JUNE GIBBS BROWN
Inspector General

SEPTEMBER 2000
0E1-07-99-00570
OFFICE OF INSPECTOR GENERAL

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OEI's Region VII, Kansas City office prepared this report under the direction of James H. Wolf, Regional Inspector General, and Brian Pattison, Deputy Regional Inspector General. Principal OEI staff included:

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<th>HEADQUARTERS</th>
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http://www.hhs.gov/oig/oei/
EXECUTIVE SUMMARY

PURPOSE

To provide an update on the nature and extent of birth certificate fraud.

BACKGROUND

Legitimate birth certificates provide vital information about the person whose name appears on the certificate. Issuing birth certificates is the responsibility of State vital records registrars and numerous local issuing entities. While originally intended for the sole purpose of birth registration, birth certificates are now used extensively for employment purposes and to obtain benefits or other documents used for identification.

Over the last 25 years, a number of studies have addressed problems related to false identification and the misuse of birth certificates. These studies conclude that false identification is a major factor in crime, and that most, if not all, Federal fugitives and drug trafficking crimes are associated with false identification. They also conclude that stolen, counterfeit, and altered birth certificates are often used as “breeder documents” that allow the holder to obtain documents needed to create new identities. The Office of Inspector General has conducted three inspections focused specifically on birth certificate fraud that identified a number of vulnerabilities in birth certificate processes. Because so many Federal and State agencies rely on birth certificates to assist them in determining eligibility for services and benefits, it is important that these agencies have current information on the nature and extent of birth certificate fraud to assist them in the proper assignment and protection of benefits.

This inspection was initiated at the request of the Department of Health and Human Services to provide information which the Department could use in responding to responsibilities placed on it as a result of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996.

We used two mechanisms to gather information. We gathered general information regarding vital records policies and procedures from 53 primary vital records registrars using mail surveys. We also collected more in-depth information through personal interviews with State registrars, fraud investigators, and local and State vital records, Passport Services, Immigration and Naturalization Services, Social Security Administration, and public assistance staff in five States and New York City. We also met with the Center for Disease Control and Prevention (CDC), National Center for Health Statistics, staff who provided us with comments on the draft of this report.

FINDINGS

Fundamental, Irreconcilable Conflicts Surround Birth Certificate Purposes and Uses

A certified copy of a birth certificate is proof only that a birth occurred and was recorded. For that purpose, it may be desirable that the public be allowed easy access to them. However, the agencies and organizations that use birth certificates as proof of
identification for employment purposes, to obtain benefits or other documents (e.g., driver’s licenses, Social Security cards, and passports), and to assist them in determining eligibility for public assistance and other benefits, may have concerns with how easily certified copies of birth certificates can be obtained. These conflicting perspectives are at the very heart of the birth certificate controversy.

**Birth Certificates Continue to be Used as “Breeder Documents” and are Easy to Obtain**

Virtually all Federal and State agencies agree that fraudulent birth certificates are used as “breeder documents” to obtain the genuine documents needed to create new identities, and that fraudulent birth certificates are easy to obtain. Factors which contribute to their use as “breeder documents” include the following:

- currently, 6,422 different entities issue birth certificates. This large number of State, county, city, township, and other entities that issue birth certificates increases opportunities for fraud, theft, bribery, and other methods of illegally obtaining birth certificates;

- thirteen States allow “open” access to birth records, which allows virtually anyone to purchase copies of any birth certificates on file; and

- birth certificates can be purchased without identification from some vital records offices and issuing entities.

**Birth Certificate Fraud is Hard to Detect**

Many altered or counterfeit birth certificates and genuine birth certificates held by imposters may go undetected. The reasons why these fraudulent birth certificates are hard to detect include the following:

- over 14,000 different versions of birth certificates are in circulation;

- nearly 4 million United States births were registered in 1999;

- security features contained in the paper used to issue birth certificates, as well as formats and signatures, vary among State vital records offices and the many local entities issuing them;

- technological advances in the Internet, scanners, color printers, and copiers make it easier to obtain genuine birth certificates and create counterfeit ones;

- between 85 and 90 percent of the birth certificate fraud encountered by the Immigration and Naturalization Services and Passport Services staff is the result of genuine birth certificates held by imposters -- the most difficult fraud to detect; and

- Federal and State agency staff report receiving only limited training focused on the detection of fraudulent birth certificates.
State Practices Create Opportunities for Fraud

It was the consensus of those we interviewed that a number of State practices create opportunities for fraud. Those practices include the following:

- *delayed, amended, and midwife birth registrations* that are based on affidavits of personal knowledge, include no documentary evidence, and are not often marked or overlaid accordingly;

- *delays in matching death and birth records* can make the identities of many deceased persons easy to assume between the time the person dies and the time the death and birth records are matched;

- questionable *physical security* situations that create opportunities for fraud; and

- *limited oversight* of local issuing entities by State vital records offices.

Birth Certificate Fraud is Seldom Prosecuted

Virtually all of the Federal and State agency staff we talked with indicate birth certificate fraud is seldom prosecuted unless it can be linked to large dollar losses or other punishable crimes. Most staff also indicate that many prosecutors are reluctant, or refuse to take birth certificate fraud cases in which the only charge is attempting to obtain another individual’s birth certificate, or counterfeiting or altering a birth certificate. At the same time, misconceptions exist surrounding the security and integrity of birth certificates.

CONCLUSIONS

Birth Certificates Alone do not Provide Conclusive or Reliable Proof of Identity

Many agencies and organizations request that individuals provide their birth certificates to receive a benefit or service, or to support the issuance of other documents often used for identity purposes (e.g., driver’s license). However, agencies who rely on birth certificates as a means of establishing identity must understand the limitations of accepting a birth certificate as proof of age, citizenship, or identity. For example, genuine documents obtained with counterfeit birth certificates can be used to obtain genuine birth certificates. Thus, it is inherently illogical to require someone to prove their identity using potentially fraudulent identity documents spawned by false birth certificates in order to obtain a birth certificate.

Further, it would be Impractical to Redesign Birth Certificates to Make them Reliable Identification Documents in and of Themselves

Efforts to make the birth certificate into a reliable identity document are complicated by the more than 14,000 different legitimate versions in existence, and the more than 6,000 entities which issue them and the processes they use to do so. Efforts are also complicated by the ease with which birth certificates can legitimately be obtained and counterfeited, and the fact that the majority of fraud is now being committed by imposters.
using genuine birth certificates. Also, any changes to the birth certificate itself will take essentially a lifetime to become effective.

**Some Efforts to Redesign Birth Certificates Might Even be Undesirable**

The primary purpose for which birth certificates were created -- to document and record births -- is served well by the large number of entities that issue them and the technology which makes them readily and quickly available. Because redesigning birth certificates could jeopardize their availability, to do so might be undesirable. Unfortunately, that availability contributes to fraud and the unreliability of birth certificates as identification documents.

**Nevertheless, Since Birth Certificates can Play an Important Role in Establishing Identity, Their Integrity Should be Improved**

When used in combination with other documents, birth certificates can add to the level of proof in establishing eligibility and identity. As noted previously, many agencies use them in this way. Therefore, it is important that the processes used to issue birth certificates be standardized and recent advances in technology utilized to ensure birth certificate integrity parallels that of other identification documents. It is also important that user agencies be vigilant in their detection of fraudulent documents and documents held by imposters. We have included consensus suggestions for improving the birth certificate process and the detection of fraud in the body of the report.

**In Addition, Federal and State Program Administrators Should Assess the Proofs of Identity They Will Accept**

Even if their security is improved, birth certificates may still not be the best proof of identity. For this reason, program administrators may not want to use birth certificates at all, or use them only with other documents, as noted above. Agencies need to specify documents and methods of proving identity (e.g., fingerprints, testimony of relatives) they will accept in determining eligibility for services. Given what we have learned, if program administrators continue to include birth certificates in the proofs of identity they will accept, they should also reconsider what steps they will take to detect fraudulent certificates and to secure valid ones.
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INTRODUCTION

PURPOSE

To provide an update on the nature and extent of birth certificate fraud.

BACKGROUND

The Birth Certificate Process

Legitimate birth certificates provide vital information about the person whose name appears on the certificate (i.e., legal proof of parentage, citizenship, date, place, and time of birth). While originally intended for those purposes, their role has evolved to the point where they are now used extensively for employment purposes and to obtain benefits or other documents (e.g., driver’s licenses, Social Security cards, passports, State identification documents). The issuance of birth certificates in the United States is the responsibility of 57 State vital records registrars and numerous other entities assigned vital records responsibility.

No Federal requirements exist regarding the reporting and collection of birth certificate information. However, the 1992 Model State Vital Statistics Act and Regulations published by the National Center for Health Statistics within the Centers for Disease Control and Prevention (CDC) state that “Even though the legal responsibility for the registration of vital records rests with the individual States, the States and the National Center for Health Statistics (the Federal partner) work together to build a uniform system that produces records to satisfy the legal requirements of individuals and their families and also to meet statistical and research needs at the local, State, and national levels. The cooperation includes the development and promotion of standard certificates and reporting forms, training and quality control programs, and model legislation.” The information contained on birth certificates is the basis for the vital record information reported to the National Center for Health Statistics by State vital records registrars. States report vital records information without names to the National Center for Health Statistics for research and statistical purposes.

Previous Reports on Birth Certificate Fraud

Federal Advisory Committee on False Identification - Problems related to false identification and misuse of birth certificates have been addressed in a number of studies conducted over the last 25 years. In 1974, the Federal Advisory Committee on False Identification (FACFI), commissioned by the Attorney General of the United States, recognized the criminal use of false identification documents. In its 1976 report entitled
The Criminal Use of False Identification, the committee concluded that 100 percent of all Federal fugitives and 80 percent of all drug trafficking are associated with false identification. They also reported that false identification is a major factor in crime, including illegal immigration and flight from justice, and that falsified or stolen vital statistics (i.e., birth certificates) are used as “breeder documents.” (“Breeder documents” refer to documents that allow the holder to obtain other documents -- passports, driver’s licenses, etc. -- and benefits, such as resident status, Social Security benefits, loans, and other government aid, including Temporary Assistance to Needy Families, Food Stamps, and Medicaid). The Federal Advisory Committee also issued a supplemental report entitled A Plan for Reducing the Abuse of Birth Certification. In 1984, the Laws at Work Task Force, co-chaired by top HHS officials, issued a report entitled A Report of the Task Force on Criminal Implications of False Identification. These two reports on false identification have findings similar to the 1976 report.

National Association for Vital Records - In 1995, the National Association for Vital Records and Health Statistics (now called the National Association for Public Health Statistics and Information Systems), issued a staff report identifying many of the same problems associated with birth certificate fraud. They recommended uniformity and standardization of the forms and paper used to issue certified copies of birth certificates and further suggested that more resources be directed toward matching death and birth information.

Office of Inspector General - The Office of Inspector General (OIG) conducted two inspections focused specifically on birth certificate fraud (Birth Certificate Fraud, OAI-86-02-00001, March 1988, and Birth Certificate Fraud Update - A Management Advisory Report, OEI-02-91-01530, December 1991). The OIG also issued a third report (Citizenship and Alien Verification - Information, September 1996) in which birth certificates were discussed. The first inspection identified vulnerabilities in the birth certificate process, the many forms of birth certificates in existence, and issuance procedures. The report recommended both interstate and intrastate standardization of birth certificates, minimum security standards, and improvements in matching death and birth records, and further recommended that States work cooperatively with the Social Security Administration (SSA) to establish procedures to issue Social Security numbers to infants at birth. The second inspection was conducted in response to a request from the Commissioner of the Social Security Administration and summarized SSA’s efforts to control birth certificate fraud, which included verification of United States Virgin Island birth certificates and assignment of Social Security numbers at birth. In this study, we found the nature and extent of birth certificate fraud relatively unchanged since 1988 and that major weaknesses continued to hamper the reliability of birth certificates as evidence of eligibility for program services and benefits, even though some incremental improvements had been made. We reported the same problems and weaknesses in our 1996 report.
This Inquiry

This inspection was initiated at the request of the Department of Health and Human Services in the fall of 1999. The Department requested that the OIG provide information that the Department could use in responding to responsibilities placed on it as a result of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996. More specifically, the Act requires the Secretary to “submit a report to Congress on ways to reduce the fraudulent obtaining and use of birth certificates.” This inspection focuses on the processes of issuing and fraud associated with certified copies of birth certificates. The OIG was asked to provide this information because of our previous work in the area of birth certificate fraud at a time when the SSA was located within the Department, and because public assistance programs currently funded by the Department still rely on birth certificates as one proof of identification in determining eligibility. Further, because so many State and Federal agencies rely on birth certificates in determining eligibility for services and benefits, we feel it is important that they have current information regarding the status of birth certificate fraud.

METHODOLOGY

We used two mechanisms to conduct this inspection. We first solicited information from the 57 primary vital records offices (50 States, Guam, Puerto Rico, United States Virgin Islands, American Samoa, Commonwealth of the Northern Mariana Islands, New York City, and Washington, DC) using mail surveys. This enabled us to quickly gather general information regarding vital records policies and procedures; security measures in place to protect against birth certificate fraud; coordination with other agencies; and enforcement penalties for committing identity fraud. Of the 57 surveys mailed, 53 were completed and returned. We received completed surveys from vital records registrars in each of the 50 States, and New York City, Washington, DC, and Puerto Rico. We did not receive completed surveys from American Samoa, Commonwealth of the Northern Mariana Islands, Guam, or the United States Virgin Islands.

We selected six locations -- five States (California, Florida, Massachusetts, New Mexico, and Texas) and New York City -- for additional data collection. Of these States, 4 were among the 11 States included in the 1988 and 1991 OIG inspections, as was New York City. The original 11 sites were selected because they represent states with large cities, cities that serve as major ports, or cities along the United States-Mexico border where birth certificate fraud was more concentrated. Because we believe this premise remains valid, we included some of these same States in this study. We included New Mexico based on information obtained from State registrars, the Immigration and Naturalization Service, and the National Center for Health Statistics during preinspection. The locations selected represent a mix of States with “open” and “restricted” (limited) public access to records, and include various geographic regions.
In the six locations, we collected more in-depth information about the coordination between agencies, matching death registration and birth certificates, security measures, enforcement, and the effects of new technology on birth certificate fraud. This information was obtained through personal interviews with State registrars, fraud investigators, local and State vital records agency staff, and local and State Temporary Assistance for Needy Families agency staff. We also collected information from the Departments of Motor Vehicles and Food Stamps staffs who require birth certificates as proof of eligibility for program services or benefits, and officials from SSA, Immigration and Naturalization Service, and State Department’s Passport Services. We also met with the Center for Disease Control and Prevention, National Center for Health Statistics staff who provided us with comments on the draft of this report.

We conducted this inspection in accordance with the *Quality Standards for Inspections* issued by the President’s Council on Integrity and Efficiency.
In conducting this inspection, we heard many stories of people whose lives have been adversely affected by birth certificate fraud -- people who were personally victimized by stolen identities and suffered financial ruin. Others stories were more far-reaching, describing the criminal use of fraudulent birth certificates to evade law enforcement for crimes already committed, commit bank or credit card fraud, or obtain services and benefits for which individuals were not entitled. We also heard stories about fraudulent birth certificates used by terrorists and drug traffickers to acquire passports for international travel, and by illegal aliens attempting to avoid detection and deportation. The common threads running through each of these stories are 1) fraudulent birth certificates were involved, 2) most false identity crimes go undetected, 3) once detected, few false identity crimes are successfully prosecuted, and ultimately, 4) each one of us is affected by birth certificate fraud every day.

Recent Congressional and media attention on the subjects of identity theft and the sale of false identification documents via the Internet, and the statements of State and Federal staff with whom we spoke, reflect concerns regarding the fraudulent use of birth certificates. Virtually everyone with whom we spoke indicated that they believe birth certificate fraud is increasing, and 34 State registrars responded in the survey that birth certificate fraud has increased in the last 10 years.

To this end, the primary focus of this report and the majority of our findings address the status of birth certificate fraud. However, one of our most striking findings is related to the disconnect between the intended purposes of birth certificates and the purposes for which they are used.

**Fundamental, Irreconcilable Conflicts Surround Birth Certificate Purposes and Uses**

**A Birth Certificate is Proof Only that a Birth Occurred and was Recorded.** It is important to recall the intended purpose of a birth certificate -- to certify that a birth was documented and recorded. For that purpose, it is not unreasonable that State laws allow public access to these records. Efforts to restrict access to birth certificates would diminish their value for the purpose they were originally designed to serve.

**However, Birth Certificates are Used as Proof of Age, Citizenship, and Identity.** Birth certificates are widely recognized as proof of age, place of birth, and identity. They are also used extensively for employment purposes, to obtain benefits or other documents (e.g., driver’s licenses, Social Security cards, and passports), to assist in determining eligibility for public assistance and other benefits, to enroll children in school, and as proof of age eligibility for sports and other age restricted activities. However, because
they were never designed to provide sole proof of identity, and because a birth certificate cannot be positively linked with an individual, their use for that purpose is questionable.

**Concerns about Birth Certificates are Largely the Result of Conflicting Perspectives.** The key to understanding the conflicts between the goals of State and local entities who register births and issue birth certificates and agencies and organizations that rely on birth certificates as proof of identification is understanding and interpreting individual perspectives. For example, those seeking access to public records may look favorably on vital records offices’ efforts to make it easier to request and obtain birth certificates, while those using birth certificates for identity purposes may have concerns with how easily certified copies of birth certificates can be obtained.

These varying perspectives are at the very heart of the birth certificate controversy and should be kept in mind as you read the following findings related to birth certificate fraud.

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**Birth Certificates Continue to be Used as “Breeder Documents” and Are Easy to Obtain**

As we previously reported in 1988, 1991, and 1996, birth certificates continue to be used as “breeder documents” from which other supporting documents can be secured to alter identities and fraudulently obtain services and benefits. Virtually all Federal and State agencies agree that fraudulent birth certificates are used to obtain genuine documents, and in concert with other fraudulent documents, to create new identities. The perpetrator usually begins with a purchased, stolen, counterfeit, or altered birth certificate. The birth certificate is then used as the basic evidence of age, citizenship, and identity to seek and obtain other documents and/or benefits.

Birth Certificate ➔ Social Security Card ➔ Driver’s License

= Services/Benefits/Credit/Crime

The following two instances demonstrate how birth certificates have provided the basis for improper program payments.

A joint investigation conducted by the Assistant U.S. Attorney for the Southern District of Texas in cooperation with the Immigration and Naturalization Services, Social Security Administration, public assistance, Food Stamps, U.S. Postal Service, and Secret Service identified 100 cases in which fraudulent birth certificates had been used to obtain public assistance, Food Stamps, and Medicaid benefits totaling $514,741.1

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1 Source: Texas Department of Human Services, Office of Inspector General
In another case, fraudulent birth certificates found at the scene of an automobile accident were linked to $1 million in public assistance and Food Stamps fraud. Some of the birth certificates used to obtain these services were genuine documents that had been sold by the persons whose names appeared on them. Others were counterfeit documents printed on genuine birth certificate banknote paper used by one State’s vital records office, which investigators suspect were acquired as “part of an inside job.” Staff interviewed in a public assistance agency referred to the children created to obtain these services as “paper babies” because they exist only on paper, for the sole purpose of fraudulently obtaining benefits.  

The first step in understanding why birth certificates are easy to obtain, thus making them useful as “breeder documents,” is to understand how they are issued. It is also important to know that the issuance of birth certificates varies from State to State and can vary within States. Factors which contribute to the continued use of birth certificates as “breeder documents,” and that remain relatively unchanged since our earlier reports are as follows.

Currently, 6,422 Entities Issue Birth Certificates. The majority of States use a decentralized approach for issuing birth certificates, relying on local offices over which they have limited control. In 39 States and Puerto Rico, birth certificates are issued by a number of local vital records registrars and other officials (e.g., county clerks, justices of the peace, mayors) in county, city, and township offices in addition to the State vital records office. Only 11 States, Washington, DC, and New York City use a centralized operation for issuing birth certificates.

The large number of locations issuing birth certificates potentially increases the opportunities for fraud, theft, bribery, or other methods to illegally obtain birth certificates. In total, the registrars responding to our survey report 6,417 different locations where birth certificates can be issued. The National Center for Health Statistics indicates an additional five entities issue birth certificates within the jurisdictions of the four primary vital registrars that did not respond to our survey. A chart outlining the reported number of locations where birth certificates are issued in each State, New York City, Washington, DC, and Puerto Rico is located in Appendix A.

Most State and county issuing offices are located within the auspices of their respective health departments. The sale of birth certificates serves as source of revenue for States and the only source of revenue for some State health departments, thus creating no disincentive for issuing birth certificates. The sale of birth certificates can serve also as a major source of revenue for many local offices. For these departments and offices, restrictions on the issuance of birth certificates could adversely affect revenues.

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2 Source: Kansas Department of Health and Environment, Center for Health and Environmental Statistics, Office of Vital Statistics
**Some States Allow “Open” Access to Birth Records.** In 36 States, New York City, Washington, DC, and Puerto Rico, access to birth records is considered “restricted.” In these locations only the person listed on the birth certificate and others designated for access by State or local governments (e.g., parent, child, sibling, grandparent, or others who demonstrate a direct and tangible interest) can obtain certified copies of a birth certificate. However, in 14 States, public access to birth records is “open” at the State or local level, and virtually anyone can review birth records or purchase a copy of any birth certificate from issuing entities as long as they know the name and birth date of the person listed on the birth certificate. There are 2,375 such “open” access locations in these States, which account for 37 percent of the 6,422 issuing offices nationwide.

- Ten of the 14 States allow “open” access at both the State and local levels and treat requests for birth certificates the same in all locations.
- Two States allow “open” access at the State level, but allows only “restricted” access in all local offices within the State.
- Two States allow only “restricted” public access to birth records at the State level, but “open” at the local level. They allow birth registration indexes and/or actual birth certificates to be openly viewed in local offices and thus provide enough information to request copies of certificates from the State registrar’s office.

We have identified “open” access at both the State and local level, and the number of issuing offices in each of those States, in the following chart.

### Open Access to Vital Records

<table>
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<tr>
<th>State</th>
<th>Issuing Entities</th>
<th>Total Number of Issuing Offices</th>
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<tbody>
<tr>
<td></td>
<td>State Level</td>
<td>Local Level</td>
</tr>
<tr>
<td>California</td>
<td>✔</td>
<td>✔</td>
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<tr>
<td>Iowa</td>
<td>✔</td>
<td>✔</td>
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<tr>
<td>Kentucky</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Maine</td>
<td>✔</td>
<td>✔</td>
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<tr>
<td>Massachusetts</td>
<td>✔</td>
<td>✔</td>
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<tr>
<td>Minnesota</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>New Jersey</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>North Carolina</td>
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<td>✔</td>
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<tr>
<td>Ohio</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>South Dakota</td>
<td>✔</td>
<td>✔</td>
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<tr>
<td>Tennessee</td>
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<td>✔</td>
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<tr>
<td>Vermont</td>
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<tr>
<td>Washington</td>
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<td>✔</td>
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<tr>
<td>Wisconsin</td>
<td>✔</td>
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2,375
Copies of birth certificates can be obtained from primary vital records offices and local entities by using a variety of methods. With the exception of California, all of the responding primary vital records registrars indicate birth certificates can be obtained from their offices on a “walk-in” basis. All 53 State vital records offices and local offices in 34 States also issue birth certificates in response to requests they receive in the mail. Thirty-eight primary offices and an unknown number of local offices in seven States also allow credit card purchases of birth certificates based on telephone requests. Birth certificates can also be purchased through the Internet in 29 States, and from an unknown number of local offices.

**Proof of Identification Is Not Always Required to Obtain Copies of Birth Certificates.** Proof of identification is required for walk-in requests in only 30 primary vital records offices and local offices in 19 States. In addition, only 11 States require persons to provide proof of identification when requesting copies of birth certificates by mail. Local offices in fewer States (7) require proof of identification for mail requests. Even fewer primary and local offices request proof of identification for Internet and facsimile requests as indicated in the following chart.

<table>
<thead>
<tr>
<th>Type of Request</th>
<th>State Accept/Require ID</th>
<th>Local Accept/Require ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walk-in</td>
<td>52/30</td>
<td>39/19</td>
</tr>
<tr>
<td>Phone/Credit Card</td>
<td>38/7</td>
<td>10/1</td>
</tr>
<tr>
<td>Mail/Check or Money Order</td>
<td>53/11</td>
<td>34/7</td>
</tr>
<tr>
<td>Mail/Credit Card</td>
<td>22/2</td>
<td>8/2</td>
</tr>
<tr>
<td>Internet/Credit Card</td>
<td>29/5</td>
<td>3/2</td>
</tr>
<tr>
<td>Facsimile/Credit Card</td>
<td>41/9</td>
<td>10/2</td>
</tr>
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</table>

When asked what they consider acceptable forms of identification, the registrars interviewed said they would prefer a driver’s license or State issued identification card as proof of identity, but some indicated they would also accept identification documents with “any type of control number” (e.g., employment badges, library cards, bus passes) or utility bills as proof of identification. We also learned the laws in one “open access” State (California) prohibit issuing offices from asking for identification. As long as the person requesting the birth certificate can provide the required information (i.e., name, date of birth), he or she can obtain a certified copy of a birth certificate. In addition to the lack of identification documents, 43 States also have no limits on the number of copies of birth certificates that can be purchased, and 31 States have no restrictions on the age of persons to whom they will sell birth certificates. The lack of restrictions make it easier to perpetrate systematic fraud.
Fraudulent Birth Certificates are Hard to Detect

With the exception of detection by highly trained Immigration and Naturalization Services and Passport Services staff, information we obtained indicates many altered or counterfeit birth certificates and genuine birth certificates held by imposters may go undetected. Officials who use birth certificates to determine eligibility for services and benefits say they fail to detect many fraudulent documents, and the ones they do detect are “only the tip of the iceberg.” In attempting to identify fraudulent birth certificates, SSA, public assistance, Department of Motor Vehicles, and some Immigration and Naturalization Service staff indicate their efforts to detect fraudulent birth certificates focus only on obvious alterations, such as erasures, smudges, white-out, misspelled words, offset margins, poor seals, dates that do not match, or photocopies. However, information we obtained indicates birth certificates are vulnerable to fraud beyond the obvious in the following areas.

The Large Number of Legitimate Birth Certificates in Circulation Make Fraud Detection Difficult. Staff at the Immigration and Naturalization Service’s Forensics Document Laboratory\(^3\) estimate more than 14,000 different versions of legitimate birth certificates currently exist. The number of different versions is the result of the more than 6,000 entities issuing birth certificates using different formats, types of paper, and different signatures (e.g., State registrars, county registrars, or clerks, mayors, and justices of the peace). Once a birth certificate is issued, it never expires, meaning that security features added to new birth certificates will offer no protection against fraud in previously issued birth certificates. The National Center for Health Statistics reports that 3,957,829 United States births were registered in 1999.

In addition, responses to our survey revealed State vital records offices currently issue 113 different types of certified copies of birth records. This number does not account for the number of variations in local office issuance. Fifty-one of the 53 primary vital records offices issue certified photocopies of actual birth records, 37 issue certified copies of computerized abstracts of birth records, 17 issue wallet-sized birth certificates/cards, and 8 issue commemorative birth certificates, each with their own unique security features and signatures. In addition, survey respondents report that, in 20 States, local entities issue full photocopies of actual birth records, 16 States’ local entities issue certified copies from computerized abstracts, 17 States’ local entities issue wallet-sized certificates, and 4 States’ local entities can issue commemorative birth certificates.

Differences in Paper, Security Features, Formats, and Signatures Make Fraudulent Birth Certificates Hard to Detect. All State vital records offices issue birth certificates on security paper, but the security features vary from State-to-State. Some local offices

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\(^3\) The Forensics Document Laboratory provides a wide variety of forensic document analysis and law enforcement services for the Immigration and Naturalization Services and other Federal, State, and local law enforcement agencies. It also develops and presents training programs in the detection of fraudulent documents, assists in identifying fraudulent documents, and acts as a liaison in promoting common efforts to combat international document fraud.
also issue birth certificates on security paper, but in 14 of the local offices with local
issuance they use different security paper than the State vital records office. (One local
office we visited issues birth certificates on plain white bond paper.) The security features
most often used by both State and local offices are serial numbers, watermarks, and micro-
line printing. Other paper security features used include intaglio and steel-engraved
borders, ultraviolet ink, security threads, substrate paper or ink, hidden voids, and latent
images. A chart outlining the security features contained in the paper used by State vital
records registrars is located in Appendix B.

Adding to the potential number of different types of valid birth certificates in existence is
the unknown number of changes in paper used to issue birth certificates, the number of
different formats used, and the number of different registrars’ signatures that have
appeared on birth certificates since the birth registration began in most States in the early
1900's. State registrars interviewed estimate periodic changes in paper and/or formats
occur every 8 to 10 years, and that registrar signatures could change more frequently,
especially when registrars are local elected officials (e.g., county clerks, mayors). States
and local offices also make changes in the vendors from whom they purchase their security
paper. Some change vendors annually because State laws require that they purchase from
the lowest bidder. Local offices also make periodic changes in the vendors from whom
they order their security paper, and many order paper based on State issued specifications,
but not from the same vendor used by the State.

Technological Advances Make Counterfeit Birth Certificates Easy to Create and
Hard to Detect. Advances in communication (e.g., the Internet) and technologies
(e.g., scanners, color printers and copiers) make it easier to obtain genuine birth
certificates fraudulently or to create fraudulent birth certificates. These technological
advances render the once standard methods of detecting fraudulent documents generally
ineffective. With the exception of one public assistance office, which requires every
applicant to be fingerprinted, virtually everyone we talked with says technology has made
birth certificate fraud more likely. This is supported by the 27 primary vital records
registrars responding to our survey who also say that technology has created new
opportunities for fraud.

Our discussions also reveal that technology has made birth certificates the “path of least
resistance” because, as other departments and agencies have increased the security
features in their documents (e.g., Social Security cards, driver’s licenses, and immigration
documents), less secure birth certificates have been targeted for counterfeiting. As
previously noted, counterfeit birth certificates are then used to obtain genuine Social
Security cards, driver’s licenses, and, ultimately, new identities. With each genuine
document acquired, a person’s new identity becomes harder to detect.

Information available through the Internet poses a significant security risk to the integrity
of birth certificates. Not only are birth certificates available through the Internet, but the
vital statistics necessary to request some birth certificates can be found using the Internet
as well. Some vital records offices also post indexes, containing the names and birth dates
of people for whom they have registered births, on their websites.
At least one local vital records office, at one time, posted scanned copies of actual birth certificates on their website. Many hospitals also have established websites where they post newborn information, and independent companies offer websites that allow parents to share their newborn’s vital records information with anyone who accesses the site. We found many websites offering information to assist in creating new identities and websites offering “novelty” fake identification (many of which include birth certificates, Social Security cards, and driver’s licenses). Federal and State staff we spoke with said the price “on-the-street” for a new identity, which includes a birth certificate, and often a driver’s license and Social Security card, is between $500 and $1,200.

Most Birth Certificate Fraud is Committed Using Genuine Documents. An alarming fact is that most of the fraudulent documents identified by Immigration and Naturalization Services staff are genuine documents held by imposters, the most difficult frauds to detect. For example, staff in the El Paso Intelligence Center\(^4\) indicate that 90 percent of the false claims cases they see involve bonafide birth certificates held by imposters. Passport Services staff report parallel statistics, stating that 85 percent of the birth certificate fraud they encounter also is the result of genuine birth certificates held by imposters. Further, vital records registrars responding to our survey indicate they have encountered persons impersonating others to obtain genuine copies of those persons’ birth certificates, individuals who had purchased birth certificates from the persons’ named on the birth certificate, and persons who had stolen or acquired stolen birth certificates.

Federal and State agency staff say genuine documents held by imposters are difficult to detect. They also note that increased customer service is impacting their abilities to detect fraudulent documents and say serving a large number of customers with limited resources leaves little time to examine identification documents. We highlight our discussions with them below.

- Public Assistance and Food Stamps agency staff say they detect virtually no birth certificate fraud.
- SSA staff report detecting only limited attempts at birth certificate fraud.
- Immigration and Naturalization Service regional office staff indicate they may only be detecting common alternations and obvious counterfeits.
- Passport Services staff note fraudulent birth certificates are getting harder to detect and that imposters are almost impossible to detect once they have obtained a genuine passport.

\(^4\) The El Paso Intelligence Center is staffed by the Drug Enforcement Agency, Immigration and Naturalization Services, and 13 other agencies to collect information on drug trafficking, immigration violations, and other crimes.
Agencies Receive Little Training Focused on the Detection of Fraudulent Birth Certificates. Staff who depend on birth certificates as proof of citizenship and eligibility for services or benefits report receiving little training focused on the detection of fraudulent birth certificates, and that training received is focused on “obvious attempts at counterfeiting.” As such:

- SSA district and field office staff, and Department of Motor Vehicles office employees indicate they receive only limited training focused on the identification of fraudulent birth certificates.

- Public Assistance and Food Stamps agency staff note receiving little or no training to assist them in detecting fraudulent birth certificates.

- Immigration and Naturalization Service staff receive internal training to assist them in the identification of fraudulent birth certificates, but it is limited.

- Passport Services Staff in regional offices and the National Passport Services Center are responsible for issuing passports and receive training focused on birth certificate fraud. However, the over 4,500 acceptance agents located primarily in Post Offices and State and Federal Courts receive little training in the identification of fraudulent birth certificates.

State Practices Create Opportunities for Fraud

Delayed, Amended, and Midwife Birth Registrations Provide Opportunities for Fraud. State and local vital records staff say birth certificates issued based on delayed and amended birth registrations are more likely to be fraudulent. They also say they consider births registered by midwives, and other home births, to have a high potential for fraud.

Delayed birth registration occurs when a certificate of birth is not filed within the time specified by State law. Delayed birth registrations are sometimes the result of unattended home births, midwife births, and other out-of-hospital births. The Model State and Vital Statistics Act and Regulations require delayed certificates to be issued for births not filed within 1 year. Based on our survey responses, the State median time frame for filing delayed registrations is 1 year, but varies from State-to-State and ranges between 10 days and 4 years.

Federal and State staff alerted us to problems with delayed birth registration. These problems arise from the lack of evidence required to file a delayed birth in some States. Not all States include information with birth certificates about the documentary evidence they accept as proof a birth occurred, and upon which delayed registrations are allowed, with delayed birth certificates. Likewise, the documentary evidence required to register delayed births is inconsistent among States. Forty-seven States accept affidavits of
personal knowledge as proof a birth occurred, and 14 include no abstract of documentary evidence when issuing delayed birth certificates.

Amended birth registration occurs when changes are made to the vital information contained on the original birth registration. While we did not specifically address amended birth registrations in our survey, they were identified as problematic in our discussions with Federal agency and State vital records office staff. The overall concern surrounding amended registrations is similar to that of delayed registrations in that some States do not require substantial evidence to amend birth registrations and that birth certificates issued based on amended registrations are not clearly marked as having been “amended.” One State registrar also noted a growing problem in which adults are adopted by other adults, usually for inheritance purposes. In these cases, the adopted person undergoes a legal change of name and their birth record is altered, but the fact that the adoption took place is never recorded in any way on the original or amended birth certificate.

Midwife birth registrations were also identified as an area of concern. Midwives provide a valuable service in insuring the healthy delivery of children and accurate registration of births. However, out-of-hospital births attended by midwives have raised concerns. Sixteen State registrars indicate they have encountered problems specifically linked to midwife birth registration. Our discussions with Federal, State, and local staff during our onsite visits indicate that problems associated with midwife registrations are concentrated along the United States-Mexico border. In fact, midwife registration has become such a problem in one border city we visited that they now require a police officer to be called to the scene shortly after any midwife delivery to verify that the birth actually occurred in the United States. All 41 States that allow midwives to register births have procedures and guidelines in place for such registration, but only 17 of those States require information in addition to or different from that required for hospital births. The additional information required to register midwife births in these States can include attendant affidavits, prenatal and/or post-partum records, and notarized statements or other documentation verifying the birth took place. In addition, some States require that midwives provide documentation that the mother lived in the State at the time the birth occurred.

Delays in Matching Death and Birth Records Create Opportunities for Fraud. While our contacts all agreed that matching death and birth information is a strong deterrent to improper use of a genuine birth certificate, delays in matching those records present opportunities for fraud. In our interviews, we heard many stories in which the identity of a deceased person was assumed by obtaining a copy of their birth certificate. In these stories, imposters chose their new identities from names listed in newspaper obituary columns, from newspaper articles about individuals who had been murdered or killed in accidents, or from cemetery markers. Others had assumed the identities of deceased friends or family members. In each case, the imposter obtained a copy of the deceased person’s birth certificate before it had been matched with the death registration.
With the exception of one State (Connecticut), primary vital records registrars responding to our survey say their offices match death and birth registrations and that they send information regarding deaths occurring in their State to the States in which the deceased individuals were born. They indicate most death information is transmitted to other States by mail (47), but some States (12) also transmit information electronically, and 1 State transmits death information to other States by facsimile.

Forty registrars indicate the time between when a death is registered and the time the death is recorded on a birth record creates opportunities for fraud, and 24 registrars say they do not consider the receipt of death information from other States to be timely. Thirty registrars indicate that, on the average, they provide batched death notification to other States between 1 and 3 months after the death, 11 say between 3 to 6 months after death, 4 say between 6 and 12 months, and 4 say it takes them 12 months or longer to provide death information to other States. The result is that, even though a State may send information to other States on a monthly basis, because of delays and batching of records, the deaths may have occurred many months before the death and birth records can be matched.

Once received, limited resources have forced most States to establish priorities to determine which death and birth records will be matched, and, as a result, 40 States have established priorities for matching death and birth records. As such, 20 States give priority status to matching death registrations for infants under the age of 1 year, and 17 States assign priority status to deceased individuals under the age of 45.

Adding to the problems associated with birth certificates of deceased individuals is the fact that five State registrars do not mark original birth records maintained in the State vital records office “deceased,” and six do not issue certified copies clearly marked “deceased.” In addition, birth certificates issued from computerized abstracts by those offices are not marked “deceased” in 3 of the 37 States that issue them. When asked if they would attempt to gain additional information if the information provided to them was insufficient to provide a positive match between the death registration and a birth record, only 27 registrars said yes.

**Physical Security Creates Opportunities for Fraud.** Despite the statements of registrars, we observed a number of questionable security situations during our onsite visits. Fifty-two of the responding registrars say they keep the paper used to print birth certificates in secured areas (e.g., locked cabinets, vaults, safes, and locked rooms) outside business hours. During business hours however, we observed a number of instances where birth certificate information or the paper used to print birth certificates were not secured. State registrars also indicate the number of vital records employees with access to birth certificate paper ranges between 3 and 60.
In our visits to local offices we also observed a number of situations we consider vulnerable. For instance, in one local office:

- certified copies of birth certificates ready for customer pick-up were kept in a box just inside the customer service counter, in plain view of the public, and well within arms-reach of anyone;

- office copies of carbon-set applications used over the last several years to request copies of birth certificates (and containing all the information needed to obtain additional copies) were kept rubber-banded together and stacked in open boxes on the floor just inside the back door; and

- several stacks of unclaimed birth certificates (some printed as far back as 1995) were kept on a shelf in a small locked closet.

**Destruction of Documents** - The destruction of documents and tools also poses a security problem in some offices. Some State registrars told us they are required to contract with the lowest bidder for destruction of unused or voided birth certificate paper, applications, microfilm, and embossing equipment. In some States, vital records staff “hand-shred” documents and place them in open containers for pick-up and machine shredding at a later date. In one State, paper slated for destruction was stolen or sold, and ultimately used to create fraudulent birth certificates. In that same State, applications and voided documents are now “hand-shredded” and stored in boxes awaiting a new contract for the destruction of documents.

**Employee Background Checks** - In spite of the fact that 25 State registrars say that birth certificate fraud has been committed by vital records employees in their State, only 14 States conduct background checks on vital records office employees.

**Use by Sports Teams** - Another security issue and opportunity for fraud brought to our attention was the use of birth certificates by sports team coaches to prove age and eligibility of players. Every day, thousands of certified copies of birth certificates are carried around on clip boards at ball parks across the country, and in one known instance, a coach discarded birth certificates in a trash container at the end of a season. In other instances, birth certificates used for sports activities were alleged to have been sold across the border to assist illegal aliens to gain entry into the United States.

**Access to Computer Files** - In our discussions with Federal and State staff, we noted a number of staff with direct access to vital records information via computer terminals. While such access allows SSA, public assistance, and Food Stamps staff to quickly verify birth record information online, it increases the number of people with access to that information. In one office, the password to enter the system was printed on a piece of paper taped to the edge of the computer screen.
Limited Oversight of Local Offices Makes Them Vulnerable to Fraud. Of the 42 States with local issuance, State vital records staff conduct monitoring visits to the local offices in their States on an annual basis in only 18 States and biannually in only 3 States. However, we question some States’ abilities to conduct monitoring of between 300 and 500 local offices annually or biannually. In 10 other States, registrars say they also conduct monitoring visits to local issuing offices, but do so only on an “as needed” or occasional basis. There are 2,767 local issuing entities in States where monitoring is done “as needed” or occasionally.

State registrars say the activities conducted during onsite visits can include auditing records, reviewing laws and regulations with issuing staff, providing onsite training, and reviewing security procedures and issues. Many local offices have never been visited by State vital records staff. Staff in those offices that have been visited say the visits are usually nothing more than quick audits of their financial records related to the sale of birth certificates. In another State, the large number of local offices prohibits visiting all of them, so a self-assessment form is used to gather information about security in those offices. By completing this survey, the State vital records office not only gains information about the local offices, but it also educates local office staff regarding security measures.

Very few state vital records staff are assigned responsibility for the detection of fraud, and only 24 States employ someone responsible for fraud activities. However, in 16 States, registrars indicate staff designated responsibility for fraud activities devote less than 25 percent of their time to birth certificate fraud. Other State registrars say their lack of funds prohibits them from employing someone designated responsibility for birth certificate fraud.

In addition, Immigration and Naturalization Service and Department of Motor Vehicles office staff say they experience difficulty in obtaining the information they need to verify questionable birth certificates in a timely manner. As such, Immigration and Naturalization Service staff described situations in which they have detained individuals with suspect birth certificates for which they need immediate vital information, but were unable to get the information quickly. Passport Services staff say they also have encountered problems verifying birth certificate information in a timely manner. In addition to contacting State vital records offices directly, they contact the SSA office in Baltimore, MD, for information to assist them in determining whether or not a birth certificate presented by a passport applicant is valid. However, they are limited in the number of such requests they can make, and are forced to prioritize their requests, choosing which questionable or suspect applications they pursue.

Birth Certificate Fraud is Seldom Prosecuted

Section 1028 of that law addresses fraud activity in connection with identification documents. This law makes it a crime to knowingly produce, transfer, or possess false identification documents with the intent to defraud the United States. Punishment for an offense under this Act is a fine of up to $25,000 and/or imprisonment for up to 5 years. Many State statutes also address identity fraud, but it is considered a felony in only 23 States. In 28 States, birth certificate fraud remains a misdemeanor.

However, virtually all of the Federal and State staff we talked with indicate birth certificate fraud is seldom prosecuted unless it can be linked to large dollar losses or other punishable crimes. Most staff also indicate that many prosecutors are reluctant, or refuse to take birth certificate fraud cases in which the only charge is attempting to obtain another individual’s birth certificate, or counterfeiting or altering a birth certificate. Further, State registrars indicate they receive information about potential fraud cases from Passport Services, SSA, Department of Motor Vehicle offices, and law enforcement. However, most indicate they receive little feedback regarding cases they refer for prosecution.

**Misconceptions Exist Regarding the Security and Integrity of Birth Certificates**

During the course of our study, we found that many misconceptions exist surrounding the security and integrity of birth certificates. We also found that a lack of education exists regarding the importance of securing vital records information. Misconceptions include the following:

- a birth certificate insures the identity and citizenship of the person holding it;
- birth certificates can be obtained only by the individual listed on the certificate or appropriate family members;
- if a birth certificate contains a crimped seal, it is “real”;
- birth certificate information is always safeguarded when provided to user agencies or entities (e.g., sports managers); and
- lamination improves the integrity of birth certificates.
CONCLUSIONS

Birth Certificates Alone do not Provide Conclusive or Reliable Proof of Identity

However, agencies who rely on birth certificates as a means of establishing identity must understand the limitations of accepting a birth certificate as proof of age, citizenship, or identity. While the agency has a need or requirement for establishing identity, the issuing entity most likely does not.

A related point is that genuine documents obtained with counterfeit birth certificates can be used to obtain genuine birth certificates, which in turn are used to obtain additional identification documents. This vicious cycle enables persons establishing false identities to acquire the documentation and proof of identity necessary to open bank accounts, establish credit, and evade law enforcement. Thus, it is inherently illogical to require someone to prove their identity using potentially fraudulent identity documents spawned by false birth certificates in order to obtain a birth certificate.

Further, it would be Impractical to Redesign Birth Certificates to Make them Reliable Identification Documents in and of Themselves

The birth certificate does not provide positive proof of identity of the holder. Efforts to make the birth certificate into a reliable identity document are complicated by the more than 14,000 different versions of legitimate birth certificates currently in existence, and the more than 6,000 entities that issue them and the processes used to do so. Efforts are also complicated by the ease with which birth certificates can be obtained in open States, through the mail, and via the Internet. In addition, technology has made birth certificates easier to counterfeit, and the majority of birth certificate fraud is now being committed by imposter's using genuine birth certificates. Finally, because birth certificates do not expire, currently valid birth certificates will remain valid until an individual’s death, meaning that changes to the birth certificate itself will take essentially a lifetime to become fully effective.

Some Efforts to Redesign Birth Certificates Might Even be Undesirable

The primary purpose for which birth certificates were created -- to document and record births -- is served well by the large number of entities that issue them and the technology that makes them readily and quickly available. It is through the many issuing entities and different issuing processes that we are afforded quick and easy access to our birth and other vital records information.
This intended purpose of birth certificates is also well served by the different types of birth certificates issued, which allows individuals to obtain information in formats most usable to them. However, these are the very things that breed fraud and render birth certificates unreliable proof of identity.

Nevertheless, Since Birth Certificates can Play an Important Role in Establishing Identity, Their Integrity Should be Improved

When used in combination with other documents, birth certificates can add to the level of proof in establishing eligibility and identity. As such, many agencies and organizations request that individuals provide birth certificates in order to receive a benefit or service, or to support the issuance of other documents used for identity purposes. The SSA uses birth certificates as proof of age in assigning Social Security numbers, and as proof of age and citizenship in determining eligibility for Supplemental Security Income benefits. Passport Services considers birth certificates primary evidence of birth in the United States, and while they do not consider birth certificates evidence of identity, they do consider them a primary document in establishing identity. In addition, public assistance agencies use birth certificates as proof of applicant age and relationship/parentage, and driver’s license offices require them as proof of birth and age. Many other State and Federal agencies also rely to some extent on birth certificates as part of the process to establish personal identity and eligibility for services and benefits.

Given that birth certificates will undoubtedly continue to be an important element in determining identity, it is important that the processes used to issue birth certificates be standardized and that recent advances in technology be utilized to ensure birth certificate integrity parallels that of other identification documents. In support of this conclusion, we provide the consensus responses we received for improving the birth certificate process and the detection of birth certificate fraud. The suggestions include the following:

State vital records offices and other entities that issue birth certificates may wish to consider

- taking the steps necessary to reduce the number of legitimate birth certificates by substantially reducing the number of entities that issue birth certificates and different types of birth certificates issued;

- establishing national requirements for security paper;

- placing a higher priority on matching death and birth records and the speed at which these records are matched;

- reducing opportunities for fraud created as the result of delayed, amended, or midwife birth registrations by placing greater emphasis on the scrutiny of
supporting documentation allowed as verification to register delayed, amended, or midwife birth and marking delayed and amended birth registrations accordingly;

- expanding the number of staff assigned responsibility for the detection and enforcement of birth certificate fraud;

- introducing the use of biometrics (e.g., fingerprints or other individual physical identifier) into the birth certificate process, thus insuring positive links between birth certificates and the people presenting them as proof of identity; and

- launching a national campaign to inform the general public and user agencies about the importance of safeguarding vital records and their vulnerability to fraud.

**In Addition, Federal and State Program Administrators Should Assess the Proofs of Identity They Will Accept**

Even if their security is improved, birth certificates may still not be the best proof of identity. For this reason, program administrators may not want to use birth certificates at all, or to use them only with other documents, as noted above. Agencies need to specify which other documents and methods of proving identity (e.g., fingerprints, testimony of relatives, employer information, background checks) they will accept in determining eligibility for services and benefits.

Given what we have learned, if program administrators continue to include birth certificates in the proofs of identity their agencies and organizations will accept, they should reconsider how they use them, and what steps they will take to detect fraudulent certificates and to secure valid ones. For example, they should remain vigilant in their detection of fraudulent documents and genuine documents held by imposters. The nature of each individual program should dictate the level of proof the agency requires to establish identity, and acceptable documents determined accordingly. For instance, the same level of proof required to enroll a child in school may not be the same level of proof required to obtain a passport.

In this vein, we provide consensus responses from persons surveyed and interviewed, which reflect longstanding suggestions for improving the use of birth certificates in establishing identity.

*Federal and State agencies who use birth certificates in determining eligibility for services and benefits may wish to consider*

- reassessing the documents they will accept as proof of identity and program eligibility;

- accepting only birth certificates issued on security paper that meets current national standards;
– using biometrics (e.g., fingerprints, DNA, retinal scans) to assist the agencies in establishing proof of identity;

– improving guidelines and procedures regarding the detection of fraudulent birth certificates, and make them readily accessible; and

– providing staff with ongoing training to assist them in detecting all types of birth certificate fraud.
## State and Local Birth Certificate Issuing Entities

###APPENDIX A

<table>
<thead>
<tr>
<th>State</th>
<th>Number of Issuing Offices by Location</th>
<th>Central/State</th>
<th>County</th>
<th>City</th>
<th>Township</th>
<th>Other*</th>
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*Includes villages, regional branch offices, and some State vital records satellite office.

Birth Certificate Fraud

24

OEI- 07-99-00570
# Types of Certificates Issued and Paper Security Features Used by State Vital Records Offices

## Types of Birth Certificate

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<th>Certified Copy from Computerized Abstract</th>
<th>Birth Card or Wallet Sized Birth Certificate</th>
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