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Description of document: Social Security Administration (SSA) Office of the Inspector General (OIG) Report: CIN A-06-10-20173
Follow Up: Personally Identifiable Information Made Available to the Public Via the Death Master File, March 2011

Requested date: 16-July-2012

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Principal Public FOIA Liaison
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SOCIAL SECURITY

May 3, 2013

Refer to:
S9H: AI5284

I am responding to your July 16, 2012 Freedom of Information Act (FOIA) request for a copy of an SSA OIG Report: CIN A-06-10-20173 Follow Up: Personally Identifiable Information Made Available to the Public Via the Death Master File 3/31/2011.

As requested, I am enclosing a copy of the subject OIG report totaling 21 pages. I am releasing 13 pages in full from the report. However, I am withholding in part 8 pages under FOIA Exemption 5 that protects the deliberative process. FOIA Exemption 5 protects advice, opinions, recommendations, predecisional discussion, and evaluative remarks that are part of the government decision-making process. Release of such predecisional advisory communications would harm the quality of agency decision-making and the policy of encouraging frank, open discussion among agency personnel before making a decision (5 U.S.C. §552 (b)(5)).

The most commonly invoked privilege within exemption 5 is the deliberative process privilege. The general purposes of this privilege are to prevent injury to the quality of agency decisions and to protect government agencies' decision-making processes. The deliberative process privilege allows agencies to freely explore alternative avenues of action and to engage in internal debates without fear of public scrutiny (Missouri ex rel. Shorr v. United States Army Corps of Engineers, 147 F.3d 708, 710 (8th Cir. 1998)). Exemption 5 protects not merely documents, but also the integrity of the deliberative process itself, where the exposure of that process could result in harm.

Also, I am withholding information on three pages that could be used to circumvent the law. Exemption 7(E) exempts from mandatory disclosure records or information compiled for law enforcement purposes when production of such records "would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law." This exemption encompasses traditional law enforcement of investigating and prosecuting offenses that have occurred, as well as preventative law enforcement and security, meaning the prevention of future illegal acts. Milner v. Department of the Navy, 131 S. Ct. 1259, 1572 (2011).

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Further, I am withholding information about several employees identified in this report. The information is exempt from disclosure under the FOIA (5 U.S.C. § 552). The FOIA does not require agencies to disclose information that would be a clearly unwarranted invasion of personal privacy (5 U.S.C. § 552(b)(6)).

If you disagree with this decision, you may appeal it. Mail the appeal within 30 days after you receive this letter to the Executive Director for the Office of Privacy and Disclosure, Social Security Administration, 617 Altmeyer Building, 6401 Security Boulevard, Baltimore, Maryland 21235. Mark the envelope "Freedom of Information Appeal."

Sincerely,

A handwritten signature in cursive script that reads "Dawn S. Wiggins".

Dawn S. Wiggins
Freedom of Information Officer

Enclosure

**OFFICE OF THE
INSPECTOR GENERAL**

Limited Distribution Report

*Follow-up: Personally Identifiable
Information Made Available to the Public
Via the Death Master File*

A-06-10-20173



**-- WARNING --
THIS REPORT CONTAINS RESTRICTED
INFORMATION FOR OFFICIAL USE.
DISTRIBUTION IS LIMITED TO AUTHORIZED OFFICIALS.**

March 2011

Mission

By conducting independent and objective audits, evaluations and investigations, we inspire public confidence in the integrity and security of SSA's programs and operations and protect them against fraud, waste and abuse. We provide timely, useful and reliable information and advice to Administration officials, Congress and the public.

Authority

The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:

- Conduct and supervise independent and objective audits and investigations relating to agency programs and operations.**
- Promote economy, effectiveness, and efficiency within the agency.**
- Prevent and detect fraud, waste, and abuse in agency programs and operations.**
- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.**
- Keep the agency head and the Congress fully and currently informed of problems in agency programs and operations.**

To ensure objectivity, the IG Act empowers the IG with:

- Independence to determine what reviews to perform.**
- Access to all information necessary for the reviews.**
- Authority to publish findings and recommendations based on the reviews.**

Vision

We strive for continual improvement in SSA's programs, operations and management by proactively seeking new ways to prevent and deter fraud, waste and abuse. We commit to integrity and excellence by supporting an environment that provides a valuable public service while encouraging employee development and retention and fostering diversity and innovation.

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SOCIAL SECURITY

MEMORANDUM

Date: March 31, 2011

Refer To:

To: The Commissioner

From: Inspector General

Subject: Follow-up: Personally Identifiable Information Made Available to the Public Via the Death Master File (A-06-10-20173)

**THIS REPORT CONTAINS RESTRICTED INFORMATION FOR OFFICIAL USE.
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OBJECTIVE

Our objective was to determine the status of corrective actions taken by the Social Security Administration (SSA) to address recommendations in our June 2008 report, *Personally Identifiable Information Made Available to the General Public Via the Death Master File (A-06-08-18042)*.

BACKGROUND

As a result of a *Freedom of Information Act*¹ (FOIA) lawsuit,² SSA maintains a record of reported deaths known as the Death Master File (DMF). The terms of the related consent judgment required that SSA make available to the Plaintiff, the Social Security number (SSN), surname, and date of death of deceased numberholders. As of December 2009, the DMF database contained detailed information on more than 89 million numberholders. SSA provides DMF data to the Department of Commerce's National Technical Information Service (NTIS). NTIS, in turn, sells the DMF data to public and private customers.

The accuracy of death data is a highly sensitive matter for SSA. Erroneous death entries can lead to benefit termination, cause severe financial hardship and distress to affected individuals, and result in the publication of living individuals' personally

¹ 5 U.S.C. § 552.

² *Perholtz v. Ross*, Civ. No. 78-2385 and 78-2386 (U.S. District Court for the District of Columbia 1980).

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Page 2 - The Commissioner

identifiable information (PII) in the DMF. When SSA becomes aware it has posted a death report in error, SSA deletes the erroneous death entry from the DMF.

In our June 2008 review, we determined that, from January 2004 through April 2007, SSA's publication of the DMF resulted in the breach of PII for more than 20,000 living individuals erroneously listed as deceased on the DMF and, in some instances, these individuals' PII was still available at the time of our audit for free viewing on the Internet. We recommended that SSA

1. work with the Department of Commerce to implement a risk-based approach for distributing DMF information, such as implementing a delay in release of DMF updates to give SSA time to correct most erroneous death entries;
2. limit the amount of information included on the DMF version sold to the public to the absolute minimum required and explore alternatives to inclusion of individuals' full SSNs;
3. initiate required breach notification procedures upon notification that it mistakenly included living individuals' PII in the DMF; and
4. provide appropriate notification to living individuals whose PII was released in error.

During the 36 months from May 2007 through April 2010, SSA deleted 36,657 numberholders' death entries from the DMF. We did not verify whether these individuals were alive at the time of our audit. However, SSA's records indicated 14,497 of the 36,657 individuals received SSA benefit payments in April 2010. The fact SSA paid benefits to individuals after deleting their death entries indicates SSA determined the individuals were alive. (See Appendix B for details about our scope and methodology.)

RESULTS OF REVIEW

Since our 2008 review, SSA had taken action in response to Recommendations 3 and 4, but did not take action in response to Recommendations 1 and 2.

SSA Addressed Recommendations 3 and 4
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SSA implemented procedures to report erroneous death entry-related PII breaches to the United States Computer Emergency Readiness Team (US-CERT)³ each week. SSA also hired a contractor to provide ongoing reviews of DMF exposure related to 26,930 individuals whose PII SSA inadvertently exposed from July 2006 through January 2009.⁴

³ US-CERT is the operational arm of the Department of Homeland Security's National Cyber Security Division—established to serve as the Government's cornerstone for cyber security coordination and preparedness.

⁴ Timeframe included 21 of the 36 months in our audit period.

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The contractor evaluated available data related to the 26,930 individuals for anomalous patterns that could identify organized misuse. SSA stated that, to date, the contractor has identified no organized misuse.

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SSA Did Not Implement Recommendations 1 and 2

SSA did not implement a risk-based approach for distributing DMF information, attempt to limit the amount of information included on the DMF version sold to the public, or explore alternatives to inclusion of individuals' full SSN. In response to our 2008 report, SSA indicated that, relative to the total number of death reports it processes each year, the number of death reporting errors was statistically insignificant. SSA officials acknowledged the Agency continues to make thousands of death reporting errors each year.

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SSA Continued to Publish Living Individuals' PII in the DMF

From May 2007 through April 2010, SSA's publication of the DMF resulted in the breach of PII for as many as 36,657 additional living individuals erroneously listed as deceased on the DMF. SSA made these individuals' SSNs; first, middle, and last names; date of birth; and State and ZIP codes of last known residences available to users of the DMF before learning they were not actually deceased.

SSA attempted to retract these disclosures by deleting the individuals' information from the DMF. While these deletions prevented the PII from being included in subsequent versions of the DMF, they had no effect on the PII previously made available to DMF subscribers. In some instances, these individuals' PII remained available at the time of our audit for free viewing on the Internet.

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RISK-BASED APPROACH FOR DISTRIBUTING DMF INFORMATION

In our June 2008 report, we recommended SSA work with the Department of Commerce to implement a risk-based approach for distributing DMF information.

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DMF Publication Continued to Result in PII Breaches

SSA continued to inadvertently expose the PII of thousands of living individuals each

From May 2007

through April 2010, SSA processed transactions to delete erroneous death entries from 36,657 numberholders' SSA records. SSA records indicated that as of May 2010, 14,497 of the numberholders were in current payment status, indicating SSA believed the individuals were alive. In 8,007 instances where available data contained both the erroneous death entry input and the deletion transaction, we found that SSA deleted 76 percent of the erroneous death entries within 3 months of input and 86 percent of the erroneous death entries within 12 months of input.

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Agency officials stated SSA decided not to implement our recommendation at the suggestion of its DMF Task Force.⁵

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An SSA official stated that government, financial, investigative, credit reporting organizations, medical researchers, and other industries use the DMF to identify potential identity theft and prevent fraud. By running their information against the DMF, and terminating, for example, a credit card, the financial community is able to prevent identity theft, fraud, waste, and abuse. Pension, annuity, workers' compensation, unemployment, and other benefit plans use the DMF to detect improper payments sent to deceased persons. Banks, savings and loan associations, and credit unions can be held liable for money withdrawn from the accounts of deceased persons. This too helps them prevent fraud by identifying deceased individuals. Loans and credit cards issued in the name of a deceased person are almost impossible to recover.

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⁵ The Task Force included representatives from SSA's Offices of the Chief Information Officer, Communications, the General Counsel, Systems, Operations, and Income Security Programs.

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Deletion Transactions Did Not Remove PII from the Public Domain

SSA's efforts to delete erroneous death entries from the DMF did not completely mitigate the exposure of living individuals' PII. We randomly selected 100 instances where SSA deleted living individuals' erroneous death entries from the DMF. In June 2010, 2 to 37 months after SSA deleted the death entries, we searched the following three Internet sites that make DMF information available to the public at no charge to determine whether sampled individuals' PII remained accessible on the Websites.

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Our review indicated that months after SSA deleted the information from the DMF, the PII of 6 percent of the sampled living numberholders remained available for viewing on at least one of the Websites.⁶ While the frequency of these discrepancies has declined from 28 percent of cases reviewed during our original review,⁷ these errors continue to persist. Our sample results indicated that in five of the six instances, the continued PII exposure occurred on the [redacted] b7E [redacted]. This likely occurred because the particular Website is not timely processing DMF updates.

LIMITING INFORMATION ON PUBLIC VERSION OF THE DMF

Office of Management and Budget (OMB) Memorandum M-07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*, directs Federal agencies to reduce the volume of PII to the minimum necessary for the proper performance of a documented agency function and to reduce the use of SSNs and explore alternatives for use of SSNs as personal identifiers.⁸ In our June 2008 report, we recommended that SSA limit the amount of information included on the DMF version sold to the public to the absolute minimum required and explore alternatives to inclusion of individuals' full SSNs.

⁶ On average, the PII of these numberholders could be viewed on the Internet 27 months after SSA deleted the death entry from the DMF.

⁷ One possible explanation for the improvement could be that SSA and NTIS release weekly updates to DMF subscribers.

⁸ OMB M-07-16, *supra*, Attachment 1 §§ B.1.a. at page 6 and B.2.a. and b. at page 7.

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SSA chose not to limit the information included in the DMF version sold to public customers to the absolute minimum required or to explore alternatives to inclusion of the full SSN. Instead, SSA continued to disclose far more detailed PII in the DMF than required under the original consent judgment that resulted in the creation of the DMF. Under the terms of the consent judgment, SSA was to compile a list that identified deceased numberholders' SSNs, surnames (last names), and dates of death. However, since that time, SSA has expanded the amount of information published in the DMF to include first and middle names and the numberholders' dates of birth.

PII Included in the DMF	
Data Elements Required by the 1980 Consent Judgment	Data Elements Currently Provided by SSA
SSN	SSN
Date of Death	Date of Death
Last Name	Last Name
	First Name
	Middle Name
	Date of Birth
	Residential State
	Residential Zip Code

During our June 2008 audit, Agency officials stated SSA incorporated the additional personal information into the DMF based on subscriber requests. However, we could not confirm this because SSA did not maintain any supporting documentation. SSA decided not to implement our recommendation at the suggestion of the DMF Task Force.

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ADDITIONAL CONSEQUENCES OF DEATH REPORTING ERRORS

DMF update files provide easy access to an abundant source of living individuals' PII.

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About 1,000 times each month, SSA removes a numberholder's death entry from the DMF. Our audit results indicate that in a large number of instances, SSA deletes death entries because it becomes aware that an individual it previously reported as deceased is not actually dead. SSA and NTIS openly acknowledge these errors in a disclaimer that appears on NTIS' DMF Webpage (www.ntis.gov/products/ssa-dmf.aspx).

Social Security Administration's Death Master File

NTIS is the only authorized official distributor of the Death Master File on the Web.

Disclaimer: The products advertised on this website contain the complete and official Social Security Administration (SSA) database extract, as well as updates to the full file of persons reported to SSA as being deceased. SSA authorizes the use of this database as an identity verification tool, but notes that the Death Master File (DMF) may contain inaccuracies. Thus, SSA cannot guarantee the accuracy of the DMF. Therefore, the absence of a particular person on this file is not proof that the individual is alive. Further, in rare instances it is possible for the records of a person who is not deceased to be included erroneously in the DMF.

Each week, SSA creates an electronic DMF Update File that identifies new deaths, changes, and deletions to the DMF.⁹ SSA provides the weekly update file to NTIS for distribution to DMF customers. DMF customers, in turn, are expected to process the files against their DMF data. This update process allows DMF customers to keep their DMF data current without continually receiving/replacing the entire DMF database.

However, deletion transactions in DMF update files also provide DMF customers with the SSNs; first, middle, and last names; dates of birth; and address information for thousands of living numberholders.

⁹ Update file record specifications are the same as the full DMF except that the usual blank position "1" contains an "A" (add to the DMF), a "C" (change a part of the DMF record), or a "D" (delete from the DMF).

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"Do Not Pay List"

In June 2010, the President issued a memorandum¹⁰ directing Heads of Executive Departments and Agencies to ensure that a thorough review of available databases with relevant information on eligibility occurs before the release of any Federal funds, to the extent permitted by law. One of the databases specified in the Presidential Memorandum was the DMF. Consequently, the potential for immediate negative consequences is increased for thousands of innocent victims of SSA's death reporting errors. DMF reporting errors will force the affected individuals to convince Federal agencies that SSA's information is incorrect before Federal payments can be resumed.

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CONCLUSION AND RECOMMENDATIONS

While SSA has taken action to report PII breaches to US-CERT, SSA has not taken action to prevent PII breaches caused when living individuals' personal information is erroneously included in the DMF or limit the amount of personal information included in the DMF. SSA continues to process, on average, more than 1,000 death entry deletions each month resulting in the disclosure of thousands of living individuals' PII each year. SSA's attempts to mitigate these PII breaches were not completely effective in removing the PII from the public domain. SSA continued to publish the DMF with the knowledge its contents included the PII of living numberholders.

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As a result, we recommend that, until such time that the Agency can ensure the validity of all DMF death entries, SSA:

1. Implement a risk-based approach for distributing DMF information. At a minimum, SSA should delay release of DMF updates for public customers by a number of months to give SSA time to correct most erroneous death entries.
2. Limit the information included in the DMF version sold to the public to the absolute minimum required and explore alternatives to inclusion of the full SSN.

AGENCY COMMENTS AND OIG RESPONSE

SSA disagreed with both recommendations (see SSA's comments in Appendix C). SSA stated that in June 2008, it measured the risks and benefits and decided not to implement Recommendation 1. SSA cited sources that advocated timely transmittal of

¹⁰ Presidential Memorandum—*Enhancing Payment Accuracy Through a "Do Not Pay List,"* dated June 18, 2010.

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DMF data to the financial services industry for use in preventing fraud and identity theft as justification for immediate release of DMF information to public customers. ...

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We recognize the delicate balance that exists between speed and convenience, on one hand, and accuracy and security on the other.

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SSA also disagreed with Recommendation 2. SSA stated it could not limit the information included in the DMF version sold to the public to the absolute minimum required or explore alternatives to inclusion of the full SSN because deceased individuals do not have privacy interests. SSA stated the number of errors is small relative to the number of death transactions processed each year. SSA further stated that, to date, it has uncovered no evidence to indicate SSN misuse for the living individuals whose PII was erroneously published in the DMF.

We agree that deceased individuals do not have privacy interests. †

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We are encouraged that SSA has found no evidence of past misuse of DMF data.



Patrick P. O'Carroll, Jr.

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Appendices

APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Agency Comments

APPENDIX D – OIG Contacts and Staff Acknowledgments

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Appendix A

Acronyms

DMF	Death Master File
FOIA	<i>Freedom of Information Act</i>
NTIS	National Technical Information Service
OMB	Office of Management and Budget
PII	Personally Identifiable Information
SSA	Social Security Administration
SSN	Social Security Number
U.S.C.	United States Code
US-CERT	United States Computer Emergency Readiness Team

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Appendix B

Scope and Methodology

To accomplish our objective, we:

- Reviewed Federal laws on disclosure of personal information.
- Reviewed the Office of the Inspector General report, *Personally Identifiable Information Made Available to the General Public Via the Death Master File* (A-06-08-18042), June 2008.
- Reviewed Office of Management and Budget guidance on *Safeguarding Against and Responding to the Breach of Personally Identifiable Information* as well as the Social Security Administration's (SSA) policies and procedures related to erroneous death terminations and release of personally identifiable information.
- Analyzed 36,657 instances where SSA removed death entries from the Death Master File (DMF) between May 2007 and April 2010. We identified 15,006 deletions from the DMF (representing 14,497 numberholders) for beneficiaries/recipients who were receiving benefits as of April 2010.
- Analyzed time between the addition to, and the deletion from, the DMF for 8,007 of 15,006 deletion transactions (death entry addition dates were not recorded on available data files for the remaining transactions).
- In June 2010, we selected a random sample of 100 of the 14,497 numberholders. For each sampled individual, we searched free Internet Websites to determine whether the living beneficiaries' personally identifiable information could still be viewed at the time of our audit.

We performed our audit from June through October 2010 in Dallas, Texas. We did not test the general or application controls of SSA's systems that generated electronic data used for this audit. Instead, we performed other validation tests and found the data to be sufficiently reliable to meet our audit objectives. The entity audited was the Office of the Deputy Commissioner for Operations. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

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Appendix C

Agency Comments

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SOCIAL SECURITY

MEMORANDUM

Date: March 15, 2011

Refer To: SIJ-3

To: Patrick P. O'Carroll, Jr.
Inspector General

From: Dean S. Landis /s/
Deputy Chief of Staff

Subject: Office of the Inspector General (OIG) Draft Report, "Follow-up: Personally Identifiable Information Made Available to the General Public Via the Death Master File" (A-06-10-20173)-
-INFORMATION

Thank you for the opportunity to review the subject report. Please see our attached comments.

Please let me know if we can be of further assistance. Please direct staff inquiries to Chris Molander, at extension 57401.

Attachment:
SSA Response

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COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "FOLLOW-UP: PERSONALLY IDENTIFIABLE INFORMATION MADE AVAILABLE TO THE GENERAL PUBLIC VIA THE DEATH MASTER FILE" A-06-10-20173

Thank you for the opportunity to review the subject report. We offer the following responses to your recommendations.

Recommendation 1

Implement a risk-based approach for distributing DMF information. At a minimum, SSA should delay release of DMF updates for public customers by a number of months to give SSA time to correct most erroneous death entries.

Response

We disagree. We considered this in June 2008, measured the risks and benefits, and decided not to implement your recommendation.

Shortly after the 9/11 tragedy, on November 8, 2001, we testified before the Subcommittee on Oversight and Investigations, Committee on Financial Services, and the Subcommittee on Social Security, Committee on Ways and Means. At that joint hearing, "Preventing Identity Theft by Terrorists and Criminals," then Chairwoman Sue W. Kelly, Subcommittee on Oversight and Investigations, advocated a "rapid transmittal of the information in the Death Master File from the Social Security Administration to the financial services industry and the immediate use of that information by the industry." She stated further, "We need the Social Security Administration to take bold and immediate action to get the information to the financial services industry." Other congressional representatives expressed similar wishes. You may view the hearing transcript in the following attachment.



11-8-01 joint
hearing.pdf

The Government Accountability Office (GAO) also testified and in its written testimony (<http://www.gao.gov/new.items/d02233t.pdf>) stated, "timely receipt of death information and prompt updating of financial data are key factors in the financial industry's ability to prevent fraud and identity theft involving the SSNs of deceased individuals." GAO added, "SSA ... could improve the timeliness of the distribution of the Death Master File." We acted on Congress's and GAO's recommendations and now issue weekly updates to the DMF. Public and private organizations rely on the DMF to combat fraud and identity theft, and to be effective, they must have up-to-date information.

Your predecessor, James G. Huse, testified at the November 8, 2001 hearing that, "We are faced with striking a balance between speed and convenience, on the one hand, and accuracy and security on the other." We strike that balance.

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Recommendation 2

Limit the information included in the DMF version sold to the general public to the absolute minimum required and explore alternatives to inclusion of the full SSN.

Response

We disagree. As you discuss on page 2, the 1980 consent judgment (*Perholtz v. Ross*) requires us to make DMF data available to requesters. Under *Perholtz*, we must provide the date of a person's death, their surname, and their Social Security number (SSN).

We cannot "limit the information included in the DMF version sold to the general public." The Freedom of Information Act (FOIA), 5 U.S.C. 552, formed the basis for the *Perholtz* consent judgment. Under FOIA, agencies must disclose requested information unless the information requested meets any one of nine specific exemptions listed. Exemption 6 protects information about individuals in "personnel and medical files and similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." 5 U.S.C. 552(b)(6). However, since a deceased individual does not have privacy interest, this exemption does not apply.

The DMF contains more than 92 million records, and approximately 2.5 million are added each year. Living individuals are sometimes included in the DMF, however, it is a relatively small number – possibly 1,000 cases per month. We act to correct these situations swiftly. To date we have uncovered no evidence of any misuse of that data. We have weighed this against the overall public interest served, and it is appropriate for us to continue providing full DMF information to the public.

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Appendix D

OIG Contacts and Staff Acknowledgments

OIG Contacts

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Acknowledgments

In addition to those named above:

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DISTRIBUTION SCHEDULE

Commissioner of Social Security

Chairman and Ranking Member, Committee on Ways and Means

Chairman and Ranking Minority Member, Subcommittee on Social Security

Majority and Minority Staff Director, Subcommittee on Social Security

Chairman and Ranking Minority Member, Committee on Oversight and Government Reform

Chairman and Ranking Minority Member, Committee on Finance

Social Security Advisory Board

Overview of the Office of the Inspector General

The Office of the Inspector General (OIG) is comprised of an Office of Audit (OA), Office of Investigations (OI), Office of the Counsel to the Inspector General (OCIG), Office of External Relations (OER), and Office of Technology and Resource Management (OTRM). To ensure compliance with policies and procedures, internal controls, and professional standards, the OIG also has a comprehensive Professional Responsibility and Quality Assurance program.

Office of Audit

OA conducts financial and performance audits of the Social Security Administration's (SSA) programs and operations and makes recommendations to ensure program objectives are achieved effectively and efficiently. Financial audits assess whether SSA's financial statements fairly present SSA's financial position, results of operations, and cash flow. Performance audits review the economy, efficiency, and effectiveness of SSA's programs and operations. OA also conducts short-term management reviews and program evaluations on issues of concern to SSA, Congress, and the general public.

Office of Investigations

OI conducts investigations related to fraud, waste, abuse, and mismanagement in SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, third parties, or SSA employees performing their official duties. This office serves as liaison to the Department of Justice on all matters relating to the investigation of SSA programs and personnel. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

Office of the Counsel to the Inspector General

OCIG provides independent legal advice and counsel to the IG on various matters, including statutes, regulations, legislation, and policy directives. OCIG also advises the IG on investigative procedures and techniques, as well as on legal implications and conclusions to be drawn from audit and investigative material. Also, OCIG administers the Civil Monetary Penalty program.

Office of External Relations

OER manages OIG's external and public affairs programs, and serves as the principal advisor on news releases and in providing information to the various news reporting services. OER develops OIG's media and public information policies, directs OIG's external and public affairs programs, and serves as the primary contact for those seeking information about OIG. OER prepares OIG publications, speeches, and presentations to internal and external organizations, and responds to Congressional correspondence.

Office of Technology and Resource Management

OTRM supports OIG by providing information management and systems security. OTRM also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, OTRM is the focal point for OIG's strategic planning function, and the development and monitoring of performance measures. In addition, OTRM receives and assigns for action allegations of criminal and administrative violations of Social Security laws, identifies fugitives receiving benefit payments from SSA, and provides technological assistance to investigations.