

Office of the Inspector General

July 28, 2000

William A. Halter
Deputy Commissioner
of Social Security

Inspector General

Improving the Usefulness of the Social Security Administration's Death Master File
(A-09-98-61011)

Attached is a copy of our final report. The objective of the evaluation was to identify methods for improving the usefulness of the Social Security Administration's Death Master File for third-party users.

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

**IMPROVING THE USEFULNESS
OF SOCIAL SECURITY
ADMINISTRATION'S
DEATH MASTER FILE**

July 2000

A-09-98-61011

**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.

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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:

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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.

EXECUTIVE SUMMARY

OBJECTIVE

The objective of this evaluation was to identify methods for improving the usefulness of the Social Security Administration's (SSA) Death Master File (DMF) for third-party users.

BACKGROUND

SSA maintains an official repository of death information via the DMF, which is widely used in the public and private sectors. The DMF is part of the Numident, a master file that contains personal identifying information about each individual to whom SSA has assigned a Social Security number. SSA provides the DMF on computer tapes to third-party users. SSA created the DMF as the result of a 1978 lawsuit requiring the Agency to make death information available under the Freedom of Information Act. Congress also enacted legislation requiring that SSA provide death information to various Federal and State agencies in order to prevent erroneous payments to deceased individuals. SSA uses the DMF to fulfill these obligations.

SSA receives reports of death from a number of sources, such as friends and relatives of deceased individuals, funeral directors, financial institutions, and postal authorities. SSA processes these reports through its field offices and processing centers. In addition, SSA performs a computer match with death data from Federal and State agencies. The DMF contains information on all deaths reported to SSA for beneficiaries and nonbeneficiaries. For beneficiaries, SSA verifies the death before awarding survivors' benefits and obtains reasonable assurance about the death before terminating benefits and recording the death on its master payment files. For nonbeneficiaries, SSA does not verify the death information. In both cases, the information is recorded on the Numident and becomes part of the DMF.

RESULTS OF REVIEW

Our review disclosed that SSA's master payment files contained death information that had not been included in its DMF. In January 1998, SSA conducted a special project to match death information on the Master Beneficiary Record (MBR)¹ and Numident. The match identified about 2.2 million deaths on the MBR that were not recorded on the Numident. SSA subsequently recorded about 0.9 million of these deaths through a computer program that required personal identifying information on the two files to match within prescribed tolerances. As a result of data discrepancies, about 1.3 million

¹ The MBR is the master payment file for the Old-Age, Survivors and Disability Insurance program.

deaths remained unrecorded on the Numident. Thus, these deaths were not included on the DMF even though SSA had awarded or terminated benefits based on the accuracy of the death information.

We also found that the DMF did not identify which deaths had been sufficiently verified by SSA as a basis for awarding or terminating benefits. Although SSA verifies a death before awarding survivors' benefits and obtains reasonable assurance of a beneficiary's death before terminating benefits, this information is not provided on the DMF. Such information would be helpful to other agencies that use the DMF to detect and prevent erroneous payments to deceased individuals. For example, individuals may apply for benefits (e.g., food stamps) using the identity of a deceased person. Other agencies could identify such fraudulent activity and administer their programs more effectively if they were aware that SSA had performed sufficient verification to rely on the accuracy of the death information to award or terminate benefits.

CONCLUSIONS AND RECOMMENDATIONS

We concluded that SSA should initiate procedural changes in how it records death information on the DMF. These changes are necessary to ensure that SSA complies with legislative requirements and provides full disclosure of all death information in its possession. In addition, such changes would improve the usefulness of the DMF for third-party users and reduce the potential for erroneous payments to deceased individuals. Specifically, we recommend that SSA:

- Reconcile the 1.3 million deaths that were recorded on the MBR but not recorded on the Numident and ensure that, in the future, all deaths are included on the DMF.
- Annotate the DMF to identify which deaths have been sufficiently verified by the Agency prior to awarding or terminating benefits.

AGENCY COMMENTS AND OIG RESPONSE

In its response, SSA did not agree with our first recommendation. SSA stated that a manual reconciliation process would be extremely difficult and labor intensive. SSA also stated that payment accuracy is the highest priority of the Agency. Therefore, its efforts and resources have been directed towards ensuring the accuracy of the MBR, not the Numident. Although we agree that payment accuracy is important, we believe that SSA could improve the usefulness of the DMF by providing full disclosure of verified death information from the MBR to third-party users. We recognize that dedicating resources to reconcile prior death records on the MBR may not be as high of a priority as other day-to-day Agency workloads. However, the accuracy of this information is becoming more and more important to the combined Federal, State and local initiatives to detect and prevent identify theft. We therefore, believe the Agency should reconcile these files in the most expeditious and practical manner.

SSA agreed with our second recommendation. SSA stated that annotating the DMF to reflect which deaths have been proven or verified by the Agency would be helpful to other agencies that use the file to detect and prevent erroneous payments to deceased individuals. At its next Client/Enumeration 5-Year Plan Committee meeting, SSA agreed to request that this initiative be included in a future release of the Death Alert, Control, and Update System. The full text of SSA's comments is included in Appendix B.

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INTRODUCTION

OBJECTIVE

The objective of this evaluation was to identify methods for improving the usefulness of the Social Security Administration's (SSA) Death Master File (DMF) for third-party users.

BACKGROUND

SSA maintains death information for use in both the public and private sectors. The information is reported by various Federal, State, and private sources. SSA is required to collect and maintain this information by law. It is also required to make the death information available to other agencies to detect and prevent erroneous payments to deceased individuals.

The Death Master File

SSA created the DMF because of a 1978 lawsuit by Mr. Ronald Perholtz, a District of Columbia businessman. Mr. Perholtz requested death information so that he could sell it to other companies for their use in identifying deceased individuals. As a result of that lawsuit, SSA now maintains the DMF and provides the file on a cost-reimbursable basis under the Freedom of Information Act (FOIA). In addition, Congress enacted legislation requiring SSA to provide the DMF to Federal and State agencies that disburse federally funded benefits. The purpose of the law is to assist other agencies in preventing erroneous payments to deceased individuals.

SSA stores death information on the Numident, a master file that provides personal identifying information for each individual who has been issued a Social Security number (SSN). This information consists of the individual's full name, SSN, and date of birth. Generally, the place of birth and parents' full names are also included. SSA extracts information from the Numident and creates a complete DMF each quarter. The DMF is provided to third-party users via computer tapes. Each month, SSA provides a supplemental tape containing newly recorded deaths and any changes or deletions to the file.

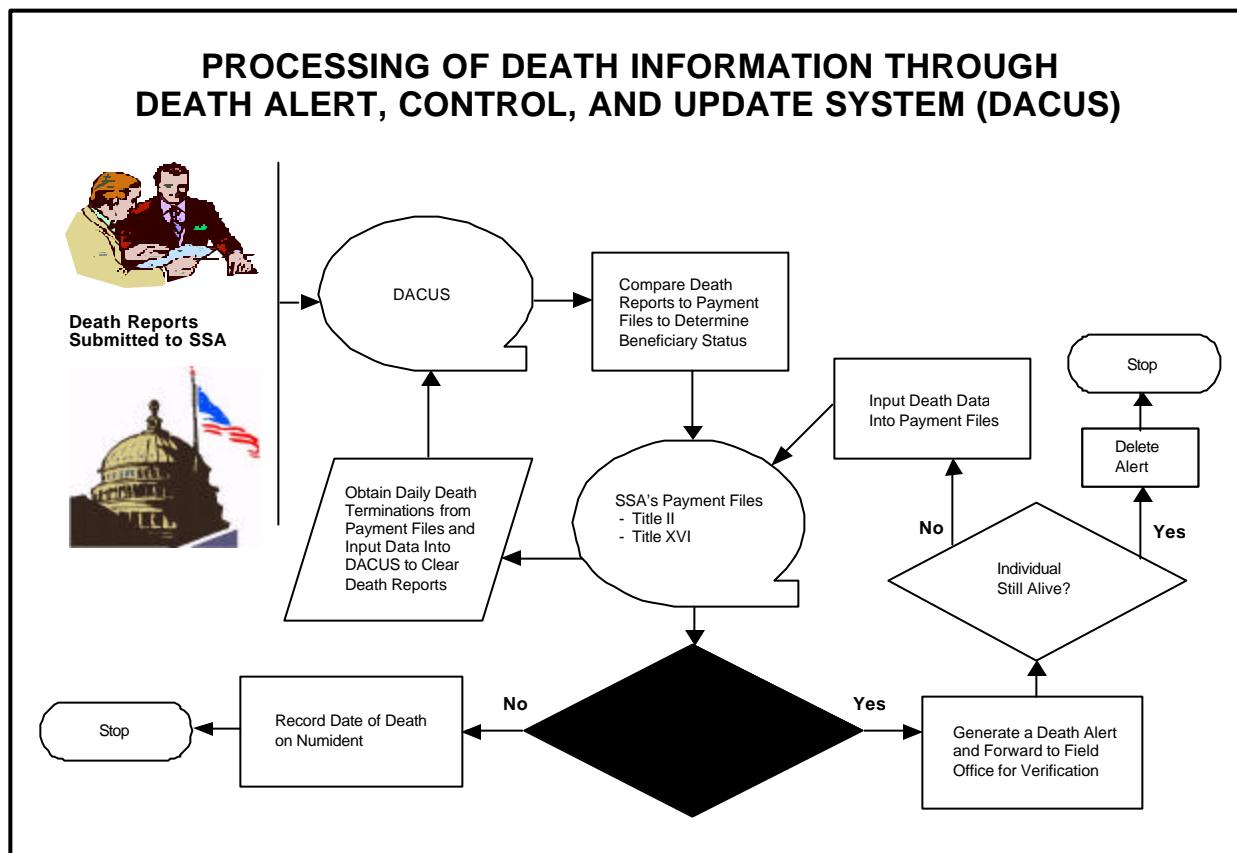
The DMF is distributed to 10 Federal agencies, including 4 that pay Federal benefits. The agencies use the file to identify deceased individuals who are receiving benefits. In addition, the DMF is released to the National Technical Information Service, which responds to FOIA requests. To limit its liability for erroneous information on the DMF, SSA places the following disclaimer on the file: "ATTENTION ALL USERS: Many of the items in this file have not been verified. You should not conclude that a person

listed in this file is necessarily deceased. This person may still be alive . . . Please verify every record before taking action on it . . . ”

Reporting and Processing of Death Information

About 2.3 million people die annually in the United States, of whom 1.9 million are SSA beneficiaries. SSA receives about 95 percent of its death reports from friends and relatives of deceased individuals, funeral directors, financial institutions, and postal authorities. This information is reported through SSA's field offices (FO) and processing centers. SSA also conducts a computer match of death data it receives from the Veterans Administration (VA), Health Care Financing Administration, and State agencies (e.g., bureaus of vital statistics and social services agencies) under contracts with the 50 States, Puerto Rico, District of Columbia, and New York City.

SSA's Death Alert, Control, and Update System (DACUS) processes the death information and performs the computer match with other Federal and State agencies. DACUS receives the death reports and compares them to SSA's payment files. If the comparison indicates that payments have been made after death or there is conflicting information about the date of death, DACUS issues an alert to the FO. The FO then determines the validity of the information and takes action, as appropriate, to terminate payments and correct SSA's records. If there is no conflicting information, DACUS records the death information on the Numident. The following flowchart provides an overview of DACUS.



Before processing the deaths through DACUS, SSA uses the Enumeration Verification System (EVS) to ensure that the same person was identified on the death report and the Numident record. EVS is a computer program that compares the personal identifying information between the death report and the matched Numident record to validate the identity of the person. EVS verifies and approves the match if the record satisfies specific criteria.

The matching criteria are complex and include tolerances for misspelled names and errors in the date of birth. The name-spelling tolerances include one-letter differences, transposition of two adjacent letters, an extraneous or missing letter, or a compound surname. The date-of-birth matching rules require either (1) the exact year of birth to match the year on the Numident, or (2) the year plus or minus 1 year and the exact month of birth to match. If an approved match is found, the death report is then processed through DACUS.

Legislative History

Under current law, States may restrict SSA from disclosing their death information to anyone except other Federal agencies that disburse benefits. Since 26 States, District of Columbia, and New York City have imposed this restriction, SSA maintains one DMF but releases two different copies of the file. One copy excludes death information supplied by the State bureaus of vital statistics. SSA makes this copy available under FOIA. The other copy is provided to Federal benefit-paying agencies, including the Department of Defense, Office of Personnel Management, Railroad Retirement Board (RRB), and VA. As of December 1998, this copy contained 62.6 million records.

Public Law 98-21, enacted in 1983, requires SSA to enter into contractual agreements to obtain State death records. It also sets forth the conditions under which SSA may provide State information to other Federal and State agencies. Further, it precludes using State information for purposes unrelated to administering benefit payments or disclosing it under FOIA.

The Omnibus Budget Reconciliation Act of 1993 amended the Internal Revenue Code to provide for sharing of State death records. This law stipulated that any State not allowing SSA to disclose all death records to other Federal benefit-paying agencies will no longer receive tax information from the Internal Revenue Service. It allowed SSA to share previously restricted State death records with selected Federal agencies because all States entered into agreements to allow such limited disclosure.

On September 7, 1993, the National Performance Review recommended that SSA become the “clearinghouse for death reporting and information.” One of the recommendations further encouraged data sharing by proposing that States be required to use SSA data if they disburse federally funded benefits. Another recommendation was that SSA negotiate agreements with the States to permit disclosure of death data to other Federal, State, and local agencies.

Public Law 105-379, enacted in 1998, requires State agencies that issue food stamps to enter into cooperative arrangements with the Commissioner of Social Security. These arrangements enable the agencies to obtain death information from SSA to prevent the issuance of food stamps to deceased individuals. This law increased the importance of the DMF. As a result, death information will be distributed to an additional 53 agencies (50 States plus District of Columbia, Guam, and Virgin Islands), which provide about \$25.8 billion in food stamps annually to an estimated 23.4 million recipients.

SCOPE AND METHODOLOGY

To accomplish our objective, we:

- conducted interviews with employees from SSA's Headquarters, including the Office of Program Benefits, Office of Systems Requirements, Office of Systems Design and Development, Office of Public Service and Operations Support, Office of Retirement Policy, Office of Congressional Relations, and Office of Quality Assurance and Performance Assessment;
- reviewed applicable sections of the Social Security Act, Public Laws, Code of Federal Regulations, Office of Management and Budget bulletins, and SSA's Program Operations Manual System;
- obtained a legal opinion about SSA's responsibilities for the accuracy of the DMF;
- conducted interviews with employees from VA and RRB; and
- reviewed prior audit and evaluation reports related to the DMF issued by the General Accounting Office (GAO), VA's Office of Inspector General (OIG), Department of Health and Human Services' OIG, and SSA's OIG.

In addition, we obtained information from SSA employees about the reporting and processing of death data through DACUS. We also obtained information about the DMF, including the results of SSA's special project to identify deaths recorded on the Master Beneficiary Record (MBR) that were not recorded on the Numident as of January 1998. Because SSA only retained summarized data for the project, we did not verify the accuracy of that information.

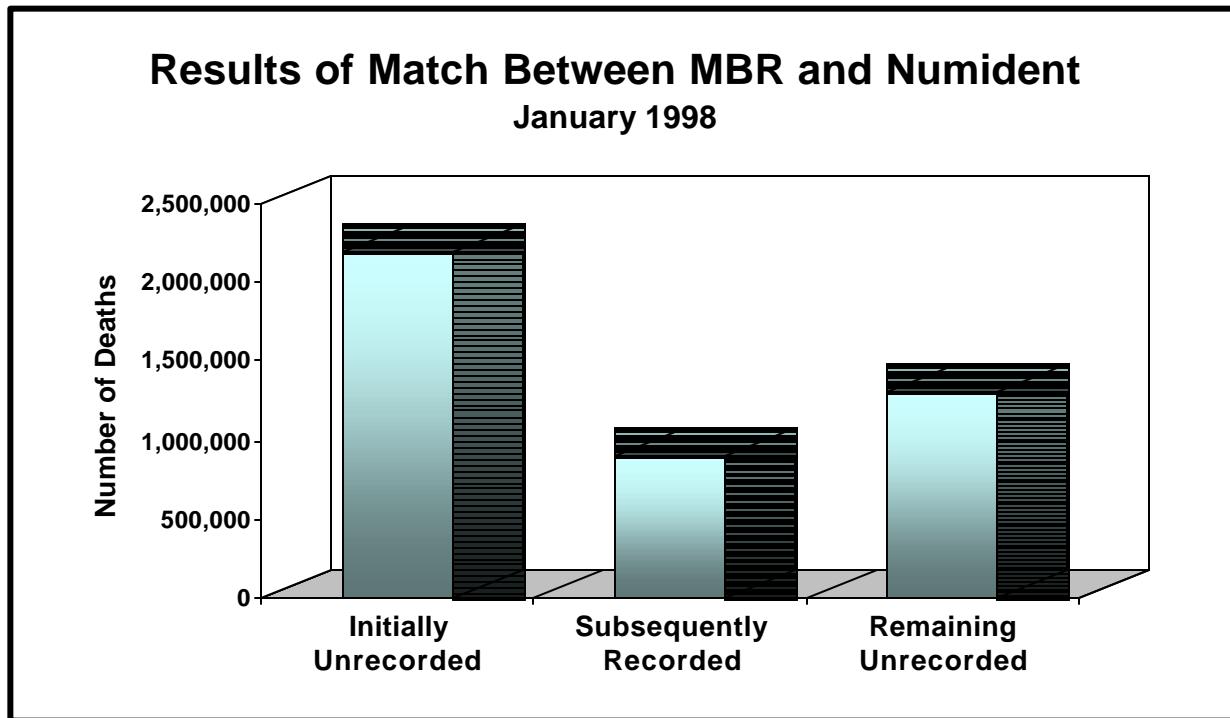
We performed field work in Baltimore, Maryland, and Richmond, California, from November 1998 to July 1999. We conducted our evaluation in accordance with the ***Quality Standards for Inspections*** issued by the President's Council on Integrity and Efficiency.

RESULTS OF REVIEW

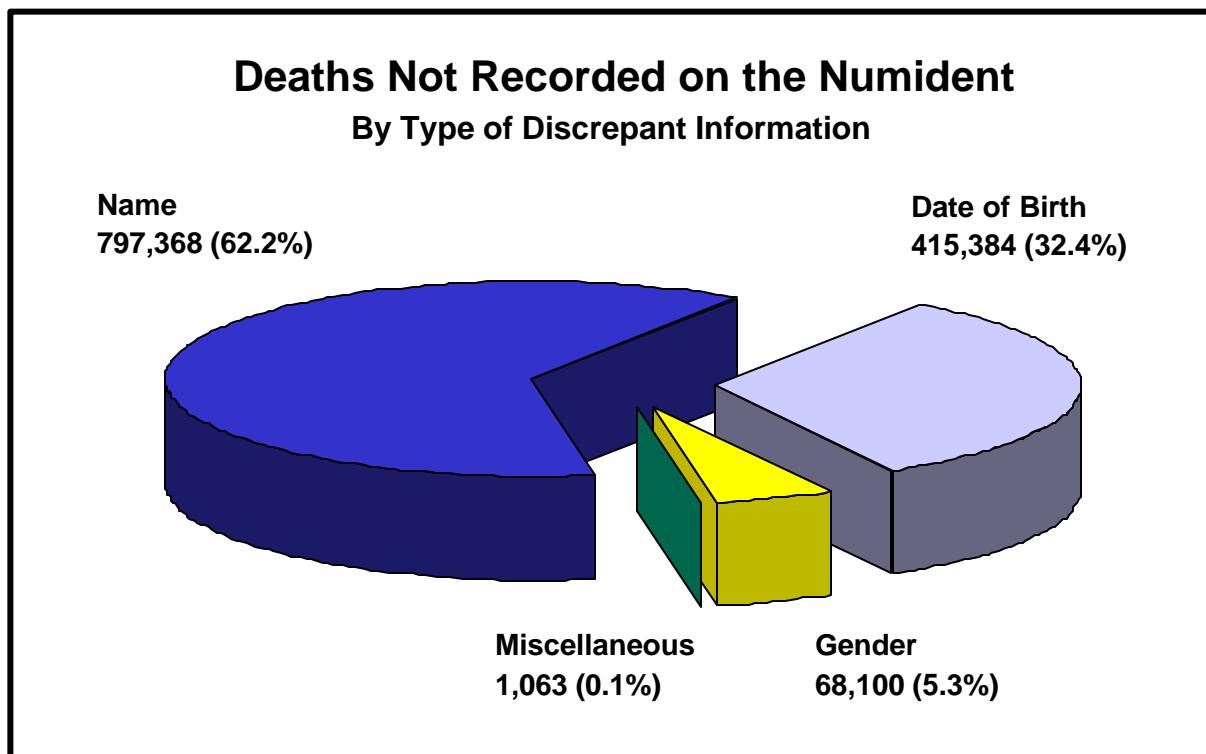
SSA could improve the usefulness of the DMF by including additional deaths on the file and indicating which deaths it had already verified. Specifically, we found that SSA did not record about 1.3 million deaths on the Numident. Therefore, these deaths were omitted from the DMF. In addition, the DMF did not identify which deaths had been sufficiently verified by SSA as a basis for awarding or terminating benefits. Such information would assist other agencies in detecting and preventing erroneous payments to deceased individuals.

SOME DEATHS WERE NOT RECORDED ON THE DMF

Our review disclosed that SSA's master payment files contained death information that had not been included in its DMF. In January 1998, SSA conducted a special project to match death information on the MBR and Numident. The match identified about 2.2 million deaths on the MBR that were not recorded on the Numident. SSA subsequently recorded about 0.9 million of these deaths through a computer program that required personal identifying information on the two files to match within prescribed tolerances. As a result of data discrepancies, about 1.3 million deaths remained unrecorded on the Numident. Thus, these deaths were not included on the DMF even though SSA had awarded or terminated benefits based on the accuracy of the death information. The results of the special project are summarized below.



SSA conducted the match to ensure that deaths recorded on the MBR were also recorded on the Numident and included on the DMF. For the 1.3 million unrecorded deaths, the personal identifying information on the MBR and Numident did not match within prescribed tolerances. The matching criteria required the first seven letters of the first and last names, month and year of birth, and gender to match exactly before recording the death information on the Numident. We were unable to examine these records because SSA did not retain the results of the special project. However, SSA provided us with a breakdown of the 1.3 million unrecorded deaths. As depicted in the following chart, about 62 percent of the records did not match due to differences in name, another 32 percent did not match due to differences in the date of birth, and about 5 percent did not match due to differences in gender.



SSA employees² informed us that differences in names could result from various events. For example, a person may use a full legal name when applying for a SSN and that name would appear on the Numident. Later, when applying for benefits, that person may use a variation of the full legal name and that variation would appear on the MBR. Thus, the MBR and Numident would have different first names. Another example would be a woman who marries and assumes her spouse's last name. If she applied for her SSN under her maiden name and applied for benefits under her married name, the MBR and Numident would have different last names. In addition, an immigrant may shorten a long last name or change its spelling over a period of time. Consequently, this individual could have different names on the MBR and Numident.

² Including staff members from the Office of Systems Requirements and Office of Systems Design and Development.

SSA employees³ also stated that the date of birth could be different for a number of reasons. When applying for an SSN, immigrants may have weak evidence of the actual date of birth. Later, when applying for benefits, better evidence of the date of birth is provided, but the Numident may not have been updated. As a result, the date of birth on the Numident is incorrect while the MBR contains the correct date. Further, prior to 1971, SSA did not require proof of age when applying for an SSN. Thus, some individuals may have reported their dates of birth incorrectly to enter the military or for other purposes. However, when they applied for benefits, their true dates of birth were used. The differences in gender were attributed to clerical errors.

We believe that SSA could improve the usefulness of the DMF by resolving the discrepancies for the deaths that were included on the MBR but excluded from the Numident. Regardless of the name, gender, and date of birth on the Numident, SSA had sufficient personal identifying information to pay benefits to these individuals and obtained reasonable assurance about the death before it terminated their payments or awarded benefits to eligible survivors. Unless these discrepancies are properly resolved and recorded on the DMF, individuals could assume the identities of deceased beneficiaries to defraud the Social Security program. Therefore, we recommend that SSA reconcile the 1.3 million deaths that were recorded on the MBR but not recorded on the Numident and ensure that, in the future, all deaths are included on the DMF.

VERIFICATION OF DEATHS SHOULD BE DISCLOSED

We found that the DMF did not identify which deaths had been sufficiently verified by SSA as a basis for awarding or terminating benefits. Although SSA verifies a death before awarding survivors' benefits and obtains reasonable assurance of a beneficiary's death before terminating benefits, this information is not provided on the DMF. Such information would be helpful to other agencies that use the DMF to detect and prevent erroneous payments to deceased individuals. For example, individuals may apply for benefits (e.g., food stamps) using the identity of a deceased person. Other agencies could identify such fraudulent activity and administer their programs more effectively if they were aware that SSA had performed sufficient verification to rely on the accuracy of the death information to award or terminate benefits.

Before awarding survivor benefits, SSA requires proof of the worker's death. Generally, such proof must consist of a certified copy of the public record of death, written statement by the attending physician, certified copy of the coroner's report of death, or written statement from the funeral director. Thus, SSA can be reasonably certain that the death occurred and information about the death is accurate before it awards benefits.

Likewise, SSA obtains reasonable assurance that the reported death of a beneficiary has occurred before terminating benefits. For example, if the report of death is received by mail, telephone, or in person, SSA ensures that the report is from a competent

³ *Ibidem.*

source (i.e., representative payee, funeral director, relative, or friend). SSA also ensures that the report contains the name, SSN, and sufficient information to make the determination that the individual is deceased.

Recent legislation requires SSA to provide death data to State food stamp agencies to ensure that food stamp coupons are not issued to deceased individuals.⁴ The DMF will be distributed to these agencies for the purpose of detecting and preventing such fraudulent activity. In 1998, GAO identified about 26,000 deceased individuals in four States who were included in households receiving food stamps. GAO estimated that these households improperly received about \$8.5 million in food stamp benefits over a 2-year period.⁵ Knowing that SSA had relied on the accuracy of death information to award or terminate benefits would provide the State agency with additional assurance that the individual was actually deceased. This assurance should allow the agency to process actions more timely and efficiently.

We believe that SSA expends considerable effort to obtain reasonable assurance about the death of an individual when it affects the initial eligibility for or continuing entitlement to Social Security benefits. Other agencies should have the opportunity to benefit from this effort, thereby reducing the potential for fraud, waste, and abuse. Accordingly, we recommend that SSA annotate the DMF to identify which deaths have been sufficiently verified by the Agency prior to awarding or terminating benefits.

⁴ Public Law 105-379, section 1, 112 Stat. 3399.

⁵ "Food Stamp Overpayments: Thousands of Deceased Individuals are Being Counted as Household Members," GAO/RCED-98-53, February 1998.

CONCLUSIONS AND RECOMMENDATIONS

We concluded that SSA should initiate procedural changes in how it records death information on the DMF. These changes are necessary to ensure that SSA complies with legislative requirements and provides full disclosure of all death information in its possession. In addition, such changes should improve the usefulness of the DMF for third-party users and reduce the potential for erroneous payments to deceased individuals. Specifically, we recommend that SSA:

1. Reconcile the 1.3 million deaths that were recorded on the MBR but not recorded on the Numident and ensure that, in the future, all deaths are included on the DMF.
2. Annotate the DMF to identify which deaths have been sufficiently verified by the Agency prior to awarding or terminating benefits.

AGENCY COMMENTS AND OIG RESPONSE

In its response, SSA did not agree with our first recommendation. SSA stated that a manual reconciliation process would be extremely difficult and labor intensive. SSA also stated that payment accuracy is the highest priority of the Agency. Therefore, its efforts and resources have been directed towards ensuring the accuracy of the MBR, not the Numident. Although we agree that payment accuracy is important, we believe that SSA could improve the usefulness of the DMF by providing full disclosure of verified death information from the MBR to third-party users. We recognize that dedicating resources to reconcile prior death records on the MBR may not be as high of a priority as other day-to-day Agency workloads. However, the accuracy of this information is becoming more and more important to the combined Federal, State and local initiatives to detect and prevent identify theft. We therefore, believe the Agency should reconcile these files in the most expeditious and practical manner.

SSA agreed with our second recommendation. SSA stated that annotating the DMF to reflect which deaths have been proven or verified by the Agency would be helpful to other agencies that use the file to detect and prevent erroneous payments to deceased individuals. At its next Client/Enumeration 5-Year Plan Committee meeting, SSA agreed to request that this initiative be included in a future release of the Death Alert, Control, and Update System. The full text of SSA's comments is included in Appendix B.

APPENDICES

ACRONYMS

DACUS	Death Alert, Control, and Update System
DMF	Death Master File
EVS	Enumeration Verification System
FO	Field Office
FOIA	Freedom of Information Act
GAO	General Accounting Office
MBR	Master Beneficiary Record
OIG	Office of the Inspector General
RRB	Railroad Retirement Board
SSA	Social Security Administration
SSN	Social Security Number
VA	Veteran's Administration

APPENDIX B

AGENCY COMMENTS

COMMENTS ON THE OFFICE OF INSPECTOR GENERAL (OIG) DRAFT REPORT,
"IMPROVING THE USEFULNESS OF THE SOCIAL SECURITY ADMINISTRATION'S
DEATH MASTER FILE" (A-09-98-61011)

Recommendation 1

Reconcile the 1.3 million deaths that were recorded on the Master Beneficiary Record (MBR) but not recorded on the Numident and ensure that, in the future, all deaths are included on the Death Master File (DMF).

Comment

We do not agree. A manual reconciliation process would be extremely difficult and labor intensive. The process would involve securing SS-5s (Application for Social Security number) for each of the 1.3 million deceased beneficiaries and developing evidence to verify their identity before we could match the names on the payment record and the names on the Numident. In most cases, the descendants' MBR addresses are too old to use as a means to contact surviving family members. Payment accuracy is our highest priority and, therefore, our efforts and resources have been directed towards ensuring the accuracy of the MBR. With regard to the DMF, as you note in your report, we include a disclaimer for users of this file that states that the information may not be accurate because SSA does not verify death information for non-beneficiaries.

Recommendation 2

Annotate the DMF to identify which deaths have been sufficiently verified by the Agency prior to awarding or terminating benefits.

Comment

We agree that annotating the DMF to reflect which deaths the Agency has proven or verified has merit and would be helpful to other agencies that use DMF data to detect and prevent erroneous payments to deceased individuals.

The necessary documents will be submitted to the Client/Enumeration 5-Year Plan Committee requesting that this initiative be included in a future release of the Death Alert, Control and Update System. The Committee's next expected meeting to evaluate new submissions will take place late Summer 2000. At that time, a determination will be made on where this initiative will be placed in the Agency's enumeration/client priorities.

OIG CONTACT AND STAFF ACKNOWLEDGMENTS

OIG Contacts

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Acknowledgements

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Cheryl Robinson, Writer-Editor, Policy, Planning and Technical Services

For additional copies of this report, please contact the Office of the Inspector General's Public Affairs Specialist at (410) 966-5998. Refer to Common Identification Number A-09-98-61011.

APPENDIX D

SSA ORGANIZATIONAL CHART

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Social Security Advisory Board	1
AFGE General Committee	9
President, Federal Managers Association	1
Regional Public Affairs Officer	1
Total	98

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) provides four functions for the Office of the Inspector General (OIG) – administrative support, strategic planning, quality assurance, and public affairs. OEO supports the OIG components by providing information resources management; systems security; and the coordination of budget, procurement, telecommunications, facilities and equipment, and human resources. In addition, this Office coordinates and is responsible for the OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act. The quality assurance division performs internal reviews to ensure that OIG offices nationwide hold themselves to the same rigorous standards that we expect from the Agency. This division also conducts employee investigations within OIG. The public affairs team communicates OIG's planned and current activities and the results to the Commissioner and Congress, as well as other entities.

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.