



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

Impact of Undetected Marriages on Social Security Administration Payments

012317 April 2024



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: April 17, 2024

Refer to: 012317

To: Martin O'Malley
Commissioner

From: Gail S. Ennis
Inspector General

Subject: Impact of Undetected Marriages on Social Security Administration Payments

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration properly updated payment records to prevent improper payments when individuals changed their name because of marriage.

Please provide within 60 days a corrective action plan that addresses each recommendation. If you wish to discuss the final report, please call me or have your staff contact Michelle L. Anderson, Assistant Inspector General for Audit.

Attachment

Impact of Undetected Marriages on Social Security Administration Payments

012317



April 2024

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) properly updated payment records to prevent improper payments when individuals changed their name because of marriage.

Background

Marriage can impact a Supplemental Security Income (SSI) or Old-Age, Survivors, and Disability Insurance (OASDI) beneficiary's payment. We randomly selected 1 of 20 segments from the Supplemental Security Record (SSR) and Master Beneficiary Record (MBR). We identified 3 populations with name changes and sampled 250 individuals based on the methodology described in Appendix B.

1. Sample 1 comprised 100 of 4,382 SSI recipients.
2. Sample 2 comprised 75 of 1,055 SSI recipients with 1 recorded deemor. (SSA "deems" a portion of the income of an ineligible spouse or parent of a minor when it determines an individual's SSI eligibility or payment amount.)
3. Sample 3 comprised 75 of 1,048 OASDI beneficiaries.

Additionally, we obtained a file of 12,226 individuals who had a name change processed through SSA's Internet Social Security Number Replacement Card (iSSNRC) application from October 2022 (when SSA rolled this application out in certain states) through July 2023.

Results

SSA did not always take the necessary manual actions to properly update 38 of the 250 payment records for SSI recipients or OASDI beneficiaries when there was a name change because of marriage. Furthermore, SSA had not taken manual action on 11 SSI recipients or OASDI beneficiaries who changed their name via the iSSNRC application. We estimate SSA improperly paid 16,631 SSI recipients and OASDI beneficiaries approximately \$240.9 million when there was a name change because of marriage. Additionally, SSA paid an estimated \$18.9 million in unpreventable overpayments before the name changes. On average, SSA overpaid the SSI recipients and OASDI beneficiaries \$13,458 over 30.6 months since the date of a name change.

When a person changes their name, SSA systems do not automatically determine whether they are receiving benefits. SSA does not know about a marriage until an individual reports it. Once SSA is informed of an SSI recipient or OASDI beneficiary's marriage, employees must take manual actions to update the payment records. Yet, SSA did not always do this, which led to overpayments. SSA explored the feasibility of using electronic marriage data to determine if OASDI beneficiaries changed their marital status. However, not all states/jurisdictions have a central repository of electronic marriage data, and many do not require, or collect, the marriage applicants' Social Security number.

Recommendations

1. Review the 10 cases from Sample 1, the 20 cases from Sample 2, and the 8 cases from Sample 3 and take any necessary corrective actions.
2. Review the 11 iSSNRC cases and take any necessary corrective actions.
3. Evaluate the feasibility of implementing an alert system in other applications that flags an employee review of a marriage and action on the SSR or MBR, when applicable.
4. Evaluate the feasibility of obtaining electronic marriage data to match against SSI and OASDI payment records to prevent improper payments.

SSA agreed with Recommendations 1 through 3 and disagreed with Recommendation 4, citing state data limitations.

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ABBREVIATIONS

CDB	Childhood Disability Beneficiaries
C.F.R.	Code of Federal Regulations
iSSNRC	Internet Social Security Number Replacement Card
MBR	Master Beneficiary Record
NAPHSIS	National Association for Public Health Statistics and Information Systems
OASDI	Old-Age, Survivors, and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
SSNAP	Social Security Number Application Process
SSR	Supplemental Security Record
U.S.C.	United States Code

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) properly updated payment records to prevent improper payments when individuals changed their name because of marriage.

BACKGROUND

Marriage can impact a Supplemental Security Income (SSI) recipient's payments or Old-Age, Survivors, and Disability Insurance (OASDI) beneficiary's entitlement benefits.¹ SSA informs SSI recipients and OASDI beneficiaries of their reporting responsibilities—including the need to report a marriage—during the application process, in award letters, and in periodic correspondence.²

Supplemental Security Income

The SSI program provides a minimum level of income to individuals with low income and resources who are aged, blind, or disabled. SSA determines SSI payment amounts for married individuals who live in the same household as a couple and both receive SSI payments. If the SSI recipient's spouse is not receiving SSI, SSA evaluates the income and resources of the individual's ineligible spouse who lives in the same household in determining the individual's SSI payment amount. If the SSI recipient is a child and the parent(s) or parent and step-parent are not receiving SSI, and live in the same household, SSA evaluates the parent or step-parent's income and resources when it determines the child's SSI payment amount.³ SSA refers to this as deeming.⁴ Table 1 shows the types and number of SSI recipients who could be affected by marriage, including the average monthly payments and exceptions.

¹ To determine marital status under the *Social Security Act*, see SSA, *POMS*, GN 00305.005 (December 13, 2022). To determine whether two individuals who live in the same household are considered married for SSI purposes because they hold themselves out as a married couple to the community in which they live, see SSA, *POMS*, SI 00501.152 (January 5, 2024).

² SSA provides information on reporting responsibilities in such publications as *What You Need to Know When You Get Supplemental Security Income (SSI)*, Publication EN 05-11011 (May 2023); *What You Need to Know When You Get Social Security Disability Benefits*, Publication EN 05-10153 (April 2021); and *What You Need to Know When You Get Retirement or Survivors Benefits*, Publication EN-05-10077 (January 2024).

³ For the definition of a parent for deeming purposes, see SSA, *POMS*, SI 01310.145 (August 14, 2008).

⁴ 20 C.F.R. § 416.1160. SSI recipients must meet certain income and resource limits for eligibility. SSA presumes members of a family will use part of their income to meet some of an SSI recipient's needs when they live in the same household. Accordingly, SSA considers, or deems, a portion of certain family members' income when it determines whether an individual is eligible for SSI payments. Also, see SSA, *POMS*, SI 01310.001 (November 17, 2010).

Table 1: SSI Recipients Whose Benefits Could Be Affected by Marriage

Type of Recipient	Number of Recipients	Average Monthly Benefit ⁵	Exceptions
Eligible Individual with No Spouse	7,033,201	\$546	If an individual marries, income is not deemed from a spouse when the couple does not live together.
Child with One Parent in the Household	713,984	\$687	Income is not deemed from a step-parent if the natural or adoptive parent leaves the household or if the step-parent does not reside in the household.
Total	7,747,185		

Our prior work has identified improper SSI payments because of unreported marriages.

- In a 2008 report, we estimated 2,088 SSI recipients were overpaid approximately \$24.8 million because they did not report their marriages to SSA.⁶
- In a 2012 report, we estimated 900 SSI recipients were overpaid approximately \$8.2 million because they did not report their marriages to SSA.⁷

Old Age, Survivors, and Disability Insurance

The OASDI program provides benefits to wage earners and eligible family members in the event the wage earner retires, becomes disabled, or dies.⁸ Certain auxiliary and survivor beneficiaries⁹ must be unmarried to receive benefits.¹⁰ This applies to divorced spouses, children—including childhood disability beneficiaries (CDB), mothers/fathers, and parents, unless certain exceptions apply. Table 2 shows the types and number of OASDI beneficiaries whose benefits could be affected by marriage, including the average monthly benefits and exceptions.

⁵ The number of recipients and average monthly benefit are from SSA's *SSI Annual Statistical Report*, pp. 33, 35, and 57 (2021).

⁶ SSA, OIG, *Supplemental Security Income Recipient Marriages Not Reported to the Social Security Administration*, A-01-07-27109, p.3 (May 2008).

⁷ SSA, OIG, *Supplemental Security Income Recipient Who Did Not Report Their Marriage to the Social Security Administration*, A-01-10-11020, p.2 (April 2012).

⁸ 42 U.S.C. §§ 401, 402, and 423.

⁹ Auxiliary and survivor beneficiaries are children, widow(er)s, spouses, and parents who receive OASDI benefits based on another wage earner's Social Security record.

¹⁰ SSA, POMS, RS 00202.005 (August 23, 2023), RS 00203.035 (January 3, 2024), RS 00208.001 (February 23, 2012), RS 00208.010.(February 23, 2012), RS 00209.001, A (June 22, 2021) and RS 00209.005 (August 12, 2013).

Table 2: OASDI Beneficiaries Whose Benefits Could Be Affected by Marriage

Type of Beneficiary	Number of Beneficiaries	Average Monthly Benefit ¹¹	Exceptions – Benefits End with Marriage Unless the Marriage is to an Individual Entitled to:
Divorced Spouse	210,928	\$904	Widow(er)'s, mother's/father's, CDB, divorced spouse's, or parent's benefits. Note: When a divorced spouse remarries the Social Security number holder, benefits do not terminate.
Mother/Father	113,837	\$1,126	Retirement Insurance, Disability Insurance, CDB, divorced spouse's, widow(er)'s, mother's/father's, or parent's benefits.
Parent	917	\$1,393	CDB, divorced spouse's, widow(er)'s, mother's/father's, or parent's benefits.
Child/Student	783,371	\$826	No exceptions.
CDB	1,142,699	\$904	Social Security benefits other than a child beneficiary under age 18 or a child beneficiary age 18 or 19 entitled because they are a full-time student.
Total	2,251,752		

In an August 2022 report, SSA estimated it overpaid approximately \$1.7 billion in OASDI benefits from Fiscal Years 2017 through 2021, or \$346 million annually, because beneficiaries failed to report a marriage when it occurred.¹²

Agency Process When Recipients, Deemors, or Beneficiaries are Married or Request a Replacement Social Security Number Card Because of a Name Change

SSA relies on individuals to self-report marriage. SSI recipients must self-report changes that may affect their payment (such as marriage) within 10 calendar days after the month in which the change occurred.¹³ There is no timeframe in SSA policy for OASDI beneficiaries to report marriage information. If an individual contacts SSA to change their name, policy states SSA staff must ask the applicant requesting a name-change replacement Social Security number (SSN) card whether they are receiving SSI payments or OASDI benefits. If yes, staff should review and update the records as necessary.¹⁴

When an individual changes their name because of marriage, they must provide SSA evidence of marriage (such as the marriage certificate). When SSA receives the evidence, it updates the individual's Numident record (an SSA database that stores personally identifiable information for all SSN holders) using the SSN Application Process (SSNAP). In SSNAP, an alert message pops up when the name is updated (that is, the input name differs from the name on the

¹¹ The number of beneficiaries and average monthly benefit in this table are from SSA's *Annual Statistical Supplement to the Social Security Bulletin*, pp. 5.7 and 5.8 (2022).

¹² SSA, Office of Analytics, Review, and Oversight, *Title II Payment Accuracy Report Fiscal Year 2021*, pp. 10-11 (August 2022).

¹³ SSA, POMS, SI 02301.005, B.3 (December 20, 2023).

¹⁴ SSA, POMS, RM 10205.105 (August 31, 2009).

Numident). This alert states, “If the applicant is a [OASDI] or [SSI] beneficiary, . . . be sure to update the Master Beneficiary Record [MBR], Supplemental Security Record [SSR] . . . as appropriate. If entitlement to benefits may be affected due to marriage or divorce, develop accordingly.” The SSA employee should select the “OK” button to move forward in the application.

Beginning April 2022, individuals in certain states can apply online for a name change because of marriage through SSA’s internet Social Security Number Replacement Card (iSSNRC) application.¹⁵ For iSSNRC name changes, SSA verifies the marriage electronically with the National Association for Public Health Statistics and Information Systems (NAPHSIS).¹⁶ SSA placed a statement in iSSNRC that notifies customers that, if they receive benefits, they must contact their local SSA field office to report the marriage in addition to completing the iSSNRC transaction online, see Figure 1.

Figure 1: Interim Control for SSI Recipients, Deemors, and OASDI Beneficiaries Who Changed Their Name Through iSSNRC

Submitting a name change replacement SSN card request due to marriage in this system *may not* automatically update all of your records.

If you receive benefits, have a claim pending, or are serving as a representative payee for Social Security or Supplemental Security Income (SSI) benefits, you must report the marriage information promptly to your [local office](#) or call us at 1-800-772-1213, weekdays from 8:00 am to 7:00 pm (Eastern Time Zone). If you are deaf or hard of hearing, call TTY 1-800-325-0778. We will tell you how your benefits may be affected. Failure to report your marriage may result in an overpayment that must be repaid.

I understand if I receive benefits, I must report my marriage to my [local office](#).

¹⁵ In April 2022, SSA added a new feature to iSSNRC that enables applicants to request an SSN name change replacement card due to marriage. The capability was only available to users in Arkansas. Since then, SSA has expanded this. As of February 2024, the 17 states participating in iSSNRC were: Arkansas, Colorado, Georgia, Idaho, Kentucky, Maine, Maryland, Michigan, Missouri, Montana, Nebraska, North Dakota, Rhode Island, South Dakota, Virginia, Wisconsin, and Wyoming. SSA, POMS, RM 10205.630 (February 16, 2024).

¹⁶ NAPHSIS maintains vital record data—such as birth, death, and marriage—in the United States.

Methodology

To accomplish our objective, we randomly selected 1 of the 20 segments from the SSR and the MBR.¹⁷ We reviewed the following samples:

1. Randomly sampled 100 recipients from a file of 4,382 SSI recipients who were in current pay as of May 2023, age 16 or older, did not have a spouse on their SSR, and changed their name after their date of eligibility.
2. Randomly sampled 75 recipients from a file of 1,055 SSI recipients who were in current pay as of May 2023, were under age 18, and had only 1 deemor on the record who changed their name after the recipient's date of eligibility.
3. Randomly sampled 75 beneficiaries from a file of 1,048 OASDI beneficiaries who were in current pay as of May 2023, age 16 or older, received benefits as a divorced spouse, mother, father, parent, child, student, or CDB, and changed their name after their date of entitlement.¹⁸

Additionally, we obtained a file of 12,226 SSNs of individuals who had a name change processed through SSA's iSSNRC application from October 2022 (when SSA rolled out this online application in certain states) through July 2023. From this file, we identified 19 individuals who were in current pay status receiving SSI payments or OASDI benefits.

For the 3 samples and the 19 iSSNRC cases, we determined whether payment records were updated appropriately or any were overpaid because of the marriage. We reviewed information in SSA's systems and a third-party vendor's database to determine whether the name change was because of marriage and identify the spouse's name and SSN. SSA can use (but not solely rely on) the information from third-party vendors as a lead to develop a case and determine whether the person was, in fact, married (not separated/divorced or living in the same household). See Appendix A for more information on our scope and methodology.

RESULTS OF REVIEW

SSA did not always properly update payment records for SSI recipients or OASDI beneficiaries when there was a name change because of marriage. We estimate SSA potentially overpaid approximately 16,631 SSI recipients and OASDI beneficiaries \$240.9 million from the date SSA changed their or their deemors' names through September 2023. See Appendix B for our sample results and estimates.

¹⁷ The SSR is a file of all current and previously entitled SSI claimants. The MBR is a file of all current and previously entitled OASDI beneficiaries. The SSR and MBR are each divided into 20 equal segments that are separated based on the last 2 digits of the SSN. Because each segment contains similar characteristics, the characteristics of 1 segment are deemed to represent all 20 segments.

¹⁸ We did not include aged or disabled widows in our population because they have different rules for the effect of remarriage on entitlement, as described in POMS, RS 00207.003 (September 11, 2023).

Necessary Manual Actions for Payment Records After a Name Change Because of Marriage

SSA did not update the applicable payment records of 38 of the 250 sampled individuals where the individuals or their deemors' completed a name change via a paper application and 11 of the 19 individuals who changed their names through the iSSNRC application (see Table 3).

Table 3: Results for SSI Recipients, Deemors, and OASDI Beneficiaries

Populations	Individual Cases Reviewed	Individuals Potentially Improperly Paid ¹⁹	Improper Payments from Date of Name Change	Estimated Improper Payments from Date of Name Change for Total Populations
SSI Recipients (Sample 1)	100	10	\$108,161	\$94,791,940
SSI Deemors (Sample 2)	75	20	\$238,664	\$67,144,100
OASDI Beneficiaries (Sample 3)	75	8	\$282,496	\$78,948,220
Subtotal of Samples	250	38	\$629,321	\$240,884,260
iSSNRC	19	11	\$30,129	\$30,129
Total	269	49	\$659,450	\$240,914,389

On average, SSA potentially overpaid these 49 SSI recipients and OASDI beneficiaries \$13,458 for 30.6 months since the date of a name change.

Whether SSA processed the name change through SSNAP or iSSNRC, its systems did not automatically determine whether the individual changing their name was receiving SSI payments or OASDI benefits. Instead, SSA relied on the individual to self-report they were receiving SSI payments and/or OASDI benefits. According to SSA, employees in its Offices of Operations, Systems, and Retirement and Disability Policy met several times to discuss implementing a system that would automatically check whether the person changing their name was receiving benefits; and, if so, alert employees to take any necessary manual actions on the payment record. SSA stated it will pursue this when funding becomes available. Although SSA alerts employees to check whether the marriage affects SSI payments or OASDI benefits, there is no oversight to ensure the employees take the necessary manual steps to update the applicable payment records. Examples follow:

- A Pennsylvania woman began receiving SSI payments in 2006. In October 2018, she changed her name, and the Form SS-5, *Application for a Social Security Card*, showed she

¹⁹ Of the 269 cases reviewed, 49 had potential calculable improper payments, but the remaining 220 did not have calculable improper payments. These 220 individuals met an exception, did not change their name because of marriage, or we did not detect that they were overpaid. Of the 220 individuals who were not improperly paid, 90 were in Sample 1, 55 were in Sample 2, 67 were in Sample 3, and 8 were in the iSSNRC population.

was married in July 2018. SSA added her spouse's information to the marriage screen in its Consolidated Claims Experience application. However, SSA did not add her spouse to her SSR payment record to show she and her spouse were living in the same household. A third-party vendor's database suggested the spouse was living in the household, and SSA's earnings record showed he had earnings each year since the couple married in 2018 through 2022. These earnings, ranged from \$19,000 to over \$40,000, some of which should have been deemed to the recipient. We estimated a \$34,764 overpayment occurred for 55 months since the date of the name change.²⁰ SSA agreed with our conclusion; however, SSA would need to independently verify the information (instead of relying on the third-party database) before it adjusts the SSI payment and assesses any overpayment. Had SSA developed the case and updated the SSR when the recipient changed her name, it could have prevented most of the potential overpayment. We provided this case to SSA in July 2023; SSA added the spouse to the payment record in May 2023. However, as of January 2024, no action had been taken to update the payment record for previous months.

- An OASDI auxiliary beneficiary from Florida married in January 2014 and changed her name in April 2014. The marriage was a termination event, but SSA did not update her MBR. Since April 2014, SSA had overpaid the beneficiary \$82,878. SSA agreed with our conclusion. We provided this case to SSA in November 2023; and, as of January 2024, no action had been taken to update the payment record with the marriage information.
- In January 2023, an SSI recipient from Missouri changed her name via the iSSNRC application. SSA updated her Numident record to reflect her name change but did not update her SSR to include her spouse. SSA's Consolidated Claims Experience application noted, in July 2023, the recipient informed SSA she married in April 2021. However, the SSA employee only flagged that the recipient may be receiving an overpayment but did not take the manual steps to develop the case and update the SSR. Therefore, SSA continued overpaying the SSI recipient. Since her name change, SSA had overpaid her \$7,312. SSA agreed with our conclusion. We provided this case to SSA in November 2023; and, as of January 2024, SSA had taken no action to update the payment record with the marriage information.

Individuals Did Not Always Report Marriage, as Required

Individuals who receive SSI payments or OASDI benefits must inform SSA of any changes in their circumstances, including marriage, that may affect their payments/benefits. Whether or not SSI recipients or OASDI beneficiaries change their name after a marriage, they must report the marriage to SSA since it could affect their SSI payment amounts or OASDI benefits. SSA cannot control if, or when, a person notifies it of a marriage or decides to change their name. However, a name change can be used as an additional piece of evidence to determine whether an individual's SSI payment or OASDI benefit may have been affected by marriage.

For example, an SSI recipient from California was married in September 2017. The recipient did not notify SSA via a name change request until April 2018. Over the 8 months the recipient did not notify SSA, she accrued \$648 in overpayments that SSA could not prevent because it

²⁰ Using SSA's eComputations tool, we divided the spouse's earnings by 12 months to get a monthly amount. To calculate the actual overpayment, SSA would need to contact the recipient for more information on the spouse's income and resources.

was unaware of the marriage. We provided this case to SSA in July 2023, and it agreed that a review needed to be completed to add the spouse and his income and resources to the record.

We estimated the time between when a marriage occurred and when an SSI recipient or OASDI beneficiary reported it through a name change, which resulted in approximately \$18.9 million of unpreventable overpayments, see Table 4.

Table 4: Projected Financial Impact of Married Beneficiaries Whose Records Had Not Been Properly Updated

Population	Estimated Individuals Improperly Paid	Estimated Improper Payment from Date of Name Change	Estimated Improper Payments from Date of Marriage	Total Estimated Unpreventable Improper Payments (Column 4 less Column 3) ²¹
SSI Recipients	8,760	\$94,791,940	\$102,705,640	\$7,913,700
SSI Deemors	5,620	\$67,144,100	\$75,740,840	\$8,596,740
OASDI	2,240	\$78,948,220	\$81,303,560	\$2,355,340
iSSNRC	11	\$30,129	\$58,608	\$28,479
Total	16,631	\$240,914,389	\$259,808,648	\$18,894,259

Of the 49 SSI recipients and OASDI beneficiaries who were overpaid based on our analysis, 26 individuals or deemors reported their marriages within less than 2 months of the name change.²² However, 23 took 2 months or longer to report their marriages through a name change, see Table 5.

Table 5: Time for SSI and OASDI Beneficiaries to Report Marriage Information via a Name Change²³

Number of Months between Marriage and Name Change	Number of SSI Recipients or OASDI Beneficiaries with Improper Payments	Unpreventable Improper Payments (Between the Date of the Name Change and the Marriage)
Less than 2	26 (53%)	\$9,698 (13%)
2 to 5	12 (25%)	\$14,827 (19%)
6 to 12	5 (10%)	\$7,538 (10%)
13 to 24	3 (6%)	\$15,312 (20%)
25 to 48	2 (4%)	\$22,832 (30%)
Over 48	1 (2%)	\$6,287 (8%)
Total	49	\$76,493 (100%)

²¹ This estimate is based on the sample cases and iSSNRC cases found in Table 5.

²² SSI recipients must report changes that may affect their payment (such as marriage) within 10 calendar days after the month in which the change occurred per SSA, POMS, SI 02301.005, B.3 (December 20, 2023). There is no timeframe in SSA policy for OASDI beneficiaries to report marriage information.

²³ This includes the results from all three samples plus the iSSNRC cases.

Our conclusions do not include SSI recipients, deemors, or OASDI beneficiaries who may have been married but did not change their names. According to a Pew Research Center survey:

- 79 percent of women took their spouse's last names, and 5 percent hyphenated their names and
- 5 percent of men took their spouse's last name, and less than 1 percent hyphenated their names.²⁴

SSA stated it explored the feasibility of using the NAPHSIS marriage data to determine if OASDI beneficiaries had a change in their marital status. However, in December 2017, several limitations with the marriage data were noted, such as not all states/jurisdictions having a central repository of marriage data and many did not require or collect the marriage applicants' SSN. SSA's contract with NAPHSIS for iSSNRC is used for SSA's name-change process and is not sufficient for evaluating if SSI or OASDI payments need to be adjusted because of marriage.

CONCLUSIONS

Because SSA does not have access to all marriage information to match against the SSI and OASDI rolls, it is unable to determine if individuals are receiving the correct SSI payments or if their OASDI benefits should be terminated. Although a name change can be a lead for SSA to develop whether marriage affects an individual's SSI payment or OASDI entitlement, not all people change their names when they get married. Without the states providing SSA information on all marriages, SSA will need to continue relying on SSI recipient, deemor, and OASDI beneficiaries to self-report their marriage. Therefore, the overpayments we estimated may not be the entire picture, and additional overpayments may go undetected.

RECOMMENDATIONS

1. Review the 10 cases from Sample 1, the 20 cases from Sample 2, and the 8 cases from Sample 3 and take any necessary corrective actions.
2. Review the 11 iSSNRC cases and take any necessary corrective actions.
3. Evaluate the feasibility of implementing an alert system in other applications that flags an employee review of a marriage and action on the SSR or MBR, when applicable.
4. Evaluate the feasibility of obtaining electronic marriage data to match against SSI and OASDI payment records to prevent improper payments.

²⁴ Luona Lin, *About 8 in 10 Women in Opposite-Sex Marriages Say They Took Their Husband's Last Name*, Pew Research Center, September 7, 2023, pp. 1 and 2. The number of women and men in same-sex marriages in the sample were too small to analyze separately. The Pew Research Center describes itself as a non-partisan fact tank that informs the public about the issues, attitudes and trends shaping the world. The Pew Research center conducts public opinion polling, demographic research, content analysis and other data-driven social science research.

AGENCY COMMENTS

SSA agreed with Recommendations 1 through 3 but disagreed with Recommendation 4 (see Appendix C). Regarding SSA's disagreement with Recommendation 4, SSA stated there are significant limitations in the accessibility of state marriage information; not all states have a centralized repository of marriage data, and the states' capabilities to transmit electronic data vary greatly. SSA further stated that, although some of the states that participate in the iSSNRC application can provide an electronic yes/no of marriage details, many cannot send the detailed marriage data SSA would need to match against its payment records.

OFFICE OF THE INSPECTOR GENERAL RESPONSE

We estimated the time between when a couple marries and when an SSI recipient or OASDI beneficiary reported it through a name change, resulted in approximately \$18.9 million of overpayments. Of 49 SSI recipients and OASDI beneficiaries who were overpaid based on our analysis, 23 (47 percent) took 2 months or longer to report their marriage to SSA through a name change. While we recognize that limitations in state data exist, we continue to believe that pursuing data matching with states that have the available data would reduce improper payments.



Michelle L. Anderson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed applicable sections of the *Social Security Act* and Social Security Administration's (SSA) Program Operations Manual System.
- Randomly selected a sample of 1 of the 20 segments from the Supplemental Security Record (SSR) and the Master Beneficiary Record (MBR) and identified 3 populations.¹
 - Identified 4,382 Supplemental Security Income (SSI) recipients who were in current pay in May 2023, age 16 or older, did not have a spouse on their SSR, and changed their name after their date of eligibility. We reviewed a random sample of 100 records.
 - Identified 1,055 SSI recipients who were in current pay as of May 2023, under age 18, and had only 1 deemor on the record who changed their name after the recipient's date of eligibility. We reviewed a random sample of 75 records.
 - Identified 1,048 Old-Age, Survivors, and Disability Insurance (OASDI) beneficiaries who were in current pay in May 2023 on their MBR, age 16 or older, received benefits as a divorced spouse, mother, father, parent, child, student, or childhood disability beneficiary, and change their name after their date of entitlement. We reviewed a random sample of 75 records.
 - For each of the sample cases, we:
 - Reviewed Information in SSA's systems (such as the SSR, MBR, Consolidated Claims Experience, Numident, Social Security Number Application Process, etc.) and a third-party vendor's database to determine whether the name change was because of marriage and to identify the spouse's name and Social Security number (SSN).² We also determined whether it appeared the couple lived together and date of separation if applicable.
 - Determined the amount of potentially overpaid benefits since the dates of the marriage (if known) and the name change.
 - Counted the number of days between the marriage and the name change, divided the number of days by 30, and rounded down to the nearest whole number to calculate the number of months between the marriage and the name change.

¹ See Appendix B for more information on our sampling.

² SSA can use the information from third-party vendors as a lead to develop a case and determine whether the person was in fact married (not separated/divorced or not living in the same household).

- Obtained a file of 12,226 SSNs of individuals who had a name change processed through SSA's internet SSN Replacement Card (iSSNRC) application from October 2022 through July 2023 in participating states.
 - Compared the 12,226 SSNs to SSI recipients and OASDI beneficiaries in current pay status and identified 19 individuals. For these cases, we:
 - Reviewed information in SSA's systems (such as the SSR, MBR, Consolidated Claims Experience application, Numident, Social Security Number Application Process, etc.) and a third-party vendor's database to identify the spouse's name and SSN. We determined if the spouse received SSI or OASDI benefits.
 - Determined the amount of potentially overpaid benefits since the date of the marriage (if known) and since the date of the name change.
 - Counted the number of days between the marriage and the name change, divided the number of days by 30, and rounded down to the nearest whole number to calculate the number of months between the marriage and the name change.
- Provided the potential-error cases to SSA for its review and updated our analysis based on its feedback.
- Obtained information from SSA on its potential plans to move away from relying on SSI and OASDI beneficiaries' need to self-report their marriage.

We assessed the reliability of data obtained for our analysis by: (1) performing electronic testing, (2) tracing a random sample of data to source documents, and (3) reviewing existing information about the data. We determined the computer-processed data were sufficiently reliable to meet our objective.

The principal entity audited entity was the Office of Operations. We assessed the significance of internal controls necessary to satisfy the audit objective. This included an assessment of the five internal control components, including control environment, risk assessment, control activities, information and communication, and monitoring. In addition, we reviewed the principles of internal controls associated with the audit objective. We identified the following components and principles as significant to the audit objective.

- Component 3: Control Activities
 - Principle 10: Design Control Activities
- Component 4: Information and Communication
 - Principle 13: Use Quality Information

We conducted our review between May and December 2023. 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 believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix B – SAMPLING METHODOLOGY AND RESULTS

Sampling Methodology

We randomly selected 1 of the 20 segments from the Supplemental Security Record (SSR) and the Master Beneficiary Record (MBR) and established 3 Sampling Frames as detailed in Appendix A and Table B-1.

To conduct this review, we used a simple random sample statistical approach. This is a standard statistical approach used for creating a sample from a sampling frame completely at random. For Sampling Frame 1, we selected 100 beneficiaries to review. For Sampling Frames 2 and 3, we selected random samples of 75 beneficiaries for review. Each sample item had an equal chance of being selected throughout the sampling process, and the selection of one item had no impact on the selection of other items. Therefore, we were guaranteed to choose a sample that represented the sampling frame, absent human biases, and ensured statistically valid conclusions of, and projections to, the entire sampling frame under review. Our sampling approach for this review ensures our reported projections are statistically sound and defensible.

Table B-1: Sample Descriptions, Population Sizes, and Sample Sizes

Sample	Sample Descriptions	Population Size	Estimated Total Population (Population x 20 Segments) ¹	Sample Size
1	Supplemental Security Income (SSI) recipients who changed their name after their date of eligibility	4,382	87,640	100
2	SSI recipients whose deemor changed their name after the recipient's date of eligibility	1,055	21,100	75
3	Old-Age, Survivors, and Disability Insurance (OASDI) auxiliary or survivor beneficiaries receiving benefits as a divorced spouse, mother, father, parent, child, student, or childhood disability beneficiary, and change their name after their date of entitlement	1,048	20,960	75

¹ The SSR is a file of all current and previously entitled SSI claimants. The MBR is a file of all current and previously entitled OASDI beneficiaries. The SSR and MBR are each divided into 20 equal segments that are separated based on the last 2 digits of the Social Security number. One segment represents 5 percent of the total population of wage earners. Because each segment contains similar characteristics, the characteristics of 1 segment are representative of all 20 segments.

Sample Results and Projections

The Social Security Administration (SSA) did not properly update payment records to prevent improper payments for 10 SSI recipients who changed their name because of marriage. Projecting our sample results to the population of 87,640 recipients, we estimate SSA potentially overpaid 8,760 recipients \$94.8 million from the date of the name change. See Table B-2.

Table B-2: Sample 1: SSI Recipients Who were in Current Pay, Age 16 or Older, Did Not Have a Spouse on their SSI Payment Record, and Changed Their Name After Their Date of Eligibility

Description	Cases with Improper Payments	Improper Payment from Date of Marriage	Improper Payments from Date of Name Change
Sample Results	10	\$117,190	\$108,161
Point Estimate for 1 Segment	438	\$5,135,282	\$4,739,597
Projection – Lower Limit for 1 Segment	244	\$1,774,983	\$1,568,683
Projection – Upper Limit for 1 Segment	714	\$8,495,580	\$7,910,512
Estimated Total (Point Estimate x 20 Segments)	8,760	\$102,705,640	\$94,791,940

Note: All projections are at the 90-percent confidence level.

SSA did not properly update payment records to prevent improper payments for 20 of 75 sampled SSI children whose deemors changed their name because of marriage. Projecting our sample results to the population of 21,100 recipients, we estimate SSA potentially overpaid 5,620 SSI recipients \$67.1 million from the date of the name change. See Table B-3.

Table B-3: Sample 2: SSI Recipients Who Were in Current Pay, Under Age 18, Only Had One Deemor on their SSI Payment Record, and that Deemor Changed Their Name After the Recipient's Date of Eligibility

Description	Recipients with Improper Payments	Improper Payment from Date of Marriage	Improper Payments from Date of Name Change
Sample Results	20	\$269,221	\$238,664
Point Estimate for 1 Segment	281	\$3,787,042	\$3,357,205
Projection – Lower Limit for 1 Segment	198	\$1,949,037	\$1,693,499
Projection – Upper Limit for 1 Segment	379	\$5,625,047	\$5,020,911
Estimated Total (Point Estimate x 20 Segments)	5,620	\$75,740,840	\$67,144,100

Note: All projections are at the 90-percent confidence level.

SSA did not properly update payment records to prevent improper payments for 8 OASDI auxiliary or survivor beneficiaries who changed their name because of marriage. Projecting our sample results to the population of 20,960 beneficiaries, we estimate SSA potentially overpaid 2,240 OASDI beneficiaries \$78.9 million from the date of the name change. See Table B-4.

Table B-4: Sample 3: OASDI Beneficiaries in Current Pay; Age 16 or Older; Received Benefits as a Divorced Spouse, Mother, Father, Parent, Child, Student, or Childhood Disability Beneficiary; and Changed Their Name After Their Date of Entitlement

Description	Beneficiaries with Improper Payments	Improper Payments from Date of Marriage	Improper Payments from Date of Name Change
Sample Results for 1 Segment	8	\$290,924	\$282,496
Point Estimate for 1 Segment	112	\$4,065,178	\$3,947,411
Projection – Lower Limit for 1 Segment	59	\$993,740	\$923,302
Projection – Upper Limit for 1 Segment	190	\$7,136,616	\$6,971,519
Estimated Total (Point Estimate x 20 Segments)	2,240	\$81,303,560	\$78,948,220

Note: All projections are at the 90-percent confidence level.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: April 12, 2024

Refer To: TQA-1

To: Gail S. Ennis
Inspector General

From: Dustin Brown *Dustin Brown*
Acting Chief of Staff

Subject: Office of the Inspector General Draft Report "Impact of Undetected Marriages on Social Security Administration Payments" (012317) – INFORMATION

Thank you for the opportunity to review the draft report. We agree with recommendations 1 through 3.

We need to disagree with recommendation 4 based on significant limitations in the accessibility of State marriage information. Not all States have a centralized repository of marriage data, and the capabilities of individual States to transmit electronic data vary greatly. For example, even though the States that participate in the name change process through the internet Social Security Number Replacement Card application can provide an electronic yes/no verification of marriage details, many of them are not able to send us the detailed marriage data we would need to match against our payment records. We are exploring automation enhancements and reviewing agency procedures to improve the accuracy and efficiency of our processes, promote program integrity, and prevent improper payments.

Please let me know if I can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.

**Mission:**

The Social Security Office of the Inspector General (OIG) serves the public through independent oversight of SSA's programs and operations.

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**National Association for Public Health Statistics and Information Systems
(Naphsis) Statement**

The statement on the following pages is in response to the audit, Impact of Undetected Marriages on Social Security Administration Payments, 012317, that was submitted by The National Association for Public Health Statistics and Information Systems (Naphsis) on May 20, 2024 pursuant to Pub. L. No. 117- 263, § 5274. The attached statement does not reflect the findings, conclusions, or opinions of the SSA OIG.

Naphsis Response

IMPACT OF UNDETECTED MARRIAGES ON SOCIAL SECURITY ADMINISTRATION PAYMENTS (012317)

May 19, 2024 – The National Association for Public Health Statistics and Information Systems (Naphsis) is the non-profit national membership organization for Vital Records and Health Statistics (VRHS) offices across the United States (US) and represents the common needs of all 57 in a complex balancing act between administrative and statistical needs. Members of Naphsis include state, territorial and city jurisdictions (50 states, American Samoa, Guam, the Commonwealth of the Northern Marianas Islands, Puerto Rico, US Virgin Islands, New York City, and the District of Columbia). It is important to note that marriage and divorce data are not always categorized as vital records data due to varying jurisdictional laws. It is also important to note that Naphsis does not own or maintain vital records data. The data are owned and maintained by the individual vital records jurisdictions. Naphsis provides systems to support secure data exchange between jurisdictions and with federal data users.

Naphsis appreciates the opportunity to respond to the report issued by OIG regarding improper payments due to marriage. There has not been a national coordinating agency requesting detailed marriage or divorce data since National Centers for Health Statistics (NCHS) stopped collecting the demographic data in January 1996 and instead only collects counts of these events.¹ The last national standard for marriage data was issued in 1989.² Due to the lack of federal interest in the collection and maintenance of this data, its accuracy varies across the nation. Even more so due to the varying levels of state collection and maintenance of this data, as some states have counties or more local municipalities delegating what information is pertinent to collect and maintain. Some of this data is not even within the vital records agency's purview and instead sits with the court system due to the legal process for dissolution. Of note, this report only addresses marriage data, yet divorce data is just as imperative to this data lifecycle.

Naphsis understands and supports the agency comments regarding the challenges with the current data landscape, yet also supports the intentions of the office of the inspector general to pursue data matching with states to reduce improper payments. An investment today in a national data standard for marriage data will be beneficial in the long term, especially as the need for accurate marriage data continues to grow. The only way to improve data quality is through long-term continued federal funding of vital records offices and ongoing coordination with the jurisdictions through Naphsis.

Naphsis supports an initiative to determine specific standards related to the collection of marriage and divorce data. The data currently collected has been sufficient to support jurisdictions participating in a marriage verification project specific to name changes for SSA. It would be worth exploring the viability of additional use cases based on this success.

1. Centers for Disease Control and Prevention. (n.d.). **Marriage and divorce**. National Center for Health Statistics. Retrieved May 15, 2024, from <https://www.cdc.gov/nchs/nvss/marriage-divorce.htm#:~:text=Information%20on%20the%20total%20numbers,suspended%20beginning%20in%20January%201996>.
2. National Center for Health Statistics. (2000). **Vital statistics of the United States: Marriage, divorce, and remarriage** (DHHS Publication No. (PHS) 2000-1120). Centers for Disease Control and Prevention. Retrieved May 15, 2024, from https://www.cdc.gov/nchs/data/misc/hb_marr.pdf.

Corrections

Footnote 16 on page 4 incorrectly states “Naphsis maintains vital record data” when it is Naphsis members, the vital records offices, who maintain vital record data for our nation. Naphsis is the membership association for vital records offices and their employees, and at the request of our members, Naphsis maintains systems that connect the federated system of vital records data, but Naphsis does not maintain the data itself. There is also a typo in the word States on this footnote.

Current:

¹⁶ NAPHSIS maintains vital record data—such as birth, death, and marriage—in the United States.

Correction:

¹⁶ Naphsis’ members maintain vital record data—such as birth, death, and in some cases, marriage—in the United States.

The second paragraph on page 9 incorrectly identifies ‘NAPHSIS marriage data,’ insinuating that the data belongs to Naphsis, but Naphsis does not own or maintain any vital records data, its members do. Not all jurisdictions’ vital records offices have ownership over the marriage or divorce data, there are additional data stewards.

Current:

SSA stated it explored the feasibility of using the NAPHSIS marriage data to determine if OASDI beneficiaries had a change in their marital status.

Correction:

SSA stated it explored the feasibility of using the marriage data from the Naphsis member jurisdictions to determine if OASDI beneficiaries had a change in their marital status.

Naphsis has onboarded an additional 4 jurisdictions, so footnote 15 could be updated with the new jurisdiction participants:

Current:

¹⁵ In April 2022, SSA added a new feature to iSSNRC that enables applicants to request an SSN name change replacement card due to marriage. The capability was only available to users in Arkansas. Since then, SSA has expanded this. As of February 2024, the 17 states participating in iSSNRC were: Arkansas, Colorado, Georgia, Idaho, Kentucky, Maine, Maryland, Michigan, Missouri, Montana, Nebraska, North Dakota, Rhode Island, South Dakota, Virginia, Wisconsin, and Wyoming. SSA, POMS, RM 10205.630 (February 16, 2024).

Update:

¹⁵ In April 2022, SSA added a new feature to iSSNRC that enables applicants to request an SSN name change replacement card due to marriage. The capability was only available to users in Arkansas. Since then, SSA has expanded this. As of May 2024, the 20 states participating in iSSNRC were: Arkansas, Colorado, Delaware, Georgia, Hawaii, Iowa, Idaho, Kentucky, Maine, Maryland, Michigan, Missouri, Montana, Nebraska, North Dakota, Rhode Island, South Dakota, Virginia, Wisconsin, and Wyoming. SSA, POMS, RM 10205.630 (February 16, 2024).

CONCLUSIONS

Naphsis provides systems on behalf of the nation’s vital records offices and continues to evolve their systems for modernization efforts in the public health sector that align with our member agency needs. Collaborative efforts regarding data standards for marriage data could bring the data’s quality to a place it needs to be to help reduce improper payments due to a change in marital status.