Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

Audit Report

The Social Security Administration's Enumeration Services During the COVID-19 Pandemic

Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: September 30, 2022   **Refer to:** A-15-21-51015

To: Kilolo Kijakazi
Acting Commissioner

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

Subject: The Social Security Administration's Enumeration Services During the COVID-19 Pandemic

The attached final report presents the results of the Office of Audit's review. The objectives were to determine whether the Social Security Administration complied with its enumeration policies and procedures and had adequate controls over managing evidentiary documents submitted to support Social Security number card applications during the COVID-19 pandemic.

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

The Social Security Administration's Enumeration Services During the COVID-19 Pandemic
A-15-21-51015

Objectives

To determine whether the Social Security Administration (SSA) complied with its enumeration policies and procedures and had adequate controls over managing evidentiary documents submitted to support Social Security number (SSN) card applications during the COVID-19 pandemic.

Background

One of SSA's mission-essential functions is enumeration, the process of assigning SSNs. During the enumeration process, SSA issues a Social Security card (original and any later replacement) to each individual assigned an SSN. In Fiscal Year (FY) 2021 (October 1, 2020 to September 30, 2021), SSA processed approximately 12 million applications for original and replacement SSN cards, which is approximately 1 million fewer than it processed in FY 2020 and 5 million fewer than in FY 2019.

We reviewed non-automated enumeration services (in-person and mail-in SSN applications) for original and replacement SSN cards during the COVID-19 pandemic.

Results

SSA staff did not consistently comply with established enumeration policies and procedures or temporary enumeration guidelines, and the Agency did not have adequate controls over managing evidentiary documents submitted to support SSN card applications during the COVID-19 pandemic.

✓ We reviewed a sample of 150 SSN card applications SSA processed between November 2020 and January 2021 and found 41 contained processing errors and 45 contained documentation errors. Based on our sample, we estimated SSA made 188,659 and 128,346 SSN card application processing and documentation errors, respectively.

✓ We reviewed an additional sample of 50 replacement SSN card applications SSA processed between June and September 2021 and found 15 contained processing errors and 19 contained documentation errors.

✓ SSA staff issued multiple SSNs to 27 individuals without cross-referring the SSNs. Therefore, SSA was unaware that each individual had more than one SSN.

✓ Some SSA offices did not report the loss, or suspected loss, of personally identifiable information.

✓ SSA did not have a comprehensive method to track the total number of lost original documents.

✓ SSA did not complete the privacy assessment on WorkTrack, the workload management tool staff used to manage the enumeration workload during the pandemic.

Recommendations

We made 10 recommendations. SSA agreed with Recommendations 1 and 4 through 10. SSA disagreed with Recommendations 2 and 3.

TABLE OF CONTENTS

ABBREVIATIONS

C.F.R.	Code of Federal Regulations
DHS	Department of Homeland Security
EAB	Enumeration at Birth
EAE	Enumeration at Entry
EBE	Enumeration Beyond Entry
Form SS-5	*Application for a Social Security Card*
Form SSA-5002	*Report of Contact*
Form SSA-L2880	*Returning Documents Submitted as Evidence in Support of SSN Applications*
FY	Fiscal Year
iSSNRC	Internet SSN Replacement Cards
OIG	Office of the Inspector General
OMB	Office of Management and Budget
PII	Personally Identifiable Information
Pub. L. No.	Public Law Number
RECS	Race and Ethnicity Collection System
SSA	Social Security Administration
SSN	Social Security Number
SSNAP	Social Security Number Application Process
VIPr	Visitor Intake Process Re-write

OBJECTIVES

To determine whether the Social Security Administration (SSA) complied with its enumeration policies and procedures and had adequate controls over managing evidentiary documents submitted to support Social Security number (SSN) card applications during the COVID-19 pandemic.

BACKGROUND

One of SSA's mission-essential functions is enumeration, the process of assigning SSNs. During the enumeration process, SSA issues an SSN card (original and any later replacement) to each individual assigned an SSN. In Fiscal Year (FY) 2021, SSA processed approximately 12 million applications for original and replacement SSN cards, which is approximately 1 million fewer than it processed in FY 2020 and 5 million fewer than in FY 2019 (see Appendix A for information on the volume of SSN cards printed in FYs 2019 to 2021).

Original or Replacement Cards

There are several methods by which an individual can obtain an original or replacement SSN card (see Appendix B). Although SSA generally issues an individual only one SSN in their lifetime, an individual can request a new (different) SSN for specific reasons.[1] For our audit, we reviewed non-automated enumeration services for original and replacement SSN cards. As part of the non-automated application process (refer to Appendix D), applicants must submit evidence to verify information provided to SSA.[2] This evidence by nature contains personally identifiable information (PII).[3]

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[1] An individual can request a new SSN for reasons including misuse and disadvantage, harassment, abuse, life endangerment, and religious objections faq.ssa.gov/en-us/Topic/article/KA-02220 (August 23, 2022).

[2] A proper applicant may file an application for an SSN card on behalf of him/herself or on behalf of someone physically or mentally unable to file on his/her own behalf. Throughout our report, we refer to the applicant as an individual filing on their own behalf, unless otherwise specified.

[3] PII refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. PII may range from common data elements, such as names, addresses, dates of birth, and places of employment to identity documents; SSNs or other government-issued identifiers; precise location information; medical history; and biometrics.

Depending on the type of SSN card application and the applicant's citizenship status,[4] the applicant must generally submit evidence of age, identity, and/or citizenship/lawful status. For proof of age, identity, and citizenship/lawful presence, there are primary, secondary, and lesser sources.[5] SSA only accepts original documents or certified copies from the custodians of the records. The Agency informed us its requirements for original documents or certified copies are intended to maintain the integrity of the SSN and the card. In general, before SSA changed its workflow because of the pandemic, it did not retain evidentiary documents related to SSN card applications.

Card Applications During the COVID-19 Pandemic

In response to the COVID-19 pandemic, on March 17, 2020, SSA began limiting in-person services and redirecting most customers to its on-line and telephone services. SSA issued temporary guidelines for original and replacement SSN cards.[6] The Agency rescinded those guidelines when it reopened its offices to walk-in customers on April 7, 2022.

SSA requires that employees conduct in-person interviews with individuals who are aged 12 or older and applying for original SSN cards, unless the individuals are non-U.S. citizens who request an SSN as part of the immigration process. From March 17 through June 21, 2020, SSA limited in-person appointments to individuals who were applying for original SSN cards and were aged 12 and older. Beginning June 22, 2020, SSA expanded in-person appointments to include all original SSN cards. Effective October 22, 2020, SSA expanded in-person appointments to include individuals who were requesting replacement SSN cards and fell under prioritized situations.

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[4] SSA, *POMS,* RM 10210.010 (October 25, 2010) and RM 10210.015 (May 17, 2011).

[5] For U.S. citizens, primary proof of identity includes a valid, unexpired driver's license; state-issued identification card; or U.S. passport. For non-U.S. citizens, primary proof of identity includes such documents as a current immigration document and an unexpired foreign passport. For U.S. citizens, secondary proof of identity includes such documents as a current health insurance card showing the applicant's name and a photograph or age/date of birth. For non-U.S. citizens who meet additional requirements, secondary evidence includes such documents as an unexpired, valid U.S. driver's license. When an applicant cannot provide either primary- or secondary-level evidence, SSA will evaluate the other lesser evidence on a case-by-case basis, considering the applicant's age and circumstances. These documents are generally region-specific; SSA's regional offices evaluate, and the Central Office approves, these documents. SSA, *POMS,* RM 10210.420 (June 3, 2019) and RM 10210.415 (May 31, 2018).

[6] Throughout this report we will use the term temporary guidelines to refer to emergency messages and temporary guidance issued for enumeration during the COVID-19 pandemic.

Individuals under age 12 requesting original SSN cards and individuals requesting replacement SSN cards can apply by mail. Additionally, U.S. citizens who meet specific requirements can apply for replacement SSN cards using SSA's online services.[7] Non-U.S. citizens must submit their proof of identity and Department of Homeland Security (DHS)-issued immigration documents as evidence of their current immigration status to obtain replacement SSN cards.[8] However, since DHS requires that non-U.S. citizens have their DHS immigration documents with them at all times, the mail-in option is not an appropriate method for non-U.S. citizens requesting replacement SSN cards. Thus, from March 17 through June 21, 2020, non-U.S. citizens under age 12 did not have an acceptable option to obtain original SSN cards, and from March 17, 2020 through October 21, 2020,[9] non-U.S. citizens did not have an acceptable option to obtain replacement SSN cards, unless they were eligible to use SSA's automated services.[10] Non-U.S. citizens who were already assigned an SSN, had the option to request an SSN printout.[11] However, SSA does not consider SSN printouts as official verification of an SSN. SSA only considers the SSN card as official paper verification of the SSN.

Refer to Appendix E for the detailed processing changes, including further restrictions during the timeframes described above, and a timeline of changes SSA made to its enumeration temporary guidelines during the pandemic.

SCOPE AND METHODOLOGY

We reviewed 150 randomly selected applications for original and replacement SSN cards that SSA staff processed from November 1, 2020 to January 31, 2021, including:

- 50 applications for original SSN cards for individuals who were age 12 or older;

- 50 applications for original SSN cards for individuals who were under age 12; and

- 50 applications for replacement SSN cards.

In addition, we selected a second sample of 50 applications for replacement cards that SSA processed from June through September 2021.[12]

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[7] For more information about SSA's Internet Social Security Number Replacement Card application, see Appendix C.

[8] SSA, *POMS,* RM 10210.420 (June 3, 2019), An immigration document may satisfy the requirements for proof of both identity and citizenship. SSA, *POMS*, RM 10210.020 C.2. (October 13, 2011).

[9] In-person appointments for replacement cards with a prioritized situation were allowed beginning October 22, 2020.

[10] For more information about SSA's Enumeration at Entry and Enumeration Beyond Entry programs, see Appendix C.

[11] An SSN printout is a paper printout that displays the name of an individual and the SSN assigned to that individual.

[12] See Appendix F for our scope and methodology and Appendix G for our sampling methodology.

RESULTS OF REVIEW

SSA staff did not consistently comply with established enumeration policies and procedures or temporary enumeration guidelines, and the Agency did not have adequate controls over managing evidentiary documents submitted to support SSN card applications during the COVID-19 pandemic. Table 1 presents the number of processing errors, and Table 2 presents the number of documentation errors we estimate SSA employees made when they processed SSN card applications between November 2020 and January 2021.[13]

Table 1- Applications SSA Processed Between November 2020 and January 2021: Estimated Processing Errors

Type of Application	Applications Processed	Sample Size	Sample Errors	Estimated Errors	Error Rate
Original SSN cards for individuals aged 12 or older	62,880	50	22	27,667	44%
Original SSN cards for individuals under age 12	21,264	50	8	3,402	16%
Replacement SSN cards (first sample)	716,318	50	11	157,590	22%
Total	**800,462**	**150**	**31**	**188,659**	**24%**

Table 2 – Applications SSA Processed Between November 2020 and January 2021: Estimated Documentation Errors

Type of Application	Applications Processed	Sample Size	Sample Error	Estimated Errors	Error Rate
Original SSN cards for individuals aged 12 or older	62,880	50	31	38,986	62%
Original SSN cards for individuals under age 12	21,264	50	8	3,402	16%
Replacement SSN cards (first sample)	716,318	50	6	85,958	12%
Total	**800,462**	**150**	**45**	**128,346**	**16%**

We reviewed an additional sample of 50 replacement SSN card applications SSA processed between June and September 2021 and found 15 contained processing errors and 19 contained documentation errors.

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[13] For more information about our sampling methodology and estimation, see Appendix G.

From November 1, 2020, through January 31, 2021, SSA staff issued multiple SSNs to 27 individuals without cross-referring those SSNs. Therefore, SSA was unaware that each individual had more than one SSN.

Some SSA offices did not report loss, or suspected loss, of PII through the PII Loss Reporting Tool when applicants contacted SSA regarding their missing original evidentiary documents. In addition, SSA did not have a comprehensive method to track the total number of lost original documents. Finally, SSA did not complete the privacy assessment on WorkTrack,[14] the system Agency staff used to manage the enumeration workload during the pandemic.

Applications for Original Cards for Individuals Aged 12 or Older

SSA issued original SSN cards to individuals aged 12 or older without properly completing the mandatory interviews or documenting the mandatory in-person interviews, through the Form SSA-5002, *Report of Contact,* as required by the temporary guidelines. SSA staff made 53 errors (22 processing and 31 documentation) related to 40 of 50 sampled applications for original SSN cards for individuals aged 12 or older. Based on our sample, we estimated SSA made 27,667 and 38,986 SSN card application processing and documentation errors, respectively (see Appendix G).

Processing Errors

SSA policy requires that an SSA employee conduct an in-person interview if the applicant is age 12 or older and is applying for an original SSN.[15] SSA's temporary guidelines also require that the interviewer complete a Form SSA-5002. The Form documents the mandatory enumeration questions and answers during the in-person interview when the applicant is in the office, ensures an individual is not assigned multiple SSNs, and prevents SSA from assigning an SSN to an individual who has assumed a false identity. SSA staff made 22 processing errors:

- Processed 10 applications for original SSN cards for individuals aged 12 or over without properly completing a Form SSA-5002. For example, an employee who did not conduct the in-person interview approved an application for an original SSN card without assurance another employee asked the applicant the mandatory interview questions.

- Processed one application for an original SSN card for an individual aged 12 or over and improperly accepted an altered medical record as evidence of identity.

- Did not potentially conduct 11 in-person interviews. For example, staff processed applications without proof that mandatory in-person interviews were completed with the applicants.[16] In another example, SSA staff incorrectly issued a new (different) SSN to an

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[14] WorkTrack is an internal workload management tool that retains documents for 120 days from the closed date and can provide data on items scanned into the application by searching for an applicant's personal identifier, such as SSN or last name.

[15] 20 C.F.R. § 422.107(a).

[16] We searched SSA's Visitor Intake Process Re-write (VIPr) first for all contacts the day the enumeration application was processed. If we did not locate an in-person interview, we searched all contacts listed 1 month before the enumeration application processed date. We searched the contact's and applicant's names (if different from the contact) independently.

individual who had already been assigned an SSN. After identifying this error in our sample, we identified other individuals in our population to whom SSA incorrectly issued more than one SSN (see *Individuals to Whom the Agency Issued Multiple Social Security Numbers).*

We shared these records with SSA. Of the 22 processing errors, SSA agreed with 6 and did not review 16.

Documentation Errors

We noted instances where the staff processing the application was not the same person who conducted the in-person interview and documentation was not in WorkTrack. We also noted instances where the interviewer processed the SSN card application after the in-person interview was conducted, the applicant was no longer in the office, and documentation was not in WorkTrack. SSA staff did not properly scan evidentiary documents when it processed 31 applications for original SSNs for individuals aged 12 and older.[17] According to SSA's temporary guidelines, staff should scan all required documents for individuals aged 12 and older into WorkTrack. The Agency stated, if the interviewer will not be clearing the SSN application or cannot complete the application during the in-person interview, the interviewer will complete a Form SSA-5002; copy the applicant's completed Form SS-5, *Application for a Social Security Card,* and original documents; and scan the documents into WorkTrack to be assigned to staff who are teleworking to process.[18]

Our findings were inconsistent with the Agency's statement. Employees did not scan applications and evidentiary documents into WorkTrack. Therefore, it could not be determined whether the in-person interviews were conducted or the applicants presented appropriate evidentiary documents. For example, an SSA manager emailed evidentiary documents to an employee for processing. The manager should have scanned the document to WorkTrack as indicated by the temporary guidelines.

In addition, SSA's temporary guidelines did not include exceptions. Specifically, the guidelines stated SSA staff should complete Form SSA-5002 and scan applications and all documents for original SSN cards for individuals aged 12 and older into WorkTrack. However, SSA verbally informed us of exceptions not in the temporary guidelines. For example, the temporary guidelines did not specify they were only applicable when the interviewer was not clearing the SSN application or could not complete the application during the in-person interview. In addition, the guidelines did not state when the interviewer was completing and clearing the SSN application, they did not need to scan the evidence into WorkTrack because they could follow pre-pandemic procedures and complete all necessary actions in-person.

SSA disagreed with 12 documentation error cases where the same employee who interviewed the applicant processed the application at a later time because the interviewer did not need to give the work to another employee. However, SSA's temporary guidelines did not make

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[17] Of the 31 applications with documentation errors, 10 had processing errors (incorrectly processed Forms SS-5).

[18] Email dated October 8, 2021 with subject line *SSA Responses - RE: Update - OIG Questions - Audit No. 22021013 - OIG Review of Social Security Administration's Enumeration Services during the COVID 19 Pandemic Questions* from SSA's Audit Liaison Staff.

distinctions on whether the interviewing and processing employee were the same or different. Therefore, these cases remain a finding.

When employees inconsistently apply the COVID-19 mandatory in-person interview policy, the risk that the Agency will incorrectly issue new (different) SSN cards increases.[19] In addition, SSA managers cannot accurately report pending workloads to regional offices and stakeholders, as Social Security Number Application Process (SSNAP) entries attesting that SSA conducted in-person interviews did not match SSA's Visitor Intake Process Re-write (VIPr).[20]

We shared these records with SSA. Of the 31 documentation errors, SSA disagreed with 12 and did not review 19.

Applications for Original Cards for Individuals Under Age 12

SSA staff made 16 errors (8 processing and 8 documentation) related to 13 of 50 applications we sampled for original SSN cards for individuals under age 12. These errors occurred because SSA staff did not consistently follow established policy and procedure or temporary guidelines. As a result, SSA staff: (a) issued original SSN cards when the applicants provided insufficient information and/or evidentiary documents or (b) made documentation or keying errors in SSA's systems. Based on our sample, we estimated SSA made 3,402 and 3,402 SSN card application processing and documentation errors, respectively (see Appendix G).

Processing Errors

SSA staff made eight processing errors:

- Staff processed five original SSN cards for individuals under age 12 using proof of identity that did not meet the requirements in SSA's policy. For example, staff approved applications for SSN cards and accepted as evidence of applicants' or individuals' identities health insurance cards that did not contain biographical information[21] and a state-issued identification card that had a fictitious card number of 123456789.[22] In one adoption case, staff processed a new (different) SSN card using a policy that was specific for processing a replacement SSN card. In addition, the staff member did not document the details about the

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[19] Although SSA stated it reverted to established enumeration policies and procedures in April 2022, we found evidence that field offices and Social Security Card Centers continued processing SSN card applications after the in-person interview was conducted as recently as September 2022.

[20] VIPr was designed to help field offices automate and control all stages of in-office visitors and scheduled appointments. The program collects information about office visitors and appointments and provides management information for area, regional, and national reports. This information helps SSA analyze the effectiveness of its customer service. SSA OIG, *Safety of Employees and Visitors Since March 2020 (A-15-21-51103)*, February 2022, noted inaccurate visitor counts in SSA's systems, including VIPr.

[21] SSA stated some states' Medicaid cards do not have biographical information other than the name. According to SSA, *POMS*, RM 10210.410B (March 30, 2011) and RM 10210.420A/B (June 3, 2019), health insurance cards must have the name and a photograph, age or date of birth, or parent(s)' name(s) to qualify as an acceptable proof of identity. Thus, state-issued Medicaid cards with only a name would not be an acceptable proof of identity.

[22] The Agency stated this was a documentation error because the applicant submitted other, valid documents proving their identity. However, the technician used the fictitious state identification card in lieu of the other documents. Therefore, we determined this was a processing error.

evidence submitted in the SSNAP remarks screen (that is, document type), as required. Further, the staff member did not document discussion of the Multiple SSN Checklist.

● Staff did not properly process three Forms SS-5. Staff input the incorrect place of birth on the Numident;[23] misspelled the individual's first name although it was spelled correctly on the Form; or processed an unsigned (and therefore invalid) Form SS-5.

We shared these records with SSA. SSA agreed with the eight processing errors. We recommended SSA correct the two keying errors (misspelled first name and incorrect place of birth). Regardless of SSA's agreement with the eight cases, it had already issued the SSN cards.

Documentation Errors

SSA staff made eight documentation errors:[24]

● In four applications, SSA staff did not properly certify evidentiary documents for original SSN cards for individuals under age 12.

   ○ In three applications, SSA staff did not indicate whether the documents were originals or certified copies/extracts.

   ○ In the remaining application, an employee did not indicate his/her job title on the certification stamp.

● In four applications, SSA conducted in-person interviews but did not scan the applications and supporting documents into WorkTrack, although the applications were not processed to completion during the in-person interviews and the employees who processed the applications were not the employees who conducted the interviews. SSA disagreed with three of the errors and did not review the remaining similar error. SSA stated there is no mandatory in-person interview requirement for original SSN card requests for individuals under age 12; therefore, SSA is not required to document an in-person interview. Although in-person interviews were not required for the applications, SSA granted the applicants in-person interviews. SSA stated staff was to use WorkTrack when the interviewer could not complete and process the SSN application in-person.

We shared these records with SSA. SSA agreed with our four documentation errors related to certification stamps, disagreed with three of the errors where staff did not scan the applications and supporting documents into WorkTrack, and did not review one.

After we sent our preliminary findings to SSA, it issued updated guidance to staff with two additional options for the certification process: (1) a certification fax coversheet and (2) an automatic stamp via the photocopier. Therefore, we are not making recommendations regarding document certification.

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[23] The Numident is a database that stores PII for all Social Security numberholders.

[24] Three of the eight applications with documentation errors also had processing errors (two incorrectly processed Forms SS-5 and one proof of identity that did not meet policy requirements).

Finally, SSA staff did not retain the letters it sent applicants regarding the processing of their applications or return of their original documents. Of the 34 SSN card applications in our original SSN cards for individuals under age 12 sample that SSA received through the mail, none had a letter in SSA's systems. Because no letter was retained, SSA staff could not always determine the location of original documents. Some offices implemented their own method of tracking and retention of enumeration notices and workloads, which shows the value of retaining the information. For example, an office stated it put the notices in the Online Retrieval System[25] to serve as a tracking system if an applicant contacts the office stating their original documents were not returned to them.

SSA policy requires use of the Form SSA-L2880, *Returning Documents Submitted as Evidence in Support of SSN Applications.*[26] This Form notes SSA is returning documents submitted with the SSN application, and the applicant should contact SSA if the card is not received within 2 weeks. However, SSA personnel informed us field office technicians are not required to use Form SSA-L2880 to inform applicants their original evidentiary documents have been returned, and employees do not widely use the Form because the SSNAP receipt provides similar language.[27] Thus, SSA's policy to use Form SSA-L2880 is outdated. Also, the Agency stated its process does not retain a copy of the SSNAP receipt electronically because most SSN card requests are from individuals for whom SSA does not have an SSN or claims folders with which to electronically associate the receipts, and personnel are not required to retain them.

SSA disagreed with our finding that SSA staff did not retain the letters it sent applicants regarding the processing of their applications or return of their original documents because there is no policy or regulatory requirement to retain these notices. However, SSA staff cannot always track the location of the original documents without retention of the notices. Further, SSA's policy requires the use of Form SSA-L2880, which the Agency acknowledged is not widely used.

Applications for Replacement Cards (First Sample)

SSA employees did not consistently follow established policy and procedure when they processed replacement SSN cards. As a result, SSA staff: (1) issued replacement cards when the applicants provided insufficient information or evidentiary documents; (2) did not complete all changes requested by the applicant; or (3) made documentation errors in SSA's systems. SSA staff made 17 errors (11 processing and 6 documentation) related to 15 of our 50 sampled applications for replacement SSN cards. Based on our sample, we estimated SSA made 157,590 and 85,958 SSN card application processing and documentation errors, respectively (see Appendix G).

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[25] The Online Retrieval System captures the print image of SSA program-related notices and other documents. It allows SSA employees who deal with the public to electronically view a notice an individual has questions about.

[26] SSA, *POMS*, RM 10205.092 (February 14, 2012).

[27] Email dated November 10, 2021, with subject line *DCO Reply: Enumeration Audit-22021013 (A-15-21-51015) Information Request* from Operations staff.

Processing Errors

SSA staff made 11 processing errors:

- SSA staff processed eight applications for replacement SSN cards using proofs of identity that did not meet the requirements in SSA's policy. For example, employees approved replacement SSN cards using a school identification card with only the numberholder's photograph and marriage certificates without the individuals' biographical detail.

- SSA staff did not properly process three Forms SS-5. For example, SSA staff made improper denials, did not process changes requested by applicants, or processed an invalid Form SS-5.

Some proof of identity errors occurred because SSA did not provide complete instructions for the *Priority List of Acceptable Evidentiary Documents*.[28] For example, the Priority List includes a school identity card with the child's name and either the child's photograph, child's date of birth, or parent(s) names as an acceptable secondary identity document. The instructions provide a hyperlink to another policy that states an identity document with just a photograph is only acceptable when the applicant is present for the interview.[29] Although the Priority List states marriage documents showing the applicant's name and either the applicant's date of birth or age are acceptable for adults aged 18 or older, the policy links to more policy that provides information about biographical data requirements. In addition, a separate policy not listed in the *Priority List* provides clarification that additional proof of identity is required for the applicant when the marriage document does not contain the biographical information.[30] We noted instances where staff used the same document with no biographical detail for both proof of identity and name change to process replacement SSN card applications.

Technicians are required to review all relevant policy in association with the type of proof the applicant provided. However, SSA does not have a tool to assist staff in navigating through the complex enumeration evidentiary requirements.

We shared these records with SSA. Of the 11 processing errors, SSA agreed with 8 but did not review 3.

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[28] SSA, *POMS,* RM 10210.420 (June 3, 2019).

[29] SSA, *POMS*, RM 10210.410 (March 30, 2011).

[30] SSA, *POMS*, RM 10212.015 (April 16, 2012).

Documentation Errors

SSA staff made six documentation errors because they did not properly certify evidentiary documents as follows: [31]

● In three applications, SSA staff did not indicate whether the documents were originals or certified copies/extracts.

● In three applications, SSA staff used something other than the certification stamp. For example, they wrote "original" with no accompanying signature or certifying employee details.

We shared these records with SSA. Of the six documentation errors, SSA agreed with three and did not review three.

SSA staff did not retain letters to applicants regarding the processing of their applications or return of their original documents. Of the 48 applications in our replacement card sample that SSA received through the mail, there was no letter in SSA's systems for 46. Because the Agency did not retain the letters, staff could not always determine the location of original documents.[32]

SSA disagreed with our finding because Agency policy does not require retention of enumeration letters. However, SSA staff cannot always track the location of the original documents without retention of the notices. Further, SSA's policy requires the use of Form SSA-L2880, which the Agency acknowledged is not widely used.

Applications for Replacement Cards (Second Sample)

In September 2021, we reviewed a second sample of 50 replacement SSN card applications for the period June to September 2021. SSA staff did not consistently follow established policies and procedures when they processed replacement SSN cards.

Beginning March 5, 2021, U.S. citizens who were applying for replacement SSN cards and were unable to visit an SSA office were temporarily allowed to submit secondary proofs of identity as an alternative to the required primary documents, even when a primary-level document was available. For example, a U.S. citizen could submit a certified copy or certified extract of medical records, health insurance or Medicaid card, school identity card, or certified school record.

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[31] Two of the six applications with documentation errors also had processing errors (incorrectly processed Forms SS-5).

[32] SSA personnel informed us field office technicians are not required to use Form SSA-L2880 and are not required to retain SSNAP receipts.

While applicants could submit additional documents, staff can only accept certain forms of evidence for an SSN application. The submitted document must be an original record or document, a properly certified copy of the original record, or a properly certified extract record. An extract record is created when the custodian or SSA certifier takes certain information from the original record and certifies it for accuracy.

The results of our second review show that SSA's performance in processing replacement SSN cards did not improve. The types of errors we found were consistent with those from our first sample. Specifically, SSA staff issued replacement SSN cards when the applicant provided insufficient information or evidentiary documents, or staff made documentation errors in SSA systems. SSA staff made 34 errors (15 processing and 19 documentation) related to 25 of our 50 sampled replacement SSN cards.

Processing Errors

SSA staff made 15 processing errors:

- Staff processed seven applications for replacement SSN cards without sufficient proof of the applicants' identities. For example, SSA staff erroneously accepted medical records without biographical information; a faxed copy of a driver's license; and invalid U.S. passports.

- Staff processed eight incomplete or incorrectly completed paper Forms SS-5.

We shared these records with SSA. Of the 15 processing errors, SSA agreed with 6 and did not review 9.

Documentation Errors

SSA staff made 19 documentation errors:[33]

- In six applications, SSA staff did not indicate whether the applicants' documents were originals or certified copies/extracts.

- In four applications, SSA staff substituted the proper certification stamp with other methods, such as scanning in a coversheet or stamping the word "original" (with variations) with no accompanying signature or certifying employee details.

- In eight applications, SSA staff affixed certification stamps on submitted documents, but those certification stamps contained one or more missing fields.

- In one application, SSA staff processed an application where information from an unacceptable foreign birth certificate was entered into SSA systems.[34]

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[33] Six applications with documentation errors also had processing errors.

[34] While SSA staff keyed the foreign birth certificate information in SSA systems, per SSA, *POMS,* RM 10210.255 (July 18, 2012), proof of age is not required for the replacement SSN card and therefore would not jeopardize the issuance of the SSN card. As a result, this is not a processing error but a documentation error.

We shared these records with SSA. Of the 19 documentation errors, SSA agreed with 9 and did not review 10.

Similar to the first sample of applications for replacement SSN cards, SSA staff did not retain letters to applicants regarding the processing of their applications or return of their documents.[35] Of the 50 applications in our second sample, 10 were submitted in-person, which would not require that SSA send the applicant a letter because an SSA employee should have returned the original documents in person. One of the 50 applicants was a prisoner and therefore not required to submit original documents.[36] The remaining 39 were mail-in applications and required a letter to the applicant: 3 showed evidence SSA issued letters, but the letters did not contain the required information, and 36 did not show evidence that SSA staff issued letters.

SSA disagreed with our finding because Agency policy does not require retention of enumeration letters.[37] However, SSA staff could not always track the location of the original documents without retention of the notices during the pandemic. Further, SSA's policy requires the use of Form SSA-L2880, which the Agency acknowledged is not widely used.

Race and Ethnicity Errors

On January 20, 2021, Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,* declared ". . . that the Federal Government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality."[38] In response, SSA reminded staff that the Agency is committed to collecting more race and ethnicity data to ensure SSA conducts the SSN card application process fairly and equitably for all individuals.

According to SSA's policy, an applicant is not required to provide race and ethnicity information to receive an SSN card.[39] If the applicant elects to provide the information, SSA staff must record the appropriate response in the system. The policy further states that SSA may use the race and ethnicity data for statistical reporting, program administrative and grant reporting, and civil rights and compliance reporting.

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[35] SSA personnel informed us field office technicians are not required to use Form SSA-L2880 or retain SSNAP receipts.

[36] Replacement SSN cards may be processed for prisoners who are U.S. citizens, when no changes to the Numident record are required, and there is a prisoner replacement card memorandum of understanding in place that covers the facility where the prisoner is held. Refer to SSA, *POMS*, RM 10225.145 (March 3, 2011), for additional information on processing Form SS-5 for prisoners.

[37] In response to our draft report, SSA stated it disagreed "because the offices have now reopened and provide a receipt when requested." While offices have reopened, applicants may still request replacement SSN cards by mail.

[38] Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, Sec. 1 (January 20, 2021).

[39] SSA, *POMS*, RM 10205.140 (November 8, 2021).

While race and ethnicity responses are voluntary and do not affect the issuance of SSN cards, we were interested in understanding the public's response rates and accuracy of SSA inputs during SSN application processing. Beginning February 2010, when SSA fully implemented SSNAP, the Agency no longer maintains the paper Forms SS-5. However, during the pandemic, SSA scanned the Forms SS-5 into WorkTrack, when required, which allowed us to review them and determine whether the technicians input the actual response the applicant provided.

In the second sample of 50 applications for replacement SSN cards, we reviewed the applicants' responses to the race and ethnicity questions on the Form SS-5 to determine whether employees accurately recorded the information in SSA's Race and Ethnicity Collection System (RECS) when they processed the SSN card applications. Of the 50 applications, 45 applicants provided race and/or ethnicity information and 5 applicants did not.[40]

For 17 (34 percent) of the 50 applications, the information the applicants provided (including non-responses) did not match the Agency's RECS records. This includes 6 applications for which SSA could not locate RECS records with matching SSNs and processing dates and 11 applications for which staff recorded values for race, ethnicity, or both that differed from what the applicants provided. SSA reviewed and agreed with all 17 errors.

After our initial inquiry on RECS records, in November 2021, the Agency initiated an investigation to determine the root cause of the six missing records and whether any system changes are needed to realign how race/ethnicity is being collected. In April 2022, the Agency informed us it identified a defect in its front-facing application that permitted employees to navigate away from the race and ethnicity collection screen during application input without answering the race and ethnicity questions. As a result, these transactions were processed with missing race and ethnicity responses. Because of numerous updates to the front-facing application and system data not stored to show these types of transactions, the Agency cannot determine when this defect started or how many records have been affected. On April 23, 2022, SSA updated its systems and removed users' ability to navigate away from the race and ethnicity screen and added red text on the screen when the race and ethnicity responses are missing.[41]

While SSA does not require race and ethnicity information to issue SSN cards, and applicants are not required to provide this information, the data may be used for statistical reporting, administrative and grant reporting, and civil rights and compliance reporting. Inaccurate or missing data may lead to erroneous conclusions for researchers and SSA decisionmakers. Furthermore, this may hinder SSA's ability to fulfill the Executive Order and advance equity.

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[40] Of the 45 applicants who provided race and/or ethnicity information, 34 provided both their race and ethnicity; 6 provided their ethnicity but not their race; and 5 provided their race but not their ethnicity. The remaining five applicants in our sample provided neither their race nor their ethnicity. For applicants who did not provide responses to race, ethnicity, or both, SSA staff should have selected "No Response" in the system.

[41] If applicants choose not to provide these answers, the technician should input "No Response" on the race and ethnicity screen.

Individuals to Whom the Agency Issued Multiple Social Security Numbers

Generally, an individual is assigned only one SSN. Under certain circumstances, SSA may assign an individual a new SSN. When SSA issues a new SSN to an individual who already has one, the Agency cross-refers the SSNs in its records to reduce the possibility of confusion, error, misuse, and fraud. We identified 68 individuals to whom the Agency issued multiple SSNs from November 1, 2020 through January 31, 2021.

- For 27 individuals, SSA staff did not follow policy and issued more than 1 SSN to the same individual without cross-referring them.

- For 41 individuals, SSA staff followed cross-referring policy, which means SSA staff documented the individual possesses more than one SSN. However, for 11 applications, SSA staff incorrectly issued replacement cards after it issued the new SSN. SSA's inconsistent application of policy requirements creates a heightened risk of staff incorrectly and unknowingly issuing multiple SSNs to an individual.

SSA reviewed all of the cases and agreed with our findings.

Individuals to Whom the Agency Assigned Incorrect Social Security Numbers

From November 1, 2020 through January 31, 2021, SSA staff assigned incorrect SSNs to individuals. SSA staff issued two replacement SSN cards to incorrect individuals, resulting in PII loss. For example, staff incorrectly issued a replacement SSN card to the applicant using the SSN of someone else who had a similar name and the same date of birth. Thus, staff sent the applicant an SSN card that displayed another individual's name and SSN.

SSA staff incorrectly updated a deceased numberholder's Numident with the biographical information of another (living) numberholder. An SSA employee made a keying error, as the two SSNs were one digit apart. SSA did not have sufficient controls to prevent the keying error from updating the Numident. Therefore, the deceased numberholder's Numident shows the biographical information of another numberholder.[42]

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[42] As of August 23, 2022, SSA staff had not taken corrective action.

Privacy Concerns

Loss of Documents Containing Personally Identifiable Information

In response to the COVID-19 pandemic, SSA implemented temporary guidance for issuing new and replacement SSN cards. With limited in-person services for SSN card applications, and, because SSA's Internet Social Security Number Replacement Card (iSSNRC) application was not available in all situations, individuals may have needed to mail applications and documents bearing PII to SSA. SSA staff is responsible for returning original documents it receives through the mail.

Between May and July 2021, we visited 50 offices and asked management, "Does the office have any customer complaints about lost original documents?"[43] Management from 42 offices stated they received customer complaints about lost original documents. Data from SSA's Office of Privacy and Disclosure shows that, of the 42 offices, 13 did not use SSA's PII Loss Reporting Tool to submit a paper loss incident report from April 1, 2020, to March 31, 2022.[44] Further, 8 of the 13 offices stated they had to replace at least 1 lost document since the beginning of the pandemic.

Per Office of Management and Budget (OMB) guidance, an agency's effective detection and expeditious response to a breach is important to reduce the risk of harm to potentially affected individuals and to keep the public's trust in the Government's ability to safeguard PII.[45] Each agency shall require that all individuals with access to the agency's Federal information and information systems report a suspected or confirmed breach to the agency as soon as possible without unreasonable delay, consistent with the agency's incident management policy and procedures, Federal standards and guidelines. This includes a breach in any medium or form, including paper, oral, and electronic.

Per SSA's Breach Response Plan when employees lose or suspect the loss of PII, they must immediately notify a manager in their chain of command of the breach.[46] Managers must accept the breach report and evaluate whether the breach warrants reporting to the Agency's National Network Service Center. Managers should report the suspected or confirmed breach using the PII Loss Reporting Tool no later than 1 hour after learning of the breach.

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[43] We visited 65 field offices and Social Security Card Centers. Because of time constraints and because some offices do not handle SSN applications, we did not ask this question at 15 offices.

[44] The PII Loss Reporting Tool assists the user in determining whether a loss of PII is reportable by using a decision tree, completing a loss of PII report, notifying appropriate SSA components of the PII loss through email distribution lists, and evaluating the level of risk for the loss based on the information provided. Social Security Administration *Breach Response Plan*, sec.1 and 3 (June 2017).

[45] OMB M-17-12 *Preparing for and Responding to a Breach of Personally Identifiable Information* (January 3, 2017).

[46] SSA's Breach Response Plan provides guidance to Agency staff regarding the suspected or confirmed breach of PII to ensure SSA takes a consistent, reasonable approach to remediation and notification when there is a loss, or suspected loss, of PII.

SSA policy reiterates the Breach Response Plan by stating that SSA's policy is to report all confirmed or suspected paper PII loss incidents to the Agency privacy office within 1 hour of discovery. If there is any doubt or ambiguity about whether an incident should be reported, Agency policy requires that managers report the loss. In addition, SSA is responsible for reporting PII loss incidents resulting from items lost while being shipped or mailed.

OMB issues annual guidance instructing each Senior Agency Official for Privacy to review the administration of the agency's privacy program and report compliance data to OMB. OMB collects the data pursuant to the *Federal Information Security Modernization Act of 2014* as well as other Acts and OMB guidance. Agencies are required to report to OMB how many breaches were reported within the agency during the reporting period.

Some SSA offices did not follow the Agency's Breach Response Plan because they did not report a loss or suspected loss of PII when applicants claimed SSA lost their evidentiary documents. Not reporting the loss/suspected loss of PII or delay in reporting the incident undermines the agency's ability to apply preventative and remedial measures to protect the PII or reduce the risk of harm to potentially affected individuals. The reporting process for loss, or potential loss, of PII is very time sensitive and delays can jeopardize SSA's ability to meet mandatory reporting responsibilities.

SSA's PII Loss Reporting tool identified 5,417 instances where staff reported documentation mailed to the wrong address from March 17, 2020 through September 30, 2021. After a publicized incident of misdirected mail at one office, office managers created guidance for this office to prevent similar errors from happening. For example, for a 2-month period, all outgoing mail with original documents was to be reviewed by a second employee before it is returned to the sender, and the office was to create a holding file to house all returned unidentified mail. When asked whether similar guidance was issued to other offices with lost or misdirected documents, SSA stated the guidance was created and implemented by this office only. SSA's National Mail Handling Business Process includes a section on lost evidence but does not include standard Agency-wide mitigation steps for misdirected mail including original documents.

SSA did not take enterprise-wide steps to mitigate the risk of document loss during the COVID-19 pandemic. Improperly disclosing or losing PII could lead to identity theft. Additionally, public perception of SSA's ability to safeguard PII would suffer.

Accounting for Lost Documents

On May 7, 2021, SSA established in its accounting system new expense accounts to capture costs associated with replacing lost documents. Before this date, the Agency did not have expense accounts specific to replacement costs for lost original documents. Rather, the Agency analyzed transaction descriptions and provided an estimated number of documents and costs based on available transaction descriptions. SSA provided the following estimated and actual costs and counts of replacement documents, see Table 3.

Table 3 - Number of Documents Replaced and the Associated Costs[47]

FY	Documents SSA Replaced	Replacement Costs
2016	1	$25
2017	12	$1,440
2018	25	$6,107
2019	22	$3,988
2020	79	$10,663
2021	649	$183,923
Total	**788**	**$206,147**

Although the new expense accounts allow SSA to track the number of original documents replaced and associated costs, SSA does not track the total number of lost documents to include those that were not replaced. Therefore, the Agency cannot account for time and resources offices spend handling complaints, searching for lost documents, and other non-program-related tasks to address lost or allegedly lost documents.

Furthermore, during our visits, 43 of 50 offices stated they did not keep a log of lost documents. Also, SSA stated the PII Loss Reporting Tool is not the best method for gauging the volume of lost documents because SSA can only determine what has been lost based on what the user has reported, and each incident report may contain multiple lost documents.

Retaining Enumeration Documents

Before the pandemic, applicants who requested SSN cards generally brought their evidence to SSA field offices. SSA staff interviewed the applicants, inspected and recorded the documents, and returned the evidence to the applicants during their visits. After SSA staff reviews and authenticates the evidence, they input information from or about the evidence in SSA's enumeration systems for application processing and permanent retention. SSA does not require that employees retain evidence or copies of evidence for enumeration except for specific situations that require that the Agency retain SSN applications and evidence.

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[47] SSA provided estimated costs it incurred to replace documents for FY 2016 through May 6, 2021, and actual costs from May 7, 2021, through September 30, 2021. We did not audit these numbers and therefore do not express an opinion about their accuracy.

In response to the COVID-19 pandemic, SSA closed its offices to the public on March 17, 2020, and only a limited number of employees went into the offices to handle critical workloads. To address the abrupt disruption on the enumeration workload, SSA staff, when required, started using WorkTrack to manage SSN card applications received by mail or in-person. Staff in the office examined, photocopied, and certified submitted evidentiary documents and scanned them into WorkTrack along with the completed Forms SS-5. Staff then assigned the applications to teleworking staff to process.

Federal agencies are required to conduct privacy impact assessments for all new or substantially changed technology that collects, maintains, or disseminates PII to determine whether the information is adequately protected.[48] SSA informed us it initiated a privacy impact and risk assessment of the WorkTrack application and anticipates completing it by October 2022.[49]

Since SSA has not completed the required privacy assessments on WorkTrack, the Agency may not be aware of the risks and effects of collecting, maintaining, and disseminating PII through the application or evaluate protections and alternative processes for handling information to mitigate potential privacy risks.[50]

CONCLUSIONS

SSA staff did not consistently comply with established enumeration policies and procedures or temporary enumeration guidelines, and the Agency did not have adequate controls over managing evidentiary documents submitted to support SSN card applications during the COVID-19 pandemic.

We reviewed a sample of 150 SSN card applications SSA processed between November 2020 and January 2021 and found 41 contained processing errors and 45 contained documentation errors. Based on our sample, we estimated SSA made 188,659 and 128,346 SSN card application processing and documentation errors, respectively (see Appendix G).

We reviewed an additional sample of 50 replacement SSN card applications SSA processed between June and September 2021 and found 15 contained processing errors and 19 contained documentation errors.

From November 1, 2020, through January 31, 2021, SSA staff issued multiple SSNs to 27 individuals without cross-referring the SSNs. Therefore, SSA was unaware that each individual has more than one SSN.

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[48] *E-Government Act of 2002,* Pub.L.No. 107-347 § 208, 116 Stat. 2899 (December 17, 2002).

[49] A privacy impact and risk assessment is different from a privacy impact assessment. The privacy impact and risk assessment is an internal privacy assessment that SSA uses to determine the need for new or revised privacy controls, including a privacy impact assessment.

[50] In another audit, A-14-21-51093, we will review SSA's process for granting Authorizations to Operate. Our report will include the status of all the required security and privacy assessments for WorkTrack.

Some SSA offices did not report loss or suspected loss of PII through the PII Loss Reporting Tool when applicants contacted SSA regarding their missing original evidentiary documents. In addition, SSA did not have a comprehensive method to track lost original documents. Finally, SSA did not complete the privacy assessment on its WorkTrack application.

Enumeration is one of SSA's mission-essential functions. Since the program's inception, one of SSA's main objectives has been to maintain accuracy and confidentiality in the process of issuing SSN cards. An SSN is important because it is needed to get a job, collect Social Security benefits, and get some other government services. An individual's SSN helps the Agency identify and accurately record their earnings. SSA also uses it to monitor benefit records when an individual begins receiving benefits. SSA's evidentiary requirements help maintain the integrity of the SSN and the card. Controls over SSA's SSN card processes are critical because of the risk of identity theft. Staff noncompliance with established policies and procedures increases the risk that the Agency will incorrectly issue new (different) SSN cards, issue replacement SSN cards without sufficient evidence, or issue SSN cards to the incorrect individuals.

RECOMMENDATIONS

With respect to enumeration, we recommend SSA:

1. Develop and periodically conduct comprehensive refresher training on topics including but not limited to:

   o processing original SSN cards for individuals aged 12 or older and emphasize requirements and documentation of the in-person interview;

   o acceptable forms of evidentiary documents; and

   o processing new (different) and replacement SSN cards when adoption is involved.[51]

2. Update quality control reviews to include comparison of SSNAP inputs to an applicant-submitted Form SS-5 and evidentiary documents, and provide feedback to the technicians who made input errors (such as race and ethnicity) or did not use the appropriate evidentiary documents.

3. Revise enumeration policy to include clear instructions for when Form SSA-5002 is required and how to properly document the form.

4. Update *POMS* to provide current instructions for enumeration notices and archive outdated policy.

5. Retain enumeration notices in the Online Retrieval System for individuals with assigned SSNs.

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[51] Although this relates to 1 of the applications from our sample of individuals under age 12, we also identified 10 applications related to adoption in which SSA issued new SSNs but did not cross-refer them (see *Individuals to Whom the Agency Issued Multiple Social Security Numbers*).

6. Create and implement automated tools to assist staff in navigating through enumeration evidentiary document requirements.

7. Take corrective action on all keying errors and cross-referencing errors we identified.

With respect to privacy and original documents:

8. Require managers to verify that incident reports are submitted through the PII Loss Reporting Tool before they approve reimbursement to customers for replacing lost original documents.

9. Update the National Mail Handling Business Process to include standard Agency-wide mitigation steps for misdirected mail including original documents.

10. Complete all required privacy assessments for the WorkTrack application.

AGENCY COMMENTS AND OIG RESPONSE

SSA agreed with Recommendations 1 and 4 through 10. SSA disagreed with Recommendations 2 and 3.

SSA stated both recommendations were incompatible with their established enumeration policies and procedures, and that our findings were based on temporary pandemic guidelines that SSA has since rescinded. However, we disagree based on the errors we identified in our audit that are still present, despite SSA reverting to pre-pandemic guidelines.

Specifically, SSA disagreed with Recommendation 2 because, starting in April 2022, it resumed in-person services nationwide, rescinded temporary policy flexibilities, and reverted to established policies and procedures. Given the errors we observed in our audit, we believe SSA needs to implement Recommendation 2 because it needs to ensure the accuracy of the SSNAP inputs by comparing them to the applicant-submitted Form SS-5 and evidentiary documents. The temporary scanning of Form SS-5 and evidentiary documents in WorkTrack during the COVID-19 pandemic allowed us to identify errors SSA could not normally identify because it does not retain enumeration applications or documents. Omitting paper Form SS-5 and evidentiary documents from the quality review process hinders the Agency's ability to ensure the accuracy of staff inputs, and provide feedback to staff about incorrect inputs or appropriate use of evidentiary documents.

Additionally, SSA disagreed with Recommendation 3 because, starting in April 2022, technicians are required to input applications when they conduct the in-person interviews with the applicants – negating the need for Form SSA-5002. However, as recently as September 2022, employees did not process some applications when they conducted the interviews. We believe SSA needs to implement Recommendation 3 because – if employees continue to conduct in-person interviews with applicants but process their applications later – Form SSA-5002 is critical to capture the information employees will need when they process the applications, and policies need to be revised to ensure proper documentation in the Form.

See Appendix H for the full text of the Agency comments.

OTHER MATTER

While SSA offices were generally closed to the public during the pandemic, SSA encouraged applicants to use iSSNRC for replacement SSN cards. iSSNRC is an automated Social Security Number application process, which allows members of the public who meet certain criteria to apply for a replacement SSN card. To use iSSNRC, the numberholder must be 18-years-old or older, be a U.S. citizen with citizenship established on the SSN record, request a replacement SSN card that requires no change to the SSN record, have a valid driver's license or a state-issued identification card, and meet other criteria.[52]

During our review of the first sample of 50 applications for replacement SSN cards, we determined 49 individuals were ineligible, or unable, to use iSSNRC:

- 10 did not meet minimum age requirements;

- 7 did not meet citizenship requirements;

- 24 met citizenship and age requirements but requested a Numident change; and

- 8 appeared unable to use iSSNRC because they did not have driver's licenses or state-issued identification cards.[53]

In one application, the individual met citizenship and age requirements to use iSSNRC, did not request a Numident change, and had a driver's license. Although this individual did not have a *my* Social Security account, they could have used iSSNRC had they established an account.

In the second sample of 50 applications for replacement SSN cards, 42 applicants were ineligible, or unable, to use iSSNRC:[54]

- 2 attempted to use iSSNRC but failed because their address could not be verified;

- 7 did not meet the minimum age requirements for iSSNRC;

- 3 did not meet citizenship requirements for iSSNRC;

- 1 was a prisoner; and

- 29 met the citizenship and age requirements but requested a Numident change.

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[52] Refer to Appendix C for the requirements for customers to be able to use iSSNRC.

[53] When SSA processed the applications for replacement SSN cards in our first sample, the Agency only allowed individuals who did not have primary proof of identity available to submit secondary proof of identity for an SSN card. All eight individuals presented secondary proof of identity. Thus, we determined the eight individuals did not have a driver's license or state-issued identification card available.

[54] When SSA processed the applications for replacement SSN cards in our second sample, the Agency had temporarily allowed U.S. citizens to mail in secondary proof of identity for a replacement SSN card, regardless of whether they had a primary proof of identity. As a result, we could not determine whether applicants who submitted secondary proof of identity possessed driver's licenses or state-issued identification cards and therefore could have used the iSSNRC application.

For the remaining eight applications:

- Five applicants met the requirements to have *my* Social Security accounts, but we could not determine whether they possessed driver's licenses or state-issued identification cards to use the iSSNRC application.

- Three applicants met the requirements to have *my* Social Security accounts and use iSSNRC (they submitted their driver's licenses as proof of identity and were not requesting changes to their records) but did not use the service. All three of these applicants did not have *my* Social Security accounts.

We are not making a recommendation related to this observation, as the Agency is expanding iSSNRC. For example, SSA is working to establish a state marriage data verification service that will allow the Agency to electronically verify name changes due to marriage, eliminating the need to obtain original paper marriage evidence. SSA issued guidance on April 20, 2022 indicating the iSSNRC Name Change Due to Marriage Initiative would initially begin with Arkansas, and SSA would add additional states in the future.

Michelle L. Anderson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SOCIAL SECURITY NUMBER CARDS PRINTED IN FISCAL YEARS 2019 TO 2021

The Social Security Administration (SSA) provided the volume of Social Security number (SSN) cards printed from Fiscal Years (FY) 2019 to 2021 (October 1, 2018 to September 30, 2021). Specifically, Figure A–1 indicates the following:[1]

- Pre-pandemic, the number of SSN cards printed per month ranged from approximately 1.03 to 1.85 million from October 2018 to March 2020 (18 months). The Agency printed an average of approximately 1.42 million SSN cards per month from October 2018 to March 2020.

- During the pandemic, the number of SSN cards printed per month ranged from approximately 470,000 to 1.24 million from April 2020 to September 2021 (18 months). The Agency printed an average of approximately 860,000 SSN cards per month from April 2020 to September 2021.

- On average, SSA printed approximately 560,000 fewer SSN cards per month (39 percent reduction) during the pandemic.

Figure A–1: SSN Cards Printed – FYs 2019 to 2021
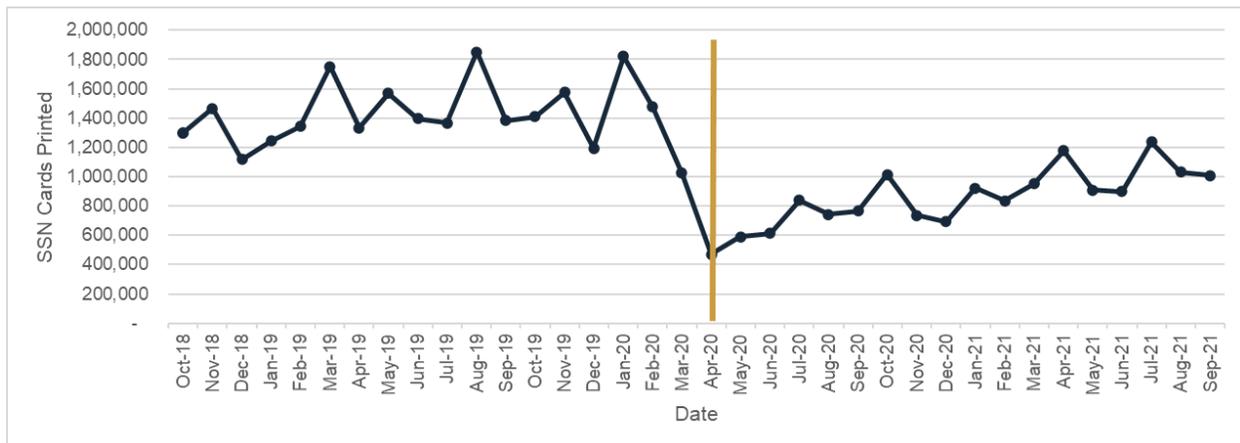
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[1] We did not audit these numbers and therefore do not express an opinion about their accuracy.

In addition, the number of SSN printouts increased.[2] Before the COVID-19 pandemic, employees provided an SSN printout only when:

● disaster procedures were in place;

● the numberholder's residence was in the area affected by the disaster; and

● the numberholder was the person requesting the SSN printout.

In response to the COVID-19 pandemic, SSA authorized the use of SSN printouts nationwide to provide flexibility for individuals requesting a printout of their SSN for third-party use. SSA staff referred individuals to the Internet Social Security Number Replacement Card (iSSNRC) and only offered an SSN printout if the individual could not use iSSNRC. Before technicians issue the SSN printout, they explain the printout is not official verification of the SSN. SSA provided the volume of SSN printouts from FYs 2019 to 2021. Figure A–2 indicates the following:[3]

● Pre-pandemic, the average SSN printouts per month from October 2018 to March 2020 (18 months) was approximately 400.

● During the pandemic, the average SSN printouts per month from April 2020 to September 2021 (18 months) was approximately 26,500.

● On average, there was approximately 26,100 more SSN printouts per month during the pandemic.

Figure A–2: SSN Printouts – FYs 2019 to 2021

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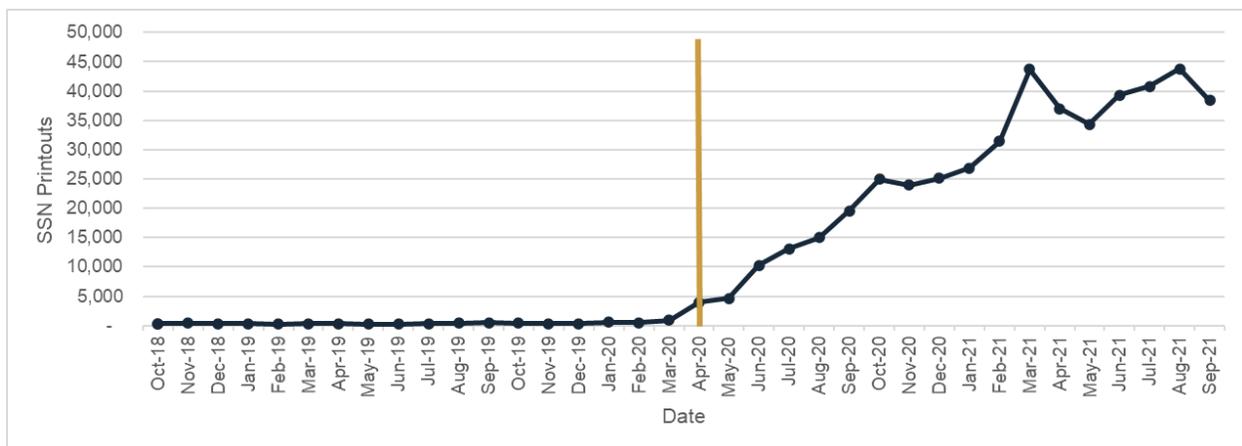
[2] The SSN printout is a paper printout that displays the name of an individual and the SSN assigned to that individual. The printout counts provided by SSA included the categories NUML and NUMI with L. The category depended on the system by which the technician requested the SSN printout. However, there were no other differences between the two categories.

[3] We did not audit these numbers and therefore do not express an opinion about their accuracy.

Appendix B – METHODS OF APPLYING FOR A SOCIAL SECURITY NUMBER CARD

1. Automated Processes (see Appendix C for additional details)

   o Through the Enumeration at Birth program, the Social Security Administration (SSA) issues original Social Security number (SSN) cards to parents who elect to receive SSNs for their newborns (U.S.-born citizens) as part of the hospital birth registration.

   o The Enumeration at Entry program is an inter-agency initiative between SSA, the Department of State, and the Department of Homeland Security (DHS) that streamlines the data-collection process for non-U.S. citizens. Through Enumeration at Entry, SSA issues original and replacement SSN cards.

   o Enumeration Beyond Entry is an inter-agency initiative between SSA and DHS to modernize the SSN card application process for individuals who live in the United States under a work authorization. Through Enumeration Beyond Entry, SSA issues original and replacement SSN cards.

   o Through its Internet SSN Replacement Card (iSSNRC) application,[1] SSA issues replacement SSN cards to U.S. citizens only.

2. Non-automated Processes (see Appendix D for additional details)

   o In-person – An applicant can apply at a Social Security Card Center[2] or field office. Applicants may apply for original or replacement SSN cards.

   o Mail-in – An applicant can apply by mailing to SSA a completed Form SS-5, *Application for a Social Security Card*, along with the appropriate evidence. Applicants may apply for original SSN cards for individuals under age 12, or replacement SSN cards.

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[1] An individual can use a *my* Social Security account to apply for a replacement SSN card online via iSSNRC if they have a *my* Social Security account and are a U.S. citizen age 18 or older with a U.S. mailing address (this includes military and diplomatic addresses); are not requesting a name change or any other change to the card (that is, a change to the Numident); and have a driver's license or state-issued identification card from one of the participating States or the District of Columbia.

[2] Card centers specialize in enumeration services for a geographical area. Any applicant who resides within the geographical area served by a card center transacts all SSN business with the card center rather than a field office. Card centers and field offices apply the same policies for enumeration.

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3. Other Processes - SSA's video teleconferencing pilot issued replacement SSN cards

   o On October 20, 2020, SSA piloted a virtual interview option where individuals may request replacement SSN cards with SSA employees' names unmasked, in states where driver's licenses and state identification cards can be verified through a data exchange with the states and the American Association of Motor Vehicle Administrators Driver's License Data Verification Program. This option enables certain U.S. citizens who are unable to use the iSSNRC process to apply virtually using video-conferencing software. The applicant must be a U.S. citizen aged 12 or older, be filing on his/her own behalf, have a valid, unexpired driver's license or state-issued identification card from a participating state, and be filing for a no-change replacement SSN card. An applicant is not required to have a *my* Social Security account and may request this option by calling their local office.

   On July 16, 2021, SSA discontinued the pilot. Beginning March 28, 2022, SSA resumed the testing of video teleconferencing in the original pilot offices and on May 20, 2022, SSA expanded to national testing of U.S. citizen no-change replacement card interviews using video teleconferencing software. Under this new iteration, employees' names are masked and SSA logo background is used.

Appendix C – AUTOMATED SOCIAL SECURITY NUMBER CARD APPLICATION PROCESSES

The Social Security Administration (SSA) has four automated Social Security number (SSN) card processes that use data from Federal and state governments.

Enumeration at Birth

The Enumeration at Birth (EAB) program, established in 1987, allows parents to obtain SSNs for their newborns as part of the birth registration process. The evidence required to process an SSN application is the same as that gathered by hospitals and birthing facilities and verified by a bureau of vital statistics during the birth registration process. All 50 states plus Puerto Rico, New York City, and the District of Columbia have a bureau of vital statistics and participate. Through EAB, a bureau of vital statistics electronically sends SSA the information needed; SSA assigns the number and issues an original SSN card. The vast majority of parents choose to use EAB. In Fiscal Year (FY) 2019, SSA assigned over 3.7 million original SSNs through EAB, which represents nearly 99 percent of original SSN cards for children under 1 year of age.

SSA provided the volume of EAB SSN original cards from March 2019 to September 2021. Figure C–1 indicates the following:[1]

● Pre-pandemic, from March 2019 to March 2020 (13 months), the number of original EAB SSN cards issued per month ranged from approximately 270,000 to 383,000. During this period, the average original EAB SSN cards issued per month was approximately 312,000.

● During the pandemic, from April 2020 to September 2021 (18 months), the number of original EAB SSN cards issued per month ranged from approximately 254,000 to 363,000. During this period, the average original EAB SSN cards issued per month was approximately 299,000.

● On average, during the pandemic, there were approximately 13,000 fewer original EAB SSN cards issued per month (4-percent decrease).

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[1] We did not audit these numbers and therefore do not express an opinion about their accuracy.

Figure C–1: EAB SSN Cards – March 2019 to September 2021
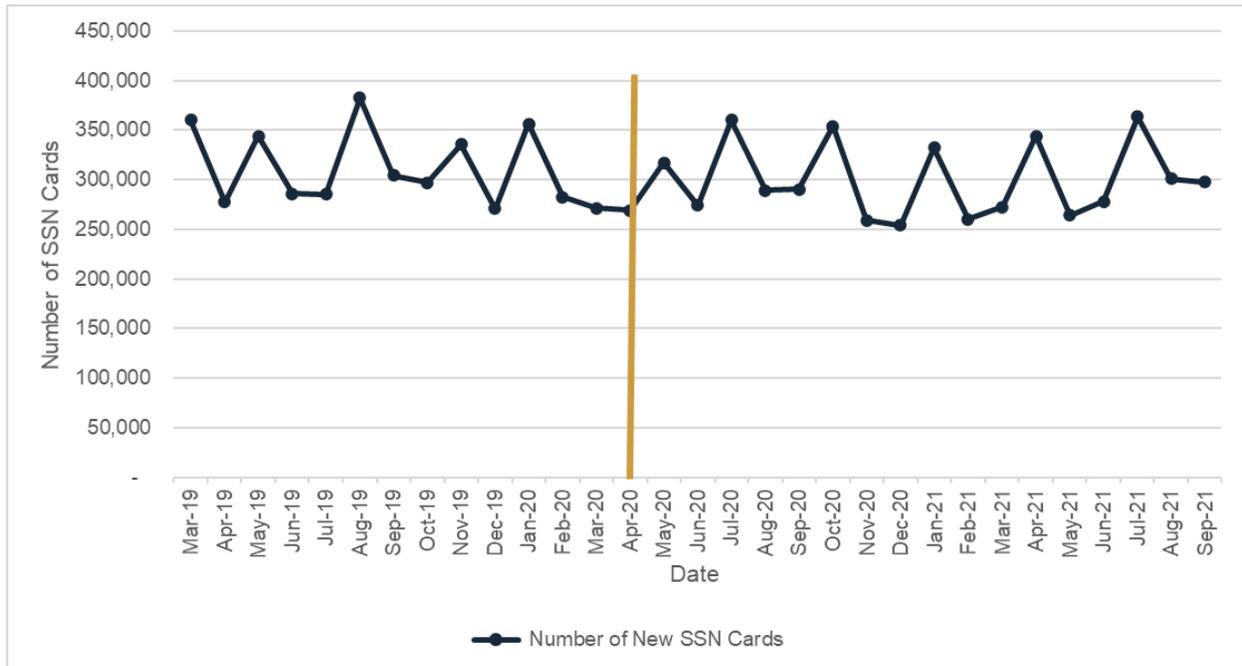

Enumeration at Entry

The Enumeration at Entry (EAE) program, established in 2002, allows lawful, permanent residents to obtain SSNs as part of the immigrant visa process. Once the Department of State approves the visa, it transmits identifying information from the visa application to the Department of Homeland Security (DHS). DHS then transmits to SSA the data needed when the person enters the country. SSA assigns the SSN and issues an original card. If the permanent resident already has an SSN, SSA issues a replacement SSN card. In FY 2019, SSA assigned almost 213,000 SSNs and issued almost 17,000 replacement SSN cards through EAE. SSA provided the volume of EAE SSN cards from March 2019 to September 2021. Figure C–2 indicates the following:[2]

● Pre-pandemic, from March 2019 to March 2020 (13 months), the number of original EAE SSN cards issued per month ranged from approximately 14,000 to 25,000. During this time, the average original EAE SSN cards issued per month was approximately 17,000. In addition, the number of replacement EAE SSN cards issued per month ranged from approximately 700 to 15,000. The average replacement EAE SSN cards issued per month was approximately 3,300.

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[2] We did not audit these numbers and therefore do not express an opinion about their accuracy.

- During the pandemic, from April 2020 to September 2021(18 months), the number of original EAE SSN cards issued per month ranged from approximately 1,100 to 25,000. During this period, the average original EAE SSN cards issued per month was approximately 10,000. In addition, the number of replacement EAE SSN cards issued per month ranged from approximately 50 to 8,900. The average replacement EAE SSN cards issued per month was approximately 820.

- On average, during the pandemic, there were approximately 7,000 fewer original EAE SSN cards issued per month (41-percent decrease). In addition, there were approximately 2,480 fewer replacement EAE SSN cards issued per month (75-percent decrease).

Figure C–2: EAE SSN Cards – March 2019 to September 2021
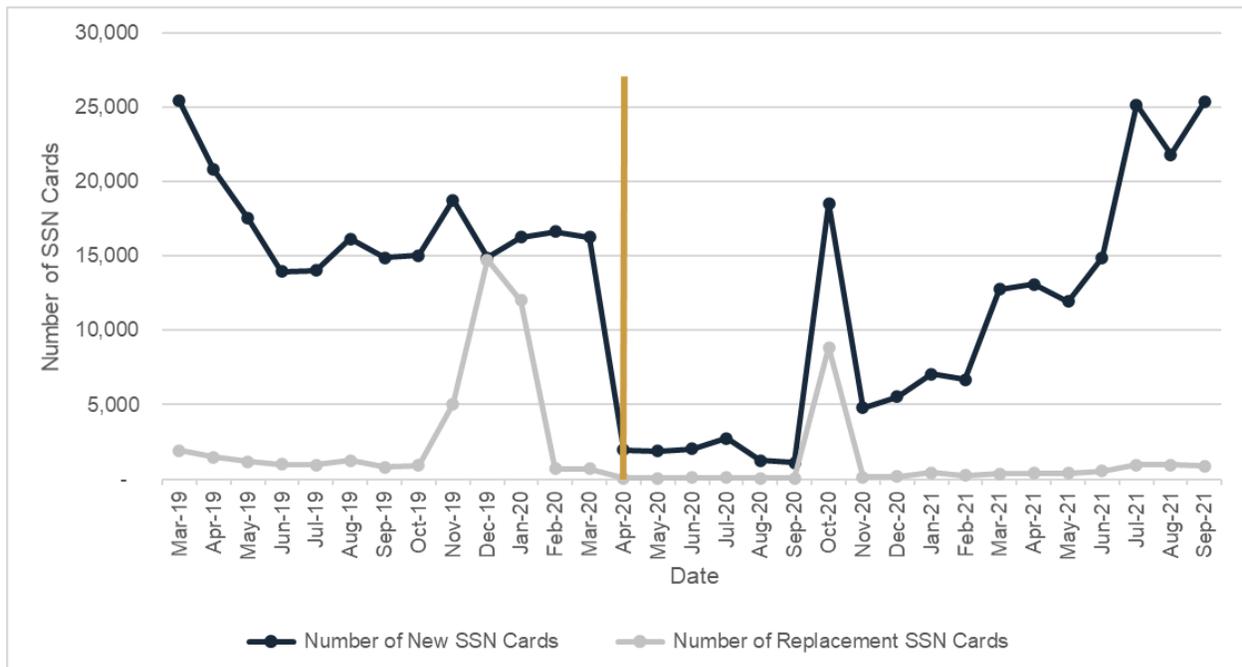
Enumeration Beyond Entry

The Enumeration Beyond Entry (EBE) program, implemented in 2017, allows lawfully present non-U.S. citizens to obtain an SSN when DHS provides them temporary work authorization. In August 2021, the EBE process was expanded to include applicants for lawful permanent residency. DHS sends SSA the information it collected and verified when approving the request for work authorization or for lawful permanent residency. SSA assigns the SSN and issues an original card. If the non-U.S. citizen already has an SSN, SSA issues a replacement SSN card. In FY 2019, SSA assigned about 350,000 SSNs and issued almost 63,000 replacement SSN cards through EBE.

SSA provided the volume of EBE SSN cards from March 2019 to September 2021. Figure C–3 indicates the following:[3]

- Pre-pandemic, from March 2019 to March 2020 (13 months), the number of original EBE SSN cards issued per month ranged from approximately 22,000 to 47,000. During this period, the average original EBE SSN cards issued per month was approximately 33,000. In addition, the number of replacement EBE SSN cards issued per month ranged from approximately 3,500 to 6,800. The average replacement EBE SSN cards issued per month was approximately 5,100.

- During the pandemic, from April 2020 to September 2021 (18 months), the number of original EBE SSN cards issued per month ranged from approximately 8,700 to 36,700. During this period, the average original EBE SSN cards issued per month was approximately 25,000. In addition, the number of replacement EBE SSN cards issued per month ranged from approximately 1,400 to 3,800. The average replacement EBE SSN cards issued per month was approximately 2,400.

- On average, during the pandemic, there were approximately 8,000 fewer original EBE SSN cards issued per month (24-percent decrease). In addition, there were approximately 2,700 fewer replacement EBE SSN cards issued per month (53-percent decrease).

**Figure C–3: EBE SSN Cards – March 2019 to September 2021**
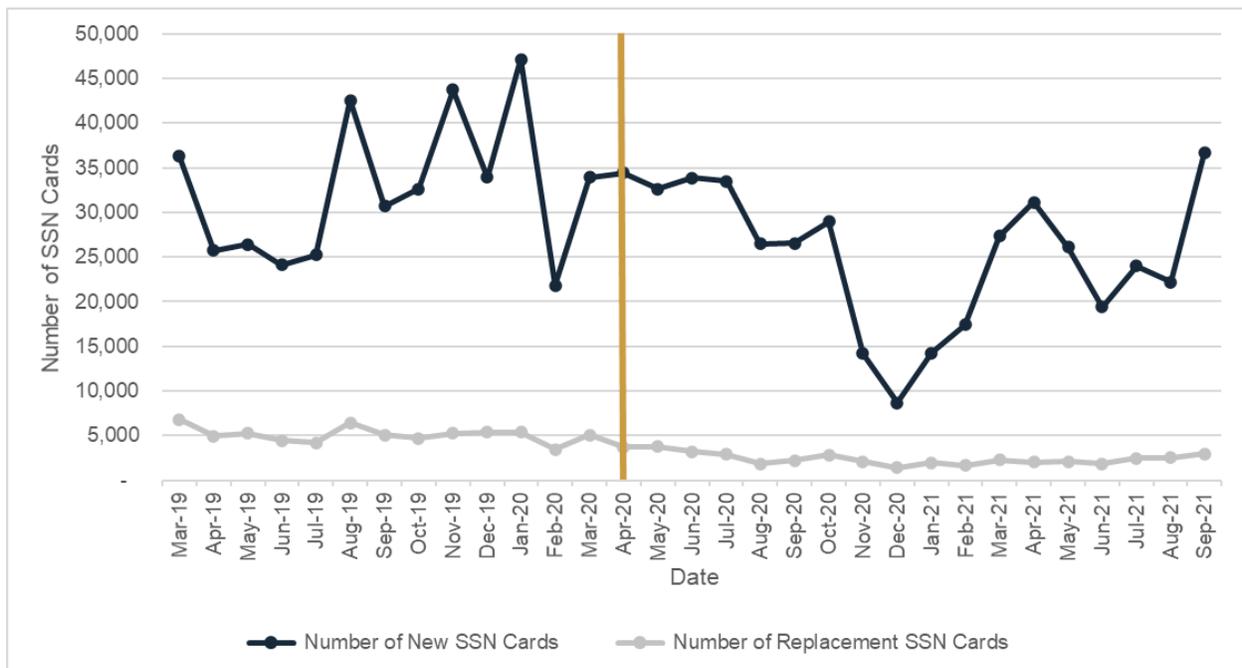
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[3] We did not audit these numbers and therefore do not express an opinion about their accuracy.

Internet Social Security Number Replacement Cards

SSA's Internet SSN Replacement Cards (iSSNRC) is an automated web interface through SSA's *my* Social Security internet application which allows certain individuals to apply for a replacement SSN card electronically. To use iSSNRC, the numberholder must meet the following criteria:[4]

- Be a U.S. citizen with his/her citizenship established on the SSN record.

- Be 18-years-old or older.

- Have a *my* Social Security online account.

- Request a replacement SSN card for his/herself that requires no change to the SSN record.

- Have a U.S. mailing address.

- Have a valid current driver's license or a state-issued identification card (issued only in certain states).[5]

- Have no Numident changes within the last 7 days.

- Have no pending applications in iSSNRC or SSNAP.

- Have no requests within iSSNRC to update SSA data.

- Have not exceeded yearly or lifetime replacement SSN card limits.

SSA provided the volume of completed iSSNRC application from March 2019 to September 2021. Figure C–4 indicates the following:[6]

- Pre-pandemic, from March 2019 to March 2020 (13 months), the number of completed iSSNRC applications per month ranged from approximately 105,000 to 201,000. During this period, the average completed iSSNRC applications was approximately 143,000.

- During the pandemic, from April 2020 to September 2021 (18 months), the number of completed iSSNRC applications per month ranged from approximately 113,000 to 363,000. During this period, the average completed iSSNRC applications per month was approximately 235,000.

- On average, during the pandemic, there were approximately 92,000 more completed iSSNRC applications per month (64-percent increase).

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[4] SSA, *POMS*, RM 10205.630 (June 6, 2022).

[5] As of April 5, 2022, iSSNRC is available to applicants in all states except for those whose driver's licenses or identification cards were issued by Alaska, New Hampshire, Oklahoma, West Virginia or by a U.S. territory (such as American Samoa, Guam, Northern Mariana Islands, Puerto Rico, or the Virgin Islands).

[6] We did not audit these numbers and therefore do not express an opinion about their accuracy.

Figure C–4: Completed iSSNRC Applications – March 2019 to September 2021
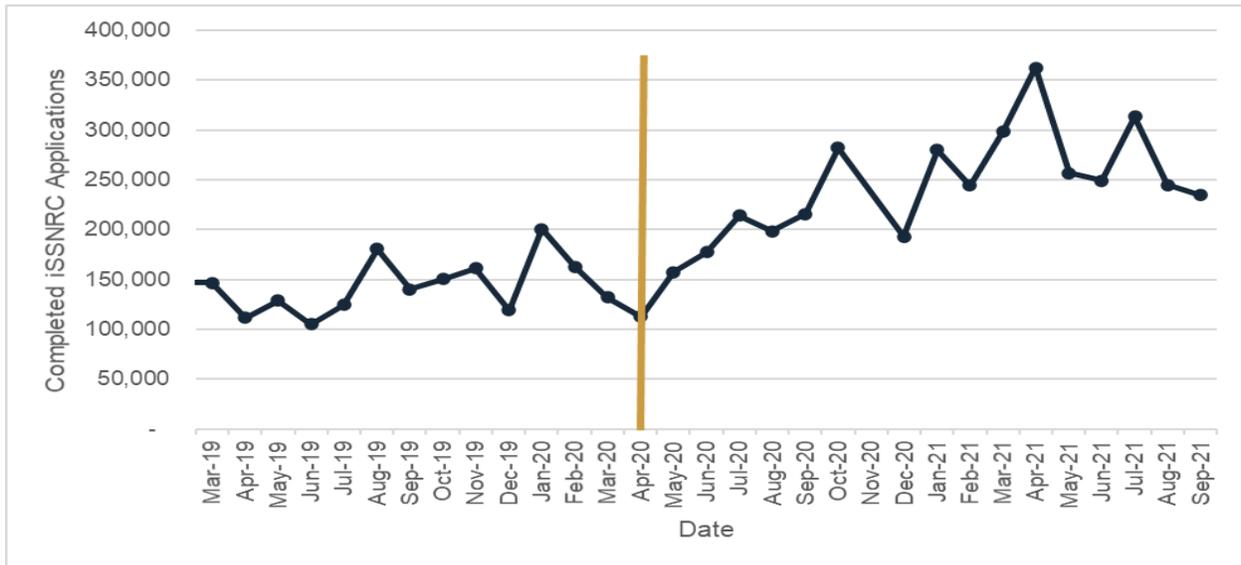
In addition, Figure C–5 indicates the breakdown of completed iSSNRC applications by state for FY 2020 and FY 2021.

Figure C–5: Map of Completed iSSNRC Applications for FYs 2020 and 2021
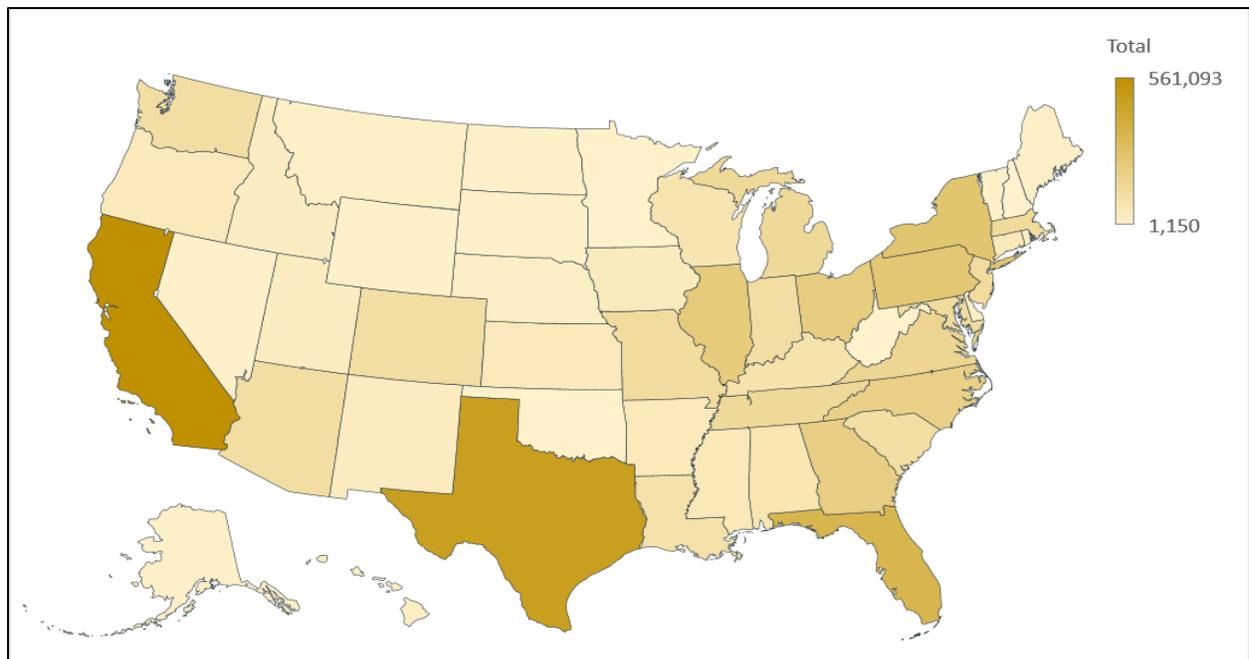
Note: In FYs 2020 and 2021, iSSNRC was not available for applicants residing in Oklahoma, Minnesota, West Virginia, and New Hampshire. iSSNRC was not available to Nevada residents until September 25, 2021. Additionally, as of May 28, 2021, iSSNRC was no longer available for Alaska residents. On December 4, 2021 (FY 2022), iSSNRC became available to Minnesota residents.

Appendix D – NON-AUTOMATED SOCIAL SECURITY NUMBER CARD APPLICATION PROCESSES

Adults and children who are mentally and physically capable of completing in-person interviews or paper applications on their own behalf and other proper applicants filing on behalf of numberholders can file applications for original Social Security number (SSN) cards.[1] There are different interview requirements for two major categories of original SSN applications as follows:

- Original SSN Cards for Individuals Aged 12 and over – the Social Security Administration (SSA) conducts a mandatory in-person interview for each applicant 12 years of age or older who is applying for an original SSN to locate any possible prior SSN and to prevent an individual from receiving an SSN under false pretenses.

- Original SSN Cards for Individuals Under Age 12 – If the individual is under age 12, an in-person interview is not required. SSA's determination on the application is based on the evidence obtained.

In addition, an individual may request a replacement SSN card due to a name change, to update Numident information, or if their SSN card was lost or stolen. When a replacement card is necessary, proof of identity is essential in ensuring the applicant is the true numberholder.[2] SSA employees process replacement cards in the Agency's Social Security Number Application Process (SSNAP).

To obtain an original or replacement SSN, the applicant must provide the following:

- Proof of Identity – Every applicant filing for an original SSN card or replacement SSN card must provide evidence for proof of identity to confirm they are who they claim to be. An adult or child filing an original application on their own behalf must provide their own proof of identity.[3] An applicant filing on behalf of a numberholder is required to provide proof of identity for the numberholder and him/herself, and proof of his/her relationship to, custody of, or responsibility for the numberholder.

- Proof of Age – Each applicant filing for an original SSN card must submit evidence to support their alleged date of birth, which SSA must verify, depending on the source. An applicant is required to provide proof of age for a replacement SSN card when there is a change to the information on the Numident.[4]

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[1] SSA, *POMS*, RM 10205.025 (August 31, 2009).

[2] SSA, *POMS*, RM 10210.405 (June 30, 2019).

[3] SSA, *POMS*, RM 10210.420 (June 3, 2019).

[4] SSA, *POMS*, RM 10210.255 (July 18, 2012).

- Proof of U.S. Citizenship – Each applicant filing for an original SSN card who alleges U.S. citizenship must submit evidence of U.S. citizenship. For replacement SSN cards, if the Numident information used by SSA systems does not confirm U.S. citizenship, then the applicant must submit evidence of U.S. citizenship.[5]

- Proof of legal status or statutory classification of an applicant who is neither a U.S. citizen nor a U.S. national.[6] Each applicant who is not a U.S. citizen or alleges a foreign place of birth must submit evidence of lawful status or work authorization.[7]

In addition, Form SS-5 and the SSNAP application request information from the applicant on race and ethnicity. Although SSA does not require race and ethnicity information[8] to issue an SSN card and the applicant is not required to provide this information, the Office of Management and Budget (OMB) regulates the collection and use of the race and ethnic descriptions and developed uniform standards for collection of data, with common categories for all Federal agencies' use. This information is kept private and used only for authorized Federal agency reporting purposes such as statistical reporting, program and administrative grant reporting, and civil rights and compliance reporting.

When individuals have telephone or in-person contact with field offices, SSA uses the Visitor Intake Process Re-write (VIPr) program, designed to help offices automate and control all stages of in-office visitors and scheduled appointments. The program collects information about office visitors and appointments and provides management information for area, regional, and national reports. This information provides a picture of visitors and reception activities that helps SSA analyze the effectiveness of the Agency's customer service. Field office employees must enter all visitors into VIPr.

Evidentiary Documents

SSA allows U.S. citizens who do not have primary evidence of identity available (available meaning the document exists and the applicant can access or obtain it within 10 business days), to present secondary evidence. For example, primary evidence of identity for a U.S. citizen from birth through age 5 includes a valid, non-expired U.S. state-issued identity card or a valid, unexpired U.S. passport, while secondary evidence includes documents such as a certified copy of a medical record.

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[5] SSA, *POMS*, RM 10210.500 (July 31, 2019).

[6] SSA, *POMS*, RM 10211.001 (April 2, 2013).

[7] There are limited situations when SSA can assign an SSN to an individual not lawfully present in the U.S., such as when the individual has established entitlement for Title 2 benefits (for example, the non-lawfully present child of a deceased U.S. citizen).

[8] SSA, *POMS*, RM 10205.140 (November 8, 2021).

An SSN applicant may complain that evidence was lost in the mail or during SSA's handling process.[9] According to Agency policy, if evidence is lost and it appears SSA had the evidence, the Agency should replace the lost document.[10] Since the evidentiary documents bear personally identifiable information (PII), SSA staff should use the PII Loss Reporting tool to report the loss or suspected loss of PII.

Attestation

Upon completion of an SSN application when the applicant is in the office, SSA provides a summary printout to the applicant. The applicant is responsible for reviewing the application information for accuracy. Following the approval of the information displayed on the printout, the SSA employee must read the applicant an attestation statement. The verbal attestation is the equivalent of a wet signature on a Form SS-5 application.

Resolution and Printing

Once staff completes an application for an original SSN or a replacement card in SSNAP, the Agency processes the application and prints and mails the SSN card (unless it is suppressed)[11] or sends a denial notice to the applicant and requests additional information. An approved SSNAP application also updates the individual's Numident record in SSA's systems. SSA mails the SSN card from Baltimore, Maryland, or Durham, North Carolina, to the numberholder's mailing address.

Enumeration Quality Assurance

SSA's Enumeration Quality Review is an end-of-line review of Numident transactions for SSN cards. SSA reports in its annual Agency Strategic plan the enumeration accuracy data it collects as a result of these reviews. The reviews assist the Agency in measuring accuracy and compliance with policies and procedures during processing of SSN cards. SSA's Office of Quality Review notes an error if the reviewer determines an employee incorrectly issued an additional SSN to an applicant, or if SSA issued an SSN to an individual who was ineligible for one because supporting documentation from Department of Homeland Security does not verify the applicant's immigration status, or the state's Bureau of Vital Statistics record does not verify the applicant's date of birth.

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[9] Our May 2022 report, (*A-08-21-51115)* found SSA lacked adequate controls over mail processing. The Agency lacked management information and performance metrics and comprehensive policies and procedures to track and return original documents.

[10] SSA, *POMS*, GN 00301.210 (January 31, 2011).

[11] When an individual reports a change in his/her Numident information, such as a date of birth correction but does not need a replacement SSN card, staff can suppress the card from being printed during the application process.

Appendix E – Enumeration and Service Delivery Changes During the Pandemic

A list of significant enumeration and service delivery changes are shown in Figure E–1.

Figure E–1: Timeline of Enumeration Polices During the Pandemic

March 17, 2020	April 23, 2020	June 22, 2020	October 2020	October 22, 2020	January 18, 2021	March 2021	March 5, 2021	May 28, 2021	April 7, 2022
Offices Closed to the Public with Limited Exceptions; In-Person Interview for Original Social Security Number (SSN) Cards for Individuals Aged 12 Years and Older Only	In-Person Interview for Original SSN Cards for Individuals Aged 12 Years and Older (Special Situations Only)	In-Person Interview for Original SSN Cards for Individuals Age 12 Years and Older or Other Original SSN Cards for Individuals in Dire Need or with Special Situations	Drop Box Pilot Began	In-Person Interview Expanded to Include Replacement Cards with Prioritized Situations	Express Interview Pilot Began	Drop Boxes Rolled Out Nationwide	Temporary Flexibility for U.S. Citizens - Secondary Evidence as Proof of Identity	Express Interviews Rolled Out Nationwide	Offices Reopened to the Public without an Appointment

Original Cards for Individuals Aged 12 and over

Beginning March 17, 2020, Social Security Administration (SSA) limited in-person appointments to individuals who are aged 12 and older and requesting new SSN cards. On April 23, 2020, SSA further restricted in-person interviews to individuals who are requesting original SSN cards and are aged 12 or older and victims of severe forms of trafficking needing Federal or state assistance; non-U.S. citizens in dire need of Federal or state assistance; or non-U.S. citizens who had already obtained employment and needed the SSNs to begin work. Effective June 22, 2020, SSA expanded the in-person appointments to include applicants for original SSN cards who are aged 12 or older and in dire need or with special situations.

SSA requires that employees hold mandatory in-person interviews with applicants who are applying for original SSN cards and are aged 12 and over. Before the COVID-19 pandemic began, SSA staff generally completed the SSN application in Social Security Number Application Process (SSNAP), with the applicant in the office.[1] Beginning in April 2020, SSA required that the interviewer complete a Form SSA-5002, *Report of Contact*, as documentation the employee completed the in-person interview and addressed the mandatory enumeration questions and responses provided by the applicant. Additionally, the interviewer was to secure a completed Form SS-5, *Application for a Social Security Card*, copy and certify original documents,[2] and scan the documents into the WorkTrack application. WorkTrack is an application technicians and managers use to track and temporarily store documents received in field offices for processing. Managers or other designated employees electronically assign documents to technicians for processing. Field offices use WorkTrack as a workload management tool; it is not a permanent repository. Although SSA employees used WorkTrack before the pandemic, that use was primarily for obtaining forms.

In addition, on January 18, 2021, SSA began testing express interviews in select offices. Express interviews are brief interviews that allow eligible individuals to apply for original or replacement SSN cards and submit necessary evidence in person.[3] On May 28, 2021, SSA rolled out the express interviews nationwide. To qualify for express interviews, individuals had to be age 12 or older and applying for original SSN cards or were unable or unwilling to mail original evidence documents. The scope of the interview was limited to receiving the individual's evidence, which was returned during the interview. SSA completed the application after the interview, and mailed the receipt to the applicant. Effective April 7, 2022, field offices no longer require that visitors have appointments to enter the offices and no longer offer express interviews.[4]

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[1] SSNAP is an internal SSA application used for processing SSN applications.

[2] The on-site employee was to review the evidence and certify it by photocopying the original document and affixing a certification stamp with signature and other required fields to the photocopy.

[3] Express interviews are also available to gather evidence needed to process claims and other workloads as well as for individuals meeting limited, critical situations. Our audit only discusses express interviews for enumeration.

[4] Although SSA stated it reverted to established enumeration policies and procedures in April 2022, we found evidence that field offices and Social Security Card Centers continued to process SSN card applications after the in-person interview was conducted as recently as September 2022.

Original Cards for Individuals Under Age 12

In response to the COVID-19 pandemic, SSA suspended all in-person original SSN card requests for individuals under age 12 until June 22, 2020. SSA does not require in-person interviews for individuals who are under age 12 applying for original SSN cards. Through the revisions of its COVID-19 guidance, SSA repeatedly reminded staff that applications for original SSN cards for individuals under age 12 could be processed through the mail. However, since the Department of Homeland Security (DHS) requires that non-U.S. citizens always have their DHS immigration documents with them, the mail-in option is not an appropriate method for non-U.S. citizens who are under age 12 and requesting original SSN cards. Thus, from March 17 through June 21, 2020, non-U.S. citizens under age 12 did not have an option to obtain original SSN cards unless they were eligible to use SSA's automated services. Effective June 22, 2020, SSA expanded in-person interviews to include all applications for original SSNs that involve dire need.

In October 2020, SSA began testing a drop-box pilot program, which it expanded nationally in March 2021. According to the drop-box business process, field offices were to use mail-in application workflows to process SSN applications placed in the drop box. When the mailed-in or drop-box applications were assigned to teleworking staff, staff in the office were to photocopy and certify the document(s) and scan all materials into WorkTrack for assignment.

When SSA receives mail-in or drop-box SSN card applications, staff keys the information on the completed Form SS-5 into SSNAP. Staff must ensure the Form SS-5 meets minimum data requirements and is signed by the proper applicant. Staff returns the evidentiary documents to the applicant by mail. According to policy, staff is to notify the applicant about the processing time for issuing a card and instruct them to contact SSA if they do not receive the card within that timeframe using Form SSA-L2880, *Returning Documents Submitted as Evidence in Support of SSN Applications*. The Form also notifies the applicant that SSA is returning the documents they sent with their application for the SSN card.

Replacement Cards

In response to the COVID-19 pandemic, SSA suspended all in-person replacement SSN card requests until October 22, 2020.[5] Replacement SSN cards do not require an in-person interview. During this time, SSA directed replacement card applicants to use the Internet SSN Replacement Cards (iSSNRC).[6] If applicants could not use iSSNRC or did not want to use the online service, they were instructed to mail applications and documents to SSA, and the Agency would later return the documents.[7] On October 22, 2020, SSA expanded in-person appointments to include individuals who were requesting replacement SSN cards and fell under prioritized situations.[8]

Non-U.S. citizens must submit their proof of identity and DHS-issued immigration documents as evidence of their immigration status to obtain replacement SSN cards.[9] However, since DHS requires that non-U.S. citizens have their DHS immigration documents with them at all times, the mail-in option is not an appropriate method for non-U.S. citizens requesting replacement SSN cards. Thus, from March 17 through October 21, 2020,[10] non-U.S. citizens did not have an acceptable option to obtain replacement SSN cards, unless they were eligible to use SSA's automated services. Non-U.S. citizens who were already assigned an SSN could request an SSN printout. However, SSA does not consider SSN printouts as official verification of an SSN. SSA only considers the SSN card as official paper verification of the SSN.

When SSA receives SSN card applications through the mail or drop boxes, staff keys the information on the completed Form SS-5 into SSNAP. Staff must ensure the Form SS-5 meets minimum data requirements and is signed by the proper applicant. When mailed-in or drop-box applications are assigned to teleworking staff, staff in the office are to photocopy and certify the document(s) and scan all materials to WorkTrack for assignment. Staff returns the evidentiary documents to the applicant by mail. According to policy, staff is to use Form SSA-L2880 to notify the applicant about the processing time for issuing a card and instruct them to contact SSA if they do not receive the card within that timeframe. The form also notifies the applicant that SSA is returning the documents they sent with their application for the SSN card.

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[5] On October 20, 2020, the Agency introduced a video teleconferencing interview option for individuals to request replacement cards. SSA halted the virtual interview option effective June 2021 and ceased the interviews on July 16, 2021. We did not evaluate SSA's video teleconferencing process.

[6] iSSNRC is an automated Web interface through SSA's *my* Social Security application which allows certain individuals to apply for replacement SSN cards electronically (refer to Appendix D).

[7] Individuals requesting replacement SSN cards also had the option to use available drop boxes beginning October 2020 in pilot offices and March 2021 nationally. Once received in the drop boxes, SSA processed the applications using the same guidelines as mail-in applications.

[8] Prioritized situations were when individuals stated they need to update or correct their SSN records (name, date of birth, or citizenship) to obtain income, resources or medical care or coverage, or other services or benefits (for example, file tax return, obtain healthcare coverage, apply for housing, or apply for an Economic Impact Payment).

[9] An immigration document may satisfy the requirements for proof of both identity and citizenship.

[10] In-person appointments for replacement cards with a prioritized situation were allowed beginning October 22, 2020.

Effective January 18, 2021, SSA began testing express interviews. On May 28, 2021, express interviews expanded nationwide, allowing individuals who needed replacement SSN cards and needed to update or correct their information in SSA's records to obtain income, resources, medical care or coverage, or other services or benefits to qualify for express interviews. SSA's guidance stated individuals also qualified for express interviews if they were unable to use automated services or unable or unwilling to mail original evidence documents. Effective April 7, 2022, field offices no longer require that visitors have appointments to enter the offices and no longer offer express interviews.[11]

Effective March 5, 2021, the Agency instructed staff to temporarily allow U.S. citizens—who require replacement SSN cards and are unable to visit an office due to COVID-19 restrictions—the flexibility to submit secondary proof of identity documents as an alternative to the required primary evidence. Applicants can submit by mail valid secondary documents proving their identities even if they have primary documents available. The temporary flexibility ended on August 1, 2022.

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[11] Although SSA stated it reverted to established enumeration policies and procedures in April 2022, we found evidence that field offices and Social Security Card Centers continued to process SSN card applications after the in-person interview was conducted as recently as September 2022.

Appendix F – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed pertinent sections of the Social Security Administration's (SSA) policies and procedures, applicable laws, regulations, and prior Office of the Inspector General reports.

- Reviewed information from SSA's Numident, Visitor Intake Process Re-write (VIPr), WorkTrack, Enumeration Application Retrieval System, Audit Trail System, Online Retrieval System, and other SSA records as necessary for the applications we sampled.

- Developed three populations of applications for original or replacement Social Security number (SSN) cards that SSA processed from November 1, 2020, through January 31, 2021, using its non-automated processes.

    a. Original SSN Cards for Individuals over Age 12.

    b. Original SSN Cards for Individuals Under Age 12.

    c. Replacement SSN Cards.

- From each of the three populations, we reviewed statistically valid samples of 50 SSN cards and determined whether SSA issued the SSN cards and documented SSA's systems according to policy.

    o To determine whether the SSN card applicant had an in-person appointment or in-person contact with the Agency, we accessed the VIPr database for each of our samples. We went to the reports tab and searched for all contacts the day the enumeration application was processed. If no in-person interview was located, we searched all contacts listed one month before the enumeration application process date. We searched by both the SSN, the individual's name, and the applicant's name (if different from the individual).

    o To determine whether the interviewer and processing employee were the same for in-person applications, we compared the VIPr interviewer's name with employee name and personal identification number data from the Audit Trail System.

    o To determine whether sampled SSN applications had documents in WorkTrack, we accessed WorkTrack for each of our sampled applications. We searched by the SSN (if available), full last name, and first two letters of last name. Finally, we asked the Agency for any WorkTrack documents associated with the enumeration application, including any archived documents, to ensure we obtained all of the documents that were input into WorkTrack.

- We conducted a follow-up review of 50 replacement SSN card applications. From a random sample of 50 offices from June to September 2021, we reviewed the most recently processed replacement SSN card for each sampled office to ensure WorkTrack documents were still accessible.

- Visited 65 SSA offices. We selected the majority of the offices based on the proximity to an Office of the Inspector General volunteer's residence, services provided, and size of the field office. We interviewed office managers, observed SSN card application processes, and reviewed SSA's management of evidentiary documents. These offices included:

    - 59 field offices and

    - 6 Social Security Card Centers.

- Interviewed staff from SSA's Offices of Operations and Systems.

- Requested information from various SSA components, including the Offices of Finance, Operations, Privacy and Disclosure, and Systems.

The principal entity audited was the Office of Operations. We conducted our audit from April 2021 through June 2022, including interviews and site visits to offices throughout the continental United States. We selected the majority of the offices based on the proximity to Office of the Inspector General volunteer's residence, services provided at the office, and the size of the field office. We conducted all visits during regular business hours with no days of the week excluded, and 18 of our visits were unannounced. We assessed the reliability of Numident and Audit Trail System data by verifying the requested data elements and records were within the specified date range. Additionally, we traced the extracted data elements to the related queries in SSA's system to ensure the data was accurate. We determined the data used in this report were sufficiently reliable given our audit objectives intended use of the data. We assessed the significance of internal controls necessary to satisfy the audit objective. This included an assessment of the five internal control components, including control environment, risk assessment, control activities, information and communication, and monitoring. In addition, we reviewed the principles of internal controls associated with the audit objective. We identified the following components and principles as significant to the audit objective:

- Component 2 – Risk Assessment

    - Principle 9 - Analyze and respond to change

- Component 3 – Control Activities

    - Principle 10- Design control activities

    - Principle 11 - Design activities for the information system

    - Principle 12 – Implement control activities

- Component 5 – Monitoring

    - Principle 16 - Perform monitoring 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 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 G – SAMPLING METHODOLOGY AND RESULTS

Sampling

To conduct this review, we used a simple random sample statistical approach. This is a standard statistical approach used for creating a sample from a population completely at random. As a result, each sample item had an equal chance of being selected throughout the sampling process, and the selection of one item had no impact on the selection of other items. Therefore, we were guaranteed to choose a sample that represented the population, absent human biases, and ensured statistically valid conclusions of, and estimations to, the entire population under review. Our sampling approach for this review ensures that our reported estimates are statistically sound and defensible.

We obtained a data extract of the Numident from November 1, 2020 through January 31, 2021. Using this extract, we reviewed a random sample of 150 Social Security number (SSN) card applications the Social Security Administration (SSA) processed, as shown in Table G–1:

Table G–1: Sample Sizes

Type of Application	Population	Sample Size
Original SSNs for Individuals Aged 12 or Older	62,880	50
Original SSN Cards for Individuals Under Age 12	21,264	50
Replacement SSN Cards (First Sample)	716,318	50

In our first random sample of 50 applications for replacement SSN cards, some evidentiary support was never in WorkTrack or no longer included in WorkTrack. Therefore, we reviewed another sample processed between June and September 2021 from a random sample of 50 offices. We reviewed the most recently processed replacement SSN card application that had both a Form SS-5 and evidentiary support in WorkTrack.

Sample Errors

Based on our random samples, we identified 56 enumeration processing errors or 28-percent processing error rate as shown in Table G–2.

Table G–2: Processing Errors in Samples

Type of Application	Sample Size	Processing Errors	Error Rate
Original SSN Cards for Individuals Aged 12 or Older	50	22	44%
Original SSN Cards Individuals Under Age 12	50	8	16%
Replacement SSN Cards (First Sample)	50	11	22%
Replacement SSN Cards (Second Sample)	50	15	30%
Total	**200**	**56**	**28%**

Of the 56 processing errors, SSA agreed with 28 (50.0 percent), disagreed with 0 (0.0 percent), and did not review 28 (50.0 percent) as shown in Table G–3.

Table G–3: Agency Review of Processing Errors

Type of Application	Agreed	Disagreed	Did Not Review	Total
Original SSN Cards for Individuals Aged 12 or Older	6	0	16	22
Original SSN Cards Individuals Under Age 12	8	0	0	8
Replacement SSN Cards (First Sample)	8	0	3	11
Replacement SSN Cards (Second Sample)	6	0	9	15
Total	**28**	**0**	**28**	**56**

In addition, we identified 64 enumeration documentation errors or 32-percent documentation error rate as shown in Table G–4.

Table G–4: Documentation Errors in the Samples

Type of Application	Sample Size	Documentation Errors	Error Rate
Original SSN Card for Individuals Aged 12 or Older	50	31	62%
Original SSN Cards for Individuals Under Age 12	50	8	16%
Replacement SSN Cards (First Sample)	50	6	12%
Replacement SSN Cards (Second Sample)	50	19	38%
Total	**200**	**64**	**32%**

Of the 64 documentation errors, SSA agreed with 16 (25.0 percent), disagreed with 15 (23.4 percent), and did not review 33 (51.6 percent) as shown in Table G–6Table G–3.

Table G–5: Agency Review of Documentation Errors

Type of Application	Agreed	Disagreed	Did Not Review	Total
Original SSN Cards for Individuals Aged 12 or Older	0	12	19	31
Original SSN Cards Individuals Under Age 12	4	3	1	8
Replacement SSN Cards (First Sample)	3	0	3	6
Replacement SSN Cards (Second Sample)	9	0	10	19
Total	**16**	**15**	**33**	**64**

Sample Estimate

To avoid over-estimating the replacement SSN processing and documentation errors, we did not estimate both replacement SSN card samples. We estimated our sample results of the three separate random samples of 50 SSN card applications SSA processed between November 1, 2020 and January 31, 2021 to the populations.[1] We estimated processing errors as shown in Table G–6.

Table G–6: Estimated SSN Application Processing Errors

Type of Application	Original SSN Cards for Individuals Aged 12 or Older	Original SSN Cards for Individuals Under Age 12	Replacement SSN Cards (First Sample)
Sample Results	22	8	11
Point Estimate	27,667	3,402	157,590
Upper Limit	35,569	5,743	241,951
Lower Limit	20,114	1,750	92,090

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

We estimated documentation errors as shown in Table G–7.

Table G–7: Estimated SSN Application Documentation Errors

Type of Application	Original SSN Cards for Individuals Aged 12 or Older	Original SSN Cards for Individuals Under Age 12	Replacement SSN Cards (First Sample)
Sample Results	31	8	6
Point Estimate	38,986	3,402	85,958
Upper Limit	46,209	5,743	159,858
Lower Limit	31,064	1,750	38,376

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

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[1] To provide a conservative estimation, we did not estimate the second replacement SSN card results because it had a higher number of errors.

Appendix H − AGENCY COMMENTS

SOCIAL SECURITY

MEMORANDUM

Date: September 26, 2022   **Refer To:** TQA-1

To: Gail S. Ennis
             Inspector General
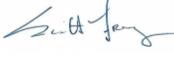
From: Scott Frey
             Chief of Staff

Subject: Office of the Inspector General Draft Report, "The Social Security Administration's
             Enumeration Services During the COVID-19 Pandemic" (A-15-21-51015) — INFORMATION

Thank you for the opportunity to review the draft report. We agree with recommendations 1, and
4 through 10. We disagree with recommendations 2 and 3.

Recommendations 2 and 3 are not compatible with our established enumeration policies and
procedures. During the COVID-19 pandemic, we implemented temporary policy flexibilities to
address the needs of the public while also following appropriate safety protocols. In April 2022,
we resumed in-person services nationwide with or without an appointment, rescinded temporary
policy flexibilities, and reverted to established policies and procedures. Recommendations 2 and
3 address errors OIG found based on temporary pandemic guidelines that we have since
rescinded.

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

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