



SOCIAL SECURITY

MEMORANDUM

Date: March 8, 2002

Refer To:

To: Jo Anne B. Barnhart
Commissioner

From: Inspector General

Subject: Performance Measure Review: Reliability of the Data Used to Measure the Quality of the Social Security Administration's Research (A-02-01-11011)

Following consultations with congressional committees, the Office of the Inspector General agreed to review the Social Security Administration's (SSA) performance indicators over a continuous 3-year cycle. We recently completed our first 3-year cycle. In conducting this work, we used the services of an outside contractor, PricewaterhouseCoopers, LLP, (PwC), to assist us in our efforts.

For this report, we used PwC to conduct the review of two of the Agency's performance indicators related to the quality of its research publications. The objective of the review was to assess the reliability of the data used to measure the quality of SSA's research.

Please comment within 60 days from the date of this memorandum on corrective action taken or planned on each recommendation. If you wish to discuss the final report, please call me or have your staff contact Steven L. Schaeffer, Assistant Inspector General for Audit, at (410) 965-9700.



James G. Huse, Jr.

Attachment

**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**PERFORMANCE MEASURE REVIEW:
RELIABILITY OF THE DATA USED TO
MEASURE THE QUALITY OF THE
SOCIAL SECURITY ADMINISTRATION'S
RESEARCH**

March 2002

A-02-01-11011

EVALUATION REPORT



Mission

We improve SSA programs and operations and protect them against fraud, waste, and abuse by conducting independent and objective audits, evaluations, and investigations. We provide timely, useful, and reliable information and advice to Administration officials, the Congress, and the public.

Authority

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

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

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

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

Vision

By conducting independent and objective audits, investigations, and evaluations, we are agents of positive change striving for continuous improvement in the Social Security Administration's programs, operations, and management and in our own office.

PRICEWATERHOUSECOOPERS 

Evaluation of Selected Performance Measures of the Social Security Administration:

Reliability of the Data Used to Measure the Quality of SSA's Research

Office of the Inspector General
Social Security Administration

INTRODUCTION

This report is one of five separate, stand-alone reports, corresponding to the following Social Security Administration's (SSA) process and performance measures (PM):

- Percent of customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness, and responsiveness. (PM #1)

Fiscal Year (FY) 2000 Goal: Develop customer survey and data collection mechanism.

- Percent of Major Statistical Products that are timely. (PM #2)

FY 2001 Goal: Establish a baseline for percent of major statistical projects that are produced on schedule.

This report reflects our understanding and evaluation of the process related to PMs #1 and #2. To achieve its strategic goal, "To promote valued, strong, and responsive social security programs and conduct efficient policy development, research, and program evaluation," SSA has developed several strategic objectives. One of these objectives is "...to provide information for decision makers and others on the Social Security and Supplemental Security Income programs through objective and responsive research, evaluation, and policy development." SSA's FY 2001 Annual Performance Plan (APP) contains two performance indicators developed to meet this objective as follows:

- Percent of customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness, and responsiveness* - This indicator will be considered achieved if SSA develops a customer survey and data collection mechanism.
- Percent of major statistical products that are timely* - This second indicator will be considered achieved if SSA establishes a baseline for percent of major statistical projects that are produced on schedule.

We performed our testing from September 21, 2000 through February 15, 2001. Our engagement was limited to testing at SSA's headquarters in Woodlawn, Maryland. The procedures that we performed were in accordance with the American Institute of Certified Public Accountants' Statement on Standards for Consulting Services, and are consistent with appropriate standards for performance audit engagements in *Government Auditing Standards* (Yellow Book, 1994 version). However, we were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the reliability or accuracy of the reported results of the performance measures evaluated. Accordingly, we do not express such an opinion.

Performance Measure # 1 - Percent of customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness, and responsiveness.

BACKGROUND

This indicator has been created to measure the percent of customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness, and responsiveness. The goal during FY 2000 was to develop a customer survey and data collection mechanism. After the first survey is administered SSA plans to make updates based on the results, as appropriate. Below is an overview of SSA's customer satisfaction survey and data collection mechanism.

Survey Objectives

This initiative seeks to better understand the information needs of decision-makers and other customers of SSA research, statistics, and policy analysis products and services. Moreover, SSA seeks to determine how effectively it is meeting those needs. Specifically, this study is to determine:

- To what extent SSA's work is reaching a broad audience in the research and policy community.
- To what degree this work is perceived to be of high quality.
- How satisfied the SSA customers are with the information they receive.
It also aims to better understand the needs of active participants in the research and policy community who are currently non-users of SSA informational services.

Sample Design

The survey is expected to employ a stratified probability sampling design, where the strata are defined based on the following customer characteristics:

- I. Decision-maker;
- II. Subscriber;
- III. Non-subscribers who are active in the research and policy community; and
- IV. Non-subscribers who are interested.

The first stratum, Decision-makers, consists of 59 individuals selected by SSA based on the assumption that they have significant potential for influencing policy decisions. Those in the second stratum, nearly 1,000, are individual subscribers to various SSA publications. The third stratum is comprised of different individuals, including attendees of various SSA conferences and members of the National Academy of Social Insurance (NASI). This stratum includes about 1,500 individuals. The fourth stratum includes approximately 800 non-subscribers who are interested in receiving SSA statistical publications. While individuals from the third and fourth strata originate from separate sources, they will be combined to create an "active non-subscriber" group. The following table provides a summary of the sampling design for this survey.

Table 1. Sampling Design and Universe Counts

Strata	Source	Population	Sample
Decision-makers	Individually selected by SSA Office of Policy	59	59
Subscribers	Subscribers to various SSA publications	978	978
Active, Non-Subscribers	Non-subscribers, attendees of Retirement Research Consortium and other conferences, as well as members of NASI	1,422	485
Non-subscribers	Non-subscribers, generated from database of stakeholders, maintained by SSA's Office of Communication	814	278
Total		3,273	1,800

Because the list of decision-makers is relatively small, the sample design calls for a census of all these individuals. Further, because the subscriber group is expected to contain the largest concentration of "users," the entire list will also be included in the sample. For the remaining two strata, however, it is not clear at this point what methods will be used to select the needed samples. It appears that all lists have been examined to remove individuals with multiple entries, though additional processing is required to identify addresses and or telephone numbers where needed information is missing.

SSA personnel stated that the target response rate to this survey is expected to be at least 80 percent. Consequently, SSA anticipates needing a sample of about 1,250 to secure the required 1,000 responses. It is expected that this sample size will be sufficient for various statistical analyses. It should be noted that SSA's contractor deems the 80 percent response rate unachievable and is designing the samples based on a lower rate of 50 percent. However, the total sample of 1,800 will not be adequate to obtain the desired 1,000 responses should the response rate be as low as 50 percent.

Questionnaire Design

The questionnaire for this survey is designed with the intent that respondents can complete it within 15 minutes. Considering that the length of a survey can impact the response rate, it is important to keep the response time within the specified time limit, even in a survey like this where some respondents might have a vested interest.

Since there will be one single questionnaire for all sample types, a few skip patterns are required to administer appropriate questions to corresponding respondents. For instance, respondents who identify themselves in the survey as recent users will be asked about the type, frequency, topics, quality, usefulness, and satisfaction with SSA materials. Non-users will be surveyed about their Social Security related informational needs. Lastly, users and non-users will also be asked about the most important research/policy issues that SSA should focus on during the next few years.

Currently, the questionnaire is being tested and fine-tuned via focus groups and cognitive interviews. The focus groups were conducted in December 2000 with a sample of users with various informational needs. SSA personnel stated that, consistent with Office of

Management Budget (OMB) restrictions, fewer than 10 respondents will participate in each focus group. Following the focus groups, cognitive interviews will be conducted to further test questionnaire content. These interviews are planned to be conducted over the telephone with a combination of users and non-users once the questionnaire is finalized; the date of which had not been determined at the time of our evaluation.

Administration/Data Collection (Anticipated)

Since the survey had not been administered at the time of our evaluation, this evaluation will be limited to those procedures that have been proposed. According to the proposed plan, the survey administration will consist of the following steps:

- All sampled individuals will be mailed a pre-notification letter. This letter will provide a brief description of the purpose of the study and inform the individual that the questionnaire will be arriving shortly.
- One week later, the survey packet will be mailed. This packet will consist of a copy of the questionnaire, a return envelope, and a letter regarding the purpose of the study. This letter will also assure confidentiality and specify the web-site address where respondents can visit to complete the survey on-line.
- One week later, a reminder postcard will be sent to all sampled individuals.
- Two weeks later, non-responder telephone calls will be initiated, at which point individuals will be given the option to complete the questionnaire over the phone, as well as on the web, or by mail.

It is anticipated that multiple data collection modes will help secure the required 80 percent response rate. Meanwhile, inactive non-subscribers will be dropped from the survey and excluded from the number of completes and the response rate.

Analysis and Report Generation (Anticipated)

SSA's contractor anticipates the first step in the data analysis plan to be combining the data gathered via the three modes of data collection into one file. This data file will then be cleansed of duplicate entries. Next, the contractor will remove responses where over half of the items are missing. Checks will also be performed to clean inconsistent data. With the "cleansed" data, the contractor will conduct an analysis within the self-identified users group. The users will be divided into two sub-groups – subscriber or non-subscriber, based on their sample frame origin. Comparisons between the subscriber and non-subscriber sub-groups are expected to be evaluated to determine any differences in the way these groups perceive the quality of SSA's work.

The primary analysis will focus around the subscriber and non-subscriber groups. In addition to simple descriptive statistics, SSA is expecting analyses that will effectively measure respondents' evaluations and levels of satisfaction with the services they receive. SSA's contractor will also perform a leverage analysis to determine the most critical characteristics in driving overall product and service satisfaction. This method uses regression techniques to identify the most important factors that can predict the outcome measure of interest. In the final report, SSA is expecting documentation regarding the methodology used, and conclusions and recommendations for further study.

RESULTS OF EVALUATION

During the period of September 21, 2000 to February 15, 2001, we evaluated the current processes and controls, which support the FY 2000 SSA performance measurement process. Our evaluation of the information provided to us by SSA management and its contractor as of February 15, 2001, allowed us to determine that SSA has made significant progress to date in the implementation process, and it has the capacity to effectively complete the implementation process.

<u>Performance Measure</u>	<u>Reported Result</u>
1. Percent of customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness, and responsiveness.	In the process of developing customer survey and data collection mechanism.

Although not directly related to GPRA compliance, we noted the following three opportunities for improvement:

1. Sampling frames do not provide a comprehensive listing of all users and non-users of SSA research products.
2. Limited information has been collected by SSA from non-users of SSA research products.
3. The questionnaire design could be improved by SSA.

These items were noted as a result of our testing of the SSA survey instrument, as it currently exists, as well as the focus group documentation, sampling parameters, and discussions with SSA regarding future plans.

This survey has not been conducted yet. As a result, our evaluation will be limited to the steps that have been completed to date and the planning that has been done for future steps. After the survey has been administered and the corresponding data has been analyzed, it is critical to apply a similar evaluation to these future components of research. The following is a listing of potential issues that deserve attention:

- 1. Sampling frames do not provide a comprehensive listing of all users and non-users of SSA research products.**

Based on the very limited information provided by SSA's contractor it appears that the sampling frames that support the nonsubscriber stratum may not provide a complete listing. In addition, these lists include ineligible (non-active) individuals, as well as inaccurate contact information for a significant number of listed individuals.¹ Consequently, the target universe for this survey is not determinable at this time, and therefore the results of the survey may not be generalized.

¹ Proposed sampling plan, data collection plan, and initial data analysis plans. SSA's contractor, December 21, 2000.

The Paperwork Reduction Act of 1995, Implementing Guide, Chapter 6, E1 states that statistical laws that permit inference from a sample to a population assume complete coverage, complete response, and random selection. If any of these conditions are not met, then inferences cannot be demonstrated to be valid (i.e. cannot produce results that can be generalized to the universe of study). The OMB Resource Manual for Customer Survey states, "The ability to make general statements about your agency's customers based on the survey results is linked to how complete and accurate your frame is."

Furthermore, based on the contractor's report from the focus groups, we also are aware of inconsistencies in SSA's current lists. Therefore, we suggest that SSA carefully reexamine the sampling frame used to support the survey.

2. Limited information has been collected by SSA from non-users of SSA research products.

Limited information has and will be collected from the active non-user group. Focus groups have been conducted to improve the effectiveness and quality of the questionnaire. However, it appears that only the users of SSA services were included in the process and focus groups, leaving out non-users, a group that can provide invaluable insight regarding the available services. For example, users cannot comment on why they do not use SSA's services.

The OMB Resource Manual for Customer Survey, Chapter 3 *Defining Customer Survey*, states, "It is important to talk to as diverse a group of customers as possible, so that no major perspective or point of view is omitted."

3. The questionnaire design could be improved by SSA.

The most recent draft of the questionnaire we have been provided, dated January 29, 2001, asks non-users via an open-ended question, if there is any particular reason why they have not used SSA's information. The content of this question is a valuable addition to the questionnaire design. However, because it is an open-ended question, fewer respondents are likely to answer. Closed-ended questions receive better response rates than open-ended questions, because they are less burdensome for respondents than open-ended questions. The use of closed-ended questions will secure a higher response rate and will improve the quality of the resulting data.²

CONCLUSIONS AND RECOMMENDATIONS

SSA is making progress in preparing for the implementation of this survey. Per conversations with SSA, the contractor has revised the questionnaire to eliminate some of the earlier issues. This process of questionnaire refinement is still in progress. It appears that SSA, with its contractor support, has the capacity to implement the process.

It is important to note that even if everything proceeds according to the plans, this survey will continue to have issues related to the extrapolation of results. Since the target universe for this survey is not determinable, the results of the survey cannot be generalized to a known universe of potential users and non-users, with any degree of validity at this time.

² Sudman, Seymour & Bradburn, Norman M. *Asking Questions: A Practical Guide to Questionnaire Design*. (1st ed.) Jossey-Bass Inc., Publishers, 1982, pp.148 - 152.

We recommend:

- 1) SSA and its contractor should investigate alternative sources for a sampling frame, so they can better target the universe. For the current year, steps should be taken to refine the universe by eliminating “ineligible” individuals.
- 2) Since users cannot comment on why they do not use SSA’s services, SSA should conduct focus groups that also include non-users of SSA’s defined statistical products.
- 3) In order to increase response rate to this question and improve the quality of the resulting data, SSA should rephrase the question to non-users of SSA’s statistical products, regarding the reason why they have not used SSA’s information. The question could be a “check all” type question, with reasons why non-users have not used SSA information as response categories. In addition, SSA should include “Other: _____” as a response category.

Performance Measure # 2 - Percent of Major Statistical Products that are timely.

BACKGROUND

The indicator created by SSA is to measure the “Percent of major statistical products that are timely,” with the goal during FY 2000 to establish a baseline for timeliness. This indicator is linked to SSA’s strategic objective to “Provide information for decision makers and others on the Social Security and Supplemental Security Income programs through objective and responsive research, evaluation, and policy development.”

The SSA APP for FY 2001 states that “Responsive research, evaluation, and policy development means providing relevant information in the clearest possible manner with an efficient use of resources.” The Office of Research, Evaluation and Statistics (ORES) has selected five of their publications to measure.

- I. **Fast Facts** (annual)
On Internet—10 weeks from release of Trustees Report
In print—11 weeks from release of Trustees Report
- II. **Income of the Population 55 or Older** (biannual, in even years)
On Internet—January 31
In print—March 15
- III. **Income of the Aged Chartbook** (biannual, in even years)
On Internet—March 31
In print—April 7
- IV. **Annual Statistical Supplement** (annual)
On Internet—in phases between August and December (still finalizing dates)
In print—December 31
- V. **SSI Annual Statistical Report** (annual)
On Internet—July 10
In print—July 3

The publications selected by ORES were chosen based on their volume of usage. ORES arrived at the above dates through: 1) detailed discussions with the division directors or analysts involved in developing the publications and with staff of the Division of Information Resources (DIR) in ORES, and 2) historical data from DIR for the last several years on dates when documents were sent to the Office of Publications Management (OPUM), when OPUM cleared the documents to be sent to the printer, and when documents were received from the printer. These dates have been established as the measure of a report being timely.

ORES receives the information to be included in the publications from several sources both within and outside SSA. The measure begins when ORES receives the data and ends when the information is published on the Internet and in hard copy. The ORES milestones in the publication process are as follows:

- Data availability;
- ORES analysts/programmer production of all text, tables and charts;
- DIR completion of editing and production of charts;
- For 3 publications, receipt of blue lines (a copy of the print format) from the printer;
- DIR posting of document on Internet in PDF format; and
- Receipt of publication from printer.

RESULTS OF EVALUATION

During the period of September 21, 2000 to February 15, 2001, we evaluated the current processes, systems and controls, which support the FY 2000 SSA performance measurement process. Our evaluation of the information provided by SSA management as of February 15, 2001, allowed us to determine that SSA has made significant progress to date in the implementation process, and it has the capacity to effectively complete the implementation process.

<u>Performance Measure</u>	<u>Reported Result</u>
2. Percent of major statistical products that are timely	Established baseline schedule

However, we did note the following two opportunities for improvement:

1. SSA should incorporate other publications as part of this measure.
2. SSA is not fully evaluating the currency of the data.

These items were noted as a result of our discussions with SSA regarding current and future plans.

After evaluating SSA's documentation and speaking with the Deputy Associate Commissioner of ORES it is apparent that SSA has put significant effort into deciding what publications are to be measured and in creating a timetable for publication. The timelines were established based on when ORES has historically received the information. Since part of the information included in the publications comes from outside SSA, the established deadlines may need to be adjusted in the future due to circumstances beyond SSA's control.

The following is a listing of potential issues that deserve attention.

1. SSA should incorporate other publications as part of this measure.

The strategic objective linked to this measure is for the entire agency while only one part of the agency is being measured. Currently SSA is only measuring five statistical publications that ORES produces. Other divisions of SSA produce material "...for decision makers and others..." about the Social Security and Supplemental Security Income programs.

Furthermore, this indicator only measures statistical publications, instead of statistical and non-statistical publications about these programs. By including major publications produced by other SSA divisions and major non-statistical products, the performance measure would better support the strategic objective and allow management to see the timelines throughout the agency rather than within one division. Thus, this would provide management with a tool to measure the performance of divisions throughout the agency.

2. SSA is not fully evaluating the currency of the data.

The strategic objective linked to this measure requires the information to be relevant. Currently SSA only measures the production cycle of the publication process. The collection cycle is not included in the measure. By not including the collection process, the metric does not yield a complete or full measurement of the time involved. If information entering the production cycle is already outdated, it will not be relevant to users, and therefore the measure does not evaluate whether the data was collected in a timely manner. By measuring the entire publishing cycle from data collection through release to users, management will be better able to evaluate if the information provided is relevant pertaining to timeliness.

CONCLUSIONS AND RECOMMENDATIONS

SSA has started the process to develop a good measure to support its strategic objective; however, the measure could be improved to better support the strategic objective. SSA is only measuring the timeliness of publication of one division and only five publications, which represent only a portion of the information provided to decision-makers for these programs. The strategic goal is for all information used by SSA, not just that published by ORES.

While not measuring inputs versus outputs, the measure does fall within the intent of GPRA. The measure, which is being used to establish whether information is being provided in a timely manner, will provide management the ability to evaluate their processes and improve internal management.

We recommend:

- 4) SSA should expand PM #2 to include additional types of reports and include publications produced by divisions other than ORES.
- 5) For the timeliness to be measured and to ensure that data being published is current, SSA should evaluate the entire publication cycle, not just the production cycle.

OTHER MATTERS

SSA has not quantified the timeliness goal.

While SSA has established a timeline and cycle for the production of the publications, the actual goal of how many of the publications have to be produced within their timeline in order for SSA to meet its goal has not been set. SSA has not established the target goal, i.e., what would be considered a success for this indicator. Do all of the publications have to be produced by their established publication date or only 60 percent for the Agency to be successful? GPRA states in section 1115 (a)(2), "...express such goals in an objective, quantifiable, and measurable form unless authorized to be in an alternative form under subsection (b)." Subsection (b) does not apply to this goal because it is feasible to meet the criteria stated in section 1115 (a)(2).

Recommendation

- 6) Starting in FY 2002, SSA should consider establishing a quantitative goal (e.g., 95 percent of all publications should be produced within their established timetable) in order to evaluate whether the timelines measure has been met.

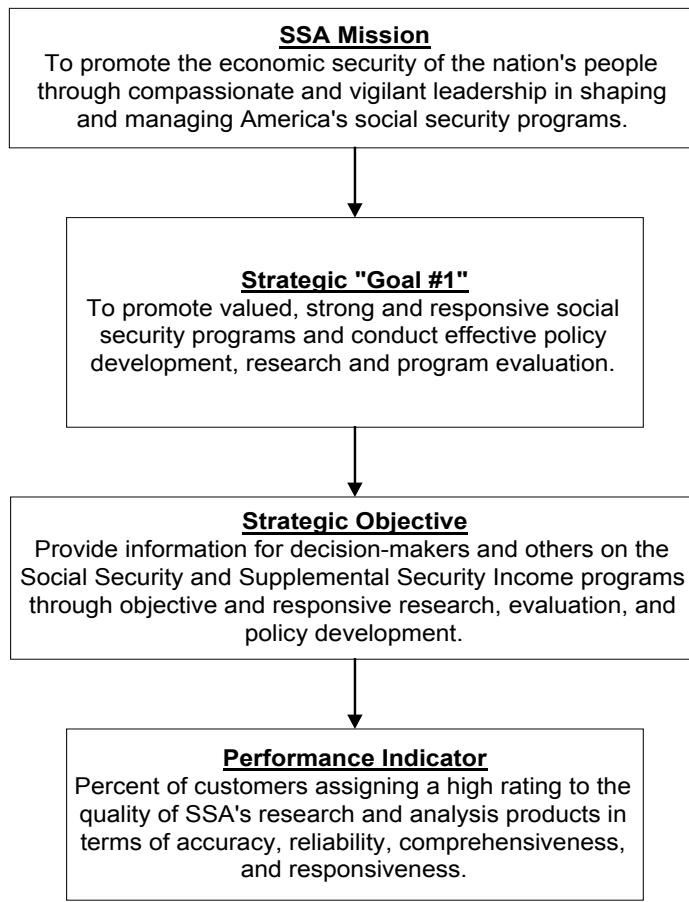
By establishing what percentage of publication cycles has to be completed within their established timeframe, management will be establishing target goals for the performance indicator. This would allow management to assert whether they have met their goal and allow it to be evaluated by outside observers.

APPROPRIATENESS OF PERFORMANCE MEASURES

As part of this engagement, we evaluated the appropriateness of each of the performance measures with respect to GPRA compliance and SSA's APP. We determined whether the specific indicators and goals corresponded to the strategic goals identified in SSA's APP, determined whether each of these indicators accurately measures performance, and determined their compliance with GPRA requirements.

Performance Measure #1 aligns logically with the SSA Strategic Plan but still needs some improvement.

The relationship between PM #1 and the applicable SSA Strategic Goal is depicted in the following figure:



The SSA mission is supported by five strategic goals, including Goal #1, “to promote valued, strong and responsive social security programs and conduct effective policy development, research and program evaluation.” Goal #1, in turn, is supported by several strategic objectives, including the relevant objective that deals with the provision of SSA information to decision makers, “Provide information for decision-makers and others on the Social Security and Supplemental Security Income programs through objective and responsive research, evaluation, and policy development.” Performance Measure #1 depicts the customer satisfaction with SSA research and analysis products. Assuming that the metric has strong performance measurement attributes, the diagram indicates that PM #1 logically aligns with SSA’s strategic planning process.

Based on the taxonomy of performance measures included in Appendix F, PM #1 is a measure of accomplishment because it reports on a result (customer satisfaction) achieved with SSA resources. It is further categorized as an outcome measure because it indicates the accomplishments or results (customer satisfaction) that occur because of the services (SSA research products) provided. As shown in Appendix F, outcome measures include public perceptions of outcomes, such as a customer satisfaction index.

Within the framework of GPRA, Performance Measure #1 fits the intent of an outcome measure because it is “...a description of the intended result, effect, or consequence that

will occur from carrying out a program or activity.”³ The intent of this performance measurement is to gauge customer satisfaction (i.e., the effect) for the activity of providing research and analysis products. Assuming it is accurate, it can be useful to both management and external stakeholders, as encouraged by OMB Circular A-11. However, we have identified a few underlying deficiencies that indicate it may not be a reliable GPRA performance indicator.

First, the metric may not promote an adequate and correct understanding of the subject area. Outcome measures such as customer satisfaction indices are complex multivariate metrics that depend on a host of attributes. Defining a critical performance indicator simply based on a single percentage will fail to provide a comprehensive metric. Such simplistic measures may not provide sufficient intelligence for taking appropriate action and subsequently improving performance. Due to the sampling frame issue, there is no guarantee the metric will provide a true picture of the value of SSA research data.

The data is partially subjective because it reflects the opinion of the respondents at the time they answer the survey. Furthermore, use of the data to measure progress from year-to-year is reliable only for the specific sample. Since the employed sampling method is not probability based, the extrapolative power of the resulting survey data will remain undeterminable. In addition, a performance metric should ideally allow SSA to track progress over time. In this case, consistency may suffer due to the nature of the sampling frame. If the survey is repeated from year to year, statistical comparisons between the various years are likely to be unreliable.

At the time of this evaluation, SSA and their contractor had not yet determined a method for analyzing and processing the survey data in order to obtain the desired baseline metric. Furthermore, they had not yet established a method for evaluating progress over a multi-year horizon. These shortcomings pose legitimate concerns, since such analyses are essential for the metric to be useful.

Based on their assigned task, Office of Policy and their contractor have done well in establishing the activities required for obtaining PM #1. Furthermore, the customer satisfaction survey will be a useful product because SSA can use the data to gain valuable insight into stakeholders’ needs with respect to the research and analysis products. However, as a GPRA performance metric, PM #1 has underlying deficiencies and its reliability is in question.

Recommendation

- 7) SSA should put this metric on hold until the contractor develops a method for analyzing the survey data, developing the baseline metric, and using the metric to manage performance over a multi-year horizon. If these objectives can not be satisfactorily completed, the metric should not be included in the GPRA measurement system.

Combined survey results can be misleading because the utility of the SSA research and analysis products varies for each user.

At the time of this evaluation, neither ORES nor their contractor had established a plan for computing the customer satisfaction results from the survey data. When this is determined,

³ OMB Circular A-11 *Preparation and Submission of Budget Estimates*, section 200.2.

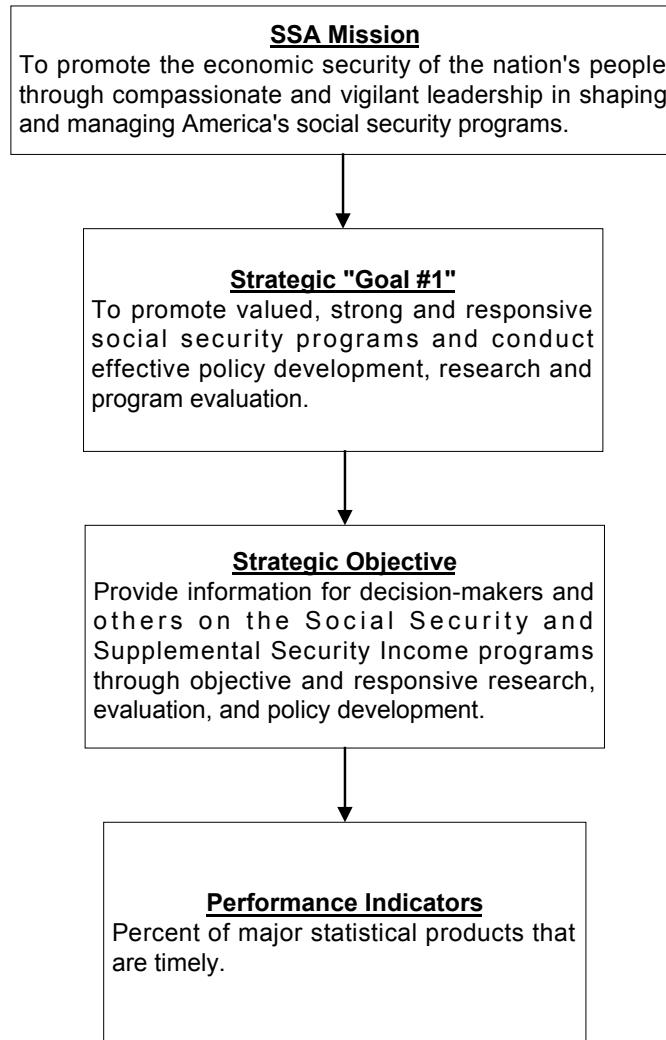
ORES should carefully consider the manner in which they combine the responses from the various user types. The utility of SSA research products is not equal for each user. A few significant respondents may rely extensively on the SSA research and analysis products as crucial inputs to their own analytical and decision making products, which, in turn, are important national policy tools in their own right. In such cases, research information used by one user may have a significant benefit to society. On the other hand, many respondents may utilize these products to a far lesser degree and may not rely on their timeliness and accuracy to as great an extent. Unfortunately, these two types of customers carry the same weight in the customer satisfaction survey results. This is a ramification of the survey's sampling frame. For example, assume that all of the significant users have responded and that any additional responses will come from "occasional" users. As additional responses are incrementally added to survey, the results may become skewed. The occasional users may have either a higher or a lower opinion of the products relative to the significant users. Regardless, they can change the apparent outcome of the customer satisfaction survey, even though the overall value of the SSA research products to the public have changed very little.

Recommendation

- 8) ORES should pay careful attention to the manner in which survey results are combined.

Performance Measure #2 aligns logically with the SSA Strategic Plan and can potentially provide numerous management benefits.

The relationship between PM #2 and the applicable SSA Strategic Goal is depicted in the following figure:



The SSA mission is supported by five strategic goals, including Goal #1, “to promote valued, strong and responsive social security programs and conduct effective policy development, research and program evaluation.” Goal #1, in turn, is supported by several strategic objectives, including the relevant objective that deals with the provision of SSA information to decision makers, “Provide information for decision-makers and others on the Social Security and Supplemental Security Income programs through objective and responsive research, evaluation, and policy development.” Performance Measure #2 characterizes the timeliness of the SSA statistical products. Assuming that the metric has strong performance measurement attributes, the diagram indicates that PM #2 logically aligns with SSA’s strategic planning process.

Based on the taxonomy of performance measures included in Appendix F, PM #2 is a measure of accomplishment because it reports on a result (timeliness) achieved with SSA resources. It is further categorized as an output measure because it indicates the quantity of services provided. As shown in Appendix F, output measures include indications of the quantity of a service provided that meets a certain quality requirement, such as on-time standards of achievement.

Within the framework of GPRA, PM #2 fits the intent of an output measure because it is “...a description of the level of activity or effort that will be produced or provided over a period of time or by a specified date, including a description of the characteristics and attributes (e.g., timeliness) established as standards in the course of conducting the activity or effort.” While this performance measure may, in theory, represent a good measure of timeliness, it also has some areas for improvement.

The metric is narrow in focus. Specifically, it counts the timeliness of publications from only ORES, thus representing only one office within the agency. However, by its very name and description, stakeholders may be led to believe that it measures the timeliness of all of SSA's major statistical products. Furthermore, the metric only includes five products in its calculation. In addition, the measure does not distinguish between large and small-scale efforts. A publication that theoretically requires 80 percent of the resources will impact the measure in the same way as a publication that requires negligible resources. Finally, there is no policy as of yet for determining the circumstances that allow for a change in the target date without being penalized for the lack of timeliness.

Despite these issues, the metric has strong performance measure attributes and can be used as an excellent project management tool. In fact, SSA is encouraged to leverage the additional benefits that can be obtained with this type of project management tool. For example, they could focus beyond the literal description of the metric and utilize the data itself as a management tool. As a result, real time decisions and corrections can be made during the publication process to help improve the on-time delivery of the products. It is also noteworthy that the measure addresses only the steps of the publishing process that are completed after ORES receives the relevant information.

Recommendation

- 9) To further leverage the project management characteristics of this metric, it is recommended that ORES develop methods for obtaining status throughout the publishing process. Finally, it would be relatively easy to compare the timeliness of SSA statistical products with the on-time delivery of publications from other agencies. It is recommended that ORES decompose their publication process into major subtasks, as necessary, so that they can benchmark against other government and commercial publishing operations. In addition, ORES should expand the metric to include other documents. They should also develop a policy to address the change of target dates.

Agency Comments

The Agency agreed with eight of the nine recommendations within this report. It disagreed with the recommendation to “...include additional types of reports and include publications produced by divisions other than the Office of Research, Evaluations, and Statistics” in the performance measure, “Percent of major statistical products that are timely.” SSA determined that there are no other statistical publications that are produced regularly, have a statutory deadline, or are considered major in terms of usage.

In agreeing with the recommendation that SSA should evaluate the entire publication cycle, not just the production cycle, when measuring the timeliness of its statistical products, SSA stated that it was already doing what was recommended.

OIG Response

We appreciate the Agency's response to this report. The implementation of the recommendations will help to ensure for the better measurement and reporting of the quality of SSA's research. We continue to recommend that SSA consider the inclusion of additional types of reports and publications in its measurement of the timeliness of its research. While the Agency may have determined that it currently includes all publications that are regularly produced, have a statutory deadline, or are considered major in terms of usage, we believe there are other research related publications produced by the Agency that are used by decisionmakers. While these publications may not be regularly produced or mandated by statute, their timely delivery to decisionmakers is nonetheless important. The measurement of the timeliness of all research products produced in a given year is in line with the strategic objective related to the timeliness performance measure--Provide information for decision-makers and others on the Social Security and Supplemental Security Income programs through objective and responsive research, evaluation, and policy development.

We also continue to recommend that SSA evaluate the entire publication cycle, and not just the production cycle, when measuring the timeliness of its statistical products. SSA currently does not measure the collection cycle of the process for all of the publications being measured. By measuring the entire publishing cycle, from data collection through release to users, SSA will be better able to evaluate if the information provided is relevant to its users.

APPENDICES

APPENDIX A – Scope and Methodology

APPENDIX B – Acronyms

APPENDIX C – Agency Comments

APPENDIX D – Performance Measure Summary Sheets

APPENDIX E – Performance Measure Process Maps

APPENDIX F – Performance Measure Taxonomy

SCOPE AND METHODOLOGY

The Social Security Administration (SSA) Office of the Inspector General contracted PricewaterhouseCoopers (PwC) to evaluate 11 SSA performance indicators identified in its FY 2001 APP. We performed our testing from September 21, 2000 through February 15, 2001.

Our engagement was limited to testing at SSA's headquarters in Woodlawn, Maryland. The procedures that we performed were in accordance with the American Institute of Certified Public Accountants' Statement on Standards for Consulting Services, and are consistent with appropriate standards for performance audit engagements in *Government Auditing Standards* (Yellow Book, 1994 version). However, we were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the reliability or accuracy of the reported results of the performance measures evaluated. Accordingly, we do not express such an opinion.

For these two performance indicators, PwC was asked to assess SSA's progress to date in the implementation process, and evaluate if SSA has the capacity to effectively complete the implementation process.

1. Percent of customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness, and responsiveness. (PM #1)

We performed an evaluation of the survey methodology used for this performance measure, to assess SSA's progress in implementation of the survey and ability to complete the implementation process. Specifically, we assessed completed steps associated with the sampling frame, the sample design, and the draft of the questionnaire. This included evaluating survey objectives, sample and questionnaire designs, data collection, and analysis and report generation.

We obtained an understanding of the underlying process and procedures surrounding the implementation of the measure through interviews and meetings with the appropriate SSA and contractor personnel and by reviewing and evaluating the following documentation:

- SSA's Statement of Work, dated July 2000;
- Most recent draft of the questionnaire, dated January 29, 2001;
- Contractor's status report to SSA, Office of Policy, dated October 27, 2000, regarding: "Sample frame, initial recommendations for data collection, and plans for pretest and focus group;"
- Focus Group report, dated December 21, 2000;

Appendix A

- Contractor's memo to SSA, Office of Policy, dated January 12, 2001, regarding "Proposed sampling plan, data collection plan, and initial data analysis plan." This memo provided a summary of recent developments and modifications to the original plan
- General Accounting Office (GAO) reports on SSA FY 2001 Performance Plan.

2. Percent of Major Statistical Products that are timely. (PM #2)

In order to assess SSA's progress to date in the implementation process and evaluate if SSA has the capacity to effectively complete the implementation, we obtained an understanding of the underlying process and procedures surrounding the implementation of the measure through interviews and meetings with the appropriate SSA personnel. In addition, we evaluated the following:

- Memo from ORES regarding publication process and method used to established timelines for publication;
- Process/cycle memos for the publications to obtain an understanding of the publication process; and
- GAO reports on SSA FY 2001 Performance Plan.

3. Determined whether both performance measures were meaningful and in compliance with GPRA.

As part of this engagement, we evaluated the appropriateness of each of the performance measures with respect to GPRA compliance and SSA's APP. To do so, we determined whether the specific indicators and goals corresponded to the strategic goals identified in SSA's APP, determined whether each of these indicators accurately measure performance, and determined their compliance with GPRA requirements.

ACRONYMS

APP	Annual Performance Plan
DIR	Division of Information Resources
FY	Fiscal Year
GAO	General Accounting Office
GASB	Government Accounting Standards Board
GPRA	Government Performance Results Act
NASI	National Academy of Social Insurance
OASDI	Old Age, Survivors, and Disability Insurance
OIG	Office of the Inspector General
OMB	Office of Management and Budget
OP	Office Policy
ORES	Office of Research, Evaluation and Statistics
PM	Performance Measure
PwC	PricewaterhouseCoopers LLP
SSA	Social Security Administration
SSI	Supplemental Security Income
OPUM	Office of Publications Management

Appendix C

AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

December 10, 2001

Refer To: S1J-3

To James G. Huse, Jr.
Inspector General

Larry Dye
Chief of Staff

A handwritten signature in black ink that reads "Larry Dye".

Office of the Inspector General (OIG) Draft Report, "Performance Measure Review: Reliability of the Data Used to Measure the Quality of the Social Security Administration's Research"
(A-12-01-11011)—INFORMATION
02

We appreciate OIG's efforts in conducting this review. Our comments on the report content and recommendations are attached.

Please let us know if we may be of further assistance. Staff questions may be referred to Trudy Williams on extension 50380.

Attachment:
SSA Response

Appendix C

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "PERFORMANCE MEASURE REVIEW: RELIABILITY OF THE DATA USED TO MEASURE THE QUALITY OF THE SOCIAL SECURITY ADMINISTRATION'S RESEARCH" (A-02-01-11011)

Thank you for the opportunity to review and comment on this draft report. We are pleased to note that OIG acknowledges that SSA has developed useful performance indicators in the spirit of the Government Performance and Results Act (GPRA) and has discussed them in detail in the Fiscal Year (FY) 2001 Performance Plan.

Our comments on the report recommendations are detailed below.

Performance Measure Number 1 - Percent of Customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness, and responsiveness.

Recommendation 1

SSA and its contractor should investigate alternative sources for a sampling frame, so they can better target the universe. For the current year, steps should be taken to refine the universe by eliminating "ineligible" individuals.

Comment

We agree. SSA has long recognized that measuring satisfaction with policy analysis products is inherently difficult, especially in identifying actual and potential customers. SSA is the only agency that is attempting to include such a measure in its performance plan. In order to meet our goal of conducting an initial survey in FY 2001, we used the best information that could be developed, while recognizing that we did not have a fully satisfactory sampling frame. However, OIG has offered no possible solutions. We believe that attempting to measure customer satisfaction is important, even if it cannot be done with complete precision, and we will continue to do so periodically. Consequently, if we cannot develop a measure that is statistically representative and can be tracked over time, we will drop this item from the performance plan.

Recommendation 2

Since users cannot comment on why they do not use SSA's services, SSA should conduct focus groups that also include non-users of SSA's defined statistical products.

Comment

We agree. We will implement this recommendation before conducting the next survey in FY 2004.

Appendix C

Recommendation 3

In order to increase response rate to this question and improve the quality of the resulting data, SSA should rephrase the question to non-users of SSA's statistical products, regarding the reason why they have not used SSA's information. The question could be a "check all" type question, with reasons why non-users have not used SSA information as response categories. In addition, SSA should include "Other: _____" as a response category.

Comment

We agree and will implement this recommendation before conducting the next survey in FY 2004.

Performance Measure Number 2 (PM #2) -Percent of Major Statistical Products that are timely.

Recommendation 4

SSA should expand PM #2 to include additional types of reports and include publications produced by divisions other than the Office of Research, Evaluation, and Statistics (ORES).

Comment

In the report, OIG acknowledges the Agency made a significant effort in identifying publications for this measure. We have determined that no other SSA statistical publications are produced regularly, have a statutory deadline, or are considered major in terms of usage. Therefore, we disagree with this recommendation.

Recommendation 5

For the timeliness to be measured and to ensure that data being published is current, SSA should evaluate the entire publication cycle, not just the production cycle.

Comment

We agree and believe that we are already doing what is recommended, with the exception of benchmarking against other publishing operations. The current timetable lists the reference period of the data, when the data will become available, when analysts will complete a draft, when editing and production will be completed, when the document will be posted on the Web and when we will receive the published document from the printer. Most of these publications are based on SSA program data and appear within months of the end of the reference year. Two of the publications are based on a Census Bureau survey that becomes available within six months of data collection. The schedule also includes target dates for each major function in the production process, so that we can track the source of any problems in meeting the ultimate deadline. Finally, the schedule is updated annually to allow for changes in target dates. In FY 2002, target dates were modified to reflect the need for all publications to be section 508 compliant. Some dates are specified in terms of elapsed time

Appendix C

from the reference period of the data, others are fixed dates. However, no meaningful comparison can be made between our schedules and those of other agencies without conducting a detailed analysis of the complexity of the information being released and the resources available to produce it. Comparisons with commercial publishing operations would need to consider that commercial entities are not required to use the Government Printing Office or to be section 508 compliant. This performance measure is already resulting in shorter timeframes and reliable schedules for users. We will continue to look for ways to improve our processes.

Other Matters

Recommendation 6

Starting in FY 2002, SSA should consider establishing a quantitative goal (e.g., 95 percent of all publications should be produced within their established timetable) in order to evaluate whether the timeliness measure has been met.

Comment

This has now been done. SSA's goal for FY 2001 was to develop a baseline for this measure. SSA's goal for FY 2002 is to produce all publications on time.

Recommendation 7

SSA should put this metric on hold until the contractor develops a method for analyzing the survey data, developing the baseline metric, and using the metric to manage performance over a multi-year horizon. If these objectives cannot be satisfactorily completed, the metric should not be included in the GPRA measurement system.

Comment

See response to recommendation 1.

Recommendation 8

The Office of Research, Evaluation and Statistics (ORES) should pay careful attention to the manner in which survey results are combined.

Comment

We agree with the intent of this recommendation but not with trying to differentiate "significant" users from others. The contractor's report on the results of the customer satisfaction survey provides not only overall results but also results by four groups of

Appendix C

respondents (decisionmakers, subscribers, nonsubscribers, and stakeholders). The results show very little difference in outcomes across the four categories of respondents.

Recommendation 9

To further leverage the project management characteristics of this metric, it is recommended that ORES develop methods for obtaining status throughout the publishing process. Finally, it would be relatively easy to compare the timeliness of SSA statistical products with the on-time delivery of publications from other agencies. It is recommended that ORES decompose their publication process into major subtasks, as necessary, so that they can benchmark against other government and commercial publishing operations. In addition, ORES should expand the metric to include other documents. They should also develop a policy to address the change of target dates.

Comment

We have taken steps to address this recommendation. See our response to recommendation 5.

PERFORMANCE MEASURE SUMMARY SHEETS

Name of Measure	Measure Type	Strategic Goal/Objective
1) Percent of Customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness and responsiveness.	Percentage	<p>Goal: To promote valued, strong, and responsive social security programs and conduct effective policy development, research, and program evaluation.</p> <p>Objective: Provide information for decision makers and other on the Social Security and Supplemental Security Income programs through objective and responsive research, evaluation and policy development.</p>
Purpose	Survey Frequency	
To assess the percent of customers assigning a high rating to the quality of SSA's research and analysis products in terms of accuracy, reliability, comprehensiveness and responsiveness; SSA will develop a preliminary questionnaire to gather information from customers about the quality of research, analysis and evaluation products. SSA will also identify customers from whom feedback will be elicited.	The survey has not been developed at this point. SSA has not yet determined the frequency in which the survey will be administered.	
Target Goal	How Computed	Data Source
To develop a customer survey and data collection mechanism.	<p>This goal will be considered achieved if SSA:</p> <ul style="list-style-type: none"> a) Develops a survey that gathers information about whether research and analysis identifies new/emerging issues and provides accurate, reliable comprehensive and responsive research, analysis and evaluation products. b) Identifies customers from whom feedback will be elicited, and c) Creates a mechanism by which to administer the survey and process the data. 	SSA's Contractor

Appendix D

Designated Staff Members	Division
Michael A. Cronin Susan Grad John Woods	Office Policy (OP)

Testing and Results

We obtained an understanding of the underlying process and procedures surrounding the implementation of the measure through interviews and meetings with the appropriate SSA and its contractor personnel and by evaluating the following documentation:

- Contractor Statement of Work, dated July 2000.
- Most recent draft of the questionnaire, dated January 29, 2001
- Contractor's status report to SSA, Office of Policy, dated October 27, 2000, regarding: "Sample frame, initial recommendations for data collection, and plans for pretest and focus group."
- The Focus Group report, dated December 21, 2000.
- Memo from SSA's Contractor to SSA, Office of Policy, dated January 12, 2001, regarding "Proposed sampling plan, data collection plan, and initial data analysis plan." This memo provided a summary of recent developments and modifications to the original plan.

Refer to "Results of Evaluation" for a description of the findings.

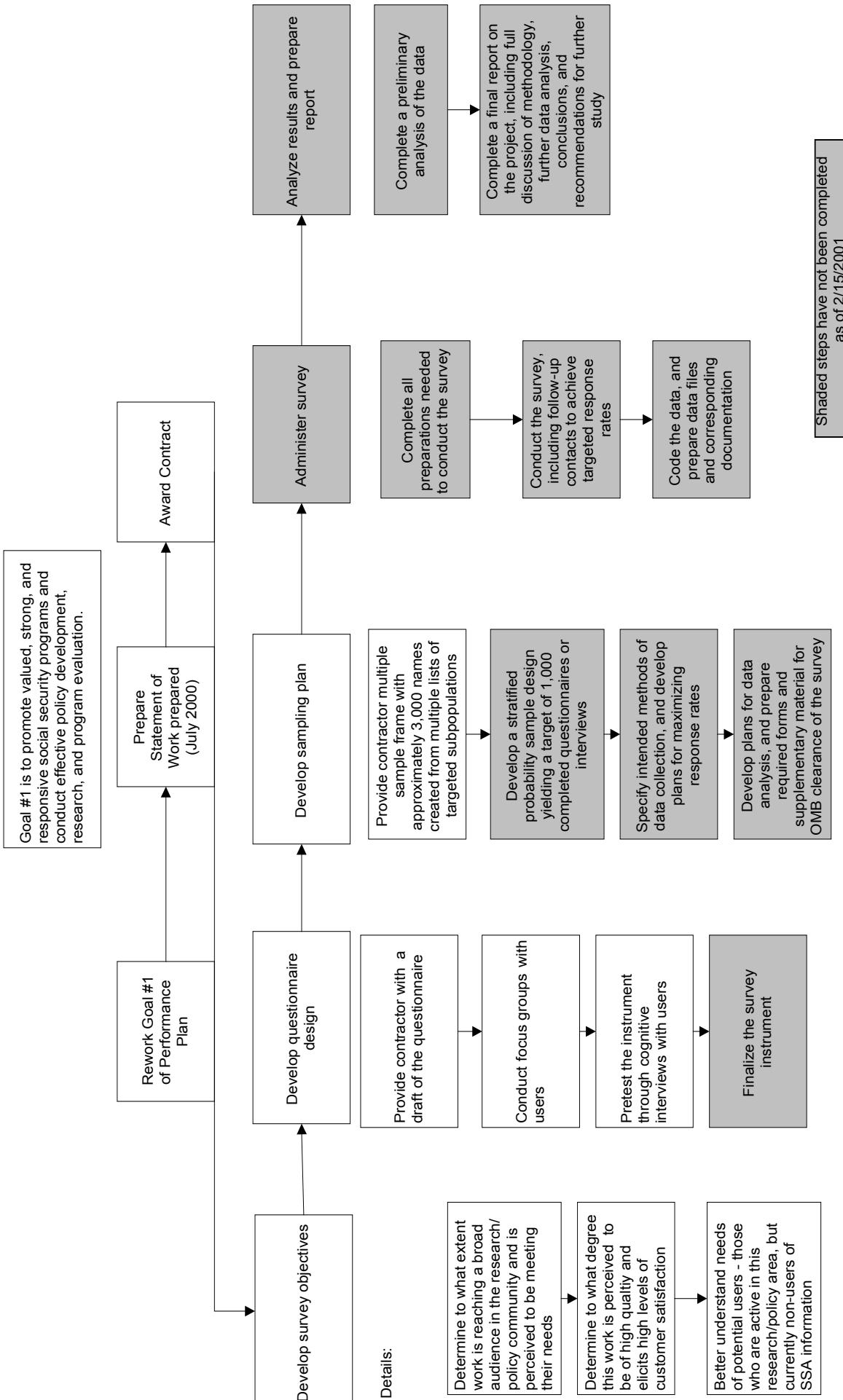
Appendix D

Name of Measure	Measure Type	Strategic Goal/Objective
2) Percent of major statistical products that are timely.	Percentage	<p>Goal: To promote valued, strong, and responsive social security programs and conduct effective policy development, research, and program evaluation.</p> <p>Objective: Provide information for decision makers and others on the Social Security and Supplemental Security Income programs through objective and responsive research, evaluation and policy development.</p>
Purpose	Frequency	
Measure of the extent to which SSA's major statistical products are produced in a timely manner.	Annual Indicator	
Target Goal	Data Source	
This goal will be considered achieved if SSA establishes a baseline for percent of major statistical projects that are produced on schedule.	Bureau of the Census SSA Office of Systems, Division of Program Studies	
Designated Staff Members	Division	
Susan Grad Alexander Estrin	OP ORES	
Testing and Results		
We obtained an understanding of the underlying process and procedures surrounding the implementation of the measure through interviews and meetings with the appropriate SSA personnel. In addition, we evaluated the following:		
	<ul style="list-style-type: none"> Memo from ORES regarding publication process and method used to establish timelines for publication Process/cycle memos for the publications to obtain an understanding of the publication process Refer to "Results of Evaluation" for a description of the findings. 	

PERFORMANCE MEASURE PROCESS MAPS

Appendix E

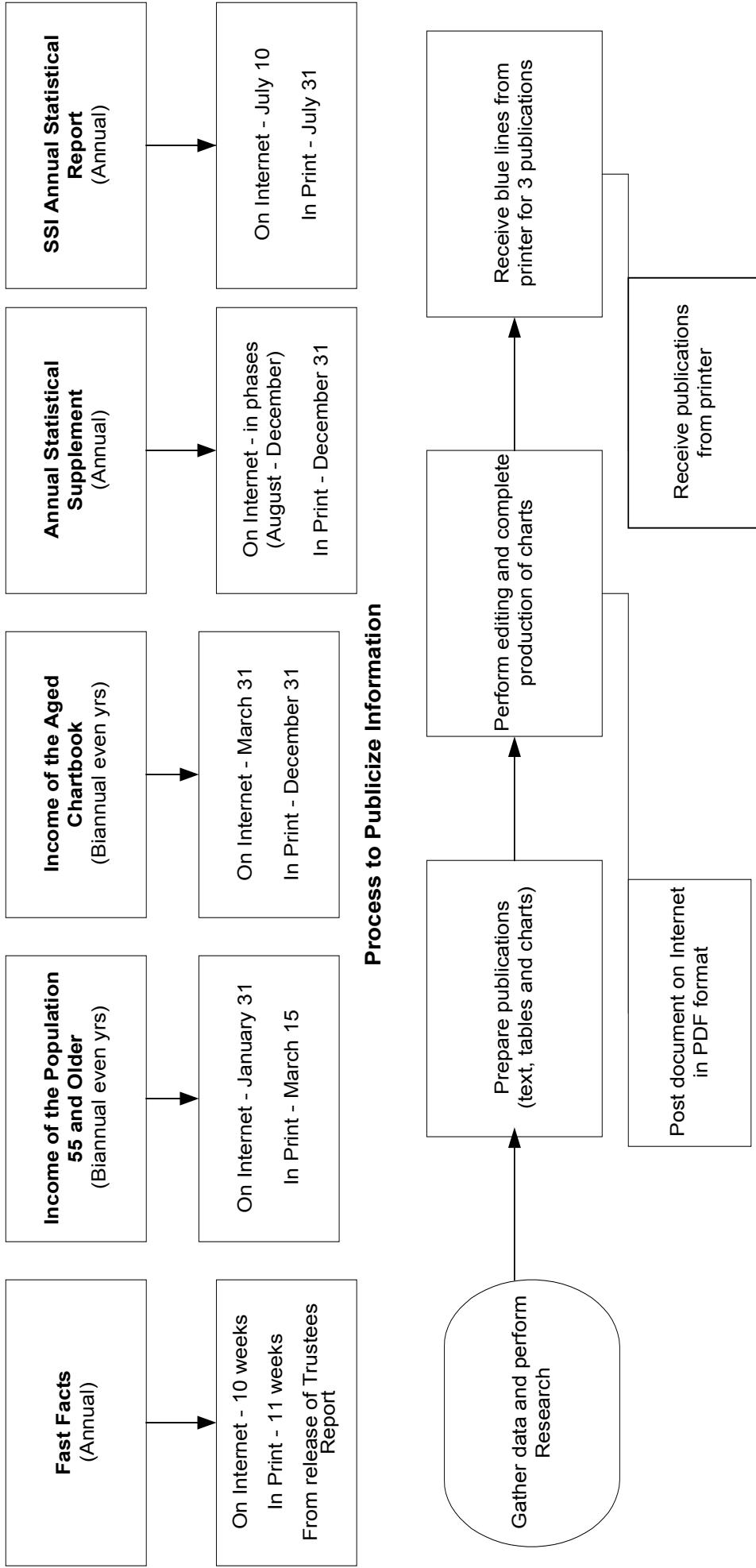
Performance Measure #1 Customer Satisfaction Survey



Appendix E

Performance Measure # 2 Publications To be Produced

- Goal #1 is to promote valued, strong, and responsive social security programs and conduct effective policy development, research, and program evaluation.

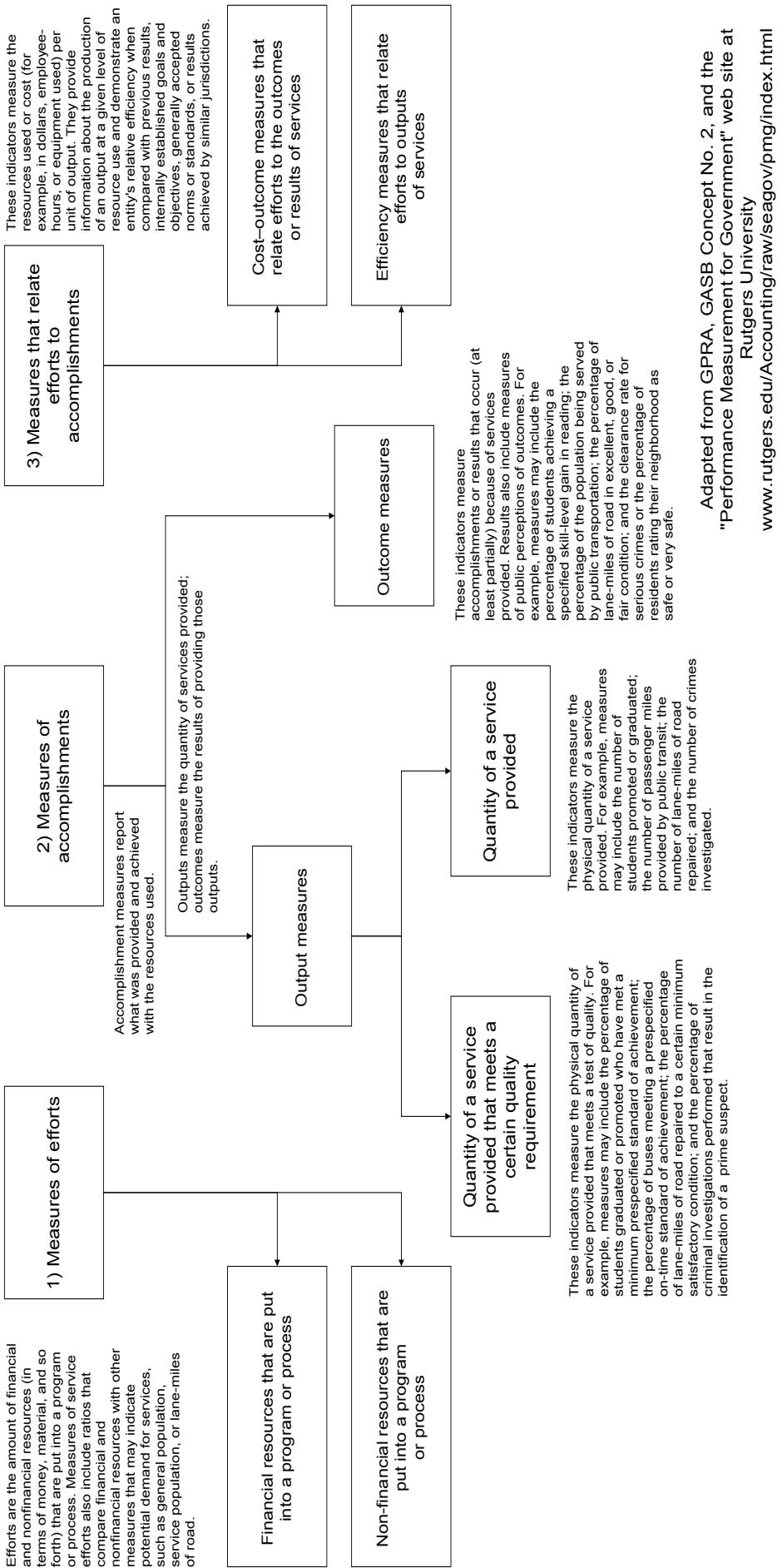


Appendix F

PERFORMANCE MEASURE TAXONOMY

Categories of Performance Measures:

Efforts are the amount of financial and nonfinancial resources (in terms of money, material, and so forth) that are put into a program or process. Measures of service efforts also include ratios that compare financial and nonfinancial resources with other measures that may indicate potential demand for services, such as general population, service population, or lane-miles of road.



DISTRIBUTION SCHEDULE

	<u>No. of Copies</u>
Commissioner of Social Security	1
Management Analysis and Audit Program Support Staff, OFAM	10
Inspector General	1
Assistant Inspector General for Investigations	1
Assistant Inspector General for Executive Operations	3
Assistant Inspector General for Audit	1
Deputy Assistant Inspector General for Audit	1
Director, Data Analysis and Technology Audit Division	1
Director, Financial Audit Division	1
Director, Western Audit Division	1
Director, Southern Audit Division	1
Director, Northern Audit Division	1
Director, General Management Audit Division	1
Issue Area Team Leaders	25
Income Maintenance Branch, Office of Management and Budget	1
Chairman, Committee on Ways and Means	1
Ranking Minority Member, Committee on Ways and Means	1
Chief of Staff, Committee on Ways and Means	1
Chairman, Subcommittee on Social Security	2
Ranking Minority Member, Subcommittee on Social Security	1
Majority Staff Director, Subcommittee on Social Security	2
Minority Staff Director, Subcommittee on Social Security	2
Chairman, Subcommittee on Human Resources	1
Ranking Minority Member, Subcommittee on Human Resources	1
Chairman, Committee on Budget, House of Representatives	1
Ranking Minority Member, Committee on Budget, House of Representatives	1
Chairman, Committee on Government Reform and Oversight	1
Ranking Minority Member, Committee on Government Reform and Oversight	1
Chairman, Committee on Governmental Affairs	1
Ranking Minority Member, Committee on Governmental Affairs	1

Chairman, Committee on Appropriations, House of Representatives	1
Ranking Minority Member, Committee on Appropriations, House of Representatives	1
Chairman, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, House of Representatives	1
Ranking Minority Member, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, House of Representatives	1
Chairman, Committee on Appropriations, U.S. Senate	1
Ranking Minority Member, Committee on Appropriations, U.S. Senate	1
Chairman, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, U.S. Senate	1
Ranking Minority Member, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, U.S. Senate	1
Chairman, Committee on Finance	1
Ranking Minority Member, Committee on Finance	1
Chairman, Subcommittee on Social Security and Family Policy	1
Ranking Minority Member, Subcommittee on Social Security and Family Policy	1
Chairman, Senate Special Committee on Aging	1
Ranking Minority Member, Senate Special Committee on Aging	1
Vice Chairman, Subcommittee on Government Management Information and Technology	1
President, National Council of Social Security Management Associations, Incorporated	1
Treasurer, National Council of Social Security Management Associations, Incorporated	1
Social Security Advisory Board	1
AFGE General Committee	9
President, Federal Managers Association	1
Regional Public Affairs Officer	1
Total	97

Overview of the Office of the Inspector General

Office of Audit

The Office of Audit (OA) conducts comprehensive financial and performance audits of the Social Security Administration's (SSA) programs and makes recommendations to ensure that program objectives are achieved effectively and efficiently. Financial audits, required by the Chief Financial Officers Act of 1990, assess whether SSA's financial statements fairly present the Agency's financial position, results of operations, and cash flow. Performance audits review the economy, efficiency, and effectiveness of SSA's programs. OA also conducts short-term management and program evaluations focused on issues of concern to SSA, Congress, and the general public. Evaluations often focus on identifying and recommending ways to prevent and minimize program fraud and inefficiency.

Office of Executive Operations

The Office of Executive Operations (OEO) supports the Office of the Inspector General (OIG) by providing information resource management; systems security; and the coordination of budget, procurement, telecommunications, facilities and equipment, and human resources. In addition, this office is the focal point for the OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act. OEO is also responsible for performing internal reviews to ensure that OIG offices nationwide hold themselves to the same rigorous standards that we expect from the Agency, as well as conducting employee investigations within OIG. Finally, OEO administers OIG's public affairs, media, and interagency activities and also communicates OIG's planned and current activities and their results to the Commissioner and Congress.

Office of Investigations

The Office of Investigations (OI) conducts and coordinates investigative activity related to fraud, waste, abuse, and mismanagement of SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, physicians, interpreters, representative payees, third parties, and by SSA employees in the performance of their duties. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

Counsel to the Inspector General

The Counsel to the Inspector General provides legal advice and counsel to the Inspector General on various matters, including: 1) statutes, regulations, legislation, and policy directives governing the administration of SSA's programs; 2) investigative procedures and techniques; and 3) legal implications and conclusions to be drawn from audit and investigative material produced by the OIG. The Counsel's office also administers the civil monetary penalty program.