OFFICE OF
THE INSPECTOR GENERAL

SOCIAL SECURITY ADMINISTRATION

FOLLOW-UP: THE SOCIAL SECURITY ADMINISTRATION'S INTERNAL USE OF EMPLOYEES' SOCIAL SECURITY NUMBERS

June 2008   A-13-07-27164

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.
- ○ 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

OBJECTIVE

Our objective was to determine the extent to which the Social Security Administration
(SSA) implemented the recommendations from our August 2004 report, *The Social
Security Administration's Internal Use of Employees' Social Security Numbers.*

BACKGROUND

The Social Security number (SSN) was created in 1936 as a means of tracking workers'
earnings and eligibility for Social Security benefits. Nevertheless, the SSN has become
a de facto national identifier used by Federal agencies, State and local governments,
and private organizations. The expanded use of the SSN as a national identifier
provides a tempting motive for unscrupulous individuals to acquire and use it for illegal
purposes.

Federal agencies frequently ask individuals for their SSNs because, in certain
instances, the law requires that they do so. Federal agencies have a responsibility to
limit the risk of unauthorized disclosure of SSNs. Although no single Federal law
regulates overall use and disclosure of SSNs by Federal agencies, the *Freedom of
Information Act of 1966*, the *Privacy Act of 1974*, and the *Social Security Act
Amendments of 1990* generally govern disclosure and use of SSNs.

Our 2004 report contained several concerns about the use of the employees' SSNs and
made five recommendations to address these issues. The Agency agreed with all of
these recommendations. In this audit, we reviewed the extent to which SSA had
implemented the five recommendations. See Appendix B for a detailed discussion of
the Scope and Methodology.

In addition, we reviewed information SSA reported pertaining to the Office of
Management and Budget's (OMB) request that Federal agencies, including SSA, review
their use of SSNs. This request relates to the President's Identity Theft Task Force

September 2006 interim recommendations. Specifically, the Task Force recommended that OMB require that all Federal agencies review their use of SSNs to determine whether such use can be eliminated, restricted, or concealed in agency business processes, systems and electronic forms. On January 16, 2007, the Agency reported to OMB how its business processes used SSNs as well as alternatives, vulnerabilities and safeguards for SSNs. During our review, we examined the accuracy of the information reported that pertained to Agency employees' SSNs. See the "Other Matter" section and Appendix C for the results of our review.

RESULTS OF REVIEW

SSA took corrective action on all recommendations from our August 2004 report, *The Social Security Administration's Internal Use of Employees' Social Security Numbers*. In addition, the Agency took other actions regarding the use of its employees' SSNs. Below, we discuss Recommendations 1 through 5, the corrective actions taken by the Agency, and the results of our current review.

   Recommendation 1: We recommend SSA remind employees to secure any system or document containing employee SSNs when these systems or documents are not being used.

The Agency responded its Office of Systems Security Operations Management and Chief Security Officer issue periodic and ad hoc bulletins to SSA employees concerning systems security matters. Generally, the bulletins focus on systems security issues that impact a range of users and developers or are applicable Agency-wide. SSA has established systems security policies and procedures that require a suite of controls over systems that contain sensitive data, such as SSA clients' SSNs and employee SSNs. Therefore, SSA will take steps to ensure managers and staff adhere to the existing procedures and handling documents associated with administrative activities.

Our current review found the Agency had taken several actions to remind employees to secure systems and documents that contain employees' SSNs. On March 28, 2005, SSA issued the bulletin, *Sensitive Information Reminde*r, which reminds employees to secure systems and/or documents containing employee SSNs. According to Agency staff, all policies and procedures related to protecting employees' SSNs should be represented in the *Information Systems Security Handbook* and the *Information System Officer Guide*. We reviewed the January 2007 *Security Handbook* and found it contained information about handling employees' SSNs.

Also, information about handling and securing Personally Identifiable Information,[1] which can include SSNs, has been added to the Agency's Office of Systems Security Operations Management's website. We reviewed the website and found it provided guidance regarding the handling of employees' SSNs.

Recommendation 2: We recommend SSA consider using asterisks, if determined to be cost-effective, to hide the employee SSN on computer screens and reports in all existing and future systems. Asterisks are currently used in the Mainframe Time and Attendance System to hide the employee SSN.

SSA responded it would consider the costs and benefits of using asterisks when developing future enhancements.

During our current review, we examined the 38 automated information systems the Agency reported as using employees' SSNs. Of the 38, we found the Agency modified the computer screen display of employees' SSNs for 21 systems. Of the remaining 17, the Agency does not plan to modify the Travel Manager System. The new travel system, E^2 Solutions, is scheduled to be fully implemented by spring 2009. One aspect of E^2 Solutions is the ability to mask the entire SSN.

For all 38 systems, Agency staff reported there were mechanisms in place to safeguard employees' SSNs. For example, security profiles are used to limit access to only authorized employees. Access to the systems is also monitored through the use of "in-line audit systems" that check transactions for improper activity. We verified the manner in which employees' SSNs were shown on computer screens to system users for the 38 systems. After our review, the Agency reported updates to three additional systems. However, we did not verify the accuracy of this information. See Appendix D for the results of our review and reported updates concerning the computer screen display of employees' SSNs.

Recommendation 3: We recommend SSA identify the forms that request the employee's SSN. If the SSN is not required, eliminate its use on these forms.

In response to our prior audit, SSA stated it would modify internal forms and consider the continuing need to capture the SSN.

During our current review, Agency staff explained SSA was revising its forms that requested employees' SSNs. For example, in October 2007, staff reported five of SSA's employee-related forms had been modified. These forms were changed to request the last four digits of the SSN. As of October 3, 2007, we verified certain Agency forms had been modified concerning the collection of employees' SSNs. After

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[1] OMB Memorandum M-07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information* defines personally identifiable information as information that can be used to distinguish or trace an individual's identity, such as their name, SSN, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

our review, the Agency reported updates to 11 of its forms. We did not verify the accuracy of this information. See Appendix E for the forms we reviewed and the subsequent information reported for the display of employees' SSNs on SSA's forms.

Recommendation 4: We recommend SSA determine if it is cost beneficial to use an alternative primary identifier for its employees, such as the one used in the *On-Line University*[2], for all future SSA systems. If determined to be cost-beneficial, then implement an alternative primary identifier.

SSA agreed with our recommendation but indicated it was bound by Executive Order 9397 and the Civil Service Commission (now known as the Office of Personnel Management [OPM]) mandate to use the SSN as the identifying number for Federal employees. We verified OPM is developing an alternative identifier for all Federal employees, known as the Unique Employee Identifier (UEID). OPM has not developed all the UEID business requirements. Once the business requirements are developed, OPM will need to develop the information technology resources to support Federal agencies' use of the UEID.

Based on the planned use of the UEID by Federal agencies, SSA officials reported it is not financially prudent to develop an SSA-specific alternative primary identifier for its employees and/or modify its systems at this time. When OPM has implemented use of the UEID, the Agency can consider the modifications and timeframes required to implement the use of the UEID in the context of its budget and available resources.

Recommendation 5: We recommend SSA consider and use, as indicated in Agency policy, encryption if feasible and not cost prohibitive.

SSA responded it used dedicated lines and Connect Direct when transmitting payroll information to the Department of the Interior (the example cited in the prior report) and therefore believed it was in compliance with the policy as written. In our current review, we verified that SSA payroll information transmitted from the Agency to the Department of the Interior is encrypted.

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[2] SSA implemented SSA GoLearn on April 1, 2005 as a replacement for On-Line University. On April 1, 2008 SSA Learn was implemented as a replacement for SSA GoLearn.

CONCLUSION AND RECOMMENDATION

Based on our observations, examination of data, and discussions with SSA staff, we believe the recommendations from our prior report have been addressed by the Agency. SSA had taken action to implement the five recommendations from our August 2004 report. However, to further protect its employees' SSNs, we recommend SSA continue removing or minimizing the use of these SSNs in its systems and forms.

AGENCY COMMENTS

SSA agreed with our conclusion and recommendation. See Appendix G for the full text of SSA's comments.

OTHER MATTER

Other Actions Regarding the Use of Social Security Administration Employees' Social Security Numbers

During our current review, we examined other SSA actions regarding the use of employees' SSNs. On January 16, 2007, SSA reported to OMB how its business processes used SSNs, as well as alternatives, vulnerabilities and safeguards for SSNs. We examined the accuracy of the data applicable to the Agency's use of employees' SSNs. Based on our observations, review of the data, and discussions with SSA staff, we believe the information SSA reported to OMB on actions taken and pending regarding the use of employees' SSNs was accurate. See Appendix C for the specific employee-related information systems and forms included in our examination.

In a related matter, on May 22, 2007, OMB issued Memorandum M-07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information.* According to OMB's Memorandum, safeguarding personally identifiable information[3] in the Government's possession and preventing its breach are essential to ensure the Government retains the trust of the American public. In response to the OMB memorandum, on September 28, 2007, SSA issued its plan to eliminate the unnecessary collection and use of SSNs. See Appendix F for the excerpt of the plan that relates to employees' SSNs collection and use.

Patrick P. O'Carroll, Jr.

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[3] See Footnote 1 on p. 3.

Appendices

Acronyms

OMB	Office of Management and Budget
OPM	Office of Personnel Management
SSA	Social Security Administration
SSN	Social Security Number
UEID	Unique Employee Identifier

Scope and Methodology

To accomplish our objective, we:

- Identified and reviewed applicable laws and regulations.

- Identified and reviewed relevant Social Security Administration (SSA) policies and procedures.

- Identified and reviewed prior relevant audits.

- Interviewed SSA personnel responsible for controls over the use of Social Security numbers (SSN).

- Identified and reviewed pertinent SSA employee forms that include SSNs.

- Identified and reviewed pertinent SSA employee forms that include unique identifiers other than SSNs.

- Determined the Agency's internal use of SSNs.

- Observed the safeguards implemented by the Agency.

In addition, we observed the display and use of employees' SSNs in information systems, reviewed the display of SSNs on various forms and system-related data, and interviewed Agency staff. See Appendix C for a list of the information systems and forms reviewed. Also, we reviewed SSA's response to Office of Management and Budget Memorandum M-07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*, as it relates to the unnecessary collection and use of Agency employees' SSNs (see Appendix F).

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 objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Our audit was performed between June and October 2007 in Baltimore, Maryland. The entities audited were the Offices of Human Resources; General Counsel; Budget, Finance, and Management, Acquisition and Grants; and Systems.

The Social Security Administration's Response to the Office of Management and Budget on the Use of Social Security Numbers

We examined the accuracy of information reported by the Social Security Administration (SSA) to the Office of Management and Budget (OMB) pertaining to the use of Agency employees' Social Security numbers (SSN). In its September 2006 Summary of Interim Recommendations, the President's Identity Theft Task Force recommended that OMB require that all Federal agencies review their use of SSNs. Specifically, agencies were to determine whether such use can be eliminated, restricted, or concealed in agency business processes, systems and electronic forms.

On January 16, 2007, the Agency reported how its business processes used SSNs, as well as alternatives, vulnerabilities and safeguards for SSNs. We examined the data applicable to the use of Agency employees' SSNs. Based on our observations, review of the data, and discussions with SSA staff, we believe the information SSA reported to OMB on actions taken and pending regarding the use of employees' SSNs was accurate. The following identifies, by business processes, the information systems and forms we reviewed related to employees' SSNs.

Budget, Financial and Administrative Services Process

System/Form Name

Travel Manager System
Travel Credit Card Application
Administrative Payments Information Network System
Finance Interactive Voice Response System
Payments Claims and Enhanced Reconciliation System
Third Party Payment System
Purchase Card Application
Tally Up System[1]
Suitability Checks for Employees and Contractors
Comprehensive Integrity Review Process System
Audit Trail System

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[1] The Tally Up System is used to compute the Income Tax Relocation Allowance. SSA reports this information to the Internal Revenue Service.

Human Resources Process

System/Form Name

Collection of Time & Attendance Data
Mainframe Time & Attendance System
Transmission of Time & Attendance Data
Job Announcement Status Check
Awards Database
Official Personnel Folder Tracking System
Performance Assessment and Communications System
Mainframe Grievance Tracking System
Human Resource Management Information System
Employee Suggestion Program
Employee Assistance Program Client Database
Equal Employment Opportunity Complaint File/Complaint Form/Counseling File
Office of Civil Rights and Equal Opportunity iComplaints Database
Reasonable Accommodation Tracking System
Disability Services Team Database
Reasonable Accommodation Wizard
SSA-501-F3, *Request for Reasonable Accommodation*
Placement and Full Time Equivalent Pool Databases
Training Nomination and Authorization Form
Interactive Video Teletraining Online Course Registration Form
Interactive Video Teletraining One Touch Logon
Blackboard System[2]
Career Development Program Application
Official Union Time Tracking System

Office of General Counsel Process

System Name

Salary Overpayments
Equal Employment Opportunity Cases
Merit Systems Protection Board Cases
Electronic Freedom of Information Act System
Freedom of Information Act Processes

Office of Appeals Process

Form Name

In-House Training Registration Form

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[2] SSA's Office of Training's Blackboard is an on-line application used for registration and student logon for test taking for entry level courses.

Employees' Social Security Numbers As Displayed on the Social Security Administration's Computer Screens

For the following 38 automated information systems, we verified the manner in which Agency employees' Social Security numbers were shown on computer screens to system users.

System	Display of Employees' SSNs
Performance Assessment & Communications System (PACS)	Last 4 Digits
iComplaints	Asterisks Used
Labor Relations Case Tracking System	Not Used
EEO Time Tracking System	Not Used
Employee Suggestion Program	Removed
Blackboard	Not Used
IVT Online Registration	Not Used
IVT One-Touch Systems	Not Used
Training Online Nomination System	Removed
Travel Manager	Complete SSN
Travel Credit Card Application	Complete SSN
Administrative Payments Information Network System	Complete SSN
Finance Interactive Voice Response System	Complete SSN
Payments Claims and Enhanced Reconciliation System	Complete SSN
Third Party Payment System	Asterisks Used
Purchase Card Application	Complete SSN
Tally Up System	Complete SSN
Suitability Checks for Employees and Contractors	Complete SSN
Comprehensive Integrity Review Process System	Complete SSN
Audit Trail System	Not Used
Mainframe Time and Attendance System	Asterisks Used
Transmission of Time and Attendance Data	Complete SSN
Job Announcement Status Check	Removed*
Awards Database	Last 4 Digits
Official Personnel Folder Tracking System	Last 4 Digits
Human Resource Management Information System	Complete SSN
Employee Assistance Program Client Database	Removed
Reasonable Accommodation Tracking System	Complete SSN*
Disability Services Team Database	Complete SSN
Reasonable Accommodation Wizard	Complete SSN
Placement and Full Time Equivalent Pool Databases	Complete SSN
Career Development Program Application	Last 4 Digits*
Official Union Time Tracking System	Complete SSN
Salary Overpayments	Not Used
Equal Employment Opportunity Cases	Not Used
Merit Systems Protection Board Cases	Not Used
Electronic Freedom of Information Act System	If Provided, Complete SSN
Freedom of Information Act Processes	If Provided, Complete SSN

* After our review, the Agency reported updated information for these systems. In addition, SSA's Office of Training reported the complete SSNs for non-SSA employees is displayed on the Career Development Program Application for the Senior Executive Service candidates.   However, we did not verify the accuracy of this information.

Social Security Administration Forms: Request and Display of Employees' Social Security Numbers

During our review, we determined whether certain forms used by the Social Security Administration had been modified concerning the collection and display of its employees' Social Security numbers. Below are the forms we reviewed, and whether the forms have been or will be modified.

Form Number	Form Title	Requested Employees' SSN Data	Implementation Date of Revisions
SSA-4392	Nomination for SSA Honor Award	Last 4 Digits	Completed
SSA-3136	Application to Participate in the Leave Transfer Program	Last 4 Digits	Completed
SSA-3555	SSA Employment Agreement	Last 4 Digits	Completed
SSA-1400	Salary Recommendation	Last 4 Digits	Completed
SSA-476	Request for Official Correspondence Address	Last 4 Digits	Completed
SSA-231	PACS Performance Plan for Team Leaders	Last 4 Digits	Completed*
SSA-232	PACS Performance Plan: Managers and Supervisors	Last 4 Digits	Completed*
SSA-233	PACS Performance Plan: New Hires/Trainees	Last 4 Digits	Completed*
SSA-5072	Request for Medical Treatment	Last 4 Digits	May 2008*
SSA-171U3	Recommendation for Monetary or Time Off Awards	Last 4 Digits	Discontinued paper form in November 2007*
SSA-331	Performance Assessment for Non Supervisory Employees	Last 4 Digits	Completed*
SSA-332	Performance Assessment for Supervisory Employees	Last 4 Digits	Completed*
SSA-170	Employee Suggestion Form	Not Requested	Completed
SSA-2770	Information for reporting non-receipt of hard copy salary check	Last 4 Digits*	Completed
SSA-2771	Information for reporting non-receipt of Direct Deposit/Electronic Funds Transfer payment	Last 4 Digits*	Completed
SSA-3948	Request to Change to Part Time Employment	Not Requested	Completed*
SSA-71	Application for Leave	Not Requested	Completed*
SSA-501-F3	Request for Reasonable Accommodation	Complete SSN	
SSA-352-U10	Training Nomination and Authorization Form	Complete SSN	
	Interactive Video Teletraining Online Course Registration Form	Not Requested	
	Equal Employment Opportunity Complaint File/Complaint Form/Counseling File	Not Requested	
	Office of Disability Adjudication and Review In-House Training Registration Form	Not Requested	

* After our review, the Agency reported changes had been made to these forms. We did not verify the accuracy of this information.

Excerpt: The Social Security Administration's Implementation Plan to Eliminate the Unnecessary Use of Social Security Numbers

Office of Management and Budget (OMB) Memorandum M-07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*, issued May 22, 2007, requires that all agencies (1) review their use of Social Security numbers (SSN) in agency systems and programs; (2) identify instances in which collection or use of the SSN is superfluous; and (3) establish, within 120 days, a plan to eliminate unnecessary collection and use of SSNs within 18 months. Generally, Personally Identifiable Information refers to information that can be used to distinguish or trace an individual's identity, such as his/her name, Social Security number, biometric records etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual such as date and place of birth, mother's maiden name, etc.

In response to the OMB memorandum, on September 28, 2007, SSA issued a plan[1] to eliminate the unnecessary collection and use of SSNs. The following is an excerpt from the plan that relates to employees' SSN collection and use.

> Many personnel-related activities require interagency operability. Executive Order 9397 requires federal agencies to use SSNs as numerical identifiers for individuals in most federal records systems. Therefore, until the Executive Order is partially rescinded, and the Office of Personnel Management (OPM) develops the Universal Employee Identifier (UEID), it is not efficient to create an interim replacement identifier for employees. However, SSA has taken steps to remove the SSN from several of its personnel forms and processes.
>
> - Payroll – Mainframe Time and Attendance System displays an employee's SSN only when it is initially being entered into the system. After initial entry, asterisks are used to hide the SSN and records are accessed by using an employee's name.
>
> - Training – Uses an employee personal identification number (PIN) (6 digit number assigned to employees for systems access) to log on to the national Interactive Video Training network. Prior to June 4, 2007, employees used their SSNs to log on to the system.

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[1] As required by OMB Memorandum M-07-19, *FY 2007 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management,* issued July 25, 2007, SSA's plan for safeguarding against and responding to the breach of PII was included as an appendix to the Agency's annual Federal Information System Management Act report, issued October 1, 2007

- Career Development Program Application – The employee identifier will be converted from the SSN to the employee PIN by March 2008.

- Labor Relations – Grievance Tracking – The current application which uses the SSN will be phased out by September 30, 2007. The replacement application uses a combination of name and locator.

- Employee Suggestion Form – An online electronic process which does not use the SSN is used to process 92% of suggestions. Since electronic submission is voluntary and 8% of employees still use the paper form, the paper form was revised to eliminate the SSN in August 2007.

- Employee Assistance Program (EAP) Client Database – The current application which uses the SSN will be phased out by December 31, 2007. The new application uses the SSN only to assign a case number which will be used throughout the process.

- Equal Employment Opportunity (EEO) Complaints – A new version of the iComplaint system which masks the SSN with asterisks was implemented on July 28, 2007. The SSN is used to propagate the correct and appropriate personnel data for a given employee into the Human Resource Management Information System (HRMIS). Also, the vendor of iComplaints will make accommodations for the UEID in a future version.

- The Office of Human Resources (OHR) has reviewed all SSA forms on the Human Resources internal website to determine necessary versus unnecessary use of the SSN and is making revisions to remove the SSN on the following forms:

    o SSA-3948 – Request For Change to Part Time/Full-Time Employment – revision completed in June 2007
    o SSA-1400 – Salary Recommendation – mid September 2007
    o SSA-3555 – Employment Agreement – revision completed in August 2007
    o SSA-71 – Application for Leave – mid November 2007

- OHR determined that it is no longer necessary to collect the entire SSN on the following forms but it is still necessary to collect a part of the SSN so that the data can be associated with the correct individual. The SSN will be truncated (last four digits only) on the following forms:

    o SSA-4392 – Nomination for SSA Honor Award – mid September 2007

- o SSA-3136 – Application to Participate in the Leave Transfer Program – mid September 2007
- o SSA-2770 – Information for Reporting Non-Receipt of Hard Copy Salary Check – revision completed in August 2007
- o SSA-2771 – Information for Reporting Non-Receipt of Direct Deposit/ Electronic Fund Transfer (DD/EFT) Payments – revision completed in August 2007
- o SSA-476 – Request for Official Correspondence Address – revision completed in August 2007
- o SSA-171U3 – Recommendation for Monetary or Time Off Award – mid November 2007

- SSA-5072 – Request for Medical Treatment – is directed to employees' physicians, a non-Federal population. The form has to go through the Office of Publications and Logistics Management (OPLM) process and since it is a form that goes out to the public, OPLM has to send it to OMB for review, which usually takes nine months. OHR submitted its request to change this form in June 2007; it does not have a completion target. In the interim, SSA's nurses are instructing employees to provide only the last four digits of their SSN prior to submitting it to their doctors. We have no control over what a physician's office needs so it is conceivable that the physician's office may require the full SSN. OHR is monitoring the process for compliance with the new instruction.

- Employee Performance Plans

  - o SSA currently has two major systems in use, the Performance Assessment and Communication System (PACS) which was implemented in October 2006 and the Pass/Fail system which has been in use since 1995. Forms SSA-230, 231, 232 and 233 were created during the development of PACS to document employee performance. These forms collect the entire SSN. PACS was implemented in October 2006, as a web-based application which requires managers to input only the last four digits of an employee's SSN. The paper SSA-231, 232 and 233 forms are available to be used in rare instances in which a supervisor has to issue a rating, but cannot access the web-based system. OHR plans to revise these forms to collect only the last four digits of the SSN by December 2007.

- o Some of the union contracts for a small portion of SSA employees still require SSA to use a Pass/Fail system. The Pass/Fail system uses the SSA-331 and SSA-332 to document employee performance. These forms collect the entire SSN. OHR is working on revising both of these forms to collect only the last four digits of the SSN. The revisions should be completed by mid November 2007.

- OHR has had a number of internal discussions about removing or masking the SSN from other applications, but it is deferring action until OPM proceeds with the UEID.

Agency Comments

SOCIAL SECURITY

MEMORANDUM

Date: April 28, 2008   Refer To: S1J-3

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

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

Subject: Office of the Inspector General (OIG) Draft Report, "Follow-up: The Social Security Administration's Internal Use of Employees' Social Security Numbers" (A-13-07-27164)— INFORMATION

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

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

Attachment:
SSA Response

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "FOLLOW-UP: THE SOCIAL SECURITY ADMINISTRATION'S INTERNAL USE OF EMPLOYEES' SOCIAL SECURITY NUMBERS" (A-13-07-27164)

Thank you for the opportunity to review and comment on the draft report. Our response to the recommendation is provided below.

Recommendation 1

Continue removing or minimizing the use of these Social Security numbers (SSN) in our systems and forms.

Response

We agree. We will continue to remove or minimize the use of SSNs in our systems and forms wherever possible.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Shirley E. Todd, Director, General Management Audit Division, (410) 966-9365

Randy Townsley, Audit Manager, (410) 966-1039

Acknowledgments

In addition to those named above:

Linda Webester, Auditor-in-Charge

Nicole Gordon, Auditor

For additional copies of this report, please visit our web site at www.socialsecurity.gov/oig or contact the Office of the Inspector General's Public Affairs Specialist at (410) 965-3218. Refer to Common Identification Number A-13-07-27164.

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Social Security Advisory Board

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The Office of the Inspector General (OIG) is comprised of an Office of Audit (OA), Office of Investigations (OI), Office of the Chief Counsel to the Inspector General (OCCIG), 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.