Report Summary

Social Security Administration Office of the Inspector General

February 2009



Objective

To assess the Social Security Administration's (SSA) process for assigning Social Security numbers (SSN) to individuals in the Commonwealth of the Northern Mariana Islands (CNMI) and American Samoa.

Background

Each of these insular areas has its own government and immigration system. Individuals born in the CNMI are U.S. citizens and those in American Samoa are U.S. nationals (considered the same as U.S. citizens for SSA purposes). Individuals in these insular areas can apply for an SSN at SSA's field offices in Saipan, CNMI, and Pago Pago, American Samoa. In 2007, SSA assigned original SSNs to over 5,000 individuals based on applications processed at the 2 field offices.

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BEPDF/A-08-08-18098.pdf

Assignment of Social Security Numbers to Individuals in the Commonwealth of the Northern Mariana Islands and American Samoa (A-08-08-18098)

Our Findings

We are concerned that SSA's policies and practices may place it at-risk for improper SSN assignment to individuals in the CNMI and American Samoa. Specifically, because SSA relies on the CNMI and American Samoa immigration systems (not the Department of Homeland Security immigration verification and screening), we are concerned about the potential that SSA may assign SSNs to individuals who may not be who they purport to be. However, during our audit, the United States enacted legislation applying U.S. immigration law to the CNMI. We are unaware of any proposed legislation to apply U.S. immigration law to American Samoa. In addition, SSA processed noncitizen SSN applications at its Saipan and Pago Pago field offices without written operating policies and procedures. Finally, field office personnel in Pago Pago, American Samoa, did not always document their independent verification of birth records for individuals claiming U.S. citizenship.

Our Recommendations

SSA needs to:

- Establish written policies and procedures, including a list of acceptable immigration and work-authorization documents, for assigning SSNs to noncitizens in the CNMI and American Samoa.
- 2. Until the Department of Homeland Security assumes responsibility for the CNMI immigration, instruct the Saipan field office personnel to compare signatures on immigration documents provided by noncitizens with a signature list of authorized immigration officials to ensure they match.
- Reemphasize to Pago Pago field office personnel the importance of following all enumeration policies and procedures.

SSA agreed with the recommendations.