

Justification for Inclusion of SSN on Disabled Dependent Questionnaire for RI 30-10

The Office of Personnel Management (OPM) utilizes form RI 30-10 to request information regarding annuitants' and survivor annuitants' disabled dependents who are incapable of self-support. These dependents' affairs are usually handled by someone other than the dependent. OPM establishes a Representative Payee for those who are incapable of handling their own affairs. There are varying factors that have to be considered in these cases most - importantly making sure that the funds are handled properly. The office of Retirement Eligibility and Services (RES) in OPM has the responsibility to maintain the integrity of the retirement annuity roll. RES ensures that the retirement funds are being used for the benefit of the disabled dependent in cases involving representative payees. Therefore, it is being requested that the social security number (SSN) be included on form RI 30-10 to assist RES in tracking and investigating instances of fraud and abuse of government funds (benefits) of payees.

Several other agencies have similar circumstances regarding the processing of benefits. We will refer to the Department of Veterans Affairs (VA) regarding their processes in obtaining and storing information on payees.

The Department of Veterans Affairs provides benefits to veterans of the military. They have a fiduciary program set up for payment to those the VA has determined are mentally incompetent. They too are on the lookout for any instance of misuse or negligence on the part of the fiduciary. Misuse in these cases includes instances when the beneficiary does not profit from VA benefits.

The VA has set up various guidelines on how they determine fiduciary eligibility including visits to the beneficiary and fiduciary. Staff conducts visits to the fiduciary which include general background checks (i.e., contact of character witnesses and review of credit reports) and annual financial reports to determine how the funds are being managed. In 2005, the VA established a new policy as a result of the Veterans' Benefits Improvement Act of 2004 for professional fiduciaries of more than 20 beneficiaries for occasional on-site reviews. It was still determined that not all fiduciaries in this category can be reliably identified. They use a match to identify beneficiary and fiduciary. The matches are linked by name and not SSN. This provides for issues since the names can be recorded incorrectly or inconsistently, for example, same name different spellings. They have recognized that a more unique identifying marker such as a SSN for the fiduciary would assist in fewer errors identifying fiduciaries.¹

The Government Accountability Office (GAO) presented a report in 2002 that refers to the benefits of federal agency use of SSN's. There are definite instances of use of SSN associated with benefit payments. A couple of examples are the Omnibus Budget Reconciliation and Trade Act of 1990 38 U.S.C. 510 which required people to provide SSN's for VA benefits. Another is the Debt Collection Improvement Act of 1996 31 U.S.C. 7701 which required those

¹ (GAO, Safeguarding Veterans' Resources, GAO-10-241, February 2010, p.2)

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with business dealings with the federal government to provide SSNs for items such as benefit payments.

The use of SSN's has been determined useful for agencies with programs administering benefits, primarily, because the SSN is specific to an individual and unchangeable. As mentioned earlier, there could be incorrect reporting or inconsistencies when using names only as identifying factors. The SSN links between agencies would allow for greater capacity in data sharing to compare benefit information increasing the integrity of the program. Ultimately we want to avoid payment of benefits to those who should not be paid saving the government millions of dollars.²

² (GAO, Government Benefits from SSN Use, GAO-02-352, May 2002)