
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**THE SOCIAL SECURITY
ADMINISTRATION'S USE
OF DEPORTATION DATA**

June 2005

A-14-04-24077

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:

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- 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: June 10, 2005

Refer To:

To: The Commissioner

From: Inspector General

Subject: The Social Security Administration's Use of Deportation Data (A-14-04-24077)

OBJECTIVE

The objective of our audit was to determine how effectively the Social Security Administration (SSA) used deportation data to identify and stop payments to individuals who were deported from the United States (U.S.). To achieve our objective, we examined the process and data that SSA relies on to control payments to deported beneficiaries.

BACKGROUND

Each month, the U.S. Citizenship and Immigration Services (USCIS),¹ a component of the Department of Homeland Security, notifies SSA of individuals deported from the U.S. This notification is required by the Social Security Act (Act)² and applies to individuals deported under specified provisions of the Immigration and Nationality Act (INA) of 1990.³

The Division of Employer Services (DES) in SSA's Office of Central Operations (OCO) receives the USCIS deportation list monthly. It verifies the Social Security number (SSN) and identity of each individual shown as deported on the USCIS list, and searches for a correct SSN if one is incorrect or missing. Once DES verifies the SSN, the OCO Annual Wage Reporting (AWR) staff inputs the deportation information to SSA's Disability, Railroad, Alien and Military Service (DRAMS) data base. Because the Act prohibits SSA from paying Social Security benefits to certain individuals deported from the U.S., SSA uses the deportation data to prevent unlawful benefit payments.

¹ Formerly known as the Immigration and Naturalization Service under the Department of Justice.

² The Social Security Act § 202(n)(2), 42 U.S.C. § 402(n)(2).

³ Pub. L. No. 104-208, § 237(a) (1997).

SSA is required to stop payments to Social Security beneficiaries⁴ beginning with the first month after SSA is notified of their deportation by USCIS.⁵ Additionally, SSA is required to stop payments to Supplemental Security Income recipients for any full calendar month they are outside the United States.⁶

As of July 1, 2003, DRAMS contained 207,391 deportation records. In May 2004, SSA implemented an automated process to receive and verify deportation information, and USCIS now provides that information on electronic media.

SAMPLING METHODOLOGY

To determine how effectively SSA manages deportation data, we reviewed applicable deportation laws and regulations, as well as relevant SSA policies and procedures. We interviewed appropriate SSA personnel and examined the detailed functional requirements of recent software enhancements, which affect the processing of deportation data. While our audit focused on how well SSA identifies and stops payment to individuals shown as deported, we also examined controls over the DRAMS deportation process.

We reviewed 5 percent of DRAMS deportation records. We first obtained all DRAMS deportation records, then arranged them into 20 segments in numerical order using the last 2 digits of the SSN. This process duplicated SSA's standard procedure for creating a segment that can be used to estimate an entire file.⁷ We selected 1 of the 20 segments for review and it contained 10,348 deportation records. To evaluate the 10,348 records, we obtained information from other SSA data bases (for more details see Appendix B).

RESULTS OF REVIEW

Although SSA has taken positive steps to automate the process it uses to manage DRAMS deportation data, audit results indicate that additional steps should be taken to ensure the integrity of DRAMS data so that the Agency has reliable data on which to base eligibility decisions. We found the following data anomalies that, on the surface, suggest errors in SSA's handling of records involving deported individuals. For example, DRAMS deportation records suggest the following conditions exist:

- Beneficiaries are mistakenly shown as deported.

⁴ SSA Program Operations Manual System (POMS) SI 02310.018.

⁵ The Social Security Act § 202(n)(2), 42 U.S.C. § 402(n)(2).

⁶ Social Security Act § 1611(f)(1), 42 U.S.C. § 1811(f)(1)

⁷ Records are sorted by the last 2 digits of the SSN (i.e. 00-04, 05-09, 10-14, etc.). For our review, we used the seventh segment of DRAMS or records where the SSN ended in 30-34.

- The Agency has given individuals credit for wages earned after notice of deportation. At times, SSA assigns SSNs to individuals shown as deported and then identifies them as U.S. citizens.
- SSA does not always record deportations reported by USCIS.

We believe these questionable data integrity conditions exist for the following three reasons:

- Deportation records are omitted or not recorded correctly when untrained and inexperienced DES staff manually verifies deportation data before keying the information into DRAMS.
- The deportation process has few control and follow-up procedures to ensure that deportation alerts either suspend benefits or, if appropriate, remove deportation records from DRAMS.
- SSA does not routinely reconcile DRAMS deportation data with information in other SSA data bases to identify and resolve data discrepancies.

INACCURATE DEPORTATION RECORDS FOR BENEFICIARIES

Based on our analysis of the 10,348 DRAMS deportation records since 1973, SSA has either recorded incorrect information on DRAMS, or paid benefits to individuals shown as deported. If DRAMS deportation records are incorrect, SSA employees cannot rely on the information to determine benefit eligibility. According to the Act,⁸ certain individuals deported from the U.S. under INA rules are ineligible to receive benefits beginning with the first month after SSA is notified of the deportation.

Table 1 reflects the results of our analysis of 119 beneficiaries whose DRAMS deportation records suggest that individuals were receiving benefits after being deported. For 11 of the 119 cases, the Agency suspended or terminated benefits as a result of deportations. Additional analysis of the remaining 108 cases demonstrated the questionable integrity of deportation data in DRAMS. This analysis included our review of Systematic Alien Verification for Entitlement records USCIS routinely sends to SSA, and SSA's review of the 108 cases. The reviews showed deportation or a temporary visitor status and possible benefit ineligibility for only 5 of the 108 cases. For some of the other deportation cases, subsequent review showed a change in immigration status and that SSA's deportation records are incorrect. They showed lawful admission to the U.S. for 39 of the 108 cases, and U.S. citizenship for 26 other cases. SSA recorded the wrong SSN on DRAMS for 35 individuals. We were able to find the correct SSNs for 5 of the 35 individuals. Three of the 108 individuals were receiving dependent or survivor benefits on another individual's record after deportation. These auxiliary beneficiaries are exceptions to payment suspension in accordance with SSA policy.⁹

⁸ Social Security Act, § 202(n)(1)(A), 42 U.S.C. § 402(n)(1)(A).

⁹ SSA, POMS RS 02635.001, § D.4.

Table 1. INDIVIDUALS SHOWN AS DEPORTED

USCIS Reported Status ¹⁰	Recorded as Deported in One Segment of DRAMS	Estimated Deported Individuals for 20 Segments
Deported or Temporary Visitor and Possibly Ineligible for Benefits	5	100
Exempted Auxiliary Beneficiary	3	60
U.S. Citizens ¹¹	26	520
Lawfully Admitted and Allowed to Work	39	780
Wrong Identity/SSN on DRAMS	35	700
Subtotal:	108	2,160
Suspended/Terminated as a Result of Deportation	11	
Total Records	119	

POST-DEPORTATION EARNINGS AND DATA ACCURACY

Since 1953, SSA has recorded on its Master Earnings File an estimated \$10.6 billion in post-deportation earnings for approximately 69,000 individuals shown as deported on DRAMS. Individuals who are shown as being deported and have covered earnings after deportation continue to earn credits toward future Social Security benefits.¹²

From the DRAMS deportation segment we analyzed, we found that SSA recorded approximately \$530 million in post-deportation earnings for 3,450 of 10,348 individuals (for details see Appendix D). However, because of the questionable integrity of DRAMS deportation data, we cannot determine if, in fact, the individuals were deported when these wages were posted to their earnings records. Although this data suggests that individuals shown as deported in DRAMS may be working in the U.S. illegally, they could be working outside the country for a U.S. company, or their immigration status may be incorrect in DRAMS.

The security problem implied—that non-citizens are in the U.S. illegally—should encourage SSA and USCIS to work together to determine the correct immigration status of individuals shown as both working and deported.

¹⁰ From these other data bases, (e.g., Numerical Identification or Numident and Systematic Alien Verification for Entitlement), we assessed immigration status as recorded on SSN applications and immigration status reports, respectively.

¹¹ According to the USCIS, deported individuals can be naturalized citizens who had their citizenship revoked.

¹² Social Security assigned an SSN not authorized for work to only 32 of the 3,450 deported individuals.

DEPORTATION AND ENUMERATION DATA ACCURACY

In analyzing DRAMS deportation cases, records suggest that SSA assigned individuals 4 original SSNs and issued 322 replacement SSN cards after recording their deportation. However, when assigning the SSNs, SSA categorized these individuals as U.S. citizens on its NUMIDENT¹³ data base. The inconsistency between DRAMS and the Numident raises concerns about the integrity of DRAMS data. Enumeration records showing U.S. citizenship for individuals listed as deported on DRAMS, particularly records established after notice of deportation, further demonstrate that SSA needs to either do a better job of removing erroneous deportation records from DRAMS, or correct its SSN records. If SSA employees cannot rely on DRAMS deportation data, they will have difficulty working deportation alerts and determining whether an individual is eligible to receive benefits. In addition, Social Security applicants who are correctly identified as U.S. citizens on SSN records, but incorrectly recorded as deported on DRAMS, may experience unnecessary delays when applying for Social Security benefits. The deportation records will alert SSA to their incorrect immigration status, and SSA's ensuing review may delay their Social Security benefit applications.

DEPORTATIONS GO UNRECORDED

Before May 2004, USCIS sent SSA paper listings of persons recently deported from the U.S. Now, it provides electronic records. In June 2004, SSA began using an automated enumeration process to verify the SSN and the identity shown on the deportation record. Like USCIS paper submissions, we estimate that approximately 84 percent of the electronic deportation records will not include a valid SSN.

For each deportation record that is submitted without an SSN, or with an incorrect SSN, SSA conducts an electronic search to identify the correct SSN assigned to the individual, if any. Based on SSA's experience with USCIS paper records, the electronic search will have limited success. If the correct SSN is not identified through the automated search, SSA will not revert to its previous deportation procedures and have DES employees perform a manual search for the individual's correct identity and SSN.

USCIS sent 14,635 deportation records to SSA in 12 separate paper listings from February 2002 through April 2003 (for details see Appendix E). To review the USCIS records, we selected the third record on the first, middle and last page of each of the 12 listings—36 records in all. Because each page we selected contained 5 deportation records, the 36 pages listed 180 total records. We found USCIS either reported an incorrect SSN or no SSN for 152 (84 percent) of the 180 records.

The 36 records we selected for review had been screened by SSA's manual verification procedures. While DES staff purportedly located and/or verified SSNs for 16 of the 36 records, they were unable to locate SSNs for the remaining 20 records. We found that 3 of the 16 verified SSNs belonged to someone other than the individual listed on

¹³ The NUMIDENT data base is a result of SSA's enumeration process. When individuals apply for an SSN, SSA staff assigns an SSN and records information from the application on the NUMIDENT.

the deportation record. Because the wrong SSN was recorded on DRAMS, SSA would not detect deportation for these individuals if they filed for benefits using different, possibly their own correct, SSNs. We searched USCIS records and located a correct SSN for one of the three individuals.

We also searched USCIS immigration records and located SSNs for 2 of the 20 records that were missing an SSN. The missing SSNs prevented SSA from recording the deportation information on DRAMS. Again, the two individuals shown as deported could fraudulently file for SSA benefits and go undetected.

In summary, the DES manual process for verifying incoming deportation records did not record information correctly in 5 of the 36 cases we examined. Even though SSA has automated part of this process, errors similar to the ones we found will continue to occur if SSA uses manual verification.

INCOMPLETE DEPORTATION PROCESS

SSA's new system for processing USCIS deportation records electronically matches those records with SSA enumeration records. This match attempts to verify the individual's SSN and identity. However, it does not compare citizenship status on the deportation and enumeration records to identify and help resolve data discrepancies. Also, it does not electronically match deportation records to USCIS immigration records to verify the deportation status or possibly locate SSNs for records missing an SSN.

Manual Verification Procedures

We found insufficient controls over the DES manual verification process. DES employees, who manually verified deportation records only when other workloads were not backlogged, need additional training and experience. For example, DES frequently had a student intern read the printed deportation records and compare them to enumeration records to identify and verify SSNs. If, in the intern's judgment, demographic information on the deportation record did not match enumeration data, the record was crossed out. If the intern believed that the information matched, he or she wrote "OK" and the verified SSN next to the printed record. DES sent marked-up listings to AWR staff to input records into SSA systems and ultimately the DRAMS data base. Procedures did not require the intern to check USCIS immigration records to confirm the individual's SSN or current immigration status.

Controls over Deportation Alerts

The enumeration verification process creates output files that SSA systems use to establish incoming USCIS deportation records in DRAMS. SSA systems use the incoming records to search the Master Beneficiary Record and Supplemental Security Record (SSR) to detect benefit payments. If benefit payments are detected, automated alerts are sent to appropriate SSA field office staff to verify the need to suspend

payments. There are two alert processes, one controlled by the Payment Center Action Control System and the other by the SSR. Neither provides automated feedback to SSA systems on the resolution of the alerts, nor do they initiate routine updates to DRAMS.

SSA has no automated procedures to follow up on deportation alerts when benefits continue months after field office staff are sent a deportation alert. Follow-up alerts are not produced. SSA relies on employee judgment and manual procedures in determining whether deportation records should be removed from DRAMS. When SSA field staff identifies situations that involve a change in deportation status, such as a mistaken identity or a beneficiary/recipient who is now in the U.S. legally, they are required to prepare an administrative message and request deletion of the DRAMS record.¹⁴ The administrative message is sent to a systems analyst in SSA headquarters. The analyst has to manually control the deletion request and send it to the AWR staff responsible for deleting the DRAMS deportation record.

Reconcile Data Base Records

SSA does not, on an ongoing basis, reconcile existing DRAMS deportation records with its enumeration or USCIS immigration records. If SSA did this, it would help verify individuals' current status and ensure data integrity. Currently, SSA routinely compares deportation records with other data bases when the records are received or, on an individual basis, when someone files for benefits. SSA has no procedures, however, to capture changes in immigration status across time, after individuals are established as deported on DRAMS.

CONCLUSIONS AND RECOMMENDATIONS

Although SSA has automated part of the process it uses to manage DRAMS deportation data, additional steps should be taken to ensure the integrity of DRAMS deportation data so that the Agency has reliable data on which to base eligibility decisions. Strengthening controls over that process to improve data accuracy would help ensure that SSA's handling of cases involving notice of deportation does not involve inappropriate benefit payment to deported individuals or credit for wages earned after deportation. Because conditions we found are indicative of unresolved deportations, a potential homeland security issue, SSA needs to resolve DRAMS discrepancies so those responsible for managing the deportation process can rely on DRAMS to determine whether individuals are in the U.S. illegally, and how their immigration status will affect their benefits.

¹⁴ SSA, POMS RS 02635.020.

We recommend SSA:

1. Ensure that only experienced and trained personnel manually verify incoming deportation records, and that all appropriate SSA data bases are used in the verification effort.
2. Establish procedures to ensure that deportation alerts and requests to delete deportation records are resolved timely.
3. Use SSN and immigration data to routinely identify inaccurate deportation records, and develop procedures to remove them from DRAMS.
4. Work with USCIS to determine the current status of individuals in the 108 sample cases from our review. Based on the results of the 108 cases, take appropriate action to identify and resolve similar cases in the remaining 19 segments of SSA's records.

AGENCY COMMENTS

SSA agreed with recommendations 1, 2 and 4. Regarding recommendation 3, while the Agency agreed with the goal of the recommendation, it did not believe that this approach was necessary or cost effective.



Patrick P. O'Carroll, Jr.

Appendices

[APPENDIX A](#) – Acronyms

[APPENDIX B](#) – Scope and Methodology

[APPENDIX C](#) – Analysis of One Segment of Deportation Data on DRAMS

[APPENDIX D](#) – Analysis of Earnings after Deportation

[APPENDIX E](#) – U.S. Citizenship and Immigration Services Report of Deported
Individuals

[APPENDIX F](#) – Agency Comments

[APPENDIX G](#) – OIG Contacts and Staff Acknowledgments

Acronyms

ACT	The Social Security Act
ALPHIDENT	Alphabetical Identification
AWR	Annual Wage Reporting
DES	Division of Employer Services
DHS	Department of Homeland Security
DRAMS	Disability, Railroad, Alien and Military Service
GAO	Government Accountability Office
INA	Immigration and Nationality Act
NUMIDENT	Numerical Identification
OCO	Office of Central Operations
POMS	Program Operations Manual System
SSA	Social Security Administration
SSR	Supplemental Security Record
SSN	Social Security number
U.S.	United States
USCIS	United States Citizenship and Immigration Services

Scope and Methodology

To help determine how effectively the Social Security Administration (SSA) uses deportation data to stop payments to beneficiaries shown as deported, we:

1. Reviewed applicable deportation laws and regulations as well as SSA policies and procedures pertaining to those laws. We also interviewed appropriate SSA personnel and reviewed documentation of SSA software enhancements that affect the processing of deportation data. This consisted of detailed functional requirements for the new deportation process.
2. Sorted Disability, Railroad, Alien and Military Service data base (DRAMS) deportation records by Social Security number (SSN) into national segmentation order (i.e. 00-04, 05-09, 10-14, etc.). From the sorted records, we selected and reviewed 1 of the 20 segments as of July 1, 2003, which is a standard SSA practice and representative of the entire deportation file.
3. Our segment contained 10,348 deportation records. For each record, we obtained data from the Master Beneficiary Record, Master Earnings File, Supplemental Security Record, and Numerical Identification (NUMIDENT).¹ We did this to determine whether: a) benefits were paid after SSA received notice of deportation, b) the individual was working in the U.S. after the date of deportation, or c) SSA enumeration records showed a legal immigration status for the individual shown as deported. Of the 10,348 records:
 - 9,664 individuals shown as deported had either never filed for benefits, or had filed and never received benefits;
 - 440 individuals shown as deported were allowed by operation of law² to receive benefits after deportation;
 - 11 individuals shown as deported had their benefits stopped when SSA received notice of deportation;
 - 125 individuals shown as deported had their benefits stopped before SSA received notice of deportation; and
 - 108 individuals were shown as deported and also receiving benefits after deportation. If these deportation records were correct, the individuals' benefits should have stopped.

¹ NUMIDENT data base contains information on individuals who have been assigned SSNs.

² The Social Security Act § 202(n)(1)(A), 42 U.S.C. 402(n)(1)(A).

4. We obtained current immigration records from the Department of Homeland Security (DHS) for the 108 individuals to substantiate their immigration status.
5. We selected 36 individuals from 12 separate deportation “input records” that DHS provided on paper listings to SSA over a 15-month period. We selected the third entry from the first, middle and last page of each of the 12 paper listings. We then searched for each of 36 deportation records on DRAMS, NUMIDENT, Alphabetical Identification (ALPHIDENT)³ and DHS’ Systematic Alien Verification for Entitlement data bases to determine how accurately SSA recorded the deportation information and to identify valid SSNs for records marked “Unable To Locate.”

To meet the objectives of our review, we assessed the reliability of DRAMS deportation data and determined that there are problems with the accuracy of the data. Our audit recommendations detail steps that SSA can take to improve data reliability. We audited components within the SSA Office of Systems and Office of Operations at SSA Headquarters in Baltimore, Maryland, between September 2003 and July 2004. We conducted the audit in accordance with generally accepted government auditing standards.

³ ALPHIDENT data base contains NUMIDENT information that is accessed using individual names.

Analysis of One Segment of Deportation Data on Disability, Railroad, Alien and Military Service¹

United States Citizenship and Immigration Services (USCIS) Reported Status	Individuals Shown as Deported	Estimated Individuals Shown as Deported ²
Deported or Temporary Visitor and Benefit Ineligible	5	100
Exempted Auxiliary Beneficiary	3	60
United States Citizens	26	520
Lawfully Admitted and Allowed to Work	39	780
Wrong Identity/Social Security Number (SSN) on Disability, Railroad, Alien, Military Services (DRAMS)	35	700
Subtotal	108	2,160
Suspended/Terminated as a Result of Deportation	11	
Suspended/Terminated Prior to Deportation	125	
Total Paid Benefits	244	
Legally Entitled to Continue Receiving Benefits after Deportation ³	440	
Never Received Payments	9,664	
Total Sample	10,348	2,160

¹ We used 5 percent of the DRAMS data base for our sample. To create segments, we prearranged and stored the earnings records in chronological order using the last 2 digits of the SSN. This duplicated a standard Social Security Administration procedure which allows a segment to estimate the entire file.

² Projected segment (5 percent) findings to entire population of DRAMS (Number x 20 segments).

³ There were 440 individuals recorded on the DRAMS segment who had filed for benefits but were deported for reasons that would not stop benefits. Because the Social Security Act, § 202(n)(1)(A), stipulates that benefits do not stop for individuals deported under certain USCIS categories, the 440 individuals were not included in our analysis.

Analysis of Earnings after Deportation

Records Where Earnings Were Recorded in Years after Deportation

Table 1

One Segment		Number of Segments	Projection to All Segments	
3,450 ¹	\$529,643,055	20	69,000	\$10,592,861,100

¹ $\$529,643,055 / 3,450 = \$153,519.73$ average earnings after deportation by deportees.

United States Citizenship and Immigration Services Report of Deported Individuals

Report Period	Total Deportation Records	Entries Reviewed	Verified the Wrong Social Security Number (SSN)	SSN Located for a Missing SSN ¹	Total Errors Identified
February 2002	1,355	3			
April 2002	260	3			
May 2002	295	3			
June 2002	920	3	2 ²		2
July 2002	1000	3	1		1
August 2002	1,520	3		1	1
September 2002	1,225	3		1	1
October 2002	1,560	3			
November 2002	930	3			
February 2003	1,225	3			
March 2003	2,585	3			
April 2003	1,760	3			
Totals	14,635	36	3	2	5

¹ Social Security Administration staff did not identify and record the deported individual's SSN on Disability, Railroad, Alien, and Military Services.

² Office of the Inspector General staff located the correct SSN for one of the two deported individuals.

Agency Comments



SOCIAL SECURITY

MEMORANDUM

33364-24-1190

May 9, 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, "The Social Security Administration's Use of Deportation Data" (A-14-04-24077)--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 (OIG) DRAFT REPORT, "SOCIAL SECURITY ADMINISTRATION'S USE OF DEPORTATION DATA" (A-14-04-24077)

Thank you for the opportunity to review and comment on the draft report. We are pleased that the results of this review found no evidence of widespread erroneous payments of Retirement, Survivors and Disability (RSDI) benefits or Supplemental Security Income (SSI) payments. Additionally, as indicated in the response to recommendation number 4, our review of the sample cases indicates that we have been effective in stopping payments to individuals who have been deported.

We acknowledge that the deportation information in the Disability, Railroad, Alien and Military Service (DRAMS) database may not be current in some cases. The information contained in DRAMS is not solely related to our current beneficiaries and recipients. We have never relied on DRAMS deportation data for determining *eligibility*, rather as an indicator of possible *ineligibility*. Further, the stated objective of this review was "to determine how effectively the Social Security Administration (SSA) used deportation data to identify and stop payments to individuals who were deported from the United States," not to evaluate the accuracy of the data contained in the DRAMS. Since we do not solely use DRAMS data to verify alien status or citizenship, we must evaluate the cost-effectiveness of any additional resource commitments to improve the data.

To address deportation data inaccuracies resulting from the limited interface with other SSA systems, effective May 2004, we implemented an automated process to receive and verify deportation information. The United States Citizenship and Immigration Service (USCIS), Department of Homeland Security (DHS), now provides that information on electronic media. The data is then matched electronically with our databases to generate deportation alerts.

Our responses to the specific recommendations are provided below.

Recommendation 1

SSA should ensure that only experienced and trained personnel manually verify incoming deportation records, and that all appropriate SSA data bases are used in the verification effort.

Response

We agree. Implementation of an automated system in May 2004 has greatly reduced the number of cases requiring manual action. A system is currently being planned that will put cases falling out of the automated system through a secondary automated verification system. This second automation effort will virtually eliminate the need for any manual input.

Recommendation 2

SSA should establish procedures to ensure that deportation alerts and requests to delete deportation records are resolved timely.

Response

We agree. In May 2004, we began processing deportation alerts for SSI recipients electronically. Under the new process, deportation alerts for SSI recipients are controlled by a limited issue diary. The field office gives priority attention to these diaries. We believe this new procedure will ensure the timely processing of SSI deportation alerts.

Recommendation 3

Use SSN and immigration data to routinely identify inaccurate deportation records, and develop procedures to remove them from DRAMS.

Response

While we agree with the goal of this recommendation, we do not believe this approach is necessary or cost effective. Currently deportation alerts are issued to SSA field offices only as an indicator that an individual receiving Social Security benefits or SSI payments may have been deported. Receipt of the alert prompts the field office employee to investigate the individual's current status and develop for possible ineligibility. The cases reviewed for this audit indicate that our current system is effective in identifying individuals whose benefits should be suspended due to deportation. We have never used the deportation data in the DRAMS database to determine benefit eligibility as that data is used only as an indicator of possible ineligibility. Since we use current evidence of citizenship or alien status to determine eligibility for benefits, for payment or for an SSN, it would not be practical or cost effective for us to attempt to maintain the DRAMS database as a record of current immigration status, especially since this information is available through DHS' Systematic Alien Verification for Entitlement (SAVE) database.

Recommendation 4

SSA should work with USCIS to determine the current status of individuals in the 108 sample cases from our review. Based on the results of the 108 cases, take appropriate action to identify and resolve similar cases in the remaining 19 segments of SSA's records.

Response

We partially agree and have already implemented the first part of the recommendation. Specifically, of the 108 sample cases reviewed, only five were determined to be *possibly* in deported status. The majority of these individuals were lawfully admitted to the U.S. subsequent to the deportation, and some have become U.S. citizens. A further investigation of these cases may show that fewer, or none, of the sample cases were actually in deported status. Based on the findings from our review of these cases, we do not believe that a review of the remaining 19 segments is warranted.

[In addition to the items listed above, SSA provided technical and other comments which have been addressed, where appropriate, in this report]

OIG Contacts and Staff Acknowledgments

OIG Contacts

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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.

Office of Investigations

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 Executive Operations

OEO supports OIG by providing information resource management and systems security. OEO also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, OEO 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.