OFFICE OF
THE INSPECTOR GENERAL

SOCIAL SECURITY ADMINISTRATION

ORIGINAL SOCIAL SECURITY
NUMBERS ASSIGNED TO U.S. CITIZENS
AGE 12 OR OLDER

June 2007 **A-08-07-17043**

AUDIT REPORT

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SOCIAL SECURITY

MEMORANDUM

Date: June 18, 2007 Refer To:

To: The Commissioner

From: Inspector General

Subject: Original Social Security Numbers Assigned to U.S. Citizens Age 12 or Older (A-08-07-17043)

OBJECTIVE

Our objective was to assess the Social Security Administration's (SSA) process for assigning original Social Security numbers (SSN) to U.S. citizens age 12 or older.

BACKGROUND

In the United States, citizens usually receive an SSN before age 12. Because U.S. tax regulations require that parents provide a child's SSN—or an Individual Taxpayer Identification Number if he or she does not qualify for an SSN—for the child to qualify for an exemption or child tax credit, most parents have a financial incentive to obtain a child's SSN before age 1.[1] Additionally, although not legislatively required, throughout U.S. society, parents are asked for their children's SSNs to receive other benefits and services. For example, many medical providers and schools require a child's SSN for treatment and enrollment, respectively. However, some U.S. citizens do not obtain an SSN until age 12 or older because they have lived outside the United States since birth or have religious beliefs that prevented them from doing so earlier in life. Given the rarity of SSN applications for older U.S. citizens, SSA has established special requirements for processing these requests.

When a U.S. citizen age 12 or older requests an original SSN, he or she must complete, sign, and submit an *Application for a Social Security Card* (Form SS-5) to an SSA field office.[2] Before approving the SSN application, SSA requires that each of these applicants provide acceptable documentary evidence of age, identity, and U.S. citizenship.[3] In addition, SSA conducts a mandatory in-person interview with original SSN applicants age 12 or older to ensure the validity of the request. The

[1] See 26 U.S.C. § 6109(a) and 26 U.S.C. § 24(e).

[2] SSA Program Operations Manual System (POMS), section RM 00202.001 A.

[3] POMS, section RM 00203.020(2).

interview process is designed to prevent SSA from assigning an SSN to an individual who already has one and to preclude an individual from assuming a false identity.[4] Before SSA assigns an SSN to these applicants, a supervisor must approve the application and enter his or her personal identification number in SSA's Modernized Enumeration System (MES).[5]

Since March 1, 2005, SSA has required that field office personnel processing SSN applications use the Agency's "SS-5 Assistant," a Microsoft Access-based application. The SS-5 Assistant works with MES and does not affect SSA's enumeration policies and procedures. Overall, the SS-5 Assistant is intended to increase control over the SSN application process, improve the quality of data used to assign an SSN, and enable management to better control this workload. This program provides field office personnel processing SSN applications structured interview questions and requires certain data to complete the application process. The SS-5 Assistant also prompts field office personnel to provide additional applicant information when processing an original SSN application for a U.S. citizen age 12 or older.

To accomplish our objective, we reviewed SSA's policies and procedures for assigning an original SSN to U.S. citizens age 12 or older. In addition, we visited four SSA field offices to gain an understanding of the assignment process. We also identified a population of 23,924 records for which SSA assigned original SSNs to individuals coded as U.S. citizens and age 12 or older in Fiscal Year (FY) 2005. From our population, we randomly selected a sample of 275 records to determine whether SSA personnel complied with Agency policies and procedures when processing these applications. Our sample of 275 records contained 137 foreign-born and 127 U.S.-born individuals whom SSA coded as U.S. citizens. We did not analyze 11 sample records because we subsequently determined SSA did not assign these individuals an original SSN during our audit period.[6]

Appendix B includes a detailed description of our scope and methodology, and Appendix C includes our sample appraisals.

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[4] POMS, section RM 00202.055.

[5] POMS, section RM 00202.055(D)(5). SSA field office personnel use MES to process applications for SSNs by recording evidence reviewed and accepted from the applicants.

[6] SSA assigned these individuals a "new" SSN (not an original SSN) during the audit period. These "new" SSNs were assigned because of issues related to (1) religious/cultural objections; (2) harassment, abuse, or life endangerment; or (3) SSN misuse and disadvantage.

RESULTS OF REVIEW

SSA recognized vulnerabilities associated with assigning original SSNs to U.S. citizens age 12 or older and therefore established specialized procedures for these applications. However, these procedures can only be effective if SSA personnel comply with the requirements. Of the 275 original SSN applications we reviewed, 89 (32 percent) contained at least 1 compliance error.[7] Based on the errors we identified, we estimate SSA personnel did not fully comply with SSA's procedures when assigning 7,743 original SSNs to U.S. citizens age 12 or older in FY 2005. Additionally, we identified weaknesses in existing controls we believe SSA should address to further reduce vulnerabilities associated with the assignment of SSNs to individuals age 12 or older.

As shown in Table 1, the most common occurrences of noncompliance included SSA field office personnel (1) incorrectly coding the citizenship status of SSN applicants, (2) not recording why U.S.-born individuals in our sample had not been assigned an SSN, and (3) not requiring and/or documenting adequate evidence to process the SSN applications.

Table 1: Original SSN Applications with Compliance Errors

Type of Compliance Error	Number of Occurrences
Noncitizens Coded as U.S. Citizens	36
Reason for SSN Assignment Not Recorded	45
Insufficient Evidence Required/Documented	10
Total Number of Noncompliance Errors	91
Total Number of Sampled SSNs with at Least One Error	89
Percent of Sampled SSNs with at Least One Error	32

Additionally, we identified an area where SSA could improve the integrity of the SSN assignment process by requiring that field office personnel verify all *Report of Birth Abroad* documents submitted—as the Agency does with other U.S. birth registration documents.

Some Field Offices Incorrectly Coded Noncitizens as U.S. Citizens

SSA policy requires that all applicants for original SSN cards who allege they are U.S. citizens submit documentary evidence to prove citizenship.[8] Acceptable evidence includes a birth certificate showing a place of birth in the United States, a U.S. passport, a *Consular Report of Birth Abroad of a Citizen of the United States of America* (Form

[7] Two of the SSNs tested had more than one compliance error.

[8] POMS, section RM 00203.300(A)(1).

FS-240), a *Certificate of Naturalization* (Form N-550), or adoption finalization papers.[9] However, in 36 (13 percent) of the 275 SSNs reviewed, SSA personnel incorrectly coded noncitizens as U.S. citizens when processing the applications. These 36 individuals were foreign-born but were not U.S. citizens. As such, we estimate SSA incorrectly coded about 3,132 noncitizens as U.S. citizens and assigned them an original SSN in FY 2005.

In all cases, the documentation we reviewed indicated either these individuals were not U.S. citizens or SSA did not sufficiently document U.S. citizenship. For example, field office personnel entered work authorization forms, arrival and departure documents, and alien numbers in MES or SS-5 Assistant that did not support U.S. citizenship. Furthermore, our review of the Department of Homeland Security's (DHS) Systematic Alien Verification for Entitlements (SAVE)[10] program confirmed that almost half of the noncitizens were either a lawfully admitted permanent resident, refugee, temporary worker, or temporary visitor for business. SAVE could not provide immigrant classifications for the remaining miscoded numberholders. Based on a review of our findings, SSA confirmed these individuals should have been classified as noncitizens.

Our recent audit work indicates errors in recording the citizenship status of SSN applicants is a recurring problem. In December 2006, we issued a Congressional Response Report, *Accuracy of the Social Security Administration's Numident File* (A-08-06-26100), in which we reported that about 8 percent of all foreign-born U.S. citizen Numident records tested were misclassified—and the numberholders were not actually U.S. citizens. Additionally, in August 2004, we issued a report, *Compliance with Policies and Procedures When Processing Noncitizen Social Security Number Applications at Foreign Service Posts* (A-08-04-14060), in which we identified cases where SSA incorrectly coded U.S. citizens as noncitizens.

We believe incorrectly coding noncitizens as U.S. citizens diminishes the integrity of SSA records and could provide unintentional benefits to those applicants whose citizenship status was miscoded. For example, the Employment Eligibility Verification System (EEVS), formerly known as the Basic Pilot, is a DHS program supported by SSA and provides employers a tool for determining whether newly hired employees reported the correct name, SSN, and date of birth and are authorized to work in the United States. If noncitizens are incorrectly classified as U.S. citizens in SSA records (and allege U.S. citizenship to an employer), EEVS would not require that DHS determine their immigration and work status before confirming employment eligibility. A mandatory employment eligibility system has been proposed in both House and Senate bills for all newly hired U.S. employees. If such legislation is enacted, the accuracy and

[9] POMS, section RM 00203.310(B).

[10] DHS provides and maintains the SAVE program for benefit-granting agencies, such as SSA, to verify that alien applicants meet immigration status eligibility requirements. To properly assign SSNs to aliens, SSA uses SAVE to confirm the authenticity of immigration documents submitted to support the SSN card application and to verify the immigration status and work authorization of applicants.

integrity of SSA's records regarding the numberholders' citizenship status would be essential to ensuring correct employment eligibility feedback to employers.

SSA has taken steps to assist field office personnel in properly documenting citizenship status by modifying SS-5 Assistant to contain a stand-alone screen for foreign-born applicants who allege U.S. citizenship.[11] SSA representatives told us they believed this modification prevents field office personnel from improperly coding applicants' citizenship status. Because improperly coding the citizenship status of SSN applicants has been a recurring problem and none of the noncitizens in our sample were processed using the stand-alone screen in SS-5 Assistant, we will continue to monitor this issue in future audit work.

Field Offices Did Not Routinely Document Why U.S.-Born Applicants Had Not Been Assigned an SSN

SSA policy requires that field office personnel include in the "Evidence Submitted" block of Form SS-5 and in the "Additional Remarks" field in SS-5 Assistant, why *U.S.-born* applicants age 12 or older had not previously been assigned an SSN.[12] However, in 45 (16 percent) of the 275 SSNs selected for review, SSA personnel did not comply with this procedure. As such, we estimate SSA did not document why about 3,915 applicants had not been assigned an SSN. Of the 127 U.S.-born numberholders tested in our sample, SSA did not document a reason for 35 percent of these individuals.[13]

Some field office personnel with whom we spoke were not aware that SSA policy requires that they document why U.S.-born applicants age 12 or older had not previously been assigned an SSN. In addition, although SS-5 Assistant can generate an alert to prompt field office personnel to enter a reason in the "Additional Remarks" field, it will only do so if no other text has been entered in that field.[14] We believe SSA would benefit from adding a separate "Reason" field to SS-5 Assistant, which would prompt personnel to enter the required information. In addition, we believe having a drop-down menu in the "Reason" field with common reasons why a U.S.-born applicant age 12 or older had not been assigned an SSN could better assist field office personnel. By documenting a reason, SSA is taking an additional step to ensure the applicant is not trying to obtain another SSN or trying to assume a false identity.

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[11] Eight of the 36 noncitizens in our sample were processed using SS-5 Assistant. These eight were processed before the addition of the stand-alone screen for foreign-born applicants alleging U.S. citizenship.

[12] POMS, section RM 00202.055(D)(4) and SS-5 Assistant Release 2 User Guide.

[13] Of the 45 instances we identified where SSA did not document why U.S.-born applicants had not been assigned an SSN, field office personnel processed 42 applications through MES and 3 in SS-5 Assistant.

[14] SS-5 Assistant Release 2 User Guide.

SSA policy does not require that field office personnel document why *foreign-born* U.S. citizens age 12 or older had not been assigned an original SSN. While we acknowledge there are legitimate reasons why a foreign-born U.S. citizen may not have obtained an SSN by age 12, we believe SSA should hold these individuals to the same standard as U.S.-born applicants. As such, we believe SSA could further reduce the potential for improper SSN attainment by requiring that field office personnel enter a reason for foreign-born U.S. citizens age 12 or older.

Field Offices Did Not Always Require and/or Document Adequate Evidence to Process Original SSN Applications

SSA policy requires that applicants for an original SSN submit at least two documents as evidence of age, identity, and U.S. citizenship.[15] Furthermore, the identity document must be current.[16] Finally, SSA personnel are required to document in MES/SS-5 Assistant sufficient descriptions of evidence presented with the SSN applications. However, we identified 10 (3.6 percent) instances from the 275 SSNs tested in which field office personnel did not always require and/or document adequate evidence to process original SSN applications for U.S. citizens age 12 or older.[17] As such, we estimate SSA did not always document adequate evidence to process about 870 original SSN applications during FY 2005.

We identified instances in which either applicants submitted only one document as evidence of age, identity, and citizenship or the identity evidence provided did not meet SSA policy requirements.[18] For example, we identified one applicant who submitted only one document, a U.S. passport, as evidence. While a U.S. passport is acceptable evidence of age and citizenship, another document is needed to substantiate identity. We believe it is imperative for field office personnel to properly document evidence of age, identity, and citizenship to prevent the improper assignment of SSNs. SSA has taken steps to assist field office personnel in doing so by implementing SS-5 Assistant, which requires that field office personnel enter appropriate evidence of age, identity, and citizenship before they can process an SSN application. While SS-5 Assistant should assist field office personnel in properly documenting the required evidence, we believe SSA should reemphasize to field office personnel the importance of requiring and/or documenting adequate evidence when processing SSN applications for U.S. citizens age 12 or older and take corrective action to address performance problems or training needs when Agency personnel do not comply with this requirement.

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[15] POMS, section RM 00203.020(2). One document, such as a U.S. birth certificate, can substantiate age and citizenship, but a separate document must substantiate identity. A birth certificate cannot substantiate identity. Therefore, a total of two documents must be presented as evidence.

[16] POMS, section RM 00203.200(C)(3).

[17] Field office personnel processed 2 of the 10 applications using SS-5 Assistant.

[18] We acknowledge the possibility that applicants could have presented the appropriate documents, but field office personnel failed to document all of the evidence presented.

Field Offices Did Not Routinely Verify *Reports of Birth Abroad*

SSA policy requires that field office personnel verify the authenticity of birth records of U.S.-born citizens age 12 or older who are applying for an original SSN.[19] However, policy does not require that personnel verify the authenticity of *Reports of Birth Abroad* (Forms FS-240, FS-545, and DS-1350)[20] unless they believe the document is not authentic.[21] We believe SSA should hold U.S. citizens born abroad to the same standard as individuals born in the United States.

We believe verifying *Reports of Birth Abroad* with the Department of State could reduce the potential that some noncitizens, claiming to be U.S. citizens born abroad, could submit counterfeit documents to help them obtain an original SSN. As such, we believe SSA should routinely verify the authenticity of birth records of U.S. citizens born abroad. Field office personnel with whom we spoke agreed that requiring such verification would help prevent SSA from assigning an SSN to an individual who already has an SSN and to preclude an individual from assuming a false identity.

CONCLUSION AND RECOMMENDATIONS

Despite SSA's controls to prevent improper SSN assignment to individuals age 12 or older, it is at-risk to such activity when field office personnel do not fully comply with policies and procedures. We recognize SSA's efforts cannot eliminate the potential that some individuals may inappropriately acquire and misuse an SSN. Nonetheless, we believe SSA has a stewardship responsibility to ensure compliance with all policies and procedures. We believe SSA would benefit by taking additional steps to strengthen SSN integrity and reduce its risk of exposure to improper SSN card issuance and misuse and identity theft.

Accordingly, we recommend that SSA:

1. Correctly code SSA records for the 36 noncitizens who field office personnel incorrectly classified as U.S. citizens. We will provide further details regarding these individuals under separate cover.

2. Consider adding a "Reason" field in SS-5 Assistant to document why U.S. citizens age 12 or older had not applied for an SSN. Specifically, consider adding a drop-down menu with examples of legitimate reasons as to why U.S. citizens age 12 or older had not been assigned an original SSN to the "Reason" field in SS-5 Assistant.

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[19] POMS, section RM 00202.055(D)(3).

[20] The Department of State issues *Reports of Birth Abroad* to individuals who were born outside the United States and acquired U.S. citizenship at birth.

[21] POMS, section RM 00203.750(H).

3. Consider requiring that field office personnel document why foreign-born U.S. citizens age 12 or older had not been assigned an SSN.

4. Reemphasize to field office personnel the importance of requiring and/or documenting adequate evidence when processing SSN applications for U.S. citizens age 12 or older and take corrective action to address performance problems or training needs when Agency personnel do not comply with this requirement.

5. Consider coordinating with the Department of State to verify all *Reports of Birth Abroad.*

AGENCY COMMENTS AND OIG RESPONSE

SSA agreed or agreed in principle with our recommendations. We believe SSA's planned actions adequately address our concerns. The full text of SSA's comments is included in Appendix D.

Patrick P. O'Carroll, Jr.

Appendices

Acronyms

DHS	Department of Homeland Security
EEVS	Employment Eligibility Verification System
FY	Fiscal Year
MES	Modernized Enumeration System
POMS	Program Operations Manual System
SAVE	Systematic Alien Verification for Entitlements
SSA	Social Security Administration
SSN	Social Security Number

Scope and Methodology

To accomplish our objective, we

- reviewed pertinent sections of the Social Security Administration's (SSA) policies and procedures;
- reviewed prior audit reports;
- obtained a data extract of 23,924 original Social Security numbers (SSN) assigned to U.S. citizens age 12 or older during Fiscal Year 2005;
- randomly selected a sample of 275 records from the data extract;[1]
- reviewed Form SS-5s, *Application for a Social Security Card*, for the sample items;
- reviewed the Numidents for the sample items;
- verified the U.S.-born births with State Bureaus of Vital Statistics;
- verified the *Reports of Birth Abroad* with the Department of State; and
- visited four field offices in Maryland, New York, and Texas. During our site visits, we interviewed staff to determine their procedures for assigning U.S. citizens age 12 or older an original SSN.

The SSA entity audited was the Office of the Deputy Commissioner for Operations. Our review of internal controls was limited to SSA's policies and procedures for assigning original SSNs to U.S. citizens age 12 or older. We conducted our work from June through December 2006 in accordance with generally accepted government auditing standards.

[1] Our sample of 275 records contained 137 foreign-born and 127 U.S.-born individuals age 12 or older who were assigned an original SSN during FY 2005. We did not analyze 11 sample records because we subsequently determined that SSA did not assign these individuals an original SSN during the audit period.

Sample Appraisal

Table 1: Sample Results and Projection Where the Social Security Administration Did Not Comply With Policies and Procedures When Processing Original Social Security Number Applications for U.S. Citizens Age 12 or Older During Fiscal Year 2005

SAMPLE ATTRIBUTE APPRAISAL	
Total Population of Original Social Security Numbers (SSN) Assigned to U.S. Citizens Age 12 or Older During Fiscal Year (FY) 2005	23,924
Sample Size	275
Attribute Projection	
Number of Instances in Sample Where the Social Security Administration (SSA) Did Not Comply With Policies and Procedures When Processing Original SSN Applications for U.S. Citizens Age 12 or Older During FY 2005	89
Estimate of Instances in Population Where SSA Did Not Comply With Policies and Procedures	7,743
Projection—Lower Limit	6,634
Projection—Upper Limit	8,920
Projections made at the 90-percent confidence level.	

Table 2: Sample Results and Projection of Compliance Errors Identified

SAMPLE ATTRIBUTE APPRAISAL	
Total Population of Original SSNs Assigned to U.S. Citizens Age 12 or Older During FY 2005	23,924
Sample Size	275
Attribute Projections	
Number of Instances in Sample Where SSA Incorrectly Coded Noncitizens as U.S. Citizens During FY 2005	36
Estimate of Instances in Population Where SSA Incorrectly Coded Noncitizens as U.S. Citizens During FY 2005	**3,132**
Projection—Lower Limit	2,367
Projection—Upper Limit	4,042
Attribute Projections	
Number of Instances in Sample Where SSA Did Not Document Why Applicants Had Not Been Assigned an SSN During FY 2005	45
Estimate of Instances in Population Where SSA Did Not Document Why Applicants Had Not Been Assigned an SSN During FY 2005	**3,915**
Projection—Lower Limit	3,066
Projection—Upper Limit	4,894
Attribute Projections	
Number of Instances in Sample Where SSA Did Not Require and/or Document Adequate Evidence to Process Original SSN Applications During FY 2005	10
Estimate of Instances in Population Where SSA Did Not Require and/or Document Adequate Evidence to Process Original SSN Applications During FY 2005	**870**
Projection—Lower Limit	477
Projection—Upper Limit	1,453
Projections made at the 90-percent confidence level.	

Agency Comments

SOCIAL SECURITY

MEMORANDUM

Date: June 8, 2007 Refer 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, "Original Social Security Numbers Assigned to United States Citizens Age 12 or Older" (A-08-07-17043)--INFORMATION

We appreciate OIG's efforts in conducting this review. Our comments on the draft report's content and recommendations 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 410 965-4636.

Attachment:
SSA Response

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "ORIGINAL SOCIAL SECURITY NUMBERS ASSIGNED TO UNITED STATES CITIZENS AGE 12 OR OLDER" A-08-07-17043

Thank you for the opportunity to review and comment on the draft report findings and recommendations. We agree that being in compliance with all enumeration policies and procedures will strengthen the integrity of the Social Security number (SSN) and improve our stewardship responsibilities. We appreciate the reports acknowledgement of our efforts to establish specialized procedures for these applicants. We are also encouraged that the report found that the implementation of the SS-5 Assistant is helping to ensure enumeration policies are followed. SSA plans to further enhance our enumeration systems that include the replacement of the SS-5 Assistant with a Modernized Enumeration System (MES) redesign, now known as Social Security Number Application Process (SSNAP) in late 2008. The enhancements currently being considered will address many of the issues identified in this report.

Because the process for assigning original SSNs to United States (U.S.) citizens age 12 or older changed during the course of the audit we are concerned that this audit does not represent the true results received when personnel process an original SSN application. Specifically, the cases included in this sample were from SSN's issued during fiscal year (FY) 2005. Since Field Office (FO) personnel were not mandated to use the SS-5 Assistant until March 1, 2005, we believe that the randomly sampled records should have been from applications submitted after this date.

Our responses to the specific recommendations as well as some technical comments are provided below.

Recommendation 1

The Social Security Administration (SSA) should correctly code SSA records for the 36 noncitizens who field office personnel incorrectly classified as U.S. citizens. We will provide further details regarding these individuals under separate cover.

Response

We agree. Corrective action will be taken upon receipt of details from OIG.

Recommendation 2

SSA should consider adding a "Reason" field in SS-5 Assistant to document why U.S. citizens age 12 or older had not applied for an SSN. Specifically, consider adding a drop-down menu with examples of legitimate reasons as to why U.S. citizens age 12 or older had not been assigned an original SSN to the "Reason" field in SS-5 Assistant.

Response

We agree in principle with this recommendation. However, we plan to implement a different resolution. We have redesigned a draft MES screen in SSNAP. The SSNAP's screen, as drafted, asks "U.S. citizens, age 12 or older, applying for a SSN for the first time" a series of questions designed to determine if the applicant has already been assigned an SSN. If a question is answered "yes," it will prompt the SSA employee to obtain an explanation, to describe the evidence provided, and to verify the allegation before an SSN can be processed. We think that asking a series of targeted questions to elicit information about possible situations in which an applicant may have been assigned an SSN is more useful than trying to list reasons a U.S. citizen may not have been assigned an SSN. Further, the most likely reason a U.S. citizen would not have an SSN is that he or she resided outside the U.S. for an extended period of time." This question, "Has the number holder ever lived outside the U.S. for a prolonged period of time?" is already asked in both SS-5 Assistant and the newly drafted SSNAP screen.

Recommendation 3

SSA should consider requiring that field office personnel document why foreign-born U.S. citizens age 12 or older had not been assigned an SSN.

Response

We agree that documentation to support an allegation that a foreign-born U.S. citizen age 12 or older has not been assigned an SSN will improve the integrity of the SSN process. We intend to make that change to policy and procedures effective with the implementation of SSNAP in late 2008.

Recommendation 4

SSA should reemphasize to field office personnel the importance of requiring and/or documenting adequate evidence when processing SSN applications for U.S. citizens age 12 or older and take corrective action to address performance problems or training needs when Agency personnel do not comply with this requirement.

Response

We agree. We will issue a reminder to FO personnel, including a discussion of the planned additional controls within MES/SSNAP that will ensure compliance with this requirement.

Recommendation 5

SSA should consider coordinating with the Department of State to verify all *Reports of Birth Abroad.*

Response

We agree that verifying all Reports of Birth Abroad documents submitted as evidence of age in the enumeration process could improve the integrity of the SSN assignment process. We have worked with the Department of State (State) for several years to develop a more efficient manual process, as well as an electronic process to verify birth documents; however, we cannot unilaterally change our current agreement with them. Under our current agreement, they have agreed to verify only a limited number of documents submitted as evidence for claims and enumeration purposes. They have advised us that law enforcement verifications take precedence over SSA work. Any increase in the volume of requests would violate our agreement with them and likely delay the verification of the documents that we have reason to believe are fraudulent.

We would also need to evaluate the SSN fraud risk that has occurred and is associated with this proposed procedure. Implementation of verifying all birth records for U.S. born applicants has significantly impacted SSA resources, workloads and SSN processing times. We are concerned that implementing procedures to verify all Reports of Birth Abroad would place overwhelming burden on FO staff.

In an effort to further address this recommendation, within one month of the issuance of the final report we will provide a copy to State and ask that they work with us to develop an electronic verification process for these documents. However, as noted above, without their agreement and an evaluation on workload and resources, we are not in a position to implement this recommendation at this time.

OIG Contacts and Staff Acknowledgments

OIG Contacts

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Jeff Pounds, Audit Manager, 205-801-1606

Acknowledgments

In addition to those named above:

Janet Matlock, Auditor in Charge

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OI conducts and coordinates investigative activity 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 OIG liaison to the Department of Justice on all matters relating to the investigations of SSA programs and personnel. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

Office of the Chief Counsel to the Inspector General

OCCIG provides independent legal advice and counsel to the IG on various matters, including statutes, regulations, legislation, and policy directives. OCCIG 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. Finally, OCCIG administers the Civil Monetary Penalty program.

Office of Resource Management

ORM supports OIG by providing information resource management and systems security. ORM also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, ORM is the focal point for OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act of 1993.