

SOCIAL SECURITY NUMBER VERIFICATION BEST PRACTICES

Introduction

In today's political and economic environment, federal and state governments are looking to the driver licensing community to be leaders in identity security, as well as assist with other government programs. Both private and public entities look to driver license agencies to produce products that will assist them in their businesses. Since most citizens do business with driver license agencies on a regular basis, utilization of information contained in their databases and on the products they produce is extremely valuable.

Motor vehicle administrators (MVA) have traditionally felt their mission was to assure traffic safety, but it is now clear that consumer protection and identity security are equally significant. This being the case, they have accepted the role of issuing secure identification documents for non-driver related, as well as driver related purposes, and wish to maintain databases containing valid and secure information. The success of such programs like child support enforcement and issuance of secure identity are dependent upon accurate data. Use of paper documents to verify this data is no longer satisfactory since the production of fraudulent documents has risen dramatically in the past decade. Therefore, it is essential that driver licensing agencies and other government entities work together to collect and verify the most accurate data available.

Legislative Background

While the practice of collecting and verifying social security numbers (SSN) relates, in part, to the personal identification of a driver for the purposes of traffic safety, it has also been mandated in federal law for various reasons that are non-traffic related. Since 1986, several federal laws have been passed that require collection of SSNs.

1. 1986 Commercial Motor Vehicle Safety Act required all applicants for a commercial license to provide an SSN in order to receive a commercial driver license.
2. 1996 Personal Responsibility and Work Opportunity Reconciliation Act required collection of SSNs on every application for a professional license, commercial driver license, occupational license, or marriage license. It further required motor vehicle agencies to make their records available to state Child Support Enforcement offices for purposes of child support collection, and to develop procedures to withhold, suspend, or restrict driver licenses for failure to pay child support.

Appendix 10-6.3-03

3. Balanced Budget Act of 1997 amended the United States Code and required each state to have laws in effect requiring that the SSN of any applicant for a professional license, driver's license, occupational license, recreational license, or marriage license be recorded on the application.

In addition to federal mandates, individual state legislatures have placed requirements on MVAs.

Verification Background

Since 1986, all states have been required to collect SSNs from commercial driver license (CDL) applicants. For a variety of reasons, as suggested by the aforementioned legislation, many states are collecting SSNs from all driver license (DL) and identification card (ID) applicants who are eligible for and have been issued SSNs. In order to maintain accurate databases, verification of the SSNs is the next logical step.

While manual verification can be done by scrutinizing the SSN card or any of the SSN verification documents specified in the Acceptable Verifiable ID Resource List, the opportunity for fraud is high whenever paper documents are utilized for verification. In 1994, SSA received a request from California to verify SSNs for driver license applicants. At that time, SSA did not have a routine use under the Privacy Act to do this. But on September 15, 1994, the routine use to verify SSNs for state MVAs was approved.

Initially, the service was only available via a batch process between the state MVAs and SSA. States began requesting an online verification system and in 1997, AAMVA and SSA cooperatively developed the SSN Online Verification System (SSOLV) and piloted it in Idaho, Maine, and Tennessee. In January 1998, the system was in production in these states and soon other states began using the system.

Manual Verification

Even when utilizing a batch or online verification process, there must still be some physical inspection of the SSN card or other SSN verification documents specified on the Acceptable Verifiable ID Resource List. Only paper SSN cards issued from the SSA are acceptable. Do not accept metal or plastic replicas, or laminated cards. These facsimiles of SSN cards can be obtained easily from commercial suppliers who do not check the authenticity of the SSNs provided by their customers. Even the paper cards can be fraudulently made or duplicated, so it is important to establish review criteria and provide training to all processing employees.

See the Appendix for a sample "*Social Security Number Document Review*" guide.

Appendix 10-6.3-03

Electronic Verification

Both the batch and the online verification process verify data input from the inquiring state. States must submit the SSN, last name, and first name. They may also submit a middle name or initial, date of birth (DOB), and sex. SSA then compares that data using their Enumeration Verification System (EVS). There are matching tolerances in the program logic for names and DOB. SSA compares the information furnished with information in their system master files of SSN Holders and SSN Applications. For on-line verification only, SSA also checks their deceased file. SSA will respond, using one of the following responses.

On-Line Mode:

1 = Both name and DOB match

2 = Invalid SSN

3 = Name does not match, DOB matches

4 = DOB does not match, name matches

5 = Both name and DOB do not match

6 = We are unable to process the information for the SSN provided. Please review your information or have your customer visit a Social Security Administration office.

9 = System error, unable to process at this time.

Batch Mode:

0 = SSN verified by SSA as correctly assigned

1 = SSN not in file (impossible SSN/never issued/ or no SSN found)

2 = Name and DOB match, sex code does not

3 = Name and sex code match, DOB does not

4 = Name matches, sex code and DOB do not

5 = Name does not match, DOB and sex code not checked

Once verification is accomplished, the driver record should be marked so that the customer does not have to verify the number each time a transaction is completed.

Considerations

While both processes offer a high level of verification integrity, each system has some unique considerations.

Batch verification:

- Can only be utilized by those states with centralized issuance.
- Can create issuance delays because the process takes up to 72 hours. If there are non-matches, clarification will require letters and telephone calls that will further delay issuance. This will also increase the MVA workload and customer inconvenience.

Appendix 10-6.3-03

- May be the best process for verifying SSNs in the MVA's existing database rather than waiting to verify the SSN at the time of the customer's next visit to a motor vehicles office. This will allow the MVA and the customer time to resolve non-match problems without affecting their current DL/ID card privileges.
- Costs approximately \$.001509 per inquiry once implementation is accomplished.

On-line verification:

- Allows for immediate clarification in some non-match situations because the customer is in the office at the time of verification. Even if the customer must make an additional trip to the MVA or to SSA to correct information, there is less delay because they can be told immediately rather than waiting for a letter.
- Is best utilized for new transactions, e.g., original, renewal, or duplicate applications.
- Costs approximately \$.03 per inquiry, once implementation is accomplished. While this is more costly than a batch process, the cost may be offset by a reduced workload created in batch processing to clarify non-match issues.
- Can result in system downtime delaying verification and extending transaction processing for the MVA.

Both processes –

- Both processes utilize matching tolerances in the name and DOB fields. This can be helpful, but it can result in non-matches depending on how the MVAs enter hyphenated names and other irregular name configurations. The MVA should have a clear understanding of how the SSA stores names in order to minimize these occurrences.

There is a one year tolerance, plus or minus, on the year of birth if the month matches exactly. In light of the emphasis on identity security, it may be better to indicate a non-match.

- Different match codes are used for batch mode than for on-line mode. This can cause confusion for verifying states that use both processes.
- All input data is not verified prior to returning a match code to the MVA. The EVS matching routine will discontinue searching if the SSN is incorrect and will return a non-match code without validating the other data. If the SSN matches but the name does not, the search will stop and a non-match code will be returned to the MVA without validating the DOB or other data.

Appendix 10-6.3-03

- SSA requires that a person's payroll name be captured in their system since that is the purpose of issuing an SSN. AAMVA recommends that MVAs collect and store a person's true legal name in order to clearly identify the person. These business needs can be in opposition. Someone may do business under a different name, e.g., actors, than the name that appears on personal identification such as DL/ID cards. It is not appropriate for either SSA or MVAs to require the person to change her/his name on the other agency's record. Some process must be established between the state's SSA offices and the MVA.
- Some non-match codes are not as specific as they could be. For example, code 6 in the on-line mode reads, "We are unable to process the information for the SSN provided." These types of messages make it more difficult to identify the verification problem.
- Duplicate SSNs have been issued and are not changed unless requested by the SSN holder. SSA does not indicate in their output when a number is a duplicate. This may cause unnecessary concern about a person's identity or whether fraud has been committed.

Prior to making a choice, you should carefully consider all of these issues and should understand completely how both processes work. For more detailed information, refer to the Social Security Administration's, "*Enumeration Verification System Processing Code 213 for Department of Motor Vehicles*" for batching processing information and the "*Social Security Number Online Verification Application System Specifications*" for on-line processing information. For further information, contact AAMVA's Operations Department.

Memorandum of Agreement

Regardless of which process is used, a Memorandum of Agreement (MOA) must be established between the state MVA and the SSA. In some cases, the batch process will require an additional Memorandum with a government agency within the state that will serve as the conduit for the electronic transmission of batch verifications. If a jurisdiction wishes to do both batch and on-line verification, then separate MOAs must be done with SSA for each type of verification.

Appendix 10-6.3-03

Memorandums should be specific and should contain:

- Purpose of Agreement
- Period of Agreement
- Modification or Cancellation Provision
- Authority to Perform the Function
- Functions to be Performed
- Consent Language to Collect the SSN
- Referral of Individuals to SSA
- Reimbursement

Refer to the model “*Memorandum of Agreement Between (State Name and Name of DMV) and the Social Security Administration*” for on-line processing in the Appendix.

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APPENDIX

Sample A - Social Security Number Document Verification

Sample B - Memorandum of Agreement Between (State Name and Name of DMV) and the Social Security Administration.

Appendix 10-6.3-03

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