



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

Processing Non-citizens' Original Social Security Numbers Electronically Through Enumeration Programs

A-08-22-51136 September 2023



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: September 20, 2023

Refer to: A-08-22-51136

To: Kilolo Kijakazi
Acting Commissioner

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

Subject: Processing Non-citizens' Original Social Security Numbers Electronically Through Enumeration Programs

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration's policies and procedures prevented it from assigning multiple Social Security numbers to non-citizens who applied for original numbers through the Enumeration at Entry and Enumeration Beyond Entry processes.

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

Processing Non-citizens' Original Social Security Numbers Electronically Through Enumeration Programs

A-08-22-51136



September 2023

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration's (SSA) policies and procedures prevented it from assigning multiple Social Security numbers (SSN) to non-citizens who applied for original numbers through the Enumeration at Entry (EAE) and Enumeration Beyond Entry (EBE) processes.

Background

In Calendar Year (CY) 2021, SSA assigned approximately 4.9 million original SSNs. Of those, SSA assigned approximately 588,000 original SSNs to EAE and EBE participants.

The EAE program was set up through a Memorandum of Understanding (MOU) with the U.S. Departments of Homeland Security (DHS) and State (State) to assist SSA in enumerating non-citizens DHS admitted as lawful permanent residents.

Likewise, SSA's MOU with DHS' U.S. Citizenship and Immigration Services provides SSA information necessary to enumerate non-citizens via the EBE process for those who qualify.

We reviewed the approximately 4.9 million original SSNs SSA assigned in CY 2021 to determine whether SSA assigned multiple SSNs to non-citizens. We used computer software to identify potential matches then manually reviewed to ensure they were matches.

Results

SSA correctly processed and assigned SSNs to approximately 587,000 (99.8 percent) non-citizens who applied through EAE and EBE in CY 2021. However, SSA technicians improperly processed and assigned multiple SSNs to 1,185 (less than 1 percent) non-citizens who participated in these processes.

Of the 1,185 multiple SSNs assigned, SSA technicians should have processed 840 as a request for a replacement card. However, technicians input the applications in the enumeration system as original SSN requests. These applications contained the same first name, alien registration number, and date of birth yet SSA assigned multiple SSNs.

In addition, for the 1,185 multiple SSNs assigned, the system alerted technicians there was a potential matching record for 1,027. SSA's system control also compares the incoming SSN application information to existing Numident records. If the system identifies a potential match, it places the application in a pending status, sends an alert to field office technicians, and provides information from the existing records. Assigning multiple SSNs to the same person increases the risk of overpayments to beneficiaries.

Finally, 65,902 (1.3 percent) of the approximately 4.9 million original applications received in CY 2021 had "unknown" recorded in the (1) Mother's Name, (2) Father's Name, and (3) City of Birth fields. SSA depends on DHS and State to provide the data it needs to process SSN applications and support the integrity of the information it retains to ensure an effective enumeration process.

Recommendations

We made five recommendations to SSA, including cross-referring the 1,185 individuals' SSN records and enhancing controls on technician actions and data received via these processes.

SSA agreed with Recommendations 1 and 2 and disagreed with Recommendations 3 through 5.

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ABBREVIATIONS

ARN	Alien Registration Number
CY	Calendar Year
DHS	U.S. Department of Homeland Security
DOB	Date of Birth
EAE	Enumeration at Entry
EBE	Enumeration Beyond Entry
FO	Field Office
IOM	International Organization for Migration
MOU	Memorandum of Understanding
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSN	Social Security Number
State	U.S. Department of State

OBJECTIVE

To determine whether the Social Security Administration's (SSA) policies and procedures prevented it from assigning multiple Social Security numbers (SSN) to non-citizens who applied for original numbers through the Enumeration at Entry (EAE) and Enumeration Beyond Entry (EBE) processes.

BACKGROUND

The SSN allows employers to identify and record individuals' earnings and helps SSA track earnings, determine eligibility for benefits, and pay correct benefit amounts.¹ SSA also uses the SSN to monitor an individual's record once benefits begin. The card issued when SSA assigns an SSN is called the original card. Subsequent cards issued from the same SSN account are called replacement cards. In Calendar Year (CY) 2021, SSA assigned approximately 4.9 million original SSNs: 224,000 to EAE participants and 364,000 to EBE participants.

The EAE program was set up through a Memorandum of Understanding (MOU) with the U.S. Departments of Homeland Security (DHS) and State (State) to assist SSA in enumerating non-citizens DHS has admitted as lawful permanent residents. If a non-citizen wishes to apply for an original or replacement SSN card under EAE, State collects enumeration data during the non-citizen visa process and electronically transmits the data to DHS.² The data elements collected are the same as those SSA requests from non-citizens when they file for an SSN at an SSA field office (FO) or card center.³ Similarly, SSA's MOU with DHS' U.S. Citizenship and Immigration Services⁴ provides SSA information necessary to enumerate, through the EBE process, non-citizens who live in the United States; need to obtain an original SSN or replacement card; and are applying with either Form I-766, *Employment Authorization Document*, or Form I-551, *Permanent Resident Card*.⁵

Under EAE and EBE, DHS electronically transmits to SSA the data it needs to process and assign SSNs.⁶ Once SSA's enumeration system processes the SSN application data, SSA mails the SSN card to the address on the application. The EAE and EBE processes eliminate the need for non-citizens to visit an SSA FO to file applications for original or replacement SSNs. SSA's enumeration system has controls in place to determine whether an original SSN should be assigned.

¹ Testimony of Sean Brune, Deputy Commissioner for Systems and Chief Information Officer: Hearing on the Social Security Administration's Role in Combatting Identity Fraud Before the House Committee on Ways and Means, Subcommittee on Social Security, 118th Congress p. 1 (2023).

² SSA, *POMS*, RM 10205.600, A (September 30, 2020). EAE became effective October 2002 for non-citizens who are age 18 or older and DHS lawfully admitted at entry into the United States as permanent residents.

³ In this report, FO includes field offices and card centers.

⁴ For purposes of this report, we use DHS to collectively refer to its services and those under U.S. Citizenship and Immigration Services when we discuss the administration of the EBE.

⁵ SSA, *POMS*, RM 10205.700, A (August 13, 2021). EBE became effective October 2017 for non-citizens who were applying for an Employment Authorization Document and has since expanded to include applicants for a Lawful Permanent Resident Card.

⁶ SSA refers to its enumeration system as the Social Security Number Application Process.

SSA's enumeration system will not process an application for an original SSN if it identifies data on SSA records that closely match⁷ data on the incoming application. Instead, the system generates an alert that notifies FO technicians there may be existing SSNs that require their review and resolution before further action can be taken on the application. FO technicians resolve these alerts by comparing the information from the list of possible SSNs to the incoming SSN application. If technicians determine the applicant has an SSN, SSA can issue a replacement SSN card. If the technician does not find an existing SSN record, in most situations, SSA will assign an original SSN.

We reviewed the approximately 4.9 million original SSNs SSA assigned in CY 2021 to determine whether SSA assigned multiple SSNs to non-citizens.⁸ We used computer software to identify potential matches then manually reviewed to verify they were matches. We reviewed data elements including the applicant's name, date of birth (DOB), alien registration number (ARN), place of birth, and mothers' names. We reviewed the data for these matches to determine whether SSA's system alerted technicians of potential matches and evaluated the data SSA received. See Appendix A for more information on our scope and methodology. See Appendix B for information on SSA's assistance with SSN cards for non-citizens the United States admitted under Operations Allies Welcome.

RESULTS OF REVIEW

SSA correctly processed and assigned SSNs to approximately 587,000 (99.8 percent) non-citizens who applied through EAE and EBE in CY 2021. However, SSA technicians improperly processed and assigned multiple SSNs to 1,185 (less than 1 percent) non-citizens who participated in these processes.⁹

SSA requires that technicians search for existing SSN records if an individual applies for an original SSN at an FO. Of the 1,185 multiple SSNs assigned, SSA technicians should have originally processed 840 as a request for a replacement card.¹⁰ There was enough similar matching information between incoming FO applications and existing SSN records. However, technicians input the applications into the enumeration system as original SSN requests. For example, one EBE application showed the applicant's last name as "Perez Ramirez," but the SSA office application showed the last name as "Perez." For these applications, the applications contained the same first name, ARN, and DOB, yet SSA assigned multiple SSNs.

⁷ When the enumeration system generates an alert, it lists the potential matches, which includes the numberholders' identifying information in SSA's records. This is designed to prevent issuing multiple SSNs to the same non-citizen.

⁸ In SSA's May 2023 evaluation of *Multiple SSNs Assigned via EBE Workload*, SSA reviewed Fiscal Years 2021 through 2022. SSA's review included all our audit population in its review.

⁹ Before our review, SSA identified an additional 311 non-citizens with multiple SSNs assigned in CY 2021 and cross-referenced their information in its records. Additionally, in SSA's May 2023 evaluation of *Multiple SSNs Assigned via EBE Workload*, SSA identified 3,336 cases from the EBE process where SSA potentially assigned 2 SSNs to the same person. Of the 3,336 cases SSA identified, we identified 638 as having more than 1 SSN assigned.

¹⁰ SSA could not identify the remaining 345 non-citizens because the second application was not filed at an FO.

SSA's system also compares the incoming SSN application information to existing Numident records. If the system identifies a potential match, it places the application in a pending status, sends an alert to FO technicians, and provides information from the existing records. For the 1,185 multiple SSN assignments, the system alerted technicians there was a potential matching record for 1,027. Assigning multiple SSNs to the same person increases the risk of overpayments to beneficiaries.

SSA depends on DHS and State to provide the data it needs to process SSN applications and support the integrity of the information it retains to ensure an effective enumeration process. We observed 65,902 (1.3 percent) of the approximately 4.9 million original applications received in CY 2021 had "unknown" recorded in the (1) Mother's Name, (2) Father's Name, and (3) City of Birth fields. Additionally, SSA's enumeration system did not recognize matches for 158 non-citizens who received multiple SSNs because key data fields in the applications and established enumeration records were dissimilar.

Technicians' Searches for Existing Social Security Number Records

FO technicians did not find that an SSN record existed for 840 (71 percent) of the 1,185 non-citizens whom SSA assigned multiple SSNs. The 840 non-citizens applied for an SSN through EAE or EBE and later visited an FO. When an individual applies for an SSN at an FO, SSA technicians must verify their identity and determine whether SSA has previously assigned them an SSN.

- SSA's EAE¹¹ policy instructs technicians to search for the applicant's name and DOB via Alpha-Index¹² queries to avoid assigning multiple SSNs.
- SSA's EBE¹³ policy instructs technicians to search by name and DOB via ALPHIDENT¹⁴ query.
- SSA instructs technicians to search by the name and DOB via Alpha-Index when an in-person interview is required for an SSN.

Of the 840 non-citizens, 788 (94 percent) had matching ARNs on both SSN applications (1 application submitted via EAE or EBE and the other at an FO). The remaining 52 non-citizens had matching, or closely matching, names and/or dates of birth. We believe a revision to policy that ensures technicians first search non-citizens' ARN via ALPHIDENT to identify existing SSN records could reduce instances where multiple SSNs are assigned. If the ARN search produces no matches, SSA should require an Alpha-Index query by name and DOB. This would allow the technician to quickly determine that a non-citizen already has an assigned SSN and should be issued a replacement SSN card.

¹¹ Non-citizens applying via EAE typically present evidence of identity via a Machine Readable Immigrant Visa with temporary I-551 language evidencing permanent residence for 1 year or an I-551 *Permanent Resident Card*. SSA, POMS, RM 10205.600, C (September 30, 2020) and RM 10211.025, C.2 (September 10, 2021).

¹² The Alpha-Index is an online query request screen that searches SSA's master file.

¹³ Non-citizens applying via EBE typically present evidence of identity via Form I-766, *Employment Authorization Document*. SSA, POMS, RM 10205.700, C (August 13, 2021).

¹⁴ This Web-based query searches by name and DOB, ARN, or Birth Certificate Number if the SSN is unknown.

Technicians' Processing of System Alerts

FO technicians also improperly cleared system-generated alerts for 1,027¹⁵ (87 percent) of the 1,185 non-citizens. When SSA's enumeration system identifies information on an incoming SSN application, matches, or closely matches, information in SSA's Numident,¹⁶ it places the application in a pending status and alerts technicians to review the potential matches to determine whether an original or replacement SSN card should be issued. For these 1,027 non-citizens, there was enough similar information between records that technicians should have recognized the established SSN record and application data belonged to the same non-citizen and issued a replacement card instead of assigning an original SSN.

Technicians' failure to thoroughly review the potential matching SSNs the system identified resulted in SSA improperly clearing alerts and assigning a second SSN. Technicians improperly clearing these alerts continues to be a finding in our enumeration audits.¹⁷ Multiple SSNs create a risk of improper payments. For example, in a prior audit, we determined SSA improperly paid approximately \$46.9 million to 724 beneficiaries who received benefits under multiple SSNs for various reasons including individuals using multiple SSNs, identity theft, and administrative errors.¹⁸ To reduce multiple SSN assignments caused by technicians improperly clearing alerts, SSA should implement a control to ensure employees follow policy when they clear alerts that would result in the system assigning individuals another SSN or other control to prevent the assignment of multiple SSNs.

Enumeration Data Received from the U.S. Departments of Homeland Security and State

SSA's enumeration system uses DHS and State information to assign SSNs to EAE and EBE participants. An addendum to the MOU between SSA and DHS states the applicant's city of birth and parents' names are required fields;¹⁹ however, in the EBE process, SSA allows the system to accept "unknown" in these fields. Of the approximately 4.9 million enumeration records from CY 2021, 65,902 (1.3 percent) original applications had "unknown" in the (1) Mother's Name, (2) Father's Name, and (3) City of Birth fields.²⁰ Only 29 of these applications were completed in SSA offices, and 65,873 (greater than 99.9 percent) were completed through the EBE process.

¹⁵ Of the 1,027 EMs generated, 952 had matching ARNs on the FO application and the previously established SSN record.

¹⁶ The Numident houses the identifying information for each individual who is assigned an SSN.

¹⁷ SSA, OIG, *Multiple Social Security Numbers Assigned to Non-citizens Using the Enumeration Beyond Entry Program*, A-08-18-50472, p. 3 (December 2019); *Follow-Up: Assessment of the Enumeration at Entry Process*, A-08-07-17143, p. 5 (March 2008); and *Assessment of the Enumeration at Entry Process*, A-08-04-14093, p. 4 (March 2005).

¹⁸ SSA, OIG, *Follow-up: Individuals Who Inappropriately Received Benefits Under Multiple Social Security Numbers*, A-01-16-50075, pp. 2 and 4 (April 2019).

¹⁹ *Addendum to Memorandum of Understanding Between the Social Security Administration and the Immigration and Naturalization Service (Department of Homeland Security) (U.S. Citizenship and Immigration Services)*, DHS, SSA, June 14, 2021.

²⁰ We notified DHS' Inspector General to this problem with the data SSA received from DHS.

SSA requested DHS collect and provide these data elements as agreed, but this has not resolved the problem with recording “unknown” for applicants’ city of birth and/or parents’ names. SSA considers the name, DOB or age, gender, and parents’ names helpful in establishing applicants’ identity. SSA’s continued acceptance of “unknown” when the information is available could affect its employees’ resolution of alerts, which could result in multiple SSN assignments.

Additionally, SSA’s enumeration system did not recognize matches for 158 non-citizens who received multiple SSNs. This occurred because key data fields from their applications and established enumeration records were dissimilar. For example, the ARNs for 155 (98 percent) of these non-citizens’ enumeration records did not match. We identified occurrences where DHS entered non-citizens’ first, middle, and/or last name fields differently from that on SSA’s FO application. For example, one EBE application showed the applicant’s last name as “Franco Gomez,” but the FO application showed the last name as “Franco.” We also observed instances where a non-citizen’s DOB month and day were reversed. Such discrepancies prevented SSA’s enumeration system from identifying possible matches and generating alerts. The enumeration system cannot determine whether an applicant may already be assigned an SSN and generate an alert when there is not enough matching, or closely matching, information on the new application and a previously established SSN record.

The MOU SSA and State signed in 1996 and the addendum to the MOU SSA and DHS signed in 2021 identify the data fields to collect and transmit to SSA, but there is no indication on how the requirements were communicated to DHS and State employees who collect the data. SSA needs to update these MOUs to ensure they have quality review programs and provide accurate data, when available. Additionally, updating the MOUs to include annual training of DHS and State employees on the information required could help SSA in preventing individuals from receiving multiple SSNs and safeguard the integrity of SSA’s Numident.

We asked SSA to provide information on the quality reviews it performed on the data received through EAE and EBE and information on its evaluation of the controls in place at DHS and State to ensure the integrity of the data and process. SSA provided its last review of enumeration accuracy that included a review of EAE for Fiscal Year 2015. Additionally, SSA evaluated multiple SSNs assigned via the EBE workload. Implementing a quality review plan at SSA to monitor the enumeration data received through EAE and EBE would provide SSA with information on discrepancies. This information would further allow SSA to provide focused training to promote DHS and State employees’ understanding of the data requirements.

CONCLUSIONS

SSA's policies and processes primarily led to the assignment of only one original SSN to individuals applying through the EAE and EBE processes. However, we found less than 1 percent of situations where technicians improperly assigned a second SSN for a person who applied through the EAE and EBE processes. Additionally, SSA continues to receive incomplete information via EAE and EBE. Although we only found a small number of individuals who received a second SSN, this causes additional work for SSA employees and increases the risk that those multiple SSNs will lead to improper payments or fraudulent activity.

RECOMMENDATIONS

We recommend SSA:

1. Cross-reference the 1,185 non-citizens' records with multiple SSNs. (We will provide these SSNs under separate cover.)
2. Revise policy to require that technicians conduct additional research for existing SSN records of non-citizens.
3. Implement a control to ensure employees follow policy when they clear alerts that result in improper assignment of SSNs.
4. Work with DHS and State to update the MOUs to include a quality review program that ensures accurate data are provided. Additionally, the MOUs should include training of DHS and State employees, when needed.
5. Design and implement a quality review plan to monitor the enumeration data received via EAE and EBE and develop training for DHS and State employees based on the inaccurate enumeration data.

AGENCY COMMENTS AND OFFICE OF THE INSPECTOR GENERAL RESPONSE

SSA agreed with Recommendations 1 and 2 but disagreed with Recommendations 3 through 5. Regarding Recommendation 3, SSA stated "OIG reports that our existing business processes have an error rate of 0.2 percent when assigning SSNs through EAE and EBE. This low error rate indicates that we have integrity checks and processes in place." While the error rate is small, these errors lead the individuals to receive a second SSN, which then requires that SSA cross-reference these numbers to the one individual. We have published multiple reports in the past showing where cross-referenced SSNs lead to additional work for SSA and increases the risk of improper payments and fraudulent activity.

For Recommendation 4, SSA stated ". . . DHS and State collect information in the normal course of their business and send us the data necessary to assign SSNs to qualified individuals. As part of our ongoing efforts to improve EAE and EBE, we will continue to emphasize with DHS and State the need to receive parental data when available." We continue to believe SSA should include a quality review program in its MOUs with DHS and State. SSA depends on DHS and State to provide the data it needs to process an SSN application and permits these

agencies to record unknown in such fields as Mother's Name, Father's Name, and City of Birth. While permitting agencies to record unknown does not interrupt SSA's enumeration process, it affects the integrity of SSA's Numident and internal processes. Ultimately, a quality review program and training, where needed, would identify issues that affect the quality of data received.

For Recommendation 5, SSA stated “. . . DHS and State collect information in the normal course of their business and send us the data necessary to assign SSNs to qualified individuals. Receipt of ‘unknown’ for non-critical elements does not make the data inaccurate.” While we did not determine whether DHS or State could have done a better job at ensuring they collect data for all fields, our findings show not having this information is one of the causes of a person receiving a second SSN. While, SSA considers certain fields, such as parent names, “non-critical” and permits “unknown” in these data fields, we disagree with SSA's process. Assigning multiple SSNs is a preventable error. SSA allowing “unknown” in its data fields makes it less likely employees will recognize multiple SSN assignment, which ultimately affects the integrity of SSA's Numident and enumeration business process.

See Appendix C for the full text of the Agency's comments.



Michelle L. Anderson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed the approximately 4.9 million original Social Security numbers (SSN)¹ the Social Security Administration (SSA) assigned in Calendar Year 2021 to determine whether SSA assigned multiple SSNs to non-citizens who applied for an SSN via the Enumeration at Entry² (EAE) or Enumeration Beyond Entry³ (EBE) processes. We initially searched for matches using computer software, then we manually reviewed to ensure they were matches. We identified 1,185 matches that were not cross-referenced in SSA's records.
- Determined whether SSA's system generated an Enumeration Feedback Message to alert SSA technicians there was similar information in SSA records that matched the application for the 1,185 non-citizens we identified SSA assigned multiple SSNs and whether SSA technicians processed these alerts correctly.
- Evaluated the data submitted electronically via the EAE and EBE processes and whether there were additional data not transmitted that would benefit SSA.
- Determined whether SSA conducted quality reviews of the data received via EAE and EBE or evaluated the controls in place at the U.S. Departments of Homeland Security and State to ensure the integrity of the data and the process.

We conducted our audit in Birmingham, Alabama, from September 2022 to June 2023. We assessed the reliability of the enumeration data by (1) reviewing related documentation from relevant prior audits, (2) looking for duplicate records, (3) comparing our record count to the expected record count, (4) tracing a statistically random sample of data to source documents, (5) testing for values outside of a designated range, (6) looking for dates outside of the audit scope of Calendar Year 2021, and (7) reviewing the data for unexpected aspects, such as sensitive or confidential records. As a result, we determined the data were sufficiently reliable for the purposes of responding to our objective.

¹ The SSN allows employers to identify and record individuals' earnings and helps SSA track earnings, determine eligibility for benefits, and pay correct benefit amounts. Testimony of Sean Brune, Deputy Commissioner for Systems and Chief Information Officer: Hearing on the Social Security Administration's Role in Combatting Identity Fraud Before the House Committee on Ways and Means, Subcommittee on Social Security, 118th Congress p. 1 (2023). SSA also uses the SSN to monitor the individual's record once benefits begin. The card issued when SSA assigns the SSN is called the original card. Subsequent cards issued from the same SSN account are called replacement cards.

² SSA, *POMS*, RM 10205.600, A (September 30, 2020). SSA has agreements with the U.S. Departments of Homeland Security and State to assist SSA in enumerating non-citizens who request an SSN via the EAE process. EAE became effective October 2002 for non-citizens age 18 or older and lawfully admitted entry into the United States as permanent residents by the U.S. Department of Homeland Security.

³ SSA, *POMS*, RM 10205.700, A (August 13, 2021). EBE became effective October 2017 for non-citizens who were applying for an employment authorization document and has since expanded to include applicants for Lawful Permanent Residency. SSA has an agreement with the U.S. Department of Homeland Security's U.S. Citizenship and Immigration Services for those non-citizens requesting an SSN via the EBE process.

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 principles as significant to the audit objective.

Component 3: Control Activities

Principle 10: Design Control Activities

Principle 12: Implement Control Activities

Component 4: Information and Communication

Principle 15: Communicate Externally

Component 5: Monitoring

Principle 16: Perform Monitoring Activities

The primary entity audited was the Office of the Deputy Commissioner for Operations. 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 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 – OPERATION ALLIES WELCOME

In the summer 2021, the United States began admitting non-citizens from Afghanistan as part of Operation Allies Welcome. The Social Security Administration (SSA) processed the Social Security number (SSN)¹ applications for these non-citizens through the Enumeration Beyond Entry (EBE) process.² Generally, once an application for an SSN card is processed, the card is mailed to the address the applicant provided.³ However, under a process unique to Operation Allies Welcome, SSA mailed SSN cards to a centralized address at the International Organization for Migration (IOM), a non-governmental agency that assisted Afghan nationals with resettlement.⁴ These non-citizens did not have permanent addresses when they entered the United States.

IOM received the SSN cards from SSA and the Employment Authorization Documents from the U.S. Department of Homeland Security (DHS) and forwarded them to the non-citizens' new locations/addresses once they were established. According to SSA, it was not involved in the decision-making process to use IOM to receive and distribute the SSN cards. SSA took possession of about 38,000 SSN cards that IOM could not deliver to the applicants. SSA worked with DHS' U.S. Citizenship and Immigration Services and IOM to improve the tracking capability, security, and mailing of SSN cards.

¹ The SSN helps SSA identify and accurately record wages or self-employment earnings. SSA also uses the SSN to monitor the individual's record once benefits begin.

² EBE became effective October 2017. The EBE program was set up through a Memorandum of Understanding with the U.S. Department of Homeland Security's U.S. Citizenship and Immigration Services to provide SSA information necessary to enumerate those non-citizens who live in the United States; need to obtain original an SSN or replacement card; and are applying with either Form I-766, *Employment Authorization Document*, or Form I-551, *Permanent Resident Card*. The data elements collected are the same as those SSA requests from non-citizens when they file for an SSN at an SSA field office or card center.

³ SSA, *POMS*, RM 10205.700, A (August 13, 2021).

⁴ SSA provided multiple instructions to assist with enumerating Afghan Special Immigrant Visa holders and refugee/asylees.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: August 30, 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, "Processing Non-citizens' Original Social Security Numbers Electronically Through Enumeration Programs" (A-08-22-51136) - INFORMATION

Thank you for the opportunity to review the draft report. Please see our detailed comments in the attached 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
“PROCESSING NON-CITIZENS’ ORIGINAL SOCIAL SECURITY NUMBERS
ELECTRONICALLY THROUGH ENUMERATION PROGRAMS” (A-08-22-51136)**

GENERAL COMMENTS

As shown in the report, our existing systems and policies ensure a high level of accuracy (99.8 percent) when we assign Social Security numbers (SSN) for non-citizens. We continue to engage with the Department of Homeland Security (DHS) and the Department of State (State) to improve and expand Enumeration at Entry (EAE) and Enumeration Beyond Entry (EBE).

Our responses to the recommendations are below.

Recommendation 1

Cross-reference the 1,185 non-citizens’ records with multiple SSNs. (We will provide these SSNs under separate cover.)

Response

We agree.

Recommendation 2

Revise policy to require that technicians conduct additional research for existing SSN records of non-citizens.

Response

We agree.

Recommendation 3

Implement a control to ensure employees follow policy when they clear alerts that results in improper assignment of SSNs.

Response

We disagree. OIG reports that our existing business processes have an error rate of 0.2 percent when assigning SSNs through EAE and EBE. This low error rate indicates that we have integrity checks and processes in place.

Recommendation 4

Work with DHS and State to update the MOUs to include a quality review program that ensures accurate data are provided. Additionally, the MOUs should include training of DHS and State employees, when needed.

Response

We disagree. DHS and State employees do not enter or process information specifically for enumeration. Rather, DHS and State collect information in the normal course of their business and send us the data necessary to assign SSNs to qualified individuals. As part of our ongoing efforts to improve EAE and EBE, we will continue to emphasize with DHS and State the need to receive parental data when available.

Recommendation 5

Design and implement a quality review plan to monitor the enumeration data received via EAE and EBE and develop training for DHS and State employees based on the inaccurate enumeration data.

Response

We disagree. DHS and State employees do not enter or process information specifically for enumeration. Rather, DHS and State collect information in the normal course of their business and send us the data necessary to assign SSNs to qualified individuals. Receipt of "unknown" for non-critical elements does not make the data inaccurate.



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.

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