



# Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

## *Audit Report*

### Numberholders Age 100 or Older Who Did Not Have Death Information on the Numident

*A-06-21-51022 | July 2023*



# Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

## MEMORANDUM

**Date:** July 31, 2023

**Refer to:** A-06-21-51022

**To:** Kilolo Kijakazi  
Acting Commissioner

**From:** Gail S. Ennis *Gail S. Ennis*  
Inspector General

**Subject:** Numberholders Age 100 or Older Who Did Not Have Death Information on the Numident

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration had effective controls to annotate death information on the Numident records of numberholders who exceeded maximum reasonable life expectancies.

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

# Numberholders Age 100 or Older Who Did Not Have Death Information on the Numident

## A-06-21-51022



July 2023

Office of Audit Report Summary

### Objective

To determine whether the Social Security Administration (SSA) had effective controls to annotate death information on the Numident records of numberholders who exceeded maximum reasonable life expectancies.

### Background

SSA matches death reports it receives from various sources against its payment records and records dates of death on the Numident, an electronic file that contains personally identifiable information for each person issued a Social Security number (SSN). SSA uses Numident information to create its full file of death information we refer to as the full Death Master File (DMF). SSA shares the full DMF, as authorized, with Federal benefit-paying agencies.

In our March 2015 review of *Numberholders Age 112 or older Who Did Not Have a Death Entry on the Numident, A-06-14-34030*, we found SSA had not established controls to annotate death information on the Numident records of 6.5 million numberholders who exceeded maximum reasonable life expectancies and were likely deceased. Therefore, the numberholders' information did not appear in the DMF. SSA agreed to explore the feasibility of an automated process to update the millions of Numident records for individuals age 112 or older. We expanded the scope of this review to include numberholders age 100 or older.

### Results

SSA has not established controls to annotate death information on the Numident records of numberholders who exceeded maximum reasonable life expectancies. SSA added death information to the Numident records of approximately 1.5 of the 6.5 million numberholders age 112 or older discussed in our 2015 report. However, at the time of our review, although the Census Bureau estimated approximately 86,000 individuals residing in the United States were age 100 or older, SSA's Numident included approximately 18.9 million numberholders who were born in 1920 or earlier but had no death information on their Numident record. Death information missing from the Numident and the DMF hampers both SSA and Government-wide efforts to prevent and detect fraud and misuse.

In Tax Years 2016 through 2020, employers and individuals reported approximately \$8.5 billion in wages, tips, and self-employment income using 139,211 SSNs assigned to individuals age 100 or older. SSA transferred these earnings to the Earnings Suspense File, primarily because personally identifiable information provided on the workers' earnings reports did not match information in SSA enumeration records. Resolving these discrepancies will help improve the accuracy and completeness of the DMF and prevent future misuse of these SSNs.

The Department of the Treasury operates the Do Not Pay portal as part of a Government-wide initiative to prevent and detect improper payments. SSA will begin sharing its full DMF with the Do Not Pay initiative in December 2023. Taking action to include death information for the millions of numberholders omitted from the DMF would enhance Government-wide improper payment prevention and detection.

### Recommendations

We recommended SSA (1) use death information already in its records to input death information on 2.5 million numberholders' Numident records, (2) use death information in Centers for Medicare & Medicaid Services and various state death data files to input death information on approximately 498,000 Numident records, and (3) develop a methodology to add death information to the Numident records of the approximately 15.8 million remaining non-current payment status beneficiary numberholders identified by our audit. SSA disagreed with our recommendations.

## TABLE OF CONTENTS

Objective.....	1
Background.....	1
Results of Review .....	2
More than 18 Million Deceased Numberholders' Information Is Missing from the Death Master File .....	2
The Agency Decided Not to Address These Discrepancies.....	5
Preventing and Detecting Fraud and Misuse.....	5
Do Not Pay.....	5
Earnings After Death .....	6
Conclusions .....	6
Recommendations .....	6
Agency Comments.....	7
OIG Response .....	7
Appendix A – Scope and Methodology .....	A-1
Appendix B – Agency Comments.....	B-1

## **ABBREVIATIONS**

DMF	Death Master File
OIG	Office of the Inspector General
Pub. L. No.	Public Law Number
SSA	Social Security Administration
SSN	Social Security Number
U.S.C.	United States Code

## OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) had effective controls to annotate death information on the Numident records of numberholders who exceeded maximum reasonable life expectancies.

## BACKGROUND

SSA matches death reports it receives from various sources against its payment records and inputs death information on the Numident, an electronic file that contains personally identifiable information for each person issued a Social Security number (SSN). SSA uses Numident information to create its full file of death information we refer to as the full Death Master File (DMF), which it shares, as authorized, with Federal benefit-paying agencies<sup>1</sup> to assist with the prevention and detection of fraud. SSA also provides a subset of the full file, known as the public or the Limited Access DMF, to the Department of Commerce, which, in turn, sells the data to public and private customers.<sup>2</sup> Financial institutions process financial, credit, payment, and other applications against the file to help prevent and identify fraud. Agency officials noted that SSA collects death information to administer its programs, not as a comprehensive accounting of all deaths in the country.

In 2015,<sup>3</sup> we reported that SSA had not established controls to annotate death information on the Numident records of numberholders who exceeded maximum reasonable life expectancies of age 112 or older and were likely deceased. At the time, only 35 known living individuals worldwide were age 112 or older, however, SSA's Numident included 6.5 million numberholders<sup>4</sup> age 112 or older whose record did not contain death information. Therefore, the numberholders' information did not appear in the full DMF. We recommended SSA add death information to approximately 1.5 million Numident records where the numberholders' death information appeared in SSA payment records. We also recommended SSA determine whether it could efficiently correct the approximately 5 million remaining records. SSA agreed to explore the legal and technical feasibility, as well as the cost, to establish an automated process to update the millions of Numident records for individuals who appeared to be alive and age 112 or older, but ultimately decided not to update these records.

The U.S. Census Bureau estimated that, as of June 2021, approximately 86,000 individuals residing in the United States were age 100 or older.<sup>5</sup> We expanded the scope of this review to

---

<sup>1</sup> Includes the Internal Revenue Service, Department of Veterans Affairs, Department of Agriculture, Department of Defense, Centers for Medicare & Medicaid Services, Office of Personnel Management, Pension Benefit Guaranty Corporation, Federal Retirement Thrift Investment Board, and the Railroad Retirement Board,

<sup>2</sup> The public/Limited Access DMF excludes state death data. *Social Security Act*, § 205 (r), 42 U.S.C. § 405 (r).

<sup>3</sup> SSA, OIG, *Numberholders Age 112 or older Who Did Not Have a Death Entry on the Numident*, A-06-14-34030 (March 2015).

<sup>4</sup> During our current review, we determined that data used for the 2015 audit were incomplete because it inadvertently included only those numberholders whose Numident record included an iteration containing entry code-type of record established "L" (life claim filed before March 1972) or "D" (death claim filed before March 1972).

<sup>5</sup> U.S. Census Bureau *Monthly Postcensal Resident Population, 1/1/2021 to 6/1/2021* (est2022-alldata-r-file03.csv).

include numberholders age 100 or older.<sup>6</sup> See Appendix A for information on our scope and methodology.

## RESULTS OF REVIEW

SSA has not established controls to annotate death information on the Numident records of numberholders who exceeded maximum reasonable life expectancies. While SSA has added death information to the Numident records of approximately 1.5 of the 6.5 million numberholders age 112 or older discussed in our 2015 report, at the time of our review, approximately 18.9 million numberholders born in 1920 or earlier did not have death information on their Numident record and were not included in any version of the DMF.

Agency officials noted that, as of March 2023, SSA had issued approximately 531 million unique SSNs, and the 18.9 million records represent approximately 3.6 percent of all Numident records. Officials also noted that almost none of the 18.9 million numberholders currently receive SSA payments.<sup>7</sup>

However, when a deceased numberholder's Numident record does not contain death information, the numberholder's information does not appear in the DMF. As a result, DMF users would not know these individuals are deceased. Further, in December 2023, SSA is required to begin providing the Department of the Treasury with the full DMF to support Treasury's Do Not Pay Initiative. Millions of deceased numberholders' information missing from the DMF could result in erroneous payments by Federal benefit-paying agencies that use the DMF to detect inaccurate or unreported deaths. The missing information can also hinder private industry as well as state and local governments' ability to use the DMF to prevent identity fraud.

### More than 18 Million Deceased Numberholders' Information Is Missing from the Death Master File

SSA's Numident includes 18.9 million numberholders who have dates of birth in 1920 or earlier but no corresponding death information on their Numident record (see Table 1).

**Table 1: Years of Birth for 18.9 Million Numberholders Born in 1920 or Earlier Who Have No Death Information on their Numident Record**

Year of Birth	Numberholders (millions)
1899 or Earlier	10.9
1900 - 1906	2.3
1907 - 1913	2.4
1914 - 1920	3.2
<b>TOTAL</b>	<b>18.9*</b>

\*Difference due to rounding

<sup>6</sup> We initiated this review in 2021 and included all numberholders age 100 or older as of December 2020.

<sup>7</sup> At the time of our review, approximately 44,000 of the 18.9 million numberholders were receiving SSA payments.

While the Numident did not contain death information for 18.9 million numberholders born in 1920 or earlier, SSA records indicate most of the numberholders were deceased. Examples are provided below.

- Approximately 3 million numberholders' death information is currently available to SSA, including death information already appearing in 2.5 million numberholders' SSA records.
  - The Numident contains death information for approximately 1.7 million numberholders who obtained multiple SSNs. SSA was aware it issued these individuals multiple SSNs and cross-referred their Numident records.<sup>8</sup> SSA had received the numberholder's death information and input it on one Numident record but did not input the death information on the cross-referred record.<sup>9</sup> For example, SSA issued two SSNs to a man born in 1901 and cross-referred the Numident records. In 1988, SSA received and input death information on one Numident record but did not record the death information on the cross-referred record.
  - SSA terminated payments to approximately 623,000 beneficiaries and input death information in its payment records but did not input the death information on the Numident.<sup>10</sup> For example, a retirement beneficiary born in 1917 died in April 2005. SSA terminated her payments and input her date of death in her payment record; however, SSA did not input the death information on the Numident.
  - SSA had input dates of death in the Primary segment of approximately 144,000 wage earners' Master Beneficiary Records<sup>11</sup> but had not input the death information on the Numident. Because the numberholders were not listed as beneficiaries on these payment records, the numberholders' names and dates of birth generally did not appear on these records. For example, a numberholder born in 1895 died in 1956. SSA issued survivors benefits to his widow until her death in 1973. SSA input the numberholder's month and year of death on the Primary segment of his payment record but did not input the death information on the Numident.

---

<sup>8</sup> When SSA knowingly issues an individual more than one SSN, it cross-refers the Numident records so earnings can be properly credited to the individual's earnings record.

<sup>9</sup> We also identified these cases as part of our review of *Cross-referred Social Security Numbers, A-06-13-23091 (July 2017)* and recommended that SSA determine the feasibility of adding death information to the Numident records of non-current payment status beneficiary numberholders whose SSNs were cross referred to another Numident records containing the numberholders' death information. SSA agreed with the recommendation.

<sup>10</sup> We completed a series of prior audits that compared death information on deceased beneficiaries' and recipients' payment records with death information on the Numident, including the most recent *Follow-up on Deceased Beneficiaries and Recipients with No Death Information on the Numident, A-09-20-50936 (May 2022)*.

<sup>11</sup> The deceased individuals generally were not listed as beneficiaries on their payment records because SSA created the records to issue survivor benefits to the deceased wage earners' family members. This figure is significantly lower than the 1.4 million cases identified during our 2015 review.



- Approximately 498,000 numberholders’ death information is available in Centers for Medicare & Medicaid Services’ and/or various state death data files used during prior audits.<sup>12</sup>
- Only approximately 1.1 million numberholders have a Master Beneficiary Record (MBR) or Supplemental Security Record (SSR),<sup>13</sup> and most of these records already contain the numberholders’ death information. The MBR and SSR are SSA’s electronic records that contain information about all numberholders who have filed or received OASDI benefits, SSI payments, Medicare benefits, Black Lung benefits, or Railroad Retirement Board benefits since the 1970s. The fact that about 17.8 million numberholders age 100 or older have not filed for or received any of these Federal benefits since the 1970s<sup>14</sup> indicates they are deceased.
- Approximately 18.4 million (98 percent) numberholders are not currently receiving SSA payments and have not had earnings reported to SSA in the past 50 years (see Table 2). The fact that these individuals were age 100 or older, had no earnings in the past 50 years, and received no SSA payments indicates they are deceased.

**Table 2: Most Recent Tax Year of Earnings Reported to SSA for 18.9 Million Numberholders Age 100 or Older with No Death Information on the Numident**

Tax Year	Numberholders (millions)
None	7.0
1937 - 1950	7.6
1951 - 1972	3.9
1973 - 2021	0.4
<b>TOTAL</b>	<b>18.9</b>

- Approximately 13.3 million numberholders have dates of birth in 1906 or earlier. According to the Gerontology Research Group, the world’s oldest living person<sup>15</sup> was born in February 1907 and resides in Spain. Therefore, the Numident includes records for 13.3 million “living” numberholders, who, if actually alive would be older than the world’s oldest known living person.
- Approximately 6.2 million numberholders’ Numident records contained transaction codes indicating SSA issued the SSNs to process benefit claims filed by the numberholders or their family members *before* March 1972. The fact these numberholders were at least

<sup>12</sup> Examples include *Match of Centers for Medicare & Medicaid Services Death Information Against Social Security Administration Records, A-06-18-50653* (August 2021); *Match of California Death Information Against Social Security Administration Records, A-06-18-50706* (September 2021); and *Match of Ohio Death Information Against Social Security Administration Records, A-06-18-50768* (November 2020).

<sup>13</sup> Includes the 44,000 numberholders receiving SSA payments at the time of our review, the 623,000 numberholders with death information on their payment records, and the 144,000 numberholders with death information on the Primary segment of their MBRs.

<sup>14</sup> Before the creation of electronic payment records, SSA tracked payments via paper records. It is possible these numberholders filed for/received benefits but died prior to the creation of electronic payment records.

<sup>15</sup> As of January 2023.

100-years-old and their SSNs were associated with benefit claims—including death benefit claims—filed before 1972, yet most had no MBR or SSR and almost none were in current payment status, indicates the numberholders are deceased.

We believe it likely SSA did not receive or record most of the 18.9 million individuals' death information primarily because the individuals died decades ago—before the use of electronic death reporting. Resolving these discrepancies will improve the accuracy and completeness of the DMF.

## **The Agency Decided Not to Address These Discrepancies**

In response to our 2015 report, SSA considered multiple options, including adding presumed death information to these Numident records. SSA ultimately decided not to proceed because the “. . . options would be costly to implement, would be of little benefit to the agency, would largely duplicate information already available to data exchange consumers and would create cost for the states and other data exchange partners.”<sup>16</sup> SSA also believed a regulation would be required to allow it to add death information to these records, and adding presumed death information to the Numident would increase the risk of inadvertent release of living individuals' personal information in the DMF.

We note that, as of January 2023, the full DMF included death information on approximately 137 million deceased numberholders. Over 18 million missing death records represents more than 10 percent of the records in the full DMF. Therefore, the death information SSA currently provides Federal benefit-paying agencies--and will begin providing to the Department of the Treasury's Do Not Pay initiative in December 2023--to help prevent improper payments to deceased individuals, omit information for more than 1 of every 10 deceased numberholders.

## **Preventing and Detecting Fraud and Misuse**

Death information missing from the Numident and the DMF hampers both SSA and Government-wide efforts to prevent and detect fraud and misuse.

### ***Do Not Pay***

The Department of the Treasury's Bureau of Fiscal Services operates the Do Not Pay portal as part of a Government-wide initiative to prevent and detect improper payments. SSA officials stated that Treasury purchases the Limited Access DMF from the Department of Commerce for use in preventing payments to deceased individuals. However, the *Consolidated Appropriations Act of 2021*<sup>17</sup> includes a requirement for SSA to share its full DMF (including state death records) with the Do Not Pay initiative beginning in December 2023. Taking action to include death information for the millions of numberholders omitted from the DMF would enhance Government-wide improper payment prevention and detection.

---

<sup>16</sup> SSA, *Improving the Completeness of our Historical Death Data Summary Report – November 2015*. SSA estimated that adding a presumed death indication to the Numident would require 39-54 Systems Work Years and cost between \$5.5 and \$9.7 million to implement.

<sup>17</sup> Pub. L. No.116-260, December 27, 2020.

## ***Earnings After Death***

In Tax Years 2016 through 2020, employers and individuals reported approximately \$8.5 billion in wages, tips, and self-employment income using 139,211 SSNs assigned to individuals age 100 or older. SSA transferred these earnings to the Earnings Suspense File primarily because personally identifiable information provided on wage reports did not match information in SSA enumeration records. One SSN appeared on 405 different suspended wage reports, and 210 additional SSNs appeared on at least 50 suspended wage reports SSA received during this 5-year period.

SSA receives earnings reports from employers and records valid earnings on its Master Earnings File. To determine the validity of an earnings report, SSA compares the name and SSN to information on the Numident. If the earner's name is different than the name on the Numident, SSA transfers the earnings to its Earnings Suspense File. If the numberholder is deceased, SSA codes the earnings as *earnings after death*.

SSA investigates and attempts to resolve earnings after death by sending notices to employers, employees, and self-employed individuals. If the employer states the individual works for them but does not provide adequate information to resolve the issue, SSA sends a notice to the employee requesting that he/she contact SSA to correct the earnings information. If SSA can resolve the earnings, it records the wages to the proper SSN. If the employer informs SSA the individual is deceased, SSA instructs the employer to refund the employee's share of the Social Security taxes to the employee's estate or next of kin. Because the Numident did not contain death information for these numberholders, SSA did not consider these as *earnings after death* or investigate or attempt to resolve the possible misuse of these SSNs. Resolving these discrepancies will help prevent future misuse of these SSNs.

## **CONCLUSIONS**

SSA has not established controls to annotate death information on the Numident records of numberholders who exceeded maximum reasonable life expectancies. Our audit revealed that the Numident includes approximately 18.8 million more "living" numberholders age 100 or older than the U.S. Census Bureau estimates are alive and residing in the United States. Any deceased numberholder whose death is not recorded on the Numident will not appear in the DMF. As a result, Federal and private entities that use SSA's death information to assist in the prevention and identification of fraud would not know these individuals are deceased.

## **RECOMMENDATIONS**

We recommend SSA:

1. Use the death information already in its records to input death information on 2.5 million numberholders' Numident records.
2. Use death information in Centers for Medicare & Medicaid Services and various state death data files to input death information on approximately 498,000 Numident records.
3. Develop a methodology to annotate death information onto the Numident records of the approximately 15.8 million remaining non-current payment status beneficiary numberholders identified by our audit.

## AGENCY COMMENTS

SSA disagreed with our recommendations. Agency officials stated that most of the records discussed in the report involve numberholders who do not currently receive SSA payments, and that correcting records for non-beneficiaries would divert resources from work necessary to administer and manage its programs. Officials noted that since our 2015 audit, SSA has expanded use of Electronic Death Registration, improved the Death Information Processing System, and used historical death information already in its systems to post dates of death to over 10.7 million Numident records, including over 6 million records for individuals over age 112.

SSA determined that updating death information for the approximately 18.8 million additional numberholders, based on our three recommendations, poses a significant risk of recording incorrect death information on the Numident, would have limited or no benefit to the administration of SSA programs, and would be costly to implement. SSA officials suggest that other entities who rely on SSA's death data could consider taking steps for individuals presumed deceased based on age. See the full text of the Agency's comments in Appendix B.

## OIG RESPONSE

While we agree that adding presumed death information to these records will result in incorrect *dates of death* appearing on these Numident records, we do not agree it poses a significant risk of erroneously recording death information on living numberholders' records. For example, we see little risk in adding presumed death information to the millions of Numident records belonging to individuals born in the 1800s who haven't worked or received SSA payments in more than 50 years.

SSA determined the estimated \$5.5 to \$9.7 million in expenditures to correct these errors was too costly to implement and that the effort would have limited benefit to the administration of SSA programs. We acknowledge that almost none of the numberholders discussed in the report currently receive SSA payments. However, SSA issued each of these individuals a valid SSN and these SSNs could allow for a wide range of potential abuse.

The report discusses employers' use of more than 100,000 of these SSNs to report the payment of more than \$8 billion in wages. We also note we initiated our 2015 review upon the receipt of information that a man opened several bank accounts using SSNs belonging to numberholders born in the 1800s who had no death information on the Numident. In addition to being used to obtain employment or open bank accounts, identity thieves can potentially use these SSNs to create synthetic identifies, obtain credit, government benefits, or private insurance. Including these records in the DMF would alert users to the suspect nature of activities occurring under these SSNs.

SSA suggests entities that rely on SSA's death data independently consider taking steps to presume death for the aged individuals in their own databases. While SSA had access to each numberholders' birth information when it issued these SSNs, it is not clear the entities that rely on SSA's death data have access to accurate birth information, which would be required to make such determinations.



Michelle L. Anderson  
Assistant Inspector General for Audit

# ***APPENDICES***

## Appendix A – SCOPE AND METHODOLOGY

---

To accomplish our objective, we:

- Reviewed pertinent sections of the Social Security Administration's (SSA) policies and procedures as well as other relevant Federal laws and regulations.
- Reviewed relevant Office of the Inspector General reports.
- Identified numberholders whose Numident date of birth was in 1920 or earlier but whose Numident record did not contain a death entry (date of death). We then:
  - matched the Social Security numbers (SSN) against SSA's Earnings Suspense Files (both wages and self-employment);
  - identified numberholders who had either a Master Beneficiary or Supplemental Security Record that contained a death entry;
  - determined whether the numberholders had earnings posted on the Master Earnings File. If so, we identified (1) the most recent year of earnings and (2) numberholders with wages posted in at least 1 Tax Year from 2016 through 2020;
  - identified numberholders who were in current payment status on either the Master Beneficiary or Supplemental Security Record;
  - matched the SSNs against SSA's Multiple Social Security Number Cross-Reference File and identified cross-referred Numident records containing a death entry; and
  - matched the SSNs against Centers for Medicare & Medicaid Services' death data, state death records, and Electronic Death Registration death data. We verified approximately 1 million matching records through SSA's Enumeration Verification System.

We conducted our audit in Dallas, Texas, from September 2021 to May 2023. We determined the data used for this audit were sufficiently reliable to meet our audit objective. The primary entities audited were the Offices of the Deputy Commissioners for Systems and Operations. We did not independently review the overall system of internal controls. However, 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 Component and two Principles as significant to the audit objective.

- **Component 3: Control Activities**
  - Principle 10: Design control activities
  - Principle 12: Implement control activities

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 objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Appendix B – AGENCY COMMENTS

---



### SOCIAL SECURITY

#### MEMORANDUM

Date: July 12, 2023

Refer To: TQA-1

To: Gail S. Ennis  
Inspector General

From: Scott Frey   
Chief of Staff

Subject: Office of the Inspector General Draft Report, "Numberholders Age 100 or Older Who Did Not Have Death Information on the Numident" (A-06-21-51022) - INFORMATION

Thank you for the opportunity to review the draft report. Please see our comments to your recommendations in the attachment document.

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

Attachment



**SSA COMMENTS ON THE OFFICE OF INSPECTOR GENERAL DRAFT REPORT  
“NUMBERHOLDERS AGE 100 OR OLDER WHO DID NOT HAVE DEATH  
INFORMATION ON THE NUMIDENT” (A-06-21-51022)**

**GENERAL COMMENTS**

We collect death data to ensure the records on which we base eligibility and payment decisions are as accurate and consistent as possible for current and future beneficiaries. When we receive a report of death, we take timely action to terminate payments. The records identified by OIG involve non-beneficiaries and do not involve improper payments. Correcting records for non-beneficiaries would divert resources from work necessary to administer and manage our programs, which we cannot afford.

Although our records are not a comprehensive accounting of all deaths in the country, we continually improve death information to support program integrity and prevent improper payments. Since OIG’s 2015 audit, “Numberholders Age 112 or Older Who Did Not Have a Death Entry on the Numident” (A-06-14-34030), we have:

- Expanded the use of Electronic Death Registration to receive death data directly from all 50 states and 4 jurisdictions (New York City, the District of Columbia, Puerto Rico, and the Northern Mariana Islands);
- Improved the Death Information Processing System to ensure we input accurate death information; and
- Used historical death information and information already in our payment records to post dates of death to over 10.7 million Numident records, including over 6 million records for individuals aged 112 or older. We thoroughly screen historical death records prior to annotating death data to the Numident. Our current process ensures that we do not post incorrect information to our records.

We note our responses to the recommendations below.

**Recommendation 1**

Use the death information already in its records to input death information on 2.6 million numberholders’ Numident records.

**Response**

We disagree. OIG included these records in prior audit recommendations, and we have addressed them. Through our analysis, we determined that updating death information on these records poses a significant risk of recording incorrect death information on the Numident.

**Recommendation 2**

Use death information in Centers for Medicare & Medicaid Services (CMS) and various state death data files to input death information on approximately 498,000 Numident records.

## **Response**

We disagree. We regularly receive death information from CMS through a data exchange. CMS is a third-party reporter, which means we must verify any death information we receive from CMS prior to recording the data in our records.

We have made significant progress posting death data from “various state death data files.” To reduce the risk of recording incorrect death information, we established stringent screening criteria to select records for update. Upon completion of an extensive data analytics review, cases that do not meet our screening criteria are excluded from the updates. As we receive original State files, we will add historical State death information that meets our screening criteria.

## **Recommendation 3**

Develop a methodology to annotate death information onto the Numident records of the approximately 15.8 million remaining non-current pay beneficiaries identified by our audit.

## **Response**

We disagree. While we understand OIG’s assumption that these individuals are likely deceased, we do not have death information for these individuals. Therefore, we are unable to record the information on these non-beneficiary Numident records. As noted in the report, we previously attempted to develop a methodology to annotate death information on the Numident for non-beneficiaries who have exceeded maximum reasonable life expectancy; however, we found that the possible solutions would have limited or no benefit for the administration of our programs and were too costly to implement. Other entities who rely on death data could consider taking steps for individuals presumed deceased based on age.



- Mission:** The Social Security Office of the Inspector General (OIG) serves the public through independent oversight of SSA's programs and operations.
- Report:** Social Security-related scams and Social Security fraud, waste, abuse, and mismanagement, at [oig.ssa.gov/report](https://oig.ssa.gov/report).
- Connect:** [OIG.SSA.GOV](https://oig.ssa.gov)

Visit our website to read about our audits, investigations, fraud alerts, news releases, whistleblower protection information, and more.

Follow us on social media via these external links:



Twitter: @TheSSAOIG



Facebook: OIGSSA



YouTube: TheSSAOIG



Subscribe to email updates on our website.