
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**THE SOCIAL SECURITY ADMINISTRATION'S
DECISIONS TO TERMINATE COLLECTION
EFFORTS FOR OLD-AGE, SURVIVORS
AND DISABILITY INSURANCE OVERPAYMENTS**

March 2006

A-13-05-15029

AUDIT REPORT



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SOCIAL SECURITY

MEMORANDUM

Date: March 22, 2006

Refer To:

To: The Commissioner

From: Inspector General

Subject: The Social Security Administration's Decisions to Terminate Collection Efforts for Old-Age, Survivors and Disability Insurance Overpayments (A-13-05-15029)

OBJECTIVE

Our objective was to determine whether the Social Security Administration's (SSA) decisions to terminate collection efforts for Old-Age, Survivors and Disability Insurance (OASDI) overpayments recorded in the Recovery of Overpayments, Accounting and Reporting (ROAR) system were in accordance with its policies and procedures.

BACKGROUND

SSA's stated mission is to advance the economic security of the nation's people through leadership in managing America's Social Security programs. To accomplish this, SSA has promulgated four comprehensive strategic goals, one of which is to ensure superior stewardship of Social Security programs and resources. To advance that strategic goal, SSA has made the improvement of debt management a strategic objective with specific outcomes measured in the percent of outstanding debt that is in a collection arrangement.¹ In Fiscal Years (FY) 2003 and 2004, SSA reported that 39.8 and 42.2 percent, respectively, of OASDI program debt was in a collection arrangement.

SSA defines an overpayment as the amount an individual received for any period that exceeded the total amount that should have been paid for that period. Once a determination of overpayment is made, the overpayment is a debt owed to the Government.² As a part of its stewardship responsibilities, SSA needs to prevent overpayments, and, when they do occur, take actions to recover them.

¹ SSA defines OASDI program debt in a collection arrangement as a debt that is scheduled for collection by benefit withholding or installment payment (SSA's FY 2005 Annual Performance Plan page 27).

² SSA's Programs Operations Manual (POMS), GN 02201.001A, see also section 204(a) of the Social Security Act, 42 U.S.C. §404(a), 20 C.F.R. §§ 404.501-.545.

When SSA determines an overpayment has been made, it must notify all individuals from whom it will seek recovery of the overpayment. The notice explains the individual has the right to contest the determination or request a waiver of the overpayment.³ If the Agency's overpayment decision is not changed or a waiver is not granted, SSA must pursue recovery by adjusting current benefit payments or seeking collection through one of several methods described in its policies and procedures.⁴ SSA also has the authority to discontinue recovery efforts if the overpayment is not over \$100,000 and was not obtained by fraud.⁵

SSA policies and procedures provide guidelines for pursuing collection of an overpayment and when recovery efforts may be discontinued. Full and immediate refund is the preferred method of recovery.⁶ The next option is to seek recovery by adjusting benefits of the beneficiary who was overpaid. If the person who was overpaid is not receiving benefits, other individuals living at the same address as the primary beneficiary who are receiving benefits on the same earnings record are liable for repaying the debt to the extent of the benefits they are receiving.⁷ These individuals are referred to as contingently liable beneficiaries.⁸

When there are no benefits to adjust for debt collection, SSA sends the debtor a letter requesting payment in full or by installments. If unsuccessful, SSA uses an automated system to generate a series of progressively stronger follow-up notices. If the debt remains delinquent, SSA pursues debt collection with the assistance of other organizations, such as the Department of the Treasury, to offset the debt from other Federal benefit payments.⁹ Agency policy also allows for reporting the debt to credit bureaus or employers for wage garnishment.¹⁰

³ 20 Code Federal Regulations (CFR) 404.502a.

⁴ 42 U.S.C. §404, 20 C.F.R. §§ 404.502, 404.520, 404.527, 422.310, 422.403.

⁵ The Federal Claims Collection Act of 1966, 31 U.S.C. 3711(a)(3) and (b)(1), provides that SSA has authority to suspend or terminate collection efforts when the overpayment does not exceed \$100,000 and did not result from fraud.

⁶ POMS, GN 02210.150A.

⁷ POMS. GN 02210.217A.1.a, GN 02205.001.

⁸ POMS, GN 02205.005A.

⁹ 20 C.F.R. §§ 404.520

¹⁰ SSA FY 2003 Performance and Accountability Report, 20 C.F.R. §§ 422.301-.445.

When repayment cannot be arranged and pursuing a civil lawsuit is not appropriate, SSA may discontinue collection efforts under any one of the following conditions: (1) the debtor cannot repay, (2) the debtor cannot be located after a diligent search, or (3) the costs of collection efforts are likely to exceed the cost of the amount recovered.¹¹ When debt collection is discontinued for one of these reasons, the debt is written off. However, the debt is still subject to future collection and may be recovered, in whole or in part, if the debtor returns to payment status or through the use of external collection sources.

SSA uses ROAR to control the recovery and collection of its overpayments, misused fund cases, conserved funds cases, and civil monetary penalty cases. For example, ROAR contains overpayment amounts, collection status of overpayments, remittance agreements, and information about individuals liable for the debts. Further, ROAR discontinues debt collection activities. When this occurs, the special transaction code "TC71" is recorded in the system.

RESULTS OF REVIEW

Our review indicated that, in general, SSA terminated collection efforts for overpayments in accordance with its policies and procedures. However, we found compliance problems in 29 (11.6 percent) of the debt termination records we reviewed. SSA terminated collection efforts for some overpayments when contingently liable beneficiaries were receiving benefit payments. There was no indication that SSA sought to adjust these benefit payments before it terminated collection efforts. We also found some records where, contrary to policy, there was no documentation to indicate SSA (1) checked for an estate for possible recovery in cases where the debtor had died or (2) made required contacts or attempted contacts with the debtor before terminating collection efforts.

We obtained a November 2004¹² electronic data extract of 61,564 OASDI overpayment terminations recorded in ROAR in FY 2003. This data extract represented about \$285 million in OASDI overpayment terminations. From this population, we randomly selected 250 overpayment termination records totaling \$1,136,179 for review (see Appendices B and C).

Based on the results of our review, we estimate that, in FY 2003, about 7,100 decisions were made in which SSA terminated collection efforts for OASDI overpayments not in accordance with its own policies and procedures or lacking required documentation. We estimate these decisions represent about \$29.6 million in OASDI debt.¹³

¹¹ POMS, GN 02215.235, 31 U.S.C. § 3711, 20 C.F.R. §404.515(a).

¹² The data extract was obtained from the Social Security records as of November 24, 2004.

¹³ This figure represents terminated collection efforts at a given point in time. Collection efforts may go in and out of that status on many occasions, even within the same FY. The overpayment may still be recovered even after a termination of collection action per POMS, GN 02215.250A.

**Debt Terminated
When Contingently
Liable Beneficiaries
Existed**

Of the 250 OASDI debt termination records reviewed, we found SSA terminated 13 debts (5.2 percent) when contingently liable beneficiaries were collecting benefit payments. These 13 debt termination records totaled about \$26,000 in overpayments.

We examined termination records and could not find documentation that SSA considered contingent liability and found it not applicable. According to SSA policies,¹⁴ collection efforts should be pursued against contingently liable beneficiaries before collection efforts are terminated.

For example, 1 of the 13 records we examined involved a primary beneficiary who had a \$10,396 overpayment. Collection efforts were terminated in August 2003. At the time, the primary beneficiary had a spouse who was collecting benefit payments on the same earnings record. The spouse continued to receive benefit payments without adjustment while overpayment collection efforts were terminated.

SSA staff acknowledged there are no systems controls to prevent a termination of collection action while a potentially contingently liable beneficiary is in current pay status. Agency staff explained SSA completes an annual “automated sweep” of its beneficiaries’ records to identify debt collection that has been terminated, but either the debtor became reentitled to benefits or a contingently liable beneficiary was entitled on the same earnings record. SSA reported its FY 2003 automated sweep produced 10,649 alerts totaling about \$17.4 million in overpayments in which collection efforts were terminated. These alerts were referred to SSA operational staff for further review. SSA staff indicated the annual automated sweep would identify overpayments where the contingently liable person was collecting benefit payments and produce alerts to determine whether collection efforts should be resumed. However, we were unable to obtain management information to determine whether operational staff reviewed these alerts and took appropriate action.

Also, the Debt Management System¹⁵ (DMS) asks a series of questions before debt can be terminated to facilitate the consideration of collecting overpayments from contingently liable beneficiaries. However, the system does not prevent the termination of overpayments when there are contingently liable beneficiaries to pursue for possible debt collection. Further, DMS does not generate evidence that staff considered this issue or why collection efforts were not pursued against these beneficiaries.

¹⁴ POMS, GN 02205.005, GN 02210.007, GN 02210.015.

¹⁵ DMS was implemented as part of SSA’s plans to modernize all of SSA programs/systems that are responsible for controlling, maintaining, and accounting for programmatic debts. The modernization was in response to the President’s directive that all Federal agencies begin an aggressive program in the area of debt collection.

Based on the results of our review, we estimate that, in FY 2003, about 3,200 decisions were made in which SSA terminated collection efforts when contingently liable beneficiaries were collecting benefits. We estimate these decisions represent about \$6.5 million in OASDI debt.

Lack of Required Documentation Before Terminating Debt

Of the 250 OASDI debt termination records reviewed, we found 16 (6.4 percent) lacked required documentation before collection efforts were terminated. These 16 debt termination records totaled about \$94,000 in overpayments. In 12 of the 16 termination records, the debtors had died, but we could not find documentation that SSA determined whether an estate

existed as a possible source for debt recovery. Agency policy states that this is required for debts of \$600 or more before collection efforts can be terminated.¹⁶ Also, in 4 of the 16 debt termination records examined, collection efforts were terminated without appropriate documentation that the debtors were contacted regarding repayment of the debt. SSA policies and procedures for terminating collection efforts require that efforts to collect a debt (for example, report of face-to-face contacts, documentation of financial circumstances, correspondence to and from the debtor) be documented in SSA's records.¹⁷ We examined the DMS records and the claimant folders and found there was no documentation indicating SSA made certain contacts before it terminated collection efforts.

The following are examples of records we examined where we found missing required documentation. In one instance, the primary beneficiary died in July 2002. SSA terminated collection efforts on the \$17,039 overpayment in March 2003. We were unable to find evidence SSA determined whether an estate existed before it terminated collection efforts. In another instance, a primary beneficiary found no longer disabled had collection efforts terminated for a \$4,473 overpayment in April 2003. We found no documentation of required debtor contacts with the beneficiary.

Based on the results of our review, we estimate that, in FY 2003, about 3,900 decisions were made in which SSA terminated collection efforts without the required documentation. We estimate these decisions represent about \$23.1 million in OASDI debt.

¹⁶ POMS, GN 02215.050.

¹⁷ POMS, GN 02215.235.

CONCLUSION AND RECOMMENDATIONS

SSA needs to improve compliance with its policies and procedures concerning decisions to terminate collection efforts for OASDI overpayments. Enhanced compliance could increase the amount of debt collected. Improvement in OASDI debt collection would help SSA in achieving its strategic objective of improving its debt management, as well as strengthen its stewardship of the Social Security programs.

To help improve compliance with OASDI debt termination policies and procedures, we recommend that SSA:

1. Take action to ensure compliance with existing policies and procedures regarding contingently liable beneficiaries before terminating collection actions, such as periodic issuance of reminders to staff.
2. Take action to ensure compliance with existing policies and procedures to document contacts before terminating collection efforts, such as periodic issuance of reminders to staff. These include contacts with the debtor, and where the debtor is deceased, contacts checking for an estate when the overpayment was \$600 or more.

AGENCY COMMENTS

The Agency agreed with our recommendations. The full text of the Agency's comments is included in Appendix D.



Patrick P. O'Carroll, Jr.

Appendices

APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Sampling Methodology and Results

APPENDIX D – Agency Comments

APPENDIX E – OIG Contacts and Staff Acknowledgments

Appendix A

Acronyms

DMS	Debt Management System
FY	Fiscal Year
OASDI	Old-Age, Survivors and Disability Insurance
POMS	Programs Operations Manual System
ROAR	Recovery of Overpayments, Accounting and Reporting System
SSA	Social Security Administration

Scope and Methodology

To accomplish our objective, we:

- Reviewed Federal laws, regulations, and Social Security Administration (SSA) policies and procedures governing overpayments.
- Obtained a data extract for termination of collection effort transactions for distinct overpayment events recorded on the Recovery of Overpayments, Accounting and Reporting (ROAR) system in Fiscal Year 2003 (population).
- Selected a sample of 250 transactions from the population and obtained the following records for each: the Master Beneficiary Record, including the ROAR record; the Debt Management System record; and the claims folder when available.
- Reviewed the above records and evaluated documentation for compliance with SSA's policies and procedures.

We determined computer-processed data to be sufficiently reliable for their intended use. Further, any data limitations are minor in the context of this assignment, and the use of the data should not lead to an incorrect or unintentional message. The electronic data used in our audit were primarily extracted from the Master Beneficiary Record, the ROAR system and the Debt Management System. We tested for accuracy by comparing data in the ROAR system and the Debt Management System and found no exceptions.

We conducted field work from October 2004 through August 2005 in Baltimore, Maryland. The entity audited was the Office of the Deputy Commissioner for Operations. We conducted this audit in accordance with generally accepted government auditing standards.

Sampling Methodology and Results

We obtained a November 2004¹ electronic data extract from the Social Security Administration's Recovery of Overpayments, Accounting and Recovery (ROAR) system. The extract included all Old Age, Survivors and Disability Insurance (OASDI) records that had a termination of collection efforts transaction code "TC 71" in Fiscal Year (FY) 2003. Records containing duplicate TC 71 codes were eliminated. The extract produced 61,564 records totaling about \$285 million. From this population, we randomly selected 250 overpayment termination records totaling \$1,136,179 for review. For each sample debt termination record, we reviewed the Master Beneficiary Record, ROAR system data, Debt Management System record, and, where available, the claims folder.

Projecting our sample results to the population, we estimate that, for about 11.6 percent of the time, SSA terminated collection efforts for OASDI overpayments not in accordance with its own policies and procedures; or Agency records lacked required documentation to evidence that SSA followed its policies and procedures. In FY 2003, we estimated this occurred about 7,141 times (3,201 + 3,940) for about \$29.6 million (\$6.5+ \$23.1) in OASDI debt.

Attribute Appraisal: Debt Terminated When Contingently Liable Beneficiaries Existed	
Total Population	61,564
Sample Size	250
Number of Debts Terminated When Contingently Liable Beneficiaries Existed	13
Projection of Terminated Debt When Contingently Liable Beneficiaries Existed in Population:	
Lower Limit	1,912
Point Estimate	3,201
Upper Limit	5,008

Note: Projections were calculated at the 90-percent confidence level.

¹ The data extract was obtained from the Social Security records as of November 24, 2004.

Attribute Appraisal: Lack of Documentation Evidencing Contacts Before Terminating Debt

Total Population	61,564
Sample Size	250
Number of Debts Terminated That Lacked Documentation	16
Projection of Debts Terminated That Lacked Documentation in Population:	
Lower Limit	2,499
Point Estimate	3,940
Upper Limit	5,881

Note: Projections were calculated at the 90-percent confidence level.

Variable Appraisal: Debt Terminated When Contingently Liable Beneficiaries Existed

Total Population	61,564
Total Sample Size	250
Total Dollars of Debt Terminated When Contingently Liable Beneficiaries Existed in Sample	\$26,264
Projected Value of Debt Terminated When Contingently Liable Beneficiaries Existed:	
Lower Limit	\$1,527,271
Point Estimate	\$6,467,626
Upper Limit	\$11,407,980

Note: Projections were calculated at the 90-percent confidence level.

Variable Appraisal: Lack of Documentation Evidencing Contacts Before Terminating Debt

Total Population	61,564
Total Sample Size	250
Total Dollars of Debt Terminated That Lacked Documentation in Sample	\$93,662
Projected Value of Terminated Debt That Lacked Documentation:	
Lower Limit	\$8,942,747
Point Estimate	\$23,064,829
Upper Limit	\$37,186,912

Note: Projections were calculated at the 90-percent confidence level.

Appendix D

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: February 27, 2006 Refer To: S1J-3

To: Patrick P. O'Carroll, Jr.
Inspector General

From: Larry W. Dye /s/
Chief of Staff

Subject: Office of the Inspector General (OIG) Draft Report "The Social Security Administration's Decision to Terminate Collection Efforts for Old-Age, Survivors and Disability Insurance Overpayments" (A-13-05-15029) --INFORMATION

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

Let me know if we can be of further assistance. Staff inquiries may be directed to Candace Skurnik, Director, Audit Management and Liaison Staff on extension 54636.

Attachment:
SSA Response

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "THE SOCIAL SECURITY ADMINISTRATION'S DECISION TO TERMINATE COLLECTION EFFORTS FOR OLD-AGE, SURVIVORS AND DISABILITY INSURANCE OVERPAYMENTS" (A-13-05-15029) -- INFORMATION

Thank you for the opportunity to review and comment on the draft report. We agree with the intent of the report and its recommendations. However, we would note that the Program Service Centers (PSC) have issued local procedures in reference to estate development. For example, on February 24, 2005, the Great Lakes Program Service Center issued operational bulletin # 05-13 "Overpayment-Estate processing." This guidance states, "Estate development should be initiated no earlier than 60 days and no later than 2 years after the debtor's death. If more than 2 years has elapsed since the debtor's death, pursue recovery from another person(s) or terminate collection efforts if there is no such person(s)." It is not clear if this provision was taken into consideration during this audit.

In an effort to continue to protect Social Security Administration programs, the Regional Offices and PSCs periodically issue Program Circulars and Operational Bulletins, respectively, to clarify Programs Operations Manual System instructions and procedures. In recent months, both have issued clarifications addressing the processing of Old-Age, Survivors and Disability Insurance (OASDI) overpayments and proper documentation requirements. As examples, on September 13, 2005, the Dallas Regional office issued DAL 05-06 RSI regional circular "Proper Documentation for Title II Waivers" and on December 5, 2005, the Great Lakes Program Service Center issued operational bulletin # 05-121 "Overpayments – Termination of Collection, Compromise, and Suspension Actions and Misuse Abandonment for Debts Over \$20,000."

Several workgroups have also been assembled to develop ways to emphasize proper processing of OASDI overpayments and address proper documentation. Desk guides, such as the "DMS Processing Guide" and the "T2 Waiver Process Handbook" prepared by the Philadelphia Region and last updated in December 2005 and the "Overpayment Guide" compiled by the Denver Region, are available on regional websites and are part of the national resources kits.

As a result of other recent audits, Regional Office program teams have conducted conference calls with their field components regarding what procedure and policy to use when processing overpayments, including contingently liable persons. This information is also available on the national resource kits and regional websites.

To ensure that technicians follow proper procedure and documentation requirements prior to terminating collections, Central Office, Regional Offices and PSCs will continue to issue reminders on the policies and procedures for processing OASDI overpayments with attention focusing on both procedure and the proper documentation required.

Our specific responses to the report's recommendations are provided below.

Recommendation 1

Take action to ensure compliance with existing policies and procedures regarding contingently liable beneficiaries before terminating collection actions, such as periodic issuance of reminders to staff.

Response:

We agree. The Agency will issue a reminder in the form of an Administrative Message and will request that the Office of Training (OT) present it during one of the transmittal training broadcast sessions no later than May 2006.

Recommendation 2

Take action to ensure compliance with existing policies and procedures to document contacts before terminating collection efforts, such as periodic issuance of reminders to staff. These include contacts with the debtor and, where the debtor is deceased, contacts checking for an estate when the overpayment was \$600 or more.

Response:

We agree. The Agency will issue a reminder in the form of an Administrative Message and will request that OT present it during one of the transmittal training broadcast sessions no later than May 2006.

Appendix E

OIG Contacts and Staff Acknowledgments

OIG Contacts

Shirley E. Todd, Director, General Management Audit Division (410) 966-9365

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Acknowledgments

In addition to those named above:

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For additional copies of this report, please visit our web site at
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