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Social Security Numbers

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PROPERTY RECORDS INDUSTRY ASSOCIATION

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Table of Contents

What Is a Social Security Number (SSN)?.....	4
Structure of a SSN.....	5
What Happens When the SSN Is Masquerading as Another Number?	6
Social Security Number Fraud Prevention Act of 2017	7
Statement from CISA (Cybersecurity and Infrastructure Security Agency)	8

What Is a Social Security Number (SSN)?

In the United States, a **Social Security Number (SSN)** is a unique nine-digit number issued to U.S. citizens, permanent residents, and temporary (working) residents under section 205(c)(2) of the Social Security Act, codified at 42 U.S.C. § 405(c)(2). The Social Security Administration (SSA), an independent agency of the United States government, issues the number to an individual.

The original purpose of the SSN was to track individuals' accounts within the Social Security program. The SSN has since come to be used as a unique identifier for individuals within the United States, although in rare instances errors occur and duplicate numbers exist. Employee, patient, student, and credit records are sometimes indexed by SSN.

Structure of a SSN

The SSN is a nine-digit number originally designed in the format "AAA-GG-SSSS." The number is divided into three parts.

- The Area Number (AAA), the first three digits, is assigned by geographical region. The Area Number may represent the area where the applicant lived, where the card was issued, or a zip code. However, it does not necessarily represent the state of residence of the applicant.
- The middle two digits are the Group Number (GG). The Group Numbers range from 01 to 99. Group Numbers are not assigned in consecutive order, but in a predetermined order. The SSA periodically published a list of High Group Numbers specifying the highest Group Number that had been validly issued for any given Area Number.
- The last four digits are Serial Numbers (SSSS). They represent a straight numerical sequence of digits from 0001-9999 for any given Group Number.

On June 25, 2011, the SSA changed the SSN assignment process to "SSN randomization."¹ SSN randomization affects the SSN assignment process in the following ways:

- It eliminates the geographical significance of the first three digits of the SSN, currently referred to as the Area Number, by no longer allocating the Area Numbers for assignment in specific states.
- It eliminates the significance of the highest Group Number and, as a result, the High Group Number List will be frozen in time and can only be used for validation of SSNs issued prior to the randomization implementation date.
- Previously unassigned Area Numbers will be introduced for assignment excluding Area Numbers 000, 666, and those in the 900-999 range.

¹ The SSA formula alteration was a result of two Carnegie Mellon researchers being able to predict an individual's SSN from other publicly available data using the prior number assignment method- www.ssnstudy.org.

What Happens When the SSN Is Masquerading as Another Number?

SSNs were originally developed as unique identifiers, well before the advent of sophisticated methods of using and combining data files became available. Although the main legislated uses of SSNs are by the SSA and the Internal Revenue Service (IRS), SSNs have become ubiquitous as identifiers in both credit files and even health-related files. SSNs have masqueraded as other numbers, for example, when many states utilized SSNs as Driver's License numbers. This practice has ceased due to privacy concerns and implementation of the REAL ID Law.²

The SSN has also traditionally been a part of the Medicare Health Insurance Claim number, although inconsistently so. Surviving spouses of Medicare beneficiaries who do not themselves have Medicare coverage, for example, may have their late spouse's SSN as their Medicare Health Insurance Claim number. The use of the SSN in the Medicare context is tied to reimbursement. However, inaccuracies in the recording and reporting of the claim number constitute the number one reason that Medicare claims are returned to the provider. Effective January 1, 2020, Medicare started using a different, perhaps less cumbersome, numbering system. Virtually all algorithmic identification systems make some use of SSNs, and none works as well without the SSN.

In California, the state Franchise Tax Board uses a SSN with the addition of numbers and/or letters to turn a SSN into an account number.

² https://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_realidfr.pdf

Social Security Number Fraud Prevention Act of 2017

In 2017, Congress passed H.R. 624³ to restrict inclusion of SSNs sent by mail and for other purposes. Federal Agencies may not include the SSN of an individual on any document sent by mail unless it is determined necessary by the head of the agency. The head of each agency is required to specify cases where including the SSN is necessary no later than five years (2022) from the date of enactment. If necessary, the agency must include:

- Instructions for the partial redaction of SSNs where feasible
- Requirement that SSN must not be visible on the outside of any package sent by mail

Agencies are required to submit plans within 30 days of enactment and prior to the anniversary enactment date for the next five years to include:

- The title and identification number of any document used by the Chief Financial Officer (CFO) Act agency during the previous year that includes the complete social security account number of an individual.
- For the first report submitted, a plan that describes how the CFO Act agency will comply with the requirements.
- For the final report submitted, the title and identification number of each document used by the CFO Act agency.

³ <https://www.congress.gov/bill/115th-congress/house-bill/624/text>

Statement from CISA (Cybersecurity and Infrastructure Security Agency)

CISA was established in 2018 as a standalone agency under the oversight of the Department of Homeland Security. In a collaboration with industry leaders, the agency produced a “moonshot” plan to make the internet safe by 2028. This will require an “identity paradigm shift.”

The Agency’s (then) Director Christopher Krebs speaking at a security conference in 2020 said, “What are the things we can do down the road to help ensure that we have a more secure identity? Move away from the SSN as an identification element.” His agency wants to eliminate reliance on SSNs.⁴

Despite several massive data breaches, efforts to reduce the use of SSNs by government agencies have been slow.

⁴ <https://www.nextgov.com/cybersecurity/2020/02/cisa-director-pushes-discontinue-social-security-numbers-identification/163340/>