

Office of the Inspector General

Kenneth S. Apfel
Commissioner of Social Security

Inspector General

Southwest Tactical Operations Plan: Demographic Characteristics of Sample
Recipients

Attached is a copy of our final report entitled, "Southwest Tactical Operations
Plan: Demographic Characteristics of Sample Recipients" (A-06-97-62001). Our
objective was to determine whether selected demographic characteristics from
Social Security Administration (SSA) data can indicate the potential residency
status of recipients chosen as part of the Office of the Inspector General's
Southwest Tactical Operations Plan.

You may wish to comment on any further action taken or contemplated on our
recommendations. If you choose to offer comments, please provide them within
60 days from the date of this memorandum. If you wish to discuss the final
report, please call me or have your staff contact Pamela J. Gardiner, Assistant
Inspector General for Audit, at (410) 965-9700.

David C. Williams

Attachment

cc:
OIG/ES
Reading File
Subject File
SSA/OIG/OA/BPA TTISON/cil/12-30-97 97-61002.
Report File

EXECUTIVE SUMMARY

OBJECTIVE

The objective of this evaluation was to determine whether selected demographic characteristics from Social Security Administration (SSA) data can indicate the potential residency status of recipients chosen as part of the Office of the Inspector General's (OIG) Southwest Tactical Operations Plan (STOP).

BACKGROUND

Supplemental Security Income (SSI) is a needs-based program that provides assistance to aged, blind or disabled adults, and blind or disabled children. In order to be eligible for SSI, an individual must: (1) have limited income and resources; (2) be aged, disabled, or blind; and (3) be a U.S. resident and either a citizen, national or eligible alien. (The former standards under title XVI of the Social Security Act provided SSI to aliens lawfully admitted for permanent U.S. residence; or aliens permanently residing in the United States under color of law.) Several recent laws and amendments have made changes to the SSI alien program.¹ These legislative changes also amend the Immigration and Nationality Act.

SSA staff in field offices (FO) along the U.S.-Mexico border have alleged that individuals are obtaining SSI while in the United States and subsequently move to a foreign country. If not detected, recipients will continue receiving payments to which they are not entitled. SSA/OIG implemented STOP in El Paso, Texas, to determine if individuals are fraudulently receiving SSI payments. The pilot project primarily was to identify, suspend, and terminate SSI assistance to recipients receiving payments based on fraudulent statements regarding residency.

The pilot project included: (1) a mailer operation requesting that individuals provide proof of residency; and (2) a matching operation with the Immigration and Naturalization Service (INS) and the Texas Bureau of Vital Statistics (BVS) to validate citizenship and birth record information contained in SSA records. Using a variety of data analysis software programs, we analyzed the data that we requested as part of the mailer operation.

¹ Public Law 104-193; Public Law 104-208; Public Law 105-18 and, Public Law 105-33

FINDINGS

In the following findings, we demonstrate the usefulness of SSA's data in determining potential residency issues. We focused on identifying factors that influence the likelihood that individuals are nonresidents of the United States, as well as on data that individuals (e.g., SSA staff) already may indicate nonresidency. We also provide some general demographic data as a means of describing the population included in this project.

- **SSA RECORDS INDICATE MOST NONCITIZEN STOP RECIPIENTS² ARE FROM MEXICO**
- **REGARDLESS OF COUNTRY OF ORIGIN, MANY STOP RECIPIENTS REQUEST SSA COMMUNICATIONS IN SPANISH**
- **OVER ONE-HALF OF STOP RECIPIENTS PROVIDED SSA WITH THE SAME ADDRESS AS AT LEAST TWO OTHER RECIPIENTS**
- **USE OF COMMERCIAL MAILBOXES MAY INDICATE PROBLEMS**
- **THIRTEEN PERCENT OF STOP RECIPIENTS RESIDE IN PUBLIC HOUSING**
- **STOP RECIPIENTS ARE LESS LIKELY TO HAVE REPRESENTATIVE PAYEES (PAYEES) THAN THE NATIONAL SSI POPULATION**
- **RECEIPT OF OASDI BENEFITS MAY SUGGEST PRIOR U.S. RESIDENCY**
- **MAJORITY OF STOP RECIPIENTS ARE RECEIVING SSI BASED ON AGE**
- **SEX BREAKDOWN OF STOP RECIPIENTS MIRRORS THE NATIONAL SSI POPULATION**
- **IN ALL CATEGORIES OF SSI ASSISTANCE, RECIPIENTS ARE MORE LIKELY TO BE FEMALE**
- **STOP RECIPIENTS ARE MORE LIKELY TO BE AGED THAN THE NATIONAL SSI POPULATION**

² The term STOP recipients represents those SSI recipients whose addresses fell within the two ZIP codes of El Paso.

CONCLUSION AND RECOMMENDATION

OIG selected all recipients in the two sample ZIP codes to determine the extent of residency issues for a potentially high-risk universe of SSI recipients. In future projects, our goal is to profile potential nonresidents to help maximize the return on efforts similar to STOP and help SSA identify nonresidents *before* they receive SSI.

SSA's data, used in combination with other sources of information, provide a valuable tool for identifying potential nonresidents. For example, we identified recipients who used commercial mailbox services by searching the local telephone book for the addresses of commercial mailbox services and comparing these addresses to those of recipients. Using similar techniques, we identified individuals living in nursing homes and public housing. These recipient "groups" warrant different levels of review not only during a residency study, such as STOP, but at the time of initial application. Therefore, we recommend that SSA consider SSI claimants' characteristics (e.g., type of address) in developing procedural guidance to assist FOs in identifying SSI claimants with questionable residency status.³

SSA COMMENTS AND OIG RESPONSE

SSA agreed with our recommendation and will update its Program Operations Manual System (POMS) accordingly. We made minor revisions to the report to reflect SSA's technical comments.

³ This is not to suggest that SSA should use all characteristics identified in this report for all recipients and/or claimants. Different regions of the United States may have different characteristics (or combinations of characteristics) which might indicate questionable residency status.

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INTRODUCTION

OBJECTIVE

The objective of this evaluation was to determine whether selected demographic characteristics from SSA's data can indicate the potential residency status of recipients chosen as part of the OIG's STOP.

BACKGROUND

SSA administers two programs under the Social Security Act—SSI (title XVI) and Old-Age, Survivors and Disability Insurance (OASDI) (title II). SSI, a needs-based program, provides assistance to aged, blind or disabled adults, and blind or disabled children. SSI was established in 1972 and was intended to aid individuals who had little or no Social Security coverage.

SSI Eligibility

SSI has specific eligibility requirements. Individuals cannot have countable income greater than the maximum benefit level or own resources worth more than \$2,000 (\$3,000 for a couple), subject to certain exclusions. Individuals also must be at least 65 years old, blind, or disabled. To be considered disabled, adults must be unable to engage in any substantial gainful activity because of a physical or mental impairment expected to result in death or last at least 12 months. For children, the impairment must meet the duration requirement and result in markedly severe functional limitation. Finally, individuals must be U.S. residents and either citizens, nationals, or eligible aliens. (The former standards under title XVI of the Social Security Act provided SSI to aliens lawfully admitted for permanent U.S. residence; or aliens permanently residing in the United States under color of law.) Several recent laws and amendments have made changes to the SSI alien program. These legislative changes also amend the Immigration and Nationality Act.

Successfully obtaining SSI assistance generally brings automatic eligibility to Medicaid, Food Stamps, and other Federal and State assistance programs. Since it is an entry point for receiving other assistance, the impact of individuals fraudulently receiving SSI is far-reaching.

SSA FO A lligations

SSA staff in FOs along the U.S.-Mexico border have alleged that individuals are obtaining SSI while in the United States and subsequently move to a foreign country. If not detected, recipients will continue receiving payments to which they are not entitled. An OIG report on an SSA initiative in Chula Vista, California, disclosed that 47.2 percent of the SSI recipients that SSA staff referred for residency verification were found ineligible because they were residing in Mexico.⁴ While problems similar to this might be occurring in other areas of the United States, it is believed to be most prevalent along the U.S.-Mexico border.

OIG Pilot Project

SSA/OIG implemented STOP in El Paso, Texas, to determine if individuals were fraudulently receiving SSI payments. The project primarily is intended to identify, suspend, and terminate SSI assistance to recipients receiving payments based on fraudulent statements regarding residency. OIG also is looking at other eligibility factors, including:

- age ;
- disability ;
- citizenship ;
- type of residence (e.g., jail nursing home) ;
- income ;and
- resources.

The pilot project included: (1) a mailer operation requesting that individuals provide proof of residency ;and (2) a matching operation with INS and Texas BVS to validate SSA data related to birth records and citizenship information.

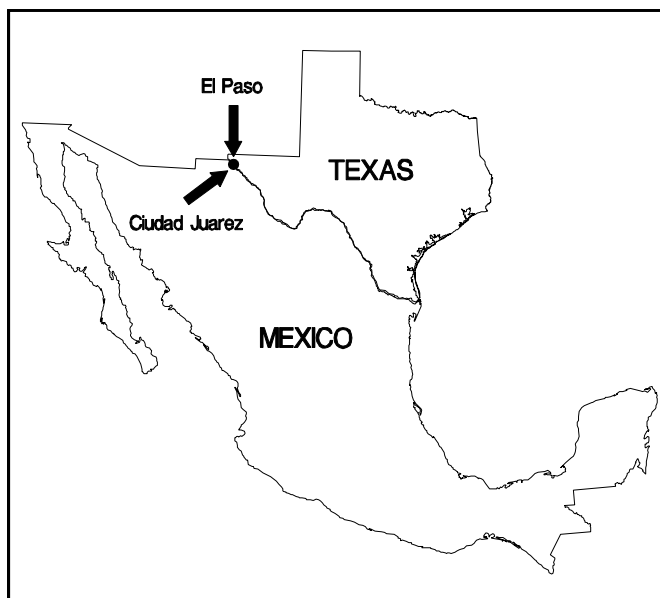
Both OIG Offices of Investigations (OI) and Audit (OA) are working on the pilot project. OI primarily is responsible for investigating questionable cases (e.g., potential nonresidency) that arise as a result of the project ;OA primarily is responsible for analyzing the outcomes of the individual initiatives of the project (e.g., the mailer operation, the BVS birth-record match, etc.). Based on these efforts, OIG will determine the usefulness of such an effort in other locations.

⁴ SSA/OIG, *The Adequacy of the Residency Verification Process for the Supplemental Security Income Program*, A-06-96-62001, May 1997, page 5.

Project Location

We selected the El Paso SSA FO as the project site because of its proximity to the U.S.-Mexico border. El Paso, a city of approximately 652,000, shares its city border with the Mexican border. Directly across the Rio Grande (connected by various foot and automobile bridges) is Ciudad Juarez, Mexico, a city of approximately 1.2 million people. The relative ease of travel between the two cities has resulted in many people identifying El Paso and Ciudad Juarez as one large city.

SSA staff and El Paso residents with whom we spoke believed residency choices often are based on cost and proximity to family and friends rather than the desire to live in a specific country. Therefore, SSA staff have suggested that El Paso SSI recipients may not be meeting the residency requirements.



METHODOLOGY

For this review, we used the data file that we requested as part of the master operation. We requested an extract of data from the Supplemental Security Record, the database SSA uses to maintain information on SSI recipients. We selected all SSI recipients with a mailing address in the 79901 and 79912 ZIP codes. These ZIP codes were selected judgmentally to address a variety of factors, including proximity to the U.S.-Mexico border, household income levels (as generalized by the FO), the nature and number of alleged nonresident recipients, and the number of recipients in the final universe. Both of these ZIP codes are located within the El Paso city limits.

The data file contained a total of 2,107 records. We used a variety of data analysis software programs to analyze the data. Since the primary focus of STOP is residency issues, we did not determine whether recipients would remain eligible based on recently enacted or proposed legislative changes.

This report is one in a series of reports related to the STOP project. Additional reports will contain information on other aspects of STOP, including results of the

investigation, and INS and Texas BVS matching efforts. This inspection was conducted in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

FINDINGS

In the following findings, we demonstrate the usefulness of SSA's data in determining potential residency issues. We focused on identifying factors that influence the likelihood that individuals are nonresidents of the United States, as well as on data that individuals (e.g., SSA staff) allege may indicate nonresidency. We also provide some general demographic data as a means of describing the population included in this project.

SSA RECORDS INDICATE MOST NONCITIZEN STOP RECIPIENTS ARE FROM MEXICO

As previously stated, residency problems are believed to be prevalent in cities along the U.S.-Mexican border. Individuals can obtain SSI while in the United States and subsequently move to Mexico. If not detected, recipients will continue to receive payments to which they are not entitled. This risk may increase based on individuals' links to foreign countries (e.g., remaining families and/or friends, comfortable with lifestyle in that country). According to SSA's data, 966 (45.8 percent) STOP recipients are not U.S. citizens. Of these, 879 (91.0 percent) are from Mexico, and 87 (9.0 percent) are from other countries, including the Ukraine, India, Lebanon, Israel, France, and Cuba.⁵

Noncitizen STOP Recipients Were Admitted to the United States Lawfully

As shown in the following table, SSA records indicate that most of the noncitizen STOP recipients were admitted to the United States lawfully. SSA records did not indicate the noncitizen status for a small number of cases.

⁵ It should be noted that the study population was adjudicated as alien eligible under the former standards under title XVI of the Social Security Act. Recipients may have become U.S. citizens since becoming entitled to SSI but have not informed SSA of their change in citizenship status.

Table 1: STOP Recipients Were Lawfully Admitted

NONCITIZEN STATUS	PERCENTAGE
Lawfully admitted to the United States for permanent residence	86.3%
Granted lawful temporary residents status by the provisions of the Immigration Reform and Control Act of 1986	12.1%
Other (e.g., granted asylum, unknown, etc.)	1.6%

REGARDLESS OF COUNTRY OF ORIGIN, MANY STOP RECIPIENTS REQUEST SSA COMMUNICATIONS IN SPANISH

Overall 75.1 percent of STOP recipients (including some U.S. citizens) requested that communications from SSA be in Spanish. These individuals are, most likely, more comfortable reading and speaking Spanish than English in their everyday lives. In combination with the background of the recipients (i.e., many are Hispanic), this suggests that these individuals could possibly live and work in Mexico.

OVER ONE-HALF OF STOP RECIPIENTS PROVIDED SSA WITH THE SAME ADDRESS AS AT LEAST TWO OTHER RECIPIENTS

A total of 1,205 STOP recipients (57.2 percent) provided SSA with the same address as at least 2 other STOP recipients. Listings of addresses with multiple recipients can be useful in identifying questionable resident addresses for recipients. For a recent OIG audit, OIG provided the Chula Vista, California, FO with a listing of recipients who claimed residency with at least two other recipients at the same address. The Chula Vista FO included 31 of these recipients in a residency verification pilot project. The FO found that 18 (58.1 percent) of the 31 recipients did not live at the residence of record, including 7 who were not U.S. residents. Payments to these 18 recipients were subsequently suspended or terminated.⁶

One-Fifth of STOP Recipients Have Same Address Listed by at Least Seven Other Recipients

Overall 450 (21.4 percent) STOP recipients shared a common address with at least 7 other STOP recipients. Some of these locations, such as mailbox services,

⁶ SSA/OIG, *The Adequacy of the Residency Verification Process for the Supplemental Security Income Program*, A-06-96-62001, May 1997, page 4.

might suggest a higher risk of residency issues. Others, such as public housing or nursing homes, may suggest a lower risk of residency issues. The following table shows the different types of living arrangements and/or addresses for these recipients.

Table 2: More Than Seven STOP Recipients Share Same Address

TYPE OF ADDRESS	NUMBER OF RECIPIENTS
Public Housing	232
Apartments	73
Other (Hotels, Foster Homes, etc.)	71
Mailbox Rental	64
Nursing Home	10
Total	450

USE OF COMMERCIAL MAILBOXES MAY INDICATE PROBLEMS

At least 67 of the STOP recipients rented mailboxes to receive their correspondence and benefit checks. These recipients rented mailboxes from 3 mailbox services, with 64 of them renting from 2 services and 3 individuals renting from the other services. All three services are within walking distance of the Mexican border. While some STOP recipients might rent mailboxes because of the threat of theft from residential mailboxes, others might rent them for other reasons, including fraudulent purposes.

SSA requires that a street address be obtained from any person using a mailbox as an address. By making a mailbox address appear as a residence, the requirement is circumvented and the possibility of recipients fraudulently receiving SSI increases. In advertising mailbox rental, some businesses in El Paso state, "Use Our Street Address" or "Street Address Mailboxes." The addresses that recipients provide to SSA will include the street address of the mailbox service. Rather than use the term "mailbox" in their address, we found recipients using other descriptive information, including APT. 78, SUITE 78, NO. 78, or # 78.

Congress Has Expressed Concern with Use of Mailboxes

Congress has expressed concern that noncitizen nonresidents may be using mailboxes in towns near the U.S.-Mexico border to fraudulently receive Government benefits. In February 1997, the General Accounting Office (GAO) reported that Government agencies have a variety of procedures to prevent inappropriate receipt

of benefits by noncitizen nonresidents. However, when residency fraud is committed, these same agencies do not capture specific information on recipients' use of mailboxes to commit the fraud. They often lump these fraudulent cases into general categories, such as "residency issues." Therefore, GAO could not gauge the extent of the problem.

THIRTEEN PERCENT OF STOP RECIPIENTS RESIDE IN PUBLIC HOUSING

There are seven public housing complexes in the two sample ZIP codes. Overall 274 recipients (13.0 percent) reside in public housing. Of these recipients, 223 reside in 2 of the 7 complexes.

Residents must meet specific eligibility criteria to obtain public housing. Therefore, these recipients are likely to be U.S. residents at the time they obtain the housing. In addition, they are more likely to remain in the United States because: (1) their rent payments are based on their financial resources, making the housing "affordable;" and (2) the incentive to live in Mexico, where rent is generally lower, is reduced.

STOP RECIPIENTS ARE LESS LIKELY TO HAVE PAYEES THAN THE NATIONAL SSI POPULATION

In the planning stages for this project, we received general allegations regarding the role payees may play in residency fraud. For example, SSA staff alleged that children may bring their parents from Mexico, apply for aged SSI for their parents (once their parents have established residency), apply to be payees, and then send their parents back to Mexico. SSA staff further alleged that payees would continue to receive the SSI payments and use the money for their own purposes.

As shown in table 3, the percentage of aged STOP recipients with payees was less than the national population. SSA's data would suggest that the role payees play in residency fraud may be less than alleged.

Table 3: Few STOP Recipients Have Payees

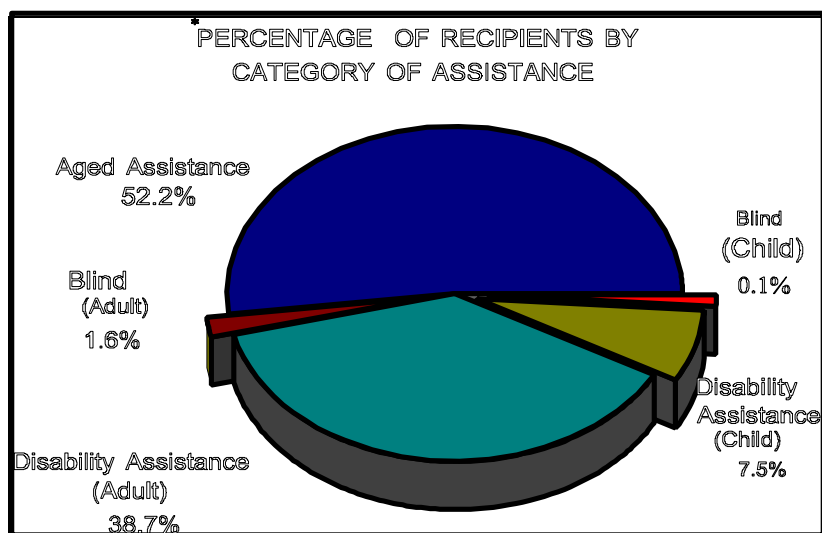
RECIPIENTS WITH PAYEES	NATIONAL*	STOP
Total	34.6%	13.6%
Adults	23.8%	20.8%
Aged	3.5%	2.1%
Children	97.4%	99.2%

RECEIPT OF OASDI BENEFITS MAY SUGGEST PRIOR U.S. RESIDENCY

In the STOP universe, 46.3 percent of recipients receive both SSI and OASDI benefits. To qualify for OASDI benefits, these individuals or their relatives must have worked at Social Security covered employment to earn the minimum credits for coverage. This may suggest that they were previously U.S. residents. Further, OASDI benefits, in addition to SSI, may provide sufficient resources to make residing in the United States more affordable.

MAJORITY OF STOP RECIPIENTS ARE RECEIVING SSI BASED ON AGE

The overall national percentage of aged SSI recipients declined from 61 percent in January 1974 to 33 percent in December 1995. However, 52.2 percent of STOP recipients were receiving SSI based on age.⁷ The high rate of aged STOP recipients corresponds with national data reported in a prior report which showed that 61.0 percent of all noncitizen SSI recipients were receiving assistance for the aged as of December 1993.⁸



**(Total of individual percentages do not equal 100.0 percent due to rounding.)*

⁷ We found cases where individuals receiving SSI based on a determination of disability were eligible for SSI based on age.

⁸ Department of Health and Human Services, OIG, Letter to the Honorable William S. Cohen, A-09-94-00057, December 1994, p. 2.

SEX BREAKDOWN OF STOP RECIPIENTS MIRRORS THE NATIONAL SSI POPULATION

As shown in the table below, the percentage of females and males in the STOP universe was similar to the national SSI population.⁹

Table 4: Sex Breakdown

RECIPIENTS GENDER	RECIPIENTS	
	National*	STOP
Female	58.3 %	58.0 %
Male	41.7 %	42.0 %

* Annual Statistical Supplement, 1996, to the Social Security Bulletin

IN ALL CATEGORIES OF SSI ASSISTANCE, RECIPIENTS ARE MORE LIKELY TO BE FEMALE.

As shown in the table below, in both the national SSI population and STOP, there were more females than males receiving SSI in each category of assistance.

Table 5: More Females Receive SSI Than Males

CATEGORY OF ASSISTANCE	NATIONAL*		STOP	
	Female	Male	Female	Male
Old-Age	72.8%	27.2%	61.2%	38.9%
Blind	58.2%	41.7%	54.6%	45.5%
Disability	58.3%	41.7%	56.5%	43.5%
All Recipients	58.3%	41.7%	58.0%	42.0%

* Annual Statistical Supplement, 1996, to the Social Security Bulletin

STOP RECIPIENTS ARE MORE LIKELY TO BE AGED THAN THE NATIONAL SSI POPULATION

⁹ In this and the final two findings, our goal was to show similarities and differences of the STOP recipient universe as compared to the national SSI population (rather than the national adult SSI population).

STOP recipients were more likely to be over age 65 than the national SSI population. In the STOP universe, 64.2 percent of recipients were 65 years or older, which is almost 2 times greater than the national rate (32.5 percent); 29.7 percent are between 18 and 64 years of age compared to 53.5 percent of the national population; and 6.1 percent are 17 or younger compared to 14.1 percent of the national population. The average age for all STOP recipients was 62 (65 for females and 58 for males).

Table 6: Age of Recipients

RECIPIENTS' AGES	NATIONAL*	STOP
Under 5	2.3%	1.6%
5-9	4.2%	1.7%
10-14	4.9%	1.8%
15-17	2.7%	1.0%
Subtotal (17 or younger)	14.1%	6.1%
18-21	3.5%	1.6%
22-29	7.3%	3.4%
30-39	12.3%	4.5%
40-49	12.1%	5.6%
50-59	12.0%	7.8%
60-64	6.3%	6.8%
Subtotal (18-64)	53.5%	29.7%
65-69	9.0%	19.6%
70-74	8.3%	18.0%
75-79	6.1%	12.5%
80 or older	9.1%	14.1%
Subtotal (65 or older)	32.5%	64.2%

* Annual Statistical Supplement, 1996, to the Social Security Bulletin. (Total of individual percentages do not equal 100.0 percent due to rounding.)

OTHER QUESTIONABLE RESIDENCY SITUATIONS

We were alerted to other questionable residency situations. Based on SSA's data alone, we are not able to suggest a level of risk associated with these situations (i.e., numbers of recipients potentially falling into these categories).

- *Apartments catering to transient populations*—Individuals may rent rooms at apartment houses at rates sufficiently low so as to allow recipients to maintain a "residence" in the United States while actually living in Mexico.
- *Recipients in the care of others*—When the address shows the recipient in the care of another person, it might be that the recipient does not actually reside at this address. Rather, the recipient just receives correspondence there while actually residing elsewhere.
- *Recipients receiving mail at alternate addresses*—Similar to the use of mailbox services and the situations presented above, some recipients choose to have their mail sent to addresses other than their residence address. Reasons for doing so include: (1) looking for a stable address because they move frequently; (2) preventing theft of their mail; and (3) traveling frequently and wishing to have someone who can respond to their mail.

CONCLUSION AND RECOMMENDATION

The OIG selected all recipients in the two sample ZIP codes to determine the extent of residency issues for a potentially high-risk universe of SSI recipients. In future projects, our goal will be to profile potential nonresidents to help maximize the return on efforts similar to STOP and help SSA identify nonresidents *before* they receive SSI.

SSA's data, used in combination with other sources of information, provide a valuable tool for identifying potential nonresidents. For example, we identified recipients who used commercial mailbox services by searching the local telephone book for the addresses of commercial mailbox services and comparing these addresses to those of recipients. Using similar techniques, we identified individuals living in nursing homes and public housing. These recipient "groups" warrant different levels of review not only during a residency study, such as STOP, but at the time of initial application. Therefore, we recommend that SSA consider SSI claimants' characteristics (e.g., type of address) in developing procedural guidance to assist FOs in identifying SSI claimants with questionable residency status.¹⁰

SSA COMMENTS AND OIG RESPONSE

SSA agreed with our recommendation and will update its POMS accordingly. We made minor revisions to the report to reflect SSA's technical comments. (See Appendix A for a full text of SSA's comments.)

¹⁰ This is not to suggest that SSA should use all characteristics identified in this report for all recipients and/or claimants. Different regions of the United States may have different characteristics (or combinations of characteristics) which might indicate questionable residency status.

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AGENCY COMMENTS

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For additional copies of this report, please contact the Office of the Inspector General's Public Affairs Specialist at (410) 966-9135. Refer to Common Identification Number A-06-97-62001.