
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**SOCIAL SECURITY NUMBER
CARDS ISSUED AFTER DEATH**

April 2005

A-06-03-13078

AUDIT REPORT



Mission

We improve SSA programs and operations and protect them against fraud, waste, and abuse by conducting independent and objective audits, evaluations, and investigations. We provide timely, useful, and reliable information and advice to Administration officials, the 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

By conducting independent and objective audits, investigations, and evaluations, we are agents of positive change striving for continuous improvement in the Social Security Administration's programs, operations, and management and in our own office.



SOCIAL SECURITY

MEMORANDUM

Date: April 20, 2005

Refer To:

To: The Commissioner

From: Inspector General

Subject: Social Security Number Cards Issued After Death (A-06-03-13078)

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) complied with its policy concerning the issuance of original and replacement Social Security number (SSN) cards for individuals who were deceased.

BACKGROUND

Each year, SSA processes millions of applications for SSN cards. Of the more than 16 million applications processed each year from Fiscal Years (FY) 1999 through 2002, over 11 million were replacement cards. SSA recognizes that, over time, the SSN has become a primary means of identification in both the public and private sectors and that, as use of the SSN has grown, so has identity fraud. To this end, SSA has a role in combating identity fraud through the prevention and detection of SSN misuse.¹

Under limited circumstances, SSA may assign an original SSN after a person's death.² For example, according to SSA's Program Operations Manual System (POMS), SSA will assign an original SSN if one is needed for health insurance claims filed on behalf of a deceased child.³ SSA does not reassign an SSN after the numberholder's death.⁴

Before SSA's policy change in November 2002, SSA could issue replacement cards on behalf of deceased individuals. SSA controlled the issuance of these cards by having them sent to the field offices that processed the applications. Field offices were required to record the SSN card request in a security log and deface the card with the

¹ SSA's FY 2004 Performance and Accountability Report, page 31.

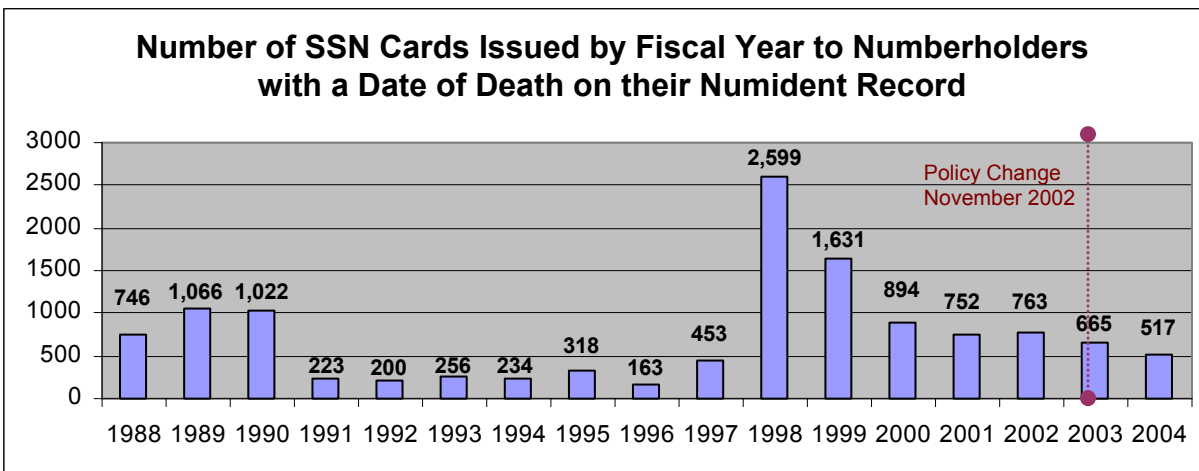
² SSA, POMS, RM 00206.055(A), *SSN Applications on Behalf of Deceased Persons*.

³ Id.

⁴ Social Security Online, History, Frequently Asked Questions at <http://www.ssa.gov/history/hfaq.html>.

word “Deceased” before forwarding the card to the requestor. Effective November 2002, SSA amended its policy and eliminated the provision that allowed the issuance of replacement cards on behalf of deceased individuals.⁵ The amended policy states that SSA can offer to provide verification, such as third-party verification, an SSN verification printout, or instructions on how to obtain a numerical identification (Numident) record; however, a replacement card will not be issued.⁶

We identified 12,082⁷ instances from December 1987 through November 2003 where SSA issued SSN cards although a date of death was recorded in the numberholder’s Numident record. Our review focused primarily on these transactions. In September 2004, we identified another 420 SSN cards issued from December 2003 through August 2004 to identify the total number of cards issued after the policy change in November 2002. We did not select any of these additional cases for detailed review. The chart below summarizes these 12,502 issuances by fiscal year.



Death entries are sometimes posted in error to an individual’s Numident record. If this occurs and the individual requests a replacement SSN card, field office personnel should review the *Application for a Social Security Card* (Form SS-5) and determine the validity of supporting identity documents. If sufficient proof of identity is provided, SSA personnel should remove the death entry, then certify and enter the applicant information into SSA’s Modernized Enumeration System (MES). The applicant information then undergoes numerous automated edits to further validate the information. If the applicant information passes all of these edits, MES issues an SSN card. Appendix B provides the scope and methodology of our review.

⁵ SSA, POMS, RM 00206.055(B)(2), *SSN Applications on Behalf of Deceased Persons* (TN 6 – 11/02).

⁶ Id.

⁷ Thirteen original and 12,069 replacement cards.

RESULTS OF REVIEW

Of the 12,082 cards SSA issued between December 1987 and November 2003 although a date of death was recorded in the numberholder's Numident record, 13 were original SSN cards and 12,069 were replacement cards. Nothing came to our attention to indicate the 13 original cards issued on behalf of deceased individuals were not in compliance with SSA policy. However, we found that SSA did not comply with its policy on controlling or issuing replacement cards when SSA's records indicated the numberholder was deceased. While these issuances represented a very small percentage of the cards processed each year, the risk that even a few cards might be issued to individuals who may intend to use someone else's identity is a matter of increasing concern.

We analyzed trends for the 12,069 replacement cards and reviewed SS-5 documentation for a selected number of the cards. We found SSA continued to issue SSN cards containing the SSNs of individuals who were listed as deceased, even after its policy change in November 2002. We also noted that SSA issued replacement SSN cards to questionable applicants, including some who were issued multiple replacement cards; paid over \$1.6 million in survivor benefits to auxiliaries of apparently living individuals; and accepted questionable proof of identity documents when it processed applications for replacement cards. In these instances, SSA did not correct discrepancies in the Numident record when it had information to indicate its records contained errors.

Although SSA had MES procedures to alert employees of conflicts between application and Numident information, the procedures did not prevent employee error. By promptly correcting erroneous death information or ensuring replacement cards are not issued on deceased individuals' SSNs, SSA can lessen the risk it will enable identity fraud and reduce the likelihood of improper survivor payments.

REPLACEMENT CARDS ISSUED AFTER POLICY CHANGE

In November 2002, SSA amended its policies and procedures to eliminate provisions allowing for the issuance of replacement cards against SSNs of deceased individuals.⁸ Contrary to this policy, SSA continued to issue replacement cards with SSNs of deceased individuals. From December 2002 to August 2004, SSA issued 1,068 replacement cards with SSNs of individuals whose Numident record contained a date of death. We did not perform a detailed review of these 1,068 issuances. However, we did review a random sample of 30 replacement cards issued in FY 2003, including 27 issued after the policy change. In 21 of 27 cases, SSA determined the numberholders were deceased but still issued the replacement cards.

⁸ SSA, POMS, RM 00206.055(B)(2), *SSN Applications on Behalf of Deceased Persons (TN 6 – 11/02)*.

QUESTIONABLE APPLICANTS FOR ASSIGNED SSNs

To determine whether obvious discrepancies existed between information in the applications for replacement SSN cards and information recorded in the Numident's death entries for the 12,069 replacement cards, we compared the first name, last name, and date of birth on the Numident death entry to the Numident replacement card entry.⁹ This comparison identified 537 replacement card issuances where the name and date of birth information provided on the application did not match the information of the deceased person listed in SSA's records. SSA is required to apply basic verification standards to the applicant's name and date of birth when the identifying information provided does not exactly match the Numident record.¹⁰

In 401 of these cases, the applicant's date of birth was more than 6 years different than the date of birth that appeared in the numberholder's Numident death entry. In some cases, the difference in dates of birth exceeded 90 years. Although it appeared the individuals requesting these replacement cards were not the actual numberholders, SSA personnel approved the applications without addressing the discrepancies. Appendix C provides examples of differences in dates of birth for some of the 537 instances in which the replacement card information did not match the Numident death entry. Appendix D summarizes these occurrences by the year of issuance.

MULTIPLE REPLACEMENT CARDS ISSUED AGAINST THE SAME SSN

From the 12,069 replacement cards discussed above, we found SSA approved and issued 2 or more replacement cards to 378 individuals after a date of death was posted on SSA's records for those individuals.

Number of Individuals Issued Multiple Replacement Cards Although a Date of Death was Recorded in The Individual's Numident Record

Replacement Cards per Individual	Individuals
2	307
3	54
4	13
5	4
Total	378

⁹ The Numident replacement card entry reflects information entered from the paper SS-5 applications or data entries made through the MES interviews.

¹⁰ SSA, POMS, RM 00208.013, *How to Verify Numident and Alpha-Index Query Responses*, & RM 00208.015, *Applying the Basic Verification Standards*.

Seventy-one¹¹ of these individuals were issued three or more replacement cards. We requested and reviewed the SS-5 applications for these 71 individuals and determined that 62 had applied¹² for the replacement cards on their own behalf.¹³ The SS-5 applications also indicated that SSA accepted the proofs of identity offered by the applicants. However, the SSA personnel who processed the applications did not remove the death entry from the individual's Numident record.

QUESTIONABLE SURVIVOR BENEFIT PAYMENTS

SSA paid \$1.6 million in survivor benefits to auxiliary beneficiaries for 19 of the 71 individuals who applied for and received 3 or more replacement cards after the death entry was posted on their Numident record. The SS-5 applications indicated that these individuals applied for a replacement card on their own behalf, and SSA field office personnel verified and confirmed their identities. In 15 of the 19 cases, SSA approved the applications and issued replacement cards *at the same time* survivor benefits were being paid to the applicant's auxiliary beneficiaries. In these 15 cases, SSA paid nearly \$720,000 in benefits after it verified the identity of the allegedly deceased numberholder. In all 19 cases, either the survivor payments were improper and should have been terminated when the replacement card applications were processed or SSA mistakenly issued SSN cards to someone other than the proper numberholder.

For example, one allegedly deceased individual had three children who received a total of \$151,480 in survivor benefit payments from December 1995 through December 2004. Two of these children (12-year-old twins) received more than \$8,600 each in annual survivor benefits—which will continue through 2010. However, in January 1999, September 2000, April 2003, and June 2004, SSA approved applications for replacement cards submitted by someone who claimed to be the allegedly deceased numberholder.

We did not independently determine whether any of these individuals were actually alive because SSA field offices had already documented multiple verifications of identity for each of these individuals. The example provided above is the only instance we found where survivor benefits were still being paid at the time of our review. We referred this case to our Office of Investigations. Appendix E illustrates the survivor payments made to auxiliaries of the 19 allegedly deceased individuals, the years benefits were paid, and the years in which replacement cards were issued.

¹¹ This includes 5 replacement card issuances from the 537 discussed in the *Questionable Applicants for Assigned SSNs* section of this report.

¹² The applications for the remaining nine individuals were either not provided by SSA, or the "Your Relationship" block was not checked or was completed by a third party.

¹³ We requested and reviewed SS-5s for 101 individuals, including 71 individuals who had been issued 3 or more replacement cards after the date of death was posted to their Numident record and 30 randomly selected individuals who were issued replacement cards in FY 2003. In total, we requested 265 completed SS-5s for 101 individuals. SSA provided copies for 233 and could not locate 32.

SSA ACCEPTED QUESTIONABLE PROOF OF IDENTITY

Before issuing replacement cards, SSA requires that applicants confirm their identity by submitting one or more documents that show the person's name and provide biographical information (age, date of birth, or parent's name).¹⁴ The reviewer can compare the document with data on the application and/or the applicant's physical characteristics (for example, hair or eye color).¹⁵ Acceptable forms of identity documents include current driver's license, employee identification card, military identification, or school identification card.

In addition to the SS-5s we requested for the 71 individuals who were issued 3 or more replacement cards, we requested and reviewed SS-5 applications for 30 randomly selected individuals who were issued replacement cards in FY 2003. We reviewed 233 SS-5 applications for these 101 individuals. We found that SSA employees approved issuance of many of these cards after accepting documentation that did not appear to sufficiently establish the identity of the individual who requested the card.

- In 23 instances, either no evidence of identity was documented on the application or the evidence documented was items that, according to POMS, "...should not be accepted as adequate by themselves to establish identity for SSA purposes."¹⁶ Documentation SSA accepted as proof of identity for these applications included library cards, voter registration cards, hunting licenses, and utility bills.
- In 72 instances, SSA approved issuance of replacement cards upon acceptance of questionable documentation, such as pay stubs, third-party letters, certain expired driver's licenses, telephone cards, and baptismal certificates.

MES CONTROLS

SSA's MES has controls to alert employees when requests for replacement cards may conflict with information in its records. When a conflict occurs, MES sends a system-generated feedback message to alert employees of the discrepancy in the applicant's information.¹⁷ The feedback messages for death discrepancies require that a manager enter his or her personal identification number for resolution.¹⁸ However, the employee can still process and issue the replacement card without clearing the death entry from the Numident record. In such cases, MES does not regenerate a feedback message to alert the field office to resolve the incorrect information. The continued issuance of replacement cards after November 2002—although the individual is listed as deceased—reflects a continuing vulnerability with SSA's process.

¹⁴ SSA, POMS, RM 00203.200(F), *Evidence of Identity for an SSN Card*.

¹⁵ *Id.*

¹⁶ SSA, POMS, RM 00203.200(H), *Evidence of Identity for an SSN Card*.

¹⁷ Modernized Systems Operations Manual, Chapter 303, *MES Enumeration Feedback Messages*.

¹⁸ Modernized Systems Operations Manual, Chapter 303-A, *Resolving Enumeration Feedback Messages - Tasks 10 & 12*.

CONCLUSION AND RECOMMENDATIONS

SSA did not comply with its policy concerning the issuance of replacement cards when its records indicated the individual was deceased. While the number of such cards issued is small in relation to the total number of SSN card applications processed each year, the risk of issuing cards to the wrong individuals is magnified by the potential for identity fraud. SSA amended its policy to prohibit the issuance of replacement cards for deceased individuals, but cards were still issued after the November 2002 policy change. In addition, SSA issued replacement SSN cards to questionable applicants, paid survivor benefits to auxiliaries of apparently living individuals, and accepted questionable identity documents. SSA can minimize the risk that it serves as an enabler for identity fraud, as well as reduce the likelihood of improper payments, by ensuring replacement cards are not issued on deceased numberholders' accounts, and by promptly resolving discrepancies between information provided by applicants for replacement cards and information appearing in SSA's records.

We recommend that SSA:

1. Ensure compliance with SSA policy concerning the issuance of replacement SSN cards for individuals whose record indicates they are deceased.
2. Determine whether information needs to be corrected in the individual records associated with the questionable issuances identified within the report. SSA should refer any potentially fraudulent cases to the Office of the Inspector General for investigation.
3. Determine the appropriateness of current survivor payments being made under the individual's account discussed in the report.
4. Review its procedures for paying survivor's payments to auxiliaries when evidence indicates that the numberholder is not deceased.

AGENCY COMMENTS

SSA agreed with our recommendations and provided technical comments that we incorporated into the final report. See Appendix F for the text of SSA's comments.



Patrick P. O'Carroll, Jr.

Appendices

APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Comparison of Death Entry Date of Birth with Replacement Card Entry Date of Birth

APPENDIX D – Replacement Social Security Number Cards Issued by Fiscal Year where Name and Date of Birth Information Provided was Inconsistent with the Numberholder's Numident Record

APPENDIX E – Survivor Benefits to Auxiliaries of Numberholders Who Applied for Replacement Cards After Recorded Date of Death

APPENDIX F – Agency Comments

APPENDIX G – OIG Contacts and Staff Acknowledgments

Acronyms

FY	Fiscal Year
MES	Modernized Enumeration System
Numident	Numerical Identification
POMS	Program Operations Manual System
SSA	Social Security Administration
SSN	Social Security Number

Forms

SS-5	<i>Application for a Social Security Card</i>
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Scope and Methodology

To accomplish our objective, we:

- Reviewed the Social Security Administration's (SSA) policies and procedures related to the Modernized Enumeration System (MES) and prior Office of the Inspector General and Government Accountability Office reports pertaining to enumeration.
- Visited an SSA field office to view the enumeration process and interview field office staff regarding procedures used in issuing a Social Security number (SSN) card.
- Extracted all 12,082 cases from SSA's numerical identification (Numident) record where a date of death was posted to an individual's record and an SSN card was issued¹ after the posted date of death. Of these, 13 were issued as original cards, and 12,069 were issued as replacement cards. We examined these issuances to determine
 - whether there were notable differences between information in the application and information in SSA's records and
 - the number of times replacement cards were issued under the same SSN.
- Performed a similar data extract in September 2004 for the period December 2003 through August 2004. This extract identified another 420 replacement card issuances. We did not select these cases for testing. However, we did consider these transactions when identifying the number of cases since the November 2002 policy change prohibiting issuance of replacement cards on behalf of deceased individuals.
- Determined whether obvious discrepancies existed between information in the applications for replacement SSN cards and information recorded in the Numident's death entries. We compared the first name, last name, and date of birth on the Numident death entry to the Numident replacement card entry for the 12,069 replacement cards issued from December 1987 through November 2003.²

¹ From December 1987 through November 2003.

² The Numident replacement card entry reflects information entered from the paper SS-5 applications, or data entries made through the MES interviews.

- Requested 265 *Applications for a Social Security Card* (Form SS-5) from SSA's Office of Central Operations, Center for Material Resources for 101 individuals. SSA provided, and we reviewed, 233 of the 265 SS-5s for 101 individuals including:
 - 71 individuals who had been issued 3 or more replacement cards after the date of death posted to their Numident record, and
 - 30 randomly selected individuals who were issued replacement cards in Fiscal Year 2003.
- Retrieved and reviewed the Master Beneficiary Records, Supplemental Security Income Records, Numident Records and Earnings Records for our sample items (if applicable).

We conducted our audit between July and October 2004 at SSA's Regional Office in Dallas, Texas. The entity audited was the Office of the Deputy Commissioner for Operations. We conducted this audit in accordance with generally accepted government auditing standards.

Comparison of Death Entry Date of Birth with Replacement Card Entry Date of Birth

Death Entry Date of Birth	Replacement Card Entry Date of Birth	Difference in Years ¹
September 6, 1890	May 10, 1987	96.7
November 8, 1891	March 3, 1986	94.4
December 10, 1876	July 29, 1970	93.7
July 22, 1900	October 10, 1992	92.3
August 20, 1891	August 18, 1977	86.1
October 31, 1902	October 26, 1987	85.0
May 23, 1880	May 6, 1965	85.0
August 7, 1891	February 10, 1970	78.6
November 7, 1893	October 1, 1970	76.9
...
April 17, 1905	May 21, 1912	7.1
November 4, 1913	December 5, 1906	6.9
April 13, 1927	February 5, 1934	6.8
October 3, 1919	December 12, 1912	6.8
July 20, 1899	April 20, 1906	6.8
December 12, 1897	September 7, 1904	6.7
November 9, 1903	March 28, 1897	6.6
October 14, 1963	March 3, 1957	6.6
March 8, 1975	September 24, 1968	6.5

¹ We identified 401 instances where differences in dates of birth between the replacement cards application and the Numident record exceeded 6 years. Examples provided above include the nine cases with the greatest difference as well as the nine cases with the least difference.

Replacement Social Security Number Cards Issued by Fiscal Year where Name and Date of Birth Information Provided was Inconsistent with the Numberholder's Numident Record

Fiscal Year	Number of Cards Issued
1988	102
1989	131
1990	116
1991	41
1992	23
1993	17
1994	29
1995	15
1996	11
1997	8
1998	13
1999	9
2000	1
2001	6
2002	5
2003	9
2004	1
Total	537

Survivor Benefits to Auxiliaries of Numberholders Who Applied for Replacement Cards After Recorded Date of Death

Replacement Cards Issued After Death	Years Replacement Cards Issued	Years SSA Paid Benefits to Survivors	Number of Auxiliaries	Total Amount of Survivor Benefits Paid
3	88, 89, 90	83-97*	5	\$ 103,324
3	89, 90, 93	74-91*	4	136,636
3	89(2), 93	86-99*	1	22,556
3	89, 93(2)	79-82	1	8,075
4	88, 89, 90, 94	87-96*±	1	41,936
3	88, 89, 90	86-99*	1	70,450
3	90, 96, 02	73-90	8	63,413
4	89, 90(2), 99	78-95*	3	98,919
3	90(3)	84-02*	2	38,204
3	87, 89, 91	91	1	3,954
4	88(3), 90	82-98*	3	103,139
3	89, 90, 98	75-93*	3	109,218
5	88, 89, 90, 91(2)	78-90*	3	85,296
3	89, 90, 94	78-93*	2	98,666
3	89, 90, 92	81-99*±	2	105,170
4	88, 93, 98(2)	75-86±	4	116,025
3	88, 89, 94	83-98*±	4	189,819
3	90(3)	85-01*	1	56,095
4	99, 00, 03, 04	95-04*	3	151,480
				\$1,602,375

* SSA continued paying survivor benefits even after approving replacement card requests from the allegedly deceased individual.

± Individual claiming to be this numberholder is in prison.

Agency Comments



SOCIAL SECURITY

MEMORANDUM

April 4, 2005

Refer To: S1J-3

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

From: Larry W. Dye /s/
Chief of Staff

Subject: Office of the Inspector General (OIG) Draft Report "Review of Social Security Number Cards Issued After Death" (A-06-03-13078)--INFORMATION

We appreciate OIG's efforts in conducting this review. Our comments on the draft report recommendations are attached.

Please let me know if you have any questions. Staff inquiries may be directed to Candace Skurnik, Director, Audit Management and Liaison Staff, at extension 54636.

Attachment:
SSA Response

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT
"REVIEW OF SOCIAL SECURITY NUMBER CARDS ISSUED AFTER DEATH"
(A-06-03-13078)**

Thank you for the opportunity to review and comment on the draft report contents and recommendations. We agree that the prevention and detection of Social Security number (SSN) misuse is vital in combating identity fraud. The Social Security Administration (SSA) has taken several steps to improve the integrity of the enumeration process that include:

- Creating an interface between Title II and Title XVI claims and the Numident record to alert the field office (FO) if a death is posted to the Numident. Management clearance is needed to override the alert and permit adjudication of the claim.
- Creating an enumeration message (EM) that is sent to interrupt the processing of an SS-5 application when death data is present on the Numident. The FO is instructed to review SSA records and management clearance is required to clear the application.

We will continue to make every effort to address policies and procedures that are not being followed and address ways to reduce the risk of paying benefits improperly. We are currently working on changes to the enumeration system, and will determine if it is feasible to include in those changes a process that prevents issuance of an SSN replacement card if death data is present on the Numident.

Finally, it should be noted that of the 537 cases identified in Appendix D where replacement cards were issued in spite of inconsistencies in the name and date of birth, only 15 cases occurred in 2002 after we changed our policy for issuing SSN replacement cards on behalf of deceased numberholders. This reflects a significant improvement in our performance in reducing the risk of potential identity fraud.

Below are our responses to the recommendations as well as technical comments to enhance the accuracy of the report.

Recommendation 1

SSA should ensure compliance with policy concerning the issuance of replacement SSN cards for individuals whose record indicates they are deceased.

Response

We agree. We currently have policies and procedures in place that provide an alert (EM 16 – Investigate Message) to interrupt the issuance of replacement cards to deceased individuals when the record of death has been posted to SSA records. Prior to implementation of the EM 16 alert, there were no systems-generated alerts. To address the current policy compliance issue, we will issue an Administrative Message (AM) with reminders to our FO

employees on the procedures for issuing SSN cards when the numberholder is deceased. We expect to issue this AM in April 2005.

We will also include within a future Enumeration Essentials Interactive Video Training broadcast refresher training on FO issuance of replacement SSN cards for individuals whose Numident records indicate they are deceased. The next broadcast is tentatively scheduled for Spring/Summer 2005.

Finally, as noted above, we are currently exploring plans for redesigning the Modernized Enumeration System to build in additional safeguards to prevent the processing of an SSN replacement card transaction if a death indicator is present on the Numident.

Recommendation 2

SSA should determine whether information needs to be corrected in the individual records associated with the questionable issuances identified within the report. SSA should refer any potentially fraudulent cases to the OIG for investigation.

Response

We agree. We will investigate the cases identified in the report and make referrals to OIG where it is appropriate.

Recommendation 3

SSA should determine the appropriateness of current survivor payments being made under the individual's account discussed in the report.

Response

We agree. As with recommendation number 2, we will also review the cases identified to determine if current survivor benefit payments should have been paid. It should be noted that the case cited in the report has been forwarded to OIG for investigation.

Recommendation 4

SSA should review its procedures for paying survivors payments to auxiliaries when evidence indicates that the numberholder is not deceased.

Response

We agree. We will review our procedures to ensure that discrepancies are promptly resolved when information provided by applicants for replacement cards and information in our records conflict.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Paul Davila, Director, (214) 767-6317

Ron Gunia, Audit Manager, (214) 767-6620

Acknowledgments

In addition to those named above:

Joshua Campos, Auditor

Brennan Kraje, Statistician

Kimberly Beauchamp, Writer-Editor

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