Audit Report

Cross-referred Social Security
Numbers



MEMORANDUM

To:

Date: Refer to: 062308 July 31, 2024

Martin O'Malley Commissioner

Michell & anderson From: Michelle L. Anderson

Assistant Inspector General for Audit

as Acting Inspector General

Subject: Cross-referred Social Security Numbers

The attached final report presents the results of the Office of Audit's review. The objectives were to determine the validity of payments issued under cross-referred Social Security numbers (SSN) and whether death information input in one Numident record was also input in crossreferred Numident record(s).

If you wish to discuss the final report, please contact me or have your staff contact Mark Searight, Deputy Assistant Inspector General for Audit.

Attachment

Cross-referred Social Security Numbers 062308



July 2024

Office of Audit Report Summary

Objectives

To determine the validity of payments issued under cross-referred Social Security numbers (SSN) and whether death information input in one Numident record was also input in cross-referred Numident record(s).

Background

The SSN was originally created to keep an accurate record of each numberholder's earnings. Generally, SSA assigns an individual one SSN during their lifetime, but an individual may legitimately acquire more than one SSN under certain circumstances. When SSA assigns an individual more than one SSN, SSA should cross-refer the Numident records. For benefit purpose, cross-referring ensures the individual will get credit for all earnings reported on all of the SSNs assigned to them.

SSA matches death reports from various sources against its payment records and inputs this information on the Numident. Utilizing this data, SSA compiles a comprehensive file of death information, which we refer to as the full Death Master File (DMF), which it shares, as authorized, with federal benefit-paying agencies to assist with the prevention and detection of fraud.

SSA has cross-referred approximately 10.3 million Numident records to at least 1 other Numident record.

Results

SSA issued improper payments under cross-referred SSNs and did not ensure death information input on a deceased individual's Numident record was also input on the individual's cross-referred Numident records. Our sample reviews identified that SSA:

- Issued improper payments to beneficiaries simultaneously under both cross-referred SSNs. When calculating their benefit payments, SSA erroneously treated each beneficiary as two individuals and paid them more than they were entitled to receive.
- Issued improper payments to beneficiaries whose Numident records were erroneously cross-referred to other individual's records. SSA computed each beneficiary's payments based on the combined earnings of two different individuals and paid them more than they were entitled to receive.
- Issued improper payments to beneficiaries because it did not terminate their benefits after receiving their death information and posting it on their cross-referred Numident records.
- Received and input death information on deceased individuals' Numident records but did not record the death information on their cross-referred records.

This occurred because SSA did not develop system controls to prevent individuals with multiple SSNs from receiving benefits under both of their cross-referred SSNs or ensure death information input on a decedent's Numident record was also input on their cross-referred records. Also, SSA employees erroneously cross-referred two individuals' records and either allowed or forced SSA systems to compute one individual's benefits based on two individuals' combined earnings.

Based on review of randomly selected cases, we estimate SSA issued approximately \$147 million in improper payments to 3,783 beneficiaries and will issue another \$23 million in improper payments over 12 months if these errors are not corrected. We also estimate SSA had death information for more than 2 million deceased individuals that it did not input on the Numident preventing DMF users, that rely on SSA's death information, from knowing the individuals were deceased.

Recommendations

We made 5 recommendations for corrective action. SSA agreed with our recommendations.

TABLE OF CONTENTS

Objectives	1
ackground	1
Scope and Methodology	2
Results of Review	3
Benefit Payments Issued Simultaneously Under Both Cross-referred Social Security Numbers	3
Beneficiaries Whose Numident Records Were Cross-referred to Deceased Individuals' Records	5
Beneficiaries Whose Numident Records Were Cross-referred to Living Non-current Paym Status Individuals' Records	
Non-current Payment Status Individuals Whose SSNs Were Cross-referred to Deceased Individuals' Records	
System Controls	7
Conclusion	8
Recommendations	8
gency Comments	9
ppendix A – Scope and Methodology	A-1
ppendix B – Sample Results and Estimates	B-1
ppendix C – Agency Comments	.C-1

ABBREVIATIONS

DMF Death Master File

OASDI Old-Age, Survivors, and Disability Insurance

OIG Office of the Inspector General

PII Personally Identifiable Information

POMS Program Operations Manual System

SSA Social Security Administration

SSI Supplemental Security Income

SSN Social Security Number

WAN Wrong Account Number

OBJECTIVES

To determine the validity of payments issued under cross-referred Social Security numbers (SSN) and whether death information input in one Numident record was also input in cross-referred Numident record(s).

BACKGROUND

The SSN was originally created to keep an accurate record of each numberholder's (individual's) earnings. When SSA began assigning SSNs in the 1930s, it assigned and issued SSN cards in local Post Offices and Social Security field offices nationwide. In the 1970s, SSA used the paper records to create the Numerical Index File, also known as the Numident, an electronic file that contains personally identifiable information (PII) for each person issued an SSN. In March 1972, SSA began exclusively assigning SSNs and issuing SSN cards via a computer-based system in Baltimore, Maryland.

Generally, SSA assigns an individual one SSN during their lifetime, but an individual may legitimately acquire more than one SSN under certain circumstances. When SSA assigns an individual more than one SSN, SSA should cross-refer the Numident records. For benefit purposes, cross-referring permits the individual to get proper credit for all earnings reported on any of their SSNs. SSA has cross-referred approximately 10.3 million Numident records. Since March 1, 2013, when SSA discovers an individual has more than one SSN, it should allow only one of the SSNs to remain active and retire all other SSNs assigned to the individual to reduce the possibility of confusion, error, misuse, and fraud.

SSA matches death reports from various sources against its payment records and inputs this information on the Numident. Utilizing this data, SSA compiles a comprehensive file of death information, referred to as the full Death Master File (DMF), which it shares, as authorized, with federal benefit-paying agencies² to assist with the prevention and detection of fraud. As part of a Government-wide initiative to prevent and detect improper payments, beginning in December 2023, SSA has been required to share its full DMF with the U.S. Department of Treasury's Bureau of the Fiscal Service for use in its Do Not Pay initiative.³ SSA also provides a subset of the full file, known as the public, or Limited Access DMF, to the Department of Commerce, who, in turn, sells the data to both public and private customers.⁴ Financial institutions leverage this information to process financial, credit, payment, and other applications against the file to help prevent and identify fraud.

¹ Reasons include ongoing identity theft or threat of personal hardship, such as from domestic abuse. Also, before SSA centralized issuance of SSNs, individuals could obtain multiple SSNs upon request.

² Examples include but are not limited to the Internal Revenue Service; Departments of Veterans Affairs, Agriculture, and Defense; Centers for Medicare & Medicaid Services; Pension Benefit Guaranty Corporation; and Railroad Retirement Board.

³ Consolidated Appropriations Act of 2021, Pub. L. No.116-260, Sec. 801, December 27, 2020.

⁴ SSA, *POMS*, GN 03315.015A (January 6, 2017).

In July 2017, we reported SSA issued an estimated \$171 million in improper payments to about 2,000 beneficiaries who had multiple cross-referred SSNs, and addressing these discrepancies could prevent approximately \$21 million in improper payments over 12 months. We also reported that SSA recorded death information on approximately 2 million non-beneficiary individuals' Numident records but did not input death information on their cross-referenced SSNs.⁵ This prevented their death information from appearing in SSA's DMF/full file of death information. We referred these cases to SSA for corrective action and recommended SSA determine the feasibility of taking appropriate action to implement system controls to (1) ensure death information input on an individual's Numident record is also input on all the individual's cross-referred SSN(s) and (2) prevent simultaneous issuance of payments under cross-referred SSNs. SSA agreed to review and correct the records and stated it would consider the addition of system controls as part of future information technology modernization efforts based on resource availability.

Scope and Methodology

We obtained data from the Multiple Social Security Number Cross-Reference File that identified approximately 10.3 million individuals that SSA had cross-referred to at least 1 other SSN. From these SSNs, we:

- Identified 4,904 instances where SSA simultaneously issued Old-age, Survivors, and Disability Insurance (OASDI) benefits and/or Supplemental Security Income (SSI) payments under both cross-referred SSNs.
- Identified 10,623 current payment status beneficiaries⁶ whose cross-referred Numident records contained death information.
- Identified 666,008 current payment status beneficiaries whose cross-referred SSNs were assigned to living individuals who were not in current payment status.⁷
- Identified 2,370,247 individuals who were not in current payment status and did not have death information on the Numident whose SSNs were cross-referred to deceased individuals' records.

We randomly selected 100 instances from each category for review. For each sample case, we reviewed SSA Numident and payment records to determine whether cross-referred SSNs belonged to the same or different individuals, calculated improper payments, and estimated future improper payments over a 12-month period. See Appendix A for additional information on the scope and methodology for this review.

⁵ SSA, OIG, Cross-referred Social Security Numbers, A-06-13-23091, p. 7 (July 2017).

⁶ Throughout the report, "current payment status beneficiaries" refers to individuals who were receiving OASDI and/or SSI payments when we obtained our audit data in March 2022.

⁷ Throughout the report, "not in current pay status" refers to individuals who were not receiving OASDI or SSI payments when we obtained our audit data in March 2022.

RESULTS OF REVIEW

SSA issued improper payments under cross-referred SSNs and did not input death information on deceased individual's cross-referred Numident records. Our review determined SSA:

- Issued improper payments to beneficiaries simultaneously under both cross-referred SSNs.
 When calculating their benefit payments, SSA erroneously treated each beneficiary as two individuals and paid them more than they were entitled to receive.
- Issued improper payments to beneficiaries whose Numident records were erroneously cross-referred to other individual's records. SSA computed each beneficiary's payments based on the combined earnings of two different individuals and paid them more than they were entitled to receive.
- Issued improper payments to beneficiaries because it did not terminate their benefits after receiving their death information and posting it on their cross-referred Numident records.
- Received and input death information on deceased individuals' Numident records but did not record the death information on their cross-referred records.

Most of the discrepancies we identified during this audit were similar to findings we reported in 2017. Based on review of randomly selected cases, we estimate SSA issued approximately \$147 million in improper payments to 3,783 beneficiaries and will issue another \$23 million in improper payments over 12 months if these errors are not corrected. We also estimate SSA had death information for more than 2 million deceased individuals that it did not input on the Numident preventing DMF users, that rely on SSA's death information, from knowing the individuals were deceased.

Benefit Payments Issued Simultaneously Under Both Crossreferred Social Security Numbers

We identified 4,904 instances where SSA simultaneously issued payments to individuals under both cross-referred SSNs. We reviewed 100 randomly selected cases.

• In eight cases, the PII on the Numident indicated the cross-referred SSNs belonged to the same individual. In all eight cases, SSA did not consider benefits paid under one SSN when it computed benefits paid under the cross-referred SSN, so the sum of payments SSA issued to the beneficiary under both SSNs exceeded the amount to which the beneficiary was entitled. To illustrate, in July 2007, SSA began issuing widow's benefits to a woman under one of her two cross-referred SSNs. In 2014, the woman filed for, and began receiving, retirement benefits under her second SSN. In this situation, the woman was entitled to receive the higher paying benefit—the widow's benefits—but not both widows and retirement benefits.⁸ However, SSA paid her both widow's and retirement benefits as if she was two different people. We referred this case to SSA as part of our 2017 audit, yet it had not corrected this case when we obtained data for this review. SSA issued approximately

⁸ SSA, *POMS*, RS 00207.002, B (September 15, 2023).

\$83,000 in improper payments since our prior audit before it suspended the retirement benefits in May 2022.

- In 92 cases, PII on the individual's Numident indicated the cross-referred SSNs belonged to different individuals, SSA should not have cross-referred the SSNs, and SSA employees should have uncross-referred the SSNs before they awarded benefit payments.
 - In 64 cases, the erroneously cross-referred SSNs did not result in overpayments because SSA computed each beneficiary's payments based on each beneficiary's earnings.
 - o In 28 cases, SSA computed <u>each</u> beneficiary's payments based on the combined earnings of <u>both</u> cross-referred individuals, which resulted in overpayments. In 21 cases, it appeared SSA systems alerted employees the cross-referred SSNs belonged to 2 different individuals. However, instead of uncross-referring the records, SSA employees overrode the alerts, which caused SSA to calculate benefits payable to <u>each</u> individual based on <u>both</u> individuals' combined earnings. In the other seven cases, the PII on the cross-referred Numident records was similar enough that SSA systems did not generate alerts and technicians processing the claims did not appear to realize the cross-referred SSNs belongs to different individuals. To illustrate:
 - SSA erroneously cross-referred the Numident records of twin brothers born in 1954. SSA began issuing retirement benefits to both twins in April 2016. Because the twins had similar PII, system controls did not discern the cross-referred SSNs belonged to two different individuals. Circumstances indicate the technician who processed the first twin's retirement claim noticed the SSNs were erroneously cross-referred; but instead of uncross-referring the SSNs, the employee made an input that caused SSA systems to compute the first twin's benefits based solely on the first twin's earnings. However, the technician who processed the second twin's claim did not appear to notice the cross-referring error and allowed SSA systems to erroneously compute the second twin's benefits based on the combined earnings of both twins. As a result, we estimate SSA issued the second twin approximately \$53,000 in benefits to which he was not entitled and will issue another \$10,000 in improper payments over 12 months if this error is not corrected.
 - o SSA erroneously cross-referred SSNs belonging to individuals with the same first and last name, but different middle names, years of birth, and parents' names. We referred this case to SSA as part of our 2017 audit, but SSA hadn't taken corrective action when we obtained data for this audit in 2022. SSA earnings records showed one individual had nominal, sporadic earnings before filing for retirement in 2000. The other individual worked consistently from 1968 until filing for retirement in 2006. For unknown reasons, SSA employees who processed these benefit claims made inputs that caused the system to compute each beneficiary's payments based on both beneficiaries' combined earnings. These errors minimally affected benefits paid to the higher earner. However, from 2000 until SSA uncross-referred these SSNs in

Cross-referred Social Security Numbers (062308)

⁹ This case was in our audit population but not randomly selected for review. Therefore, we did not include the associated overpayments in our statistical projections.

January 2023, the lower earner and his spouse received approximately \$303,000 in retirement benefits to which they were not entitled.

Based on our sample results, we estimate SSA issued 1,765 beneficiaries approximately \$87 million in improper payments. If the Agency does not correct these errors, we estimate it will issue an additional \$14 million in improper payments over 12 months.

Beneficiaries Whose Numident Records Were Cross-referred to Deceased Individuals' Records

We identified 10,623 current payment status beneficiaries whose cross-referred Numident records contained death information. We reviewed 100 randomly selected cases.

- In 5 cases the PII on the Numident indicated the cross-referred SSNs belonged to the same individual.
 - o In two cases, SSA did not issue overpayments. In one case, SSA had only recently added death information to a beneficiary's cross-referred Numident record. The other case involved a widow who was receiving benefits on her deceased husband's record. SSA records indicate the widow is alive and that SSA erroneously input the husband's date of death on the widow's cross-referred Numident record.
 - o In the other three cases, it appeared the Numident death information was correct and that SSA issued the beneficiaries approximately \$87,000 in payments after death. Without corrective action, SSA will issue these beneficiaries approximately \$33,000 in additional payments after death over 12 months. To illustrate, In May 1989, a beneficiary with cross-referred SSNs began receiving widow benefits. In December 2019, SSA received and recorded death information on the beneficiary's cross-referred SSN but did not record the death information on her Numident record or terminate her benefit payments. Numident records for both SSNs included the same first and last name, date and place of birth, and parents' names. We estimate SSA issued approximately \$22,000 in payments after the beneficiary's death and will issue an additional \$11,000 in improper payments over 12 months if this error is not corrected.
- In 95 cases, PII on the Numident indicated the cross-referred SSNs belonged to different individuals. SSA should not have cross-referred the SSNs, and SSA should have uncrossreferred the SSNs before awarding benefit payments.
 - o In 79 cases, erroneous cross-referencing of the SSNs did not result in overpayments because SSA computed each beneficiary's payments based on each beneficiary's earnings or because little or no earnings were reported under the cross-referred SSNs.
 - In 16 cases, SSA erroneously computed <u>each</u> beneficiary's payments based on the combined earnings reported under <u>both</u> the beneficiary and the deceased individual's SSNs. This erroneous cross-referencing of SSNs resulted in overpayments totaling approximately \$473,000. Without corrective action, SSA will issue these beneficiaries approximately \$51,000 in additional payments after death over 12 months.
 - In 13 cases, SSA systems alerted employees that the cross-referred SSNs belonged to 2 different individuals. However, SSA employees overrode the alerts which caused SSA payment systems to calculate benefits payable to each individual based

on both individuals' combined earnings. To illustrate, SSA erroneously cross-referred a woman and man's Numident records, although they had different names, dates and places of birth, and parents' names. The man died in November 2011. In April 2019, the woman began receiving retirement benefits. SSA systems alerted the employee processing the claim that the woman's Numident record was cross-referred to a different individual's record. However, for unknown reasons, the employee processing the claim overrode the alert and caused the system to compute the woman's benefits based on both individuals' combined earnings. SSA issued the woman approximately \$8,000 in improper payments and will issue an additional \$3,000 in improper payments over 12 months if this error is not corrected.

o In the other three cases, the PII on the cross-referred Numident records were similar enough that SSA systems did not generate wrong account number (WAN) alerts and circumstances indicate that technicians processing the claims were not aware the cross-referred SSNs belonged to different individuals. To illustrate, SSA erroneously cross-referred SSNs belonging to two men born in different states to different parents. SSA records show that one of the men died in 2004. The other man began receiving disability benefits in 2018 and currently receives retirement benefits. Because the men had the same last name and date of birth, SSA systems did not alert the employee processing the claim that the man's Numident record was cross-referred to a different individual's record, so SSA computed the man's benefits based on both individuals' combined earnings. SSA has issued the man approximately \$19,000 in improper payments and will issue an additional \$4,488 in improper payments over 12 months if this error is not corrected.

Based on our sample results, we estimate SSA issued approximately \$59.5 million in improper payments to about 2,018 beneficiaries whose Numident records were cross-referred to deceased individuals' Numident records and that SSA will issue and additional \$8.9 million in improper payments over 12 months if these errors are not corrected.

Beneficiaries Whose Numident Records Were Cross-referred to Living Non-current Payment Status Individuals' Records

We identified 666,008 current payment status beneficiaries whose cross-referred SSNs were assigned to living¹⁰ individuals who were not in current payment status. We reviewed 100 randomly selected cases.

- In 94 cases, SSA did not issue improper payments because both cross-referred records appeared to belong to the same person.
- In six cases, SSA erroneously cross-referred two different individuals' Numident records.

¹⁰ We considered these individuals to be "living" because their Numident records did not contain death information at the time of our review. However, we did not verify whether these individuals were actually alive.

- In four cases SSA properly computed each beneficiary's payments based on each beneficiary's earnings or because few if any earnings were reported to SSA under the non-current payment status individuals' cross-referred SSNs
- o In two cases SSA erroneously computed <u>each</u> beneficiaries' benefits based on <u>both</u> individuals' combined earnings. In both cases, SSA systems alerted employees that the cross-referred SSNs belonged to two different individuals. However, SSA employees overrode the alerts and caused SSA payment systems to calculate <u>each</u> individual's benefits based on <u>both</u> individuals' combined earnings. To illustrate, SSA cross-referred the Numident records of two individuals with different names, dates and places of birth, and parents' names. In September 2007, SSA began paying retirement benefits to one of the individuals based on the combined earnings of both individuals. In these two cases, SSA issued approximately \$40,000 in improper payments and will issue an additional \$3,100 in improper payments over 12 months if it does not correct the errors.

Although we did not identify enough payment errors in our sample to allow us to accurately estimate improper payments made to these 666,008 beneficiaries, the 2-percent error rate in our sample cases indicates SSA is making similar payment errors to more than 13,000 additional beneficiaries.

Non-current Payment Status Individuals Whose SSNs Were Cross-referred to Deceased Individuals' Records

We identified approximately 2.4 million non-current payment status individuals who did not have death information on the Numident whose SSNs were cross-referred to deceased individuals' records. We reviewed 100 randomly selected cases, In 99 cases, PII on the Numident indicated the cross-referred SSNs belonged to the same individuals¹¹ and that both individuals were deceased.

Because the average year of birth on these individuals' Numident records was 1918 and none were receiving SSA payments, adding death information from one record to a cross-referred record containing the same PII presents a minimal risk of inadvertently adding death information to a living individual's record. Based on our sample results, we estimate SSA had death information for more than 2.3 million individuals it did not input on the Numident. Death information that does not appear on the Numident will not appear in the DMF. Taking action to include death information for millions of deceased individuals whose information is omitted from the DMF would enhance Government-wide improper payment prevention and detection.

System Controls

Although SSA established system controls that alert employees when a claimant has cross-referred SSNs, SSA can strengthen its controls.

SSA's policy prohibits simultaneous issuance of payments to individuals under both cross-referred SSNs; however, we identified approximately 4,900 cases where SSA was

¹¹ In 87 of 99 cases, the cross-referred Numident records contained identical names and dates of birth. In the other 12 cases, cross-referred Numident records contained similar names and/or dates of birth.

simultaneously issuing benefit payments under both cross-referred SSNs. SSA systems alert employees to the presence of a claimant's cross-referred SSNs. However, SSA systems do not have controls to prevent the simultaneous payment of benefits under both cross-referred SSNs, to alert employees that SSA is already issuing payments under a claimant's cross-referred SSN, or to alert employees when the cross-referred record contains death information.

SSA is aware that SSNs are erroneously cross-referred and has developed controls to prevent computation of one individual's benefits based on two individuals' combined earnings. However, as discussed in this report, our sample results identified cases where SSA erroneously computed one beneficiary's payments based on two different individuals' combined earnings. SSA systems alert employees that a claimant has cross-referred SSNs and verifies whether certain data elements (surname, date of birth, sex designation) on the cross-referred Numident records are consistent. If the cross-referred records appear to belong to different individuals, SSA systems generate a WAN alert that identifies differences in the cross-referred records. However, employees can override the alert and cause SSA systems to compute benefit payments based on the combined earnings reported under both cross-referred SSNs. SSA does not require that the employee provide support for overriding a WAN alert or require a second person to review or approve continued processing.

SSA policy also requires that erroneously cross-referred SSNs be uncross-referred. However, SSA did not develop controls to uncross-refer records belonging to different individuals, even after employees receive WAN alerts and confirm cross-referred SSNs belong to two different individuals. Finally, SSA does not have system controls to ensure that death information received for more than 2 million individuals under one of their assigned SSNs is also input on their cross-referred records. In 2017, SSA officials stated the Agency planned to address implementation of additional system controls as part of its IT Modernization Enumeration Domain. As of June 2024, SSA's plan remained unimplemented.

CONCLUSION

SSA can reduce future improper payments by improving controls over payments issued to beneficiaries with cross-referred SSNs, uncross-referring SSNs belonging to different individuals, and developing controls to ensure that when it records an individual's death information on the Numident, it also records the death information on the individual's cross-referred SSNs.

RECOMMENDATIONS

We recommend that SSA:

- Maximize technology (for example, develop automated program that compares Numident name, date of birth, sex designation, place of birth, parents' names) to identify all instances where two different individuals' Numident records are cross-referred and uncross-refer the records.
- 2. Review all cases where it simultaneously issues payments to beneficiaries under both cross-referred SSNs and take action to correct the records.

- 3. Review all cases where the Numident records of beneficiaries in current payment status are cross-referred to deceased individuals' Numident records and take action to correct the records.
- 4. Maximize technology (for example, develop automated program that compares Numident name, date of birth, sex designation, place of birth, parents' names) to review the 2.4 million non-current payment status beneficiaries whose cross-referred Numident records contain death information, and input death information on their cross-referred record, as appropriate.
- 5. Implement controls to prevent similar errors from occurring in the future.

AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix C.

Appendix A – **SCOPE AND METHODOLOGY**

To accomplish our objectives, we:

- Reviewed applicable federal law including sections of the Social Security Act and Social Security Administration (SSA) regulations, policies, and procedures.
- Reviewed relevant Office of the Inspector General reports.
- Obtained data in April 2022 from the Multiple Social Security Number Cross-Reference File in that identified approximately 10.3 million individuals that SSA had cross-referred to at least 1 other Social Security number (SSN). We matched the records against the Numident and March 2022 Master Beneficiary and Supplemental Security Records and identified:
 - 4,904 instances where SSA simultaneously issued Old-age, Survivors, and Disability Insurance (OASDI) benefits and/or Supplemental Security Income payments under both cross-referred SSNs.
 - 10,623 beneficiaries in current payment status whose cross-referred Numident records contained death information.
 - o 666,008 beneficiaries in current payment status whose cross-referred SSNs were assigned to living individuals who were not in current payment status.
- Obtained July 2022 Numident data File and matched the records against the March 2022
 Master Beneficiary and Supplemental Security Records and identified 2,370,247 individuals
 who were not in current payment status and did not have death information on the
 Numident, whose SSNs were cross-referred to deceased individuals' records.
- We randomly selected 100 instances for review for each category. For each sample
 instance, we reviewed SSA Numident and payment records to determine whether crossreferred SSNs belonged to the same or different individuals.
 - When available information indicated the cross-referred SSNs belonged to the same individual¹, we:
 - Calculated overpayment amounts as of March 2022, and
 - Estimated future improper payments based on amounts paid in April 2022 times 12 months.
 - When available information indicated the cross-referred SSNs belonged to different individuals, we reviewed SSA Informational/Certified Earnings Records to determine whether SSA computed benefit payments based on two individuals' combined earnings. If so, we:
 - Calculated overpayments as of March 2022, and
 - Estimated future improper payments based on amounts paid in April 2022 times 12 months.

¹ Our July 2017 report, *Cross-referred Social Security Number* (A-06-13-23091) calculated amounts until November 2015; therefore, in cases that were in our prior audit, we calculated overpayments from December 2015 to March 2022 and projected an additional 12 months from April 2022.

The entities audited were the field offices and program services centers under the Office of the Deputy Commissioner for Operations and the Offices of Retirement and Survivors Insurance Systems, Disability Systems and Applications and Supplemental Security Income Systems under the Office of the Deputy Commissioner for Systems. We assessed the significance of internal controls necessary to satisfy the audit objectives. 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 objectives. We identified the following Component and Principle as significant to the audit objectives:

- Component 3: Control Activities
 - o Principle 11: Design activities for the information system

We conducted our review from February 2023 to April 2024 in Dallas, Texas. We determined the data used for this audit were sufficiently reliable to meet our audit objectives. 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B – Sample Results and Estimates

We identified 4,904 instances where the Social Security Administration (SSA) simultaneously issued monthly Old-Age, Survivors, and Disability Insurance (OASDI) benefits and/or Supplemental Security Income payments under cross-referred Social Security Numbers (SSN). We reviewed 100 randomly selected cases.

Table B-1: Population and Sample Size

Description	Number of Cases
Population	4,904
Sample Size	100

SSA issued approximately \$1.8 million in improper payments in 36 cases. Based on our sample results, we estimate SSA issued approximately \$87 million in improper payments in 1,765 cases, and, without corrective action, SSA will issue another \$13.9 million in improper payments over 12 months.

Table B-2: Improper Payments in Sample

Description	Number of Cases with Improper Payments	Past Improper Payment Amounts	Future Improper Payment Amounts
Sample Results	36	\$1,774,500	\$283,736
Projected Quantity/Point Estimate	1,765	\$87,021,480	\$13,914,418
Projection Lower Limit	1,377	\$51,046,561	\$9,590,787
Projection Upper Limit	2,184	\$122,996,399	\$18,238,050

We also identified 10,623 instances where SSA issued OASDI and/or Supplemental Security Income payments to beneficiaries whose SSNs were cross-referred to SSNs that contained the individuals' death information. We reviewed 100 randomly selected cases.

Table B-3: Population and Sample Size

Description	Number of Cases
Population	10,623
Sample Size	100

SSA issued approximately \$560,000 in improper payments in 19 cases. Based on our sample results, we estimate SSA issued approximately \$59.5 million in improper payments in 2,018 cases and that without corrective action, SSA will issue another \$8.9 million in improper payments over 12 months.

Table B-4: Improper Payments in Sample

Description	Cases with Past Improper Payments	Past Improper Payment Amounts	Future Improper Payment Amounts
Sample Results	19	\$560,105	\$84,229
Projected Quantity/Point Estimate	2,018	\$59,499,997	\$8,947,668
Projection Lower Limit	1,364	\$20,621,229	\$4,583,679
Projection Upper Limit	2,824	\$98,378,764	\$13,311,656

In addition, we identified 666,008 instances where SSA was issuing payments to beneficiaries whose SSNs were cross-referred to SSNs of individuals who did not currently receive SSA payments or have death information on the Numident. We reviewed 100 randomly selected cases.

Table B-5: Population and Sample Size

Description	Number of Cases
Population	666,008
Sample Size	100

SSA issued \$40,050 in improper payments in two cases. Without corrective action, SSA will issue another \$3,098 in improper payments over 12 months. We did not project these sample results but note that, based on the 2-percent sample error rate, 13,320 cases (666,008 cases times .02 error rate) involve improper payments.

Table B-6: Improper Payments in Sample

Description	Sample Results
Cases with Past Improper Payments	2
Past Improper Payment Amounts	\$40,050
Estimated Improper Payments over 12 Months	\$3,098

Finally, we identified approximately 2.4 million individuals who did not currently receive SSA payments or have death information on the Numident whose records were cross-referred to deceased individuals' records. We reviewed 100 randomly selected cases.

Table B-7: Population and Sample Size

Description	Number of Cases
Population	2,370,247
Sample Size	100

In 99 cases, personally identifiable information on the Numident indicated the cross-referred SSNs belonged to the same individual¹ and that both individuals were deceased. Therefore, we estimate that SSA had death information for approximately 2.3 million individuals it had not input on the Numident.

Table B-8: Non-beneficiaries with Death Information on Cross-referred SSNs

Description	Number of Cases
Sample Results	99
Projected Quantity/Point Estimate	2,346,545
Projection Lower Limit	2,259,891
Projection Upper Limit	2,369,031

Cross-referred Social Security Numbers (062308)

¹ In 87 of 99 cases, the cross-referred Numident records contained identical names and dates of birth. In the other 12 cases, cross-referred Numident records contained similar names and/or dates of birth.

Appendix C – **AGENCY COMMENTS**



MEMORANDUM

Date: July 22, 2024 Refer To: TQA-1

To: Michelle L. H. Anderson

Acting Inspector General

From: Dustin Brown Dat 2. Low

Acting Chief of Starr

Subject: Office of the Inspector General Draft Memorandum "Cross-referred Social Security Numbers"

(062308) -- INFORMATION

Thank you for the opportunity to review the draft report. We agree with the recommendations. We continue to review our procedures and are exploring potential technological enhancements to improve the accuracy of our Numident records to promote program integrity and prevent improper payments.

Please let me know if I can be of further assistance. You may direct staff inquiries to Hank Amato at (407) 765-9774.



Mission: The Social Security Office of the Inspector General (OIG) serves the

public through independent oversight of SSA's programs and operations.

Report: Social Security-related scams and Social Security fraud, waste, abuse,

and mismanagement, at oig.ssa.gov/report.

Connect: OIG.SSA.GOV

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

Follow us on social media via these external links:

X @TheSSAOIG

Facebook: OIGSSA

YouTube: TheSSAOIG

Subscribe to email updates on our website.