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## SOCIAL SECURITY

Refer to:

S9H: AR2496

July 12, 2017

This letter is in response to your December 28, 2016 Internet Freedom of Information Act (FOIA) request for the 2003 SSN Verification: Policy, Process, and Recommendations – A report of the SSN Verification Sub-Team to the Enumerations Response Team.

Please see the enclosed file (a 59 page report) in response to your request. I am withholding 8 pages in full and portions of the remaining pages pursuant to FOIA Exemptions 5 and 7(E).

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Sincerely,

A handwritten signature in black ink, appearing to read 'Monica Chyn', with a stylized, flowing script.

Monica Chyn  
Acting Freedom of Information Officer

Enclosure

# **SSN Verification: Policy, Process, and Recommendations**

***A REPORT OF THE  
SSN VERIFICATION SUB-TEAM***

***TO THE  
ENUMERATION RESPONSE TEAM***

**SEPTEMBER 2003**

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## **EXECUTIVE SUMMARY**

The ERT SSN Verification Sub-team spent the last several months examining the processes SSA uses to verify social security numbers (SSN). It became very clear that maintenance of the current SSN verification processes is labor intensive and limits our ability to manage them. Also, the increasing need for variations of these services by new users further exacerbates the resource problem and limits our ability to make improvements. In addition, the existing oversight controls present possible risks of improper disclosure.

We note there is a large and quite complex body of law, regulation, policy, General Counsel opinions, and Commissioner's Decisions the combination of which determines what we can provide to our user community and there is an equally large and complex conglomerate of systems routines and programs in place collectively providing that information. We identified many changes that might be offered to make our SSN verification processes more responsive and provide better information but we also found that making those changes might include prohibitive costs while providing only short term "Band-aid" kinds of improvements. While our SSN verification processes are currently functional, we found them to be relatively inflexible and, as a result, less than fully responsive to changing user needs, rapidly growing workloads, and frequent new legal mandates. We need an overall plan for SSN verification and the processes used to produce them need to be redesigned to more efficiently meet the needs of SSA and our user communities.

The sub-team identified a number of changes that could be recommended for a large number of routines and we attempted to categorize and prioritize them. As part of our discussion we were made aware that what appeared to be comparatively simple changes intended to be applied to all of the routines are, in fact, quite complex to implement given the multiple routines. While the group felt the addition of several changes to many separate routines was a basic recommendation, we believe that the advantages to be gained through those changes would not warrant the length of time and resource commitments required to make them happen. In addition, a large number of routines is difficult to maintain and the current processes are not designed to take full advantage of telecommunications technology.

We believe that, though we have the option of making incremental relatively expensive changes to the conglomerate of routines we currently work with, the better course might be to make carefully selected, high impact/low cost changes to certain routines now, while at the same time, pursuing the creation of an entirely new comprehensive SSN verification system designed to respond to today's accelerating needs using the advanced technology available to us.

We offer the following for consideration:

- 4 Interim, high-impact/low cost actions,
- 2 Major Recommendations, and
- 2 Collateral Recommendations.

**Interim, high-impact/low cost actions:**

1. We recommend elimination of four routines which are not being used currently.
2. We recommend application of Single Select to all employer verifications including online SSNVS.
3. We recommend registered users who have not accessed information for the past [REDACTED] be purged from the rolls of approved users.
4. We recommend the update of registration information for current users as the opportunity to do so presents itself.

**Major Recommendations**

1. We recommend that the SSA develop a robust new SSN verification system for all customers.
2. We recommend that SSA develop an automated SSN verification registration and control process.

**Collateral Recommendations**

1. We recommend that SSA proactively maintain the NUMIDENT record, updating it to reflect the correct legal name, date of birth, and other changes as mismatches are discovered and documented.
2. We recommend that SSA provide re-education of the general public regarding personal information and its accuracy and timeliness filed with SSA as well as with employers regarding the SSN verification services that we provide.

## **Introduction**

In its intensive work on SSN policies and practices, the Enumeration Response Team (ERT) became aware of the numerous SSN verification processes (EVS, SSNVS, SSOLV, SVES, etc.) that SSA provides, the reliance on those processes by a myriad of groups, and the growing number of requests SSA receives. In order to better understand the verification processes, the ERT chartered the Verification Sub-team to review the SSN verification processes that are provided to outside agencies and organizations. The purpose was to identify vulnerabilities, to determine the consistency and effectiveness of the policies and processes, and to develop recommendations to improve their effectiveness.

The sub-team began by conducting an intensive analysis and documentation of the complex set of disclosure laws, regulations and SSA policies related to SSN disclosure and verification. While SSA has long been implementing disclosure policies by applying them to SSN verifications, those policies had not been compiled in a way that would permit easy reference for understanding their overall impact on SSN verification or when analyzing new requests. In order to provide a common understanding for the workgroup, and a reference for future use by the Agency, the Office of General Counsel, Office of Public Disclosure thoroughly researched and documented the disclosure policy as it relates to SSN verification and the resulting paper is part of this document.

Our next step was an analysis and documentation of the routines that exist today to provide SSN verification to third parties. There are a number of routines that have been developed over the years that reflect the variety of purposes and policies. The routines use different processes, provide varied responses and are available via different access modes. The information on the routines was collected and documented to allow an intensive analysis and to provide a reference for future users. It is also attached to this document.

The sub-team identified several factors and risks associated with SSN verifications that are pertinent to the analysis and recommendations, including:

- 500 million SSN verifications provided annually through various routines.
- 1600 users, and growing.
- (b) (7)(E) processes to provide SSN verification.
- The number of processes makes changes difficult, requiring excessive workyears to satisfy the need.
- (b) (7)(E)
- Limited systems security tools built into the processes.
- Growth of users and routines combined with inadequate controls makes effective management increasingly problematic.

After documenting the policy, examining the existing routines and identifying the realities of this business process, the sub-team considered how this business process



could be improved. We identified several areas of possible improvement that are detailed later in this paper.

We must also acknowledge that there is currently a Disclosure Workgroup led by the Office of Systems that is working on issues related to electronic data disclosures. The Verification Sub-team has endeavored to stay apprised of the work of that group in order to compliment their work while avoiding duplication of effort. One area of interest to the Disclosure Workgroup is the issue of SSA's charging for electronic data exchange services such as SSN verification. Therefore, the Verification Sub-team did not address that issue. It is expected that the changes defined by the Verification Sub-team and any of the recommendations that are adopted will be complimentary to the work of the Disclosure Workgroup.

### **Law and Agency Disclosure Policy**

The privacy of all the personal information SSA maintains in its data bases is protected and controlled by the Social Security Act, the Privacy Act, the Freedom of Information Act, Social Security regulation, SSA policies, General Counsel opinions, and Commissioner's Decisions specifically addressing privacy of information. All of our privacy related operating rules, based on those laws, regulation, policies, opinions, and decisions have evolved over a long period of time and are very complex. Members of our workgroup from the Office of Public Disclosure (OPD) prepared extensive explanations of them (as they pertain to SSN verification) as part of the scope of our effort. Those explanations:

*Discussion of Policy Concerning Disclosures of Social Security Information by the Social Security Administration*  
and  
*SSN Disclosure Policy – A Summary Chart*

may be found at tab A of this document. A very quick summing up would observe that:

- SSA may disclose an SSN previously unknown to the requester when law allows that disclosure.
- In other instances, SSA is limited to verifying that the SSN and name and any other information provided by the requester does or does not match.
- If there is no legal, regulatory, or policy authority to either disclose or verify, SSA may release information to a third party if that third party presents an acceptable signed consent from the individual about whom information is sought.
- Finally, SSA must, under the terms of the Privacy Act, provide the individual access to his or her own information.

When SSA is approached by an organization seeking SSN verification information, we either know immediately if we can provide the service because of the type of organization we are talking to or we consult with OPD seeking a determination regarding precisely what, if anything, may be provided. Decisions are made and actions are taken

to deny the request or comply with it and start the information flow. In addition to the considerations above, new laws are passed which specifically require SSA to provide certain information to particular entities. As more and more of these kinds of laws are passed and new kinds of organizations make requests, the job of determining “who gets what” grows in complexity. Documenting these decisions also becomes more complex and requires recordation and control. Periodic examination of “who is receiving what” is desirable because laws and policies change, inadvertent changes and mistakes can occur, any of which might result in improper disclosure of information.

## **Different Users and Uses**

SSA must make SSN verification disclosure decisions for any organization that approaches us with a request. Our obvious primary customer for this information is employers. They need the information to make sure they are reporting wage information properly for the people in their employ. SSA, in turn, is very interested in facilitating this process because it is our core business. SSA, employers, and employees all benefit when this process runs smoothly. Fewer wage records end up in the suspense file and more people are paid the correct benefits when they qualify for them. We provide SSN verification service to employers of all shapes, sizes, and system capabilities. But that is only the tip of the “SSN verification iceberg.”

Many Federal, State, and local agencies receive SSN verification services for all sorts of reasons from issuing food stamps to tracking down convicted felons. Some of the agencies receive information as a result of legislation. These organizations include but are not limited to:

- The Department of Education
- The Department of Justice
- The Office of Child Support Enforcement
- The Internal Revenue Service
- The Department of Veterans Affairs
- The Selective Service System
- Any Federal agency which uses the SSN as a numerical identifier in their record system
- Federal, State, and local agencies for validating the SSN used in administering income or health maintenance programs
- Federal, State, and local agencies where SSN use is authorized under Federal statute and they are involved in programs such as Temporary Assistance for Needy Families, Food Stamps, Medicaid, and Unemployment Insurance
- State Motor Vehicle Agencies
- Prisons
- Law enforcement fugitive felon operations
- Our own SSA OIG.

We also receive requests for SSN verification from third parties with the consent of the individuals involved. This is an area that is getting more and more attention because of perceived profit potential by private businesses. Most recently, SSA became involved in a pilot program to test the viability of providing SSN verification to third party businesses representing other businesses needing SSN verifications...in this case mortgage and re-financing businesses. They had consent and we provided verifications. Setting up the machinery for this pilot, which may or may not result in a permanent new service, required significant effort from SSA. Such activity represents entirely new business for us...business that has nothing to do with our core mission. We are aware that the banking and insurance industries as well as others may want similar services.

We are also in the discussion/negotiation stage with components of the new Department of Homeland Security, Department of State, and other security related agencies to provide SSN verifications for them. We don't yet know for certain what they want but we know they will want something from us and that it is likely to be unique.

The bottom line here is that many diverse organizations either have SSN verification services or are clamoring for them and more requesters pop up with regularity. This is a growth area for SSA whether we are comfortable with it or not. While some of the requests can be denied easily; many others require consideration and compliance. Some agencies have statutory authority to receive a lot of information while other organizations are allowed only the barest "yes/no" responses from our systems and there are gradations in between. This means that different organizations have different levels of authority to receive information from us and that, in turn means, that one or two simple routines cannot begin to satisfy the legitimate needs these requesters present to SSA.

### **Proliferation of Routines**

We began our SSN verification service modestly with 1 or 2 routines satisfying the need while providing little information. The increase in users, and their different needs and authorities, has led to a proliferation of SSN verification routines and to many twists and turns in how those routines produce their results. Part of this growth might be attributed to expedience. Routines were modified to meet new needs and became necessary stand-alone processes. Much of the growth was based on policy decisions or changes in law that required some new mix of information be provided to a particular user.

In any case, SSA's current SSN verification operation has been cobbled together over a long period of time and it works...for now. It consists of:

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(b) (7)(E)

- Routines are difficult to change and update because all of their functions are not clearly/readily understood. As a result, flexibility to make changes is limited.
- (b) (7)(E) tolerances are applied to all of these routines.
- Some routines provide certain information in addition to SSN verification.

Of particular interest are the newer routines and processes that provide real time replies to requests for SSN verification. (b) (7)(E)

(b) (7)(E) These are distinct from the batch EVS processes, and are not accessed directly by end users but rather, are “called” by other programs such as SSNVS which is used by employers, and SSOLV which is used by Departments of Motor Vehicles. While these real time tools can be very valuable to support particular business purposes, they cannot replace the batch EVS processes.

(The attachment at tab B provides a chart showing the distribution of information among the routines as well as the special search processes that apply to each routine. The spreadsheet also shows what groups have access to the routines.)

- *With regard to unused EVS routines...*

As mentioned above, (b) (7)(E) of our existing EVS routines have fallen into disuse. Routines (b) (7)(E) appear to be identical and only (b) (7)(E) has users assigned to it. Some of these routines were developed to support different input media, such as paper, which are no longer used. The others are dormant. The same situation exists with routines (b) (7)(E). They appear to be identical; (b) (7)(E) is dormant. We believe that, while their existence and lack of use appears benign, the fact that they are “there” suggests they might, or at least could be considered for use in the future. Without an in-depth understanding of their functions, it seems improper to consider using them. There are also costs associated with maintaining these routines. We recommend permanent retirement of their code. We also recommend that all routines be reviewed to identify approved users who have not accessed information for (b) (7)(E) and that they be purged from the approved user rolls.

- *With regard to the specialized search processes...initial decision to allow use of these specialized routines by particular users are always rendered by OPD...*

(b) (7)(E)

(b) (7) (E)

The EVS routine used by employers [REDACTED] (b) (7)(E)

[REDACTED] Employers also use SSNVS [REDACTED] (b) (7)(E)

This creates a situation where inconsistencies may occur. Since the Office of General Counsel has informed us that release to employers of SSNs identified through the use of single select represents a permitted disclosure under law, we believe it may be advisable to consider [REDACTED] (b) (7)(E). Doing so would allow identification of correct SSNs in approximately 2% more instances, avoid possible inconsistencies in our responses, and assist in wage posting operations.

**No surname** is a specialized search routine which ignores the surname offered and attempts to make a match using only the first name and the other information provided. Use of this process is limited to needs-based program users and is appropriate there because the organizations receiving this information have very broad access authorization.

**ALPHIDENT** is a specialized search routine. The Alphident is literally the SSN master file indexed by [REDACTED] (b) (7)(E). [REDACTED] (b) (7)(E)

The routine searches the Alphident when no SSN is provided by the requester, or when no match is found on the Numident for the data provided by the requester. Only certain pre-approved users are entitled to use this routine.

[REDACTED] (b) (7)(E)  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

With regard to the specialized search processes we have discussed, we believe that, with the exception of the one recommended change regarding the addition of single select to SSNVS, their use is appropriate and should be undisturbed.

- *With regard to name and date of birth tolerances...*

In addition to the large number of routines and specialized search processes accompanying them, there are (b) (7)(E) which apply to each routine. These tolerances have evolved over the years and were designed primarily to compensate for clerical kinds of errors. We have attached a copy of the tolerances as they apply to the EVS routine used by employers at tab D. While it is believed that these tolerances probably apply to all the other routines equally, they may vary slightly from routine to routine. We cannot make the firm statement that they do not vary without careful examination of each of the other routines...a very resource intensive process we felt to be inappropriate at this time.

Examination of the tolerances suggests that they probably do what they are intended to do...correct small spelling and transposition errors, allow for variation in the way a given (b) (7)(E) is reported, allow for slight variation in the (b) (7)(E), and collectively allow proper verifications to be made more frequently. It seems fair to observe that anytime tolerances are applied, the resulting SSN verification product becomes somewhat suspect. Outside organizations are making decisions based on our statement that a “match” has been made. It is possible that their decision, based on an answer we gave influenced by the application of tolerances, could be wrong. Even though we provide users with handbooks which explain in detail how the tolerances are applied, they may not read those handbooks and may operate under the supposition that what we are providing is “exact.” SSA may wish to consider the use of tolerances as an Agency policy or, alternatively, give organizations the choice of a tolerance free “exact match” if there is a market for such a match. This might help avoid legal or political liability issues if decisions based on “tolerances” create a problem of notoriety. On the other hand, no one seems to be complaining that tolerances have caused any problems and, if we stop their use, more no-matches will certainly be the result. That result carries its own set of potential notoriety problems.

Of interest to the group was the finding that (b) (7)(E), while requested as part of the information input for all routines, may be ignored in the SSN verification process. First, it is optional to provide (b) (7)(E) so if it is not input, it is ignored and second, if the input includes alpha characters, the routines ignore it entirely. We believe that (b) (7)(E) should play an important role in determining if an SSN verifies. Use of (b) (7)(E) with the established tolerance of “(b) (7)(E)” would strengthen the quality of our SSN verification product. As a secondary benefit, this would help to eliminate parents using their children’s SSNs for improper work or for other inappropriate purposes.

We believe it is advisable for SSA to consider making it mandatory to include the (b) (7)(E) in SSN verification requests and that the SSN verification process make (b) (7)(E) integral to SSN verification. We believe the use of (b) (7)(E) should be

optional for employers because (b) (7)(E)

- *With regard to certain other information in addition to SSN verification*

Several routines were created to provide information in addition to the SSN verification information normally provided. Some routines also provide:

- (b) (7)(E)
- (b) (7)(E)
- (b) (7)(E)

The effect of returning special information to a user often requires creating a new routine or appending special code to an existing routine. Both of these situations require effort from our Systems components and further expand our universe of active routines. As we noted above, this also exacerbates problems of control over “who is getting what” and may pose the question of “does the access remain appropriate” at some point in the future.

(b) (5)

### Access Methodology

The EVS system was implemented in 1983 providing access which was appropriate to the user, from paper listings to what was then state-of-the-art technology. The access methodologies used then are still available and are still being used. Since then SSA has provided additional ways to access SSN verification routines as technology has evolved. The media used to request SSN verifications is also the media SSA uses to return the verifications to the user. The media chosen by the user effects the turnaround time of our response.

Before becoming a user of SSA verification processes, the entity must be authorized access to specific information. This process varies depending on the type of user and the information to be accessed. In many cases a Memorandum of Agreement is processed and the user must provide not only information about their need for the verification service, but about the media or systems access they expect to use. Often they must



provide test media to ensure that their systems are compatible with SSA verification systems. If the user is other than an employer, decisions must be made about the disclosure of information. If the data is needed for something other than a program related purpose, there is a charge for the information and we must negotiate a reimbursable agreement.

Mailed media submissions. There are three basic types of mailed media which OCO processes. They must be controlled upon receipt, processed, tracked, and responses returned on the same media as the submission. Turn around time for mailed media is 1 to 2 weeks normally but may take as long as 30 days in peak workload periods. We process the following types of mailed media:

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(b) (7)(E)

Software application submissions. The agency also works with a variety of software applications to receive and provide responses for verification requests. This sometimes requires access to specific software by both users and SSA and provides a turnaround time of 24-48 hours. Some examples of software application for number verifications:

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(b) (7)(E)

Online Access. We are now providing online, real-time access in some situations. SSA is piloting several approaches to Internet access by the user, most notably the SSN Verification System which has been developed for employers. This system will provide a variety of experience as well as lessons learned as we move forward providing online access. Some examples of online access include:

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(b) (7)(E)

SSA must resolve a variety of electronic authentication issues to ensure that we do not disclose SSN information inappropriately. SSA is participating in E-government initiatives to develop authentication as we are developing online access to verification. The authentication efforts must be fully developed before online access may be extensively utilized.

Telephone and face-to-face. SSA provides SSN verifications over the telephone to employers who provide their Employer Identification Number (EIN) and the data to



verify the number. We currently have three different groups providing telephone verification: (1) the Teleservice Center 800#; (2) Office of Central Operation, Division of Employer Services; and (3) Field Offices, which in addition to telephone verification, may discuss verification face-to-face, especially when no-match or edit situations have occurred.

- *With regard to consistency of responses...*

*Different Media.* Since the processes for media were developed at different times and technological constraints were different, the responses vary depending on the media used in the request/response. For example, for a response that must be returned with the media submitted, such as a tape cartridge, keeping the length of the response short is imperative. For other media, such as responses returned on dedicated lines or over the Internet, the programmers were able to focus on the information needed rather than the size of the message. This has resulted in different information being provided on responses based solely on the media of the submission. A new method needs to be developed to give the user consistent information which probably will require the elimination of use of some of the out-of-date technology.

*Telephone and face-to-face.* Because of the difficulty of ensuring over the telephone that the requestor has the right to the information, instructions for telephone verification are strict. However, there are minor differences in the instructions for the TSC and the Division of Employer Services representatives which occasionally result in inconsistencies. There are further complications since the agency representatives do not use the same software application used by the electronic systems. Current telephone verifications only provide a match or no-match response. To ensure a greater measure of consistency all SSA users should have access to the same electronic systems. However, this should not prevent field office users from accessing other systems to resolve a no-match concern which is brought to the attention of the field office. When no-matches are the result of an SSA inconsistency, such as using a nickname, Beth for Elizabeth, a Replacement Card SS-5 should be processed to make changes to the Numident to prevent future repeated verification no-matches.

## **Registration and Controls**

SSA's current control process gathers limited information about individuals and organizations approved for access to certain SSN verification routines. Maintaining the information and keeping it current is labor intensive and, while this process was sufficient at the point in time when our services were limited, it no longer serves the needs of SSA. Our current process provides a listing of registered users and the routine they were last assigned. The process does not provide for updates of information or insuring that the business user is the same as that originally registered with SSA. No provision is made to control access of employees within an organization. No staff is assigned to maintain the registration process. SSA needs more complete and updated information if it is to conduct business effectively and safely. We recommend the creation of an electronic

registration and control system to allow SSA to effectively monitor and control access and utilization of this increasingly demanding part of our work.

The following discussion articulates elements we believe should be considered for inclusion in such a system. Our recommendation provides a basic framework which we request be adhered to in spirit. Our analysis was not sufficiently detailed to allow an in-depth consideration of many of the details which will be required of such a system.

We recommend that the system:

- Record each registration applicant with detailed information about both the user organization and individuals.

A complete record of information about the business or governmental entity should be maintained, including such things as their organizational names and the names and positions of employees given access, as well as address and telephone number so that we may contact the user at specific intervals to update this information. Information about access denials and the authority for the denial should also be maintained.

- Record what information the user is entitled to receive and the authority allowing it.

Document decisions to allow individuals and organizations access to certain information based on the body of law, regulation, policy, General Counsel opinions, and Commissioner's decisions previously discussed. Generally, specific but brief remarks regarding the access authority decision ought to be recorded for future reference. If a specific law, regulation, opinion, or policy requires or allows the access, it should be documented. If a Commissioner's Decision or General Counsel opinion is the basis of authority, document it and append an electronic copy of the decision or opinion to the record. This documentation assures anyone going to the record can determine why particular access was allowed.

We also suggest that permitted access authorities be reviewed from time-to-time, to make certain that the permitted access continues to be appropriate. If the authority is properly recorded, the review is made much easier. In addition, as people leave the Agency, their collective knowledge of the justification for the access will be preserved and passed on.

- Use this system to provide management information.

All interested components should be consulted regarding management information needed to conduct business related to the registration, control, and integrity review process.

We suggest the following:

1. Record when a party's access began and, if appropriate, when it ended.

2. Record frequency of use of access particularly when usage is dormant for a long period ((b) (7)(E) .)

After a prolonged period of non-use, we believe it would be wise to reestablish our relationship to the potential user in terms of what the information would be used for and what authority would be granted. This action should assist in maintaining the integrity of our SSN verification program. If the party returns and requests information later, he will be required to re-register for services.

When this control process is operational, in such prolonged non-use situations, an electronic flag should be generated and access should be revoked automatically by the system.

- Systems security should be involved in the design of information collected, how it is monitored, and what actions might be pursued if problems are detected.

Part of our responsibility to our customers is to take steps to ensure the information we provide to users is not misused. Information supplied through SSN verification might be used in identity theft schemes which could do great damage to the people affected. Fraud appears to be increasing and the public is aware of this and the part the SSN plays in such schemes. Our systems security component should be a full partner in the development of the registration and control process and in determining how the information is monitored and interpreted.

System security professionals are aware of methods of detecting unusual patterns of usage which might indicate questionable activities. Data mining is a technical tool becoming more and more useful and our System Security people have the Agency expertise in these skills. Other system monitoring skills may be employed at their direction.

- Access to this system should be provided to any component which can justify a need for the information.

In addition to Systems and Systems Security, the Office of Public Disclosure needs to have access to the system to post certain information and to review user access allowed from time-to-time. Operations may need access to assist in registration efforts and to assist users when problems arise. DCFAM may need access for billing purposes. This list will grow as needs are identified by the components.

- Use advanced technology as much as possible.

Make as much of this registration process as possible available on the Internet using portal or similar technology. If practical, make the user responsible for an appropriate portion of the registration process.

## **Recommendations**

After completing a review of disclosure policy (tab A) and the intricacies of individual process codes (tab B), the group identified areas which needed to be changed, improved or eliminated. While EVS and supporting verification routines continue to meet SSA's basic enumeration verification needs both from a policy and processing standpoint, the overall process is labor intensive, badly fragmented, and needs to be updated to function within the current electronic environment.

The sub-team identified a plethora of minor changes that need to be made to a large number of routines and attempted to categorize and prioritize them. As part of our discussion we were made aware that what appeared to be comparatively simple changes intended to be applied to all of the routines are, in fact, quite complex to implement given the multiple routines and our current systems lifecycle processes. We learned that when such across-the-board changes are made they must often be applied individually to each routine requiring a large, lengthy, and often duplicative resource investment. For example, to add death information to the [REDACTED] EVS routines which do not have it, would require very complex development.

While the group felt the addition of death to each functioning process code was a basic recommendation, we felt that the resource commitment was too large, given it would be only a limited improvement. Making these specific changes would still not solve many of the inconsistencies both of SSN verification processing and responses. Therefore, the sub-team recommends that SSA take a few, cost-effective actions quickly but spend the majority of our effort developing a new comprehensive SSN verification system to support all of the SSN verification processes.

We are therefore dividing our recommendations into segments:

Interim, high-impact/low cost actions;  
Major Recommendations; and  
Collateral Recommendations.

### **A. Interim, high-impact/low cost actions:**

1. Eliminate (and stop spending resources supporting) the [REDACTED] routines which are not being used by any customers currently. These are process [REDACTED] (b) (7)(E) [REDACTED] (b) (7)(E) [REDACTED]
2. Apply Single Select to all employer verifications including online SSNVS. This will provide consistent and accurate responses to all employers.
3. Complete a cleanup of current registrants, including denying access to those who have not used the process for [REDACTED] (b) (7)(E) [REDACTED]
4. Update registration information for current users as the opportunity presents itself.

We recommend that while the new system is being built, we make as few changes or updates as possible to current systems so that resources can be dedicated to getting the new system up quickly.

## B. Major Recommendations

### 1. Develop a Robust Verification System for all Customers

We recommend that SSA develop a new SSN verification system capable of providing consistent processing and responses that also allows appropriate variations required by disclosure policy. While the specific requirements will need to be determined, the system should require/provide:

- Consistent data input from all users, including (b) (7)(E) as a match criteria.
- Consistent format of all responses which the user can easily understand. The responses would vary only in the number of descriptions available depending on the amount of information that is disclosable.
- Eventual availability of access on the Internet using portal or similar technology.
- Provide death information that SSA may disclose (currently unrestricted verified and non-verified data);
- Create a small number of modules that would be the basis for all SSN verifications, and allow for some flexibility to add additional routines such as single select and perhaps to provide a limited “Yes/No” reply.

Categories of users could include:

- *Employers*

- (b) (7)(E)
- (b) (7)(E)

- *Governmental Users—* (b) (7)(E)

- (b) (7)(E)
- (b) (7)(E)

- *Third Party Consent—* (b) (7)(E)

(b) (7)(E)

- (b) (7)(E)
- (b) (7)(E)

- *Exact Match Module—*Provides no tolerances.

- (b) (7)(E)
- (b) (7)(E)
- (b) (7)(E)

(b) (7)(E)

- Use consistent (b) (7)(E) tolerances for all but the Exact Match module. (b) (7)(E) for employer verifications.)
- Explore the development of functionality that would reduce the number of non-verifications that occur due to name problems that the current verification systems cannot identify.
- Provide SSA's public service staff access to the same routines to be used in providing verification to users who come to the FO for SSN verification. This will help develop consistency for all of SSA's verification services.

Unless statutorily required, SSN verification should not:

- Provide information about data collected, but not maintained or updated by SSA, such as citizenship/alien status involving student status or authorization to work.

## **2. Develop an Automated Verification Registration and Control Process**

SSA's processes for registering and maintaining information about our verification users have not kept pace with increased demand or changing technology. We also have an increased need for a variety of management and control information about both the users and uses made of our information. We also need to identify potential misuse. With the exception of the SSNVS process, these needs are not well supported by our current process.

We recommend that SSA, under the leadership of the Office of Systems, develop a system with supporting processes for registration, maintenance and control of users and uses of information, as well as management information and integrity review functions. Input should be provided by all involved, including DCFAM, DCO and DCDISP.

- Provide for registration control both for the institutional customer and for the employees who are authorized to access the system. This should be updated periodically.
- Provide for the registration decision process to be shared by Systems and Disclosure Policy. Each registration would include data reflecting the authority for the disclosure and the level of access granted.
- Provide for access to and use of the various components by all those working with the verification process as needed, including the primary users and DCO staff.
- Include information about customer's start and stop dates to track access to the system.
- Identify and build a system to address business integrity issues, including such areas as:
  - Verification/authentication that applicants are who they say they are and have a legitimate need for the verification information;

- Re-authentication and updates of registration applications;
- Monitoring for over-utilization;
- Use of techniques such as data mining to identify potential abuse.
- Provide for the automatic suspension of users who do not use the system for (b) (7)(E)
- Provide a small staff to maintain and monitor the registration, control and integrity system and processes.
- Eventually provide access to the registration process on the Internet using portal or similar technology.

## C. Collateral Recommendations

1. We recommend that SSA proactively maintain the NUMIDENT record, updating it to reflect the correct legal name, date of birth, and other changes as mismatches are discovered and documented. Perfection of the NUMIDENT record will avoid future verification problems. In addition, use of NUMI-Lite as an expedient perpetuates “non-verification” problems when the underlying NUMIDENT record is not corrected or modified to use the legal name.
  - Develop POMS instructions that focus on verification processes and updating the NUMIDENT. Provide instructions for public contact staff that point out the differences in various verification processes to be used in explaining verification discrepancies to the public.
  - Develop an Operations verification methodology that provides field office visitors a verification document that is consistent with electronic verifications and meaningful to employers and others that have received a no-match through the electronic process.
2. We recommend that SSA provide re-education of the general public regarding personal information and its accuracy and timeliness filed with SSA as well as with employers regarding the SSN verification services that we provide. Particular attention should be paid to the concept that SSN verification does not represent identification of an individual.
  - Provide a verification section on the SSA Internet page, “Information and Resources for Employers.” This should include basic information about disclosure policy, access methodology, and that some tolerances are applied in different verification processes. It should also explain why mismatches occur.
  - Include verification information in the Frequently Asked questions, e.g. What happens when my employer/MVA verifies my SSN? What do I do if I receive information that my SSN did not match SSA’s records? What would cause an SSN not to match?
  - Request that OCOMM consider how best to get the message across to the public and that verification topics be included in PI/PR packages for staff such as Public Affairs Specialists.



**DISCUSSION OF POLICY CONCERNING DISCLOSURES OF SOCIAL SECURITY  
NUMBER INFORMATION  
BY THE  
SOCIAL SECURITY ADMINISTRATION**

**I. BACKGROUND**

The SSN is one of the most sensitive pieces of information in SSA's records. It is the key to identifying and retrieving most of the highly personal information SSA maintains about the majority of the U.S. citizenry, including information about:

- Persons who have applied for and/or received an SSN (such persons must provide personal information such as name, date and place of birth, parents' names, gender information, and citizenship status);
- Employees and self-employed individuals whose work activity is subject to FICA and SECA taxes and reported to SSA; and
- Claimants/applicants for benefits under programs administered by SSA (e.g., disability benefits under the title II disability programs in which individuals must provide SSA with sensitive medical records in order to determine their entitlement to such benefits).

Over the decades, the SSN has become the identifier of choice by all levels of government and the private and commercial sectors. Many of the entities that use the SSN request SSA to verify that SSNs and identifying information in their records match or do not match information in SSA records. Because of the widespread use of the SSN, it is crucial that SSA be cautious when deciding whether to release SSNs or verify SSNs for third parties when there is no Federal statutory authority mandating disclosure.

Since the terrorists' attacks of September 11, 2001, the SSN has received heightened attention, particularly with respect to homeland security purposes. Since 9/11, SSA has received numerous requests for verification of the SSN for such purposes. Some examples are requests from:

- The U. S. Coast Guard, Department of Homeland Security for identification of merchant mariners;
- The Immigration and Naturalization Service (which now is a part of the Department of Homeland Security) for identification of certain individuals applying for jobs at nuclear facilities;
- Eglin Air Force Base for verification of SSNs of visitors to the base;
- The Department of Defense for SSN verification and citizenship data of certain military personnel;
- Financial institutions under provisions of the Patriot Act for verification of identity of their customers. (The Department of the Treasury has responsibility for implementing the Patriot Act.); and



- The Department of State for SSN verification of passport applicants.

## II. SSN DISCLOSURE POLICY<sup>1</sup>

### A. POLICY—GENERAL

#### 1. Definitions

- ‘Disclosure’ entails release and/or verification/validation of SSNs.
- ‘SSN release’ means providing a third party with the SSN.
- ‘SSN verification/validation’<sup>2</sup> means comparing a name and SSN and other information such as date of birth and gender with information in SSA records and informing the requester of the results of the match. This response could range from a minimum of a ‘match/no match’ response to identifying the specific data elements that match or do not match information in SSA records. We generally try to release only the minimum information to serve the purposes of a request.

#### 2. Statutory Authorities Governing Release of Personal Information in SSA Records

SSA’s disclosure policy is based on Regulation No. 1, 20 CFR Part 401. This regulation implements section 1106(a) of the Social Security Act (42 U.S.C. 1306(a)); the Privacy Act of 1974 (5 U.S.C. 552a); and other disclosure or confidentiality statutes such as the Freedom of Information Act (5 U.S.C. 552 and section 6103 of the Internal Revenue Code (26 U.S.C. 6103)). Below is a brief overview of these statutory and regulatory authorities. The release or verification of SSNs is subject to these authorities the same as is other personal information in SSA’s possession.

##### a. Section 1106(a) of the Social Security Act (Act) (42 U.S.C. 1306(a))

Section 1106(a) of the Social Security Act authorizes SSA to disclose information from program records only as prescribed in regulations by the head of the agency. This applies generally to **all** information obtained in the administration of the Social Security Act, regardless of whether the information is personal, and regardless of how the information is obtained. The applicable regulations that have been promulgated are Regulation No. 1, 20 CFR Part 401, and Regulation No. 2, 20 CFR Part 402.<sup>3</sup>

##### b. Privacy Act (5 U.S.C. 552a)

<sup>1</sup> The term “disclosure” encompasses both the release of the SSN and SSN verification.

<sup>2</sup> Although the terms “verification” and “validation” often are used interchangeably there is a distinction to be made concerning these terms. Verification of SSNs has been defined as providing a requester with a ‘match’ or ‘no match’ response; it does not include giving a reason for the ‘no match’ response. On the other hand, validation of SSNs has been defined as providing a requester with a ‘match’/‘no match’ response and the reason for the no match. Usually, whenever disclosure policy allows verification of SSNs without consent, the policy also allows validation of SSNs. For purposes of this paper, we refer to “verification.”

<sup>3</sup> Regulations 20 CFR Part 402 implements the FOIA. These regulations generally do not impact the release or verification of SSN via EVS.

The Privacy Act governs SSA's collection and maintenance of information in 'systems of records.'<sup>4</sup> The Privacy Act does not permit SSA to disclose information about a living person without the written consent or request of the individual to whom the information pertains unless one of 12 exceptions in that law 'permits' disclosure.<sup>5</sup> Eleven of these exceptions allow discretionary disclosures. The remaining exception requires disclosure if information is required to be disclosed under the FOIA.

The Privacy Act exception most commonly used by SSA to disclose personal information is the 'routine use' exception (5 U.S.C. 552a(b)(3)).<sup>6</sup> The majority of SSN verifications SSA provides to third parties without individuals' consent are made under the routine use exception.

**c. Freedom of Information Act (5 U.S.C. 552)**

The FOIA affects SSA's policies on what administrative and instructional material must be released for the information of the public.<sup>7</sup> It may also require the release of personal information if one or more of the FOIA exemptions do not allow SSA to withhold the records. The FOIA as amended by EFOIA amendments of 1996, among other things, gives the public access to government information and records maintained in an electronic format, provides for expedited processing of certain requests, and establishes "electronic reading rooms," and requires an agency reference guide on FOIA to be made available.

**3. Regulatory Authority Governing Release of Personal Information in SSA Records  
SSA's Disclosure Regulations No. 1 (20 CFR Part 401)**

Regulation No. 1 implements the requirements of the Privacy Act of 1974, 5 U.S.C. 552a, and section 1106(a) of the Social Security Act concerning disclosure of information about individuals, both with and without their consent. This regulation also sets out the general guidelines which SSA follows in deciding whether to make disclosures.

**B. POLICY—RELEASE OF SSNs**

**1. Mandated Release of SSNs**

There are a number of Federal laws that require SSA to release SSNs. In such cases, it is SSA policy to comply with these statutory mandates. Examples of such laws are:

- 5 U.S.C. 552 (FOIA)—Requires release of SSNs (and other information) about deceased persons.<sup>8</sup>

<sup>4</sup> As defined in the Privacy Act, a "system of records" is any group of records under the control of a Federal agency from which information is retrieved by use of an individual's name or other personal identifier, such as a Social Security number. (5 U.S.C. § 552a(a)(5)).

<sup>5</sup> One of the 12 exceptions in the Privacy Act requires disclosure of information if the disclosure is required under the FOIA. The remaining 11 exceptions allows SSA to make 'discretionary' disclosure.

<sup>6</sup> The routine use exception allows disclosure of personal information to third parties for purposes that are compatible with the purpose for which SSA collected the information.

<sup>7</sup> The FOIA generally does not impact the release or verification of SSNs via EVS.

<sup>8</sup> SSA created the Death Master File (DMF) as a result of a settlement agreement of a 1978 lawsuit brought by Mr. Ronald Perholtz. The DMF contains deceased persons names, SSNs, dates of birth, and, if available, parents' names and the zip code where benefit checks were being received prior to death. Under FOIA, SSA must provide the DMF to any requester.

- 5 U.S.C. 8347(m)(3)—Requires release of SSNs to the Office of Personnel Management for administering its pension program for retired Federal Civil Service employees.
- 8 U.S.C. 1360—Requires release of SSNs of aliens to the Department of Homeland Security [the former Immigration and Naturalization Service] for purposes of identifying and locating aliens in the U.S.
- 42 U.S.C. 1382(e)(5)—Requires release of SSNs, names and addresses of supplemental security income recipients who are fleeing felons or who are violating a condition of probation or parole imposed under Federal or State law to any Federal, State, or local law enforcement officer.
- 50 U.S.C. App. 462—Requires release of SSNs to the Selective Service System for selective service registration.

## 2. Discretionary Release of SSNs

SSA has discretionary authority under the Privacy Act and Regulation No. 1 to release SSNs to third parties, even though there may not be a specific Federal statute mandating the release. Because of the sensitivity of the SSN, under current policy, SSA limits this discretionary authority to a few circumstances. These are:

- Release of the SSN is necessary to administer the Social Security Act. For example, SSA will release the SSN for program administration under instances including, but not limited to:
  - Employers for purposes of reporting wages for FICA tax purposes<sup>9</sup>;
  - The Department of Justice to investigate and prosecute violations of the Social Security Act; and
  - The Department of the Treasury, Secret Service, to investigate theft of Social Security checks.
- Release of the SSN is to a Federal, State, or local government agency that has *Federal statutory* authority to collect and use the SSN when determining eligibility/entitlement to benefits/services under income-maintenance or health-maintenance programs administered by those agencies.<sup>10</sup> Examples of such programs include, but may not be limited to, the following:

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<sup>9</sup> The policy allowing release of SSNs to employers is currently under review as a result of a recent decision by the Commissioner affecting release and verification of SSNs for employers.

<sup>10</sup> The POMS at GN 03301.000B defines income-maintenance and health-maintenance programs as follows:

Income maintenance program – any noncommercial program designed to provide an individual with the basic necessities of life or to enable him to purchase such necessities.

Health maintenance program – any noncommercial program designed to provide an individual with the basic health care or to enable him to purchase such care.

- Programs listed in Section 1137(b) of the Act (42 U.S.C. 1320a-7(b)) (e.g., temporary assistance for needy families, Medicaid, and Food Stamps). This provision of law requires States to collect the SSN of applicants for these programs.
- Release of the SSN to a State bureau of vital statistics agency involved in the enumeration at birth program and requests feedback of SSNs assigned via this process for health-maintenance or health research purposes (e.g., to establish immunization registries).
- Release of the SSN to an organization or agency such as a prison system that is required by Federal law to furnish SSA with SSN information.
- Release of the SSN to the Internal Revenue Service for tax administration purposes.
- Release of the SSN may be made on a case-by-case basis in certain cases in which both Regulation No. 1 and the Privacy Act allow the release. For example, both the regulation and the Privacy Act allow SSA to make discretionary disclosure of SSNs and other information to:
  - the Bureau of the Census for Title 13 census activities. SSA used its discretionary authority to provide the Census Bureau with a copy of SSA's SSN database to test an administratively based survey for the year 2000 census;
  - the Comptroller General (General Accounting Office) for auditing Social Security and other government programs; and
  - Congressional committees or subcommittees for official committee/subcommittee activities.

## C. POLICY—VERIFICATION OF SSNs

### 1. Statutory Mandate

#### **Federal Statute**

It is SSA policy to verify SSNs for third parties when *mandated* to do so by Federal law. Examples of statutorily mandated SSN verifications are:

- 20 U.S.C. 1091, the Higher Education Act of 1965, as amended, requires SSA to verify SSNs of student loan applicants for the Department of Education.
- Section 453(j)(1)(B) of the Act (42 U.S.C. 653(j)(1)(B)) requires SSA to verify the accuracy of, correct, or supply to the extent possible and report to the Secretary [of HHS] the name, SSN, and birth date of individuals included in the National Directory of New Hires.

### 2. Discretionary SSN Verification

It is SSA policy to make discretionary decisions to verify SSNs for program-related and nonprogram-related purposes when both Regulation No. 1 and the Privacy Act allow the verifications. Usually, SSN verifications are made under the routine use exception of the Privacy Act (5 U.S.C. 552a(b)(3)).

**a. Program-Related SSN Verifications**

It is SSA policy to verify SSNs as necessary to administer its responsibilities under the Social Security Act.

**b. Nonprogram-Related SSN Verifications**

It is SSA policy to verify SSNs without the written consent of the numberholder for nonprogram-related purposes under the following circumstances:

- To other government agencies that administer income-maintenance or health-maintenance programs that are compatible with SSA programs, even though there may be no Federal statutory mandate to do so. Such programs include, but are not limited to:
  - Energy assistance programs administered by the States;
  - Department of Housing and Urban Development subsidized housing programs; and
  - State tax rebate programs where eligibility is based on low income, advance age (usually 65 or older), and/or disability.
- When requested by State motor vehicle agencies for issuing driver's licenses or State-issued identification cards.
- When requested by Federal agencies that use the SSN as a numerical identifier in their recordkeeping systems.

**D. SSN VERIFICATION/RELEASE WITH WRITTEN CONSENT**

Under the Privacy Act, SSA must verify or release SSNs to third parties that have obtained the written authorization of the numberholder, regardless of the purpose of the request. The written authorization must meet SSA regulatory requirements for written consent (20 CFR Part 401.100).

**III. SUMMARY CHART OF SSN DISCLOSURE POLICY**

See attached.

Prepared by: Willie J. Polk and Lillian Liu

## SSN DISCLOSURE POLICY—A SUMMARY CHART

(For SSN Verification Sub-Team of the Enumeration Response Team (ERT))

Item #	Requester	Purposes and Conditions of SSN Disclosures <sup>11</sup>	Authorities	Types of Disclosure Mandatory/ Discretionary
(1)	(2)	(3)	(4)	(5)
<b>I. PRIVACY ACT (PA) DISCLOSURES OF PERSONAL INFORMATION IN PROGRAM RECORDS WITH WRITTEN CONSENT</b>				
Under the Privacy Act (5 U.S.C. 552a(b)) and SSA's disclosure regulations (20 CFR 401.100), SSA must disclose (i.e. release) SSNs to third parties who have obtained the written authorization of the number holder (NH), regardless of the purpose of the request.				
<b>II. STATUTORY/REGULATORY DISCLOSURES OF PERSONAL INFORMATION IN PROGRAM RECORDS WITHOUT CONSENT</b>				
II.A.—PA Disclosures: “12 Exceptions.” II.B.—Disclosures under Sec. 1106(a) of the Social Security Act (the Act) (42 U.S.C. §1306(a)). II.C.—Social Security Regulations: 20 CFR Part 401.115-200; and Part 402.70-110.				
<b>II. A.—PA DISCLOSURES: “12 EXCEPTIONS”*</b>				
*Conditions of disclosure under the PA (5 U.S.C. §552a(b)): “No agency shall disclose any record which is contained in a system of records by any means of communication to any person, or to another agency, except pursuant to a written request by, or with the prior written consent of, the individual to whom the record pertains, unless disclosure of the record would be” one of the 12 Exceptions listed. In some cases SSA is the initiator of the a disclosure; in others disclosure may be made at the request of a third party.				
Items arranged in ascending order of PA provisions.				
II.A.1	To those officers and employees of the agency which maintains the record who have a need for the record in the performance of their duties. <sup>12</sup>	[SSA internal use—In need of the SSNs in the performance of their duties.]	5 U.S.C. §552a(b)(1)	Discretionary disclosure—release, validation, or verification as needed to perform official duties.
II.A.2	Public <sup>13</sup> , Any Member of the.	As required by Freedom of Information Act (FOIA).	5 U.S.C. §552a(b)(2)	Mandatory disclosure— release, validation, or verification allowed. <sup>14</sup>

<sup>11</sup> In the context of this summary of SSA's disclosure policy, the term “disclosure” encompasses both the release of specific records as well as verification of information based on the contents of SSA records. For this reason, when discussing situations in which SSA policy allow SSNs to be given to a third party the term “release” is used. When discussing situations in which SSA matches information such as name, SSN and date of birth with information in SSA records and discloses only the results of the match, the terms “verification” or “validation” are used.

<sup>12</sup> SSA internal use: Release of information to SSA's Office of the Inspector General is also considered as “Disclosures required by law,” see 20 CFR 401.120.

<sup>13</sup> “The public does not include Federal agencies, courts, or the Congress, but does include State agencies, individuals, corporations, and most other parties.” 20 CFR 401.130. See also II.C.2 below.

<sup>14</sup> Notwithstanding Exemptions under 20 CFR 402.70-110 that stipulate conditions for withholding records.

Item #	Requester	Purposes and Conditions of SSN Disclosures <sup>11</sup>	Authorities	Types of Disclosure Mandatory/ Discretionary
(1)	(2)	(3)	(4)	(5)
II.A.3	Any Third Party.	For a routine use—when use of such record is for a purpose “compatible with the purpose for which (the record) was collected.”	5 U.S.C. §552a(b)(3) <sup>15</sup>	Discretionary disclosure— release, validation, or verification allowed.
II.A.4	Bureau of the Census.	For purposes of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13 U.S.C.	5 U.S.C. §552a(b)(4) <sup>16</sup>	Discretionary disclosure— release, validation, or verification allowed.
II.A.5	Any third party. Advance written request required.	For the sole purpose of a statistical research or reporting record; <i>Provided</i> , that, the record is transferred in a form that does not identify the subject individual.	5 U.S.C. §552a(b)(5)	Discretionary disclosure—But: No identifying data; No disclosure of personal info.
II.A.6	National Archives and Records Administration (NARA) or Administrator of the General Services.	As a record that has sufficient historical or other value to warrant its continued preservation by the U.S. Government, or for evaluation by the Administrator of General Services or his designee to determine whether the record has such value.	5 U.S.C. §552a(b)(6) <sup>17</sup>	Discretionary disclosure— release, validation, or verification allowed.
II.A.7	A government agency or an instrumentality of any governmental jurisdiction within or under the control of the U. S. Government. Written request specifying the part of the record desired and the law enforcement activity for which it is sought.	For civil or criminal law enforcement activity if the activity is authorized by law, and if the head of such gov’t agency or instrumentality has made a written request.	5 U.S.C. §552a(b)(7) <sup>18</sup>	Discretionary disclosure— release, validation, or verification allowed.
II.A.8	Any Individual. <sup>19</sup>	In case of “compelling circumstances affecting the health or safety of any individual if a notice of the disclosure is transmitted to the last known address of the subject individual.”	5 U.S.C. §552a(b)(8) <sup>20</sup>	Discretionary disclosure— release, validation, or verification allowed.
II.A.9	Either House of Congress or any Congressional committee(s) Any congressional committee or subcommittee, joint committee or subcommittee of any such joint committee.	Not specified.	5 U.S.C. §552a(b)(9) <sup>21</sup>	Discretionary disclosure— release, validation, or verification allowed.

<sup>15</sup> For SSN disclosures under the “Routine Use Exception” (excluding those for purposes of Federal Statutes) see III.C. Examples of Disclosures via Routine Uses of the System of Records *Master Files of Social Security Number (SSN) and SSN Applications* (System of Records (SOR) # 60-0058).

<sup>16</sup> For examples of disclosures under this Exception, see II.C. 10 below.

<sup>17</sup> For examples of disclosures under this Exception, see II.C.12 and III.A.2 below.

<sup>18</sup> For examples of disclosures under this Exception, see II.C.4 and III.D.1 below.

<sup>19</sup> “... When used in connection with the rules governing program information, *individual* means a living natural person; this does not include corporations, partnerships, and unincorporated business or professional groups of two or more persons.” 20 CFR 401.25.

<sup>20</sup> For examples of disclosures under this Exception, see II.C.5 and III.D.2 below.

<sup>21</sup> For examples of disclosures under this Exception, see II.C.7 and III.C.1 below.



Item #	Requester	Purposes and Conditions of SSN Disclosures <sup>11</sup>	Authorities	Types of Disclosure Mandatory/ Discretionary
(1)	(2)	(3)	(4)	(5)
II.A.10	General Accounting Office (Comptroller General) and any of his authorized representatives.	In the course of the performance of the duties of the Comptroller General.	5 U.S.C. §552a(b)(10) <sup>22</sup>	Discretionary disclosure— release, validation, or verification allowed.
II.A.11	A court of competent jurisdiction.	Not specified.	5 U.S.C. §552a(b)(11) <sup>23</sup>	Discretionary disclosure— release, validation, or verification allowed.
II.A.12	To a consumer reporting agency.	In accordance with section 3711(e) of Title 31. <sup>24</sup>	5 U.S.C. §552a(b)(12)	Discretionary disclosure— release.
<b>II. B.—DISCLOSURES UNDER SECTION 1106(a) OF THE SOCIAL SECURITY ACT (THE ACT) (42 U.S.C. 1306(a))*</b>  *“No disclosure...shall be made except as the (Commissioner of Social Security) may by regulations prescribe or otherwise provided by Federal Law (emphasis added).”				
II.B.1	Any Third Party.	Vary according to provisions in SSA Regulations (20 CFR Parts 401 and 402), and those under the Act and other Federal statutes.	Sec. 1106(a) Of the Act (42 U.S.C. 1306(a)).	Disclose—release, validation, or verification allowed.
<b>II. C.— SOCIAL SECURITY REGULATIONS ON DISCLOSURES: 20 CFR PART 401.115-200; 20 CFR PART 402.70-110.</b>  “When the FOIA does not apply, we may not disclose any personal information unless both the Privacy Act and sec. 1106 of the Act permit the disclosure. Sec. 1106 of the Act requires that disclosures which may be made must be set out in statute or regulations; therefore, any disclosure permitted by this (regulation) is permitted by section 1106” of the Act. (20 CFR 401.135.)  Items arranged in ascending order of provisions under 20 CFR Part 401 (also known as Regulation No. 1).				
II.C.1	Federal, state, or local agencies, disclosures required by law.	To disclose for certain SSA program purposes, or other agencies need for their programs.	5 U.S.C. §552a(b)(3); 20 CFR 401.120.	Mandatory disclosure— release, validation, or verification allowed.
II.C.2	Public, <sup>25</sup> Any Member of the.	The FOIA requires us to disclose any information in our records upon request from the public, unless one of several exemptions in the FOIA applies.	5 U.S.C. 552; 5 U.S.C. §552a(b)(2); 20 CFR 401.130; 20 CFR 402.	Mandatory disclosure—release.
II.C.3	Any Third Party.	Disclose information for routine uses where necessary to carry out SSA's programs...(or) for use in other programs which have the same purposes as SSA programs...and in appropriate cases, for epidemiological and similar research.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release, validation, or verification allowed.

<sup>22</sup> For examples of disclosures under this Exception, see II.C.8 below.

<sup>23</sup> For examples of disclosures under this Exception, see II.C.9 and III.D..3 below.

<sup>24</sup> Title 31 “Money and Finance” (31U.S.C.) §3711(e): (1) When trying to collect a claim of the Government under a law except the Internal Revenue Code of 1954 ([26 U.S.C. 1](#) et seq.), the head of an executive, judicial, or legislative agency shall disclose to a consumer reporting agency information from a system of records that a person is responsible for a claim. There is no reference in the Social Security Act or the SSA Regulation 20 CFR Part 401 regarding this PA “Exception.”

<sup>25</sup> See also Note 3 and II.A.2 above.



<b>Item #</b>	<b>Requester</b>	<b>Purposes and Conditions of SSN Disclosures<sup>11</sup></b>	<b>Authorities</b>	<b>Types of Disclosure Mandatory/ Discretionary</b>
(1)	(2)	(3)	(4)	(5)
II.C.4	Law enforcement agencies.  Written request from the head of the enforcement agency giving enough information to show that conditions for disclosure are met, what information is needed, and why it is needed.	Disclose information for law enforcement purposes only in cases: <ul style="list-style-type: none"> <li>• where a violent crime such as murder or kidnapping has been committed and the individual about whom the information is being sought has been indicted or convicted of that crime;</li> <li>• when necessary to investigate or prosecute fraud or other criminal activity involving the social security program; and</li> <li>• for investigation or prosecution of criminal activity in other income-maintenance or health-maintenance programs (e.g., other governmental pension programs, unemployment compensation, general assistance, Medicare or Medicaid) if the information concerns eligibility, benefit amounts, or other matters of benefit status in a social security program and is relevant to determining the same matters in the other program.</li> </ul>	5 U.S.C. §552a(b)(7); 20 CFR 401.155.	Discretionary disclosure— release, validation, or verification allowed.
II.C.5	Individuals and appropriate health or law enforcement officials	Disclose information in compelling circumstances where an individual's health or safety is affected provided a notice is sent to the individual whose record is disclosed.	5 U.S.C. §552a(b)(8); 20 CFR 401.160.	Discretionary disclosure— release, validation, or verification allowed.
II.C.6	Any Third Party.	Disclose data for statistical and research purposes in a form allowing individual identification, pursuant to published routine use, when the purpose is compatible with the purpose for which the record was collected.	5 U.S.C. §552a(b)(3) and (5); 20 CFR 401.165.	Discretionary disclosure— Release, validation, or verification allowed.
II.C.7	Either House of Congress, any committee or subcommittee of either House, or to any joint committee of Congress or subcommittee of that committee.	Disclose if seeking information <b>on a matter within the committee's or subcommittee's jurisdiction</b>	5 U.S.C. §552a(b)(9); 20 CFR 401.35-401.60; 401.170.	Discretionary disclosure— release, validation, or verification allowed.
II.C.8	General Accounting Office	Disclose information when that agency needs the information to carry out its duties.	5 U.S.C. §552a(b)(10); 20 CFR 401.175.	Discretionary disclosure— release, validation, or verification allowed.
II.C.9	Court order or subpoena.	Disclose if— (1) another section of this (regulation) would specifically allow the release; (2) the Commissioner of SSA is a party to the proceeding; or (3) the information is necessary for due process in a criminal proceeding.  In other cases, we try to satisfy the needs of courts while preserving the confidentiality of information.	5 U.S.C. §552a(b)(11); 20 CFR 401.180.	Discretionary disclosure— release, validation, or verification allowed.
II.C.10	Bureau of the Census.	For purposes of planning or carrying out a census, survey, or related activity.	5 U.S.C. §552a(b)(4); 20 CFR 401.185.	Discretionary disclosure— release, validation, or verification allowed.
II.C.11	National Archives and Records Administration (NARA) or Administrator of the General Services.	As a record that has sufficient historical or other value to warrant its continued preservation by the U.S. Government, or for evaluation by the Administrator of General Services or his designee to determine whether the record has such value.	5 U.S.C. §552a(b)(6); 20 CFR 401.185.	Discretionary disclosure— release, validation, or verification allowed.

Item #	Requester	Purposes and Conditions of SSN Disclosures <sup>11</sup>	Authorities	Types of Disclosure Mandatory/ Discretionary (5)
(1)	(2)	(3)	(4)	(5)
II.C.12	Any Third Party.	Disclose information about a deceased person.	20 CFR 401.115 & 401.190. <sup>26</sup>	Discretionary disclosure— release, validation, or verification allowed.
II.C.13	Any Third Party.	If no other provision in this (regulation) specifically allows SSA to disclose information, the Commissioner or designee may disclose...information if not prohibited by Federal law. For example, the Commissioner or designee may disclose information necessary to respond to life threatening situations.	20 CFR 401.195. <sup>27</sup>	Discretionary disclosure— release, validation, or verification allowed.
<b>III. CURRENT SSA PROVISIONS FOR SSN DISCLOSURES</b>  III.A. Disclosures under Federal Statutes. III.B. Disclosures under the Act. III.C. SSN Disclosures under Routine Uses of the System of Records <i>Master Files of Social Security Number (SSN) and SSN Applications</i> (System of Records (SOR) 60-0058). III.D. Examples of Non-Routine Use SSN Disclosures under PA Exceptions <i>and</i> 20 CFR Part 401. III.E. Examples of <i>Ad Hoc</i> Disclosures under 20 CFR 401.195.				
<b>III. A.—DISCLOSURES UNDER FEDERAL STATUTES<sup>28</sup></b>  Items arranged in alphabetical order by requester.				
III.A.1	Education, Dept. of	SSNs that are provided by students to post-secondary educational institutions may be verified upon request by the Dept. of Education as required by Title IV of the Higher Education Act of 1965 (20 U.S.C. §1091).	20 U.S.C. §1091; 5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Mandatory disclosure—release.
III.A.2	General Services Administration (GSA) and the National Archives and Records Administration (NARA).	For the purpose of conducting records management studies with respect to their duties and responsibilities under 44 U.S.C. §2904 and §2906, as amended by 44 U.S.C. 2102. (Disclose only non-tax return information that is not restricted from disclosure by Federal law.)	44 U.S.C. §2904 and §2906, as amended by 44 U.S.C. 2102; 5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Mandatory disclosure—release.
III.A.3	Immigration and Naturalization Services (INS) <sup>29</sup> (Written request.)	Identification and location of aliens in the U.S.	(8 U.S.C. §1360(b)); 5 U.S.C. §552a (b)(3); 20 CFR 401.150	Mandatory disclosure—release.

<sup>26</sup> Federal courts have ruled that deceased persons do not have privacy rights. Usually any information about a deceased person, including the SSN is subject to disclosure to any requester.

<sup>27</sup> For examples of disclosure under this provision see III.E. below.

<sup>28</sup> When making disclosures required by Federal law SSA also must comply with the PA and the Agency's disclosure regulations. Thus, this section cites the Federal law mandating disclosure and the applicable PA and regulatory provision.

<sup>29</sup> Renamed as Bureau of Citizenship and Immigration Services (BCIS) under the Department of Homeland Security (DHS).

<b>Item #</b>	<b>Requester</b>	<b>Purposes and Conditions of SSN Disclosures<sup>11</sup></b>	<b>Authorities</b>	<b>Types of Disclosure Mandatory/ Discretionary</b>
(1)	(2)	(3)	(4)	(5)
III.A.4	Justice, Dept. of (DOJ)—Criminal Division, Office of Special Investigations.	Upon request, information on the identity and location of aliens may be disclosed for the purpose of detecting, investigating, and, when appropriate, taking legal action against suspected Nazi war criminals in the United States.	8 U.S.C. §1360(b); U.S.C. §552a(b)(3); 20 CFR 401.150.	Mandatory disclosure—release.
III.A.5	Personnel Management, Office of (OPM)	SSN information may be disclosed upon receipt of a request from that agency in accordance with 5 U.S.C. §8347(m)(3) when OPM needs the information in administering its pension program for retired Federal Civil Service employees.	5 U.S.C. §8347(m)(3); 5 U.S.C. 552a (b)(3); 20 CFR 401.150.	Mandatory disclosure— release.
III.A.6	Selective Service System	For the purpose of enforcing draft registration pursuant to the provisions of the Military Selective Service Act.	50 U.S.C. App. 462, as amended by 50 App. U.S.C. §462(e);  5 U.S.C. §552a (b)(3); 20 CFR 401.150.	Mandatory disclosure—release.
III.A.7	Veterans Administration (VA), Dept. of	For purposes of Veterans' Benefits information, upon request, for purposes of determining eligibility for or amount of VA benefits, or verifying other information with respect thereto.	38 U.S.C. §5106; 5 U.S.C. §552a (b)(3); 5 U.S.C. 552a(b)(3); 20 CFR 401.150.	Mandatory disclosure—release.
<b>III.B.—DISCLOSURES UNDER THE ACT</b>				
Items arranged in alphabetical order by requester.				
III.B.1	Federal, State or local law enforcement officer- with written request	If the recipient is identified as someone who is  “(A) fleeing to avoid prosecution, or custody or confinement after conviction, under the laws of the place from which the person flees, for a crime, or an attempt to commit a crime, which is a felony under the laws of the place from which the person flees, or which, in the case of the State of New Jersey, is a high misdemeanor under the laws of such State; or (B) violating a condition of probation or parole imposed under Federal or State law....	(42 U.S.C. §1382(e)(5)); 5 U.S.C. 552a(b)(7);  20 CFR 401.120.  “Furnish ...the current address, Social Security number, and photograph (if applicable) of any recipient of benefits under this title....”	Mandatory disclosure—release.
III.B.2	HHS, Centers for Medicare and Medicaid Services (CMS)	For administering Title XVIII and Title XIX claims.	(42 U.S.C. 904(e)(1)(B)); 5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Mandatory disclosure— release.

<b>Item #</b>	<b>Requester</b>	<b>Purposes and Conditions of SSN Disclosures<sup>11</sup></b>	<b>Authorities</b>	<b>Types of Disclosure Mandatory/ Discretionary</b>
(1)	(2)	(3)	(4)	(5)
III.B.3	HHS, Child Support Enforcement, Office of (OCSE).	For locating parents who owe child support.	(42 U.S.C. §653(j)(1)(B)); 5 U.S.C. §552a(b)(3); 20 CFR 401.120.	Mandatory disclosure— release
III.B.4	Health and Human Services, Department of (DHHS)—Refugee Resettlement, Office of.	For administering Cuban refugee assistance payments.	(42 U.S.C. 904(e)(1)(B)); 5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Mandatory disclosure— release.
III.B.5	National Institute of Occupational Safety and Health.	For epidemiological research studies required by the Occupational Safety and Health Act of 1974.	(42 U.S.C. 904(e)(1)(B)); 5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Mandatory disclosure— release.
III.B.6	Researchers.	For purposes of an epidemiological or similar research project, to disclose whether an individual is alive or deceased (from unrestricted DMF only) provided that:  SSA determines in consultation with the DHHS, that the research may reasonably be expected to contribute to a national health interest.	(42 U.S.C. §1306(d)); 5 U.S.C. §552a (b)(3); 20 CFR 401.150.	Mandatory disclosure— release.
III.B.7	Treasury, Dept. of.	Administering those sections of the Internal Revenue Code of 1986 which grants tax benefits based on support or residence of children.	(42 U.S.C. §405(C)(2)(H)); 5 U.S.C. §552a (b)(3); 20 CFR 401.150.	Mandatory disclosure— release.
<b>III.C.—EXAMPLES OF DISCLOSURES VIA ROUTINE USES OF THE SYSTEM OF RECORDS MASTER FILES OF SOCIAL SECURITY NUMBER (SSN) AND SSN APPLICATIONS (SYSTEM OF RECORDS (SOR)# 60-0058)<sup>30</sup></b> Items arranged in alphabetical order by requester.				
III.C.1	(A U.S.) Congressional Office.	In response to an inquiry from the office made at the request of the subject of a record.	5 U.S.C. §552a(b)(9); 20 CFR 401.170(b); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.2	Contractors & other Federal agencies.	For the purpose of assisting SSA in the efficient administration of its programs. We consider disclosing information under this routine use only in situations in which SSA may enter into a contractual or similar agreement with a third party to assist in accomplishing an agency function relating to this system of records.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.3	Employers.	To (a) report FICA taxes and State or local Social Security taxes for employees under Section 218 of the Social Security Act; and (b) correct earnings records.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.

<sup>30</sup> According to the PA (5 U.S.C. 552a(a)(5)), "...the term 'system of records' means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual." Also, the PA (5 U.S.C. 552a(a)(7)) states that "the term 'routine use' means, with respect to the disclosure of a record, the use of such record for a purpose which is compatible with the purpose for which it was collected." Some routine uses established in SOR 60-0058 comply with Federal statutes (III.A. above) or the Act (III.B. above). Section III.C. lists examples of "routine uses" that are otherwise "compatible with the purpose for which it was collected" as permitted by authorities cited.

<b>Item #</b>	<b>Requester</b>	<b>Purposes and Conditions of SSN Disclosures<sup>11</sup></b>	<b>Authorities</b>	<b>Types of Disclosure Mandatory/ Discretionary</b>
(1)	(2)	(3)	(4)	(5)
III.C.4	Energy, Dept. of.	For its epidemiological research study of the long-term effects of low-level radiation exposure.	5 U.S.C. §552a(b)(3); 20 CFR 401.150(c).	Discretionary disclosure— validation/ verification.
III.C.5	Federal agencies which use the SSN as a numerical identifier in their record-keeping systems.	For validating SSN's.	Executive Order 9397 <sup>31</sup> ; 5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— validation/ verification.
III.C.6	Federal, State or local agencies (or agents on their behalf).	For validating SSN used in administering cash or non-cash income maintenance programs or health maintenance programs (including programs under the Social Security Act.)	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— validation/ verification.
III.C.7	Federal, State and local entities where SSN use is authorized by Federal statute.	May disclose SSNs for administration of income-maintenance and health-maintenance programs (e.g., TANF, Food Stamps, Medicaid, Unemployment Compensation)	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure—release.
III.C.8	Federal, State, and local law enforcement agencies and private security contractors, as appropriate.	a) to enable them to protect the safety of SSA employees and customers, the security of the SSA workplace and the operation of SSA facilities, or b) to assist investigations or prosecutions with respect to activities that affect such safety and security or activities that disrupt the operation of SSA facilities.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.9	Interior, Dept. of the.	For administering the Act in the Trust Territory of the Pacific Islands through facilities and services of that agency.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure—release.
III.C.10	Justice, Dept. of (DOJ), a court or other tribunal, or another party before such tribunal.	When SSA, SSA employees or components, or the U.S. or any agency thereof is a party to litigation or SSA has an interest in such litigation, and SSA determines that the use of such records by DOJ, the court or other tribunal, or another party before such tribunal is relevant and necessary to the litigation, provided, however, that in each case, SSA determines that such disclosure is compatible with the purpose for which the records were collected.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— validation/ verification.
III.C.11	Justice, Dept. of (DOJ), FBI and US Attorney Offices & Dept. of the Treasury, U.S. Secret Service.	For investigating and prosecuting violations of the Social Security Act.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.12	Labor, Dept. of.	<ul style="list-style-type: none"> <li>For administering provisions of the Black Lung Benefits Act; and</li> <li>for conducting studies of the effectiveness of training programs to combat poverty.</li> </ul>	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— validation/ Verification.
III.C.13	Prison systems, Organizations or agencies such as.	Validated SSN information may be disclosed to these organizations or agencies such as prison systems that are required by law to furnish SSA with SSN information.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.

<sup>31</sup> The 1943 Executive Order 9397 (3 CFR (1943-1948 Comp.) 283-284) required that (1) all Federal components to use the SSN "exclusively" whenever the component found it advisable to set up a new identification system for individuals; and (2) the Social Security (Administration) to cooperate with Federal uses of the number by issuing and verifying numbers for other Federal agencies.

<b>Item #</b>	<b>Requester</b>	<b>Purposes and Conditions of SSN Disclosures<sup>11</sup></b>	<b>Authorities</b>	<b>Types of Disclosure Mandatory/ Discretionary</b>
(1)	(2)	(3)	(4)	(5)
III.C.14	Railroad Retirement Board.	For (a) administering provisions of the Railroad Retirement and Social Security Act relating to railroad employment; and (b) administering the Railroad Unemployment Insurance Act.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.15	Social security agency of a foreign country.	To carry out the purpose of an international Social Security agreement entered into between the United States and the other country, pursuant to section 233 of the Social Security Act.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.16	SSA-initiated Release to Recipients of Erroneous Death Master File (DMF) Information.	To correct information that resulted in erroneous inclusion of individuals in the DMF.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure—release.
III.C.17	State, Dept. of.	For administering the Social Security Act in foreign countries through facilities and services of that agency.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.18	State audit agencies.	For auditing State supplementation payments and Medicaid eligibility considerations.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.19	State bureau of vital statistics (BVS)— authorized by States to issue electronic death reports.	“Disclosures will be made to a State bureau of vital statistics (BVS) that is authorized by States to issue electronic death reports when the State BVS requests SSA to verify the SSN of an individual on whom an electronic death report will be filed after SSN verification.”	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— verification only.
III.C.20	State motor vehicle agencies (MVAs).	Validating personal identification data (i.e., name, SSN, and date of birth) concerning individuals who apply for, or are issued, drivers' licenses or other identification documents may be verified.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— validation only.
III.C.21	State vital records and statistics agencies.	Discloses SSNs of new born children for administering public health and income maintenance programs, including conducting statistical studies and evaluation projects.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.
III.C.22	Student volunteers, individuals working under a personal services contract, and other individuals performing functions for SSA but technically not having the status of agency employees, if they need access to the records in order to perform their assigned agency functions.	Under certain Federal statutes, SSA is authorized to use the service of volunteers and participants in certain educational, training, employment and community service programs. Examples of such statutes and programs include: 5 U.S.C. §3111 regarding student volunteers and 42 U.S.C. §2753 regarding the College Work-Study Program.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure—release.
III.C.23	Third-party contacts (e.g., State Bureau of vital statistics and the Immigration and Naturalization Service that issue documents to individuals).	When the party to be contacted has, or is expected to have, information which will verify documents when SSA is unable to determine if such documents are authentic.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure— release.



<b>Item #</b>	<b>Requester</b>	<b>Purposes and Conditions of SSN Disclosures<sup>11</sup></b>	<b>Authorities</b>	<b>Types of Disclosure Mandatory/ Discretionary</b>
(1)	(2)	(3)	(4)	(5)
III.C.24	Treasury, Dept. of (IRS).	For tax administration as defined in 26 U.S.C. §6103 (Internal Revenue Code (IRC)).	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure—release.
III.C.25	Treasury, Dept. of.	Investigating the alleged theft, forgery, or unlawful negotiation of Social Security checks.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure—release.
III.C.26	Veterans Administration (VA), Dept. of.	For validating SSNs of compensation recipients/pensioners in order to provide the release of accurate pension/compensation data by VA to SSA for Social Security program purposes.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure—validation only.
III.C.27	Veterans Affairs (VA), Dept. of, Philippines Regional Office.	For administering the Social Security Act in the Philippines through facilities and services of that agency.	5 U.S.C. §552a(b)(3); 20 CFR 401.150.	Discretionary disclosure—release.
III.C.28	VA or third parties under contract to VA.	For the purpose of conducting VA medical research and epidemiological studies.	5 U.S.C. §552a(b)(3); 20 CFR 401.150(c).	Discretionary disclosure—release.

**III. D.—EXAMPLES OF NON-ROUTINE USE DISCLOSURES UNDER PA EXCEPTIONS  
AND 20 CFR PART 401**

SSA also has the discretionary authority to disclose (release, validate, or verify) in situations where the Privacy Act (one of the 12 Exceptions), FOIA, and SSA Regulations (20 CFR Part 401 and 402) allow it, *and* they do not necessarily warrant the establishment of a “routine use” in the appropriate system of records. Some examples of such SSN disclosures are as follows (in order of II.A. PA “Exceptions”):

III.D.1	Law Enforcement Agency (Federal, State, or local). Written request required.	<ul style="list-style-type: none"> <li>To investigate or prosecute abuse of social security programs, including misuse of the SSN, or other income or health maintenance programs. In such cases, SSA will release information to the requesting Federal, State or local law enforcement agency; and</li> <li>for criminal law enforcement purposes when the individual in question has been indicted or convicted of a violent crime. These cases can be handled by FO's or can be referred to the RO Privacy Coordinator.</li> </ul>	5 U.S.C. §552a(b)(7); 20 CFR 401.155.	Discretionary disclosure—release.
III.D.2	Public Officials or SSA-initiated release.	In situations affecting health or safety. Under the PA, SSA may disclose non-tax return information in compelling circumstances affecting the health or safety of an individual.	5 U.S.C. §552a(b)(8); 20 CFR 401.160.	Discretionary disclosure—release.

III.D.3	Court Order and Subpoenas	If <ul style="list-style-type: none"> <li>the Commissioner is a party to the proceedings;</li> <li>disclosure is specifically permitted by Regulation No. 1 (20 CFR Part 401); or</li> <li>the information is necessary for due process in a criminal proceeding.</li> </ul>	5 U.S.C. §552a(b)(11); 20 CFR 401.180.	Discretionary disclosure—release.
<p style="text-align: center;"><b>III. E. EXAMPLES OF <i>AD HOC</i> DISCLOSURES</b></p> <p>SSA also has the discretionary authority to provide <i>ad hoc</i> disclosures (release, validate or verify) in situations where the Privacy Act (one of the 12 Exceptions) allows disclosure but SSA Regulations (20 CFR Part 401) does not specifically allow for disclosure, the Commissioner may disclose information if not prohibited by Federal law. (20 CFR 401.195). Examples of <i>ad hoc</i> SSN disclosures as follows:</p>				
III.E.1	Law Enforcement Agency (Federal, State, or local).	To respond to a threat to national security or a life-threatening situation such as an act of terrorism, kidnapping or holding of hostages.	5 U.S.C. §552a(b)(7); 20 CFR 401.195.	Discretionary disclosure—release.
III.E.2	Law Enforcement Agency (Federal, State, or local).	To identify the NH—responding to a life-threatening situation, such as kidnapping, the holding of hostages, acts of terrorism, or threats to national security.	5 U.S.C. §552a(b)(7); 20 CFR 401.195.	Discretionary disclosure—release.
III.E.3	U. S. Law Enforcement Agencies.	Release of information maintained by the SSA, for investigation related to the September 11, 2001 terrorist attacks against the United States, and subsequent requests for disclosures related to the same law enforcement activity.	5 U.S.C. §552a(b)(7); 20 CFR 401.195.	Discretionary disclosure—release.



(E)(L)(q)

(E)(L)(R)(Q)

**Disconnects Between Routines (where users get different answers) and Disconnects Between Authorities and Routines (no authority for using routine)**

**I. Disconnects Between Routines; Disconnects Between Policy and Routines**

**State-Funded Pension**

1. Authorities:  
Statutory/Regulatory Authorities: 5 U.S.C. 552a(b)(3), 20 CFR 401.150, and SOR 60-0058 Routine Use #20.  
Purposes of Request: To validate SSNs used in administering cash or non-cash income maintenance programs or health maintenance programs.  
Conditions of Disclosure: Discretionary disclosure—Verification/validation only.
2. (b) (7)(E) batch processes: (b) (7)(E)
3. (b) (7)(E) processes furnish EVS reply (b) (7)(E).
4. With SVES the user also gets unique reply (b) (7)(E).
5. Disconnects: Although both processes provide the same set of basic EVS reply codes and multiple SSNs (see #3 above), SVES yields more search functions and is likely to provide different answers from using (b) (7)(E). Current SSA policy does not allow giving single select or multiple SSNs to the user.

**Workers Compensation**

1. Authorities:  
Statutory/Regulatory Authorities: 5 U.S.C. 552a(b)(3), 20 CFR 401.150, and SOR 60-0058 Routine Use #20.  
Purposes of Request: To validate SSNs used in administering cash or non-cash income maintenance programs or health maintenance programs (including programs under the Social Security Act).  
Conditions of Disclosure: Discretionary disclosure—Verification/validation only.
2. (b) (7)(E) batch processes: (b) (7)(E)
3. (b) (7)(E) processes furnish EVS reply (b) (7)(E).
4. With SVES user also gets unique reply (b) (7)(E).
5. Disconnects: Although both processes provide the same set of basic EVS reply codes and multiple SSNs (see #3 above), SVES yields more search functions and is likely to provide different answers from using (b) (7)(E). Current SSA policy does not allow giving single select or multiple SSNs to the user.

## **II. Disconnects Between Routines Only**




### **Employers**

#### 1. Authorities:

Statutory/Regulatory Authorities: 5 U.S.C. §552a(b)(3); 20 CFR 401.150; SOR 60-0058 Routine Use #1.

Purposes of Request: To complete employer records for reporting wages to SSA pursuant to the Federal Insurance Contributions Act and section 218 of the Social Security Act.

Conditions of Disclosure: Discretionary disclosure—release.

2. 
- 3.
- 4.
- 5.
6. Basic Pilot furnishes “match/no match/work not authorized.”
7.  and furnishes users exact matches only: “Y” for match or “call 800#” for “no match.”
8. Disconnects: Different routines furnish varied responses except for some similarities between planned  and planned SSNVS (both batch and real-time). Very little consistency in responses. No disconnects between policy and routines.






### **Internal SSA**

#### 1. Authorities:

Statutory/Regulatory Authorities: 5 U.S.C. §552a(b)(1).

Purposes of Request: To carry out their official duties.

Conditions of Disclosure: Discretionary disclosure—release, validation, or verification as needed to perform their official duties.

2.  real-time processes: 
3.  processes furnish unique codes and death data.
4.  also furnishes single select; and  furnishes multiple SSNs.
5. Disconnects: Although both processes furnish several identical codes (see #3 above), both provide an additional (different) search function. None between policy and routines.

### **Dept. of Education, U.S.**

#### 1. Authorities:

Statutory/Regulator Authorities: 20 U.S.C. §1091; 5 U.S.C. §552a(b)(3); 20 CFR 401.150; and SOR 60-0058 Routine Use #29.

Purposes of Request: SSNs that are provided by students to post-secondary educational institutions may be verified upon request by the Dept. of Education as required by Title IV of the Higher Education Act of 1965 (20 U.S.C. §1091).

Conditions of Disclosure: Mandatory disclosure—Release.

2. (b) (7)(E) batch processes: (b) (7)(E)
3. (b) (7)(E) processes furnish EVS (b) (7)(E)
4. With (b) (7)(E) user also gets (b) (7)(E)
5. With (b) (7)(E) user also gets EVS (b) (7)(E)
6. Disconnects: As shown in #4 and #5 above, results from the processes are dissimilar. (b) (7)(E) in #5 does a more thorough search (b) (7)(E), is more likely to give the user a “match” than the process in #4. No disconnects between policy and routines.

## OCSE

### 1. Authorities:

Statutory/Regulatory Authorities: Sec. 453(j)(1)(B) of the Act (42 U.S.C. §653(j)(1)(B)); 20 CFR 401.120.

Purposes of Request: To locate parents who owe child support.

Conditions of Disclosure: Mandatory disclosure—release. (“(SSA) shall verify the accuracy of, correct, or supply to the extent possible, and report to (HHS) the name, SSN, and birth date of individuals” included in the National Directory of New Hires.)

2. (b) (7)(E) batch processes: (b) (7)(E)
3. (b) (7)(E) processes furnish EVS (b) (7)(E)
4. With (b) (7)(E) user also gets EVS (b) (7)(E)
5. With (b) (7)(E), user also gets (b) (7)(E).
6. Disconnects: Both processes furnish several identical codes (see #3 above). (b) (7)(E) has one additional (b) (7)(E) and (b) (7)(E) verifies (b) (7)(E) so the two processes may not furnish the same answers. No disconnects between policy and routines.

## State Motor Vehicle Agencies

### 1. Authorities:

Statutory/Regulatory Authorities: 5 U.S.C. §552a(b)(3); 20 CFR 401.150; SOR 60-0058 Routine Use #34.

Purpose of Request: Validating personal identification data (i.e., name, SSN, and date of birth) concerning individuals who apply for, or are issued, drivers' licenses or other identification documents.

Conditions of Disclosure: Discretionary disclosure—validation only. “SSA would only verify that the personal identifying data submitted by the State MVAs match or do not match data in this system of records, and identify the data elements that do not match. SSA would not disclose the data contained in this system of records (such as name or SSN) if the MVA has non-matching data.”

2. (b) (7)(E) processes: (b) (7)(E) (batch) and SSOLV (real-time, uses (b) (7)(E)
3. With (b) (7)(E), user gets EVS (b) (7)(E)
4. With SSOLV, user gets (b) (7)(E) (b) (7)(E) thus preventing user access to single select and death data).
5. Disconnects: All output from the two processes is somewhat different; no disconnects between policy and routines.

**VA/VBA**

## 1. Authorities:

Statutory/Regulatory Authorities: 38 U.S.C. §§5106, 5313 and 3482; 5 U.S.C. §552a(b)(3); 20 CFR 401.150; and SOR 60-0058 Routine Use #15.

Purposes of Request: "...for purposes of determining eligibility for or amount of benefits, or verifying other information with respect thereto."

Conditions of Disclosure (Matching Agreement): Mandatory disclosure—release.

2. (b) (7)(E) processes: (b) (7)(E) (batch) and SOLQ (real-time).
3. (b) (7)(E) furnish single select.
4. (b) (7)(E) also returns reply (b) (7)(E).
5. SOLQ provides same codes as SVES batch process—i.e., returns "unique codes" including single select, "no surname" search, multiple SSNs, and death data. It also searches MBR/SSR. (SOLQ access is limited to (b) (7)(E)).
6. Disconnects: both processes furnish mostly dissimilar codes (see #4 and #5 above). SOLQ allows more search functions and is more likely to give the user a "match" than the process in #4 (i.e., (b) (7)(E)). No disconnects between policy and routines.

**III. No Disconnects****Medicaid**

## 1. Authorities:

Statutory/Regulatory Authorities: Sec. 1137 (b) of the Act (42 U.S.C. §1320b-7(b)); 5 U.S.C. §552a(b)(3); 20 CFR 401.150; and SOR 60-0058 Routine Use #2.

Purposes of Request: For administration of income-maintenance and health-maintenance programs—Specifically for administration of TANF, Food Stamps, Medicaid, Unemployment Compensation, and any State program under a plan approved under title I (old-age assistance for the aged), X (aid to the blind), XIV (aid to the permanently and totally disabled), or XVI (SSI).

Conditions of Disclosure: Discretionary disclosure—Release.

2. (b) (7)(E) processes: (b) (7)(E) (batch), SVES (batch, which uses (b) (7)(E)) and SOLQ (real-time, online SVES). (SOLQ access is limited to States that meet special online access requirements.)
3. All (b) (7)(E) processes furnish EVS reply (b) (7)(E).
4. With SVES and SOLQ, user also gets unique reply codes including (b) (7)(E).
5. Disconnects: None among processes (assuming there are reasons within the State agency to have different processes); none between policy and routines.

**Food Stamps**

## 1. Authorities:

Statutory/Regulatory Authorities: Sec. 1137 (b) of the Act (42 U.S.C. §1320b-7(b)); 5 U.S.C. §552a(b)(3); 20 CFR 401.150; and SOR 60-0058 Routine Use #2.

Purposes of Request: For administration of income-maintenance and health-maintenance programs—Specifically for administration of TANF, Food Stamps, Medicaid, Unemployment Compensation, and any State program under a plan

approved under title I (old-age assistance for the aged), X (aid to the blind), XIV (aid to the permanently and totally disabled), or XVI (SSI).

Conditions of Disclosure: Discretionary disclosure—Release.

2. (b) (7)(E) processes: (b) (7)(E) (batch), SVES (batch, which uses (b) (7)(E) ) and SOLQ (real-time, online SVES). (SOLQ access is limited to States that meet special online access requirements.)
3. All (b) (7)(E) processes furnish EVS reply (b) (7)(E) .
4. With SVES and SOLQ, user also gets unique reply codes (b) (7)(E) .
5. Disconnects: None among processes (assuming there are reasons within the State agency to have different processes); none between policy and routines.

## TANF

1. Authorities:

Statutory/Regulatory Authorities: Sec. 1137 (b) of the Act (42 U.S.C. §1320b-7(b)); 5 U.S.C. §552a(b)(3); 20 CFR 401.150; and SOR 60-0058 Routine Use #2.

Authorized Requestor: State and local entities authorized by Sec. 1137 (b) of the Act (42 U.S.C. §1320b-7(b)) to use SSN for the administration of specified income and health-maintenance programs (see below).

Purposes of Request: For administration of income-maintenance and health-maintenance programs--Specifically for administration of TANF, Food Stamps, Medicaid, Unemployment Compensation, and any State program under a plan approved under title I (old-age assistance for the aged), X (aid to the blind), XIV (aid to the permanently and totally disabled), or XVI (SSI).

Conditions of Disclosure: Discretionary disclosure—Release.

2. (b) (7)(E) processes: (b) (7)(E) (batch), (b) (7)(E) (batch), SVES (batch, which uses (b) (7)(E) ), and SOLQ (real-time, online SVES). (SOLQ access is limited to States that meet special online access requirements.)
3. All (b) (7)(E) processes furnish EVS reply (b) (7)(E) .
4. With (b) (7)(E) SVES and SOLQ—user also (b) (7)(E) .
5. With (b) (7)(E) , user also gets EVS reply (b) (7)(E) .
6. With SVES and SOLQ, user also gets unique reply codes (b) (7)(E) .
7. (b) (7)(E) .
8. Disconnects: None among processes (assuming there are reasons within the State agency to have different processes); none between policy and routines.

## Unemployment Insurance

1. Authorities:

Statutory/Regulatory Authorities: Sec. 1137 (b) of the Act (42 U.S.C. §1320b-7(b)); 5 U.S.C. §552a(b)(3); 20 CFR 401.150; and SOR 60-0058 Routine Use #2.

Purposes of Request: For administration of income-maintenance and health-maintenance programs—Specifically for administration of TANF, Food Stamps, Medicaid, Unemployment Compensation, and any State program under a plan approved under title I (old-age assistance for the aged), X (aid to the blind), XIV (aid to the permanently and totally disabled), or XVI (SSI).

Conditions of Disclosure: Discretionary disclosure—Release.



2. (b) (7)(E) processes: (b) (7)(E) (batch), SVES (batch, which uses (b) (7)(E) and SOLQ (real-time, online SVES). (SOLQ access is limited to States that meet special online access requirements.)
3. All (b) (7)(E) processes furnish EVS reply (b) (7)(E)
4. With SVES and SOLQ, user also gets unique (b) (7)(E)
5. Disconnects: None among processes (assuming there are reasons within the State agency to have different processes); none between policy and routines.

### Third Parties

1. Authorities:  
Statutory/Regulatory Authorities: 5 U.S.C. §552a(b) authorizes disclosure (SSN release) to third parties with written consent.  
Purposes of Request: Depending on consent agreement.  
Conditions of Disclosure: Mandatory disclosure—release.
2. (b) (7)(E) batch process: (b) (7)(E) furnishes (b) (7)(E)
3. Disconnects: None for process; none between policy and routines.

### OIG

1. Authorities:  
Statutory/Regulatory Authorities: 5 U.S.C. §552a(b)(1); or 20 CFR 401.120.  
Purposes of Request: To audit programs.  
Conditions of Disclosure: 5 U.S.C. §552a(b)(1) provides discretionary disclosure--release; 20 CFR 401.120 provides mandatory disclosure—release.
2. (b) (7)(E) batch process: (b) (7)(E) (OIG).
3. Furnishes EVS reply (b) (7)(E)
4. Disconnects: None for process; none between policy and routines.

### Death Reporters

1. Authorities:  
Statutory/Regulatory Authorities: 5 U.S.C. §552a(b)(3); 20 CFR 401.150; SOR 60-0058 Routine Use #37.  
Purposes of Request: State BVS requests SSA to verify the SSN of an individual on whom an electronic death report will be filed after SSN verification.  
Conditions of Disclosure: Discretionary disclosure—verification only.
2. (b) (7)(E) real-time process: (b) (7)(E) unique codes only, (b) (7)(E)
3. Disconnects: None for process; none between policy and routines.

### VA/VHA

1. Authorities:  
Statutory/Regulatory Authorities: 38 U.S.C. §§5106 and 5317; 5 U.S.C. §552a(b)(3); 20 CFR 401.150; and SOR 60-0058 Routine Use #15.  
Purposes of Request: "...for purposes of determining eligibility for or amount of benefits, or verifying other information with respect thereto."  
Conditions of Disclosure (Matching Agreement): Mandatory disclosure—release.

2. (b) (7)(E) batch process: (b) (7)(E)
3. (b) (7)(E) returns (b) (7)(E)
4. Disconnects: None for process; none between policy and routines.

### Prison Systems

1. Authorities:  
Statutory/Regulatory Authorities: 5 U.S.C. §552a(b)(3); 20 CFR 401.150; SOR 60-0058 Routine Use #25.  
Purposes of Request: Validated SSN information may be disclosed to these organizations or agencies that are required by law to furnish SSA with SSN information. (sec. 202(x) of the Act).  
Conditions of Disclosure: Discretionary disclosure—release, validation, or verification allowed.
2. (b) (7)(E) batch routines are used (b) (7)(E)
3. Disconnects: None for process; none between policy and routines.

### Law Enforcement Agencies

1. Authorities:  
Statutory/Regulatory Authorities: (a) 42 U.S.C. §1382(e)(5) and 20 CFR 401.120, for fugitive felons; (b) 5 U.S.C. §552a(b)(7); 20 CFR 401.155 for criminal activities specified in 20 CFR 401.155 or health or safety of an individual in 20 CFR 401.160; (c) ) 5 U.S.C. §552a(b)(3), 20 CFR 401.150; and SOR 60-0058 Routine Use #31 for protection of safety of SSA employees and customers, and the security or SSA workplace and facilities.  
Purposes of Request: See “Statutory/Regulatory Authorities” above.  
Conditions of Disclosure: Discretionary disclosure—release.
2. (b) (7)(E) batch processes: (b) (7)(E)
3. Disconnects: None for process; none between policy and routines.

Sources: Summary of SSN Verification Routines (Tab B), SSN Disclosure Policy—A Summary Chart (Tab A), and relevant covered non-covered matching agreements.

## EVS BATCH TOLERANCES

Verification tolerances can be used for:

(b) (7)(E)

Usage of tolerances may be based on:

(b) (7)(E)

Prior to processing the data, some data cleansing activities are performed. These activities include converting any lower case data to upper case and stripping out any special characters.

The input records are checked against various entries on the NUMIDENT to see if there is a match for each of the (b) (7)(E) elements identified above. Once a match is found, checking is stopped for that element. Not all elements have to match on the same entry. If there are four entries for an SSN, a different element could match on each entry. The checking begins with the most current entry and is performed chronologically from the most recent to the oldest.

A non-EVS program that passes data to a verification program can also edit the data that it receives from the verification process. In this manner, additional tolerances can be introduced before the data is returned to the requester.

For **Process** (b) (7)(E) **Batch processing**, the following tolerances apply:

(b) (7)(E)

(b) (7)(E)

(b) (7)(E) There are numerous variations possible for (b) (7)(E) is considered to be verified if:

(b) (7)(E)

(b) (7)(E)



(b) (7)(E)

(b) (7)(E)

(b) (7)(E)

(b) (7)(E)

(b) (7)(E)

(b) (7)(E)

(b) (7)(E)

## Terminology Definitions

**AAMVA - American Association of Motor Vehicle Administrators** includes membership from all State and Territory MVAs.

### **AAMVANET**

A service provided by AAMVA to its participating Motor Vehicle Authority members for, among other things, the purpose of securing SSN verifications for driver licensing purposes. The service is accessed either in batch or online real-time. (EVS 212NM or SSOLV for real-time.)

### **Alphident**

a specialized search routine. The Alphident is literally the SSN master file indexed by

(b) (7)(E)

(b) (7)(E)

The routine searches the Alphident when no SSN is provided by the requester, or when no match is found on the Numident for the data provided by the requester. Only certain users are entitled to use this routine (based on the process code assigned to them).

### **Batch**

Requests for information are collected and presented for processing as a “batch” of requests. Batches of requests are scheduled for system processing and the results are available after processing has occurred...generally, at least one day later, depending on the output media returned to the requester.

### **Connect Direct**

This is a software package and telecommunications link. It distributes data and manages production activities among multiple mainframes, minicomputers, and personal computers. SSA uses this software to send and receive large files in a batch mode.

### **Direct Terminal Access**

Certain agencies have been allowed access directly into SSA’s query system. This is the same real-time access SSA employees use. SSA personal identification numbers and passwords are issued to users and special security measures always apply.

### **EVS - Enumeration Verification System**

A collection of electronic batch SSN verification routines designed to serve a number of different users. (EVS may also be used in real-time.) Verification of SSNs is an automated process designed to inform a third party whether the information they have already collected about individuals’ SSNs matches the information in SSA’s records. The third party provides a listing of SSNs and names, usually dates of birth, and sometimes gender. SSA compares that information to its records and confirms or denies a match and, under certain routines, provides codes indicating where the problem occurred. The routines vary in how SSN verification searches are conducted, tolerances used in those searches, and in what information is returned to the users.

**FTMS**

File Transfer Management System

(b) (7)(E)

**MBR**

Master Beneficiary Record containing benefit information for all people receiving Title II benefits.

(b) (7)(E)

**No Surname**

Specialized search routine which ignores the surname offered and attempts to make a match using only the first name and the other information provided. Use of this routine is limited only to users with SSA approval.

(b) (7)(E)

**Numident**

SSA's enumeration information record system. Data held in this system is taken from SSN application forms (SS-5) and includes name, date of birth, place of birth, parent names, and other data. Search routines for this system are keyed to the SSN as the primary identifier. Most SSN verification routines start by comparing the SSN and other data provided for verification by the third party with the SSN and data in this system.

**Online**

Making a request for information electronically in real-time.

**Real-Time**

Responses to system queries are received shortly after they are requested on a terminal with access to SSA's mainframe. "Sub-second" response times are not uncommon.



## Release

means actual disclosure of an SSN.

## Single select

Single select is a very precise process

(b) (7)(E)

(b) (7)(E)

(b) (7)(E)

• (b) (7)(E)

• (b) (7)(E)

• (b) (7)(E)

The Office of General Counsel has informed us that release to employers (and certain other users) of SSNs identified through the use of single select represent allowable disclosures under the law.

## SOLQ - State Online Query

SOLQ is an electronic process for providing State authorized personnel the ability to access various SSA data bases by querying specific records of individuals. Information provided to the users is the same as that provided via use of SVES as defined below.

## SOUNDEX

An abbreviated version of a surname

(b) (7)(E)

## SSNVS

Social Security Number Verification Service is an online service that enables employers to verify employee names and SSNs. Interactive verification allows the entry of up to 10 names and SSNs to be verified with results returned immediately and viewed online or files of requests may be uploaded with SSN verification results available the next day. SSNVS invokes NOVU to perform the SSN verification search.

**SSOLV**

Social Security Online Verification...the real-time SSN verification process used for subscribing Motor Vehicle Authorities.

**SSR**

Supplemental Security Record containing benefit information for all recipients of Title XVI benefits.

**SVES - State Verification and Enumeration System**

SVES is a batch query that originates in the state, and is answered by SSA on an overnight basis. This system was designed to verify the SSN and retrieve information from the MBR and the SSR, depending on the State's request.

**TANF**

Temporary Assistance to Needy Families is a series of State or Tribal administered programs that replaced the Federal Aid to Families with Dependent Children program cash grants are paid to families which meet needs based criteria. TANF us part of Title IV of the Social Security Act.

**Tolerances**

Tolerances, as used in the context of EVS and online SSN verification, apply only to (b) (7)(E) See tab C for discussion of how tolerances generally apply to SSN verification routines.

**Verification**

The comparison of SSN and other information provided by an inquirer with similar information in our system for the purpose of verifying whether the information matches.

**VISN**

Vital Information Statistics Network

(E)(L)(q)

(E)(L)(q)

(E)(Z)(q)

(E)(L)(q)

(E)(L)(R)(q)



(E)(Z)(q)