

Audit Report

The Social Security Administration's
Processing of Returned Old-Age,
Survivors and Disability Insurance
Payments

OIG

Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: September 12, 2019 **Refer To:**

To: The Commissioner

From: Inspector General

Subject: The Social Security Administration's Processing of Returned Old-Age, Survivors and Disability Insurance Payments (A-07-18-50570)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration processed returned Old-Age, Survivors and Disability Insurance benefits according to policy.

If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, 410-965-9700.



Gail S. Ennis

Attachment

The Social Security Administration's Processing of Returned Old-Age, Survivors and Disability Insurance Payments

A-07-18-50570



September 2019

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) processed returned Old-Age, Survivors and Disability Insurance (OASDI) benefits according to policy.

Background

OASDI benefits are returned for a variety of reasons, including problems with a beneficiary's address, incorrect direct deposit account information, or a change in representative payee. SSA's system automatically processes returned benefit payments in some circumstances. However, SSA's system cannot always automate returned payment actions. Instead, it generates an alert for an SSA employee to take manual corrective action. SSA will not reissue a returned payment if it determines the beneficiary was not due the payment. Additionally, SSA may reissue a returned payment for a different amount if it determines the original payment amount is no longer due.

From 1 segment of the Payment History Update System, we identified 33,111 beneficiaries whose benefit payments of the median amount of \$872 or higher were returned to SSA during Calendar Years 2015 through 2017. From this population, we reviewed 236 beneficiaries.

Findings

SSA did not process returned OASDI benefits according to policy for 34 (14 percent) of the 236 beneficiaries we reviewed, which resulted in \$412,887 in improper payments. For 16 beneficiaries, SSA did not reissue benefits that were due, including payments to 2 beneficiaries who were due over \$90,000 each. For 14 beneficiaries, SSA reissued benefits for an incorrect amount. For four beneficiaries, SSA reissued benefits that were not due.

We project there were 19,700 beneficiaries with returned OASDI benefits in Calendar Years 2015 through 2017 that SSA did not process according to policy, which resulted in approximately \$54.8 million in improper payments. SSA made these improper payments because it made errors when it (1) determined the total amount of benefits due after payments were returned or (2) failed to verify and/or update beneficiary information so it could determine whether to reissue any portion of the returned benefits.

SSA reviewed the records and took appropriate action for 19 of the 34 beneficiaries. However, SSA needs to take corrective action for the 15 remaining beneficiaries.

Recommendations

We recommend SSA:

1. Review and correct the records of the remaining 15 beneficiaries for whom it did not process returned OASDI benefits according to policy.
2. Establish a process to review all returned OASDI payments greater than \$90,000.
3. Improve its controls over processing returned OASDI payments to ensure employees are using a payment worksheet or The Auditor to verify payment amounts due beneficiaries.
4. Issue a reminder to employees on how to determine the appropriate action for returned OASDI payments based on the return reason and other pertinent information.

SSA agreed with our recommendations.

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ABBREVIATIONS

C.F.R.	Code of Federal Regulations
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
Treasury	Department of the Treasury
U.S.C.	United States Code

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) processed returned Old-Age, Survivors and Disability Insurance (OASDI) benefits according to policy.

BACKGROUND

The OASDI program provides benefits to wage earners and their families who meet certain criteria in the event the wage earner retires, becomes disabled, or dies.¹ SSA issues OASDI benefit payments to beneficiaries or their representative payees via the Department of the Treasury (Treasury) through electronic payments direct deposited into a bank account or onto a Direct Express prepaid debit card. There are rare circumstances where payments are issued by paper check.²

Treasury receives returned OASDI benefit payments for a variety of reasons, including problems with a beneficiary's address, incorrect direct deposit account information, or a change in representative payee. Treasury determines why a payment was returned and sends a daily file of returned payment information to SSA. SSA's Returned Check Action program automatically processes returned benefit payments in some circumstances. For example, it automatically reissues a payment returned for address problems if the payment's issue date was before the effective date of an address change.

However, in some situations, SSA's system cannot automate returned payment actions and generates an alert for an SSA employee to take manual corrective action. For example, if a beneficiary is receiving payments and has a payment returned for a change in marital status, an SSA employee would need to determine what action to take based on the return reason and whether to reissue any portion of the payment.

SSA will not reissue a returned payment if it determines the beneficiary was not due the payment. For example, SSA would not reissue a returned payment if a beneficiary notifies it of non-receipt of the payment and SSA had already provided a replacement payment. SSA may reissue a returned payment for a different amount if it determines the original payment amount is no longer due. For example, SSA may withhold part of a payment to recover an overpayment³ or change a beneficiary's monthly benefit amount.

¹ *Social Security Act*, 42 U.S.C. §§ 402, 423 (govinfo.gov 2017).

² A beneficiary may elect to receive a paper check include if he/she (1) does not have a representative payee and has a mental impairment that prevents him/her from handling payments electronically or (2) lives in a remote location that does not have the infrastructure to receive payments electronically. 31 C.F.R. § 208.4 (a) (govinfo.gov 2018).

³ We use "overpayment" here and throughout the report to include legally defined overpayments and improper payments.

From 1 segment of the Payment History Update System,⁴ we identified 33,111 beneficiaries whose benefit payments of the median amount of \$872 or higher were returned to SSA during Calendar Years 2015 through 2017.⁵ From this population, we reviewed 236 beneficiaries to determine whether SSA processed the returned benefits according to policy.⁶

RESULTS OF REVIEW

SSA did not process returned OASDI benefits according to policy for 34 (14 percent) of the 236 beneficiaries we reviewed, which resulted in \$412,887 in improper payments (see Table 1). For 16 beneficiaries, SSA did not reissue benefits that were due, including payments that were greater than \$90,000 each to 2 beneficiaries.⁷ For 14 beneficiaries, SSA reissued benefits for an incorrect amount. For four beneficiaries, SSA reissued benefits that were not due.

Table 1: Summary of Errors

Error Category	Number of Beneficiaries	Total Overpayments	Total Underpayments	Total Improper Payments
Payment Not Reissued	16	\$0	\$355,841	\$355,841
Payment Reissued for Incorrect Amount	14	\$24,761	\$4,977	\$29,738
Payment Reissued Inappropriately	4	\$27,308	\$0	\$27,308
TOTAL	34	\$52,069	\$360,818	\$412,887

We project there were 19,700 beneficiaries with returned OASDI benefits in Calendar Years 2015 through 2017 that SSA did not process according to policy, which resulted in approximately \$54.8 million in improper payments.⁸ These improper payments were made because SSA (1) made errors when it determined the total amount of benefits due after payments were returned or (2) failed to verify and/or update beneficiary information so it could determine whether to reissue any portion of the returned benefits.

⁴ SSA records payments to OASDI beneficiaries in the Payment History Update System, which is divided into 20 representative segments.

⁵ We selected the median amount of \$872 as the minimum to ensure we focused on the returned payments with the highest value.

⁶ See Appendix A for the scope and methodology of our review.

⁷ As part of our sample, we reviewed all seven beneficiaries who had returned payments greater than \$90,000 (see Appendix A).

⁸ See Appendix B for our sampling and methodology results.

Payments Not Reissued

SSA did not reissue \$355,841 to 16 beneficiaries whose OASDI benefits were returned. SSA made errors when it determined the total amount of benefits due 5 beneficiaries after their payments were returned and failed to verify and/or update information so it could determine whether to reissue any portion of 11 beneficiaries' returned benefits.

For example, a disabled child began receiving Supplemental Security Income payments in December 1995.⁹ In November 2017, SSA determined the child was due \$218,532 because she was eligible for OASDI benefits based on her father's earnings beginning with the date of his death in August 2006.¹⁰ Since SSA's system only issues payments of less than \$100,000, SSA split the benefits due into three payments (see Table 2). SSA issued the first payment of \$100,000 in November 2017. The payment was returned to SSA in December 2017. SSA's systems did not specifically identify why the payment was returned. Since SSA's system could not automatically process the returned payment action, it generated an alert for an employee to take manual action on the returned payment. In January 2018, an employee issued the second and third payments of \$100,000 and \$18,532, respectively. However, the employee did not reissue the returned payment because he/she incorrectly determined the amount still due the beneficiary. Therefore, the beneficiary was underpaid \$100,000.¹¹

Table 2: Payment Calculation

Payment	Amount Paid	Status	Amount Due
1	\$100,000	Returned and Not Reissued	\$100,000
2	\$100,000	Paid	\$0
3	\$18,532	Paid	\$0
TOTAL	\$218,532		\$100,000

We reviewed all seven beneficiaries with at least one returned payment that exceeded \$90,000.¹² Of these, two (29 percent) had at least one returned payment each that SSA did not reissue but should have. As a result, SSA underpaid one beneficiary \$100,000 and the other beneficiary \$122,000. Given the high error rate for the seven beneficiaries we reviewed, we recommend SSA establish a process to review all returned OASDI benefit payments greater than \$90,000.

⁹ The Supplemental Security Income program provides payments to financially needy individuals who are aged, blind, or disabled. 20 C.F.R. § 416.110 (govinfo.gov 2018).

¹⁰ A disabled adult may be eligible for child's benefits when a parent dies if the adult is unmarried and age 18 or older and has a disability that started before age 22. SSA, *POMS*, RS 00203.001 (July 9, 2018).

¹¹ In response to our review, SSA reissued the payment to the beneficiary in February 2019.

¹² See Appendix A for the scope and methodology of our review.

During our audit, SSA took appropriate action for 8 of the 16 beneficiaries for whom it had not reissued benefits due. Therefore, SSA needs to take corrective action on the eight remaining beneficiaries' records.

Payments Reissued for Incorrect Amount

SSA made errors when it determined the total amount of benefits due after 14 beneficiaries' payments were returned. This resulted in \$29,738 in improper payments. For example, in February 2016, a beneficiary applied for retirement benefits to start in August 2015. SSA issued the beneficiary a \$9,491 payment, the amount he was due for August 2015 through March 2016. The payment was returned to SSA in April 2016 because of an address problem. SSA corrected the problem and reissued a \$9,481 payment, which included the April 2016 payment due. The beneficiary was actually due \$10,431, but, when SSA reissued the payment, it inappropriately withheld \$950 in Federal taxes from the benefits due, which resulted in an underpayment (see Table 3).

Table 3: Payment Calculation

Time Period	Amount SSA Paid	Amount Due the Beneficiary	Underpayment
August 2015 – March 2016	\$8,541	\$9,491	(\$950)
April 2016	\$940	\$940	\$0
TOTAL	\$9,481	\$10,431	(\$950)

During our audit, SSA took appropriate action for 10 of the 14 beneficiaries for whom it reissued an incorrect payment. Therefore, SSA needs to take corrective action on the four remaining beneficiaries' records.

Payments Reissued Inappropriately

SSA reissued four beneficiaries payments that were not due, which resulted in \$27,308 in overpayments. For two beneficiaries, this occurred because SSA made errors when it determined the total amount of benefits due after the payments were returned. For two other beneficiaries, SSA failed to verify and/or update information so it could determine whether to reissue any portion of beneficiaries' returned benefits.

For example, in March 2017, Treasury returned a beneficiary's \$1,254 OASDI benefit to SSA because of an address problem. SSA reissued the payment, but it was returned again. SSA updated the beneficiary's information and successfully reissued the payment to the beneficiary. However, an SSA employee also issued a replacement payment through the Critical Payment

System.¹³ As a result, the beneficiary was overpaid \$1,254 because SSA made an error when it determined the amount the beneficiary was still due.¹⁴ During our audit, SSA took appropriate action for one of these four beneficiaries. Therefore, SSA needs to take corrective action on the three remaining beneficiaries' records.

Controls over Returned Payment Processing

SSA needs to improve its controls over processing returned benefit payments. As discussed above, SSA did not process 34 beneficiaries' returned OASDI benefits according to policy. Specifically, SSA made errors when it determined the total benefits due after a payment was returned or failed to verify and/or update beneficiary information so it could determine whether to reissue any portion of the returned benefits (see Table 4).

Table 4: Total Errors by Type

Error Type	Number of Beneficiaries	Total Improper Payments
Errors in Determining Benefits Due	21	\$144,238
Failure to Verify/Update Beneficiary Information	13	\$268,649
TOTAL	34	\$412,887

SSA has tools for employees to ensure the accuracy of benefit amounts due. Specifically, employees can use payment worksheets to help verify an over- and/or underpayment by comparing what a beneficiary was paid to what the beneficiary was due. In addition, employees can use The Auditor, which is a comprehensive, automated tool that summarizes all payments due and paid by querying various SSA systems. The Auditor uses this information to compare total benefits paid with total benefits due and displays the result of the computation. During our audit, we found no documentation that SSA employees used payment worksheets or The Auditor for any of the 21 beneficiaries we identified where SSA made errors when determining the total amount of benefits due after payments were returned. Therefore, we recommend SSA improve its controls over processing returned OASDI benefit payments to ensure employees are using a payment worksheet or The Auditor to verify payment amounts due beneficiaries.

Further, we determined SSA did not verify and/or update 13 beneficiaries' information according to policy. When SSA receives returned payment information, it determines what action it should take based on the reason for the return. Based on the reasons payments to these 13 beneficiaries were returned, SSA should have taken action to identify current addresses, bank information, or representative payees, or verify death information so it could determine whether to reissue any

¹³ The Critical Payment System can issue OASDI payments to beneficiaries if they report they did not receive a monthly benefit. SSA, *POMS*, RS 02803.050 (June 7, 2005). Before issuing a Critical Payment System payment, an SSA employee determines whether a payment is warranted by reviewing appropriate queries and systems. SSA, *POMS*, RS 02803.045 (January 15, 2016).

¹⁴ In response to our review, SSA assessed a \$1,254 overpayment for the beneficiary in August 2019.

portion of the returned benefits. However, SSA did not do so. Therefore, we recommend SSA issue a reminder to employees on how to determine the appropriate action for returned OASDI payments based on the return reason and other pertinent information.

CONCLUSIONS

SSA did not process returned OASDI benefits according to policy for 34 (14 percent) of the 236 beneficiaries we reviewed and therefore needs to improve its controls. This occurred because SSA made errors when it determined the total amount of benefits due after payments were returned or failed to verify and/or update beneficiary information so it could determine whether to reissue any portion of the returned benefits. Accordingly, we estimate there were 19,700 beneficiaries with returned OASDI payments that SSA did not process according to policy, which resulted in approximately \$54.8 million in improper payments. Based on our review, SSA took appropriate action for 19 of the 34 beneficiaries. However, SSA needs to take corrective action for the 15 remaining beneficiaries.

RECOMMENDATIONS

We recommend SSA:

1. Review and correct the records of the remaining 15 beneficiaries for whom it did not process returned OASDI benefits according to policy.
2. Establish a process to review all returned OASDI payments greater than \$90,000.
3. Improve its controls over processing returned OASDI payments to ensure employees are using a payment worksheet or The Auditor to verify payment amounts due beneficiaries.
4. Issue a reminder to employees on how to determine the appropriate action for returned OASDI payments based on the return reason and other pertinent information.

AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix C.



Rona Lawson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed applicable sections of the *Social Security Act* and Social Security Administration's (SSA) Program Operations Manual System.
- Reviewed prior Office of the Inspector General reports.
- Identified 33,111 Old-Age, Survivors and Disability Insurance (OASDI) beneficiaries from 1 segment of the Payment History Update System¹ who did not have a date of death on their record and had at least 1 payment of the median amount of \$872 or larger returned to SSA during Calendar Years 2015 through 2017.
- Reviewed 236 beneficiaries from the following sampling frames.²
 - **Sampling Frame 1:** All seven beneficiaries who had at least one returned payment that was larger than \$90,000.
 - **Sampling Frame 2:** All 29 beneficiaries who had at least 11 returned payments.
 - **Sampling Frame 3:** A random sample of 200 beneficiaries from the 8,491 who had between 2 and 10 returned payments.
- Reviewed evidence from the following electronic systems.
 - Payment History Update System
 - Master Beneficiary Record
 - Online Retrieval System
 - Claims File User Interface
 - Paperless Read Only Query System
 - Treasury Check Information System
- Reviewed what the beneficiary was actually paid versus what the beneficiary should have been paid to determine any associated overpayment or underpayment on the record.

¹ SSA records OASDI payments in the Payment History Update System, which is divided into 20 representative segments based on the last 2 digits of the beneficiaries' Social Security number. One segment of the Payment History Update System represents 5 percent of the total population of beneficiaries. Because each segment contains similar characteristics, the results of the audit are representative of the entire population.

² In addition, we reviewed a probe sample of beneficiaries who had only one returned payment. Our review of the sample identified a low error rate and immaterial findings. Therefore, we did not expand our review of those cases and excluded them from this report.

We conducted our review between January and June 2019 in Kansas City, Missouri. We determined the data used for this audit were sufficiently reliable to meet our objective. The principal entity reviewed was the Office of Operations. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B – SAMPLING RESULTS AND PROJECTIONS

We established four sampling frames as detailed in Appendix A and selected samples of 236 Old-Age, Survivors and Disability Insurance (OASDI) beneficiaries for review.

Table B–1: Sample Sizes

Description	Sampling Frame 1 (Returned Payment Greater than \$90,000)	Sampling Frame 2 (At Least 11 Returned Payments)	Sampling Frame 3 (2 to 10 Returned Payments)	Total
Population Size (1 segment)	7	29	8,491	8,527
Sample Size	7	29	200	236
Estimated Total Population (Sampling Frame Size x 20 segments) ¹	140	580	169,820	170,540

Sample Errors and Projections

Of the 236 beneficiaries we reviewed, the Social Security Administration (SSA) did not process returned OASDI payments according to policy for 34, which resulted in \$412,887 in improper payments. These errors occurred because SSA incorrectly determined the total amount of benefits due after a payment was returned, or failed to verify and/or update beneficiary information so it could determine whether to reissue any portion of the returned benefits (see Table B–2).

Table B–2: Total Errors by Type

Sampling Frame	Errors in Determination of Benefits Due		Failure to Verify/Update Information		Total	
	Number	Amount	Number	Amount	Number	Amount
1. Returned Payment Greater than \$90,000	1	\$100,000	1	\$122,000	2	\$222,000
2. At Least 11 Returned Payments	5	\$22,584	4	\$106,869	9	\$129,453
3. Between 2 and 10 Returned Payments	15	\$21,654	8	\$39,780	23	\$61,434
TOTAL	21	\$144,238	13	\$268,649	34	\$412,887

¹ See Appendix A, Footnote 1.

Accordingly, we estimate there were 19,700 beneficiaries with returned OASDI payments in Calendar Years 2015 through 2017 that SSA did not process according to policy, which resulted in \$54,752,920 in improper payments (see Table B–3).

Table B–3: Total Estimated Errors to Entire Payment History Update System File

Sampling Frame	Errors in Sample	Error Amount in Sample	Total Errors in Population	Total Error Amount in Population
1. Returned Payment Greater than \$90,000 (see Table B–4)	2	\$222,000		
2. At Least 11 Returned Payments (see Table B–5)	9	\$129,453	180	\$2,589,060
3. Between 2 and 10 Returned Payments (see Table B–6)	23	\$61,434	19,520	\$52,163,860
TOTAL	34	\$412,887	19,700	\$54,752,920

Sampling Frame 1 Errors

Sampling Frame 1 comprised all seven beneficiaries who had at least one payment greater than \$90,000 returned to SSA. SSA did not process two beneficiaries' returned OASDI payments according to policy, which resulted in \$222,000 in improper payments (see Table B–4).²

Table B–4: Sampling Frame 1 Errors

Description	Number of Beneficiaries	Error Amount
Sample Results (1 segment)	2	\$222,000

These errors occurred because, for one beneficiary, SSA made an error when determining the total amount of benefits due after a payment was returned and, for the other beneficiary, failed to verify and/or update information so it could determine whether to reissue any portion of the returned benefits.

Sampling Frame 2 Errors

Sampling Frame 2 comprised all 29 beneficiaries who had at least 11 payments returned to SSA. SSA did not process returned OASDI payments according to policy for nine beneficiaries, which resulted in \$129,453 in improper payments. Based on those results, we estimate SSA improperly paid 180 beneficiaries \$2,589,060 (see Table B–5).³

² We used straight-line estimates to project totals for this sampling frame. We believe the straight-line estimates are representative of the characteristics of the entire population.

³ See Appendix B, Footnote 2.

Table B–5: Sampling Frame 2 Errors and Estimates

Description	Number of Beneficiaries	Error Amount
Sample Result (1 segment)	9	\$129,453
Population Estimate (Sample Results x 20 Segments)	180	\$2,589,060

These errors occurred because SSA incorrectly determined the total amount of benefits due after payments were returned for five beneficiaries and, for four beneficiaries, failed to verify and/or update information so it could determine whether to reissue any portion of the returned benefits.

Sampling Frame 3 Errors

Sampling Frame 3 comprised a random sample of 200 beneficiaries from the 8,491 who had between 2 and 10 payments returned to SSA. SSA did not process 23 beneficiaries' returned OASDI payments according to policy, which resulted in \$61,434 in improper payments. Accordingly, we estimate SSA did not process returned OASDI payments according to policy for 19,520 beneficiaries, which resulted in \$52,163,860 in improper payments (see Table B–6).

Table B–6: Sampling Frame 3 Errors and Projections

Description	Number of Beneficiaries	Error Amount
Sample Results (1 segment)	23	\$61,434
Projected Quantity (1 segment)	976	\$2,608,193
Projection – Lower Limit	682	\$1,166,090
Projection – Upper Limit	1,345	\$4,050,295
Population Estimate (Projected Quantity x 20 Segments)	19,520	\$52,163,860

Note: All projections are at the 90-percent confidence level.

These errors occurred because, for 15 beneficiaries, SSA made errors when it determined the total amount of benefits due after payments were returned and, for 8 beneficiaries, failed to verify and/or update information so it could determine whether to reissue any portion of the returned benefits.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: September 10, 2019 Refer To: S1J-3

To: Gail S. Ennis
Inspector General

A handwritten signature in blue ink that reads "Stephanie Hall".

From: Stephanie Hall
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "The Social Security Administration's Processing of Returned Old-Age, Survivors and Disability Insurance Payments" (A-07-18-50570) -- INFORMATION

Thank you for the opportunity to review the draft report. We agree with the recommendations. We will continue to improve the accuracy of processing returned Old-Age, Survivors and Disability Insurance payments through the use of automation tools and refresher training. We have already begun training technicians on when and how to use The Auditor tool and payment worksheets to ensure proper processing of returned payments. Development of a new multi-year project to consolidate, modernize, and streamline our debt collection processes is also underway and includes expanded use of The Auditor tool. We provided technical comments at the staff level.

Please let me know if we can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.

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