

The Social Security Administration's Authentication Risk
Assessment for the Internet Social Security Number
Replacement Card Project
A-14-14-24130



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Office of Audit Report Summary

Objective

To evaluate the Social Security Administration's (SSA) authentication risk assessment and mitigation strategy for its planned Internet Social Security Number Replacement Card (iSSNRC) application.

Background

SSA is developing iSSNRC—an online application that will allow adult U.S. citizens who meet certain criteria to request replacement Social Security number cards through the Agency's *my Social Security* portal.

The Office of Management and Budget (OMB) requires that agencies review their electronic transactions to ensure authentication processes provide the appropriate level of identity assurance. SSA developed a process to comply with OMB's authentication assurance guidance. Agency staff assesses risks and translates their risk ratings into an application assurance level. If the SSA component sponsoring the project believes a lower assurance level is appropriate, the sponsor can prepare a Risk Mitigation Strategy. The results of the risk assessment and, if applicable, the Risk Mitigation Strategy are then presented to the eServices Governance Steering Committee (eGSC) for executive-level review. The eGSC makes the final determination on the level of assurance and any mitigating factors.

Findings

SSA's authentication risk assessment of the iSSNRC determined the application required authentication assurance Level 3, meaning—based on the risks associated with the application—SSA must have a high degree of confidence that users are who they claim to be. However, in accordance with OMB guidance, the Agency opted to develop a Risk Mitigation Strategy and plans to implement iSSNRC with Level 2 identity assurance. Level 2 assurance provides some confidence that users are who they claim to be. We identified some concerns with the mitigating controls SSA plans to use for iSSNRC.

Based on an October 2014 Executive Order, SSA anticipates upgrading authentication to its *my Social Security* portal to require multifactor authentication. Since iSSNRC users must access the application through the *my Social Security* portal, enhancing the authentication of *my Social Security* will increase SSA's confidence in iSSNRC users' identities. However, given the risks associated with an online application that will result in the issuance of replacement Social Security number cards, we encourage SSA to continue developing mitigating controls for iSSNRC.

Matters for Consideration

We believe SSA should determine how expected enhancements to the *my Social Security* authentication processes will affect the risks associated with iSSNRC. However, despite the planned enhancements to *my Social Security*, SSA must ensure sufficient controls are included in iSSNRC to reduce the risk of fraud. We believe the Agency should implement the iSSNRC incrementally and carefully monitor implementation to ensure security controls are effective and operate as intended.