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1850 M Street, NW
Twelfth Floor
Washington, DC 20036
Phone: (202) 326-6000
http://www.naag.org/

December 10, 2018

Acting Commissioner Nancy A. Berryhill
Social Security Administration
1100 West High Rise
6401 Security Blvd.
Baltimore, MD 21235

Dear Acting Commissioner Berryhill:

Consumers in our respective jurisdictions continue to contact us about the growing problem of identity fraud. The fraud comes in various forms and causes various harms, including monetary loss, damage to credit score, and detriment to personal security. As both law enforcement officials and advisors to government agencies, we know the challenges of keeping government systems a step ahead of fraudulent actors. Although the challenge may be great, we urge you to prioritize making your systems as nimble and strong as possible to combat this growing problem.

In that spirit, we were pleased that a bipartisan coalition of Congress passed Section 215 of S.2155. This provision directs the Social Security Administration to develop a database to facilitate the verification of a consumer's information when requested by a certified financial institution, with the consumer's consent. This provision is aimed at addressing "synthetic identity theft," in which identity thieves use real Social Security numbers along with fictitious names and birthdates to manufacture new identities.

We ask you to evaluate and make necessary modifications to the Social Security Administration database and systems to comply promptly with this new provision of federal law. As enforcers of the data breach laws in our jurisdictions, we see the impact that exposure of Social Security Numbers can have. Our residents lose thousands of dollars a year and suffer from ruined credit scores, as well as a general sense of anxiety regarding their identity.[1]

This is especially true for some of our most vulnerable: children and new immigrants. Both share the commonality of having new Social Security numbers. However, if their newly minted Social Security numbers have already been used by a "synthetic identity thief," they have an unfair disadvantage from the moment they enter the market. Such disadvantages are compiled by many other factors for our most vulnerable. It often takes years to unwind transactions and repair credit.

[1] One study estimates that between 2014 to 2018, there will be between $4 billion and $8 billion in losses connected to synthetic identity theft problems alone. Javelin Strategy & Research, *2015 Data Breach Fraud Impact Report,* June 2015.

Thus, we urge you to prioritize the verification systems to accept electronic signatures or other verified methods so that financial institutions and others can quickly verify identity, or flag identity theft in real-time.

Having a nimble system to respond to warning signs of identity theft, and to prevent theft from happening in the first place, is not only good government, it is good service to some of the most vulnerable members of the public.

Sincerely,

Derek Schmidt
Kansas Attorney General

Ellen F. Rosenblum
Oregon Attorney General

Steve Marshall
Alabama Attorney General

Leslie Rutledge
Arkansas Attorney General

California Attorney General

Colorado Attorney General

George Jepsen
Connecticut Attorney General

Matthew P. Denn
Delaware Attorney General

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District of Columbia Attorney General

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Pennsylvania Attorney General

Peter F. Kilmartin
Rhode Island Attorney General

South Dakota Attorney General

Tennessee Attorney General

Ken Paxton
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Utah Attorney General

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Washington Attorney General

Patrick Morrisey
l

Brad Schimel
Wisconsin Attorney General

Wyoming Attorney General