
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**FOLLOW-UP: INDIVIDUALS RECEIVING
BENEFITS INAPPROPRIATELY UNDER MULTIPLE
SOCIAL SECURITY NUMBERS
AT THE SAME ADDRESS**

October 2011

A-01-10-11008

AUDIT REPORT



Mission

By conducting independent and objective audits, evaluations and investigations, we inspire public confidence in the integrity and security of SSA's programs and operations and protect them against fraud, waste and abuse. We provide timely, useful and reliable information and advice to Administration officials, 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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MEMORANDUM

Date: October 14, 2011

Refer To:

To: The Commissioner

From: Inspector General

Subject: Follow-up: Individuals Receiving Benefits Inappropriately Under Multiple Social Security Numbers at the Same Address (A-01-10-11008)

OBJECTIVE

The objective of our review was to identify and prevent individuals from inappropriately receiving Old-Age, Survivors and Disability Insurance (OASDI) benefits and Supplemental Security Income (SSI) payments under multiple Social Security numbers (SSN) at the same address.

BACKGROUND

In general, the Social Security Administration (SSA) assigns an individual only one SSN.¹ However, in some cases, because of fraud or staff mistakes, the Agency has assigned individuals more than one SSN. As a result, the Agency has controls in place to identify beneficiaries who may be receiving duplicate payments under different SSNs. Specifically, the Agency has the Master File Duplicate Detection Operation (MAFDUP) to identify beneficiaries who may be inappropriately receiving benefits on multiple OASDI records.² The Agency also has the Supplemental Security Income Duplicate Payment Project (SSIDPP) to identify recipients who may be inappropriately receiving benefits on multiple SSI records.³ (For more information on SSA's controls for detecting duplicate payments, see Appendix B.)

¹ Under certain circumstances, SSA may assign an individual more than one SSN, such as when the individual objects to certain numbers in his or her original SSN for religious or cultural reasons. SSA, POMS, RM 00205.040 (June 7, 2006).

² SSA, POMS, SM 04730.001 (July 8, 2003).

³ SSA, POMS, SI 02310.100 (May 27, 1999).

In our prior review, we identified almost \$9.2 million in overpayments to 220 beneficiaries who inappropriately received benefits under multiple SSNs at the same address.⁴

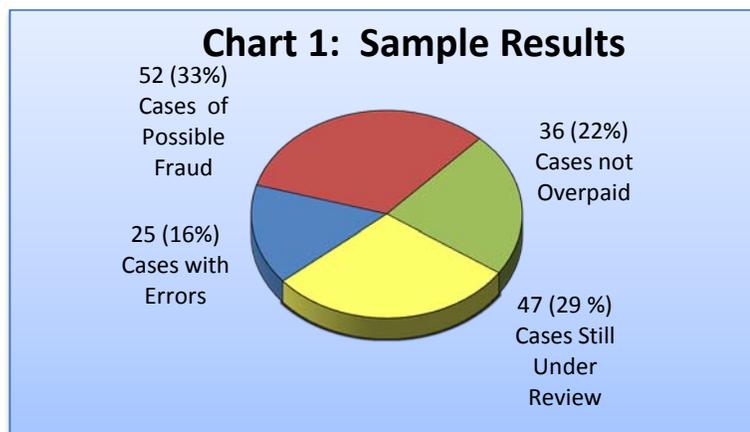
To perform our current review, we analyzed a file of OASDI and SSI beneficiaries who received benefits in January 2010. Based on our analysis of SSNs, address information, and other benefit information, we identified 160 beneficiaries who appeared to be inappropriately receiving benefits at the same address under at least two different SSNs. We referred these cases to SSA for review and appropriate action. (See Appendix C for additional information on our scope and methodology.)

RESULTS OF REVIEW

Based on our review, SSA assessed \$2.5 million in overpayments to 77 beneficiaries who inappropriately received benefits under multiple SSNs at the same address.⁵ Of these 77 cases, 52 involved possible fraud and 25 had administrative errors. Also, the Agency avoided paying an estimated \$528,655 by discontinuing these incorrect payments.⁶ Our Office of Investigations is reviewing the aforementioned cases of possible fraud as well as 47 other cases. Therefore, we expect the Agency to assess additional overpayments.

Specifically, of the 160 cases,

- 52 involved possible fraud, and SSA assessed \$2.2 million in overpayments;
- 47 were still under review as of September 2011 (in all these cases, SSA suspected fraud and referred them to our Office of Investigations);
- 25 had administrative errors, resulting in \$300,164 in overpayments; and
- 36 were not overpaid.⁷



⁴ SSA, Office of the Inspector General (OIG), *Individuals Receiving Benefits Under Multiple Social Security Numbers at the Same Address* (A-01-05-25002), April 2005.

⁵ As of September 2011, SSA had recovered \$110,779 of these overpayments (about 4 percent).

⁶ This is the amount SSA would have paid to the beneficiaries if the Agency had not stopped benefits based on action taken during our review. We calculated the savings by taking the last monthly overpayment received by the beneficiaries multiplied by 12 months.

⁷ Most of these cases represented different individuals, such as twins.

Table 1 summarizes the cases and overpayments by benefit type.

Table 1: Summary of Cases and Overpayments by Benefit Type								
	OASDI Only		SSI Only		OASDI and SSI		Total Cases and Overpayments	
Possible Fraud	16	\$1,061,786	4	\$32,910	32	\$1,097,472	52	\$2,192,168
Administrative Errors	10	\$176,578	6	\$67,383	9	\$56,203	25	\$300,164
Subtotal	26	\$1,238,364	10	\$100,293	41	\$1,153,675	77	\$2,492,332
Not Overpaid	12	\$0	7	\$0	17	\$0	36	\$0
Pending Review	24	-	6	-	17	-	47	-
Total Cases and Overpayments	62	\$1,238,364	23	\$100,293	75	\$1,153,675	160	\$2,492,332

Beneficiaries Overpaid Because of Possible Fraud

SSA staff—working with our Office of Investigations—determined that 52 beneficiaries were overpaid \$2.2 million because of possible fraud. The average overpayment amount was \$42,157, and the average number of months overpaid was 80 (about 7 years).

- SSA assigned a second SSN in 48 cases. In one case, SSA assigned the second SSN in 2008.⁸ For the remaining 47 cases, SSA assigned the second SSN before 2001. Since 2001, the Agency implemented several initiatives to protect the integrity of the SSN. For example, the Agency began requiring (1) mandatory interviews for all applicants for original SSNs who are over age 12 and (2) evidence of identity for all children, regardless of age.⁹ Also, the Agency established several Enumeration Centers that focus exclusively on assigning SSNs and issuing SSN cards. Additionally, the *Intelligence Reform and Terrorism Prevention Act of 2004* requires that SSA (1) verify birth records for any individual before assigning an original SSN and (2) tighten the minimum standards for documents that may be presented when applying for an original card.¹⁰

⁸ When the beneficiary was born in 2008, her parent completed an SSN application for her through SSA's Enumeration at Birth program—a program that provides SSNs through the birth registration process. Later, the beneficiary's parent went to an SSA field office and completed another SSN application for the beneficiary. For these applications, the parent used different last names for the child, which may have caused SSA to assign the beneficiary two different SSNs 1 week apart in 2008. For more information, see SSA OIG report, *Follow-up of the Enumeration at Birth Program* (A-08-06-26003), April 2006.

⁹ SSA, POMS, RM 10210.001 (January 7, 2010).

¹⁰ *The Intelligence Reform and Terrorism Prevention Act of 2004*, Pub. L. No. 108-458 § 7213, 118 Stat. 3638, 3830 – 3832 (2004).

- SSA established the second record in four cases by mistyping the SSN.¹¹ For instance, in one of the four cases, an SSI recipient's father moved out of the household. Since SSA could not update the existing record with this information, the Agency established a new record. When doing so, an Agency employee mistyped the SSN. As a result, the recipient was overpaid \$3,047 from August 2009 through May 2011.

Examples of the possible fraud cases follow.

- A New York resident began receiving SSI payments in October 1997 under one SSN while working and earning over \$30,000 a year, on average, under a second SSN. In January 2007, she stopped working and began receiving disability benefits under the second SSN. Since her earnings and disability benefits made her ineligible for SSI, she was overpaid \$103,774 from October 1997 through May 2011. Our Office of Investigations is investigating this case.
- A Tennessee resident obtained two SSNs using different names in 1962 and 2000. In February 2008, he began receiving widower's benefits under the second SSN. In March 2009, he began receiving retirement benefits under the first SSN. When he filed for his retirement benefits, he stated he was not receiving any other benefits—even though he was receiving widower's benefits at the time. He was overpaid \$18,468 from March 2009 through April 2011. Our Office of Investigations finished investigating this case.

Beneficiaries Overpaid Because of Administrative Errors

SSA staff determined that 25 beneficiaries were overpaid \$300,164 because of administrative errors and did not refer them to our Office of Investigations for possible fraud. The average overpayment amount was \$12,007, and the average number of months overpaid was 35 (about 3 years). Administrative errors included SSA staff keying errors and not cross-referencing records.

For example, in July 2009, a Florida resident began receiving children's benefits under one SSN and SSI payments under another SSN. Because SSA had not cross-referred the records, the recipient was overpaid \$2,148 from October 2010 through February 2011.

SSA Did Not Detect All Duplicate Benefits Paid Under Different SSNs

SSA's systems identify duplicate OASDI benefits and SSI payments by matching records on several items, including the beneficiaries' names. Therefore, if the last names are different, SSA is less likely to identify the duplicate payments through

¹¹ In these four cases, the Agency suspected fraud and referred them to our Office of Investigations.

SSIDPP and MAFDUP. Additionally, SSA did not have a system for identifying beneficiaries inappropriately receiving *both* OASDI benefits and SSI payments under different SSNs.¹²

Of the 77 individuals with overpayments, SSA's systems would not identify 63. Of these 63 beneficiaries:

- 22 received either OASDI benefits or SSI payments. SSA's systems would not identify these cases because they did not meet the systems' matching criteria. In most cases, the records did not match on the beneficiaries' last names.
- 41 received *both* OASDI benefits and SSI payments.

CONCLUSION AND RECOMMENDATION

We identified 77 beneficiaries who were overpaid \$2.5 million in benefits under multiple SSNs at the same address. Our Office of Investigations is reviewing 47 additional cases. Therefore, we expect SSA to assess additional overpayments. This represents a small fraction of the \$740 billion SSA paid to over 57 million beneficiaries in Fiscal Year 2010.¹³

To ensure all cases identified in this review are addressed, we recommend SSA staff work with our Office of Investigations and assess overpayments where appropriate.

AGENCY COMMENTS

SSA agreed with our recommendation. See Appendix E.



Patrick P. O'Carroll, Jr.

¹² In our prior review, we recommended SSA develop a match to identify and prevent beneficiaries inappropriately receiving both OASDI and SSI benefits under different SSNs. Although SSA agreed with this recommendation, the Agency did not implement it. See Appendix D for more information on the recommendations we made in our prior review.

¹³ SSA, *Performance and Accountability Report*, Fiscal Year 2010, page 7.

Appendices

APPENDIX A – Acronyms

APPENDIX B – The Social Security Administration’s Controls for Detecting Duplicate Payments

APPENDIX C – Scope and Methodology

APPENDIX D – Recommendations in Prior Review

APPENDIX E – Agency Comments

APPENDIX F – OIG Contacts and Staff Acknowledgments

Acronyms

MAFDUP	Master File Duplicate Detection Operation
MBR	Master Beneficiary Record
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
SSI	Supplemental Security Income
SSIDPP	Supplemental Security Income Duplicate Payment Project
SSN	Social Security Number
SSR	Supplemental Security Record
U.S.C.	United States Code

The Social Security Administration's Controls for Detecting Duplicate Payments

When an individual applies for Old-Age, Survivors and Disability Insurance (OASDI) benefits or Supplemental Security Income (SSI) payments, Social Security Administration (SSA) staff asks the person about any prior applications for benefits. This is to ensure that individuals who may be entitled on more than one record receive the correct amount. In addition, SSA runs computer matches to identify records that appear to be duplicates based on name, date of birth, and/or ZIP code. SSA personnel review the records to determine whether they relate to the same beneficiary, correct the benefit amounts (if necessary), and assess any overpayments.

OASDI

Under Title II of the *Social Security Act*, the OASDI program provides monthly benefits to retired or disabled workers and their families and to survivors of deceased workers.¹ An individual may be eligible for benefits on several records. For example, a person can be entitled to benefits on his own earnings record and on his spouse's record. Although entitled on both records, SSA procedures generally provide that only the higher benefit amount is payable.

To ensure individuals who are entitled to multiple OASDI benefits receive the correct payment amount, SSA developed systems to adjust, validate, and post accurate entitlement information on the Master Beneficiary Record (MBR) involved.² SSA has another control in place to detect duplicate OASDI benefits, the Master File Duplicate Detection Operation (MAFDUP). The Agency runs MAFDUP to detect records that match on several items, including first name, middle initial, last name, ZIP code, and date of birth. MAFDUP generates alerts at the appropriate SSA office for beneficiaries who may be receiving benefits under multiple SSNs.

¹ *Social Security Act* §§ 202(a) – (k), 42 U.S.C. §§ 402(a) – (k).

² SSA, POMS, SM 00823.001 (April 20, 2005).

SSI

Under Title XVI of the *Social Security Act*, the SSI program provides a minimum level of income to financially needy individuals who are aged, blind, or disabled.³ Generally, individuals may receive payment of both OASDI and SSI benefits under the same Social Security number⁴ as long as the combination of such benefits does not exceed the maximum SSI payment allowed.⁵

The Supplemental Security Record (SSR) exchanges information with other SSA systems to detect duplicate records and payments. When the system detects differences between the identity data from the SSR and other databases, it generates an automatic alert. SSA field office staff review the records, resolve any discrepancies, and make any necessary adjustments to the SSI payments.⁶

Additionally, SSA designed the SSI Duplicate Payment Project to reduce the possibility of a recipient receiving duplicate payments because of multiple SSI records.⁷ The Agency designed the project to identify cases that have matching names and the same date of birth. The project identifies cases that meet these criteria and transmits alerts to the appropriate SSA office to resolve the discrepancies.

³ *Social Security Act* § 1601, *et seq.*, 42 U.S.C. § 1381, *et seq.*

⁴ *Social Security Act* § 1612(a)(2)(B), 42 U.S.C. § 1382a(a)(2)(B).

⁵ *Social Security Act* § 1611(a)(1)(A), 42 U.S.C. § 1382(a)(1)(A).

⁶ SSA, POMS, SM 02001.001-.425.

⁷ SSA, POMS, SI 02310.100 (May 27, 1999).

Scope and Methodology

To accomplish our objective, we:

- Reviewed applicable sections of the *Social Security Act* and Social Security Administration (SSA) regulations, rules, policies, and procedures.
- Reviewed Office of the Inspector General report, *Individuals Receiving Benefits Under Multiple Social Security Numbers at the Same Address* (A-01-05-25002), April 2005.
- Obtained a file of Master Beneficiary Records (MBR) for all primary and auxiliary beneficiaries and Supplemental Security Records (SSR) for all Supplemental Security Income recipients who received benefits in January 2010.¹ We ran several matches on these files based on the following fields: 5-digit ZIP code; date of birth; first name; and first few characters of the street address. We compared these fields in the following files.
 - Records in the SSR.
 - Records in the MBR against the SSR.
 - Records in the MBR primary beneficiary file.
 - Records in the MBR primary beneficiary file against the MBR auxiliary beneficiary file.
 - Records in the MBR auxiliary beneficiary file.

We removed any cases where the benefits on one record were cross-referenced or accounted for on the other record—as these individuals were entitled on multiple records or were concurrent beneficiaries—and SSA has processes in place to ensure benefits are adjusted appropriately. In addition, we removed cases identified in our previous audits. We continued our review with any remaining instances where two or more cases matched on the fields listed above.

¹ A “primary beneficiary” is a numberholder entitled to benefits based on his/her own work record. An “auxiliary beneficiary” is someone entitled to benefits based on someone else’s work record, by virtue of relationship to the numberholder. SSA, POMS GN 03301.002 B (August 1, 2008).

We then obtained the Numident record for each beneficiary and compared the place of birth, parents' names, beneficiaries' full names, and any other information on the record to help determine whether the Social Security Numbers (SSN) belonged to the same person or different individuals, such as twins with similar names.² In addition, we reviewed the MBRs and SSRs to compare telephone numbers, bank account information, and any other information available to help in making the determination.

Through this additional analysis, we identified 160 cases where we believed individuals might be inappropriately receiving benefits under multiple SSNs at the same address. We referred these cases to SSA for review and requested that the Agency refer any instances of possible fraud to our Office of Investigations.

After obtaining feedback from SSA on our cases, we quantified the amount of overpayments assessed by the Agency. We also calculated future savings for the next 12 months where SSA stopped the improper payments.

We conducted our audit between July 2010 and September 2011 in Boston, Massachusetts. The entities audited were the field offices and program service centers under the Office of the Deputy Commissioner for Operations, and the Offices of Retirement and Survivors Insurance Systems, Disability Systems, and Applications and Supplemental Security Income Systems under the Deputy Commissioner for Systems. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We tested the data obtained for our audit and determined them to be sufficiently reliable to meet our objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

² The Numident Master File houses, in SSN order, the identifying information for each number holder. SSA, POMS, RM 10240.010 (April 26, 2010).

Recommendations in Prior Review

In our April 2005 review, *Individuals Receiving Benefits Under Multiple Social Security Numbers at the Same Address* (A-01-05-25002), the Social Security Administration (SSA) assisted us in identifying almost \$9.2 million in overpayments to 220 beneficiaries who inappropriately received benefits under multiple Social Security numbers (SSN) at the same address. Of these 220 cases, 182 involved possible fraud and 38 had administrative errors. When we issued the prior report, SSA and our Office of Investigations were working on 85 other cases. As a result, we recommended SSA:

1. Develop a match to identify and prevent beneficiaries inappropriately receiving both Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) benefits under different SSNs. SSA agreed and stated it was working internally with its systems staff to conduct an annual match, beginning in February 2006, to identify and prevent beneficiaries receiving both OASDI and SSI benefits under different SSNs at the same address. SSA also stated that it expected the match operation to be handled through the process known as “CATF,” where special programming requests are accomplished to assist with fraud investigative operations.

Current Status: SSA has not developed a match to identify beneficiaries receiving both OASDI and SSI benefits under different SSNs.

2. Ensure that all beneficiaries inappropriately receiving multiple OASDI benefits at the same address are identified and that appropriate action is taken. SSA agreed and stated that it had completed its review of the cases provided by the Office of the Inspector General (OIG) in January 2005 and took appropriate action on all beneficiaries identified as possibly receiving incorrect multiple benefits. Additionally, the Agency stated that, as a result of our review, it referred cases that involved possible fraud to OIG for investigation.

Current Status: SSA and our Office of Investigations finished working these cases.

3. Run the Supplemental Security Income Duplicate Payment Project (SSIDPP) more frequently than once per year.¹

Current Status: SSA began running the SSIDPP quarterly in January 2005.

¹ SSIDPP identifies recipients who may be inappropriately receiving benefits on multiple SSI records. SSA, POMS, SI 02310.100 (May 27, 1999).

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: August 31, 2011 Refer To: S1J-3

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

From: Dean S. Landis /s/
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Follow-up: Individuals Receiving Benefits Inappropriately Under Multiple Social Security Numbers at the Same Address"
(A-01-10-11008)—INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Frances Cord, at (410) 966-5787.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL, DRAFT REPORT,
"FOLLOW-UP: INDIVIDUALS RECEIVING BENEFITS INAPPROPRIATELY
UNDER MULTIPLE SOCIAL SECURITY NUMBERS AT THE SAME ADDRESS"
(A-01-10-11008)**

Recommendation

To ensure all cases identified in this review are addressed, we recommend SSA staff work with our Office of Investigations and assess overpayments where appropriate.

Response

We agree. We worked with your Office of Investigations and have completed reviewing all the cases identified in your report, assessing overpayments where appropriate. We consider this recommendation closed for tracking purposes.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Judith Oliveira, Director, Boston Audit Division

David Mazzola, Audit Manager

Acknowledgments

In addition to those named above:

Joe Cross, IT Specialist

Kevin Joyce, IT Specialist

Toni Paquette, Program Analyst

Katie Toli, Auditor

Charles Zaepfel, IT Specialist

For additional copies of this report, please visit our Website at <http://oig.ssa.gov/> or contact the Office of the Inspector General's Public Affairs Staff Assistant at (410) 965-4518. Refer to Common Identification Number A-01-10-11008.

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