
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**LAS VEGAS SOCIAL
SECURITY CARD CENTER**

February 2007

A-09-06-16101

AUDIT REPORT



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SOCIAL SECURITY

MEMORANDUM

Date: February 8, 2007

Refer To:

To: Peter D. Spencer
Regional Commissioner
San Francisco

From: Inspector General

Subject: Las Vegas Social Security Card Center (A-09-06-16101)

OBJECTIVE

Our objective was to evaluate the Social Security Administration's (SSA) compliance with policies and procedures when processing Social Security number (SSN) applications at the Las Vegas Social Security Card Center (LVSSCC).

BACKGROUND

On April 18, 2005, SSA opened the LVSSCC as part of its efforts to improve public service and strengthen the integrity of the enumeration process. LVSSCC processes all requests for original and replacement SSNs for residents of the Las Vegas Valley and greater Southern Nevada area. It was the second SSA office of its kind in the nation devoted entirely to processing SSN applications.¹ Some of the expected benefits include reduced wait times, fewer processing delays, and lower error rates. In its first 10 months, LVSSCC issued over 8,200 and 65,000 original and replacement SSN cards, respectively.

When an individual applies for an original SSN, he or she must complete, sign, and submit a Form SS-5, *Application for a Social Security Card*. U.S. citizens must provide acceptable documentary evidence of age, identity, and citizenship. Noncitizens must provide evidence of age, identity, and work-authorized lawful alien status or a valid nonwork reason. To obtain a replacement SSN card, an individual must complete a Form SS-5 and provide evidence of identity. Noncitizens must also provide evidence of work-authorized lawful alien status or a valid nonwork reason.²

¹ SSA opened the Brooklyn Social Security Card Center in Brooklyn, New York, in November 2002 and the Queens Social Security Card Center in Jamaica, New York, in July 2006.

² SSA, Program Operations Manual System (POMS), RM 00202.001 and RM 00203.001.

Effective December 17, 2005, the *Intelligence Reform and Terrorism Prevention Act of 2004* imposed new requirements to the enumeration process.³ These changes include acceptable evidence for identity and citizenship, a requirement to verify birth certificates for U.S.-born applicants for an original SSN, and a limit of 3 replacement Social Security cards per year and 10 over a lifetime.⁴

RESULTS OF REVIEW

We found that LVSSCC generally complied with SSA policies and procedures when processing SSN applications. However, we identified the following areas for improvement.

- Issuance of Social Security cards in the applicant’s legal name
- Completion of “relationship to applicant” field on the Form SS-5
- Supervisory review of original SSNs for U.S.-born applicants over age 12
- Inspection of identity documents submitted by applicants

We also found that SSA field offices (FO) improperly issued SSNs for residents in the LVSSCC servicing area. Finally, our review disclosed that LVSSCC did not provide adequate safeguards over the Social Security cards mailed to LVSSCC.

ISSUANCE OF SOCIAL SECURITY CARDS IN THE APPLICANT’S LEGAL NAME

Our review of a random sample of 200 original and replacement Social Security cards assigned to U.S. citizens and noncitizens⁵ found that LVSSCC had issued one Social Security card that was not in the applicant’s legal name. The applicant was a noncitizen who had applied for a replacement SSN. However, LVSSCC used a last name for the Social Security card that did not match the legal name on Department of Homeland Security (DHS) records. This occurred because the employee bypassed the alert process that verifies the applicant’s name with DHS.

DHS issues immigration documents in the person’s legal name. When immigration documents are presented as evidence for a Social Security card, the name on the immigration documents is presumed to be the person’s legal name. In addition, SSA

³ Pub. L. No. 108-458, § 7213.

⁴ SSA, Policy Instruction AM-05209 SEN, December 14, 2005.

⁵ Our random sample included 50 SSN applications from each of 4 strata consisting of (1) 693 original SSNs for U.S. citizens, (2) 1,674 original SSNs for noncitizens, (3) 12,984 replacement SSNs for U.S. citizens, and (4) 1,338 replacement SSNs for noncitizens.

policies state that its records should reflect the individual's legal name to comply with State matching agreements and for homeland security purposes.⁶

COMPLETION OF “RELATIONSHIP TO APPLICANT” FIELD ON THE FORM SS-5

Our review of a random sample of 200 SSN applications disclosed that LVSSCC staff did not complete the “relationship to applicant” field on the Form SS-5 for 40 (20 percent). According to LVSSCC staff, applicants complete a Form SS-5 before their interview. During the interview, SSA enters information from the Form SS-5 into the Modernized Enumeration System (MES) and prints a computer-generated application for the applicant to review and sign. SSA retains the computer-generated application and destroys the Form SS-5.

SSA policies state the person signing the Form SS-5 must indicate their relationship to the person for whom the Social Security card is requested. SSA staff must determine whether the person signing the Form SS-5 is a “proper applicant” and ensure the appropriate block is checked on the application.⁷ SSA defines a “proper applicant” as someone who can apply for and receive a Social Security card for themselves or for another person.⁸

SUPERVISORY REVIEW OF ORIGINAL SSNs FOR U.S.-BORN APPLICANTS OVER AGE 12

From December 17, 2005 to February 28, 2006, we identified 10 original SSNs issued to U.S.-born applicants over age 12. Our review found that LVSSCC improperly processed four (40 percent). Specifically, we found that (1) a supervisor (or equivalent) did not sign and clear the application through MES for two SSN applications, (2) LVSSCC staff did not document the verification of birth certificates presented for three SSN applications, and (3) LVSSCC staff did not document the identification of the individual applying on behalf of the applicant for one SSN application.⁹

⁶ SSA, POMS, RM 00203.210.A.2.

⁷ SSA, POMS, RM 00202.170.

⁸ SSA, POMS, RM 00202.005.A.3.

⁹ These errors are not mutually exclusive. One of the four SSN applications contained all three types of errors.

SSA policies require a mandatory in-person interview for U.S.-born applicants over age 12 to locate any previous SSN used and prevent an individual from assuming a false identity. SSA staff must immediately place the application in pending status while they verify the existence of a birth certificate and the statements made by the claimant for not possessing an SSN. In addition, a supervisor (or equivalent) must sign the completed application and clear it through MES.¹⁰

INSPECTION OF IDENTITY DOCUMENTS SUBMITTED BY APPLICANTS

During our review, we observed the LVSSCC staff process 41 original and replacement SSN applications for U.S. citizens and noncitizens. We found the identity documents submitted by applicants for 37 (90.2 percent) of these SSN applications were not inspected in accordance with SSA policies and procedures.

When an applicant submits an identity document, SSA policies require that the document be compared with a visual standard, if available. A visual standard is an exhibit of a document that is used for evaluating the authenticity of a document.¹¹ In addition, any documents submitted as evidence of citizenship must be examined and viewed under a black light to detect erasures.¹²

Of the 37 SSN applications, we identified 26 where LVSSCC staff did not use both a visual standard and black light to inspect the documents. Of the remaining 11, we found that 9 were not compared to a visual standard, and 2 were not viewed under a black light. Based on our interviews and observations, we believe LVSSCC staff had the resources to properly examine and verify the documents submitted as evidence for a Social Security card. However, the use of such resources varied among staff.

We believe LVSSCC staff should ensure all documents are compared to a visual standard and viewed under a black light to minimize the risk of assigning an SSN based on fraudulent documents and maintain the integrity of the enumeration process.

FOs IMPROPERLY PROCESSED SSN APPLICATIONS

We found that FOs did not always comply with SSA policies and procedures when processing SSN applications for residents within the LVSSCC servicing area. Between April 18, 2005 and February 28, 2006, 2,816 individuals with addresses in the LVSSCC servicing area had applied for and were issued original or replacement SSNs by FOs rather than LVSSCC.

¹⁰ SSA, POMS, RM 00202.055.

¹¹ SSA, POMS, RM 00203.200.B.4.

¹² SSA, POMS, RM 00203.040.B and RM 00203.310.C.

With the opening of LVSSCC, SSA policies state that all individuals with a mailing address in the servicing areas of the Las Vegas and North Las Vegas FOs must complete all SSN transactions at a card center. However, SSN transactions that are performed in conjunction with initial claims or post-entitlement actions may continue to be processed by the FO handling the related action.¹³

Las Vegas and North Las Vegas FOs

We found the Las Vegas or North Las Vegas FOs had processed 1,269 of the 2,816 SSN applications for individuals with mailing addresses in the LVSSCC servicing area. We selected a random sample of 50 of these applications. We found these FOs had improperly processed five (10 percent) of the SSN applications with no related initial claims or post-entitlement actions. This occurred, in part, because existing controls were not sufficient to preclude FOs from processing SSN applications for residents within the LVSSCC servicing area.

SSA developed the SS-5 Assistant, a Microsoft Access-based application, to work in conjunction with MES to support the processing of SSN applications. Effective April 11, 2005, the SS-5 Assistant generates an on-screen alert when SSA staff located outside the LVSSCC enter address information for an applicant residing within the areas serviced by the LVSSCC. However, the SS-5 Assistant allows SSA staff to bypass the alert and continue with processing the SSN application.¹⁴

FOs Outside of LVSSCC Servicing Area

We found that FOs outside of Las Vegas had processed 1,547 of the 2,816 SSN applications for individuals with a mailing address in the LVSSCC servicing area. We selected a random sample of 50 of these applications. We found these FOs had improperly processed 48 (96 percent) of the SSN applications with no related initial claims or post-entitlement actions. In July 2006, we referred these cases to the San Francisco Regional Office for corrective action.

To prevent future occurrences, we encourage SSA to strengthen controls to ensure SSN applications for individuals with mailing addresses in the LVSSCC servicing area are processed by a card center rather than an FO. As a result of our review, SSA issued a reminder in September 2006 on the proper procedures for referring individuals who are conducting SSN business and live in geographic areas serviced by a card center.¹⁵

¹³ SSA, POMS, RM 00201.015.B.2.

¹⁴ SSA, Policy Instruction AM-05053 SEN, April 11, 2005.

¹⁵ SSA, Policy Instruction EM-06058, September 19, 2006.

CONTROLS OVER SOCIAL SECURITY CARDS MAILED TO LVSSCC

We found that LVSSCC did not provide adequate safeguards over the Social Security cards mailed to LVSSCC. Specifically, we found that LVSSCC could improve its controls to ensure Social Security cards were properly (1) received, distributed, or destroyed and (2) addressed to the FO manager, as required.

Receipt and Disposition of Social Security Cards

We found that controls over the receipt and disposition of Social Security cards mailed to LVSSCC could be improved. LVSSCC did not maintain documentation of the Social Security cards received, distributed, or destroyed. Between April 18, 2005 and February 28, 2006, 981 Social Security cards had been mailed to LVSSCC. However, LVSSCC could not determine whether these cards were received by LVSSCC, picked up by the applicant, or destroyed.

SSA policies state that applicants who plan to relocate but do not have a forwarding address, are homeless, or have experienced problems with nonreceipt of mail may have their Social Security cards mailed to an SSA office.¹⁶ However, SSA policies do not provide specific guidance for securing; monitoring; tracking; or, if necessary, destroying cards mailed to the office.

LVSSCC places all Social Security cards mailed to the card center in a file cabinet. According to LVSSCC management, the applicant must show proper identification before staff will release the card to the applicant. LVSSCC periodically removes any cards that the applicant did not pick up. These cards are generally destroyed about 2 months after the SSN applications are completed.

As a result of our review, LVSSCC implemented procedures to document the receipt, control, and disposition of Social Security cards mailed to the card center. These procedures included a spreadsheet to record the date each card is received; name and SSN on the card; date it is picked up; name of management official releasing the card to the applicant; and date the card is shredded, if not picked up within 30 days. In addition, the San Francisco Regional Office issued procedures to ensure Social Security cards mailed to all FOs are properly controlled and safeguarded.¹⁷

¹⁶ SSA, POMS, RM 00202.110.B.2.

¹⁷ SSA, Regional Memorandum No. F-06-019, September 12, 2006.

Social Security Cards Not Properly Addressed

Of the 981 Social Security cards mailed to LVSSCC from April 18, 2005 to February 28, 2006, we found that 970 (98.9 percent) were not addressed in accordance with SSA policies and procedures. This occurred because LVSSCC staff was not fully aware that Social Security cards mailed to LVSSCC should be addressed to the FO Manager. Instead, LVSSCC staff entered the mailing address of the card center without a “care of” or “attention” heading.

SSA policies allow applicants to pick up their Social Security cards at an SSA office. However, any cards mailed to an SSA office should be addressed directly to the FO manager.¹⁸

As a result of our review, in August 2006, SSA updated the SS-5 Assistant to include the heading “SSA FO Manager” with the LVSSCC address. LVSSCC management instructed its staff to use the new address format when processing applications for Social Security cards to be mailed to the card center.

CONCLUSION AND RECOMMENDATIONS

Except as noted above, LVSSCC generally complied with SSA policies and procedures when processing SSN applications. In addition, LVSSCC has taken proactive steps to address some of our findings to ensure all staff fully complies with SSA policies and procedures when processing an SSN application. We recommend that the San Francisco Regional Office:

1. Ensure LVSSCC staff fully complies with SSA policies and procedures when processing SSN applications for original and replacement Social Security cards. Some of the areas of specific attention should be:
 - use of legal name on immigration documents for Social Security cards issued to noncitizens;
 - completion of “relationship to applicant” field on the Form SS-5;
 - supervisory review of original SSN applications for U.S.-born individuals over age 12; and
 - inspection of identity documents submitted by applicants through use of a visual standard and black light.
2. Continue to monitor controls to ensure SSN applications for individuals with mailing addresses in the LVSSCC servicing area are processed by a card center rather than a FO.

¹⁸ SSA, POMS, RM 00202.110.B.2.

3. Continue to monitor procedures to ensure Social Security cards mailed to LVSSCC are properly controlled and safeguarded.

AGENCY COMMENTS

SSA agreed with all our recommendations. See Appendix C for the full text of SSA's comments.



Patrick P. O'Carroll, Jr.

Appendices

APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Agency Comments

APPENDIX D – OIG Contacts and Staff Acknowledgments

Acronyms

DHS	Department of Homeland Security
FO	Field Office
Form SS-5	<i>Application for a Social Security Card</i>
LVSSCC	Las Vegas Social Security Card Center
MES	Modernized Enumeration System
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
SSN	Social Security Number

Scope and Methodology

We obtained a data extract from the Social Security Administration's (SSA) Modernized Enumeration System (MES) Transaction History File. From this extract, we identified a population of 16,689 individuals who had applied for original or replacement Social Security number (SSN) cards at the Las Vegas Social Security Card Center (LVSSCC) between December 17, 2005 and February 28, 2006. We selected a random sample of 200 SSN applications from 4 strata (that is, 50 SSN applications per stratum) consisting of (1) 693 original SSNs for U.S. citizens, (2) 1,674 original SSNs for noncitizens, (3) 12,984 replacement SSN cards for U.S. citizens, and (4) 1,338 replacement SSN cards for noncitizens.

We also identified a population of 2,816 individuals with addresses in the LVSSCC servicing area who had applied for original or replacement SSN cards at field offices (FO) rather than LVSSCC between April 18, 2005 and February 28, 2006. We selected a random sample of 100 SSN applications from 2 strata (that is, 50 SSN applications per stratum) consisting of (1) 1,269 original and replacement SSN cards assigned at the Las Vegas and North Las Vegas FOs that are within the LVSSCC servicing area, and (2) 1,547 original and replacement SSN cards assigned at other FOs that are outside the LVSSCC servicing area.

To accomplish our objective, we:

- Reviewed the applicable Federal laws, SSA's Program Operations Manual System, and other policy memorandums.
- For each sample item, obtained query from SSA's Numident and reviewed the Form SS-5, *Application for a Social Security Card*.
- Observed the processing of SSN applications by LVSSCC staff to determine compliance with SSA policies and procedures.
- Independently verified documents submitted by applicants with the issuing agency, including immigration documents with the Department of Homeland Security, birth certificates with the Bureau of Vital Statistics, and driver's licenses and identification cards with the Department of Motor Vehicles.
- Interviewed SSA employees from LVSSCC, the San Francisco Regional Office, Office of Central Operations, and Office of Public Service and Operations Support.

We determined the computer-processed data from MES were sufficiently reliable for our intended use. Our work was conducted at LVSSCC in Las Vegas, Nevada, and San Francisco Regional Office in Richmond, California, between April and October 2006. The entity reviewed was the San Francisco Regional Office under the Deputy Commissioner for Operations. We conducted our audit in accordance with generally accepted government auditing standards.

Agency Comments

**COMMENTS OF THE SOCIAL SECURITY ADMINISTRATION (SSA) ON THE
OFFICE OF INSPECTOR GENERAL (OIG) DRAFT REPORT, “AUDIT OF THE
LAS VEGAS SOCIAL SECURITY CARD CENTER (A-09-06-16101)**

Thank you for the opportunity to review and comment on the subject draft report. Our responses to the specific recommendations are provided below. The objective of the audit was to evaluate the Social Security Administration’s compliance with policies and procedures when processing Social Security number applications at the Las Vegas Social Security Card Center (LVSSCC).

Recommendation 1

Ensure LVSSCC staff fully complies with SSA policies and procedures when processing SSN applications for original and replacement Social Security Cards. Some of the areas of specific attention should be:

- use of legal name on immigration documents for Social Security cards issued to non-citizens;
- completion of “relationship to applicant” field on the Form SS-5;
- supervisory review of original SSN applications for U.S. born individuals over age 12; and,
- inspection of identity documents submitted by applicants through use of a visual standard and black light.

SSA Comment

We agree. Management reviews have been established in the LVSSCC to ensure compliance with all enumeration policies and procedures and to ensure the continued high quality and integrity of the LVSSCC work product.

Recommendation 2

Continue to monitor controls to ensure SSN applications for individuals with mailing addresses in the LVSSCC servicing area are processed by a card center rather than a FO.

SSA Comment

We agree. To ensure the integrity of the enumeration process, it is essential that the use of the Social Security Card Center be mandatory for all SSN applicants within its service area. Giving applicants an option of dealing with other Social Security field offices runs the risk of having persons planning to obtain a card

improperly go to facilities which might not be as effective in detecting fraudulent applications and documents. The NY SS-5 Assistant generates an onscreen alert when an interviewer outside of the card center enters address information for an applicant residing within the areas serviced by the center. Field office managers have been instructed to remind staff of the strict jurisdictional policies that require applicants to deal with the card center unless the application is being done in conjunction with a claim and/or other post-entitlement action. In addition, EM-06058, dated 09/19/06, was issued nationally to remind offices to follow the procedures in RM 00201.015 for referring individuals who are transacting Social Security Number business and who live in the geographic areas serviced by the Social Security Card Centers.

Recommendation 3

Continue to monitor procedures to ensure Social Security cards mailed to LVSSCC are properly controlled and safeguarded.

SSA Comment

We agree. While POMS provides specific instructions for completing the address field when a SSN card is to be mailed in care of a field office, POMS lacks any formal procedures that refer to the monitoring and control of SSN cards that are received in field offices (FO). In order to address the vulnerabilities associated with lack of records to document the receipt and disposition of SSN cards mailed to field offices, the San Francisco Region established a procedure for the receipt, control and disposition of SSN cards mailed to the FO. These procedures were instituted via a Regional Memorandum issued to all Region IX FOs on September 12, 2006.

OIG Contacts and Staff Acknowledgments

OIG Contacts

James J. Klein, Director, San Francisco Audit Division, (510) 970-1739

Jack H. Trudel, Audit Manager, (510) 970-1733

Acknowledgments

In addition to those named above:

Wilfred P.K. Wong, Auditor-in-Charge

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