

126333
30570

BY THE COMPTROLLER GENERAL

Report To The Congress

OF THE UNITED STATES

Eligibility Verification And Privacy In Federal Benefit Programs: A Delicate Balance

Federal outlays for benefit programs in fiscal year 1985 are estimated to be more than \$400 billion--about 45 percent of the national budget.

Inadequate verification of clients' eligibility for these programs contributes to erroneous payments of several billion dollars annually. Efforts continue to reduce these errors and strengthen program integrity, but such efforts raise concerns about excessive intrusions into individual privacy.

Balancing the competing goals of improving eligibility verification and protecting individual privacy is both difficult and controversial. This report presents issues that GAO believes the Congress and others should consider in properly balancing the two goals.



031353/126333

GAO/HRD-85-22
MARCH 1, 1985

Request for copies of GAO reports should be sent to:

**U.S. General Accounting Office
Document Handling and Information
Services Facility
P.O. Box 6015
Gaithersburg, Md. 20760**

Telephone (202) 275-6241

The first five copies of individual reports are free of charge. Additional copies of bound audit reports are \$3.25 each. Additional copies of unbound report (i.e., letter reports) and most other publications are \$1.00 each. There will be a 25% discount on all orders for 100 or more copies mailed to a single address. Sales orders must be prepaid on a cash, check, or money order basis. Check should be made out to the "Superintendent of Documents".



COMPTROLLER GENERAL OF THE UNITED STATES

WASHINGTON D.C. 20548

B-208484

To the President of the Senate and the
Speaker of the House of Representatives

About 3 in 10 Americans, according to the latest available statistics, receive benefits from government needs- or insurance-based programs. The federal share of these benefits is more than \$400 billion a year, or about 45 percent of the national budget.

Erroneous payments in these benefit programs total several billion dollars a year. Many erroneous payments result from eligibility decisions that are based on incorrect information, which often stems from inadequate verification. The federal government must, therefore, take a hard look at how information used to justify client eligibility is verified.

Because nearly every American will sooner or later apply for benefits of one kind or another--and undergo the questioning and data searches related to eligibility decisions--any look at eligibility verification should consider how such efforts do or could infringe on individual privacy.

Over the past 9 years we have issued 148 reports relating to either eligibility verification or privacy issues. From this experience, augmented by a recent review, we have identified in this report 13 issues that decision makers in the Congress, the executive branch, and state and local governments should consider in improving internal controls, efficiency, and privacy protection in federal benefit programs.

To guard the public purse without violating personal privacy is to seek a delicate balance. This report represents our effort to further the understanding necessary to achieve that balance.

We are sending copies of this report to numerous congressional committees, the Office of Management and Budget, the federal departments and agencies involved in administering benefit programs, state governors and legislative bodies, and other interested parties.

Charles A. Bowsher

Comptroller General
of the United States



D I G E S T

About 3 in 10 Americans, according to the latest published Census Bureau statistics, receive benefits from government needs- or insurance-based programs. Federal outlays for these benefits, currently totaling more than \$400 billion a year, are projected to remain at about 45 percent of total annual national budget outlays through fiscal year 1987.

For anyone who has worked, almost certainly many of his or her tax dollars have gone to underwrite benefits from the federally funded benefit programs. These programs, numbering at least 136, encompass insurance-based programs like Social Security and needs-based programs like Aid to Families with Dependent Children. (See app. II.) In addition to the federal funding, states also spend billions to support many of these programs.

NEED FOR VERIFICATION

Benefit payments are based on eligibility decisions, which are in turn based on information about individuals. Not surprisingly, incorrect information can cause erroneous decisions and sometimes the loss of public funds. So, validating the information becomes very important. To insure proper eligibility decisions, the information must be accurate, complete, and current. That is the purpose of eligibility verification.

What is adequate verification?

Adequate verification is reasonable assurance that benefits are being paid to the right clients in the right amounts. However, to what extent and at what cost should information be verified to attain such reasonable assurance?

Some of the considerations that must be weighed are: (1) the concept of people's honesty, (2) the obligation of people requesting benefits from the government to provide accurate and complete information, (3) the role of government in people's daily lives, (4) the government's need to find economies in spending taxpayer dollars, (5) the willingness of program managers to experiment with different verification methods, (6) the government's need to help more people with limited resources, and (7) the government's willingness to protect the people's privacy.

NEED FOR PRIVACY PROTECTION

Besides being taxpayers and thus underwriters of these programs, most individuals also have been, are, or will be clients--persons receiving or seeking to receive benefits from one or more of these programs. That is almost inescapable, unless one manages to go through life without the need for a pension or health plan and avoids hard times that would necessitate requesting some sort of federal assistance.

As program clients, individuals will be asked to reveal information about themselves that they may feel is private. It may deal with such things as sources of income or the emotional health of a child that requires certain medical care.

Once this information has been gathered, people are vulnerable to it being distorted, lost, or used for unwanted purposes. Finally, misinformation from other parties may be used to support a decision that individuals are ineligible for benefits.

Most people cherish their right to privacy--the right to control what others know about their lives. However, when the divulging of personal information is a condition of receiving government benefits, people have to give up some of this control. The responsibility for protecting the information--and thus the individual's privacy--then shifts to the agency collecting the information.

What is privacy protection?

In the context of this report, privacy protection means that (1) no unnecessary or irrelevant information is collected or maintained; (2) information given to agencies in good faith is not misused or disclosed in an unwarranted fashion; (3) the information is kept accurate, current, and safeguarded from access by those not authorized to have it; and (4) agencies inform individuals about the information they maintain and their information management practices. This report concentrates on that aspect of privacy related to information, but it touches on physical and psychological aspects--physical in the sense of requiring home visits by governmental agencies, psychological in the sense of possibly intimidating recipients by asking for certain data.

Because they are not easily articulated and have no well-defined constituency, privacy considerations may be overlooked. There is, however, increasing public concern about personal privacy in the computer age. A 1983 Louis Harris poll, for example, revealed that 77 percent of the American public were at least somewhat concerned about threats to their personal privacy--up 13 percentage points from 5 years earlier.

And that concern is peculiarly appropriate for benefit program clients. For, it is in just this situation--when people are most willing to open part of their lives to scrutiny by strangers--that government, in providing a service, may do people a disservice.

THE ISSUES

An appropriate amount of relevant data, checked in the most effective and efficient manner, without unduly intruding into client privacy--this is the goal the eligibility verification process should seek. If the process is to reach this goal, various issues that do--or could--affect the process must be understood and dealt with. Thirteen such issues make up the bulk of this report. Presented here in capsule form, they are discussed in detail beginning on page 5. Each issue is assigned to one of three areas--verification techniques, verification information, and privacy protection. However,

all issues are interrelated because decisions in one area may affect the other areas as well. (See figure 1, p. 3.)

ISSUES RELATED TO VERIFICATION TECHNIQUES

Uniform procedures:

Possible or not?

There is overlap in federal program verification efforts. Also, some programs are better at verifying than others. If common agreement could be obtained on what data provided by clients should be verified, what data should be used for verification, who should do what, and what the formal terminology should be, then duplicative functions might be avoided and the best methods could be shared. But do diverse local laws, traditional practices, differences in benefits, and different client profiles make uniform procedures no more than an interesting idea? (See pp. 5 to 8.)

Verification techniques:

How should they be selected?

Verification can range from contacting a bank to corroborate funds a claimant has reported to comparing reported incomes of 10,000 beneficiaries in one computer against unemployment benefits of 100,000 payees in another. Verification can be accomplished by a telephone call or a home visit. How does a program manager choose the most appropriate method--on the basis of cost, fraud or abuse deterrence, or least privacy intrusion? (See pp. 8 to 10.)

Computer matching:

Indispensable or uncontrollable?

A reel of data on magnetic tape spins against its counterpart. Over the last decade computer matching has identified many ineligibles and millions of dollars in overpayments in benefit programs. Some discrepancies indicate possible fraud, waste, or abuse, but if follow-up actions are inadequate, eligible clients may be dropped from benefit rolls without being given a chance to explain. Moreover, it could be costly to an agency as well as clients when legal action is necessary to restore benefits to unjustly terminated clients. Computer matching is increasing.

How good is it? What controls should it have? Who should enforce the controls? (See pp. 10 to 13.)

Front-end verification:
The solution?

It is preferable to prevent an ineligible person from getting on benefit rolls than to remove an ineligible after benefits have been paid. But, in the past, because verification took more time than was allowed by a number of programs--which had to accept or reject applicants within a specified period--verification was largely remedial. Now, because computer matching in the preenrollment stage makes preventive verification more feasible, more programs are using it. But, while it may reduce privacy intrusions, concerns remain: Are other verification techniques sometimes more appropriate? Who should set guidelines for this technique? Who should oversee its use? (See pp. 13 to 15.)

Selective verification:
Is error-prone profiling efficient and fair?

Program managers, through statistical analyses, know some clients are more likely to give false information than others. Such clients are identifiable because they exhibit certain characteristics. Limited resources may make comprehensive verification of all clients impractical--and thus may dictate some selection process to determine who will be checked. More and more program managers are choosing error-prone profiling to make this selection. This approach seems cost effective. But is it? Also, it may reinforce wrong assumptions about clients and discourage experienced caseworkers from applying their judgment in the verification process. Moreover, what assurances are there that factors used to develop profiles do not violate client privacy or civil rights? (See pp. 15 to 18.)

Quality control:
Should more programs use it?

Agencies use eligibility verification samples to identify unqualified recipients. Quality control samples are used to verify results to see where verification processes can be improved.

Though some federal programs have quality control systems, none has been legislated. The Congress has, however, required that the error rates identified for some programs be used to impose fiscal sanctions on states. Should the Congress uniformly require quality control systems? They do save money, but can intrude more into sampled clients' privacy than normal verification processes. Also, they add to administrative costs. (See pp. 18 to 21.)

ISSUES RELATED TO VERIFICATION INFORMATION

The right data:
Are they available?

There are variations in the reliability of data used to verify. Tax return information on income reported to the government, although somewhat aged, might be given more credence than income information supplied by a client. However, at present, the Congress allows only a few federal programs to use tax information. Should more of this relatively reliable data be made available to verify client-submitted information? What would the privacy effects be if that expansion were allowed? What effect would it have on voluntary tax compliance? (See pp. 22 to 24.)

Centralized data:
Vital resources or not?

Centralization of data does not demand that a type of information be physically grouped, but only that the information be accessible from one place. The Department of Labor is following this principle in developing an interstate network of computerized wage and unemployment information. Without centralizing client data to some extent, such techniques as large-scale computer matching may not be feasible. It is also helpful to centralize in some way the information that will corroborate or contradict the data to be verified. For example, the need for death information has already led to the plan for a national file on persons who have died. Proponents of centralization say it enhances privacy. But can the government adequately safeguard these huge data banks?

And, with so much information quickly available, does centralization move the government too close to the capabilities of George Orwell's "Big Brother"? (See pp. 24 to 26.)

Data links:
Should they be allowed?

Data links are akin to centralization in that they allow easy accumulation and sharing of data. But, whereas in centralization the activity usually involves one agency or program, linking concerns more than one agency. In this issue the questions are: How many and what kinds of data banks--private and/or public--should a program be able to link with? Should Social Security be able to link with a bank? If so, when? How can assurance be provided that only appropriate files are examined? (See pp. 26 to 29.)

Social security number:
Verification key
or skeleton key?

Identifiers such as driver's license, telephone, and credit card numbers can be used to locate or track individuals. No other identifier can compare, however, to the social security number in terms of uniqueness and recognized acceptance. However the social security number could be perceived as government's skeleton key to unlock everyone's closet of private information. Is it, if not by formal definition then by usage, a national identifier? At present, some programs can require clients to reveal their social security numbers, others cannot. Without it, data collection and verification--on and off computer--can be crippled. Also, failure to uniformly acknowledge the number's importance may result in overlooking or deemphasizing the need to purge incorrect and invalid numbers from files. (See pp. 29 to 31.)

ISSUES RELATED TO PRIVACY PROTECTION

The individual:
What rights in
dealing with agencies?

Some demands must be made upon a person who seeks to receive money from a federal program,

particularly if that money is allocated on the basis of need. Yet clients should not be left unprotected and without means to ensure that agencies have accurate information and use it correctly. Suppose the agency collects improper information, or misuses it in eligibility decisions, or simply subverts the process by means of intimidation or harassment. Should the client have recognized rights? If so, what rights? Where recognized rights exist, how could agencies better communicate these rights to clients? (See pp. 32 to 35.)

Data security:
Adequate or not?

The agency that collects information--original document or otherwise--has an obligation to protect it, not just from loss or destruction, but from unauthorized access, duplication, and alteration. With the increase of both computerized record keeping and computer crime, these safeguarding concerns become more important. Are present federal protections--and oversight of them--adequate? (See pp. 35 to 39.)

Privacy policy:
The same for all programs?

Although a variety of observers agree that government policies and laws for protecting personal privacy and data confidentiality could be strengthened, there are sharp disagreements over the best method. Some observers favor extending coverage of the 1974 Privacy Act and other existing laws. Others prefer establishing new guidelines and oversight resources. Any solution adopted will have to deal with such questions as: Should the policy cover all levels of government? How would the policy affect state rights? What would be the cost? Who should oversee policy implementation? (See pp. 39 to 44.)

WHERE DO WE GO FROM HERE?

In looking at eligibility verification and privacy issues, a careful balance needs to be struck between protecting privacy rights and meeting program requirements for verifying data on which eligibility decisions are made. No law or group of laws can solve all the problems of

privacy protection while ensuring that eligibility information is properly verified. Rather, the balance is brought about by the people who implement or are affected by these laws--through their understanding and knowledge of what privacy is and of what must be given up or protected in ensuring the proper awarding of benefits.

Policies adopted to protect privacy or improve verification must be viewed in terms of their impact on both goals or they can work contrary to their intended purpose. For example, if to verify key information caseworkers must access numerous data sources or conduct home visits, because reliable centralized data are not available or cannot be accessed, then the risks of infringing on individual privacy rights may be increased. Centralizing data to ease access, however, is not without both privacy and verification problems. It raises such questions as: How can safeguards be designed to preclude inappropriate access? and How can the data be kept accurate and current?

GAO believes that the Congress, the Office of Management and Budget (OMB), and the federal, state, and local agencies administering the programs need to (1) further explore the issues identified in this report and (2) improve eligibility verification and privacy protection in federal benefit programs. This report can aid in addressing these issues in several ways, as the following suggested uses illustrate.

What can program managers do?

Program managers could overlay the report on their operations to identify which issues apply to their programs and take or suggest appropriate action. For example, they could assess the quality of data now used in verification as well as potential alternative data sources to make sure the best data available are used.

What can OMB do?

OMB, the key executive branch agency that makes policy for federal program management, could use the report to gauge where programs are in reference to the issues discussed and to allow sharing of commonly beneficial knowledge among

benefit programs. For example, OMB could take the lead in government-wide studies of (1) the use of error-prone profiles and (2) the privacy protection rights clients currently have and the rights they should have uniformly among programs.

What can the Congress do?

The Congress could refer to the report whenever it changes laws in ways that might affect eligibility verification and/or privacy protection in federal benefit programs. The report could also be used as a starting point from which further debate in the form of hearings, panels, or less formal research might proceed. For example, the Congress could reexamine current government policies and practices regarding the use of the social security number and ultimately resolve the overriding issue of the number's status as a national identifier. The Congress could also consider whether further study should be made of the need for a national data privacy and confidentiality policy to protect the privacy rights of all federal benefit program clients.

The concluding chapter of this report provides more detail on potential responses to the issues. (See pp. 45 to 49.)

WHAT IS THE LARGER VALUE OF THIS REPORT?

As the preceding examples illustrate, GAO sees this report as raising specific questions and, in some instances, pointing toward possible answers. But the report's larger value may lie in highlighting for decision makers the need to explore and resolve important issues surrounding two often competing interests--eligibility verification and privacy protection--in benefit programs that affect the lives of nearly all Americans and account for nearly half the national budget.

C o n t e n t s

Page

DIGEST

i

CHAPTER

1	INTRODUCTION	1
	Need for verification	1
	Need for privacy protection	1
	Report objective	2
	The issues	2
	Review scope and methodology	4
2	VERIFICATION TECHNIQUES ISSUES	5
	Uniform verification procedures: possible or not?	5
	What should be the criteria for selecting verification techniques?	8
	What is the proper role of computer matching in eligibility verification and to what extent should it be controlled?	10
	What should the policy be on computerized front-end verification?	13
	Error-prone profiles: How good?	15
	Which programs should have a quality control system?	18
3	VERIFICATION INFORMATION ISSUES	22
	Are the right data available and being used to verify client-provided information?	22
	To what extent should data be centralized?	24
	To what extent and with what safeguards should client data be linked with other data?	26
	What should be the policy on social security number use and how can faulty numbers be minimized?	29
4	PRIVACY PROTECTION ISSUES	32
	What rights should a client have and how should they be safeguarded?	32
	What constitutes adequate data security?	35
	Should there be a national data privacy and confidentiality policy for federal benefit programs?	39
5	CONCLUDING THOUGHTS ON THE ISSUES: WHERE DO WE GO FROM HERE?	45
	The "delicate balance"	45
	Who should address the issues?	45
	What can program managers do?	46
	What can OMB do?	46
	What can the Congress do?	46
	What is the larger value of this report?	49

	<u>Page</u>
APPENDIX	
I	Glossary 50
II	Listing of federal needs-based and insurance-based benefit programs, by type of benefit 53
III	Brief descriptions of selected federal needs-based and insurance-based benefit programs included in GAO's study 57
IV	GAO reports relating to eligibility verification from 1976 to 1984 66
V	GAO reports relating to privacy from 1976 to 1984 74
VI	Bibliography of eligibility verification sources 79
VII	Bibliography of privacy, computer matching, and computer security sources 84

ILLUSTRATIONS

Figure

1	The eligibility verification process 3
2	Examples of methods used to verify data provided by clients in some programs 6
3	General sequence of error-prone profile procedures 16
4	Error-prone profiles: pros and cons 17
5	AFDC erroneous payment rate reductions 19
6	Composite of data linkages through computer matches by AFDC programs in various states 28
7	Layers of the data security environment 36
8	Examples of potential responses to issues 48

ABBREVIATIONS

AFDC Aid to Families with Dependent Children
GAO General Accounting Office
HHS Department of Health and Human Services
HUD Department of Housing and Urban Development
OMB Office of Management and Budget
SSA Social Security Administration
SSI Supplemental Security Income
SSN social security number
VA Veterans Administration



CHAPTER 1

INTRODUCTION

NEED FOR VERIFICATION

Erroneous payments in federally funded benefit programs total several billion dollars a year. Benefit payments are based on eligibility decisions, which are in turn based on information about individuals. Thus, the validation of information becomes very important. To insure proper eligibility decisions, the information must be accurate, complete, and current. That is the purpose of eligibility verification.

Adequate verification may be defined as reasonable assurance that benefits are being paid to the right clients in the right amounts. The question is, however: To what extent and at what cost should information be verified?

The programs vary enormously in what extent of verification is deemed sufficient, how verification is carried out, and, indeed, what "verification" means.

NEED FOR PRIVACY PROTECTION

In the context of this report, privacy protection means that (1) no unnecessary or irrelevant information is collected or maintained; (2) information given to agencies in good faith is not misused or disclosed in an unwarranted fashion; (3) the information is kept accurate, current, and safeguarded from access by those not authorized to have it; and (4) agencies inform individuals about the information they maintain and their information management practices.

Most people cherish the right to control what other people know about their lives--in other words, their right to privacy. When the divulging of personal information is a condition of receiving benefits, people have to give up some of this control. The responsibility for protecting the information--and thus the individual's privacy--then shifts to the agency collecting the information.

REPORT OBJECTIVE

This report discusses issues that decision makers in the Congress, the executive branch, and state and local governments should consider in improving internal controls, efficiency, and privacy protection in federal benefit programs.

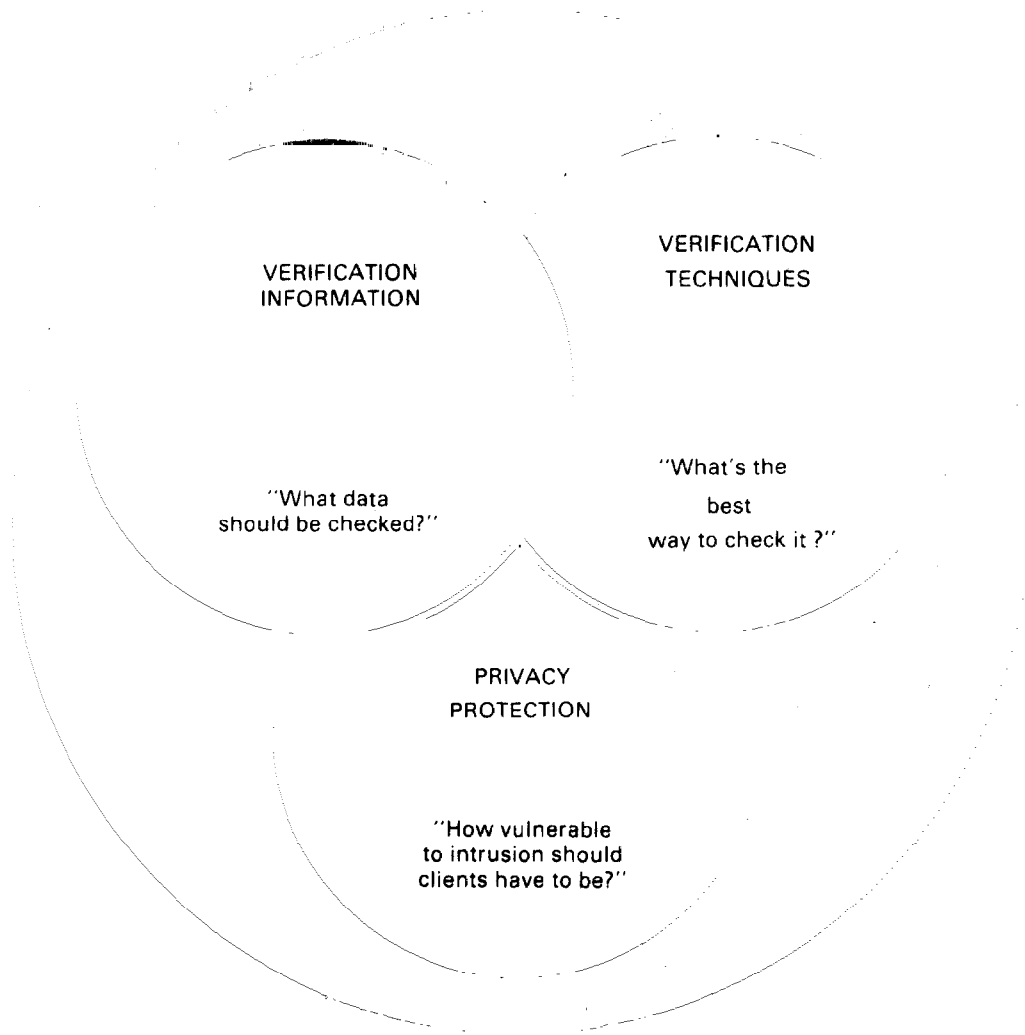
To guard the public purse without violating personal privacy is to seek a delicate balance. This report represents GAO's effort to further the understanding necessary to achieve that balance.

THE ISSUES

An appropriate amount of relevant data, checked in the most effective and efficient manner, without unduly intruding on client privacy--this is the goal the eligibility verification process should seek. If the process is to reach this goal, various issues that do--or could--affect the process must be understood and dealt with. Thirteen such issues have been identified and make up the bulk of this report. The issues are presented in three chapters--verification techniques issues, verification information issues, and privacy protection issues--but they are interrelated because decisions in one area may affect the others. (See figure 1 on the next page.)

Figure 1

THE ELIGIBILITY VERIFICATION PROCESS



Within the ELIGIBILITY VERIFICATION PROCESS (the large circle) how any of the three areas of concern (the small circles) is dealt with may affect not only the approach and results of the process but also the other areas of concern. For example, a decision within VERIFICATION INFORMATION to check all available data could mean that the choice of which VERIFICATION TECHNIQUE to use may be a home visit rather than a telephone call or letter. That choice, insofar as PRIVACY PROTECTION is concerned, may require the client to endure a more intrusive verification. Likewise, a decision arising from a concern for privacy may dictate that only a minimum of data be checked and that a checking by mail must suffice.

REVIEW SCOPE AND METHODOLOGY

Over the past 9 years GAO has issued 148 reports relating to either eligibility verification in federal programs or protection of individual privacy. (See apps. IV and V for lists of the reports.) In 1983 GAO began to study both areas. To do this, GAO reviewed the findings of its earlier reports. GAO also looked at how federal and state agencies, administering 17 federally funded benefit programs, verify eligibility and protect privacy. (See app. III for descriptions of the 17 programs and the administering agencies.) GAO reviewed literature on privacy, computer matching, and computer security and studies of verification in various benefit programs. (See apps. VI and VII for bibliographies of source documents studied.) Finally, GAO conferred with experts in both areas of interest, some of whom also commented on a draft of this report.

CHAPTER 2

VERIFICATION TECHNIQUES ISSUES

UNIFORM VERIFICATION PROCEDURES: POSSIBLE OR NOT?

Similar eligibility factors across programs are verified differently. Verification of client-provided data can range from all to none. Each caseworker at each office could be verifying all eligibility factors for each client in a different way. Should the same factors be verified in the same way across and within programs?

Problems With Existing Verification Procedures

A 1980 interagency project to simplify eligibility policies in major public assistance programs identified a number of confusing aspects of the verification process. For example:

- An item to be verified in one program did not have to be verified in other programs.
- The same information was often verified more than once because no program would accept other programs' verification.
- Different programs often required different methods of verifying the same items.
- In some programs, decisions on what was to be verified, and how, were often left to the caseworker; in other programs, the caseworker had little or no say.

The results of our fieldwork confirmed some of the problems identified in the interagency study. As an illustration, figure 2 on the next page provides examples of the variations (and some similarities) in methods used to verify eligibility factors among programs. The chart is not all inclusive for each program but merely shows examples of methods for selected locations.

Figure 2

**EXAMPLES OF METHODS USED TO VERIFY DATA PROVIDED
BY CLIENTS IN SOME PROGRAMS**

PROGRAMS	DATA TO BE VERIFIED			
	Name	Social Security Number (SSN)	Age/Date Of Birth	Earned Income
Needs-Based				
MEDICAID	Compare to picture ID	Compare to Social Security card	Compare to birth certificate	Compare to state or SSA data or obtain employment form
FOOD STAMP	Compare to picture ID	Compare to Social Security card	Compare to birth certificate	Compare to state or SSA data or obtain employment form
SUPPLEMENTAL SECURITY INCOME	Compare to ID	Compare to Social Security card	Compare to birth certificate	Accept client declaration
AID TO FAMILIES WITH DEPENDENT CHILDREN	Compare to picture ID	Compare to Social Security card	Compare to birth certificate	Compare to state or SSA data or obtain employment form
SECTION 8 HOUSING	Compare to driver's license or birth certificate	Compare to Social Security card	Compare to driver's license and/or birth certificate	Compare to employer's wage form
VETERANS PENSION	Accept client declaration	Compare to SSA data	Accept client declaration	Accept client declaration
PELL GRANTS	Compare to school's data bases	Compare to school's data bases	Not verified	Compare to client provided tax form (1040)
Insurance-Based				
SOCIAL SECURITY	Compare to Social Security card	Compare to Social Security card	Compare to driver's license, birth certificate, etc.	Compare to employer earnings statement or client provided tax form (1040)
CIVIL SERVICE RETIREMENT	Compare to official personnel file	Compare to official personnel file	Compare to official personnel file	Compare to official personnel file
STATE UNEMPLOYMENT COMPENSATION	Compare to Social Security card, driver's license, etc.	Compare to SS card and employer's wage record	N/A	Compare to employer earnings statement

Complicating Factors

The interagency study showed that among the factors affecting the complexity and efficiency of verification are:

- Treatment of income and resources: The definitions of income and resources differ among programs, as do the elements included in income and resource computations. The differences contribute to apparently similar items being considered or verified in different ways.
- State and local requirements: State and local agencies add their own verification requirements to federal programs, thus adding to the caseworkers' burden.
- Administrative elements: The following elements of verification vary among programs and offices: (1) who accepts the client's application, (2) who verifies the client-provided data, (3) how well the personnel do their work, (4) the size of staff relative to the number of clients regularly visiting the office, (5) the number of clerical and other support personnel, and (6) the availability of adequate computers to process applications and aid in verifying client data.
- Frequency of verification requirements: Citizenship and age, for example, may not need to be verified more than once. Income and family composition are subject to frequent change and must be monitored closely.

Uniform Definitions And Procedures: Are They Necessary, Practical, Or Possible?

In administering the various benefit programs fairly and consistently for taxpayer and client alike, are uniform procedures for verifying eligibility factors necessary, practical, or possible? Is it fair to subject clients to repeated and possibly highly intrusive verification processes when verifying certain factors in some programs but not in others? Likewise, is it fair to the taxpayer for caseworkers to accept clients as being eligible without verifying that program requirements are met?

Many clients receive benefits from several programs. In some cases they provide the same data for each program, yet each program independently verifies the accuracy of the data and decides whether the client meets the program's eligibility requirements. If one agency would accept the verification performed by another, several types of savings could result: (1) agency savings--less administrative time and fewer resources needed; (2) client savings--less time spent at the agency, less travel costs getting to and from the agency, less likelihood of client harassment, and fewer client/caseworker confrontations; and (3) taxpayer savings--reduced administrative costs.

From the interagency eligibility simplification project and our work, we realize that the various programs' factors are not always defined the same way. But, for those that are, the appropriate agencies could coordinate verification efforts within and among programs to avoid duplicate verification procedures for the same clients. Also, the executive agencies and the Congress could consider defining like factors the same way across programs.

WHAT SHOULD BE THE CRITERIA FOR SELECTING VERIFICATION TECHNIQUES?

Various techniques, such as computer matching and home visits, are used to verify benefit program eligibility. In selecting a technique and determining when and how to use it, should the controlling criterion be (a) cost benefits or cost effectiveness, (b) deterrents to fraud and abuse, (c) raised confidence level in program integrity, or (d) all of these, and perhaps others?

Emphasis On Cost Effectiveness

Cost effectiveness has been emphasized as an important consideration for verification techniques. In these assertions, cost effectiveness has often been used as a synonym for cost benefits. Generally, however, cost effectiveness is determined by comparing the costs of techniques to achieve a benefit, although the benefit may not be easily expressed in monetary terms. Cost benefit is determined by comparing the monetary value of the benefits of an effort (in this case a verification technique) with the dollar costs of the effort.

Cost Effectiveness Concerns Remain Unaddressed

Concerns have been expressed about the cost effectiveness of verification techniques, particularly computer matching. Sometimes it is unclear whether these concerns are expressed in terms of cost effectiveness or cost benefits. In any case, the answers to the concerns to date have been unsatisfactory, due in part to a lack of data and of a well-defined methodology needed to demonstrate cost effectiveness or cost benefits. Little effort has been made to accumulate the data needed, and only recently efforts have begun to develop a methodology, but those efforts are focused primarily on computer matching. Should other techniques, such as front-end verification and error-prone profiles (see pp. 13 to 18), also receive such research attention?

When queried, respondents, including GAO, the Department of Health and Human Services (HHS) Inspector General, and state agencies, generally cite erroneous payments identified through verification--and some recoveries--as evidence of the "cost effectiveness" of verification techniques. However, in many cases the actual benefits cannot be determined because complete data are lacking on the cost of verification processes (from the point of obtaining data through completion of the follow-up process).

Nonquantifiable Criteria

Another question raised is: Should a verification technique that has proven cost beneficial be discontinued when it no longer reaps quantifiable benefits or be continued because of nonquantifiable benefits? For example, wage data reported by employers for unemployment or tax administration purposes can be used in some programs to identify erroneous payments caused by earnings incorrectly reported by program clients. In addition, this verification technique can deter fraud and abuse and can assure program managers, the Congress, and the public that the programs are serving eligible people. Should this verification continue, even after few, if any, erroneous payments are identified?

Privacy As A Criterion

To what extent should the impact on personal privacy be considered as a criterion in selecting verification techniques? For example, computer matching has

the potential for intruding into the privacy of many more people than does a home visit, yet some people consider the computer match to be less intrusive on individual client privacy than home visits. In such visits, the caseworker enters one of the most important areas of an individual's privacy--the sanctity of the home.

What Is Needed?

During 1982 Senate hearings, the cost effectiveness of computer matching was discussed at some length.¹ More recently, a House subcommittee asked GAO to develop a methodology for determining the cost effectiveness of matching.² Similar efforts may be needed to provide the capability for determining the worth of other verification techniques, such as front-end verification and error-prone profiles.

WHAT IS THE PROPER ROLE OF COMPUTER MATCHING IN ELIGIBILITY VERIFICATION AND TO WHAT EXTENT SHOULD IT BE CONTROLLED?

Computer Matching Can Save Millions Of Dollars . . .

Computer matching--the electronic comparison of two or more sets of data to identify discrepancies indicative of fraud, waste, and abuse--has proven an effective, but controversial technique for verifying client eligibility. Over the last decade, this technique has uncovered inaccurate data in many programs and millions of dollars in overpayments. Many Inspectors General, program managers, and others view computer matching as a viable way to improve the integrity of payment programs.

¹Senate Committee on Governmental Affairs, Subcommittee on Oversight of Government Management. Oversight of Computer Matching to Detect Fraud and Mismanagement in Government Programs. Hearings. 97th Cong., 2nd sess. Washington, D.C.: GPO, 1983.

²House Committee on Government Operations, Subcommittee on Intergovernmental Relations and Human Resources.

. . . But It Raises Privacy Fears

Many people fear that computer matching endangers personal freedoms and that federal and state governments may not be able to control the use of data in their computer banks. A September 1983 Louis Harris poll showed that over the previous decade the portion of the public that viewed computers as a threat to personal privacy increased from 38 to 51 percent. As federal benefit programs do more matching, agencies may need to improve control of data use to better protect personal privacy.

What Makes Matching Important?

In many programs information essential to making benefit payments is in computerized data bases--as are much of the data needed to verify this information. Common examples include information on wages, interest and dividend income, payments from other benefit programs, births, deaths, marriages, and divorces (access to some of these data bases may be restricted). Also, such programs as Aid to Families with Dependent Children (AFDC), Food Stamp, Supplemental Security Income (SSI), and Veterans Pension require that benefit amounts be reduced by the amount of benefits clients receive from other federal programs.³ Computer matching can be used to identify offsetting benefits not accurately reported by clients.

How Extensive Is Matching And Is It Cost Effective?

Before 1976, only two benefit program-related federal computer matching projects were conducted. However, recent inventories of federal and state agencies' computer matching projects show that federal agencies had initiated 126 benefit-related matches, 38 of which were recurring as of May 1984. State agencies, as of October 1982, had initiated more than 1,200 matching projects, most of them recurring. Should this growth be allowed to continue unchecked?

³See app. III for descriptions of these programs.

It has been assumed that because matches can sift through massive data files quickly, they are cost effective. But are they? What constitutes a cost-effective match? GAO is conducting a study to develop a methodology for evaluating the cost effectiveness of computer matching.

Does Matching Endanger Due Process Rights?

Due process gives clients the right to challenge and refute agency information before final decisions are made to deny or reduce benefits. Concerns about due process in computer matching have related primarily to inadequate follow-up investigation of the results of matching. In these instances, due process rules reportedly were not observed during follow-up investigations.

The 1984 Deficit Reduction Act, which allows some matching of tax information with client data to verify eligibility, recognizes the importance of due process and prescribes a detailed set of due process rules to protect clients. Involving clients before final decisions may benefit both agencies and clients by avoiding formal appeals and perhaps litigation, which are costly and time consuming for both parties.

Is Matching Oversight Adequate?

There is considerable concern in the Congress, and among beneficiary advocacy groups and others, about existing controls and oversight to assure that computer matching is cost effective and does not abridge personal privacy and due process rights.

The Office of Management and Budget (OMB) has issued matching guidelines applicable to all federal agencies under the Privacy Act who are doing matches or providing data for nonfederal matches and a checklist to help agencies comply with the guidelines. OMB also has issued a "Model Control System and Resource Document" for computer matching. Moreover, HHS' Inspector General has published guidelines for state managers of the AFDC, Food Stamp, and Medicaid⁴ programs to aid in decisions on state matches. However, existing federal guidance appears to lack an effective compliance enforcement mechanism.

⁴See app. III for a description of this program.

OMB has general oversight responsibility, but federal and state agencies appear to have considerable latitude in implementing matching guidance. Is there adequate oversight of those who conduct computer matching projects?

Importance Of Adequate Controls

In the area of eligibility verification, probably no issue is more important than computer matching. Its potential for saving public money is rivaled only by its potential for infringing on personal privacy. Currently, federal and state governments have difficulty controlling information in their data banks. If federal and state agencies cannot achieve acceptable levels of program integrity without matching, it is important that a proper balance between privacy rights and matching be reached.

WHAT SHOULD THE POLICY BE ON COMPUTERIZED FRONT-END VERIFICATION?

Computerized front-end verification may be defined as verifying clients' application data through computer matching before benefits are provided. Such verification seeks to prevent enrolling of ineligible.

More States Doing Front-End Matching

Historically, most verification using computer matching has been done after clients received benefits. However, there is a trend toward more front-end matching. In March 1983 the President's Council on Integrity and Efficiency published an inventory of computer matching done by the states for selected programs, including AFDC, Food Stamp, and Medicaid. The inventory showed 14 states doing some front-end matching. A follow-up Council survey in 1984 showed that the number of states using front-end matching had doubled. Moreover, in fiscal year 1985 the Department of Labor's Unemployment Compensation program plans to test the effectiveness of its newly developed front-end matching model.

Erroneous Payments Can Be Avoided

Front-end matching can avoid significant erroneous payments. New York officials estimated that they

avoided over \$27.5 million in unnecessary program costs in 1983 when their system of matching tax records with welfare applications to verify income accuracy was fully implemented statewide. Arkansas has saved an estimated \$5 million to \$8 million in both the AFDC and Food Stamp programs as a result of front-end matching.

Privacy Protection And Due Process May Be Improved

Some privacy advocates and others believe that front-end matching is less intrusive than later matching and better preserves privacy and due process rights. For example, one advocate believes that matching after people are on the rolls infringes on individual privacy and is unconstitutional because of the "dragnet" effect--matches of two computer tapes containing thousands of individual entries. Another advocate characterized the "dragnet" approach as the "lazy alternative" to front-end verification.

Lack Of Guidelines For Front-End Matching

We are not aware of any federal guidelines for front-end matching. Although OMB has issued guidelines for computer matching, they specifically exclude front-end matching. In a recent report, we said that OMB's matching guidelines are important because compliance with them would help assure uniform adherence to key disclosure provisions of the Privacy Act.⁵ We concluded that the guidelines could be improved by extending their coverage to front-end matching.

Should More Front-End Matching Be Done?

The goal of front-end matching is good--avoid or reduce erroneous payments by keeping ineligible off the benefit rolls. Also, some privacy advocates believe that front-end matching is less intrusive. Nevertheless, it will not end the need for later verification, because clients' circumstances can change while they are receiving benefits. Before this technique is institutionalized government-wide, the following questions should be addressed:

⁵GAO Observations on the Use of Tax Return Information for Verification in Entitlement Programs (GAO/HRD-84-72, June 5, 1984).

- Is front-end matching more effective than the usual verification procedures in detecting ineligibles?
- Is front-end matching cost effective and cost beneficial in terms of (1) avoiding or reducing erroneous payments and (2) eliminating some of the costly verification procedures now used to determine initial eligibility?
- Are the matched data readily available, accurate, complete, and current?
- What eligibility factors should be matched?
- Will front-end matching unduly delay eligible clients' receipt of initial benefits? If so, will costly court actions by affected clients offset the benefits otherwise gained by using this process?

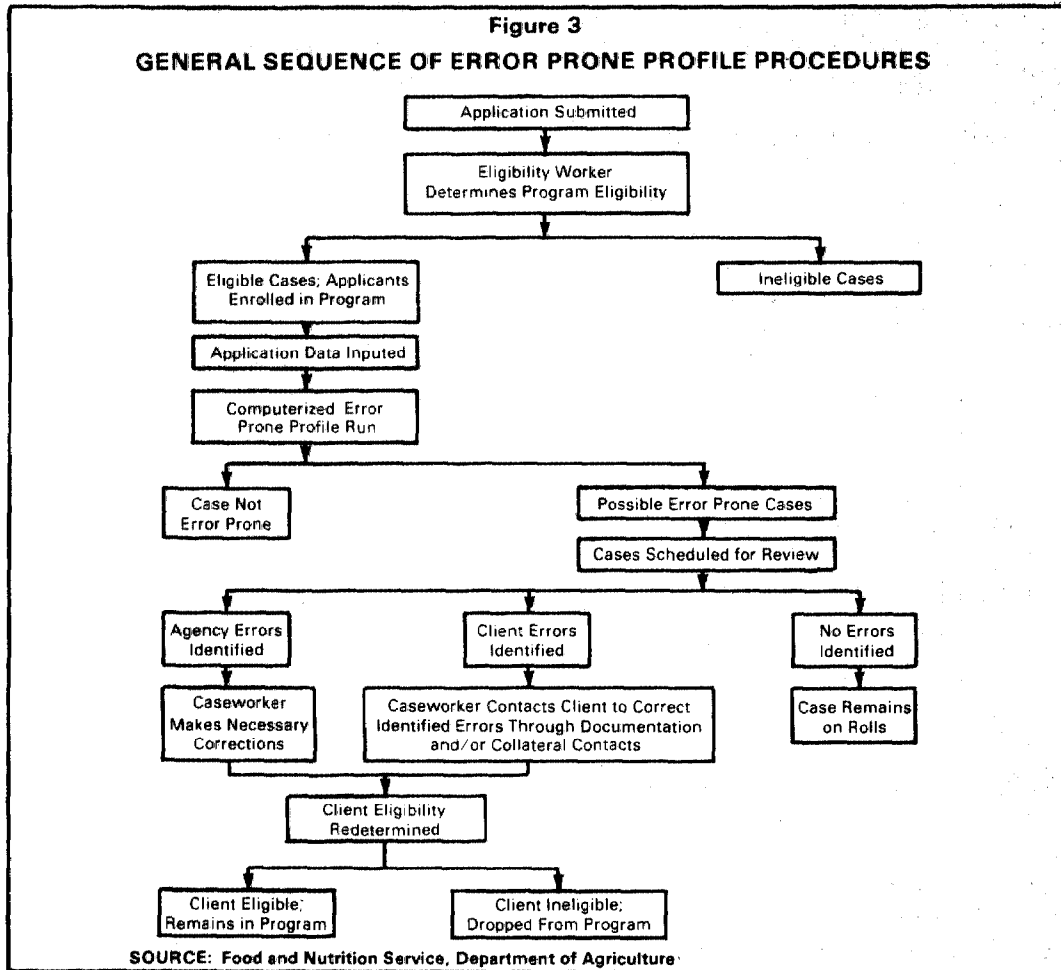
Answers to these questions will require the collection and analysis of much data. With so many states doing front-end matching, some of the effort needed to provide answers may be already underway. Also, the President's Council on Integrity and Efficiency has an ongoing project studying the states' use of computerized front-end matching systems in four programs--AFDC, Food Stamp, Medicaid, and State Unemployment Compensation.⁶ The objectives of this study, scheduled for completion in 1985, include collecting and analyzing states' cost data to implement and operate front-end verification techniques and analyzing associated savings. It may provide some answers to the questions we have raised.

ERROR-PRONE PROFILES: HOW GOOD?

Error-prone profiles are techniques used to identify patterns of client characteristics frequently found in cases involving erroneous payments. Hypothetically, an analysis of erroneous payments might indicate that the lower the client's educational level, the higher the probability of income being reported inaccurately. This characteristic, educational level, could

⁶See app. III for a description of this latter program.

then be used as a profile for selecting applications for more intensive verification. The following chart shows the general sequence of error-prone profile procedures.



Error-prone profiles range from the formal to the informal, or from the statistically supported model with mathematical formulas to determine probability of errors to a subjective judgment. They may be tailored to clients locally or generalized to clients nationwide. The following table lists some of the pros and cons of using error-prone profiles in eligibility verification.

Figure 4 ERROR-PRONE PROFILES:	
PROS	CONS
<ul style="list-style-type: none"> -Are cost effective by allowing agencies to focus verification efforts on cases most likely to have erroneous data. -Reduce the impact of program officials' personal bias and subjective judgment. -Standardize verification efforts and practices program-wide. -Can be used to prevent ineligible clients from entering the program and to detect erroneous payments. 	<ul style="list-style-type: none"> -May reinforce wrong assumptions about clients. -Can be used to justify discriminatory practices. -May restrict experienced caseworkers' judgment in determining which cases need more in-depth review. -Can be used to adversely affect applicant privacy rights. -Can be costly to develop.

Evaluating Profiles

There has been widespread use of error-prone profiling. Before this approach is institutionalized in more programs as part of the verification process, however, it should be subjected to the following questions:

- What are the actual costs and benefits of using profiles?
- Who monitors the validity of factors used to develop profiles?
- What assurances are there that factors used do not violate civil rights?
- What attempts have been made to address the issue of stereotyping people through profiling?

- Can existing systems adequately monitor development and use of profiles?
- How do profiles affect client privacy?
- Is the case management experience of program officials being unjustifiably sacrificed for the standardized practice prescribed by profiles?
- Does use of profiles lower program officials' morale by replacing human involvement in decision-making with a formula approach?
- Would use of profiles release program officials from the responsibility of ensuring that adequate verifications are performed?

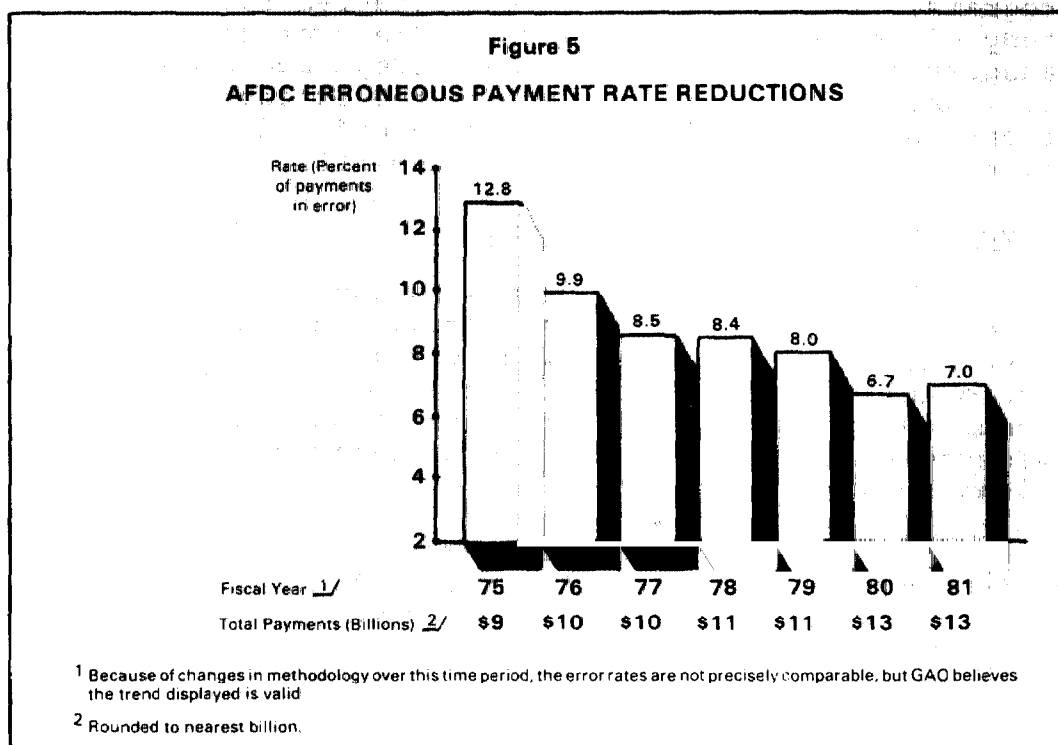
In short, the concept of error-prone profiling--concentration of cases verified in depth to those most likely to contain errors--is good. Answers to these questions would help determine how good.

WHICH PROGRAMS SHOULD HAVE A QUALITY CONTROL SYSTEM?

Quality control is a tool agencies can use to sample periodically the adequacy of verification and benefit computations. The results can be used to correct verification deficiencies and to improve processes to reduce erroneous payments. In some programs the results also have been used to sanction states whose payment errors exceeded specified limits.

Quality Control Helps Reduce Erroneous Payments

Quality control has been an effective tool for reducing erroneous payments in some programs. For example, the AFDC program, a forerunner in adopting quality control, has shown significant savings, as the following chart demonstrates.



Much of these reductions has been attributed to improvements made based on the quality control findings. Quality control also can provide the Congress, the public, and program managers better assurance that a program is being well managed.

Not All Programs Have Quality Control Systems

Supported by the Congress, HHS and the Department of Agriculture have established quality control systems for the AFDC, SSI, Medicaid, Medicare, and Food Stamp programs. Besides demonstrating billions of dollars in annual erroneous payments, these systems show those eligibility factors that need improved verification and provide information for the development of corrective action plans.

The Department of Education's Pell Grant program⁷ and the Department of Housing and Urban Development's (HUD's) Lower Income Housing Assistance (Section 8 Housing) program⁷ lack comprehensive quality control systems, although HUD is developing a system for its programs. Also, Education has contracted for a 3-year study of the accuracy of the Pell Grant program. Managers of these programs, therefore, lack comprehensive, statistically valid data on the extent and causes of errors and would have difficulty effectively targeting efforts to reduce erroneous payments.

Privacy And Cost Considerations

Quality control systems may intrude further into personal privacy than routine verification done by caseworkers. Besides reviewing verification done by a caseworker, a quality control reviewer will do additional verifying of client circumstances by obtaining evidence from third parties and/or visiting the client's home.

Also, quality control systems increase program administrative costs, which may affect their use in a given program. For example, the administrative costs of operating the AFDC quality control system are about \$30.4 million a year.

Quality Control Used For Sanctions

The Congress has required that the error rates in several programs be used to impose fiscal sanctions on states whose rates exceed specified tolerance levels. Based on prior work,⁸ we believe that sanctioning may lead agencies to identify fewer errors during quality control reviews. If so, some errors caused by inadequate verification methods may go unreported and the methods may remain inadequate. Therefore, sanctions may be counterproductive.

⁷See app. III for a description of this program.

⁸See, for example, GAO's report to the Chairman, Senate Committee on Finance, entitled Better Management Information Can Be Obtained From the Quality Control System Used in the Aid to Families with Dependent Children Program (HRD-80-80, July 18, 1980).

Who Should Determine When
Quality Control Is Used?

We believe that in many programs the benefits of using quality control systems outweigh the potential disadvantages. Although agencies can establish such systems through the regulatory process, many may not do so without encouragement by the Congress and/or OMB. The Congress may wish to require systems in all or specific federally funded benefit programs. Or OMB could encourage or require more extensive use of quality control systems without such a legislative mandate.

CHAPTER 3

VERIFICATION INFORMATION ISSUES

ARE THE RIGHT DATA AVAILABLE AND BEING USED TO VERIFY CLIENT- PROVIDED INFORMATION?

Sound decisions about eligibility and benefit amounts require reliable information about clients. To ensure the reliability of information through the verification process, program managers should have access to and use the right types of verifying data.

Variations Among Programs

There is a great variation among--and sometimes within--programs in the types and quality of data collected and used to verify client-provided information. For example, to verify earnings, the AFDC program uses third party wage records, while the Pell Grant program uses client-provided tax returns. Also, within the AFDC program the type of third party data used to verify earnings differs among states. Some use wage data accumulated by state employment agencies. Others obtain wage data from the Social Security Administration (SSA) and employers.

Federal And State Laws Restrict Data

Until 1984, use of tax return information (reported to the Internal Revenue Service or SSA) for verification in benefit programs was limited to earned income data to be used by two programs. The Deficit Reduction Act of 1984 made both earned and unearned income tax data available and required their use in the AFDC, Food Stamp, Medicaid, SSI, and State Unemployment Compensation programs.

Should additional programs have access to and be required to use these data? We believe they should if safeguards are adequate and if voluntary compliance with the tax system is not affected. As to safeguards, it should be recognized that many agencies are involved in administering benefit programs which makes prevention of improper disclosure of data more difficult.

(See pp. 35 to 39 for further discussions of safeguarding data.) Estimates of erroneous payments due to inaccurate income reporting by clients of programs not authorized to use the tax data are substantial; the estimate for the Veterans Pension program, for example, is \$100 million per year. Evidence suggests that a similar income reporting problem exists in the Section 8 Housing and Pell Grant programs.

The Deficit Reduction Act of 1984 also requires that wage information accumulated at the state level be made available to some benefit programs in all states. These data are not used, however, in other programs. For example, HUD has requested legislation to require states to provide wage data for use in the Section 8 program. Should these data be considered for more programs? We believe so because of the potential for reducing erroneous payments.

Program Structure Can Inhibit Access To Data

The HUD Section 8 Housing program is administered by local housing authorities and private organizations. It is unlikely that tax return information reported to the federal government will--or should--be released to these entities. Are there alternatives that could enable these programs to have the advantages of these data while protecting the data from undesirable disclosure?

Some Data Available But Not Used

Program managers may not be taking advantage of some available data. Credit and death data have been used to varying degrees among and within programs. To date, only limited use has been made of these data though they have been available for some time. Why? Are program managers unaware of their availability and the potential benefits of using them? Should agencies be required to determine whether their programs would benefit from using these data? Are there other data sources program managers should use? If so, who should identify them and ensure they are used?

Data Must Be Of Good Quality

Poor quality data can cause problems. For example, computer matching done with bad data may generate erroneous match results, which, if relied on, could

prove costly to the agency and the clients involved. What procedures should agencies follow to ensure verification data are of good quality?

Need To Assess Current Data Usage
And Related Privacy Protection

Using good data is crucial to good verification. Program managers depend more on automated systems to process large amounts of data. They should assess the quality of the data they are using and potential alternative data sources to make sure they are obtaining the best available data. They should consider requesting authority to obtain data to which they do not have access.

Program managers should know that access to additional data intensifies the need for privacy protection. Do some agencies need to improve their privacy protection procedures?

TO WHAT EXTENT SHOULD
DATA BE CENTRALIZED?

To take advantage of verification techniques such as computer matching, program managers need to have automated and centralized both the information to be verified and the information that verifies. Although data centralization by the government is not unconstitutional in and of itself, having a lot of data on a lot of people so readily available to the government raises privacy concerns.

Technology Makes Centralization
More Feasible

There are two ways to centralize particular types of data in computer systems. All of the data could be placed in one computer system, or similar data in two or more computerized data bases could be linked. Technological advances have made centralization through linkages more feasible. For example, to verify State Unemployment Compensation benefits, the Department of Labor is developing "INTERNET," a system that will connect all State Unemployment Compensation systems.

Data Verified And Data Used To Verify May Need To Be Centralized

The first type of data that may need to be centralized is client information to be verified. For example, HUD's Section 8 Housing program is administered at the local level, and there are no national or state level data bases with information on all clients. Without them, large-scale matching against such useful sources as wage data files would not be feasible. Should national data bases be considered for federally funded benefit programs that are not centrally administered? What are the potential costs and benefits of such data bases?

Information used to verify is the second type of data that may need to be centralized. Examples of such data include vital statistics or financial statistics. For example, the need to identify benefit recipients whose deaths had not been reported to program administrators led the Congress to require SSA to establish a national death information file. A similar approach for birth and marital data may also be justified. What other information put into centralized, computer-usable form would be useful for verification? Should information needs of benefit programs determine the automation and centralization of data on all Americans?

How Manageable Are Large Data Bases?

Some important questions concern predicting and controlling the future uses of data bases. Data bases may be established, often by legislation, for specific uses by specific entities. However, there may be a great demand for additional uses for any system that is in contact with a large number of people. For example, the Department of Labor is developing its INTERNET system for the Unemployment Compensation program, but already other agencies administering benefit programs would like access to it. Legislation and public perceptions regarding the uses of a new data base may or may not prevent the expansion of those uses in the future. These matters should be considered in deciding whether and how to establish centralized data bases.

Centralized Data Bases Raise
Privacy Fears--But Could They
Enhance Privacy Protection?

Centralized data bases are part of the public fears about George Orwell's "Big Brother"--an all powerful government that has divested its citizens of all personal privacy. Privacy questions often center on whether concentrating personal information constitutes surveillance beyond the needs of program administration. Past efforts to create a national welfare recipient file, for example, were opposed on privacy grounds. One critic described the proposed data base as an unprecedented national surveillance system.

On the other hand, it has been argued that some data centralization actually protects privacy. Instead of having a client's information in a variety of data bases, it resides in one place, where access may be controlled more easily. Is this argument valid? If so, does this advantage outweigh concerns about the possible consequences of centralizing data?

Benefits Of Centralization
Should Be Weighed Carefully

Agencies planning to centralize client information should consider whether (1) centralization will provide the benefits anticipated and (2) alternatives to centralization could provide the same benefits. National data bases of information that verifies can be useful and even necessary. Future proposals for national data bases, however, should weigh the overall benefit to program integrity against the potential invasion of privacy.

TO WHAT EXTENT AND WITH WHAT
SAFEGUARDS SHOULD CLIENT DATA
BE LINKED WITH OTHER DATA?

A data base link occurs when two or more entities agree to share data and create the mechanism for doing so. The data may be shared either continuously or intermittently.

Proliferation Of Data Base Links

To improve verification of important eligibility factors, program managers are establishing more and

more links with other assistance programs and with sources outside the benefit program environment. The President's Council on Integrity and Efficiency has inventoried more than 1,200 state computer matches with sources ranging from wage records to lottery winner files. Figure 6 on the following page shows some of the linkages that states could establish for the AFDC program through computer matches. Some states are establishing direct routine access to certain data sources, such as credit bureaus. Other states are creating clearinghouses where one inquiry will yield information from several data bases. Such clearinghouses could be particularly useful in implementing front-end verification techniques.

Data Base Links Can Give Agencies More Data Than They Need

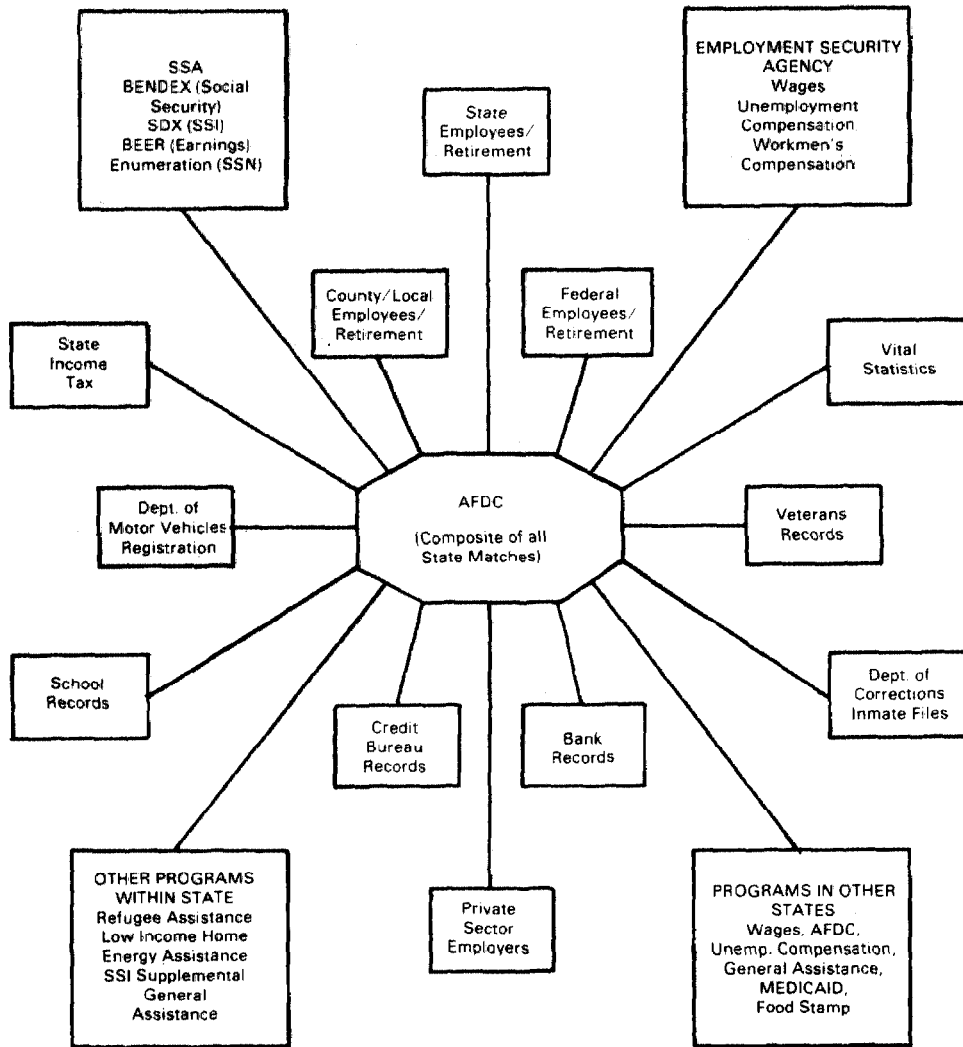
To protect privacy, agencies should collect only information relevant to verifying eligibility. However, with a name, a social security number (SSN), and linkage with other data bases, an agency can assemble much more information about a client than it needs for verification purposes. For example, credit reports obtained for leads on such items as address or marital status also reveal charge account codes and balances. Data base links also may reduce the client's knowledge about what information the agency can obtain. Rather than asking the client's consent to make inquiries about assets at his or her bank, the agency may seek such information through a computer match with automated bank records.

How Should Decisions About Establishing Links Be Made?

Many links seem to be established with little discussion of their appropriateness from a privacy standpoint. Most debate on privacy centers on protections for data management, such as procedures for disclosure, and not whether the data should be shared in the first place. Linkage to such sources as tax return information may require congressional action. But existing laws, such as the Privacy Act of 1974, may allow program managers to establish links with other information at their own discretion. For example, the Privacy Act's routine use provision allows agencies to use or disclose personal data for purposes compatible with the purpose for which the information was collected. Agencies use this provision to justify computer matching, a mechanism for linking. Critics of the provision claim that agencies interpret the provision so loosely as to allow almost any disclosure they wish to make.

Figure 6

**COMPOSITE OF DATA LINKAGES THROUGH COMPUTER MATCHES
BY AFDC PROGRAMS IN VARIOUS STATES**



NOTE: No single state has all of these links, but each link occurs in at least one state. With a few exceptions, however, these types of sources could be available in every state.

SOURCE: Department of Health and Human Services, Office of Inspector General, Inventory of State Computer Matching Technology; and GAO observation.

Should there be a mechanism to ensure discussion of whether proposed data links are appropriate and whether data sharing should be limited? At what level should this discussion take place?

How Can Privacy-Related Problems Be Addressed Once Links Are Permitted?

Once permitted, links raise other privacy problems. Many data bases used for verification in benefit programs contain information on people who have never applied for or received benefits. Linking them with a benefit program may risk unwarranted disclosure of their personal data. We observed agencies with direct links to credit bureau computers, enabling them to access any of the 100 million credit records in the files. How can agencies and data sources ensure that only proper records are accessed?

In some instances the agency using data from other sources may not be able to assure their accuracy. In such cases using the information only for leads becomes very important. The source agency may not be able to assure that challenges and changes to information will reach all users of the information. Will user agencies encounter problems because of inaccurate data obtained through data linkages? What procedures are needed to mitigate these problems and reduce the risk that improper decisions could be based on these sources?

Data Base Links Need Assessing

Data base links in federal programs happen incrementally and usually for justifiable purposes. Federal and state agencies' use of these links varies, but the trend toward more linkage is likely to continue. Although programs need to obtain good information for verification, the extent of, need for, and impact on privacy of data base links should be carefully assessed.

WHAT SHOULD BE THE POLICY ON
SOCIAL SECURITY NUMBER USE AND
HOW CAN FAULTY NUMBERS BE MINIMIZED?

Almost every American has an SSN. Although other numbers are used as identifiers, none compares to the SSN in terms of uniqueness and recognized acceptance.

It is used to obtain everything from a driver's license to food stamps. The SSN, used to identify individuals in many programs, allows pieces of information needed for verification to be easily collected, connected, and compared. It is thus the key ingredient for many computer matches. However, some people fear government could also use it as a skeleton key to unlock everyone's closet of private information. Concern over public and private entities' misusing the SSN led to restrictions, in the 1974 Privacy Act, on the SSN's use by federal, state, and local agencies.

Some Programs Cannot Require SSNs

Some programs, including AFDC, Food Stamp, and SSI, use the SSN as a primary identifier and can require its disclosure as a condition of eligibility for federal benefits. However, programs such as Section 8 Housing cannot require, though they may request, disclosure of the SSN. Inability to require an SSN can hamper verification, as demonstrated by HUD's efforts to match low-income housing rolls with state wage data and federal employee files. Only about 23 percent of the tenants had SSNs on file and could be included in the match.

Problems Caused By Faulty SSNs

Client fraud and agency mistakes create faulty SSNs. Faulty SSNs can be costly to programs and clients. For example, Mr. Jones applies for food stamps, using a false SSN. The eligibility worker compares it to the state wage data base, and because no match occurs, the program does not discover that Mr. Jones earns \$50,000 a year. Or, Mrs. Smith, who has five children and no job, gives the correct SSN when applying for AFDC benefits, but a wage data base match indicates considerable income. After some time and trouble, it is discovered that an employer mistakenly used Mrs. Smith's SSN to post the earnings of an employee.

Prior GAO reports show how faulty SSNs generate duplicate benefit payments, payments to nonentitled individuals, and payments to deceased individuals. Agencies' lack of internal controls and procedures to verify client SSNs contribute to this problem. A few agencies, however, have established procedures for verifying SSNs. For example, the Office of Personnel Management has verified SSNs in its annuity rolls by matching directly with official SSN file numbers. The

Internal Revenue Service verifies SSNs by matching against updated numbers provided by SSA. The increase in computer matching increases the need for effective procedures to verify SSNs.

Reexamination Of SSN
Policies And Practices

A reexamination of current policies and practices regarding the SSN is in order, answering questions such as the following:

- Should all benefit programs be allowed to require client SSNs as a condition of eligibility?
- How extensive is the problem of inaccurate SSNs in benefit program data bases and in data bases used to verify information?
- What standard of accuracy should be demanded of the SSN?
- How can agencies be encouraged to verify the SSNs they collect and maintain?
- What should be accepted as the preferred method of SSN verification?

The answers to these questions will be shaped by the resolution of an overriding issue, the true status of the SSN. Some say the use of the SSN as a national identifier should be strenuously avoided. Others say that the SSN already has the function, if not the name, of a national identifier and that this should be recognized and its accuracy improved.

CHAPTER 4

PRIVACY PROTECTION ISSUES

WHAT RIGHTS SHOULD A CLIENT HAVE AND HOW SHOULD THEY BE SAFEGUARDED?

When a client supplies information to an agency, seeks information from the agency, or faces decisions on benefits, what rights should he or she have? We have identified four possible client rights--there may be others.

Right To Know Purpose And Use Of Information

- I. Should the client have the right to be told why the agency is collecting information and what the agency will or may do with it?

Consider two requests that appear on one state's application form for public assistance:

"Does anyone in the home use a teletype for the deaf?"

"Check appropriate box: White Black

American
Indian Other ."

The first request may allow assignment of a specially qualified caseworker. The second helps the benefit agency to be better prepared to answer the needs of certain groups. However, without adequate explanation, these requests may seem intrusive and irrelevant.

Consider also the following:

"The information submitted may be disclosed outside the Veterans Administration [VA] only as permitted by law, including the routine uses identified in VA system of records 58VA 21/22/28, Compensation, Pension, Education and Rehabilitation Records--VA published in the Federal Register."

The preceding statement, responding to requirements of the Privacy Act of 1974 for federally administered programs, appears on a benefit application form, presumably to tell what will or could happen to client information. But what help does it offer the client? There is no explanatory example, only a direction on how to pursue information through a system that may be hard to understand for someone without a knowledge of VA recordkeeping.

The foregoing are examples of communications offered the applying client. What happens when a client on the rolls is to be informed of some planned use of the information about him or her? Adequate notification as prescribed in the Privacy Act is publication of the intended use in the Federal Register, a journal probably unknown to most clients.

The VA example illustrates how federal agencies--responding to federal law--seek to inform clients. Some state-administered programs, not under the Privacy Act, may not be required to provide clients even the preceding level of communication.

Right To See And Challenge Information

- II. Should the client have the right to see information the agency collects; to challenge that information's accuracy, completeness, and timeliness; to have that information corrected if the agency agrees; and if the agency disagrees, to have adequate administrative and judicial recourse?

This right allows the client to see if information the agency has is adequate. Without this right, the client may be more vulnerable to benefit denial or reduction based on faulty information--and to this information being shared with others. (Because incorrect information may be corrected, exercise of this right helps agencies, too--though quality control should not depend solely on the client.)

The 1974 Privacy Act provides this right for records maintained by federal agencies. However, laws governing what information the client can see, under what conditions, and what challenges and/or alterations the client is allowed vary considerably among state and privately administered programs.

Where recognized rights exist, agencies have an obligation to clearly communicate them to the clients. In reviewing over 50 program application documents, we saw only two instances--in a student aid brochure and a state AFDC handbook--of the right being spelled out in writing. Are clients being advised orally at the time of application? If not, how would they know they have this right?

Right To Refute Information Affecting Benefit Decisions

III. Should the client have the right to refute any benefit-affecting information before the agency denies or reduces benefits because of that information?

In some instances information that contradicts client-provided information supporting eligibility and benefit amounts has been accepted without allowing the client to challenge it before benefit reduction or denial. Some of this information may be obtained by comparing computer files. As a result a client may have to file a formal appeal to overturn the agency's decision. If the information is refutable, it is in the agency's interests as well as the client's to avoid a formal appeal, which can be costly and time consuming.

Right To Be Free Of Intimidation And Harassment

IV. Should the client have the right to be free of intimidation and harassment?

Applying for benefits--even those guaranteed by an insurance contract--can be time consuming, fatiguing, and anxiety producing. Clients include the old, the feeble, persons of limited intelligence or minimal education, and the easily discouraged. An agency might intimidate clients by giving the impression that voluntary information was essential information, whose absence would delay or prevent an eligibility decision. Such a situation occurred in one federally administered program, which, in an attempt to obtain voluntary information, used consent forms that a federal circuit court enjoined as coercive. In another case, a "workfare" program administered by a California county was found to harass clients by requesting repeated verification of the same item.

What Standards And Safeguards
For Client Rights Are Needed?

Agencies should examine their programs to determine what rights clients have and perhaps initiate efforts to make caseworkers more aware of the client's perspective. Moreover, those rights should be clearly communicated to the clients. In addition, the following questions need to be addressed if equity is to be assured across and within programs.

- How are client rights defined--legally and administratively--in federal benefit programs?
- What safeguards--formal and informal--protect client rights in federal programs?
- If standards to define safeguards are needed, who should provide and oversee these standards--federal government, state government, agencies, private parties, or some combination of these?
- Should these standards apply to all benefit recipients, regardless of what level of government funds the program?

Securing client rights can cost time, money, and forbearance (some clients will misuse some rights). Protecting these rights, however, is a key issue in ensuring that verification is conducted fairly and clients receive the correct amount of benefits.

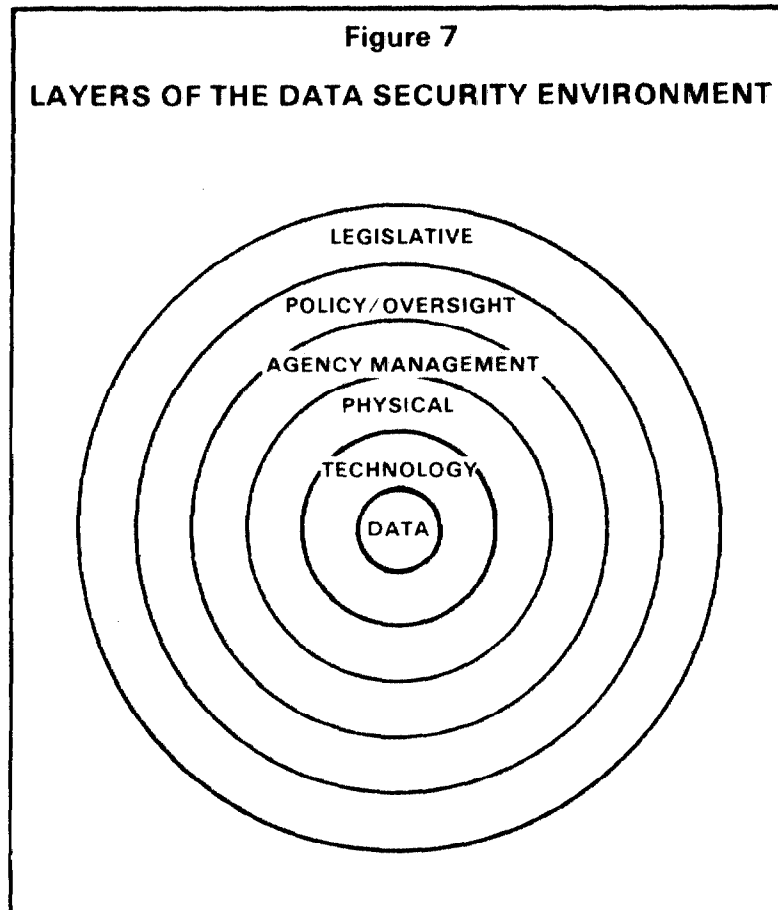
WHAT CONSTITUTES ADEQUATE
DATA SECURITY?

Clients have concerns about the security of data they would prefer to keep confidential but must provide agencies to receive benefits. Benefit-providing agencies obtain additional data in verifying data clients provide, and many agencies use and store both types of data in computerized systems. A 1983 Louis Harris poll showed that 60 percent of the public believe the privacy of personal data in computers is not adequately safeguarded.

Data Security Defined

Data security may be defined as the legal, administrative, physical, and technological measures to safeguard data from inappropriate destruction, disclosure, or change, whether accidental or intentional. Both automated and nonautomated data collected and used in the eligibility process need to be safeguarded. Much concern about adequate safeguards is shifting to computerized systems, because more data are being automated.

Once personal data are collected and automated, how they are safeguarded is affected by federal and state laws; agency policies, personnel, and management techniques; and the computer and its physical and technological safeguards. The layers of security surrounding personal data are shown in the following chart.



Congressional Actions:
Past And Present

The Privacy Act of 1974, the Tax Reform Act of 1976, the Deficit Reduction Act of 1984, and some benefit program laws all include provisions requiring safeguards for data. The Brooks Act of 1965, the Paperwork Reduction Act of 1980, and the Federal Managers' Financial Integrity Act of 1982 established federal agency roles for managing automated systems. Each law was enacted for a specific purpose other than improving or ensuring data security, although each has data security provisions. But, are these provisions comprehensive enough to ensure data security throughout federal benefit programs? Are they too fragmented to ensure accountability?

In October 1984, the Congress enacted the Counterfeit Access Device and Computer Fraud and Abuse Act of 1984. This law imposes criminal penalties for certain computer-related crimes. Are criminal penalties alone an effective deterrent to computerized data security violations?

Are Policy-Making And Oversight
Adequately Performed?

Four federal agencies are responsible for establishing administrative requirements for safeguarding personal data. They are also to ensure that these requirements are implemented by the remaining executive agencies.

- OMB, the key policymaking agency, develops guidelines and monitors compliance.
- The General Services Administration issues regulations relating to physical security of computerized systems and security requirements in purchasing computers.
- The National Bureau of Standards develops some uniform federal security standards for automated systems.
- The Office of Personnel Management develops personnel security policies.

Is a comprehensive approach to safeguarding data needed, instead of this shared responsibility? In April 1984, a House subcommittee¹ recommended that a national commission be created to study security issues, including the vulnerability of computer systems, computer crime, the effect of new technologies on personal privacy, and the federal role in protecting personal data.

In our continuing efforts to review automated system management, we have stated that OMB's computer security guidelines are inadequate. We also concluded that OMB should improve its monitoring of agency compliance with guidelines.

Are There Management Problems?

Data security is basically a management problem, which requires a management solution. The President's Council on Integrity and Efficiency reported that program managers lack knowledge of systems controls. Also, according to OMB, managers often think about computer security only after the security of their systems has been breached.

The cost to protect computerized data may deter managers from implementing security measures, if protection has to compete with agency goals. However, the cost of adequate security should be weighed against the cost of inadequate security. If files are accessed and altered, the cost to reconstruct them may exceed the cost of security improvements.

Safeguards: Physical And Technological

Along with sound management of automated systems, physical and technological safeguards are needed to protect data. Concerns about security weaknesses in both automated and nonautomated systems are well-founded. A 1983 survey by the HHS Inspector General for the President's Council on Integrity and Efficiency identified 172 known cases of computer-related fraud and abuse in government agencies. Participants in the survey believed these cases represented only a small portion of actual activities. The vulnerability of computers is illustrated by a federal employee's

¹House Committee on Science and Technology, Subcommittee on Transportation, Aviation, and Materials.

success in reactivating computerized cases of deceased clients, then reinstating their benefits payable to fictitious names.

We have also noted failures to:

- properly store and guard hard copy records,
- secure or restrict areas where data are maintained, and
- limit the amount of data disclosed for program purposes.

In addition, we observed that federal monitoring of states' compliance with federal safeguarding requirements is inadequate.

What Needs To Be Done?

The vulnerabilities in automated and nonautomated systems will probably continue to cause clients, program managers, and others to raise privacy intrusion and fraud concerns. In addressing these concerns about data security, the following should be explored.

- Are the existing laws and regulations for counteracting these vulnerabilities adequate?
- Should the current shared responsibility for data security continue or should steps be taken to centralize this responsibility?
- Are physical and technological safeguards for automated systems adequate?
- Are managers adequately trained to effectively implement safeguards?

SHOULD THERE BE A NATIONAL DATA PRIVACY AND CONFIDENTIALITY POLICY FOR FEDERAL BENEFIT PROGRAMS?

Federal, state, and local governments--and some private entities acting for public agencies--collect, use, and share data on millions of benefit program clients. However, government policies and procedures to protect privacy and data confidentiality are not uniform, and oversight responsibility is unclear, fragmented, or nonexistent.

Benefit programs directly administered by federal agencies are subject to safeguards of the Privacy Act of 1974. The act, however, generally does not cover federally funded programs administered by state and local agencies or private entities. Other federal or state laws may provide some protection. Moreover, where the Privacy Act does apply, the effectiveness of its implementation and oversight has been questioned.

Most other federal privacy-related laws are narrow in scope. For example, the Tax Reform Act of 1976 deals with privacy and confidentiality of federal tax return information. The Family Educational Rights and Privacy Act of 1974 covers student school records.

Privacy Commission Findings On Welfare Record Keeping

In its study of selected nonfederally administered welfare programs, the Privacy Protection Study Commission said that, though the Privacy Act did not apply, states accepting federal funds had to adhere to federal program standards aimed at protecting individuals.²

However, federal constraints on states' record-keeping activities have varied over time and among programs. When federal law was silent, states established their own record-keeping policies and practices. Existing federal regulation represented minimum requirements to be met or surpassed in state statutes, regulations, or plans. As a result, welfare record keeping reflected

" . . . a medley of practices prescribed by Federal statutes and regulations in some areas, by State laws in others, by a combination of the two, or, in some cases, by no formal policy at all."³

²Privacy Protection Study Commission, Personal Privacy in an Information Society (Washington: GPO, 1977), pp. 445-486.

³Personal Privacy, p. 452.

Paperwork Commission Findings
On Privacy And Confidentiality

The Commission on Federal Paperwork, in its report on privacy and confidentiality, found:

- Federal laws treating confidentiality and disclosure of information were inconsistent and confusing. Uniform federal standards did not exist.
- Information management practices of federal agencies which deal with confidentiality and data disclosure were inconsistent and, at times, contradictory.⁴

Possible Effects Of Not
Having A National Policy

According to the Privacy Study Commission, the lack of a national privacy and confidentiality policy for federally and state-administered benefit programs allows:

- Unfair record-keeping practices.
- Records disclosure policies that are inconsistent from program to program and that often confuse program administrators, as well as program clients, and may create unnecessary administrative costs.
- Problems in exchanging information among and within agencies and limits on the range of permissible disclosures of program records.
- Total lack of protection for clients' privacy interests because information flows between federally and nonfederally assisted programs are subject to no coherent policy.

⁴Commission on Federal Paperwork, Confidentiality and Privacy, and Final Summary Report (Washington: GPO, 1977).

Both Commissions And Recent Congressional Hearings Found Existing Oversight Weak

The Privacy Study Commission found federal oversight of state record-keeping practices weak, even where requirements were clear. Some federal agencies, it concluded, lacked resources to adequately monitor state practices, so that a state could ignore or circumvent federal regulations with impunity. The Paperwork Commission found inadequate compliance machinery for enforcing federal information laws, including the Privacy Act.

Congressional hearings in June 1983 found (1) OMB's Privacy Act oversight efforts were deficient, (2) better government-wide privacy oversight was needed, and (3) better representation of privacy interests in government decision making was needed.⁵

As a result of those hearings, we are studying the effectiveness of Privacy Act operations at selected federal agencies.

Privacy Commission Recommendations

The Privacy Study Commission argued for establishing a comprehensive and generally applicable record-keeping policy to guide programs at all levels. The Commission believed such a policy would have to be enacted by the Congress, spelled out in federal regulations, and overseen by federal agencies.

This notwithstanding, the Commission strongly recommended against extending the Privacy Act to other than federal government agencies, pointing out, among other reasons, that:

". . . While the Commission recognizes that government intervention in some areas of recordkeeping may not be avoidable, it strongly believes that the safeguards for personal privacy it seeks to establish and

⁵House Committee on Government Operations, Subcommittee on Government Information, Justice, and Agriculture. Oversight of the Privacy Act of 1974. Hearings. 98th Cong., 1st sess. (Washington: GPO, 1983).

preserve require and, in fact, demand that such intervention be limited and controlled."⁶

In lieu of extending the Privacy Act, the Commission recommended that the Congress enact a law requiring each state, as a condition of receiving federal financial assistance for welfare programs, to enact a fair information practices law applicable to records of such programs' clients.

Paperwork Commission Recommendations

The Paperwork Commission recommended

- comprehensive revision of the Privacy Act's non-disclosure provisions, to replace and consolidate existing confidentiality provisions in specific program legislation;
- extension of the Privacy Act to certain programs and activities receiving federal financial assistance, including welfare, health, and education programs administered by state or local agencies or private organizations; and
- establishment of a new federal executive branch agency to monitor and oversee compliance with federal confidentiality and disclosure laws, including the Privacy Act and the Freedom of Information Act.

The Basic Issue Remains Unsettled

Thus, while these two commissions agreed on the problem, they disagreed on solutions, particularly regarding extension of Privacy Act coverage. To date no comprehensive federal privacy and confidentiality policy and oversight legislation has been enacted. To fill the void, states have enacted numerous laws, most narrow in scope.⁷ The issue of a national data privacy and confidentiality policy for federal benefit programs remains unsettled. We believe that any further study should seek answers to the following:

⁶Personal Privacy, p. 498.

⁷See, for example, Compilation of State and Federal Privacy Laws, 1981 edition, by Robert Ellis Smith (Privacy Journal, 1981).

- Should a national privacy and confidentiality policy be established for all federally funded benefit programs at all levels of government?
- Should the Privacy Act be extended to state-administered, federally funded benefit programs?
- What effect would a national policy have on eligibility verification in benefit programs?
- What minimum protection should a national policy include?
- How would a national policy affect state rights?
- What would it cost to establish and implement a national policy?
- Who would or should be responsible for implementing a national policy?
- How much oversight would be necessary?
- Who should provide oversight?

Answers to these questions and those raised in preceding issues should help the Congress and others achieve that delicate balance between eligibility verification and privacy protection in federal benefit programs.

CHAPTER 5

CONCLUDING THOUGHTS ON THE ISSUES:

WHERE DO WE GO FROM HERE?

THE "DELICATE BALANCE"

In looking at eligibility verification and privacy issues, a careful balance needs to be struck between protecting privacy rights and meeting program requirements for verifying data on which eligibility decisions are made. Laws alone cannot achieve this balance. No law or group of laws can solve all the problems of privacy protection while ensuring that eligibility information is properly verified. Rather, the balance is brought about by the people who implement or are affected by these laws--through their understanding and knowledge of what privacy is and of what must be given up or protected in ensuring the proper awarding of benefits.

Policies adopted to protect privacy or improve verification must be viewed in terms of their impact on both goals or they can work contrary to their intended purpose. For example, if to verify key information caseworkers must access numerous data sources or conduct home visits, because reliable centralized data are not available or cannot be accessed, the risks of infringing on individual privacy rights may be increased. Centralizing data to ease access, however, is not without both privacy and verification problems. How safeguards can be designed to preclude inappropriate access, and how data can be kept accurate and current, are two obvious problems that surface.

WHO SHOULD ADDRESS THE ISSUES?

We believe that the Congress, OMB, and the federal, state, and local agencies administering the programs need to investigate further ways to improve eligibility verification and privacy protection in federal benefit programs.

While we believe that the Congress, OMB, and program managers should all play a role in addressing each of the 13 issues we have identified, 7 of the issues pose predominantly policy-oriented questions needing decisions by the Congress and/or OMB. These are:

- What is the proper role of computer matching?
p. 10)
- What should the policy be on computerized front-end verification? (p. 13)
- To what extent should data be centralized?
(p. 24)
- To what extent should data be linked? (p. 26)
- What should be the policy on using social security numbers? (p. 29)
- What rights should clients have and how should they be safeguarded? (p. 32)
- Would there be a national data privacy and confidentiality policy? (p. 39)

The other 6 issues are predominantly operationally oriented, and although the Congress and OMB need to be involved in addressing them, these issues should receive immediate consideration by program managers. These are:

- Uniform verification procedures: Possible or not? (p. 5)
- What should be the criteria for selecting verification techniques? (p. 8)
- Error-prone profiles: How good? (p. 15)
- Which programs should have a quality control system? (p. 18)
- Are the right data available and used? (p. 22)
- What constitutes adequate data security?
(p. 35)

This report can aid in addressing both types of issues, as the following three suggested uses illustrate.

WHAT CAN PROGRAM MANAGERS DO?

Program managers could overlay the report on their operations to determine which issues apply to their programs and take or suggest appropriate action. For example, where eligibility factors are defined the same way among programs, agencies could coordinate their verification efforts to avoid duplication. Also, program managers could assess the quality of data now used in verification as well as potential alternative data sources to make sure the best data available are used. Moreover, they should consider requesting authority to obtain reliable data from sources they currently cannot access.

WHAT CAN OMB DO?

OMB could use the report, first, to gauge where various programs are in reference to the issues discussed and, second, to allow sharing of commonly beneficial knowledge among federally funded benefit programs. For example, OMB could take the lead in government-wide studies of the use of error-prone profiles and of what privacy protection rights clients currently have, what rights they should uniformly have among programs, and what actions--including proposing or promoting federal or state legislation--may be needed to secure those rights for all clients.

WHAT CAN THE CONGRESS DO?

The Congress could refer to the report whenever it changes laws in ways that might affect eligibility verification and/or privacy protection in federal benefit programs. The report could also be used as a starting point from which further debate in the form of hearings, panels, or less formal research might proceed. For example, the Congress could reexamine current government policies and practices regarding the use of the SSN and ultimately resolve the overriding issue of the SSN's status as a national identifier. The Congress could also consider whether further study should be made of the need for national data privacy and confidentiality policy to adequately protect the privacy rights of all federal benefit program clients.

The chart on the following page provides more detail on examples of potential responses to each of the 13 issues.

Figure 8
EXAMPLES OF POTENTIAL RESPONSES TO ISSUES

ISSUE	CONGRESS COULD:	OMB COULD:	PROGRAM MANAGERS COULD:
UNIFORM VERIFICATION	Legislate changes to make eligibility factors more uniform and allow programs to verify factors in the same way.	Aid in simplifying verification across programs.	Coordinate verification across programs.
VERIFICATION TECHNIQUE SELECTION CRITERIA	Continue hearings to decide whether to support, mandate, or prohibit various techniques.	Develop criteria, which include privacy considerations, for determining when a technique should be used.	Evaluate benefits of techniques being used.
COMPUTER MATCHING	Mandate more oversight and control of federal and state computer matching.	Strengthen its oversight of computer matching.	Follow applicable guidelines, observe due process rights, and conduct only necessary matches.
FRONT-END VERIFICATION	Consider whether front-end verification should be legislative policy.	Expand its efforts to evaluate the technique's effectiveness.	Identify opportunities for front-end verification and evaluate its effectiveness when used.
ERROR-PRONE PROFILES	Continue inquiries as to whether profiling is being conducted properly and should be institutionalized across programs.	Determine if profiling is being properly used and whether it should be used more.	Determine if they are using profiling properly or if they should use it more.
QUALITY CONTROL SYSTEMS	Require quality control systems in all benefit programs.	Encourage or require more extensive use of quality control systems.	Establish quality control systems through the regulatory process.
DATA AVAILABILITY	Consider granting wider access to restricted data and authorizing new data bases where warranted.	Identify unmet data needs across programs, considering privacy implications. Encourage use of data already available and assist agencies' attempts to access data.	Examine quality of data used, identify other sources if necessary, and attempt to access them.
DATA CENTRALIZATION	Review existing and proposed centralization to help balance verification needs and privacy protection.	Review existing and proposed centralization to help balance verification needs and privacy protection.	Determine whether existing and proposed centralization will benefit their programs (without undue privacy intrusions) and identify alternatives.
DATA LINKAGE	Review existing and proposed data base links to help balance verification needs and privacy protection.	Review existing and proposed data base links to help balance verification needs and privacy protection.	Determine whether existing and proposed data base links are necessary and privacy is being protected.
SOCIAL SECURITY NUMBERS	Resolve the status of the SSN as a national identifier and its use as a condition of eligibility in benefit programs.	Identify programs that would benefit from use of the SSN and aid in efforts to improve the accuracy of the numbers.	If SSNs are used, improve their accuracy. If SSNs are not used, determine whether their programs need them.
CLIENT RIGHTS	Consider establishing uniform client rights across federal benefit programs.	Lead examination of client rights in federal benefit programs and suggest standards.	Examine current client rights and increase agency and client awareness of these rights.
DATA SECURITY	Continue to examine the adequacy of the existing federal/state security framework.	Emphasize to agency managers the importance of safeguarding data and strengthen its guidelines.	Assess existing safeguards over client data. Increase awareness of the need for security.
NATIONAL PRIVACY POLICY	Consider the need for legislation to uniformly protect privacy rights in all benefit programs whether administered at the federal or state level.	Review privacy protection across programs and identify gaps which could be remedied administratively.	Review privacy protection in their programs and take appropriate action.

WHAT IS THE LARGER VALUE OF THIS REPORT?

Putting it in slightly different terms: We see this report as raising specific questions and, in some instances, pointing toward possible answers. But the report's larger value may lie in highlighting for decision makers the need to explore and resolve important issues surrounding two often competing interests--eligibility verification and privacy--in benefit programs that affect the lives of nearly all Americans and account for nearly half the federal budget.

GLOSSARY

Access	The ability and the means necessary to retrieve data, communicate with (i.e., provide input to or receive output from), or otherwise make use of information in a computer system.
Benefit programs	Programs funded and administered by or through the government, providing cash or in-kind payments to clients who meet program eligibility requirements. The programs in this report are either needs based or insurance based, as defined below.
Clients	Applicants and recipients of the programs discussed.
Computer matching	The computerized comparison of two or more automated systems of records to identify information about individuals common to two or more of the record systems. A program control tool used to identify inaccurate information which results in erroneous payments being made by benefit-paying agencies.
Computer security	The technological safeguards and managerial procedures that can be applied to computer hardware, programs, and data to protect computerized information from unauthorized disclosure, alteration, or destruction.
Confidentiality	The status accorded to private data and the degree of protection that must be provided for such data. Data confidentiality applies not only to data about individuals but to any proprietary or sensitive data that must be treated in confidence.

Cost benefit	The comparison of the monetary value of the benefits of an effort with the dollar costs of that effort.
Cost effectiveness	The comparison of the cost of a method to achieve a given objective (such as verification) with all of the benefits from using that method, even though some of the benefits may not be easily expressed in monetary terms.
Data security	The mechanisms and techniques that protect data against accidental or deliberate modification, destruction, or disclosure.
Due process	The principle that decisions on rights or benefits should be neither arbitrary nor capricious and the procedures by which the individual is informed of the information government uses to determine his or her obligations or benefits and under which the individual has a way to challenge information when the government takes action that affects him or her.
Eligibility verification	The process of determining whether client information is sufficiently accurate, complete, understandable, and timely to prove the client qualifies for program benefits.
Error-prone profile	An analysis that depicts characteristics of applicants that are most likely to provide inaccurate information, resulting in erroneous payments.
Front-end verification	The process of determining whether a client is eligible for benefits before any form of benefit payment is made.

Insurance-based programs	Those programs where benefits are based on contributions by or on behalf of the clients and are paid to the clients, their spouses and/or dependents, or their survivors. Under this definition we have included non-needs-based programs where entitlement is based on military service.
Needs-based programs	Those programs where benefits are not based on contributions by or on behalf of the clients, but are decided by a needs standard set by federal and/or state governments.
Privacy	The degree to which an individual can decide whether, when, and to whom personal information is shared or released; can control when, and under what circumstances, others can enter his or her physical environment, such as the home; and can preserve an inner sense of autonomy even when information must be provided or intrusions into physical space must be allowed.
Quality control	A management tool to ensure the proper and correct expenditure of public funds, through locating unacceptable performance and ineffective policies and taking corrective action on them.
Routine use	As provided in the Privacy Act of 1974, the use or disclosure of information about an individual for a purpose that is compatible with the purpose for which the information was originally collected.

LISTING OF FEDERAL NEEDS-BASED AND
INSURANCE-BASED BENEFIT PROGRAMS,
BY TYPE OF BENEFIT

NEEDS-BASED BENEFIT PROGRAMS¹

Cash Programs

*AFDC - Adoption Assistance	Refugee Assistance - state administered
- Family Group	*SSI - Aged
- Foster Care	- Blind
- Unemployed Parent	- Disabled
Earned Income Credit	VA - Dependency and Indemnity Compensation (Parents)
Emergency Assistance - Needy	*VA - Pension (all)
General Assistance - Indians	

Education Programs

Bilingual Education	Migrant High School Equivalency Program
Bilingual Education (Vocational Training)	National Defense Student Loan
Centers for Independent Living	*Pell Grant
Chapter One Migrant Education	Programs for Students from Disadvantage Backgrounds (TRIO Programs)
College Assistance Migrant Programs	Rehabilitation Services - Basic Support
College Work Study	Rehabilitation Services - Special Projects
Education for Handicapped Children	State Student-Incentive Grant
Guaranteed Student Loan	Supplemental Education Opportunity Grant
Handicapped Preschool & School Programs	Vocational Education - Work Study
Headstart	
Health Careers Opportunity	
Health Professionals Schools for Indians	
Indian Education - School Assistance	
Indian Higher Education	

Food Programs

Child Care Food	Nutrition Assistance for Puerto Rico
Commodity Supplemental Food	Nutrition for Elderly
Emergency Loans (Agriculture)	School Breakfast
Food Distribution - Needy Families	School Lunch
*Food Stamp	Special Food - Women/Infants
Indian Reservations (Food Stamp)	Special Milk - Free
	Summer Food - Children

*Programs included in GAO's study and briefly described in appendix III.

¹Does not include block grant programs because of the discretionary nature of such programs.

Housing Programs

Congregate Housing Services	Mortgage Insurance - Market Rate
Farm Labor Housing Loan/Grant	Rehabilitation Loans
Home Ownership Assistance	Rent Supplements
Housing for Elderly or Handicapped	Rural Housing Loans
Indian Housing Improvement	Rural Housing Repair Loan/Grant
Interest Reduction Payments	Rural Housing Site Loans
*Lower Income Housing Assistance	Rural Rental Assistance Payments
Low-Rent Public Housing	Rural Rental Housing Loans
Mortgage Insurance - Low Income	Rural Self-Help Technical Assistance

Labor Programs

Employment Services
 Employment and Training Assistance -
 Dislocated Workers
 Job Corps
 Migrant and Seasonal Farm Worker
 Senior Community Service Employment
 Summer Youth Employment
 Trade Adjustment Assistance - Workers
 Veterans Employment

Medical Programs

Community Health Centers
 Indian Health Services - General
 *Medicaid
 Medical Assistance to Refugees
 Migrant Health Centers

Service Programs

Child Welfare Services
 Entrant Assistance - Cuban/Haitian
 Indian Child Welfare
 Indian Employment Assistance
 Indian Social Services - Child Welfare
 Legal Services
 Social Services for Refugees
 Special Program for Aging
 Special Program for Aging Indians

Energy Programs

Weatherization Assistance

*See note, p. 53.

INSURANCE-BASED BENEFIT PROGRAMSCash ProgramsAir Force

Disability
Retirement
Survivors

Army

Disability
Retirement
Survivors

Department of Labor

Black Lung
Federal Employees
 Compensation
Federal Unemployment
 Compensation
Servicemen's Unemploy-
 ment Compensation
*State Unemployment
 Compensation

Federal Civil Service

*Disability
*Retirement
*Survivors

Marines

Disability
Retirement
Survivors

Navy

Disability
Retirement
Survivors

Railroad

Disability
Retirement
Sickness
Survivors
Unemployment Compensation

Social Security Administration

Black Lung
*Disability
*Retirement
*Survivors

Veterans Administration

Adjusted Service & Dependency Pay
Burial Expense Allowance
Burial Plot Allowance
Clothing Allowance (Disabled)
*Disability Compensation
Dependency and Indemnity
 Compensation (Spouse/Children)
Education - Veterans/Military
Education - Wives/Children
Flag to Drape Coffin
Grants - Autos and Equipment for
 Disabled

Grants - Specially Adapted Housing
Headstone or Grave Maker
Invalid Lifts and Other Devices
Mortgage Life Insurance
 (Adapted Housing)
Special Allowance for Dependents
Special Benefits for Certain Retired
Special Pension for Medal of Honor
Vocational Rehabilitation

*See note, p. 53.

Medical ProgramsHHS-Health Care Financing Administration

- *Medicare - Hospital
- *Medicare - Supplementary Medical

Department of Labor

Black Lung-Medical

Veterans Administration

VA Hospital and Medical Benefits

Total benefit programs:

Needs-based programs	85
Insurance-based programs	<u>51</u>
Total	<u><u>136</u></u>

*See note, p. 53.

BRIEF DESCRIPTIONS OF
SELECTED FEDERAL NEEDS-BASED
AND INSURANCE-BASED BENEFIT PROGRAMS
INCLUDED IN GAO'S STUDY

NEEDS-BASED PROGRAMS

1. AID TO FAMILIES WITH DEPENDENT CHILDREN PROGRAM
(Family Group and Unemployed Parent)
=====

Authorization: Social Security Act, Title IV-A

Program Administration: State
Federal Funding: About 55%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
To make cash payments directly to eligible needy families with dependent children to cover costs for food, shelter, clothing, and other items of daily living recognized as necessary by each state's program.	Needy families with dependent children under 18 deprived of parental support or care because: --Fathers are continuously absent from the home, incapacitated, deceased, or unemployed. --Mothers are incapacitated, deceased, absent, or unemployed.	Department of Health and Human Services Social Security Administration State and local welfare agencies

2. FOOD STAMP PROGRAM
=====

Authorization: The Food Stamp Act of 1964

Program Administration: State
Federal Funding: 100%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
To improve the diets of low income households by supplementing their food buying ability. Recipients receive monthly allotments of stamps based on their income and household size.	Households may participate if they are found by local welfare officials to be in need of food assistance. Eligibility is based on income level, family size, and level of resources.	Department of Agriculture Food and Nutrition Service State and local welfare agencies

3. LOWER INCOME HOUSING ASSISTANCE PROGRAM
=====

Authorization: United States Housing Act of 1937, Section 8 Program Administration: Federal/Private
Federal Funding: 100%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
<p>To aid lower income families in obtaining decent, safe, and sanitary housing in private accommodations and to promote economically mixed existing, newly constructed, and substantially and moderately rehabilitated housing.</p>	<p>Very low income families-- those with income less than 50% of median income for area; lower income families-- income less than 80% of median income for area (incomes are adjusted for family size); or a low or very low income single person. At least 90% of the families assisted should be very low income.</p>	<p>Department of Housing and Urban Development Public housing authorities Private organizations</p>

4. MEDICAID PROGRAM
=====

Authorization: Social Security Act, Title XIX Program Administration: State
Federal Funding: 50% - 77.4%

<u>Program Purpose</u>	<u>Who Is Eligible to Apply</u>	<u>Responsible Organizations</u>
<p>To provide financial assistance to states for payments of medical assistance on behalf of cash assistance recipients and, in certain states, on behalf of other medically needy who, except for income and resources, would be eligible to receive cash assistance.</p>	<p>Needy persons who are over 65, blind, disabled, or members of families with dependent children, or, in some states, persons under 21 years of age, may apply. Eligibility is determined by the state, in accordance with federal regulation.</p>	<p>Department of Health and Human Services Health Care Financing Administration State and local welfare agencies</p>

5. PELL GRANT PROGRAM
=====

Authorization: Higher Education Amendments of 1972

Program Administration: State/Private
Federal Funding: 100%

Program Purpose

To provide financial assistance for educational costs to undergraduate students (attending an eligible post-secondary institution) who demonstrate financial need. Grants range from \$200 to \$1,800 and are based on financial need and costs of attending the institution chosen. The Pell grant, together with family contributions, provides the foundation of student assistance upon which all other financial aid is built.

Who Is Eligible To Apply

Any undergraduate student who attends an eligible school may apply if he or she is a U.S. citizen (or an eligible noncitizen), is enrolled at least half-time in school, is registered for the draft (if a male student), can demonstrate sufficient financial need, and does not owe the government a Pell grant refund or has not defaulted on a student loan. In addition, Pell grant recipients must maintain satisfactory progress throughout the year to remain eligible.

Responsible Organizations

Department of Education
Public and private schools

6. SUPPLEMENTAL SECURITY INCOME PROGRAM
(Aged, Blind, and Disabled)
=====

Authorization: Social Security Act, Title XVI

Program Administration: Federal/State
Federal Funding: 46% - 100%¹

Program Purpose

To insure a federal minimum income standard for needy aged, blind, and disabled persons. This is achieved by paying a monthly cash supplement from general revenues when their other cash benefits plus other countable income are below a federal minimum income standard, or when they have no other income.

Who Is Eligible To Apply

The eligibility of an applicant who has attained age 65, or who is blind or disabled, is determined on the basis of a monthly assessment of the individual's income and resources.

Responsible Organizations

Department of Health and Human Services
Social Security Administration

¹ States supplement this program.

7. VETERANS PENSION PROGRAM
=====

Authorization: 38 U.S.C. 511, 512, 521

Program Administration: Federal
Federal Funding: 100%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
<p>To assist needy wartime veterans whose non-service-connected disabilities are permanent and total, preventing them from pursuing a substantially gainful occupation.</p>	<p>Those veterans who have had 90 days or more of honorable active wartime service in the armed forces or, if less than 90 days of service, were released or discharged from such service because of a service-connected disability, who are permanently and totally disabled for reasons not necessarily due to service, or who are age 65 or older and not employed. Income and estate restrictions do not allow pension payments to some.</p>	<p>Veterans Administration Department of Veterans Benefits</p>

INSURANCE-BASED PROGRAMS²

8. FEDERAL CIVIL SERVICE--RETIREMENT PROGRAM³
=====

Authorization: 5 U.S.C. 8337

Program Administration: Federal
Federal Funding: 100%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
<p>To provide annuities to federal employees who are eligible to retire under immediate, optional, and deferred retirement.</p>	<p>Federal employees with a minimum of 5 years of civilian service. In addition, except for retirement because of total disability, an employee must have been subject to the retirement law for at least 1 out of the last 2 years before the separation on which retirement is based.</p>	<p>Office of Personnel Management</p>

²Although we show federal funding for insurance programs to be up to 100%, benefits are paid from contributions by or on behalf of beneficiaries, in some cases through federally established trust funds, such as social security or state unemployment compensation.

³The federal Civil Service programs are sometimes considered components of a single program; however, we considered them as individual programs.

9. FEDERAL CIVIL SERVICE--SURVIVOR BENEFITS PROGRAM

=====

Authorization: 5 U.S.C. 8341

Program Administration: Federal

Federal Funding: 100%

Program Purpose

Who Is Eligible To Apply

Responsible Organizations

To provide an annuity, payable from the civil service retirement and disability fund, to survivors designated by the federal employee.

Eligible survivors include spouses, unmarried children under 18 (or over if incapable of self-support prior to age 18), and children between the ages of 18 - 22 if enrolled full time in school.

Office of Personnel Management

10. FEDERAL CIVIL SERVICE--DISABILITY RETIREMENT PROGRAM

=====

Authorization: 5 U.S.C. 8337

Program Administration: Federal

Federal Funding: 100%

Program Purpose

Who Is Eligible To Apply

Responsible Organizations

To provide compensation to eligible federal employees who are unable to perform useful and efficient work in the grade or class of position last occupied, due to disability or injury.

To be eligible, employees must complete 5 years of creditable service under the civil service system and have become disabled because of disease or injury which impairs the ability to perform at current grade level.

Office of Personnel Management

11. MEDICARE—HOSPITAL INSURANCE PROGRAM⁴

Authorization: Social Security Act, Title XVIII

Program Administration: Federal
Federal Funding: 100%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
<p>To provide hospital insurance protection for covered services to persons age 65 and above, to certain disabled persons, and to individuals with chronic kidney disease.</p>	<p>Persons age 65 or over and qualified disabled persons. Persons 65 or over who are not eligible for cash social security benefits need some work credit to qualify for benefits; the amount of work credit depends on age. Persons under 65 who have been entitled for at least 24 months to social security disability benefits or for 29 consecutive months to railroad retirement based on disability are eligible, as are most persons in need of a kidney transplant or renal dialysis due to chronic kidney disease.</p>	<p>Department of Health and Human Services Health Care Financing Administration Contracted claims paying agents</p>

12. MEDICARE—SUPPLEMENTARY MEDICAL INSURANCE PROGRAM⁴

Authorization: Social Security Act, Title XVIII

Program Administration: Federal
Federal Funding: Up to 100%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
<p>To provide medical insurance protection for covered services to persons 65 and over, to certain disabled persons, and to individuals with chronic renal disease, who elect this coverage.</p>	<p>Persons age 65 or over who qualify for Medicare's hospital benefits may voluntarily enroll for this supplement. The enrollee must pay a monthly premium which became \$16.90 as of January 1, 1985. Some states may pay the the premium on behalf of qualifying individuals also eligible for Medicaid.</p>	<p>Department of Health and Human Services Health Care Financing Administration Contracted claims paying agents</p>

⁴These two Medicare programs are sometimes considered as components of a single program; however, we considered them as individual programs.

13. SOCIAL SECURITY--OLD-AGE INSURANCE RETIREMENT PROGRAM⁵

=====

Authorization: Social Security Act, Title II

Program Administration: Federal
Federal Funding: 100%

Program Purpose

Who Is Eligible To Apply

Responsible Organizations

To replace part of the earnings lost because of retirement.

Benefits are paid to retired workers age 62 and over, who have worked the required number of years under social security, and to certain dependents. If an eligible worker age 62 or over applies before age 65, the individual receives permanently reduced benefits. Eligible dependents include a spouse age 62 or over; a spouse at any age if caring for an eligible dependent child; and unmarried children or grandchildren who are under age 18, full-time elementary or secondary students under age 19, full-time postsecondary students under age 22 (ineligible after May 1985), or age 18 or over if disabled and disability began before age 22.

Department of Health and Human Services
Social Security Administration

⁵The Social Security programs are sometimes considered components of a single program; however, we considered them as individual programs.

14. SOCIAL SECURITY—SURVIVORS INSURANCE PROGRAM
=====

Authorization: Social Security Act, Title II

Program Administration: Federal
Federal Funding: 100%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
<p>To replace part of the earnings lost because of the entitled worker's or retiree's death.</p>	<p>Benefits are payable to the following: widows or widowers age 60 or over; surviving divorced spouses age 60 or over (married to deceased worker at least 10 yrs.); disabled widows or widowers ages 50 to 59; widows, widowers, and divorced spouses under age 60 who have minor or disabled children under their care; qualifying unmarried children or grandchildren (see discussion on p. 63); and dependent parents age 62 or over.</p>	<p>Department of Health and Human Services Social Security Administration</p>

15. SOCIAL SECURITY—DISABILITY INSURANCE PROGRAM
=====

Authorization: Social Security Act, Title II

Program Administration: Federal/State
Federal Funding: 100%

<u>Program Purpose</u>	<u>Who Is Eligible To Apply</u>	<u>Responsible Organizations</u>
<p>To replace part of the covered worker's earnings lost because of a physical or mental impairment severe enough to prevent that person from working.</p>	<p>Under the definition of disability in the Social Security Act, disability benefits are provided to a covered worker who is unable to engage in any substantial gainful activity by reason of a medically determinable physical or mental impairment that has lasted or is expected to last at least 12 months or is expected to result in death. Benefits are also paid to qualifying widows, widowers, surviving divorced spouses, and dependent children or grandchildren.</p>	<p>Department of Health and Human Services Social Security Administration State disability-determining agencies State vocational rehabilitation agencies</p>

16. STATE UNEMPLOYMENT COMPENSATION PROGRAMS

=====

Authorization: Social Security Act, Titles III, IX, and XII; Federal Unemployment Tax Act of 1939

Program Administration: State
Federal Funding: Up to 100%

Program Purpose

To provide temporary and partial wage replacement to involuntarily unemployed workers who were recently employed; to help stabilize the nation's economy during recessions.

Who Is Eligible To Apply

All workers whose employers contribute to or make payments in lieu of contributions to state unemployment trust funds; federal civilian employees; ex-service persons; "affected employees" in the Redwood industry; unemployed workers due to a presidentially declared disaster; and "adversely affected workers" under the Trade Act of 1974 are eligible--if they are involuntarily unemployed, able to work, available for work, meet state requirements, and are free from disqualification.

Responsible Organizations

Department of Labor
Employment and Training Administration
State employment agencies

17. VETERANS DISABILITY COMPENSATION PROGRAM

=====

Authorization: 38 U.S.C. 310, 331

Program Administration: Federal
Federal Funding: 100%

Program Purpose

To compensate veterans for disabilities incurred or aggravated during military service, according to the average impairment in earnings capacity such a disability would cause in a civilian occupation.

Who Is Eligible To Apply

Veterans who have suffered disabilities during service in the armed forces of the U.S. The disability must be shown to have been incurred or aggravated by service in the line of duty. Separation from service must have been under other than dishonorable conditions.

Responsible Organizations

Veterans Administration
Department of Veterans Benefits

GAO REPORTS RELATING TO ELIGIBILITY VERIFICATIONFROM 1976 TO 1984

<u>Title</u>	<u>Report number</u>	<u>Date</u>
1. Better Wage-Matching Systems and Procedures Would Enhance Food Stamp Program Integrity	RCED-84-112	09/11/84
2. HHS Needs to Determine If Massachusetts' AFDC Program Meets Federal Requirements	HRD-84-8	07/09/84
3. Federal and State Liability for Inaccurate Payments of Food Stamp, AFDC, and SSI Program Benefits	RCED-84-155	04/25/84
4. Participation in the National School Lunch Program	RCED-84-132	03/30/84
5. An Assessment of Random Audit--A New Department of Labor Program to Improve the Accuracy of Unemployment Insurance Benefit Payments	HRD-84-26	03/30/84
6. Income Analysis of Farmers Home Administration Subsidized Rural Homebuyers in 1983	RCED-84-145	03/26/84
7. Improved Administration of Special Surplus Dairy Product Distribution Program Needed	RCED-84-58	03/14/84
8. Internal Controls Can Be Improved to Help Ensure Proper and Correct Military Retirement Payments	AFMD-84-7	02/28/84
9. Computer Matches Identify Potential Unemployment Benefit Overpayments	GGD-83-99	08/24/83
10. Observations Concerning States' Implementation of the Eligibility Review Program	HRD-83-78	07/29/83
11. Massachusetts Automated Welfare Master Files Used to Administer the AFDC and Food Stamp Programs	----	07/25/83

	<u>Title</u>	<u>Report number</u>	<u>Date</u>
12.	AFDC Recipients Who Are Terminated for Not Submitting a Monthly Eligibility Report May Be Receiving Undetected Overpayments	HRD-83-70	07/20/83
13.	Military Services and VA Can Reduce Benefit Overpayments by Improving Exchange of Pay Data	AFMD-83-39	07/12/83
14.	Action Needed to Reduce, Account for, and Collect Overpayments to Federal Retirees	AFMD-83-19	06/28/83
15.	Social Security Administration Needs to Protect Against Possible Conflicts of Interest in Its Disability Programs	HRD-83-65	06/10/83
16.	Several States Have Not Properly Implemented Certain AFDC Provisions of the Omnibus Budget Reconciliation Act of 1981	HRD-83-56	06/08/83
17.	Administration of College Work-Study Program by Selected Colleges and Universities	HRD-83-61	05/23/83
18.	Problems Affecting the Accuracy and Timeliness of Employment Service Reporting Systems	HRD-83-49	04/28/83
19.	Small Percentage of Military Families Eligible for Food Stamps	FPCD-83-25	04/19/83
20.	Controls Over Foreign Students in U.S. Postsecondary Institutions Are Still Ineffective; Proposed Legislation and Regulations May Correct Problems	HRD-83-27	03/10/83
21.	Improvements Needed in the District's General Public Assistance Program	GGD-83-13	03/03/83
22.	Noncitizen Student Loan Defaults	HRD-83-29	02/07/83
23.	Need for Greater Efforts to Recover Costs of Food Stamps Obtained Through Errors or Fraud	RCED-83-40	02/04/83

	<u>Title</u>	<u>Report number</u>	<u>Date</u>
24.	Office Refurbishing, Use of a Government Vehicle and Driver, and Out-of-Town Travel by the Former Administrator of VA	HRD-83-10	01/18/83
25.	Verifying Eligibility for Military Health Care: Some Progress Has Been Made, but Reliability Problems Remain	HRD-83-1	12/01/82
26.	Department of Education Uncertain About Effectiveness of Its Special Services Program	HRD-83-13	11/12/82
27.	Federal Agencies' Unemployment Compensation Costs Can Be Reduced Through Improved Management	FPCD-83-3	10/29/82
28.	SSA Needs to Determine the Cost Effectiveness of the SSI Redetermination Process and to Implement Recommendations Made for Eliminating Erroneous Payments	HRD-82-126	09/02/82
29.	Prisoners Receiving Social Security and Other Federal Retirement, Disability, and Education Benefits	HRD-82-43	07/22/82
30.	Social Security Administration's Efforts to Reexamine the Continuing Eligibility of Disabled Persons	HRD-82-91	07/14/82
31.	Social Security's Field Office Management Can Be Improved and Millions Can Be Saved Annually Through Increased Productivity	HRD-82-47	03/19/82
32.	Millions Could Be Saved by Improving Integrity of the Food Stamp Program's Authorization-To-Participate System	CED-82-34	01/29/82
33.	Legislative and Administrative Changes to Improve Verification of Welfare Recipients' Income and Assets Could Save Millions	HRD-82-9	01/14/82
34.	Labor Needs to Improve Its Oversight of New Hampshire's Denials of Unemployment Insurance Benefits	HRD-82-10	11/10/81

	<u>Title</u>	<u>Report number</u>	<u>Date</u>
35.	Medicaid's Quality Control System Is Not Realizing Its Full Potential	HRD-82-6	10/23/81
36.	States' Efforts to Detect Duplicate Public Assistance Payments	HRD-81-133	09/17/81
37.	Perspective on Income Security and Social Services and an Agenda for Analysis	HRD-81-104	08/13/81
38.	Impact of State Death Information on Federal Income Security Programs	HRD-81-113	07/28/81
39.	Limits on Receipt of Multiple Disability Benefits Could Save Millions	HRD-81-127	07/28/81
40.	Cost of VA Medical Care to Ineligible Persons Is High and Difficult to Recover	HRD-81-77	07/02/81
41.	Fraud in Government Programs: How Extensive Is It and How Can It Be Controlled? (Volume I)	AFMD-81-57	05/07/81
42.	Analysis of a Department of Agriculture Report on Fraud and Abuse in Child Nutrition Programs	CED-81-81	03/09/81
43.	More Diligent Followup Needed to Weed Out Ineligible SSA Disability Beneficiaries	HRD-81-48	03/03/81
44.	Action Needed to Resolve Problem of Outstanding Supplemental Security Income Checks	HRD-81-58	03/03/81
45.	What Can Be Done to Check the Growth of Federal Entitlement and Indexed Spending?	PAD-81-21	03/03/81
46.	Millions Can Be Saved by Identifying Supplemental Security Income Recipients Owning Too Many Assets	HRD-81-4	02/04/81
47.	Summary of Major Deficiencies in the Farmers Home Administration's Business and Industrial Loan Program	CED-81-56	01/30/81
48.	Social Security Administration's Beneficiary Rehabilitation Program	HRD-81-22	11/10/80

	<u>Title</u>	<u>Report number</u>	<u>Date</u>
49.	VA Improved Pension Program: Some Persons Get More Than They Should and Others Less	HRD-80-61	08/06/80
50.	Better Management Information Can Be Obtained From the Quality Control System Used in the Aid to Families With Dependent Children Program	HRD-80-80	07/18/80
51.	Child Care Food Program: Better Management Will Yield Better Nutrition and Fiscal Integrity	CED-80-91	06/06/80
52.	New Legislation and Stronger Program Management Needed to Improve Effectiveness of VA's Vocational Rehabilitation Program	HRD-80-47	02/26/80
53.	State Advance Payments to Aid to Families With Dependent Children Recipients Are Inconsistent With Federal Regulations	HRD-80-50	02/07/80
54.	Changes Needed to Prevent Commuters and Transients From Receiving Supplemental Security Income	HRD-80-15	01/04/80
55.	Social Security Should Obtain and Use State Data to Verify Benefits for All Its Programs	HRD-80-4	10/16/79
56.	Controls Over Medical Examinations Necessary for the Social Security Administration to Better Determine Disability	HRD-79-119	10/09/79
57.	Social Security Student Benefits for Postsecondary Students Should Be Discontinued	HRD-79-108	08/30/79
58.	Flaws in Controls Over the Supplemental Security Income Computerized System Cause Millions in Erroneous Payments	HRD-79-104	08/09/79
59.	The Earnings Test for Social Security Beneficiaries	HRD-79-89	07/02/79

	<u>Title</u>	<u>Report number</u>	<u>Date</u>
60.	Railroad Retirement Program--How Does It Compare to Other Selected Retirement Programs?	HRD-79-41	06/08/79
61.	Review of the National Recipient System	HRD-79-88	05/29/79
62.	Letter Report on States' Procedures Used to Verify Eligibility of 18-21 Year Old Students on AFDC	----	03/08/79
63.	Erroneous Supplemental Security Income Payments Result From Problems in Processing Changes in Recipients' Circumstances	HRD-79-4	02/16/79
64.	Welfare Payments Reduced: An Improved Method for Detecting Erroneous Welfare Payments	GGD-78-107	02/05/79
65.	Integrity of Social Security Benefit Payment Systems for Dependent Children Can Be Improved	HRD-79-27	12/22/78
66.	The Need to Improve the Administrative Efficiency of the AFDC Program in Contra Costa County, California	HRD-78-159	09/05/78
67.	A Plan for Improving the Disability Determination Process by Bringing It Under Complete Federal Management Should Be Developed	HRD-78-146	08/31/78
68.	Duplicate Welfare Payments in New York Jurisdictions	HRD-78-133	06/21/78
69.	Federal Domestic Food Assistance Programs: A Time for Assessment and Change	CED-78-113	06/13/78
70.	Supplemental Security Income Quarterly Accounting Period for Determining Eligibility and Benefit Payment Amounts	HRD-78-114	05/26/78
71.	Supplemental Security Income Quality Assurance System: An Assessment of Its Problems and Potential for Reducing Erroneous Payments	HRD-77-126	05/23/78

	<u>Title</u>	<u>Report number</u>	<u>Date</u>
72.	Need for SSA to Assess Penalties Against SSI Recipients That Fail to Report Changes in Their Circumstances	HRD-78-118	05/22/78
73.	Food Stamp Work Requirements: Ineffective Paperwork or Effective Tool?	CED-78-60	04/24/78
74.	Review of the Eligibility of Persons Converted from State Disability Rolls to the Supplemental Security Income Program	HRD-78-97	04/18/78
75.	Followup on Recommendations Concerning Erroneous Aid to Families with Dependent Children Payments	HRD-78-87	03/22/78
76.	Federal Direction Needed for Educating Handicapped Children in State Schools	HRD-78-6	03/16/78
77.	Section 236 Rental Housing: An Evaluation with Lessons for the Future	PAD-78-13	01/10/78
78.	Treatment of Ineligible Veterans in VA Hospitals	HRD-77-149	09/19/77
79.	The Food Stamp Program: Overissued Benefits Not Recovered and Fraud Not Punished	CED-77-112	07/18/77
80.	Program to Pay Black Lung Benefits to Coal Miners and Their Survivors--Improvements Are Needed	HRD-77-77	07/11/77
81.	Eligibility for AFDC in Mahoning County, Ohio	HRD-77-107	06/17/77
82.	Operation Heatwave Program at Gaston Community Action, Inc.	HRD-77-100	06/07/77
83.	Effect on Medicaid of Restoring Eligibility to Those Who Lost It Because of Cost-of-Living Increases in Old-Age, Survivors, and Disability Insurance	HRD-77-88	05/20/77

<u>Title</u>	<u>Report number</u>	<u>Date</u>
84. Treatment of Ineligible Veterans in Veterans Administration Hospitals	----	05/10/77
85. Procedures for Determining Welfare Recipients' Eligibility and Payment in the District of Columbia	GGD-77-51	04/20/77
86. Testing Various Alternative Identification Requirements for Food Stamp Recipients	CED-77-53 CED-77-54	04/01/77
87. Ineffective Management of Welfare Cases Costing Millions	GGD-76-109	12/28/76
88. Survey of the Emergency Assistance to Needy Families With Children Program in New York City	----	11/19/76
89. Social Security Administration Should Provide More Management and Leadership in Determining Who is Eligible for Disability Benefits	HRD-76-105	08/17/76
90. Improvements Needed in Rehabilitating Social Security Disability Insurance Beneficiaries	MWD-76-66	05/13/76
91. Differences Identified in Five Aspects of the Food Stamp, AFDC, and SSI Programs	MWD-76-131	05/11/76
92. Controls Over Food Stamp and Welfare Programs	FGMSD-76-36	04/07/76

GAO REPORTS RELATING TO PRIVACYFROM 1976 TO 1984

<u>Title</u>	<u>Report number</u>	<u>Date</u>
1. Privacy Policy Activities of the National Telecommunications and Information Administration	GGD-84-93	08/31/84
2. GAO Observations on the Use of Tax Return Information for Verification in Entitlement Programs	HRD-84-72	06/05/84
3. Freedom of Information Act Operations at Six Department of Justice Units	GGD-83-64	05/23/83
4. Significant Improvements Seen in Efforts to Collect Debts Owed the Federal Government	AFMD-83-57	04/28/83
5. Small Computers in the Federal Government: Management Is Needed to Realize Potential and Prevent Problems	AFMD-83-36	03/08/83
6. Complete and Accurate Information Needed in Social Security's Automated Name and Number Files	HRD-82-18	04/28/82
7. Federal Information Systems Remain Highly Vulnerable to Fraudulent, Wasteful, Abusive, and Illegal Practices	MASAD-82-18	04/21/82
8. A \$4 Billion Census in 1990? Timely Decisions on Alternatives to 1980 Procedures Can Save Millions	GGD-82-13	02/22/82
9. The Reagan-Bush Transition Team's Activities at Six Selected Agencies	GGD-82-17	01/28/82
10. Estimating Paperwork and Privacy Impacts of Proposed Legislation-- A Checklist Approach	GGD-81-76	1981
11. Solving Social Security's Computer Problems: Comprehensive Corrective Action Plan and Better Management Needed	HRD-82-19	12/10/81

	<u>Title</u>	<u>Report number</u>	<u>Date</u>
12.	State Field Offices Are Not Protecting Social Security Beneficiary Information From Potential Abuse and/or Misuse	HRD-81-151	09/30/81
13.	Procedures to Safeguard Social Security Beneficiary Records Can Still Be Improved	HRD-81-157	09/30/81
14.	Concerns about HHS' Ability to Effectively Implement Incentive Funding for State Information Systems in the Aid to Families With Dependent Children Program	HRD-81-119	06/29/81
15.	Department of Agriculture Needs Leadership in Managing Its Information Resources	CED-81-116	06/19/81
16.	HHS' Action to Implement GAO's Recommendations Concerning the National Recipient System Has Been Curtailed--A New System Is Being Proposed	HRD-81-89	04/27/81
17.	Need for Improved Fiscal Controls Over the Combined Federal Campaign	AFMD-81-56	04/10/81
18.	IRS' Handling of Undelivered Income Tax Refund Checks	GGD-81-71	04/10/81
19.	Reissuing Tamper-Resistant Cards Will Not Eliminate Misuse of Social Security Numbers	HRD-81-20	12/23/80
20.	Increasing Use of Data Telecommunications Calls for Stronger Protection and Improved Economies	LCD-81-1	11/12/80
21.	U.S. Consular Services to Innocents--And Others--Abroad: A Good Job Could Be Better With a Few Changes	ID-81-9	11/06/80
22.	The Department of Housing and Urban Development's Privacy Act Systems of Records	LCD-81-10	10/31/80
23.	Disclosure and Summons Provisions of 1976 Tax Reform Act--An Analysis of Proposed Legislative Changes	GGD-80-76	06/17/80

	<u>Title</u>	<u>Report number</u>	<u>Date</u>
24.	Federal Agencies' Initial Problems With the Right to Financial Privacy Act of 1978	GGD-80-64	05/29/80
25.	U.S. Income Security System Needs Leadership, Policy, and Effective Management	HRD-80-33	02/29/80
26.	Unresolved Issues Impede Federal Debt Collection Efforts--A Status Report	CD-80-1	01/15/80
27.	Identifying Boarding Homes Housing the Needy, Aged, Blind, and Disabled: A Major Step Toward Resolving a National Problem	HRD-80-17	11/19/79
28.	An Informed Public Assures that Federal Agencies Will Better Comply with Freedom of Information/Privacy Laws	LCD-80-8	10/24/79
29.	State Programs for Delivering Title XX Social Services to Supplemental Security Income Beneficiaries Can Be Improved	HRD-79-59	04/11/79
30.	A Framework for Balancing Privacy and Accountability Needs in Evaluations of Social Research (Exposure Draft)	PAD-79-33	03/79
31.	Disclosure and Summons Provisions of 1976 Tax Reform Act--Privacy Gains with Unknown Law Enforcement Effects	GGD-78-110	03/12/79
32.	The Government Can Collect Many Delinquent Debts by Keeping Federal Tax Refunds as Offsets	FGMSD-79-19	03/12/79
33.	The Government Can Be More Productive in Collecting Its Debts by Following Commercial Practices	FGMSD-78-59	02/23/79
34.	Automated Systems Security--Federal Agencies Should Strengthen Safeguards Over Personal and Other Sensitive Data	LCD-78-123	01/23/79

APPENDIX V

APPENDIX V

<u>Title</u>	<u>Report number</u>	<u>Date</u>
35. What Are the Capabilities of the Selective Service?	FPCD-79-4	12/14/78
36. Privacy Act of 1974 Has Little Impact on Federal Contractors	LCD-78-124	11/27/78
37. Impact of the Freedom of Information and Privacy Acts on Law Enforcement Agencies	GGD-78-108	11/15/78
38. Computer Security at NASA	PSAD-78-148	09/27/78
39. Physical Security Deficiencies at the Railroad Retirement Board's Chicago Headquarters	HRD-78-162	08/29/78
40. VA's New Computer System Has Potential to Protect Privacy of Individuals Claiming Benefits	HRD-78-135	07/17/78
41. Data on Privacy Act and Freedom of Information Act Provided by Federal Law Enforcement Agencies	LCD-78-119	06/16/78
42. Procedures to Safeguard Social Security Beneficiary Records Can and Should Be Improved	HRD-78-116	06/05/78
43. Agencies' Implementation of and Compliance With the Privacy Act Can Be Improved	LCD-78-115	06/06/78
44. Timeliness and Completeness of FBI Responses to Requests Under Freedom of Information and Privacy Acts Have Improved	GGD-78-51	04/10/78
45. Challenges of Protecting Personal Information in an Expanding Federal Computer Network Environment	LCD-76-102	04/28/78
46. IRS' Proposed Computerized Tax Administration System	GGD-78-46	03/22/78
47. An Analysis of IRS' Proposed Tax Administration System: Lessons for the Future	GGD-78-43	03/01/78

<u>Title</u>	<u>Report number</u>	<u>Date</u>
48. Proposed Centralized Government Travel Agency	LCD-78-209	02/03/78
49. FBI Taking Actions to Comply With the Privacy Act	GGD-77-93	12/26/77
50. Privacy Issues and Supplemental Security Income Benefits	HRD-77-110	11/15/77
51. IRS' Security Program Requires Im- provements to Protect Confidential- ity of Income Tax Information	GGD-77-44	07/11/77
52. Lawsuits Against the Government Relating to a Bill to Amend the Privacy Act of 1974	GGD-77-21	05/06/77
53. Safeguarding Taxpayer Information-- An Evaluation of the Proposed Com- puterized Tax Administration System	LCD-76-115	01/17/77
54. Supplemental Security Income Pay- ment Errors Can Be Reduced	HRD-76-159	11/18/76
55. Managers Need to Provide Better Protection for Federal Automatic Data Processing Facilities	FGMSD-76-40	05/10/76
56. Computer-Related Crimes in Federal Programs	FGMSD-76-27	04/27/76

BIBLIOGRAPHY OF ELIGIBILITYVERIFICATION SOURCESNON-GOVERNMENT

Advanced Technology, Inc., and Westat, Inc. Development and Use of Error-Prone Models to Supplement Pre-established Criteria in Selecting Pell Grant Recipients for Validation. Rockville, MD: Advanced Technology, Inc., and Westat, Inc., 1982.

. Preliminary Report on Assessment of 1982-83 Pell Grant Validation Procedures. Rockville, MD: Advanced Technology, Inc., and Westat, Inc., 1983.

. Quality in the Basic Grant Delivery System. v. 1 and 2. Rockville, MD: Advanced Technology, Inc., and Westat, Inc., 1982.

Applied Management Sciences, Inc. Findings on School Meal Program Participation and Legislative Impact 1981-82 School Year. Washington, DC: Applied Management Sciences, Inc., 1982.

. Income Verification Pilot Project (IVPP): School Year 1981-82 In-Home Audit Findings. Washington, DC: Applied Management Sciences, Inc., 1983.

Committee for Economic Development. Improving the Public Welfare System. New York, NY: Committee for Economic Development, 1970.

Development Associates, Inc. Literature Review: Quality Assurance Procedures in Federal Entitlement Programs. Arlington, VA: Development Associates, Inc., 1982.

Fischel, Michael, and Lawrence Siegel. Computer-Aided Techniques Against Public Assistance Fraud: A Case Study of the Aid to Families with Dependent Children Program. n.p., 1980.

Income Maintenance, The National Urban League Position. New York, NY: The National Urban League, 1975.

Kirk, Irwin E., and Rita A. Barreras, SPAARS Committee and State of Colorado. Uniform Financial Measures for Use in Determining Client Eligibility Among Human Service Programs: An Impact Analysis. Denver, CO: Colorado State Department of Social Services, 1980.

Lavine, Abe. Administration of Public Welfare in the Case of Aid to Families with Dependent Children. Duke University and The Ford Foundation, 1977.

McEntee, Sheila, Alvin L. Schorr, and Marie Vesley. Fair Play. A Report of a Study of the Administration of the Aid to Families with Dependent Children in Several Midwestern States. Cleveland, OH: Case Western Reserve University, 1982.

McKinsey, Kyle S. Aid to Families with Dependent Children Verification and Fraud Detection System Description Summaries. Sacramento, CA: California Department of Social Services, 1982.

Research Triangle Institute. Error Reduction Strategies in the Food Stamp Program: Findings of the 1981 Demonstration Initiative. Research Triangle Park, NC: RTI, 1983.

SRI International. Food Stamp Error Prevention Study: Project Description. Menlo Park, CA: SRI International, 1983.

Trask, James H., and David W. Budding, Abt Associates, Inc. Working Paper on the Measurement of Administrative Performance in the Food Stamp and Aid to Families with Dependent Children Programs. Cambridge, MA: Abt Associates, Inc., 1981.

Usher, Charles L., Donna L. Watts, Dean F. Duncan. The Development and Application of Error-Prone Profiles in the Food Stamp Program. Research Triangle Park, NC: Research Triangle Institute, 1982.

GOVERNMENT

Georgia Department of Human Resources. Analysis of Local Welfare Office Administrative Procedures: The Effectiveness of Home Visitation. Atlanta, GA: Department of Human Resources, Division of Family and Children Services, 1982.

Los Angeles County Department of Public Social Services. Welfare Simplification Project. El Monte, CA: LA County Department of Public Social Services, 1979.

U.S. Department of Agriculture, Food and Nutrition Service. Semiannual Summary Report of Food Stamp Quality Control Reviews (April - September 1980). Washington, DC: USDA, 1981.

. Semiannual Summary Report of Food Stamp Quality Control Reviews (April - September 1981). Washington, DC: USDA, 1983.

U.S. Departments of Agriculture and Labor. Report to Congress: Food Stamp Workfare Demonstration Projects. Washington, DC: USDA, 1982.

U.S. Department of Health and Human Services. AFDC Information Memorandum to State Agencies Administering Approved Public Assistance Plans and Other Interested Parties. "Welfare Recipient/Bank Match Information Package." SSA-IM-83-11, Washington, DC: HHS, September 20, 1983.

. Computer-Related Fraud and Abuse in Government Agencies. Washington, DC: Office of Inspector General/HHS, 1983.

. Error Reduction in the Aid to Families with Dependent Children Program Issues and Practices. Washington, DC: HHS, 1981.

. Feasibility Study of an Integrated Computer-Based System for Eligibility Determination. v. 1, Baltimore, MD: Health Care Financing Administration/HHS, 1977.

. Profile of State Performance in the Aid to Families with Dependent Children Program for 1980. Washington, DC: Office of Family Assistance/HHS, 1983.

. Semiannual Report for October 1, 1982 - March 31, 1983. Washington, D.C.: OIG/HHS, 1983.

. Use of Income Data in Administration of the Aid to Families with Dependent Children Program. Baltimore, MD: OIG/HHS, 1978.

U.S. Department of Labor. The Development of an Operational System for Detecting Unemployment Insurance Payment Errors through Random Audits: The Results of Five Statewide Pilot Tests. Washington, DC: DOL, 1982.

U.S. Department of Labor. Employment and Training Administration. Unemployment Insurance Quality Appraisal Results for FY 1983. Washington, DC: DOL, 1983.

U.S. Office of Management and Budget. Eligibility Simplification Project: An Interagency Study with Recommendations for Simplifying Client Eligibility Among Major Public Assistance Programs. Washington, DC: OMB, 1980.

U.S. Office of Personnel Management. Final Results of Social Security Administration/Civil Service Retirement System Death Match. Washington, DC: OPM, n.d.

. Quality Assurance Review of Compensation, Report No. 29. Washington, DC: OPM, 1982.

- . Quality Assurance Review of Compensation, Report No. 30.
Washington, DC: OPM, 1983.
- U.S. President's Council on Integrity and Efficiency. Computer Matching Project to Identify and Verify Significant Under-reporting of Income in Federally Assisted Benefits Programs. Washington, DC: Office of Inspector General/USDA, 1983.
- U.S. President's Private Sector Survey on Cost Control. Report on Low Income Standards and Benefits. Washington, DC: PPSSCC, 1983.
- U.S. Social Security Administration. Aid to Families with Dependent Children Quality Control Manual. Section 3. Case Review Process. Baltimore, MD: SSA, 1980.
- . Disability Insurance Eligibility Quality Review Findings. Baltimore, MD: SSA, 1983.
- . Disability Insurance National Pilot Study II. Baltimore, MD: SSA, 1981.
- . Insurance Program Quality: Quarterly Report. Baltimore, MD: SSA, 1983.
- . Negative Bank Verification Study. New York, NY: Division of Payment and Eligibility Quality/SSA, 1981.
- . Overview: Disability Insurance National Pilot Study I (July - September 1980). Baltimore, MD: SSA, 1980.
- . Quality Control Aid to Families with Dependent Children: Detailed Statistical Tables--Findings (April - September 1981). Baltimore, MD: SSA, 1983.
- . Quality of Operations - Insurance Programs: 1982 Reconsideration Study. Baltimore, MD: SSA, 1982.
- . Report of Quality of Foreign Claims Process. Baltimore, MD: SSA, 1983.
- . Report of Quality of the Reconsideration Process in the Division of International Operations. Baltimore, MD: SSA, n.d.
- . Retirement and Survivors Insurance Quality Review Findings (April - September 1981). Baltimore, MD: SSA, n.d.
- . Retirement and Survivors Insurance Semiannual Analysis. Baltimore, MD: SSA, 1983.

. Retirement and Survivors Insurance Semiannual Analysis of the Quality of Claims and Postadjudicative Processing (June - December 1982). Baltimore, MD: SSA, 1983.

. Supplemental Security Income Quality Assurance Findings. Baltimore, MD: SSA, 1982.

U.S. Social Security Administration. Atlanta Field Assessment Office. Special Study: Analysis of Household Living Arrangement Errors (April - September 1980). Atlanta, GA: SSA, 1981.

U.S. Social Security Administration. Office of Research and Statistics. Aid to Families with Dependent Children and Related Income Maintenance Studies: Improving Interviewing in the Aid to Families with Dependent Children Program. Baltimore, MD: SSA, 1979.

BIBLIOGRAPHY OF PRIVACY, COMPUTER MATCHING,
AND COMPUTER SECURITY SOURCES

NON-GOVERNMENT

- Becker, Louise Giovane. "Get Scared." Government Data Systems, Nov./Dec. 1983, pp. 36-43.
- _____. "Computer Crime." Congressional Research Service Review, v. 4, no. 7 (1983).
- Burnham, David. The Rise of the Computer State. NY: Random House, 1983.
- Bushkin, Arthur. The Security Implications of Privacy. McLean, VA: System Development Corp., 1975.
- Bushkin, Arthur A., and Samuel Schaen. The Privacy Act of 1974: A Reference Manual for Compliance. McLean, VA: System Development Corp., 1976.
- Coalition of California Welfare Rights Organizations. Report on the Victims of the San Diego County Workfare Program. Sacramento, CA, 1984.
- Coates, Joseph F. "The Future of Computer Data Security." Vital Speeches of the Day, v. 48 (1982), pp. 280-284.
- Cohn, Arnold M. "Total Information System Security." Journal of Systems Management, v. 33 (1982), pp. 14-17.
- Dalal, Jagdish R. "Computers and the Future." Journal of Systems Management, v. 32 (1981), pp. 17-21.
- DeWeese, L. Taylor. "Giving the Computer a Conscience." Harper's, Nov. 1973, pp. 14, 16-17.
- Engelberg, Wendy. "Computing's Critical Environment." Government Data Systems, Nov./Dec. 1983, pp. 46-48.
- Faurer, Lt. General Lincoln. "The Secrets War." Government Data Systems, Nov./Dec. 1983, pp. 30-33.
- Fleming, Janice L. "Computer Matchmaking: Reviewers and Manuscripts." Environmental Science and Technology, v. 15, no. 12 (1981), p. 1395.
- "Go on Welfare Give Up Your Privacy." U.S. News and World Report, v. 82, 24 Jan. 1977, p. 83.

- Goroff, Norman N. "Social Welfare as Coercive Social Control." Journal of Sociology and Social Welfare, v. 2, Fall (1974), pp. 19-26.
- Greenberg, Myron. "Computers, Confidentiality and the Right to Privacy." In Computer Information Systems for Human Services: An Impact Analysis. v. I. Cincinnati, OH: Information System's Center, 1973, pp. 65-81.
- Hayden, Trudy, and Jack Novik. Your Rights to Privacy. NY: Avon Books, 1980.
- Hiller, Marc, and Lee F. Seidel, Ph.D. "Patient Care Management Systems, Medical Records, and Privacy: A Balancing Act." Public Health Reports, v. 97, no. 4 (July/August 1982), pp. 332-345.
- Hoffman, L. J. Modern Methods for Computer Security and Privacy. Englewood Cliffs, NJ: Prentice-Hall, Inc., 1977.
- Keisling, Phillip. "The Case Against Privacy." The Washington Monthly, May 1984, pp. 12-28.
- Kirchner, Jake. "Privacy: A History of Computer Matching in Federal Government." Computerworld, 24 Dec. 1981, pp. 1-16.
- Langan, Kenneth James. "Computer Matching Programs: A Threat to Privacy?" Columbia Journal of Law and Social Problems, v. 15 (1979), p. 15143-80.
- Laudon, Kenneth C. "Privacy and Federal Data Banks." Society, v. 17, Jan-Feb. (1980), pp. 50-56.
- Levine, Richard Steven. "Access to Confidential Welfare Records in the Course of Child Protection Proceedings." Journal of Family Law, v. 14, no. 4 (1976), pp. 535-546.
- Linowes, David F. "Must Personal Privacy Die in the Computer Age?" American Bar Association Journal, v. 65, Aug. (1979), pp. 1180-84.
- _____. "The U.S. Privacy Protection Study Commission--A Retrospective View from the Chair." American Sociological Association Annual Meeting, Canada, August 1981.
- Louis Harris and Associates. The Road After 1984: The Impact of Technology on Society. Study No. 832023. New Haven, CT: Southern New England Telephone, 1983.

- McBride, Thomas. "Computer Matching: A Potent New Government Weapon Against Fraud and Waste." Stanford Lawyer, winter, v. 17, no. 2 (1982/83), pp. 16-19.
- Martin, James. Security, Accuracy, and Privacy in Computer Systems. Englewood Cliffs, NJ: Prentice-Hall, Inc., 1973.
- Massachusetts Law Reform Institute. "Massachusetts Bank Match Program". ed. Allan Rodgers, Apr. 4, 1984.
- Murphy, Maureen, and Beverly E. Ledbetter. "Federal Legislation and Its Effect Upon University Information Systems." Cause/Effect, v. 1, no. 2 (1978), pp. 8-11.
- Noble, John H. J. "Protecting the Public's Privacy in Computerized Health and Welfare Information Systems." Social Work, v. 16, no. 1 (Jan. 1971), pp. 35-41.
- "Report of the Task Force on De-Regulation Initiatives." National Association of College and University Attorneys, 1981.
- Rule, James B. Private Lives and Public Surveillance, Social Control in the Computer Age. NY: Schocken Books, 1974.
- Rule, James, D. McAdam, L. Stearns, and D. Uglow. The Politics of Privacy. NY: Elsevier, 1980.
- Skelly, Stephen J. "Balancing Privacy and Efficiency in An Electronic World." Law and Computer Technology, v. 12, 2nd qtr. (1979), pp. 38-49.
- Smith, Robert Ellis. Privacy: How to Protect What's Left of It. NY: Anchor Press/Doubleday, 1979.
- . Compilation of State and Federal Privacy Laws, 1981. Washington, DC: Privacy Journal, 1981.
- Ungar, Sanford J. "Welfare Snoopers?" Atlantic, v. 236, Dec. (1975), p. 16.
- Weiss, Laura. "Privacy Being Invaded? Government Steps Up Use of Computer Matching to Find Fraud in Programs." Government Operations (1983), pp. 431-433.
- Workshop on Computers and Privacy in the Next Decade. Proc. of the Special Committee on the Right to Privacy of the American Federation of Information Processing Societies, edited by Lance J. Hoffman. 25-28 Feb. 1979. NY: Academic Press, 1980.

Wessel, Milton R. Freedom's Edge: The Computer Threat to Society. Menlo Park, CA: Addison Wesley, 1974.

Westin, Alan F. A Policy Analysis of Citizen Rights: Issues in Health Data Systems. Washington, DC: National Bureau of Standards, 1977.

. Computers, Health Records, and Citizen Rights. NY: Columbia Univ., 1976.

. Computer Science and Technology: Computers, Personnel Administration, and Citizen Rights. Washington, DC: National Bureau of Standards, 1979.

Westin, Alan F. and Michael A. Baker. Databanks in a Free Society. Quadrangle, NY: Times Book Co., 1972.

"Where Health-Care Safeguards Are Needed Now." U.S. News and World Report, v. 82, 24 Jan. 1977, p. 83.

GOVERNMENT

Legislative Branch

Congressional Research Service. Citizen Control Over Records Held By Third Parties. By Sarah P. Collins. Rept. no. 78-255 Gov. Washington, DC: Library of Congress, 1978.

. Computer Security: An Overview of National Concerns and Challenges. By Louise Becker. Rept. no. 83-135 SPR. Washington, DC: Library of Congress, 1983.

U.S. General Accounting Office, GAO Libraries Bibliography Services. Computer Crime and Security: An Annotated Bibliography of the Periodical Literature. Prepared by David Graham and Ulrike Richardson. Washington, DC: GAO, Sept. 1984.

U.S. House. Ad Hoc Subcommittee on Privacy and Information Systems of the Committee on Government Operations and Senate Subcommittee on Constitutional Rights of the Committee on the the Judiciary. Privacy: The Collection, Use, and Computerization of Personal Data, Part I. 93rd Cong., 2nd sess. Hearings. Washington, DC: GPO, June 1974.

U.S. House. Committee on Government Operations. Fraud and Abuse Involving Food Stamps and Other Federal Programs. 97th Cong., 1st sess. Hearings. Washington, DC: GPO, 1981.

- . Right to Privacy Proposals of the Privacy Protection Study Commission. H.R. 10076. 95th Cong., 2nd sess. Hearings. Washington, DC: GPO, 1978.
- . Who Cares About Privacy? Oversight of the Privacy Act of 1974 by the Office of Management and Budget and by the Congress. 98th Cong., 1st sess. H. Rept. 98-455. Washington, DC: GPO, 1983.
- U.S. House. Committee on Government Operations and the Senate Subcommittee on Government Information and Individual Rights of the Committee on Government Operations. Legislative History of the Privacy Act of 1974. 94th Cong., 2nd sess. Washington, DC: GPO, 1976.
- U.S. House. Subcommittee on Government Information, Justice, and Agriculture of the Committee on Government Operations. Oversight of the Privacy Act of 1974. Hearings. 98th Cong., 1st sess. Washington, DC: GPO, 1983.
- . Privacy and 1984: Public Opinions on Privacy Issues. Hearing. 98th Cong., 1st Sess. Washington, DC: GPO, 1984.
- U.S. House. Subcommittee on Transportation, Aviation and Materials of the Committee on Science and Technology. Computer and Communications Security and Privacy. Hearings. 98th Cong., 2nd sess. Washington, DC: GPO, 1983.
- . Computer and Communications Security and Privacy. Report. 98th Cong., 2nd sess. Washington, DC: GPO, 1984.
- U.S. Office of Technology Assessment. Computer-Based National Information Systems: Technology and Public Issues. Rept. no. OTA-CIT-146. Washington, DC: GPO, 1981.
- U.S. Senate. Committee on Government Operations. Computer Security in Federal Programs. Staff study. 95th Cong., 1st sess. Washington, DC: GPO 1977.
- U.S. Senate. Education Amendments of 1974. 93rd Cong., 2nd sess. Conf. Rept. 93-1026. Washington, DC: GPO, 1974.
- U.S. Senate. Permanent Subcommittee on Investigations of the Committee on Governmental Affairs. Federal Identification Fraud. Hearings. 97th Cong., 2nd sess. Washington, DC: GPO, 1982.

_____. Federal Identification Fraud. 98th Cong., 1st sess.
S. Rept. 98-84. Washington, DC: GPO, 1983.

U.S. Senate. Subcommittee on Oversight of Government Management of the Committee on Governmental Affairs. Computer Security in the Federal Government and the Private Sector. Hearings. 98th Cong., 1st sess. Washington, DC: GPO, 1983.

_____. Computer Matching: Taxpayer Records. Hearing. 98th Cong., 2nd sess. Washington, DC: GPO, 1984.

_____. Oversight of Computer Matching to Detect Fraud and Mismanagement in Government Programs. Hearings. 97th Cong., 2nd sess. Washington, DC: GPO, 1982.

Executive Branch

U.S. Commission on Federal Paperwork. Confidentiality and Privacy. Washington, DC: GPO, 1977.

_____. Final Summary Report. Washington, DC: GPO, 1977.

_____. Information Resources Management. Washington, DC: GPO, 1977.

U.S. Department of Health and Human Services. Computer Applications: Income Maintenance and Assistance, Fraud and Abuse. v. 2. Washington, DC: Office of Inspector General/HHS, 1982.

_____. Computer Applications: Federal and State Programs, Fraud and Abuse. v. 3. Washington, DC: OIG/HHS, 1982.

_____. Computer Matching in State Administered Benefit Programs: A Manager's Guide to Decision Making. Washington, DC: OIG/HHS, 1983.

_____. Computer Related Fraud and Abuse in Government Agencies. Washington, DC: OIG/HHS, 1983.

_____. Inventory of State Computer Matching Technology. Washington, DC: OIG/HHS, 1983.

_____. Semiannual Report, October 1, 1982 - March 31, 1983. Washington, DC: OIG/HHS, 1983.

U.S. Department of Health, Education and Welfare. Secretary's Advisory Committee on Automated Personal Data Systems. Records, Computers and the Rights of Citizens. Washington, DC: GPO, 1973.

U.S. Department of Labor. Inventory of Computer Matching Activities in State Labor and Related Agencies. Washington, DC: Office of Inspector General/DOL, 1982.

. "Reference Paper on Computer Matching." Washington, DC: OIG/DOL, 1982.

U.S. Internal Revenue Service. Tax Information Security Guidelines for Federal, State and Local Agencies. Pub. 1975. Washington, DC: GPO, 1983.

U.S. National Bureau of Standards. Approaches to Privacy and Security in Computer Systems. Pub. 404. Washington, DC: GPO, 1974.

. Computer Security Guidelines for Implementing the Privacy Act of 1974. Pub. 41. Washington, DC: GPO, 1975.

. Government Looks at Privacy and Security in Computer Systems. Pub. 809. Washington, DC: GPO, 1974.

. Guidelines on Computer Security Certification and Accreditation. FIPS Pub. 102. Washington, DC: GPO, 1983.

. Guidelines on Evaluation of Techniques for Automated Personal Identification. FIPS Pub. 48. Washington, DC: GPO, 1977.

U.S. Office of Management and Budget. Model Control System and Resource Document for Conducting Computer Matching Projects Involving Individual Privacy Data. Washington, DC: OMB, 1983.

. Memorandum to Executive Departments and Establishments. "Revised Supplemental Guidance for Conducting Matching Programs." M-82-5. Washington, DC, May 11, 1982.

U.S. Privacy Protection Study Commission. Personal Privacy in an Information Society. Washington, DC: GPO, 1977.

. Privacy Law in the States. Appendix 1. Washington, DC: GPO, 1977.

. The Citizen as Taxpayer. Appendix 2. Washington, DC: GPO, 1977.

. Employment Records. Appendix 3. Washington, DC: GPO, 1977.

. The Privacy Act of 1974: An Assessment. Appendix 4.
Washington, DC: GPO, 1977.

. Technology and Privacy. Appendix 5. Washington, DC:
GPO, 1977.

U.S. President's Council on Integrity and Efficiency. Federal
Employees Receiving Government Assistance. Final Rpt.
Washington, DC: Office of Inspector General/Veterans
Administration, 1983.

. Incentives and Disincentives to Computer Matching.
Washington, DC: Office of Inspector General/DOL, 1983.

. Inventory of Federal Computer Applications to Prevent/
Detect Fraud, Waste and Mismanagement. Washington, DC:
OIG/DOL, 1984.

U.S. Veterans Administration. Semiannual Report Number 9.
VA-83-7059. Washington, DC: Office of Inspector General/
VA, 1983.

**In addition to the specific sources cited above, the following
recurring publications focus on privacy or privacy-related
issues:**

Access Reports/Freedom of Information - Biweekly newsletter
published by The Washington Monitor, Inc., Washington, DC.

Computer Matching - Newsletter published by the Long Term
Computer Matching Project of the President's Council on
Integrity and Efficiency, Washington, DC.

Privacy Journal - Monthly newsletter published in
Washington, DC.

Privacy Times - Biweekly newsletter published in
Washington, DC.





30570

AN EQUAL OPPORTUNITY EMPLOYER

UNITED STATES
GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE \$300

POSTAGE AND FEES PAID
U. S. GENERAL ACCOUNTING OFFICE



THIRD CLASS

23