

OIG

Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

Audit Report

Assignment of Nonwork Social
Security Numbers

A-08-18-50500 | August 2020

MEMORANDUM

Date: August 7, 2020

Refer To:

To: The Commissioner

From: Inspector General

Subject: Assignment of Nonwork Social Security Numbers (A-08-18-50500)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration appropriately assigned Social Security numbers to noncitizens with a valid nonwork reason.

If you wish to discuss the final report, please call me or have your staff contact Michelle L. Anderson, Assistant Inspector General for Audit, at 410-965-9700.



Gail S. Ennis

Attachment

Assignment of Nonwork Social Security Numbers

A-08-18-50500



August 2020

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) appropriately assigned Social Security numbers (SSN) to noncitizens with a valid nonwork reason.

Background

SSA assigns nonwork SSNs to noncitizens when a (1) Federal statute or regulation requires that they provide an SSN to receive a benefit or service to which they had otherwise established entitlement or (2) State or local law requires that noncitizens provide an SSN to receive public assistance benefits. SSA assigns a nonwork SSN when noncitizens' evidence supports Old-Age, Survivors and Disability Insurance benefits; Medicare eligibility due to end-stage renal disease; eligibility for Medicaid; Temporary Assistance for Needy Families; food stamps; other Federal programs or laws; and/or State or local benefits.

In Fiscal Year 2017, SSA assigned 50,838 original nonwork SSNs. Of those, 6,805 noncitizens had filed claims with SSA for benefits—a legitimate reason for a nonwork SSN. Of the remaining 44,033 nonwork SSNs issued, 35,176 (80 percent) were issued to numberholders based on claims to benefits from the State of Florida according to SSA's records. We randomly selected 100 nonwork SSNs assigned to noncitizens who resided in Florida.

Findings

SSA staff appropriately assigned a nonwork SSN to all 100 sampled noncitizens in our Florida population because each had established, or was establishing, entitlement for, State of Florida/local benefits. We verified with Florida's Department of Children and Families that these noncitizens were entitled, or establishing entitlement, to State or local benefits. These noncitizens needed an SSN to receive Temporary Assistance for Needy Families, Medicaid, and/or food stamps.

Conclusion

Our sample results indicate SSA appropriately assigned nonwork SSNs for valid nonwork reasons. We made no recommendations.

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ABBREVIATIONS

OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSN	Social Security Number
SSNAP	Social Security Number Application Process

OBJECTIVE

The objective was to determine whether the Social Security Administration (SSA) appropriately assigned Social Security numbers (SSN) to noncitizens with a valid nonwork reason.

BACKGROUND

SSA assigns nonwork SSNs to noncitizens when a (1) Federal statute or regulation requires that noncitizens provide an SSN to receive a benefit or service to which they otherwise established entitlement or (2) State or local law requires that noncitizens provide an SSN to receive public assistance benefits.¹ SSA assigns a nonwork SSN when noncitizens provide evidence to support their need for an SSN because they are eligible for Old-Age, Survivors and Disability Insurance benefits; Medicare due to end-stage renal disease; for Medicaid;² Temporary Assistance for Needy Families; food stamps; other Federal programs or laws;³ and/or State or local benefits.⁴

When applying for a nonwork SSN, a noncitizen “. . . must provide . . . a letter [to SSA] from the appropriate government entity that explains the need for the SSN.”⁵ SSA staff inputs this information in the Social Security Number Application Process (SSNAP).⁶ SSNAP is a Web-based application that SSA employees use when they take individuals’ original and replacement SSN card applications. To facilitate staff intake of the SSN application, SSNAP provides policy reminders and drop-down menus, such as a list of valid nonwork reasons for staff to select.

¹ SSA, *POMS*, RM 10211.600, A.1 (June 28, 2013). State/local law have other requirements noncitizens must meet to be entitled. Some other requirements include residence within the State, low-income, and in need of health care/insurance assistance. See [Benefits.gov](https://www.benefits.gov), *Florida Temporary Assistance for Needy Families (TANF): Program Requirements*, [benefits.gov](https://www.benefits.gov) (last visited March 11, 2020); Florida Department of Children and Families, *Food Assistance Program Fact Sheet*, p.2 (October 2019); [Benefits.gov](https://www.benefits.gov), *Florida Medicaid: Program Requirements*, [benefits.gov](https://www.benefits.gov) (last visited March 11, 2020).

² Medicaid eligibility flows from Supplemental Security Income entitlement in most States. A noncitizen whose eligibility for Medicaid does not derive from Supplemental Security Income entitlement must provide documentation that he/she meets Medicaid eligibility or some other valid nonwork reason. SSA, *POMS*, RM 10211.610, A.3 (July 31, 2014).

³ According to policy, there may be other Federal laws requiring that an individual furnish his/her SSN before the benefit is paid or service received. SSA staff should check with regional office staff regarding whether the law or regulation the agency cites meets the requirements for assigning an SSN. SSA, *POMS*, RM 10211.610, A.6 (July 31, 2014).

⁴ SSA, *POMS*, RM 10211.610, A (July 31, 2014).

⁵ SSA, *POMS*, RM 10211.600, A.2 (June 28, 2013).

⁶ SSA refers to its enumeration system as SSNAP, which SSA fully implemented in 2010.

In Fiscal Year 2017, SSA assigned 50,838 original nonwork SSNs. Of those, 6,805 noncitizens had filed claims with SSA for benefits—a legitimate reason to need a nonwork SSN. Of the remaining 44,033 nonwork SSNs issued, 35,176 (80 percent) were issued to numberholders based on claims to benefits from the State of Florida according to SSA’s records. To confirm numberholders’ eligibility for State or local benefits, we contacted the State or locality that provided those benefits. Since 80 percent of the SSNs issued were related to benefits from Florida, we decided to concentrate on Florida where we could contact one State while testing 80 percent of our population. We established an agreement with Florida and randomly selected 100 nonwork SSNs assigned to noncitizens who resided in Florida. See Appendix A for our audit scope and methodology.

RESULTS OF REVIEW

SSA staff appropriately assigned a nonwork SSN to all 100 sampled noncitizens in our Florida population because each had established, or was establishing, entitlement for, State of Florida/local benefits. We verified with Florida’s Department of Children and Families that these noncitizens were entitled, or establishing entitlement, to state/local benefits. These noncitizens needed an SSN to receive Temporary Assistance for Needy Families, Medicaid, and/or food stamps.

CONCLUSION

Our sample results indicate SSA appropriately assigned nonwork SSNs for valid nonwork reasons. We made no recommendations.

AGENCY COMMENTS

SSA provided comments to the report, see Appendix B.



Michelle L. Anderson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed applicable sections of Federal laws and regulations, the Social Security Administration’s (SSA) policies and procedures, and prior Office of the Inspector General reports.
- Obtained a data extract from SSA of 50,838 original nonwork Social Security numbers (SSN) SSA assigned in Fiscal Year 2017. Of those, 6,805 noncitizens had filed claims with SSA for benefits—a legitimate reason to need a nonwork SSN. Of the remaining 44,033 nonwork SSNs issued, 35,176 (80 percent) of numberholders were issued an SSN based on claims to benefits from the State of Florida according to SSA’s records. Since 80 percent of our population related to benefits from Florida and the rest of our population was spread across the country, we decided to concentrate on Florida where we could contact one State while testing 80 percent of our population. We randomly selected 100 nonwork SSNs assigned to noncitizens who resided in Florida.
- Contacted Florida’s Department of Children and Families and established an agreement to verify information about the 100 numberholders to whom SSA issued nonwork SSNs to confirm whether they were eligible for State or local benefits.

We conducted our review in Birmingham, Alabama, between May 2019 and February 2020. We determined the data used for this audit were sufficiently reliable to meet our audit objective. The primary entity audited was the Office of the Deputy Commissioner for Operations. 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 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.

Appendix B – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: July 24, 2020

Refer To: S1J-3

To: Gail S. Ennis
Inspector General

A handwritten signature in blue ink that reads "Stephanie Hall".

From: Stephanie Hall
Chief of Staff

Subject: Office of the Inspector General Draft Informational Report, "Assignment of Nonwork Social Security Numbers" (A-08-18-50500) -- INFORMATION

Thank you for the opportunity to review the draft report. We are pleased the review found our staff followed policy and assigned non-work Social Security Numbers (SSN) accurately in every case reviewed. We continue our longstanding efforts to ensure the timely and accurate assignment of SSNs.

Please let me know if we can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.

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