

# ***CONGRESSIONAL RESPONSE REPORT***

## ***Compliance with Employment Evidence Requirements for F-1 Students***

**A-08-06-16075**



**July 2006**

## **Mission**

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

## **Authority**

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

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

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

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

## **Vision**

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



## SOCIAL SECURITY

July 20, 2006

The Honorable Susan M. Collins  
Chairwoman, Committee on  
Homeland Security and Governmental Affairs  
United States Senate  
Washington, D.C. 20510

Dear Madam Chairwoman:

At a June 28, 2004 briefing, representatives from your staff requested that we conduct a survey and audit of educational institutions' policies and practices of issuing work authorization letters to help foreign students obtain a Social Security number (SSN). The objectives of our survey were to determine selected educational institutions' policies and practices for (1) issuing work authorization letters to foreign students and (2) monitoring the enrollment, attendance and employment of these students. Additionally, we reviewed actions the Social Security Administration (SSA) took to strengthen controls over assigning SSNs to foreign students. We issued the survey report, *Congressional Response Report: Survey of Educational Institutions' Issuance of Work Authorization Documents to Foreign Students (A-08-04-24102)* on September 30, 2004 and planned to issue an audit report by December 31, 2004. However, SSA implemented a new regulation that affected our audit objectives. Therefore, we postponed the audit to cover the educational institutions' fall 2005 enrollment period to allow SSA to fully implement the new regulation.

The enclosed report summarizes the results of our audit. Our audit objectives were to (1) determine whether foreign students receiving SSNs based on work authorization letters from schools and documentation of promised or actual employment enrolled in and attended classes and are employed on-campus and (2) identify vulnerabilities in the process.

To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

If you have any questions or would like to be briefed on this issue, please call me or have your staff contact H. Douglas Cunningham, Assistant Inspector General for Congressional and Intra-Governmental Liaison, at (202) 358-6319.

Sincerely,

A handwritten signature in black ink, appearing to read "P. O'Carroll, Jr.", written in a cursive style.

Patrick P. O'Carroll, Jr.  
Inspector General

Enclosure

cc:  
Jo Anne B. Barnhart

## OBJECTIVES

Our objectives were to (1) determine whether foreign students receiving Social Security numbers (SSNs) based on work authorization letters from schools and documentation of promised or actual employment enrolled in and attended classes and were employed on-campus and (2) identify vulnerabilities in the process. This audit is the second part of a request from the Senate Committee on Homeland Security and Governmental Affairs (Committee).

At a June 28, 2004 briefing, Committee staff members requested that we conduct a survey and audit of educational institutions' policies and practices of issuing work authorization letters to help foreign students obtain an SSN. The objectives of our survey were to determine selected educational institutions' policies and practices for (1) issuing work authorization letters to foreign students and (2) monitoring the enrollment, attendance and employment of these students. Additionally, we reviewed actions the Social Security Administration (SSA) took to strengthen controls over assigning SSNs to foreign students. We issued the survey report, *Congressional Response Report: Survey of Educational Institutions' Issuance of Work Authorization Documents to Foreign Students (A-08-04-24102)* on September 30, 2004 and planned to issue our audit report by December 31, 2004. However, SSA implemented a new regulation that affected our audit objectives. Therefore, we postponed the audit to cover the educational institutions' fall 2005 enrollment period to allow SSA to fully implement the new regulation.

## BACKGROUND

To study in the United States, a foreign student must apply for admission at a school approved by the Department of Homeland Security (DHS).<sup>1</sup> Upon acceptance, relevant student information is recorded in DHS' Student and Exchange Visitor Information System<sup>2</sup> and a Form I-20, *Certificate of Eligibility for Nonimmigrant (F-1) Student Status*,

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<sup>1</sup> To be eligible to accept nonimmigrant students, educational institutions must be approved by DHS. Generally, schools must submit a petition to DHS and prove it (1) is a bona fide school; (2) is an established institution of learning or other recognized place of study; (3) possesses the necessary facilities, personnel, and finances to conduct instruction in recognized courses; and (4) is, in fact, engaged in instruction in those courses. Additionally, an authorized representative of the petitioner may be required to appear in person before an immigration officer prior to the approval. Further information can be found in 8 C.F.R. § 214.3.

<sup>2</sup> The Student and Exchange Visitor Information System is an internet-based system that allows educational institutions, the United States Citizenship and Immigration Services, Immigration and Customs Enforcement, Customs and Border Protection and U.S. Consulates to track, monitor, access and exchange the most accurate and current data on the visa status of international students and their dependents.

is sent to the student. A copy of the Form I-20 is submitted with the student visa application to an Embassy or Consulate, where it is reviewed and approved by Department of State personnel. With the visa, passport, and Form I-20, the student travels to a U.S. port of entry where DHS determines whether the student is admitted or denied admission.<sup>3</sup> Students who are admitted proceed to their school.

Almost 600,000 foreign students were enrolled in educational institutions in the United States during the 2004-2005 academic year. As in our prior survey, our audit focused on students with F-1 classifications.<sup>4</sup> We elected to do so because F-1 foreign students are unique in that they are eligible to work on campus without obtaining specific approval from DHS. Instead, DHS requires that the school ensure the F-1 student is attending classes full-time and is in good academic standing. If so, the student is eligible to work on campus up to 20 hours per week while school is in session.

Because the SSN has become a de facto identifier nationwide, the number is key to social, legal, and financial assimilation in this country, not simply an employment requirement. Foreign students are often asked for their SSN when seeking such basic services as housing, cellular telephones and utilities. As a result, many foreign students believe they need an SSN to fully function in U.S. society.

To obtain an SSN, students must provide SSA evidence of age, identity, legal *work-authorized* alien status and enrollment in a DHS-approved educational institution.<sup>5</sup> Additionally, effective October 13, 2004, F-1 students who do not have a DHS Employment Authorization Document or authorization for curricular practical training must provide evidence of on-campus work authorization and verification that the student has secured employment or a promise of employment before SSA will assign an SSN.<sup>6</sup>

SSA does not place an expiration date on any SSN card and the SSN is never deleted or reassigned to another person. As such, once assigned, an SSN is associated with the numberholder throughout and beyond his or her life—in SSA records. SSN cards for F-1 students are annotated with the legend “Valid for Work Only With DHS Authorization.” While current law does not require that a student (or any other numberholder) present the actual SSN card to an employer—or any other entity from whom the numberholder is attempting to obtain services (for example, credit card

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<sup>3</sup> Before SSA approves an SSN application, the Agency examines and evaluates all evidentiary documents submitted and verifies the student’s immigration status with DHS. However, SSA is not required to independently consult the Government’s terrorist watch lists before assigning an SSN. Rather, SSA relies on the Department of State and DHS to determine who is granted or denied a visa and entry into the United States—as those functions, by law, belong to those agencies, not SSA.

<sup>4</sup> The F-1 classification includes academic students in colleges, universities, seminaries, conservatories, academic high schools, other academic institutions and language schools.

<sup>5</sup> SSA maintains a searchable database of DHS-approved schools, which field office staff use when processing an F-1 student’s SSN application to ensure the student is attending a DHS-approved school.

<sup>6</sup> 20 C.F.R. § 422.107(e)(2).

companies and banks), some employers may require them to do so as part of the hiring process. Accordingly, an F-1 student may obtain an SSN and continue to use it to work, obtain credit or conduct other business in the United States after their DHS authorization to be in the country has expired.

To accomplish our audit objectives, we identified 24,504 F-1 students from 193 countries whom SSA assigned original SSNs from July 15 through September 30, 2005 (see Appendix A). We then selected a random sample of 250 students representing 59 countries and contacted their respective schools to verify their attendance and work status (see Appendix B). The schools varied in size from large academic institutions to small language schools. From the respective schools, we requested information regarding the sampled F-1 students' (1) enrollment status, (2) start date of on-campus employment, and (3) type of job in which the student was employed. We based our conclusions on the responses provided by the schools and any necessary follow-up discussions. We also solicited information from SSA regional offices about their experiences in assigning SSNs to F-1 students. Additional information regarding our scope and methodology is provided in Appendix C.

# Results of Review

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We are encouraged that schools reported 96 percent of the students in our sample were enrolled in classes and working on campus. We were also encouraged by the positive feedback from SSA regional offices regarding the implementation of the requirement for F-1 students to provide employment documentation. However, we identified situations that demonstrated the process remained vulnerable to misuse by some students and schools. Based on our sample review and field office reports, we identified potential problems with (1) students accepting positions on campus but working only 1 or 2 days and (2) some schools providing employment documentation with no intention of hiring the student.

## **MOST F-1 STUDENTS COMPLIED WITH POLICIES TO OBTAIN AN SSN**

Of the 250 F-1 students for whom we attempted to verify attendance and work status, 240 (96 percent) either accepted or were promised employment on campus—as required by SSA policy. According to their respective schools, 9 (3.6 percent) of the 250 F-1 students in our sample were not employed.<sup>1</sup> Additionally, we were unable to obtain the school's name for one F-1 student from SSA information.<sup>2</sup> Finally, for the 249 F-1 students whose schools we contacted, all were enrolled.

As a result, of the 24,504 F-1 students whom SSA assigned original SSNs from July 15 through September 30, 2005, we estimate that about 23,524 were enrolled in school and accepted or were promised employment on campus. We estimate approximately 882 F-1 students were also enrolled in school but were not actually employed and therefore may have obtained original SSNs for purposes other than on-campus employment.

Based on the information provided by the schools, we categorized the students' on-campus employment into six categories. About 46 percent of the F-1 students in our sample have some type of teaching assistantship. These students receive stipends in

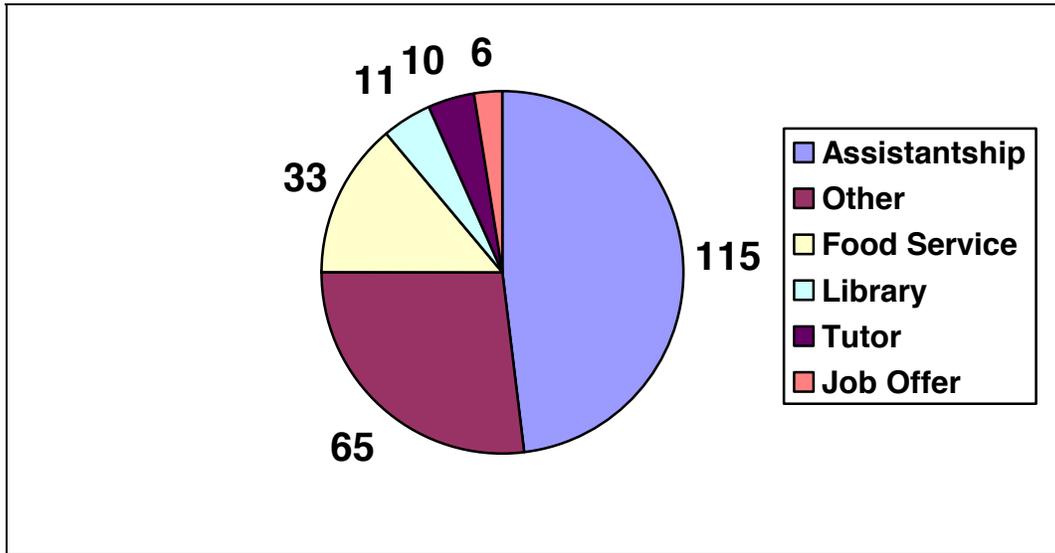
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<sup>1</sup> Originally, 13 schools reported to us that an F-1 student in our sample was not employed on campus. However, after further review by our Office of Investigations, the responsible schools revised their responses for four of these students and confirmed that they actually were employed on campus.

<sup>2</sup> When processing the SSN application for this student, the field office employee did not document the name of the educational institution, as required by SSA POMS section RM 00203.470(L)(7)(e.).

lieu of pay; however, the portion of the stipend applied to living expenses is taxable as income. Other popular employment among F-1 students included working in food services, working at the library or tutoring.

Figure 1: Types of Employment Reported for F-1 Students



Of the 250 F-1 students in the sample, 108 (43 percent) acquired drivers' licenses or State identification cards. Additionally, of the nine students reported unemployed by their respective schools, seven (78 percent) acquired drivers' licenses or State identification cards.

### Additional Information on the Nine Schools who Reported an Unemployed Student

The nine unemployed students attended a variety of academic and technical/English as a second language (ESL) schools. Six schools were traditional academic schools, and three provided technical and/or English as a second language certificate programs.

For the nine students who were unemployed, several school representatives expressed surprise that the students obtained an SSN because the school did not provide the student documentation for work authorization or employment verification. It appears SSA processed some applications for SSNs without requiring that the student provide all the appropriate documentation. For example, one school representative reported giving a student a document stating that, based on his F-1 classification, he was authorized to work on campus. However, the representative did not provide the student necessary evidence of actual or offered employment. She supplied the authorization document so the student could get a rejection letter<sup>1</sup> from SSA to take to the Department of Motor Vehicles and apply for a driver's license.

<sup>1</sup> Some State Departments of Motor Vehicles require a letter from SSA stating that the individual is not eligible to obtain an SSN before they will allow the individual to obtain a driver's license. For the purposes of our audit, we referred to such notices as "rejection letters."

Our Office of Investigations further analyzed these nine F-1 students. This expanded analysis included inquiries of SSA's earnings data, additional contacts with the schools, interviews of SSA employees who processed the SSN applications, and, in some cases, interviews with the students.

The expanded review confirmed that six of the students were not employed on campus. Special Agents confiscated two SSN cards during student interviews; however, no fraud was discovered. One school inappropriately provided documentation when the student applied for employment. The school neither promised the student employment nor employed the student. In other cases, it appears SSA did not follow procedures when processing the SSN applications. We could not determine which party was at fault in two cases. Investigations are still in progress for the remaining three students.

## **STUDENTS MAY HAVE CAPITALIZED ON VULNERABILITIES IN THE PROCESS**

Even though SSA strengthened the F-1 enumeration process through its more stringent requirements, it appears some F-1 students may have taken advantage of vulnerabilities remaining in the process.

We received several reports from schools responding to our sample, as well as SSA field offices, regarding students working at jobs for a short period of time (that is, 1 or 2 days) or not starting work at all. The respondents believed the F-1 students obtained offers of employment simply to qualify for an SSN but had no intention of starting or continuing to work on campus. For example, at one school, an F-1 student worked in Media Services for 1 day. At another school, a student worked in the bookstore for 3 days. Additionally, after reviewing an allegation received from 1 of the SSA field offices regarding a school in our universe, we noted that, although the school posted earnings for 43 of the 45 F-1 students who obtained SSNs during our audit period, 27 (63 percent) had total wages of only \$5.15—the equivalent of 1 hour of work.

There were also reports that students decided not to accept job offers after confirming their class schedules. One school representative expressed concern that this trend will adversely affect foreign students who need to work on campus because employers will stop offering foreign students jobs.

## **OPPORTUNITIES EXIST FOR SCHOOLS TO FACILITATE SSN ATTAINMENT**

Although not identified in our sample of 250 F-1 students, we have received anecdotal information from our Office of Investigations and input from SSA field offices that suggests that some schools may have facilitated F-1 students' attainment of SSNs by providing and confirming employment—with no real intent to hire the student. For example, several field offices reported that students admitted they had no plans to work once they obtained an SSN. Appropriately, upon hearing these admissions, field office employees denied the SSN applications. However, in some instances, these students

then returned to the field office with the required documentation from their school stating they were working on campus. Field office personnel also reported concerns that some schools were providing evidence of employment to a large number of F-1 students even though the schools were small and the number of on-campus jobs seemed disproportionate.

For example, one small technical training school provided work documentation for 88 F-1 students during our audit period. Before our audit, the local field office recognized this school was providing documentation for an unusually large number of on-campus positions and communicated its concern to us. Accordingly, we opened an investigation into this educational institution's practices. Preliminary results indicate the subject school advertises in immigration circulars/newspapers that it will help immigrants obtain driver's licenses and SSNs but does not include information about the school or its programs in the advertisements. The school allegedly charges students \$3,000 for tuition. However, the tuition may be in exchange for documentation evidencing work authorization and actual or offered employment. Yet, the school has no intent to hire the individuals or ensure they attend classes. In fact, quarterly earnings records for some of the schools purported students indicated they were working off campus in places such as beauty salons and restaurants. Four of the schools' F-1 students were included in our sample. In each case, the school verified the students were enrolled in classes and working on campus. However, we did not independently verify this information because the activities of this school are still under investigation.

We also found that certain types of jobs, such as tutors, can be vulnerable to abuse. School representatives for two students in our sample reported they employed the students as tutors. However, the school representatives added the students had not worked because there was no demand in the subjects they were assigned. For example, one school representative reported the student had not begun work because no one had requested a Physics tutor.

## *Conclusions*

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We are encouraged by our sample results and the positive feedback from SSA field offices regarding schools' and students' compliance with F-1 enumeration regulations. However, we remain concerned that students and schools may manipulate the process to inappropriately obtain SSNs. As such, we encourage Congress and SSA to closely monitor this program. If Congress continues to believe F-1 students should only be assigned SSNs in limited circumstances, additional measures may be warranted. We also believe more should be done to limit the use of the SSN to only legally sanctioned purposes to alleviate the pressure for students to obtain SSNs to fully function in our society. We recognize that limiting the SSN's use in society may require legislation. Because we identified situations that demonstrated the process remained vulnerable to misuse by some students and schools, we plan to conduct additional work to assess F-1 students' use of SSNs and identify schools that may have facilitated F-1 students' attainment of SSNs by providing employment documentation with no intention of hiring them.

# *Appendices*

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**APPENDIX A** – Countries of Origin for 24,504 F-1 Students Assigned Social Security Numbers (July 15 - September 30, 2005)

**APPENDIX B** – Countries of Origin for 250 F-1 Students in the Office of the Inspector General Sample (July 15 – September 30, 2005)

**APPENDIX C** – Scope and Methodology

**Countries of Origin for 24,504 F-1 Students Assigned Social Security Numbers (July 15 – September 30, 2005)**

<i>Country Name</i>	<i>Number of F-1 Students</i>
India	7012
China	4209
South Korea	1375
Canada	705
Taiwan	653
Japan	632
Nepal	573
Turkey	520
Kenya	408
Mexico	365
Germany	362
Poland	286
Brazil	268
Nigeria	260
Colombia	259
Vietnam	222
United Kingdom	219
Romania	205
Indonesia	196
Jamaica	191
France	189
Thailand	184
Russia	174
Bulgaria	171
Philippines	154
Iran	152
Pakistan	146
Sri Lanka	141
Ghana	136
Peru	136
Malaysia	129
Italy	106
Venezuela	106
Bangladesh	103

**Countries of Origin for 24,504 F-1 Students Assigned Social Security Numbers (July 15 – September 30, 2005)**

<i>Country Name</i>	<i>Number of F-1 Students</i>
Spain	101
Trinidad and Tobago	96
Ecuador	95
Israel	89
Ukraine	85
Greece	84
Mongolia	82
Hong Kong	77
Cameroon	75
Singapore	75
Ethiopia	70
Argentina	68
South Africa	66
Zimbabwe	62
Chile	60
Lebanon	59
Australia	58
Zambia	58
North Korea	56
Tanzania	56
Bahamas	54
Egypt	54
Czech Republic	53
Jordan	52
Sweden	52
Serbia	48
Saudi Arabia	44
Morocco	43
Netherlands	40
Uzbekistan	40
Dominican Republic	39
Uganda	39
Bolivia	38
Kuwait	38
Honduras	37
Hungary	34
Costa Rica	32

**Countries of Origin for 24,504 F-1 Students Assigned Social Security Numbers (July 15 – September 30, 2005)**

<i>Country Name</i>	<i>Number of F-1 Students</i>
Haiti	32
United Arab Emirates	32
Guatemala	31
New Zealand	31
Switzerland	30
Croatia	29
Austria	27
Slovakia	27
Lithuania	26
Portugal	26
Myanmar	25
Norway	25
Panama	24
Uruguay	24
Senegal	23
Belgium	22
Cambodia	22
Kazakhstan	22
Albania	21
Congo	21
Gambia	20
Georgia	20
Ivory Coast	20
Yugoslavia	20
Afghanistan	19
Armenia	19
Bosnia and Herzegovina	19
St. Lucia	19
Tajikistan	19
Guyana	18
Moldova	18
Azerbaijan	17
Belarus	17
Ireland	17
El Salvador	17
Grenada	17
Niger	17

**Countries of Origin for 24,504 F-1 Students Assigned Social Security Numbers (July 15 – September 30, 2005)**

<i>Country Name</i>	<i>Number of F-1 Students</i>
Denmark	16
Cyprus	15
Latvia	15
Nicaragua	15
Paraguay	15
Syria	15
Belize	14
Barbados	13
Benin	13
St. Kitts and Nevis	13
Burkina Faso	13
Mauritius	13
Estonia	12
Iceland	11
Iraq	11
Malawi	11
Macedonia	11
Mali	11
Sierra Leone	11
Turkmenistan	11
Antigua and Barbuda	9
Dominica	9
Eritrea	9
Rwanda	9
Finland	8
Kyrgyzstan	8
Montenegro	8
Netherlands Antilles	8
Tunisia	8
Algeria	7
Liberia	7
Oman	7
Togo	7
Bahrain	6
Botswana	6
Bhutan	6
Democratic Republic of Congo	6

**Countries of Origin for 24,504 F-1 Students Assigned Social Security Numbers (July 15 – September 30, 2005)**

<i>Country Name</i>	<i>Number of F-1 Students</i>
Gabon	6
Qatar	6
St. Vincent and Grenadines	6
Cayman Islands	5
Guinea	5
Libya	5
Macau	5
Mozambique	5
Swaziland	5
Angola	4
Brunei	4
Central African Republic	4
Lesotho	4
Sudan	4
Yemen	4
Aruba	3
Chad	3
Cuba	3
Fiji	3
Slovenia	3
Ukrania	3
British Virgin Islands	3
West Bank	3
Anguilla	2
Bermuda	2
Martinique	2
Monaco	2
Niue	2
Papua New Guinea	2
Southwest Africa	2
Burundi	1
Cape Verde	1
Equatorial Guinea	1
French Guiana	1
French Polynesia	1
Guadeloupe	1
Gaza Strip	1

**Countries of Origin for 24,504 F-1 Students Assigned Social Security Numbers (July 15 – September 30, 2005)**

<i>Country Name</i>	<i>Number of F-1 Students</i>
Kiribati	1
Madagascar	1
Mayotte	1
Malta	1
Vanuatu	1
Spratly Islands	1
Seychelles	1
Somalia	1
Turks and Caicos Islands	1
Tonga	1
Vatican City	1

**Countries of Origin for 250 F-1 Students in the Office of the  
Inspector General Sample  
(July 15 – September 30, 2005)**

Country	Number of Students
India	73
China	40
Korea	12
Japan	8
Nepal	7
Turkey	7
Canada	6
Kenya	6
Poland	6
Taiwan	6
Vietnam	5
Brazil	4
France	4
Mexico	4
Germany	3
Nigeria	3
Romania	3
United Kingdom	3
Russia	3
Cambodia	2
Indonesia	2
Italy	2
Jamaica	2
Malaysia	2
Tanzania	2
Trinidad and Tobago	2
Argentina	1
Australia	1
Belgian Congo	1
Bolivia	1
Brunei	1
Cameroon	1
Chile	1
Columbia	1
Denmark	1

**Countries of Origin for 250 F-1 Students in the Office of the  
Inspector General Sample  
(July 15 – September 30, 2005)**

Country	Number of Students
Ecuador	1
Gambia	1
Greece	1
Guyana	1
Hong Kong	1
Hungary	1
Netherlands	1
New Zealand	1
Nicaragua	1
Pakistan	1
Philippines	1
Portugal	1
Singapore	1
St. Christopher-Nevis-Anguilla	1
St. Lucia	1
Thailand	1
Uganda	1
Yugoslavia	1
Armenia	1
Bosnia	1
Myanmar	1
Czeck Republic	1
Croatia	1
Lebanon	1

### Scope and Methodology

To address concerns expressed by Senate Committee on Homeland Security and Governmental Affairs staff, which were related to the potential that some educational institutions are providing students with work authorization letters and documentation of employment even though these institutions do not intend to hire the students for on-campus employment, we:

- Reviewed the Social Security Administration's (SSA) regulations governing the issuance of Social Security numbers (SSN) to foreign academic students in the F-1 classification.
- Identified 24,504 F-1 students assigned SSNs from July 15 through September 30, 2005. We randomly selected 250 students and verified enrollment and employment status with their respective schools. For each student in the sample, we requested their employment start date and a brief job description.
- Requested information from regional offices to gain a perspective on field offices' experiences with educational institutions providing work authorization letters and/or suspect evidence of actual or offered on-campus employment to improperly facilitate F-1 students' attainment of SSNs.
- Interviewed selected school, SSA field office and SSA Office of the Inspector General, Office of Investigations, representatives to clarify information regarding educational institutions providing work authorization evidence to facilitate F-1 students' attainment of SSNs.

Applications for SSNs are processed in the field offices, which are under the Deputy Commissioner for Operations. We performed our work in Birmingham, Alabama. The data used for this audit were sufficiently reliable to meet our audit objective. We limited our review of internal controls over enumeration of F-1 students to obtaining an understanding of the regulations and policies governing the process and performing the steps identified above. We conducted our audit from December 2005 through March 2006 in accordance with generally accepted government auditing standards.

Tables 1 and 2 show our sample size, results, and appraisals for F-1 students who were enrolled in school and accepted or were promised on campus employment and F-1 students who were enrolled in school and were not employed or offered employment on campus.

**Table 1: Results and Projection for Students with Employment or Promised Employment**

<b>SAMPLE ATTRIBUTE APPRAISAL</b>	
Total population of original SSNs assigned to F-1 students from July 15 through September 30, 2005	24,504
Sample Size	250
<b>SAMPLE ATTRIBUTE APPRAISAL</b>	
Number of instances in sample where F-1 students were enrolled and accepted or were promised on campus employment	240
Estimate of instances in population where F-1 students were enrolled and accepted or were promised on campus employment	23,524
Projection lower limit	22,868
Projection upper limit	23,966

Projections made at the 90-percent confidence level.

**Table 2: Results and Projection for Students Who Were Not Employed**

<b>SAMPLE ATTRIBUTE APPRAISAL</b>	
Total population of original SSNs assigned to F-1 students from July 15 through September 30, 2005	24,504
Sample Size	250
<b>SAMPLE ATTRIBUTE APPRAISAL</b>	
Number of instances in sample where F-1 students were enrolled but were not employed on campus	9
Estimate of instances in population where F-1 students were enrolled but were not employed or offered employment on campus	882
Projection lower limit	465
Projection upper limit	1,515

Projections made at the 90-percent confidence level.

## **DISTRIBUTION SCHEDULE**

Commissioner of Social Security

Office of Management and Budget, Income Maintenance Branch

Chairman and Ranking Member, Committee on Ways and Means

Chief of Staff, Committee on Ways and Means

Chairman and Ranking Minority Member, Subcommittee on Social Security

Majority and Minority Staff Director, Subcommittee on Social Security

Chairman and Ranking Minority Member, Subcommittee on Human Resources

Chairman and Ranking Minority Member, Committee on Budget, House of Representatives

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

Chairman and Ranking Minority Member, Committee on Governmental Affairs

Chairman and Ranking Minority Member, Committee on Appropriations, House of Representatives

Chairman and Ranking Minority, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, House of Representatives

Chairman and Ranking Minority Member, Committee on Appropriations, U.S. Senate

Chairman and Ranking Minority Member, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, U.S. Senate

Chairman and Ranking Minority Member, Committee on Finance

Chairman and Ranking Minority Member, Subcommittee on Social Security and Family Policy

Chairman and Ranking Minority Member, Senate Special Committee on Aging

Social Security Advisory Board

# **Overview of the Office of the Inspector General**

The Office of the Inspector General (OIG) is comprised of our Office of Investigations (OI), Office of Audit (OA), Office of the Chief Counsel to the Inspector General (OCCIG), and Office of Resource Management (ORM). To ensure compliance with policies and procedures, internal controls, and professional standards, we also have a comprehensive Professional Responsibility and Quality Assurance program.

## **Office of Audit**

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

## **Office of Investigations**

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

## **Office of the Chief Counsel to the Inspector General**

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

## **Office of Resource Management**

ORM supports OIG by providing information resource management and systems security. ORM also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, ORM is the focal point for OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act of 1993.