted in incorrect feedback when submitted through E-Verify.<sup>7</sup> For example, our review showed that the Numident records contained discrepancies in numberholders' names, dates of birth, citizenship status, and/or death indications. Because our tests included SSNs that SSA had assigned since 1936, we recognized that some numberholders would no longer be working and would not attempt to correct their SSA and/or immigration records. We also recognized that some inaccuracies were due to numberholders who did not update their records with SSA.

## SCOPE AND METHODOLOGY

To achieve our audit objective, we identified a population of approximately 1.3 million original SSNs processed and assigned in Fiscal Year (FY) 2011. We excluded replacement SSN applications and original SSNs processed through SSA's Enumeration at Entry and Birth processes.<sup>8</sup> We focused on original SSNs processed by SSA staff because the Agency fully implemented its Social Security Number Application Process (SSNAP) in February 2010. SSA designed SSNAP to aid in reinforcing its enumeration policies and standardizing data collection.

Our population also included SSNs processed through SSA's FALCON Data Entry System (FALCON). FALCON is one of the data entry systems SSA uses to correct or maintain beneficiary and recipient records in its systems. For example, SSA uses FALCON, instead of SSNAP, to make Numident corrections and process SSN applications when the numberholder has a religious or cultural objection to the original number assigned them.

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<sup>5</sup> SSA OIG, *Congressional Response Report: Accuracy of the Social Security Administration's Numident File (A-08-06-26100)*, December 2006, page 5. We conducted this review at the request of the House Committee on Ways and Means, Subcommittee on Social Security.

<sup>6</sup> We developed this estimate using a stratified sampling approach for our three populations (native-born U.S. citizens, foreign-born U.S. citizens, and non-U.S. citizens).

<sup>7</sup> At the time of our 2006 review, E-Verify was known as Basic Pilot.

<sup>8</sup> The Enumeration at Entry process allows immigrants to apply for an original or replacement SSN card on Department of State (DoS) Form DS-230, *Application for Immigrant Visa and Alien Registration*, and be issued with the card once lawfully admitted as permanent residents by DHS. Enumeration at Birth is a program that allows parents to complete SSN applications for their newborns as part of hospitals' birth registration process. Both processes eliminate a visit to a field office.

The following table shows our population based on citizenship.

**Table 1: FY 2011 Audit Population by Citizenship<sup>9</sup>**

Category	Number of SSNs	Percent
Native-Born U.S. Citizens	112,033	8.4
Foreign-Born U.S. Citizens	73,495	5.5
Non-U.S. Citizens <sup>10</sup>	1,154,452	86.1
Total	1,339,980	100.0

From our population, we randomly selected a sample of 250 SSNs. For the first 50 SSNs, we compared the SSNAP record to each numberholder's Numident to ensure the data matched. To determine the accuracy of SSA's Numident data (names, dates of birth, and citizenship or alien status), we attempted to verify the information each numberholder provided SSA to obtain an SSN. We relied on State Bureau of Vital Statistics (BVS), DoS, and DHS to verify information SSA had recorded for these 50 SSNs.

We submitted SSNs through E-Verify to determine whether discrepancies between SSA's Numident and external sources that we relied on (BVSs, DoS, and DHS) could result in an E-Verify tentative nonconfirmation. While we found discrepancies in the Numident, these errors did not result in incorrect feedback when submitted through E-Verify. For those Numident fields that E-Verify relies on, we found the data reliable for all 50 cases. As such, we did not extend testing to the full sample of 250.

In our previous review, we determined that E-Verify had no control requiring additional investigation or contact with numberholders aged 90 and older before confirming employment eligibility. As such, we reviewed the 250 sample SSNs and identified 1 case where the numberholder was age 90. We submitted this SSN through E-Verify to determine whether DHS had implemented an alert that would notify employers when they submitted information that indicated an employee's age was outside of a predetermined range.

Additionally, we reviewed SSA's Numident and Master Beneficiary and Supplemental Security Records to determine whether the Agency had recorded a date of death for any of the sample 50 or the numberholder who was age 90. We did not identify any dates of death. Finally, because DHS administers the E-Verify program, we plan to share our report with its Inspector General. See Appendix C for more information regarding our scope and methodology.

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<sup>9</sup> The population does not include original SSNs processed through SSA's Enumeration at Birth or Entry processes or replacement SSNs. In addition, the numbers and percentages found in our audit population do not necessarily reflect that of the replacement card population.

<sup>10</sup> SSA's records did not contain citizenship codes for 15 foreign-born numberholders. Accordingly, we were unable to determine their citizenship status.

### ***Underlying Assumptions***

In performing our tests, we could not predict what proof of identity and work authorization documents a numberholder would present to an employer. Therefore, we made the following assumptions.

- The information the numberholder provided SSA would be the same data provided to an employer.
- The information provided to us by a BVS, DoS, or DHS was correct.<sup>11</sup>

### **RESULTS OF REVIEW**

We determined that data fields E-Verify relied on were generally accurate for Numidents SSA established in FY 2011. While we identified a few discrepancies in numberholders' names, there were fewer than we identified in our previous review. In addition, these discrepancies did not result in incorrect feedback when submitted through E-Verify.

We commend the Agency on the accuracy of its FY 2011 Numident data because quality in the enumeration process enhances the integrity of SSA's SSN and name verifications. Although administration of E-Verify is DHS' responsibility, we believe it is important to restate a limitation we identified previously with E-Verify. That is, E-Verify will confirm numberholders' employment eligibility, regardless of their age, as long as the SSN, name, date of birth, and citizenship/alien status agree with, or there are no death indicators in, SSA and/or DHS records. As discussed in our prior audits and investigations, unscrupulous individuals may use individuals' personal information, including their SSNs, for employment purposes.

As stated in our 2006 report,<sup>12</sup> we made several assumptions in performing our tests and cannot predict the types of documentation each of the sampled numberholders might present to an employer when they are attempting to prove their identities and authorization to work in the United States—as the current process allows a number of varying sources of this information.<sup>13</sup> Accordingly, our audit conclusions only pertain to the accuracy of SSA's Numident file when compared to (1) information numberholders provided to SSA when applying for their original Social Security cards and, if applicable, (2) DHS records.

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<sup>11</sup> SSA relies on documents individuals present during the SSN application process to record their names, dates of birth, and citizenship or legal alien status in SSNAP. SSA, POMS, RM 10210.020 (October 13, 2011).

<sup>12</sup> *Congressional Response Report*, supra note 5, at page 4.

<sup>13</sup> Up to 29 documents issued by various Federal, State, and local awarding agencies are valid for completing the *Employment Eligibility Verification* (Form I-9), which is legally required for every newly hired employee. Acceptable records include (1) DHS identity and work authorization documents; (2) U.S. passports; (3) SSN cards; (4) State and local government records; and (5) records from schools, medical facilities, and the military. See 8 C.F.R. § 274a.2.

## **Numident Records Established in FY 2011 Generally Accurate**

Based on the results of our current review, we believe SSA's Numident file records established in FY 2011 were generally accurate. Of the 50 Numident records reviewed, we identified 3 that contained variances in the spelling or placement of the numberholder's name when compared to DHS records. In one case, SSA recorded the name "Bravo" as "Brovo" on the Numident record. In the other two cases, DHS had multiple names recorded in the first or last name field, but the Numident only contained one name in each position. After testing the names from the Numident and DHS records, E-Verify returned a "confirmation" for each SSN tested. While SSA may have misspelled or did not input the complete name for these numberholders, E-Verify data routines allow for some name variances. As indicated above, these discrepancies did not result in an E-Verify tentative nonconfirmation.

## **E-Verify Limitations**

We commend the Agency on the accuracy of its FY 2011 Numident data. However, we believe it important to reiterate a limitation we identified previously with E-Verify, although administration of E-Verify is DHS' responsibility.

We determined that E-Verify confirms employment eligibility, without some additional notification to, and attestation from, the employer for numberholders who are younger or older than a predetermined age. That is, unless the Numident contains a death indicator, E-Verify will confirm these numberholders' employment eligibility as long as their SSN, name, date of birth, and citizenship/alien status agree with SSA and DHS records. As revealed in our prior audits and investigations, unscrupulous individuals may use individuals' personal information, including their SSNs, for employment purposes.

Of the SSNs reviewed, we identified one numberholder who was age 90 and seven numberholders who were under age 7. We tested the eight records through E-Verify, and all confirmed eligibility for employment. While we understand there are increased numbers of individuals past retirement age in the workforce and some children under age 7 may work, we believe E-Verify needs a front-end control that requires employers to affirm that date of birth information submitted for employees whose ages are outside of a predetermined range is correct before E-Verify confirms employment eligibility.

In 2006,<sup>14</sup> we identified this vulnerability regarding the aged in E-Verify and emphasized in our report that E-Verify should send an alert notice to employers when an employee claims to have been born outside of a predetermined age. We also stated an alert would ensure that (1) no employee attempts to misuse the identity of an aged person and (2) the employer does not inadvertently or intentionally overlook the misuse of the aged person's name, SSN, and date of birth. In its informal comments to our 2006 report, SSA pointed out that it is illegal for employers to discriminate based on

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<sup>14</sup> *Congressional Response Report*, supra note 5, at pages 8 and 13.

age, and use of an indicator for individuals outside a specified age would require a new or amended routine under the *Privacy Act of 1974* to permit disclosure. SSA also pointed out that DHS Form I-9 already requires that employers certify that the documents submitted by an employee appear to be genuine and relate to that employee. We are sensitive to the possibility of age discrimination and understand the legal and contractual modifications that would be required with implementing an alert to employers requiring them to certify that the submitted age of certain employees is correct. However, we would be remiss if we did not point out this vulnerability in the current process.

## **CONCLUSION AND RECOMMENDATION**

We commend the Agency on the accuracy of the FY 2011 data we tested in the Numident. We found discrepancies in a few numberholders' names, but E-Verify data routines allow for some variances, and it confirmed these individuals' work eligibility. However, E-Verify had no control requiring additional review or employer certification of data submitted for numberholders who are young children or aged before E-Verify confirmed their work eligibility. Accordingly, we recommend that SSA encourage DHS, or assist DHS if appropriate, to enhance E-Verify through implementation of a front-end system alert that is sent to employers who must attest to the accuracy/truthfulness of information they submit for employees under or over a predetermined age before E-Verify confirms these employees' work eligibility.

## **AGENCY COMMENTS**

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

## **OTHER MATTER**

### **Evidentiary Documentation Not Always Recorded**

During our review, we determined that two SSN applications processed in FALCON in FY 2011 did not have any documentary evidence recorded. FALCON is one of the data entry systems that SSA uses to correct erroneous data identified while maintaining beneficiary and recipient records in its systems. SSA policy generally requires that field office personnel complete a paper SSN application before processing SSNs through FALCON. Policy also requires that SSA personnel annotate on the application the evidence applicants submitted.

For one sample SSN, neither of SSA's enumeration systems nor the paper SSN application reflected the evidentiary documents the applicant presented to SSA. When we discussed this issue with SSA personnel, they told us that FALCON does not contain a field that permits staff to record documentary evidence. However, SSA stated that field office personnel should have annotated evidence presented in the "Evidence Submitted" block of the paper SSN application.

In the other SSN case, SSA told us that it did not process a paper SSN application because policy does not require one when staff discover and correct a keying error.<sup>15</sup> However, this process resulted in SSA's enumeration system overwriting data on the numberholder's Numident, which in this instance was originally created in 1966. Because SSA retained paper information regarding the correction for only 60 days, the Agency could not confirm the data field it corrected.<sup>16</sup>

If SSA does not comply with policy and record evidence when it uses FALCON to process an SSN application, an audit trail does not exist that validates the legitimacy of such a transaction. In addition, when SSA uses FALCON, Numident data is overwritten, which diminishes the integrity of the enumeration process. We discussed these findings with SSA and the Agency told us that it is currently in the process of identifying various enumeration workloads processed in FALCON that it can incorporate into SSNAP in FYs 2013 and 2014. We are encouraged that SSA continues to enhance its enumeration process. We will monitor the Agency's progress in incorporating FALCON enumeration workloads into SSNAP and may make further recommendations in future audits, as necessary.



Patrick P. O'Carroll, Jr.

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<sup>15</sup> According to SSA, keying errors include a misspelled name or incorrect date of birth.

<sup>16</sup> According to SSA, it now has the capability to store evidentiary documentation indefinitely for those SSNs processed through FALCON.

# *Appendices*

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APPENDIX A – Acronyms

APPENDIX B – E-Verify

APPENDIX C – Scope and Methodology

APPENDIX D – Agency Comments

APPENDIX E – OIG Contacts and Staff Acknowledgments

## Acronyms

BVS	Bureau of Vital Statistics
C.F.R.	Code of Federal Regulations
DHS	Department of Homeland Security
DoS	Department of State
FALCON	FALCON Data Entry System
FY	Fiscal Year
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
Stat.	Statute
U.S.	United States
U.S.C.	United States Code

### Forms

DS-230	<i>Application for Immigrant Visa and Alien Registration</i>
Form I-9	<i>Employment Eligibility Verification</i>
Form I-94	<i>Arrival/Departure Record</i>

### E-Verify

E-Verify (formerly Basic Pilot) is a Department of Homeland Security (DHS) initiative supported by the Social Security Administration (SSA) through a Memorandum of Understanding between the two agencies.<sup>1</sup> E-Verify assists employers in verifying the employment eligibility of newly hired employees. Participating employers register online with DHS to use the Internet-based system.

The employer must complete a DHS-issued Form I-9, *Employment Eligibility Verification*, for each employee and enter elements of these data into E-Verify within 3 days of hiring the employee. The information entered includes the employee's Social Security number (SSN), name, date of birth, and whether the new hire indicated he/she was a U.S. citizen and, if not, the Alien Registration or I-94 admission number.<sup>2</sup>

E-Verify first checks the information entered against SSA's Numident to verify the name, SSN, and date of birth of newly hired employees, regardless of citizenship. If that information matches the Numident and the employee indicates that he/she is a U.S. citizen, E-Verify confirms employment eligibility. However, if the information matches and the employee indicates that he/she is a lawful permanent resident or an alien authorized to work, E-Verify checks the data against DHS' databases. In addition, for all naturalized citizens whose citizenship status SSA cannot confirm, but whose other data matched SSA's records, DHS will determine their current work authorization status.

E-Verify sends employers a message indicating whether the employee is employment-authorized or there is a mismatch with SSA or DHS data. The employer will receive notification of "SSA Tentative Nonconfirmation" of employment eligibility when the SSN, name, or date of birth does not match the information in SSA's database or if a death indicator is present. The employer will receive notification of "DHS Tentative Nonconfirmation" of employment eligibility when DHS' databases do not show the newly hired noncitizen as authorized for employment. In these cases, the employer asks the employee whether he/she wishes to contest the Tentative Nonconfirmation. If contested, the employee must contact SSA or DHS within 8 Government working days of the notification. After the employee contacts SSA or DHS to correct the record, the employer resubmits the query through E-Verify. If E-Verify does not confirm employment eligibility after the employer resubmits the query, the employer may terminate the new hire.

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<sup>1</sup> *Illegal Immigration Reform and Immigrant Responsibility Act of 1996*, Pub. L. No. 104-208, §§ 401-405, 110 Stat. 3009-546, 655-656 (codified at 8 U.S.C. § 1324a note).

<sup>2</sup> The I-94 admission number is on DHS' Form I-94 (*Arrival/Departure Record*).

# Scope and Methodology

To accomplish our objective, we performed the following steps.

- Reviewed pertinent sections of the Social Security Administration's (SSA) policies and procedures as well as other relevant Federal laws and regulations.
- Reviewed Office of the Inspector General, Government Accountability Office, and Department of Homeland Security (DHS) reports and other relevant documents.
- Identified a population of approximately 1.3 million original Social Security numbers (SSN) that SSA processed and assigned in Fiscal Year 2011. We excluded replacement SSN applications and original SSNs processed through SSA's Enumeration at Entry and Birth processes.<sup>1</sup> We focused on original SSNs processed by SSA staff because the Agency fully implemented its Social Security Number Application Process (SSNAP) in February 2010. SSA designed SSNAP to aid in reinforcing its enumeration policies and standardizing data collection.

Our population also included SSNs processed through SSA's FALCON Data Entry System (FALCON).<sup>2</sup> FALCON is one of the data entry systems SSA uses to correct or maintain beneficiary and recipient records in its systems. For example, SSA uses FALCON, instead of SSNAP, to make Numident corrections and process SSN applications when the numberholder has a religious or cultural objection to the original number assigned to him/her.

- Randomly selected a sample of 250 SSNs from our population. For the first 50 SSNs, we compared the SSNAP record to each numberholder's Numident<sup>3</sup> to ensure the data matched. To determine the accuracy of SSA's Numident data (names, dates of birth, citizenship or alien status), we attempted to verify the information each numberholder provided SSA to obtain an SSN. Accordingly, we verified

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<sup>1</sup> The Enumeration at Entry process allows immigrants to apply for an original or replacement SSN card on Department of State (DoS) Form DS-230, *Application for Immigrant Visa and Alien Registration*, and be issued with the card once lawfully admitted as permanent residents by DHS. Enumeration at Birth is a program that allows parents to complete SSN applications for their newborns as part of hospitals' birth registration process. Both processes eliminate a visit to a field office.

<sup>2</sup> When SSA uses FALCON, it requires a paper SSN application to be created and filed.

<sup>3</sup> The Numident includes such information as the numberholder's name, date of birth, place of birth, parents' names, citizenship status, date of death (if applicable) and the office where the SSN application was processed.

- ✓ foreign-born noncitizens' names, dates of birth, and alien status with DHS;
  - ✓ foreign-born U.S. citizens' names, dates of birth, and citizenship with DoS; and
  - ✓ native-born U.S. citizens' names, dates of birth, and citizenship with State Bureaus of Vital Statistics (BVS).
- Submitted SSNs through E-Verify to determine whether discrepancies between SSA's Numident and external sources that we relied on (BVSs, DoS, and DHS) could result in an E-Verify tentative nonconfirmation.

While we found discrepancies in the Numident, they did not result in incorrect feedback when submitted through E-Verify. For those Numident fields that E-Verify relies on, we found the data reliable for all 50 cases. As such, we did not extend testing to the full sample of 250.

- Tested E-Verify to determine whether it sent an additional contact or notice to employers for numberholders who are younger or older than a predetermined age. We submitted SSNs of individuals who were age 90 or older and age 7 or younger. We did not have any numberholders age 90 or older in the first 50 SSNs. As such, we reviewed the 250 sample SSNs and identified 1 case where the numberholder was age 90. We submitted this SSN through E-Verify only to test whether DHS had implemented a control such as issuing an alert that would notify employers when they submitted information that indicated an employee's age was outside of a predetermined range.
- Reviewed SSA's Numident and Master Beneficiary and Supplemental Security Records to determine whether the Agency had recorded a date of death for any of the sample 50 or the numberholder who was age 90. We did not identify any dates of death.

### ***Underlying Assumptions***

In performing our tests, we could not predict what proof of identity and employment eligibility a numberholder would present to an employer. Therefore, we made the following assumptions.

- The information the numberholder provided SSA would be the same data provided to an employer.
- The information provided to us by a BVS, DoS, or DHS was correct.<sup>4</sup>

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<sup>4</sup> SSA relies on documents individuals present during the SSN application process to record their names, dates of birth, and citizenship or legal alien status in SSNAP. SSA, POMS, RM 10210.020 (October 13, 2011).

Our review of internal controls was limited to obtaining an understanding of SSA's SSN assignment process, the Numident, and E-Verify as well as conducting the tests outlined above. The objective of our review was to assess the accuracy of SSA's Numident fields that are relied on by E-Verify. Accordingly, we determined that the Numident file information was generally reliable. However, we did not test the information provided by DHS and DoS. Accordingly, we cannot opine to its reliability. Any conclusions discussed in this report, which were predicated on information provided by DHS or DoS, have been annotated with the appropriate qualification.

The SSA entities audited were the Offices of the Deputy Commissioners for Operations and Systems and the Office of Income Security Programs under the Office of the Deputy Commissioner for Retirement and Disability Policy. We conducted this audit between March and May 2012 in Birmingham, Alabama. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit 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:** September 14, 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, “Accuracy of the Social Security Administration’s Numident” (A-08-12-11280)—INFORMATION

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

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

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,  
“ACCURACY OF THE SOCIAL SECURITY ADMINISTRATION’S NUMIDENT”  
(A-08-12-11280)**

**Recommendation 1**

SSA encourage DHS, or assist DHS if appropriate, to enhance E-Verify through implementation of a front-end system alert that is sent to employers who must attest to the accuracy/truthfulness of information they submit for employees under or over a predetermined age before E-Verify confirms these employees’ work eligibility.

**Response**

We agree. Through our bi-monthly meetings, we will continue to encourage the Department of Homeland Security (DHS) to create a front-end edit requiring employers to attest to the truthfulness/accuracy of the date of birth entered. Only DHS can implement modifications to the E-Verify system. We suggest that the Office of Inspector General share a copy of its findings with DHS. We consider this recommendation closed for tracking purposes.

## OIG Contacts and Staff Acknowledgments

### ***OIG Contacts***

Kimberly A. Byrd, Director, Atlanta Audit Division

Theresa Roberts, Audit Manager, Birmingham Office of Audit

### ***Acknowledgments***

In addition to those named above:

Kozette Todd, Senior Auditor

Sharice Thompson, 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-08-12-11280.

## **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.

### **Office of Technology and Resource Management**

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.