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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**ASSESSMENT OF THE  
ENUMERATION AT ENTRY  
PROCESS**

**March 2005**

**A-08-04-14093**

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**AUDIT REPORT**

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# SOCIAL SECURITY

## MEMORANDUM

Date: March 15, 2005

Refer To:

To: The Commissioner

From: Inspector General

Subject: Assessment of the Enumeration at Entry Process (A-08-04-14093)

## OBJECTIVE

The objective of our review was to assess the effectiveness of the Social Security Administration's (SSA) Enumeration at Entry (EAE) process.

## BACKGROUND

SSA entered into agreements with the Departments of State (State) and Immigration and Naturalization Service,<sup>1</sup> in 1996 and 2000, respectively, to assist SSA in assigning Social Security numbers (SSN) to certain classes of immigrants.<sup>2</sup> SSA's goal in implementing the EAE process was to reduce the possible acceptance of counterfeit immigration documents by SSA personnel and eliminate duplicate contacts immigrants must make with Federal agencies. In October 2002, State and the Department of Homeland Security (DHS) began assisting SSA by collecting data needed for SSN assignment as part of the immigration process.

Currently, SSA only allows immigrants who are lawfully admitted as permanent residents (LAPR) and age 18 or older to voluntarily apply for an SSN through EAE.<sup>3</sup> By choosing to participate in EAE, LAPRs do not complete SSA's Form SS-5, *Application*

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<sup>1</sup> On March 1, 2003, the responsibility for providing immigration-related services and benefits was transferred from the Immigration and Naturalization Service to the U.S. Citizenship and Immigration Services, a bureau of the Department of Homeland Security (DHS).

<sup>2</sup> We use the term "immigrant" to refer to those individuals DHS admitted as permanent residents.

<sup>3</sup> SSA Program Operations Manual System (POMS), section RM 00202.315.

for a Social Security Card. Instead, they apply for an original or replacement SSN card<sup>4</sup> on State Form DS-230, *Application for Immigrant Visa and Alien Registration*. Once DHS admits an LAPR into the United States, it electronically transmits to SSA certain data elements needed for SSN assignment. Using these data, SSA's Modernized Enumeration System (MES) processes the record, assigns an SSN to the LAPR, and mails the SSN card to the address provided to State or DHS. Appendix B provides flowcharts of the EAE process.

As of September 30, 2004, SSA had issued EAE participants over 101,000 SSN cards.<sup>5</sup> According to SSA, in Fiscal Year (FY) 2004, it cost about \$24 and \$10 to process an SSN application at an SSA field office (FO) and through EAE, respectively.

To accomplish our objective, we reviewed SSA policies and procedures for assigning SSNs to LAPRs. In addition, we visited six FOs to observe staff processing immigrants' SSN applications. We also reviewed 50 EAE records that MES could not process (pending records) and discussed possible causes with FO management. To learn more about State and DHS' role in the EAE process, we visited two foreign service posts and five U.S. ports of entry. We also identified a population of 10,752 EAE records for which SSA assigned original SSNs from December 2003 through February 2004. From our population, we randomly selected a sample of 250 records to determine whether SSA assigned multiple SSNs to the same individual. We also reviewed EAE records for accuracy and completeness. Appendix C includes a detailed description of our scope, methodology and sample appraisal.

## RESULTS OF REVIEW

We commend SSA for its EAE initiative and believe it has the potential to strengthen SSN integrity and assist the Agency in delivering a higher quality of service to immigrants. However, we identified weaknesses in existing controls and operations we believe SSA needs to address to improve the efficiency and effectiveness of the EAE process. We project SSA assigned about 1,161 multiple SSNs to immigrants who received an SSN through EAE from December 2003 through February 2004. This figure represents about 11 percent of the SSNs the Agency assigned to EAE applicants during this period.<sup>6</sup> In addition, we determined that MES could not process 27,383 (26 percent) EAE applications during FY 2004 because of data incompatibility issues<sup>7</sup> among SSA, State and DHS. Furthermore, EAE records did not always include

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<sup>4</sup> Requests for SSN replacement cards through EAE generally occur when immigrants have previously been in the United States under a temporary work visa and, during that stay, obtained an original SSN. However, since that time, they may have misplaced their card or changed their name or immigration status.

<sup>5</sup> SSA's EAE counts are from November 2002 to September 30, 2004.

<sup>6</sup> We identified 27 (about 11 percent) instances in which SSA assigned multiple SSNs from our review of 250 sample records. We discussed each case with SSA personnel, and they agreed with our analysis.

<sup>7</sup> The electronic data State and DHS transmits to SSA does not always meet SSA's data requirements.

immigrants' complete names or SSNs. Although the EAE process shows significant promise, we believe SSA must resolve these weaknesses before the Agency expands EAE to other classes of noncitizens.

### **SSA ASSIGNED MULTIPLE SSNs TO IMMIGRANTS**

We project SSA assigned about 1,161 multiple SSNs to immigrants who received an SSN through EAE during our 3-month audit period (see Appendix C, Table 1). This amount represents about 11 percent of the 10,752 original SSNs the Agency assigned to EAE applicants during this time. We believe SSA erroneously assigned these immigrants more than one SSN because

- SSA system edits did not identify previously assigned SSNs or multiple SSN applications, and
- FO personnel improperly resolved enumeration feedback messages (EM).

The SSN has become one of the most important keys to social, legal and financial assimilation in the United States. As such, we believe SSA has a responsibility to ensure effective controls are in place to prevent improper SSN assignment. We believe an 11-percent error rate is undesirable, and SSA must make immediate changes in its EAE process. If SSA does not take a proactive role in addressing weaknesses in its controls and operations, and all variables remain constant, we estimate SSA will assign multiple SSNs to about 23,220 immigrants over the next 5 years.<sup>8</sup> This is particularly important given SSA's interest in expanding EAE to other classes of noncitizens. We discuss in greater detail below factors we believe contributed to multiple SSN assignment.

### **System Edits Did Not Identify Duplicate Applications Processed on the Same Date or Previously Assigned SSNs**

We estimate SSA assigned about 903 (about 78 percent) of the projected 1,161 multiple SSNs to immigrants because system edits did not identify (1) duplicate applications submitted on the same date or (2) previously assigned SSNs (see Appendix C, Estimate 1). When SSA's MES processes each SSN application, the system runs an "edit routine" to determine whether any duplicate applications were submitted on the same date. In doing so, MES compares certain positions of the applicants' first and last names and dates of birth with other applications to be processed that day. However, we identified instances in which duplicate applications were entered into MES on the same date, but the matched records had variations in the applicant's name or date of birth. In one case, the EAE record had a double surname, while the FO-created record

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<sup>8</sup> We based this estimate on the projected number of immigrants who received multiple SSNs during our review, and projected it over the next 5 years. Therefore, we calculated our estimate as follows:  
 $1,161 \times 4 \text{ quarters} \times 5 \text{ years} = 23,220$ .

showed only one surname. We believe SSA needs to enhance its duplicate record detection routine to provide greater assurance of identifying duplicate requests submitted on the same day.

Once a record passes the duplicate record detection routine, MES searches its SSN master file for SSNs the Agency may have previously assigned the applicant. During the search, MES compares numerous data fields on the incoming SSN application with the master file. However, we identified instances in which edits failed to identify SSNs previously assigned to applicants because there was a variance in the applicant's first or last name or date of birth. In one case, the EAE record had a single first name, while the FO-created record showed a compound first name. We believe SSA needs to enhance its search routine to ensure previously assigned SSNs are identified.

### **FO Personnel Improperly Resolved Enumeration Feedback Messages**

When the previously assigned SSN detection routine identifies a record on the SSN master file containing applicant information similar to that shown on an incoming EAE application, MES generates an EM and transmits it to the servicing FO for investigation and resolution. SSA instructions require that FO personnel compare master file information (name, date and place of birth, gender, alien status, parents' names) with the corresponding data on the incoming EAE record to determine whether a match exists.<sup>9</sup> If FO personnel determine there is a previously assigned SSN, they should record the master file SSN on the incoming EAE application, which will cause MES to issue a replacement card. However, if FO personnel fail to do so, MES will assign an original SSN.

We estimate SSA assigned about 258 (about 22 percent) of the projected 1,161 multiple SSNs to immigrants because FO personnel improperly resolved EMs (see Appendix C, Estimate 2). In almost all instances, immigrants' first and last names and dates of birth on the matched records were identical. While there were some variations in parents' names, applicants' genders or city of birth, there was enough information on the master file and the incoming EAE application to clearly indicate the records belonged to the same individual. SSA representatives reviewed these cases and agreed that each set of records belonged to one individual. We believe FO personnel need to exercise greater care when resolving EMs.

### **IMMIGRANTS APPLIED FOR SSNs THROUGH ENUMERATION AT ENTRY AND AT FOs**

One of EAE's key features is that it allows immigrants to apply for an SSN as part of the immigration process rather than requiring that they visit an SSA FO. However, we are concerned that a number of immigrants apply for SSNs through EAE and at FOs. In fact, many immigrants visit an FO within the first week of entering the country. SSA personnel at five of the six FOs we visited told us that most immigrants who apply for SSNs through EAE also apply at an FO. Our findings appear to support their concerns.

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<sup>9</sup> Modernized Systems Operations Manual, section 303-A (EM-3).

We estimate that about 645 (about 56 percent) of the projected 1,161 immigrants with multiple SSNs visited an SSA FO within 1 week of entering the country (see Appendix C, Estimate 3).<sup>10</sup> Furthermore, our analysis of 50 EAE records that MES could not process (pending records) showed that 30 (60 percent) immigrants obtained an SSN at an FO, most of whom did so within 1 week of entering the country.

Based on our discussions with SSA, State and DHS personnel, we believe the following factors may contribute to immigrants applying for SSNs through EAE and at FOs. Specifically, immigrants

- may not fully understand SSA's SSN assignment process because the Agency's instructional handout (provided to the immigrant at a foreign service post) is not always in the individual's native language;<sup>11</sup>
- may forget they applied for an SSN at a foreign service post because they may have up to 6 months to travel to the United States after visa approval;
- do not always receive accurate information from DHS regarding SSN attainment;<sup>12</sup>
- visit FOs because they believe they can obtain an SSN quicker; and
- must visit an FO to obtain an SSN for their children who are under age 18, and while there, also apply for their own SSN again.

We believe EAE's efficiency and effectiveness is diminished when immigrants apply for SSNs through EAE and at FOs. This not only increases FO workload and administrative costs, it impacts SSN integrity because of the potential for multiple SSN assignment. We recognize that SSA depends on assistance and support from State and DHS in assigning SSNs to immigrants. Nevertheless, we believe SSA, as the agency ultimately responsible for SSN assignment, has a duty to ensure State and DHS correctly educate immigrants on the steps they must take to obtain an SSN.

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<sup>10</sup> We determined that 15 (about 56 percent) of the 27 immigrants with multiple SSNs visited an FO within 1 week of entering the United States as an LAPR.

<sup>11</sup> The American Consulate in Ciudad Juarez, Mexico, translates SSA's handout into Spanish.

<sup>12</sup> At one U.S. port of entry we visited, DHS provided all immigrants with an informational paper that instructed them to use their immigration document to apply for an SSN card. In November 2004, SSA contacted this port of entry and it began distributing the correct hand out. Additionally, FO staff told us that some DHS personnel instruct immigrants to immediately visit SSA, which may include those who applied for an SSN through EAE.



## **DATA INCOMPATIBILITY ISSUES PREVENTED PROCESSING OF SOME EAE RECORDS**

MES could not process 27,383 (26 percent) of the 103,383 EAE records SSA received in FY 2004 because of data incompatibility issues among the Agency, State and DHS. As such, immigrants had to visit an FO to obtain an SSN, which defeats the purpose of EAE. This increases FO workload and Agency administrative costs. Had MES processed these EAE applications, we estimate the Agency could have saved approximately \$657,000 in FY 2004, assuming all immigrants later obtained an SSN through an FO.<sup>13</sup> If data incompatibility issues prevent MES from processing EAE records, and all variables remain constant, we estimate SSA may incur about \$3.3 million in additional costs over the next 5 years.<sup>14</sup> Resolution of the data incompatibility issue is particularly important given SSA's interest in expanding EAE to other classes of noncitizens.

When EAE records have invalid information in one or more data fields, MES places them on a "pending file." Our analysis of 50 pending EAE records disclosed that 48 (96 percent) failed to process because characters in the applicant's address field were not compatible with MES data requirements. These invalid characters were primarily commas, periods, colons, semicolons, ampersands and improperly placed blank spaces. For example, MES could not process an EAE record that included a period after "Street" (St.) in the address field.

SSA personnel acknowledged that data incompatibility problems prevent processing of some EAE records. SSA personnel explained that they provided State and DHS with specific data requirements, but the other agencies' data systems continue to allow characters MES will not accept. Although SSA no longer holds regular discussions with State and DHS, SSA personnel told us they still communicate when problems occur.

We believe EAE's efficiency and effectiveness is reduced when one of every four EAE applicants cannot obtain an SSN unless they visit an FO. As such, we believe SSA needs to continue to work with State and DHS to resolve data incompatibility issues. Until SSA resolves these issues, the Agency should consider contacting EAE applicants whose SSN applications could not be processed. The Agency relies on EAE applicants to eventually visit or call an SSA FO to inquire about his/her application. If the immigrant visits an FO to apply for an SSN and system edits identify the pending record, MES will process the EAE transaction and remove it from the pending file.<sup>15</sup>

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<sup>13</sup> We based this estimate on the number of EAE records MES could not process in FY 2004 (27,383), using SSA's FY 2004 unit cost to process an SSN application at an FO (\$24). Therefore, we calculated our estimate as follows: 27,383 X \$24 = \$657,192.

<sup>14</sup> We based this estimate on the number of EAE applications MES could not process in FY 2004 and projected it over the next 5 years, using the FY 2004 unit costs. Therefore, we calculated our estimate as follows: \$657,192 X 5 years = \$3,285,960.

<sup>15</sup> Pending EAE applications remain in MES up to 365 days before dropping off SSA's system.



Given SSA's commitment to world-class service, we believe the Agency should attempt to contact SSN applicants to resolve EAE discrepancies.

### **EAE RECORDS DID NOT ALWAYS INCLUDE IMMIGRANTS' COMPLETE NAMES OR SSNs**

Although SSA allows initials and abbreviated names on SSN cards, Agency policy instructs FO personnel to include individuals' full names in the application field ("Full Name at Birth" or "Other Names Used").<sup>16</sup> We are concerned that EAE records State and DHS transmit to SSA do not always include immigrants' complete names or previously assigned SSNs, which are important identifying information for SSA records. Our analysis of EAE records disclosed instances in which State did not transmit immigrants' prior names as shown on the visa application. State also transmitted some EAE records with abbreviated names or initials. For example, we identified numerous instances in which State used the first name "Ma" instead of "Maria." Because of the limited information on these records, Agency edits may not always identify that a prior SSN exists.

Additionally, we identified instances in which State did not include immigrants' previously assigned SSNs on EAE records it forwarded to SSA, even though the immigrants included the SSNs on their visa applications. In all of these instances, SSA assigned the immigrants a second original SSN instead of a replacement card.

EAE's efficiency and effectiveness is diminished when SSA does not receive immigrants' complete names or previously assigned SSNs. EAE records with complete identifying information decrease the likelihood that SSA will assign multiple SSNs. Accordingly, we believe SSA must take a proactive role in addressing name standardization issues.

### **CONCLUSION AND RECOMMENDATIONS**

We believe EAE has the potential to assist the Agency in preventing fraud and improving customer service. We recognize SSA must rely on assistance and support from State and DHS. However, weaknesses exist in controls and operations we believe SSA needs to address to enhance the efficiency and effectiveness of the EAE process. This is particularly important given SSA's interest in expanding EAE to other classes of noncitizens. Ultimately, the success of SSA's efforts will depend on the priority it places on improving existing EAE controls and operations and how successful it is in obtaining assistance and support from State and DHS.

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<sup>16</sup> POMS, section RM 00202.105.

Accordingly, we recommend that SSA:

1. Enhance its duplicate record and previously assigned SSN edits to provide greater protection against multiple SSN assignment.
2. Reemphasize to FO personnel the importance of appropriate EM resolution to avoid multiple SSN assignment.
3. Cross-reference multiple SSNs the Agency assigned to immigrants we identified during our review. We will provide further details regarding these individuals under separate cover.
4. Continue to work with State and DHS to provide clear instructions to immigrants on SSN attainment.
5. Consider providing its handout regarding SSN attainment to immigrants in their native languages.
6. Continue to work with State and DHS to resolve data incompatibility issues, including name standardization.
7. Until SSA resolves its data compatibility problems, consider contacting EAE applicants to resolve pending records.

## **AGENCY COMMENTS AND OIG RESPONSE**

We believe SSA's response and planned actions adequately address Recommendations 1 through 6. However, we believe SSA's response to Recommendation 7 does not effectively address our concern that one of every four EAE applicants cannot obtain an SSN unless they visit an FO, which defeats the purpose of EAE. Given SSA's commitment to world-class service, we continue to believe the Agency should use available information to attempt to contact EAE applicants to resolve pending records.

Regarding SSA's response to Recommendation 7, we acknowledge that SSA may not always have complete or correct address information on pending EAE applications. However, we believe most EAE pending applications have adequate address information because SSA would have mailed an SSN card to the same address had MES processed the application. As stated in the report, MES failed to process EAE records primarily because of minor data incompatibility problems, such as commas, periods, colons, and other improperly placed blank spaces. As such, we believe SSA could review most of these pending records and generally determine it has adequate address information. We encourage SSA to reconsider its response to Recommendation 7.

SSA also provided technical comments that we considered and incorporated, where appropriate. The full text of SSA's comments is included in Appendix D. Additionally, because of State's significant role in the EAE process, we provided that agency a copy of the draft report for comments. State's comments are included in Appendix E.

## OTHER MATTER

### FO Personnel Did Not Always Comply with Enumeration Policies and Procedures

During our FO visits, we determined that SSA personnel were generally complying with EAE policy,<sup>17</sup> but they did not always comply with other Agency enumeration policies. For example, we observed SSA personnel

- not using black lights when reviewing DHS evidentiary documents,<sup>18</sup>
- inputting applicant names in MES that differed from the names shown on identity documents presented, and<sup>19</sup>
- enumerating all family members at one time.<sup>20</sup>

Because we previously reported on FO noncompliance with enumeration policies and procedures, we are not making any recommendations related to the observances of noncompliance detected during this review.<sup>21</sup>



Patrick P. O'Carroll, Jr.

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<sup>17</sup> POMS, section RM 00202.315, informs SSA staff of the EAE process and provides instructions on how to process applications for recently admitted LAPRs who are over 18 and applying for an original SSN.

<sup>18</sup> POMS, section RM 00203.040.

<sup>19</sup> POMS, section RM 00202.105.

<sup>20</sup> POMS, section RM 00204.270, instructs FO staff to process family member's applications 2 days apart.

<sup>21</sup> *Field Offices' Compliance with Policies and Procedures When Processing Noncitizen Social Security Number Applications* (A-08-04-14005, August 2004); *Compliance with Policies and Procedures When Processing Noncitizen Social Security Number Applications at Foreign Service Posts* (A-08-04-14060, August 2004); and *Brooklyn Social Security Card Center's Compliance with Policies and Procedures When Processing Noncitizen Social Security Number Applications* (A-08-04-14061, August 2004).

# *Appendices*

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APPENDIX A – Acronyms

APPENDIX B – Flowcharts of the Enumeration at Entry Process

APPENDIX C – Scope, Methodology and Sample Appraisal

APPENDIX D – Agency Comments

APPENDIX E – Department of State Comments

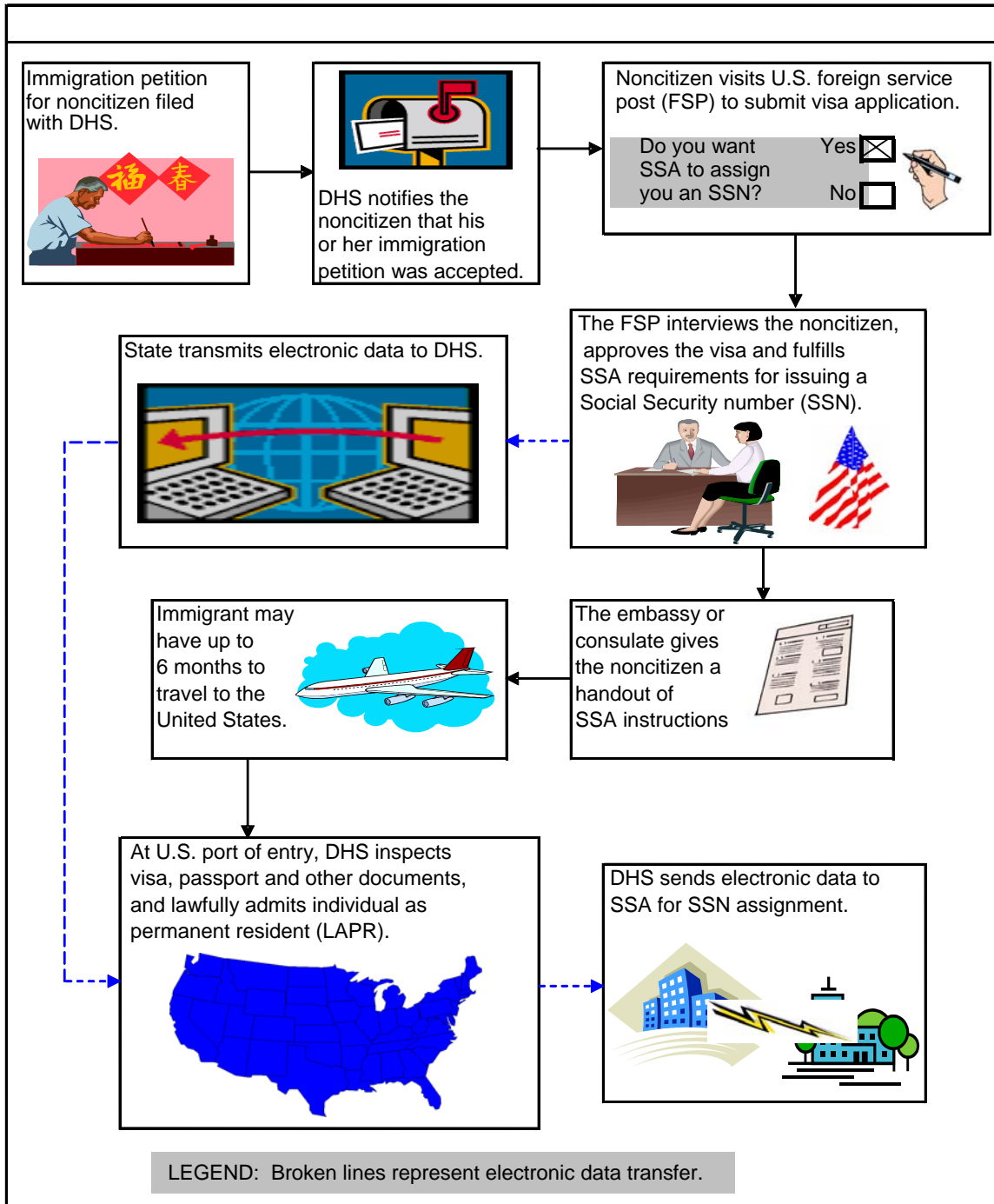
APPENDIX F – OIG Contacts and Staff Acknowledgments

### Acronyms

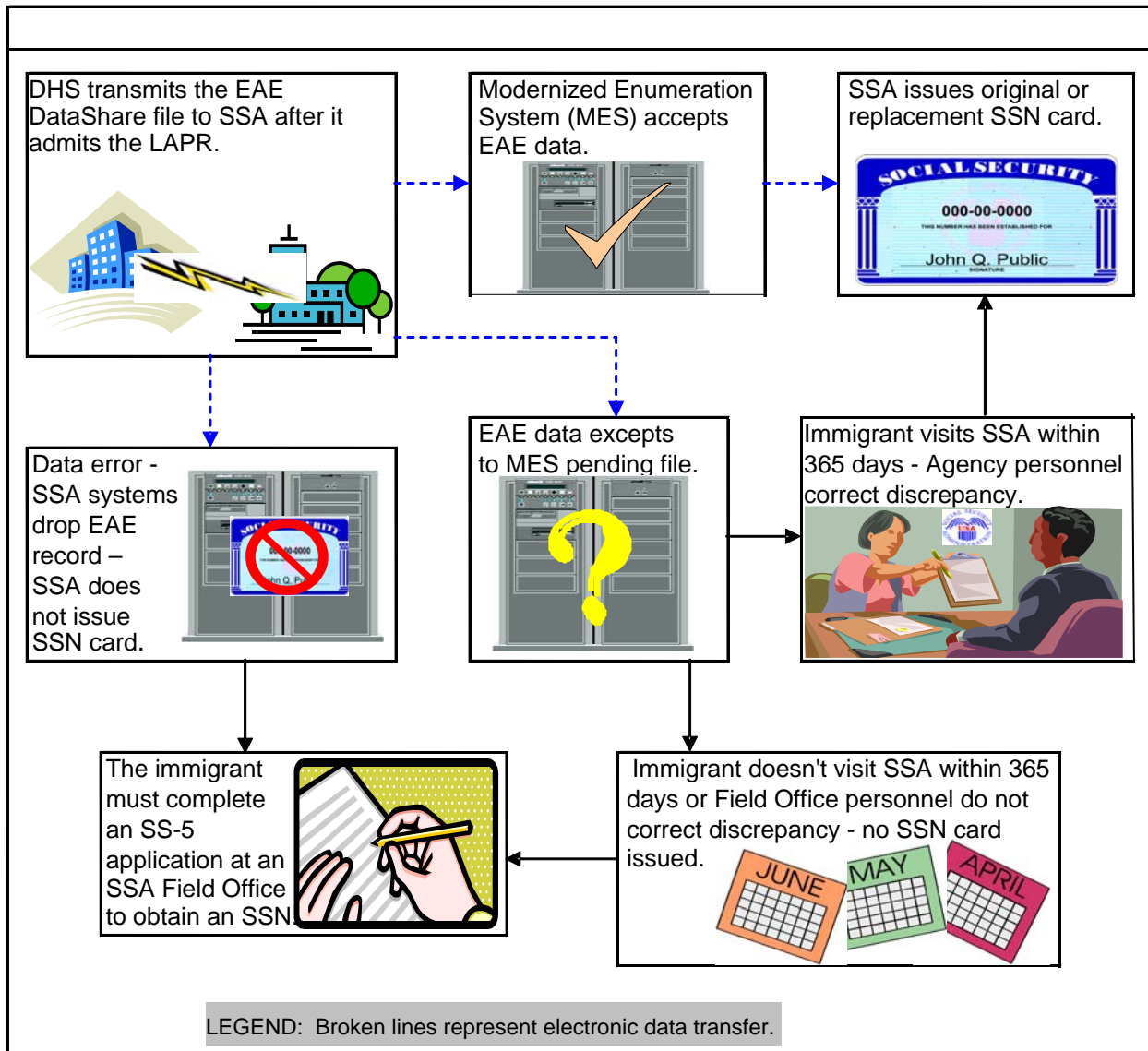
DS-230	<i>Application for Immigrant Visa and Alien Registration</i>
DHS	Department of Homeland Security
State	Department of State
EAE	Enumeration at Entry
EM	Enumeration Feedback Message
FO	Field Office
FY	Fiscal Year
LAPR	Lawfully Admitted as Permanent Resident
MES	Modernized Enumeration System
POMS	Program Operations Manual System
SS-5	<i>Application for a Social Security Card</i>
SSA	Social Security Administration
SSN	Social Security Number

# Flowcharts of the Enumeration at Entry Process

**Flowchart 1. Departments of State (State) and Homeland Security (DHS) Roles in the Social Security Administration's (SSA) Enumeration at Entry (EAE) Process**



**Flowchart 2. SSA's SSN Assignment via EAE**





# Scope, Methodology and Sample Appraisal

To accomplish our objective, we reviewed the Social Security Administration's (SSA) policies and procedures for assigning Social Security numbers (SSN) to lawfully admitted permanent residents (LAPR). We held discussions with SSA personnel responsible for enumeration policy and procedures, systems, and operations. We visited U.S. Consulates in Montreal, Canada, and Ciudad Juarez, Mexico. A representative from the Department of State's Office of Inspector General coordinated and accompanied us on our visit to Mexico. We also visited five Department of Homeland Security (DHS) ports of entry and six SSA field offices (FO) in New York, New Jersey, Texas, and California. We selected the DHS locations based on the volume of immigrants and nearby SSA FOs with a high average of Enumeration at Entry (EAE) pending and/or processed records.

We interviewed personnel at each of the Consulates and ports of entry to obtain an understanding of their role in SSA's EAE process. In addition, we observed Consulate representatives interviewing applicants and processing immigrants' visas. We also observed DHS personnel interviewing intended immigrants and admitting LAPRs.

During our site visits to SSA FOs, we interviewed staff to determine their knowledge of the EAE process. We also observed FO personnel interviewing LAPRs and processing immigrant SSN applications. We obtained data from each office regarding the number of EAE applications pending in SSA's Modernized Enumeration System (MES) either as a "not complete or investigate." We selected 50 EAE pending records (with status of "not complete") to determine why MES was unable to process them. We determined whether EAE applicants also visited an FO and applied again for an SSN. For those applicants who visited an FO, we determined how quickly the individual visited the FO after admission into the United States as an LAPR.

We also obtained SSA's MES transaction history file for noncitizens who obtained an original SSN via the EAE process from December 2003 through February 2004. From our population of 10,752 EAE records, we reviewed first names for completeness, and we randomly selected a sample of 250 records to determine whether SSA subsequently assigned a second SSN to those individuals.

The SSA entities reviewed were the Office of the Deputy Commissioner for Operations, Office of the Deputy Commissioner for Disability and Income Security Programs, and Office of the Deputy Commissioner for Systems. We relied primarily on MES to complete our review and determined the MES data used in the report were sufficiently reliable given the audit objective and use of the data. We conducted our work from March through November 2004 in accordance with generally accepted government auditing standards.

The following table shows our sample size, results, and appraisal.

**Table 1: Sample Results and Projection on Multiple SSNs Identified**

<b>SAMPLE ATTRIBUTE APPRAISAL</b>	
Total Population of Original SSNs SSA Assigned to Immigrants via the EAE Process from December 2003 through February 2004	10,752
Sample Size	250
Number of Instances in Sample Where SSA Assigned Multiple SSNs to Immigrants	27
<b>Estimate of Instances in Population Where SSA Assigned Multiple SSNs to Immigrants</b>	<b>1,161</b>
Projection—Lower Limit	834
Projection—Upper Limit	1,564
<i>Projection made at the 90-percent confidence level.</i>	

**Estimate 1: Estimation of Multiple SSN Cases Where System Edits Did Not Identify Duplicate Applications on Same Date or Previously Assigned SSNs**

We identified 27 (about 11 percent) multiple SSNs from our review of 250 sample cases. Of the 27 multiple SSN cases, we determined 21 of these occurred because system edits did not identify duplicate applications on the same date or previously assigned SSNs. Based on these results, we estimate about 903 (about 78 percent) of the projected 1,161 multiple SSNs are due to system edits not identifying duplicate applications on same date or previously assigned SSNs. We calculated our estimate as follows:  $21 \div 27 = .77777 \times 1,161 = 902.99$  (903).

**Estimate 2: Estimation of Multiple SSN Cases Where FO Personnel Improperly Resolved Enumeration Feedback Messages**

We identified 27 (about 11 percent) multiple SSNs from our review of 250 sample cases. Of the 27 multiple SSN cases, we determined 6 occurred because FO personnel improperly resolved enumeration feedback messages. Based on these results, we estimate about 258 (about 22 percent) of the projected 1,161 multiple SSNs are due to FO personnel improperly resolving EMs. We calculated our estimate as follows:  $6 \div 27 = .22222 \times 1,161 = 257.99$  (258).

### **Estimate 3: Estimation of Multiple SSN Cases Where Immigrants Visited an FO Within 1 Week of Entering the United States as an LAPR**

We identified 27 (about 11 percent) multiple SSNs from our review of 250 sample cases. Of the 27 multiple SSN cases, we determined 15 belonged to immigrants who visited an SSA FO within 1 week of entering the United States as an LAPR. Based on these results, we estimate about 645 (about 56 percent) of the projected 1,161 multiple SSNs belong to immigrants who visited an FO within 1 week of entering the United States as an LAPR. We calculated our estimate as follows:  $15 \div 27 = .55555 \times 1,161 = 644.99$  (645).

## Agency Comments



## SOCIAL SECURITY

MEMORANDUM

34065-24-1219

**Date:** February 22, 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 "Assessment of the Enumeration at Entry Process" (A-08-04-14093)--INFORMATION

We appreciate OIG's efforts in conducting this review. Our comments on the draft report content and 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 “ASSESSMENT OF THE ENUMERATION AT ENTRY PROCESS”  
(A-08-04-14093)**

Thank you for the opportunity to review and comment on the subject draft report. We agree that the Enumeration at Entry (EAE) process has the potential to assist in strengthening Social Security number (SSN) integrity and will provide high quality service to SSA’s immigrant population. We also appreciate your acknowledgement that the success, outside of our efforts to improve the EAE process, depends on the assistance and support from the Department of State (State) and the Department of Homeland Security (DHS).

As you are aware, we also conducted a review of the EAE process and the preliminary results of that review, which we shared with you on February 4, 2005, are consistent with your findings in that the EAE is more susceptible to multiple SSN issuances than the regular enumeration process. The specific recommendations being made based on our study are currently undergoing intercomponent review and are not yet final. We will use the data available from your review, as well as our study, to serve as the basis for making further enhancements to the EAE process.

Below are our responses to your specific recommendations as well as some technical comments that were developed to enhance the accuracy of the report.

**Recommendation 1**

The Social Security Administration (SSA) should enhance its duplicate record and previously assigned SSN edits to provide greater protection against multiple SSN assignment.

**Response**

We agree. We are forming a workgroup to look into changes to improve enumeration systems screening and will address this recommendation as part of that workgroup’s efforts. However, we also need to be cautious as unintended consequences can be produced by either tightening or loosening matching routines.

**Recommendation 2**

SSA should reemphasize to Field Office (FO) personnel the importance of appropriate Enumeration Feedback Message (EM) resolution to avoid multiple SSN assignment.

Response

We agree. FO personnel must process EM messages promptly and accurately to avoid the assignment of multiple SSNs. We will issue an Administrative Message (AM) with reminders on resolving EM messages related to the EAE process. We expect to release the AM in February 2005.

**Recommendation 3**

SSA should cross-reference multiple SSNs the Agency assigned to immigrants identified during the review.

Response

We agree. We have taken action to cross-refer the multiple SSNs identified during the review.

**Recommendation 4**

SSA should continue to work with State and DHS to provide clear instructions to immigrants on SSN attainment.

Response

We agree. We will work with State and DHS to provide clear instructions to immigrants on SSN attainment.

**Recommendation 5**

SSA should consider providing its handout regarding SSN attainment to immigrants in their native languages.

Response

We agree. We will contact State to discuss the feasibility of providing such handouts.

**Recommendation 6**

SSA should continue to work with State and DHS to resolve data incompatibility issues, including name standardization.

Response

We agree. We will contact State and DHS to discuss these data incompatibility issues and explore ways to resolve them.



**Recommendation 7**

Until SSA resolves its data compatibility problems, it should consider contacting EAE applicants to resolve pending records.

**Response**

We disagree. We do not have complete or correct address information on pending EAE applications, making contact with the applicants difficult or impossible.

## Department of State Comments



**United States Department of State**  
*Washington, D.C. 20520*

February 25, 2005

**MEMORANDUM**

UNCLASSIFIED

TO:           OIG – Cameron R. Hume, Acting Inspector General  
FROM:       CA – Daniel B. Smith, <sup>DD</sup>Acting  
SUBJECT:   Comments on Draft Report *Assessment of the Enumeration at Entry (EAE) Process*

CA has reviewed the subject draft report, which had been prepared by the Social Security Administration's Office of the Inspector General (SSA/OIG). Attached to this memorandum you will find comments on the report for your review and consideration.

Attachment:

Comments on SSA/OIG Report A-08-04-4093

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-2-

S:\VO Special Assistant\2005-02 Taskers\2005-02 Notes, Memos\T0182 IM  
to State OIG on SSA Comments

Drafted: CA/VO: Scott Oudkirk (x3-1152) (02-24-2005)

Cleared: CA/VO: TEdson -ok-  
CA/VO: JJacobs -ok-

UNCLASSIFIED

**Social Security Administration OIG Draft Report:  
“Assessment of the Enumeration at Entry (EAE) Process”  
(A-08-04-14093)**

**Department of State Comments**

**General Observations:** The report identifies important opportunities for improving this data-sharing arrangement. The Department of State is fully prepared to work closely with SSA and DHS to further refine the process that has been in place since October 2002. We agree the program should be strengthened prior to introducing additional data sharing for other visa categories.

The SSA/OIG draft Report did not make specific recommendations for State, but it points out some perceived weaknesses that we might address.

**1. EAE records did not always include immigrants’ complete names or SSNs.**

**Comment:** The SSA/OIG draft report is concerned that EAE records State and DHS transmit to SSA do not always include immigrants’ complete names or previously assigned SSNs. The State data are the most accurate and most up-to-date available to consular officers. Names are entered into visa records exactly as they appear in the applicant’s passport.

**2. State did not include immigrants’ previously assigned SSNs on EAE records it forwarded to SSA, even though the immigrants included the SSNs on their visa applications.**

**Comment:** Officers will be encouraged to double-check the information provided by the applicants to questions 33a and 33b on the IV application form (DS-230). However, our analysis showed that most of the information provided on the DS-230 is transmitted to the SSA by DHS, not DOS. It is not clear how the information is processed at the DHS level before being transmitted to SSA.

**3. SSA personnel explained that they provided State and DHS with specific data requirements, but that those agencies' data systems continue to allow characters MES will not accept.**

**Comment:** In any data-sharing regimen, Federal agencies may have different formatting standards. Generally, it is the receiving agency that must translate any differences so that its systems can effectively receive another agency's data. This is the most effective approach, rather than asking the sending agency to make itself aware of the intricacies of the receiving agency's database system. In other words, our view is that since SSA is aware of this issue, it would be best for SSA to create and manage a solution as part of its data quality assurance efforts.

S:\VO Special Assistant\2005-02 Taskers\2005-02 Notes, Memos\T0182  
Comments on SSA OIG Report

Drafted: CA/VO/I: Noubassem Namde (x3-2192) (02-23-2005)

Cleared: CA/VO/I: MSardinas -ok-  
CA/EX/CSD: DWilliams -ok-  
CA/VO/F/P: KChristensen -ok-  
CA/VO: DBean: -ok-  
CA/VO: TEdson -ok-  
CA/VO: JJacobs -ok-

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Rich Astor, Department of State, Office of Inspector General

Robert Wurster, Department of State, Office of Inspector General

For additional copies of this report, please visit our web site at [www.socialsecurity.gov/oig](http://www.socialsecurity.gov/oig) or contact the Office of the Inspector General's Public Affairs Specialist at (410) 965-3218. Refer to Common Identification Number A-08-04-14093.



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## **Office of Audit**

OA conducts and/or supervises financial and performance audits of the Social Security Administration's (SSA) programs and operations and makes recommendations to ensure program objectives are achieved effectively and efficiently. Financial audits assess whether SSA's financial statements fairly present SSA's financial position, results of operations, and cash flow. Performance audits review the economy, efficiency, and effectiveness of SSA's programs and operations. OA also conducts short-term management and program evaluations and projects on issues of concern to SSA, Congress, and the general public.

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## **Office of the Chief Counsel to the Inspector General**

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## **Office of Executive Operations**

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