

Summary of Monitoring Controls for the Consent Based Social Security Number Verification Program

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Objective

To assess the Social Security Administration's (SSA) monitoring controls for the Consent Based Social Security Number Verification (CBSV) program.

Background

In Fiscal Year 2009, SSA implemented the CBSV program, which is a centralized, automated process that quickly assists companies with consent-based Social Security number (SSN) verification for non-program-related reasons.

To use CBSV, companies must complete the registration process; pay registration and transaction fees; and obtain written consent from the individual before verifying their SSN, as required by the *Privacy Act*. Companies are required to hire a certified public accountant to ensure they are complying with the *User Agreement* and are properly obtaining consent.

Our Findings

SSA's monitoring controls for the CBSV program need to be improved. While the *User Agreement* required that participating companies include the date of birth (DoB) on the consent form, SSA did not require the DoB as part of the matching criteria. As a result, SSA verified about 227,000 names and SSNs without verifying DoBs, of which 337 related to children (2 months to 17 years). Because SSA verified the names and SSNs without a DoB, it did not alert participating companies to possible discrepancies between the DoBs provided by individuals and the DoBs recorded in SSA records. These false positive responses may have contributed to the misuse of children's identities. In addition, we found the consent form did not require that the relationship be specified for individuals who gave consent on behalf of 126 children who ranged from ages 2 months to 11 years. Finally, SSA did not always require that participating companies conduct an annual compliance review. Specifically, we found

- 15 (26 percent) companies did not have a compliance review;
- 17 (29 percent) companies were in various stages of the compliance review process; and
- 26 (45 percent) companies had a compliance review.

Our Recommendations

We recommended SSA:

1. Make a systems change to the CBSV program to prevent the processing of verification requests without a DoB.
2. Justify and document why the eight companies were not required to have a compliance review but continued to use CBSV.
3. Require that participating companies conduct a compliance review at least annually.

SSA agreed with Recommendations 2 and 3, but disagreed with Recommendation 1.