SOCIAL SECURITY

MEMORANDUM

Date: May 16, 2007 Refer To:

To: The Commissioner

From: Inspector General

Subject: Organizational Review of the Office of Disability and Income Security Programs (A-12-07-27162)

The attached final report presents the results of our review. Our objective was to assess the organizational structure and functions of the Social Security Administration's Office of Disability and Income Security Programs (ODISP) to determine if changes would assist the Agency in its administration of the Old-Age, Survivors and Disability Insurance and Supplemental Security Income programs.

We received comments from both the Acting Deputy Commissioner for ODISP and the Deputy Commissioner for Budget, Finance and Management. Their comments generally agreed with our overall recommendations; however, they offered some alternative approaches to address a few specific issues we raised.

Please provide within 60 days a corrective action plan that addresses 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.

Patrick P. O'Carroll, Jr.

Attachment

OFFICE OF
THE INSPECTOR GENERAL

SOCIAL SECURITY ADMINISTRATION

ORGANIZATIONAL REVIEW
OF THE OFFICE OF DISABILITY AND
INCOME SECURITY PROGRAMS

May 2007 **A-12-07-27162**

EVALUATION REPORT

Mission

By conducting independent and objective audits, evaluations and investigations, we inspire public confidence in the integrity and security of SSA's programs and operations and protect them against fraud, waste and abuse. We provide timely, useful and reliable information and advice to Administration officials, 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

We strive for continual improvement in SSA's programs, operations and management by proactively seeking new ways to prevent and deter fraud, waste and abuse. We commit to integrity and excellence by supporting an environment that provides a valuable public service while encouraging employee development and retention and fostering diversity and innovation.

Executive Summary

OBJECTIVE

Our objective was to assess the organizational structure and functions of the Social Security Administration's (SSA) Office of Disability and Income Security Programs (ODISP) to determine if changes would assist the Agency in its administration of the Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) programs.

BACKGROUND

In March 2007, the Commissioner of Social Security requested that the Office of the Inspector General conduct a review of the organizational structure and functions of ODISP—which is the component within SSA that directs and manages the planning, development and issuance of operational regulations, standards and instructions for the OASDI and SSI programs, as well as SSA's international programs.

RESULTS OF REVIEW

Our review of the structure and functions of ODISP found that this component is not focused solely on planning and program policy issues, but instead is responsible for several operational functions. Specifically, we found that some functions within ODISP may be better aligned to improve coordination and productivity and some other functions appear to be inconsistent with ODISP's mission and may be better managed elsewhere in SSA.

Additionally, throughout our interviews with about 17 percent of ODISP's employees as well as several of ODISP's customers, a consistent theme was poor communication within ODISP and between ODISP and other SSA components.

CONCLUSION AND RECOMMENDATIONS

SSA may be better served from a functional point of view if ODISP's main focus were program policy. Therefore, we recommend the Agency:

- Re-direct ODISP's focus to program policy.
- Align similar/related functions within ODISP.
- Delineate more clearly the role of ODISP with respect to other components.
- Improve communications within ODISP and other components.
- Consider renaming ODISP and SSA's Office of Policy to clarify the roles of each component, or combining ODISP with the Office of Policy.

AGENCY COMMENTS

Overall, SSA agreed with our five main recommendations.

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Introduction

OBJECTIVE

Our objective was to assess the organizational structure and functions of the Social Security Administration's (SSA) Office of Disability and Income Security Programs (ODISP) to determine if changes would assist the Agency in its administration of the Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) programs.

BACKGROUND

In March 2007, the Commissioner of Social Security requested that the Office of the Inspector General conduct a review of the organizational structure and functions of ODISP. ODISP directs and manages the planning, development, and issuance of operational regulations, standards and instructions for the OASDI and SSI programs, as well as SSA's international programs. ODISP's mission is to:

- Develop the Agency's regulations designed to administer all SSA programs.
- Develop program instructions and forms necessary for the Agency's operating personnel to administer all SSA programs, and direct all systems activities supporting the Agency's electronic programmatic instructional system.
- Develop and implement procedures, instructions and forms, and coordinate activities with the Department of State and other Federal agencies, relating to the operation of Social Security programs outside the United States.
- Negotiate, implement and administer bilateral social security agreements between the United States and other countries.
- Design and develop initiatives and programs to promote the employment of beneficiaries with disabilities.
- Develop demonstrations and studies, which provide recommendations on program improvements.
- Assess the programmatic policy development processes to identify and recommend technology improvements and enhancements, and at the Agency level, develop and prioritize technology for the Agency's programmatic policy development process.

Office of Management and Budget (OMB) guidance states that:

- Federal employees must ensure that Federal programs operate efficiently and effectively to achieve desired objectives.
- Programs must operate and resources must be used consistent with agency missions.

- Within the organizational structure, management must clearly define areas of authority and responsibility, appropriately delegate the authority and responsibility throughout the agency, and establish a suitable hierarchy for reporting.[1]

A prior Social Security Advisory Board report recommended that the individual who heads SSA's policy development organization have clear responsibility for coordinating the Agency's policy functions and should not be responsible for program operations.[2]

To accomplish our objective, we interviewed or obtained information from 112 ODISP employees (about 17 percent) as well as a number of employees in other SSA components whose work relates to ODISP's mission. We also reviewed assorted documentation related to ODISP's organizational structure and functions. Our results and recommendations that follow are primarily based on information provided by SSA employees during interviews with Office of the Inspector General staff. (See Appendix B for our scope and methodology, Appendix C for additional background information, including an organizational chart, and Appendix D for a brief history of the organizational structure of ODISP.)

[1] OMB Circular No. A-123, Sections I and II-A.

[2] SSAB, *Developing Social Security Policy: How the Social Security Administration Can Provide Greater Policy Leadership*, March 1997. The Advisory Board is a 7-member bipartisan advisory board to advise the President, the Congress and the Commissioner of SSA on Social Security and SSI policy.

Results of Review

Looking at SSA from a functional point of view, we believe ODISP's main focus should be to plan and establish program policy—i.e., the instructions and operational guidance that implement the Agency's programs. However, our review of this component's organizational structure and functions found that it had a mix of program policy and non-policy responsibilities (such as research and demonstration projects and operational functions). Specifically, we found that:

- some functions in ODISP may be better aligned to improve coordination and productivity;
- some functions appear to be inconsistent with ODISP's mission and may be better assigned to other SSA components;
- clarification of ODISP's role in relation to other components is needed; and
- communication within ODISP and between ODISP and other SSA components should be improved.

ODISP ORGANIZATIONAL STRUCTURE AND FUNCTIONS

As of March 23, 2007, ODISP had 651 employees.

Component	Staff Count
The Office of the Deputy Commissioner[3]	139
Office of Disability Programs (ODP)	110
Office of International Programs (OIP)	25
Office of Income Security Programs (OISP)	137
Office of Medical and Vocational Expertise (OMVE)	93
Office of Program Development and Research (OPDR)	66
Office of Employment Support Programs (OESP)	81
Total	**651**

OFFICE OF THE DEPUTY COMMISSIONER FOR ODISP

The Office of the Deputy Commissioner for ODISP consists of an Immediate Office staff as well as several specialized groups—the Medicare Part D Subsidy Appeals Unit (SAU), the Office of Regulations and the Office of Program Systems and Innovation Management (OPSIM).

[3] This includes 34 employees in the Immediate Office, 7 employees in the Office of Regulations, 16 employees in the Medicare Part D Subsidy Appeals Unit and 82 employees in OPSIM.

Immediate Office Staff

As of March 2007, there were 34 staff assigned to the Immediate Office of the Deputy Commissioner for ODISP. This is basically the same number the office had before the Office of Disability Determinations (ODD) and the Office of Disability Adjudication and Review (ODAR) separated from ODISP in Fiscal Year 2006.[4] Despite these major changes, the organizational structure of ODISP's Immediate Office has not changed to reflect the reduction of its duties and responsibilities.

The Deputy Commissioner's Immediate Office needs to be analyzed to determine the optimal number of staff needed to perform its functions. For example, ODISP continues to have two Assistant Deputy Commissioners when no other Deputy Commissioner in SSA has two Assistant Deputy Commissioners. Also, some Immediate Office staff indicated that, prior to the transfer of ODAR, they had spent a majority of their time on ODAR issues. Therefore, some staff should have transferred to ODAR when it became a separate component.

Medicare Part D SAU

The Medicare Part D SAU was established in March 2005 to implement certain provisions of the *Medicare Prescription Drug Improvement and Modernization Act of 2003* (Public Law 108-173). The SAU processes claimant appeals of Medicare Part D prescription drug subsidies. It is a self-contained unit which does not coordinate with any ODISP office and does not perform any policy-making functions. Because this unit performs operational functions, it may fit better outside ODISP. Several employees told us that, because the Unit performs appeals functions, a logical location for the SAU would be in ODAR, which handles other appeals.

Office of Regulations

The Office of Regulations formats and tracks the progress of all Agency regulations, but is not responsible for writing the content of the regulations. Therefore, from a functional standpoint, it does not have to be in ODISP. Some staff we interviewed suggested that it belongs in SSA's Office of General Counsel (OGC) since OGC's Office of Program Law is responsible for drafting and reviewing SSA's regulations.

We reviewed other Federal Agencies' organizational structures who have a role in disability or health care programs—Department of Labor, Department of Veterans Affairs and the Centers for Medicare and Medicaid Services—to see where these Agencies placed their offices responsible for regulations. Two of the three Agencies had their groups responsible for regulations as separate offices reporting to the Agency head. The third Agency had the regulations function within its policy office.

[4] ODD moved to SSA's Office of Operations in October 2005 and ODAR (formerly the Office of Hearings and Appeals) became a separate component in April 2006. There were over 7,500 hearing and appeals employees when these functions (and staff) were separated from ODISP.

Regardless of where it is placed, the Office of Regulations needs to have good communication and cooperation with ODISP offices and other SSA components to do its job well. To the contrary, staff reported that they were directed to process Disability Service Improvement (DSI) regulations in "secret" and they were required to sign "non-disclosure" statements.

OPSIM

OPSIM develops and maintains systems for ODISP, provides security awareness training and user support for ODISP staff and oversees information technology contracts. Similar to SSA's Office of Systems, OPSIM also performs functions which support operations Agency-wide, such as PolicyNet and Program Policy Online. However, OPSIM systems development is not part of SSA's Information Technology Assessment Board process.

SSA should review and clarify the role and mission of OPSIM and assess whether some or all of the Agency-wide systems work currently performed by ODISP systems staff should be moved to the Office of Systems.[5]

If any systems development functions are kept in ODISP, then ODISP needs to institute procedures to ensure all systems are developed and all certification and accreditation (C&A) assessments are performed in accordance with Agency policy. For example, in the past, ODISP did not always follow SSA's policies and procedures related to systems development. Specifically, ODISP created its own C&A self-assessment process instead of following the process established by SSA's Office of the Chief Information Officer (OCIO).[6] As a result, ODISP's C&A program was not answering all the questions needed to meet the National Institute of Standards and Technology requirements to comply with the *Federal Information Security Management Act*.

OFFICE OF DISABILITY PROGRAMS

ODP is responsible for disability program policy, including:

- the electronic disability process;
- disability management information; and
- the Requests for Program Consultation (RPC) pilot program currently operating in SSA's Boston and Denver Regions.[7]

[5] Some ODISP computer specialists are also assigned to ODP and OPDR.

[6] The OCIO serves as the designated authorizing authority for the Agency in the systems C&A process. Specifically, the OCIO authorizes the operation of an information system and explicitly accepts the risk to Agency operations, Agency assets or individuals based on the implementation of an agreed-upon set of security controls for the system.

[7] RPC evaluates and resolves program related disagreements between DDSs and SSA's Office of Quality Performance.

Based on our review, we believe ODP should focus solely on disability program policy issues, such as developing disability evaluation policies and medical evidence requirements. The operational functions ODP performs, such as collecting disability management information and monitoring the quality of SSA disability case development for Cooperative Disability Investigations (CDI), could be moved to SSA's Office of Operations. The Office of Operations already has responsibility for the State Disability Determination Services (DDS) which are a key player in the CDI units; and the disability management information collected by ODP is used by Operations in its oversight of the DDSs.

SSA should review the functions of ODP's Electronic Processing Policy staff and ensure this group is only responsible for policy issues, not maintaining electronic systems or performing operational duties. Also, during our interviews, staff expressed concerns with the role of ODP's medical officers. SSA should review the duties of ODP's medical officers to ensure they are an appropriate fit for this component.

In addition, several individuals we interviewed commented that the RPC pilot program works well but were concerned whether ODP has adequate staffing for the program if it is to be implemented in SSA's other eight regions. ODP should assess whether it has sufficient staff for its RPC initiative if it is rolled out nationwide.

OFFICE OF INTERNATIONAL PROGRAMS

OIP serves as the Agency's focal point for international affairs. Its major activities include:

- negotiating and administering international Social Security agreements;
- developing program policy for application of the United States Social Security program abroad; and
- coordinating and supporting SSA's participation in international organizations.

Our review did not disclose any reasons to modify OIP's structure or functions.

OFFICE OF INCOME SECURITY PROGRAMS

OISP performs a variety of functions related to the Old-Age and Survivors Insurance (OASI) and SSI programs, including:

- developing, coordinating, evaluating and issuing policies, standards and instructions for the OASI and SSI programs;
- developing agreements with the States and other agencies that govern State supplementation programs, Medicaid eligibility, data exchange programs, food stamps and fiscal reporting processes; and
- implementing provisions of the Computer Matching and Privacy Protection Act.

Our review disclosed that, from a functional point of view, it may be more appropriate to re-align some of OISP's functions. Specifically, it may be a better fit to move the limited English speaking, Asian-Pacific and other similar outreach activities to SSA's Office of Communications (OCOMM) since these efforts relate to communications and not developing policy.

Additionally, OISP's responsibilities with regard to information exchange and matching may be better suited elsewhere. One employee informed us that all data exchanges have to be reviewed by SSA's Office of General Counsel/Office of Public Disclosure for privacy issues. Further, OGC's functional description states that its "[Office of Public Disclosure] develops national standards relating to the release and exchange of personal data in SSA databases to Federal, state and local agencies, and serves as the Agency's focal point for all data sharing activities with outside organizations."[8] Given that OGC already performs a key role in data exchanges, it may be a better fit to move this function to OGC. Another option would be to place this function in SSA's Office of Systems or the OCIO. We reviewed information on the three Agencies discussed earlier[9] to determine where those Agencies organizationally placed responsibility for data matching. Two of these Agencies placed this function in their components related to information technology—one in systems and one in the OCIO—and the third placed it in their office responsible for administration and management.

OFFICE OF MEDICAL AND VOCATIONAL EXPERTISE

OMVE performs a number of functions, including:

- managing medical and vocational expert contracts;
- assisting DDSs, Regional Offices, Administrative Law Judges, the Decision Review Board and the Office of Quality Performance with workloads and guidance;
- processing payments for experts, consultative examinations and medical evidence; and
- reviewing, assessing and analyzing policy and procedures for the disability determination process.

OMVE originally was established in ODISP as the Federal DDS. It was transferred to SSA's Office of Operations at the same time other DDS operations were reassigned in 2005. It was moved back to ODISP in May 2006 to support the DSI initiative. Under DSI, OMVE was envisioned to manage a nationwide network of medical, psychological and vocational experts who assist Federal Reviewing Officials, Administrative Law Judges, the Decision Review Board, State DDSs and the Office of Quality Performance in making disability determinations and decisions. The DSI initiative—if maintained by SSA—will require significant hiring to support OMVE's mission.

[8] Prior to the Office of Public Disclosure's move to OGC, this office was part of OISP.

[9] The Departments of Labor and Veterans Affairs, and the Centers for Medicare and Medicaid Services.

While OMVE has some policy functions, such as developing new policies and procedures for the disability determination process, it is still primarily performing an operational function. We believe it should be returned to SSA's Office of Operations, regardless of future Agency decisions on the DSI initiative.

OFFICE OF PROGRAM DEVELOPMENT AND RESEARCH

OPDR was created in 2002 to provide broad program analysis and development in support of the disability and SSI programs. OPDR is responsible for:

- developing and implementing disability and SSI-related demonstration projects;
- administering grants, interagency agreements and contracts (such as the training contract for work incentives and contracts related to the DSI initiative);[10]
- identifying and developing potential research projects to support future policy initiatives and determining policy implications;
- conducting studies and analyses on work incentives;
- developing guidelines and technical procedures for the continuing disability review (CDR) process;
- estimating the number of CDRs that must be processed, establishing the CDR schedule, "scoring" each individual, selecting individuals for a CDR medical review or mailer and monitoring this process; and
- implementing current policy and formulating new and innovative ideas to assist individuals with disabilities to return or remain in the work force.

To re-focus ODISP's mission on program policy, OPDR's functions should be transferred to other SSA components. Specifically:

- Research and demonstration projects could return to SSA's Office of Policy, where they were prior to OPDR's creation in 2002. Combining all research projects in the Office of Policy is consistent with the long-term, forward-thinking mission of that component. Moreover, the Office of Policy is already responsible for other research projects.
- CDR profiling and development of management information could move to SSA's Office of Operations, which is where it was previously, as part of ODD. Since the CDR work is operational in nature, it would be better placed where the CDR work is being performed. Moreover, our interviews with ODISP employees indicated that the separation of the CDR work between these two components has impacted the efficiency of this workload.
- OPDR's work incentive and ticket to work functions would be better placed in the component primarily responsible for these programs—ODISP's Office of Employment Support Programs.

[10] SSA is currently working with OMB to assess DSI and make decisions on the future of this initiative.

OFFICE OF EMPLOYMENT SUPPORT PROGRAMS

OESP was created in 1999 to assist individuals with disabilities who want to become more self-sufficient through work. OESP:

- implements and maintains program policy on Disability Insurance and SSI work incentives and related areas;[11]
- develops informational materials to increase public understanding and use of work incentives and to support the employment efforts of Social Security beneficiaries with disabilities;
- implements the provisions of the Social Security Act which facilitate access to rehabilitation and other forms of employment support services through the Ticket to Work and Self-Sufficiency Program (Ticket);
- supports the Ticket to Work and Work Incentives Advisory Panel;[12] and
- approves payments to service providers and ensures that beneficiary participation in the program is appropriate.

OESP performs both policy and operational functions. For instance, OESP drafts policy and creates materials related to the Ticket program as well as SSA's other work incentive programs. However, OESP also implements programs and works directly with States, contractors and even the public. For example, OESP has overseen the issuance of 12 million Tickets since February 2002 and certified millions of dollars in payments to thousands of Employment Networks. OESP also entered into more than 99 cooperative agreements with community organizations under the Work Incentives Planning and Assistance program.

OESP's policy work fits with ODISP's mission. However, awarding contracts and grants, entering into cooperative agreements, overseeing the issuance of Tickets, approving payments and handling contact with the public are operational functions and may be better aligned with SSA's operational components. Nonetheless, the decision of whether to move the operational functions related to the Ticket program should be delayed until pending (as of April 2007) Ticket program regulations are finalized and the future impact of these new regulations on the Ticket program can be better assessed.

[11] SSA has several work incentive programs, including Plans for Achieving Self-Support, Impairment Related Work Expenses, Ticket to Work, etc.

[12] This 12-member panel consists of 4 individuals appointed by the President, 4 appointed by the House of Representatives and 4 appointed by the Senate. The panel provides advice, recommendations and support to the President, Congress and the Commissioner of Social Security on issues related to people with disabilities who are going back to work.

ODISP COMMUNICATIONS

Throughout our interviews, a consistent theme pertained to poor communication within ODISP and between ODISP and other SSA components. Regardless of the Agency's organizational structure, SSA staff must share the information needed to perform their duties openly and freely. Therefore, we recommend Agency management take steps to ensure open communication within ODISP and between ODISP and other SSA components in the future. During the past month, we have already seen evidence of improvements in this area through the meetings the Acting Deputy Commissioner has been holding with the Assistant Deputy and Associate Commissioners in ODISP.

Further, SSA should establish a formal process to track and resolve policy issues timely, especially those related to disability. Our interviews with other SSA component members identified examples where other components brought issues to ODISP for policy resolution. However, the components reported they frequently did not get timely action on these issues from ODISP. We found no centralized process within ODISP to track the pending issues or their progress toward resolution.

Since policy initiatives affect various components within SSA, a more formal structured process to track all policy initiatives and projects—including established time frames and expected outcomes—would facilitate their efficient development and implementation across the Agency. Through our interviews, we found that individuals within ODISP were not aware of what other ODISP offices were doing—even when the initiatives and/or projects had an impact on their work and needed to be coordinated.

Additionally, more clarification is needed on ODISP's role related to establishing policy versus issuing policy guidance. There are two main operational components in SSA, the Office of Operations and ODAR. ODISP's method of issuing policy to each of these components is different. For example, ODISP writes the content for the Agency's Program Operations Manual System which is mainly used by SSA's Office of Operations. The Office of Operations has the ability to issue instructions to its staff through such documents as operational guides. However, ODISP's role with ODAR is unclear. ODAR develops and issues both policy and instructions on hearings and appeals issues. Currently, ODISP does not serve the same role in issuing policy to ODAR as it does to the Office of Operations. ODAR staff expressed their preference to continue to be responsible for hearings and appeals policy, while ODISP staff believes their office should be responsible for ODAR program policy. We believe SSA needs to clearly define ODISP's role in issuing policy for ODAR.

In some cases, policy issues can be difficult to separate from operational procedures. Therefore, there must be cooperation and coordination between ODISP, Operations, ODAR and other impacted SSA components in an open and responsive environment. Many of the people we interviewed cited examples where conflicts have arisen because ODISP issued policy that later had to be changed because it did not take into account an operational perspective (e.g., policy related to the Intelligence Reform and Terrorism Protection Act, policy related to printing electronic folders in ODAR, etc.). Regardless

of who writes the policy instruction, there needs to be an institutionalized process where all parties are consulted and their views considered prior to issuing instructions that impact SSA's ability to do its job.

SSA, as an Agency, should be consistent in establishing which component is responsible for issuing policy and how operational components should issue instructions to their staffs. Also, the policy guidance and operational instructions need to be consistent and linked to each other.

ODISP AND SSA'S OFFICE OF POLICY

In reviewing ODISP and comparing it to other SSA components with similar functions, we believe any efforts to reorganize ODISP should include an evaluation of ODISP and the Office of Policy to determine whether it makes sense to rename one or both components to clarify the roles of each office and to allow customers to easily identify their missions. For example,

- ODISP could be named the Office of Program Policy, and/or
- the Office of Policy could become the Office of Strategic Planning and Research. The mission of the Office of Policy is to provide advice on major policy issues and it is responsible for major activities in the areas of strategic policy planning, policy research and evaluation.

Additionally, we received a number of suggestions to combine ODISP and the Office of Policy into one component since both components' missions relate to policy and planning.

Conclusion and Recommendations

Based on our interviews with ODISP employees and customers, as well as a review of various documents on SSA's organizational structure and functions, the Agency may be better served if ODISP were to focus mainly on program policy functions and improve its communications. Based on our review, we recommend SSA:

1) Re-direct ODISP's focus to program policy.
   a) Consider transfer of the Medicare SAU and the Office of Regulations currently in the Immediate Office of the Deputy Commissioner.
   b) Move ODP operational functions, such as collection of disability management information, to SSA's Office of Operations.
   c) Clarify the role of ODP's Electronic Processing Policy staff to ensure it focuses on policy, not operational or systems maintenance functions.
   d) Re-visit functions of the medical officers assigned to ODP.
   e) Re-assess the placement of some OISP functions, such as outreach activities and data matching.
   f) Move OMVE to the Office of Operations' ODD.
   g) Transfer OPDR's operational and research functions to other SSA components.
2) Align similar/related functions within ODISP.
   a) Establish a single Assistant Deputy Commissioner position.
   b) Review duties of Immediate Office staff and establish optimal staffing level.
   c) Move OPDR work incentive/ticket to work functions to OESP.
3) Delineate more clearly the role of ODISP with respect to other SSA components.
   a) Clarify the respective policy-making and instruction issuance roles of ODISP and ODAR.
   b) Review and clarify the role/mission of OPSIM.
   c) Ensure ODP has adequate staffing if the RPC pilot is implemented nationwide.
4) Improve communications within ODISP and between ODISP and other components.
   a) Establish a formal process to track and resolve policy issues timely.
5) Consider renaming ODISP and SSA's Office of Policy to clarify the roles of each component, or combining ODISP with the Office of Policy.

AGENCY COMMENTS

Overall, SSA agreed with our five main recommendations. (See Appendices E and F for the full text of the Agency's comments.)

Appendices

Acronyms

C&A	Certification and Accreditation
CDI	Cooperative Disability Investigations
CDR	Continuing Disability Review
DDS	Disability Determination Services
DSI	Disability Service Improvement
OASDI	Old-Age, Survivors and Disability Insurance
OASI	Old-Age and Survivors Insurance
OCIO	Office of the Chief Information Officer
ODAR	Office of Disability Adjudication and Review
ODD	Office of Disability Determinations
ODISP	Office of Disability and Income Security Programs
ODP	Office of Disability Programs
OESP	Office of Employment Support Programs
OGC	Office of General Counsel
OIP	Office of International Programs
OISP	Office of Income Security Programs
OMB	Office of Management and Budget
OMVE	Office of Medical and Vocational Expertise
OPDR	Office of Program Development and Research
OPSIM	Office of Program Systems and Innovation Management
RPC	Request for Program Consultation
SAU	Subsidy Appeals Unit
SSA	Social Security Administration
SSI	Supplemental Security Income
Ticket	Ticket to Work and Self-Sufficiency Program

Scope and Methodology

To accomplish our objective, we:

- Reviewed applicable sections of the Federal Register.
- Researched the history of the organizational structure and functions of the Office of Disability and Income Security Programs (ODISP). This included obtaining and verifying information with the Social Security Administration's (SSA) Office of the Historian and the Office of the Deputy Commissioner for Human Resources.
- Reviewed Government Accountability Office and Social Security Advisory Board reports, as well as internal SSA memorandums and documents related to ODISP.
- Reviewed Office of Management and Budget guidance on organizational structures.
- Interviewed Deputy Commissioners for SSA's major components whose work related to ODISP's mission.
- Obtained a file of all 651 ODISP employees as of March 23, 2007 from SSA's Human Resources Division.
- Interviewed specific ODISP employees, including the Acting Deputy Commissioner, Assistant Deputy and Associate Commissioners, Division Directors, a random sample of staff and volunteers.[1]
    - For the sample of staff, we randomly selected two Social Insurance Specialists and two non-Social Insurance Specialists for each office and/or division within ODISP.
    - For the volunteers, we invited all ODISP employees not selected for interview based on their position or randomly sampled to either volunteer to be interviewed or to provide written responses to questions related to their work duties and responsibilities.

We conducted our review between March and April 2007 in Baltimore, Maryland. The entity reviewed was ODISP. We conducted our review in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

[1] In total, 112 ODISP employees provided us with information for our review (about 17 percent of staff). This included 6 employees who provided written comments to us and 106 employees who we interviewed (32 employees were selected at random and 35 employees volunteered to speak with us). We also interviewed 4 former ODISP employees and 9 executives from other components.

Background

The Old-Age, Survivors and Disability Insurance program provides retirement benefits to insured individuals who have reached the minimum retirement age, survivors' benefits to dependents of insured wage earners in the event the family wage earner dies and disability benefits to disabled wage earners and their families. The Supplemental Security Income (SSI) program provides income to financially needy individuals who are aged, blind and/or disabled.

Within the Social Security Administration (SSA), there are nine Deputy Commissioners with offices reporting to the Commissioner of Social Security:[1]

(1) Communications;
(2) Disability Adjudication and Review;
(3) Budget, Finance and Management;
(4) Human Resources;
(5) Legislation and Congressional Affairs;
(6) Operations;
(7) Policy;
(8) Systems; and
(9) Disability and Income Security Programs.

The Deputy Commissioner for the Office of Disability and Income Security Programs (ODISP) is the principal advisor to the Commissioner on program policy issues and is involved in strategic planning, policy development and analysis of SSA program policy.

- The Immediate Office of the Deputy Commissioner provides the Deputy Commissioner with staff assistance on the full range of his/her responsibilities. The Immediate Office includes the Agency's Regulations Officer and establishes and maintains Agency standards for the development of regulations and rulings.
- The Office of Program Systems and Innovation Management provides expert advice and support to the Deputy Commissioner and Assistant Deputy Commissioner on the technology that supports Agency-level projects and initiatives that impact the Agency's policy-making processes. It provides user support to all ODISP components and directs all systems activities supporting the Agency's electronic programmatic instructional system.
- The Office of Disability Programs plans, develops, evaluates and issues the operational and administrative appeals process policies, standards and instructions for the SSA-administered disability programs. This office also develops and promulgates policies and guidelines for use by State, Federal or private contractor-providers which implement the disability provisions of the Social Security Act.

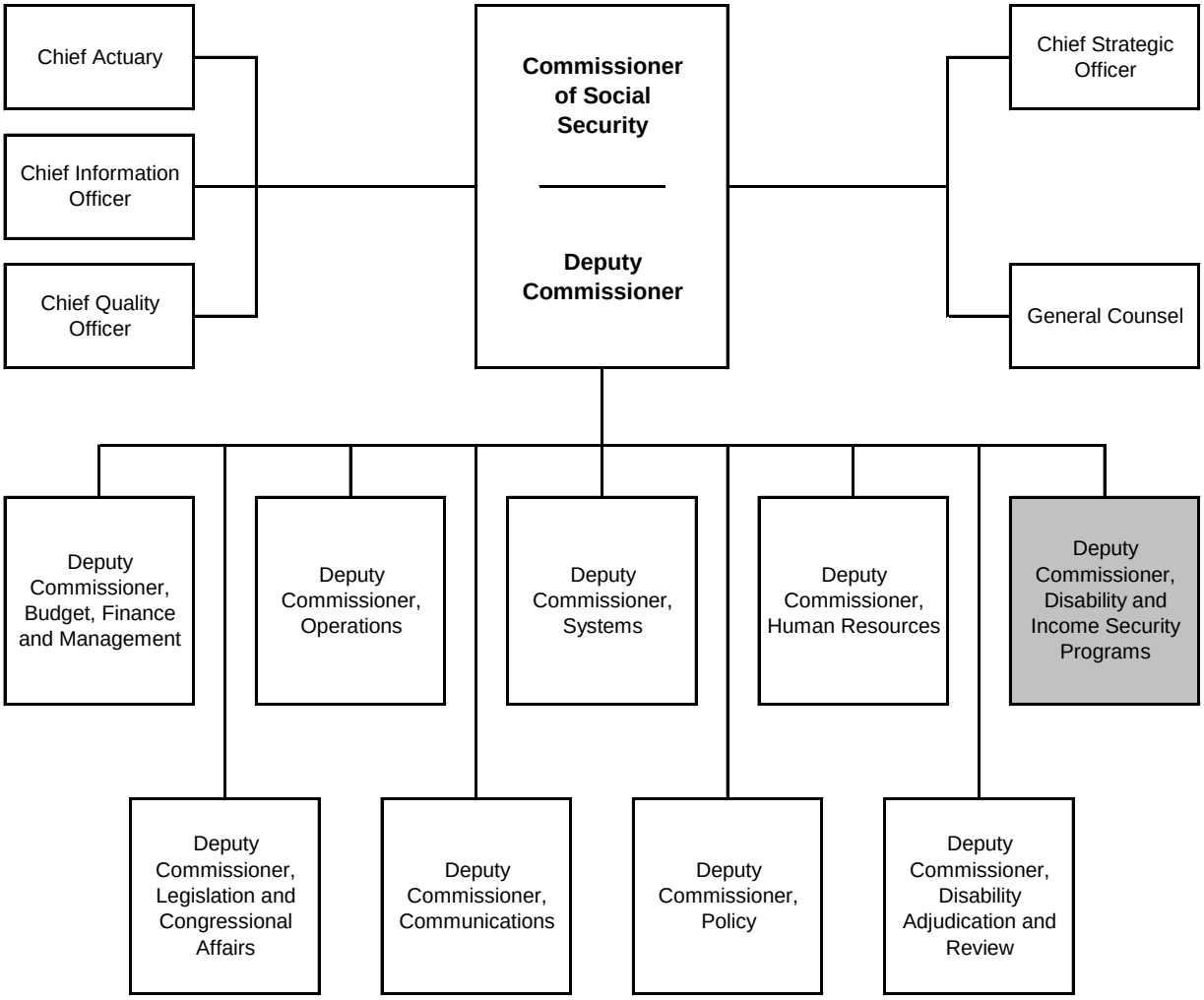
[1] SSA, *Organizational Structure of the Social Security Administration*, April 2007 (http://www.ssa.gov/org/).

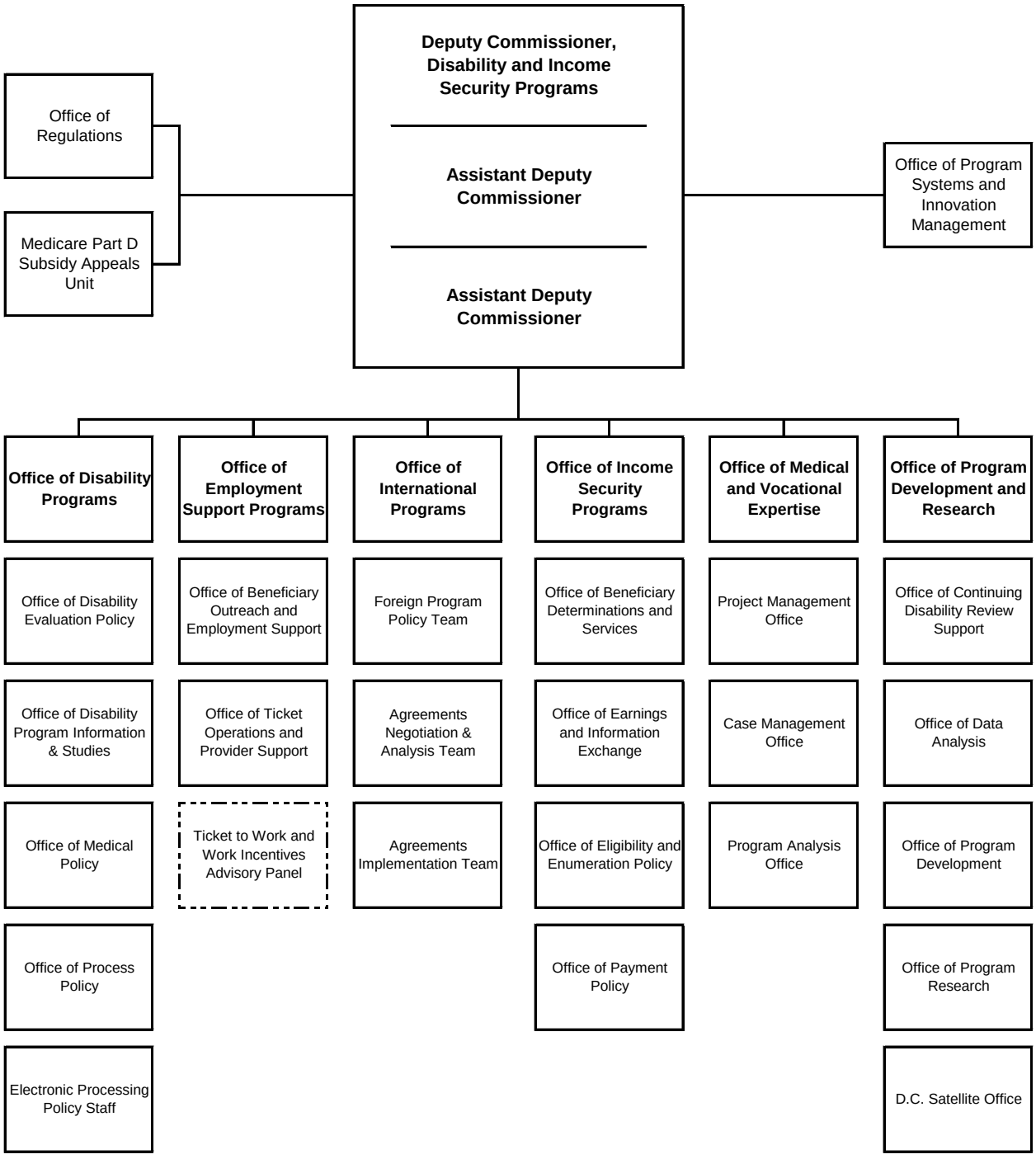
Additionally, this office evaluates the effects of proposed legislation to determine the impact on the disability programs and ensures that interrelated policy areas are coordinated.

- The Office of International Programs serves as SSA's focal point for international program policy matters and the Agency's participation in the international Social Security community. This office also serves as liaison to international agencies and associations that deal with Social Security matters; negotiates international Social Security (totalization) agreements with foreign governments and develops policies and procedures to implement the agreements; develops and implements policies and procedures relating to the operation of the Social Security program outside the United States; and provides training programs and technical consultation to Social Security officials and other experts outside the United States.
- The Office of Income Security Programs provides SSA-wide leadership and direction to the development, coordination and promulgation of Old-Age and Survivors Insurance (OASI) and SSI policies and procedures. This office also develops, coordinates, evaluates and issues the policies, standards and instructions for the OASI and SSI programs; and develops agreements with the States and other agencies that govern State supplementation programs, Medicaid eligibility, data exchange programs, food stamps, fiscal reporting processes and electronic computer matches. Additionally, this office is responsible for all aspects of SSA's policy process and the migration of OASI and SSI program services to the Internet.
- The Office of Medical and Vocational Expertise provides expert advice and supports SSA's disability determinations process. It manages a nationwide network of medical, psychological and vocational experts who assist Federal Reviewing Officials, Administrative Law Judges, the Decision Review Board, State Disability Determination Services and the Office of Quality Performance in making disability determinations and decisions. This office also assists in ensuring full development of the record, enabling adjudicators to make accurate determinations or decisions as early as possible, and facilitates subsequent reviews when a case is appealed to a higher level.
- The Office of Program Development and Research provides broad program analysis and development in support of the Disability Insurance and SSI programs. The office maintains awareness of issues concerning the broad program policy environment, including Congress, the private sector and other government agencies, and ensures the Agency's policy and research agendas consider and reflect these points of view. It also directs studies of program policy issues related to the development and evaluation of disability and SSI program initiatives and legislative and policy proposals; identifies trends in the SSI and the disability programs and compiles and analyzes data on various aspects of those programs; designs, implements and evaluates demonstration projects to target special populations and program issues; and formulates Agency policy regarding cross-cutting programs or issues related to disability and/or income assistance programs and works with other agencies, including the Department of Health and Human Services.

- The Office of Employment Support Programs plans, develops, evaluates, issues and administers operational policies that implement provisions in the Social Security Act and related statutes promoting or otherwise facilitating the employment of Disability Insurance and SSI program beneficiaries with disabilities. This office plans and directs a program to assess and evaluate beneficiary needs in the areas of rehabilitation and employment support. It also provides operational advice, technical support and direction in the administration of employment support programs. Additionally, this office implements legislation related to employment support programs and provides assistance in educating the public about disability program work incentives, rehabilitation and other forms of employment support. It also establishes and maintains relationships with parties interested in the employment of persons with disabilities and engages in broad-based efforts in partnership with other public and private entities to remove employment obstacles encountered by disability beneficiaries. Also, the office promotes process innovation and cooperation among its partners and stakeholders.

The organizational chart for SSA and the more detailed chart for ODISP follow.




Deputy Commissioner, Disability and Income Security Programs
Assistant Deputy Commissioner
Assistant Deputy Commissioner
Office of Regulations
Medicare Part D Subsidy Appeals Unit
Office of Program Systems and Innovation Management
Office of Disability Programs
Office of Disability Evaluation Policy
Office of Disability Program Information & Studies
Office of Medical Policy
Office of Process Policy
Electronic Processing Policy Staff
Office of Employment Support Programs
Office of Beneficiary Outreach and Employment Support
Office of Ticket Operations and Provider Support
Ticket to Work and Work Incentives Advisory Panel
Office of International Programs
Foreign Program Policy Team
Agreements Negotiation & Analysis Team
Agreements Implementation Team
Office of Income Security Programs
Office of Beneficiary Determinations and Services
Office of Earnings and Information Exchange
Office of Eligibility and Enumeration Policy
Office of Payment Policy
Office of Medical and Vocational Expertise
Project Management Office
Case Management Office
Program Analysis Office
Office of Program Development and Research
Office of Continuing Disability Review Support
Office of Data Analysis
Office of Program Development
Office of Program Research
D.C. Satellite Office

ODISP Organizational History

Since 1975, a significant number of changes have occurred to the organizational structure of the Social Security Administration (SSA). Based on our review of Federal Register notices filed by SSA and Commissioner of Social Security announcements, substantial reorganizations or realignments occurred in 1975, 1979, 1983, 1984, 1987, 1988, 1994, 1995, 1996, 1998 and 2002.

In August 1998, SSA changed a component's name from the *Office of Programs and Policy* to the *Office of Disability and Income Security Programs* (ODISP). Also, at that same time, the *Office of Policy and Planning* was abolished and its functions split between the Office of Policy and ODISP.

The chart below shows the organizational structure of ODISP in 1998.

After 1998, numerous changes occurred within ODISP:

Office of Disability

- Eliminated in November 2002
- Functions redistributed to other remaining offices

Office of Hearings and Appeals

- Eliminated in April 2006
- New Office of Disability Adjudication and Review established as a separate component

Office of International Programs

- No changes since 1998

Office of Program Benefits

- Renamed Office of Income Security Programs

Office of Employment Support Programs	• Established in April 1999
Office of Program Support	• Eliminated in November 2002 • Functions redistributed to other remaining offices
Office of Disability Determinations	• Established in November 2002, but then moved to Operations in October 2005 • Created with the deletion of the Offices of Disability and Program Support • Some functions moved to Office of Program Development and Research
Office of Regulations	• Established in 2002
Office of Disability Programs	• Established in November 2002 • Created when the Office of Program Support and the Office of Disability were eliminated
Office of Income Security Programs	• Established in November 2002 • Formerly the Office of Program Benefits • Created when the Office of Program Support and the Office of Disability were eliminated
Office of Program Development and Research	• Established in November 2002 • Created when the Office of Program Support and the Office of Disability were eliminated • Assumed research, demonstration, and evaluation work from the Office of Policy
Program Systems and Innovation Management	• Established in February 2004 • Initially named Information Technology and Support staff
Medicare Part D Subsidy Appeals Unit	• Established in 2005 following the passage of Public Law 108-173
Office of Medical and Vocational Expertise	• Established in May 2006 • Functions taken from Operations/Federal Disability Determination Services • Approximately 75 staff, as well as medical consultants, transferred from Operations to ODISP

ODISP Comments

SOCIAL SECURITY

MEMORANDUM

Date: May 10, 2007 Refer To: TA

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

From: Manuel J. Vaz /s/
Acting Deputy Commissioner for the Office
of Disability and Income Security Programs (ODISP)

Subject: Organizational Review of the Office of Disability and Income Security Programs (A-12-07-27162)--INFORMATION

The attached ODISP report presents our comments and recommendations in response to the OIG organizational review. We greatly appreciate the analysis performed by OIG and as this response reflects, we agree with many of OIG's recommendations.

I look forward to meeting with the Commissioner's workgroup to discuss these recommendations which I believe will strengthen ODISP's ability to be a strong program policy component.

Attachments:

ODISP Response to OIG Report
Organizational Charts

cc:
David Foster, Chief of Staff
David Rust, Executive Secretary
Reginald Wells, Deputy Commissioner for Human Resources
James Kissko, Deputy Inspector General

Executive Summary

OBJECTIVE

Similar to OIG's stated objective, our objective in reviewing and responding to the OIG report was to determine what changes to The Office of Disability and Income Security Programs (ODISP) would best assist the agency in administering the OASDI, SSI and Medicare programs.

ODISP's RESPONSE

We agree with many of the specific proposals for change and where we disagree, we offer an alternative or provide rationale for not changing a particular structure or function. Throughout, we have been guided by the broad principles outlined in OIG's report. Overall, we agree with the five broad conclusions in the report:

- Redirect ODISP's focus to program policy
- Align similar/related functions within ODISP
- Delineate more clearly the role of ODISP with respect to other components
- Improve communications within ODISP and other components
- Consider re-naming ODISP and the Office of Policy to clarify the roles of each component, or combine ODISP with the Office of Policy.

Based on our review, we propose the following (recommendations which are consistent with OIG recommendations are designated with an asterisk):

ODISP Front Office

1. ODISP should have a single Deputy Assistant Commissioner.*
2. ODISP front office staff and related functions should remain in place but be placed under the authority of the Executive Officer position.
3. The Subsidy Appeals Unit should be moved to the Office of Disability Adjudication and Review (ODAR).*
4. The Office of Regulations (OR) could be moved to the Office of General Counsel (OGC)* or as an alternative - to the Office of the Deputy Commissioner for SSA.
5. The Office of Program System and Innovation Management (OPSIM) should remain a part of ODISP and be classified as an Associate Commissioner level office.

Office of Medical and Vocational Expertise (OMVE)

6. A large portion of the Office of Medical and Vocational Expertise (OMVE) should be moved to DCO to help support the DDS's* while the remaining portion should remain in ODISP and be combined with the other program analysis functions into a new component called the Office of Program Studies and Analysis (OPSA).

7. The national registry should be developed and maintained by either the Deputy Commissioner for Operations (DCO) or ODAR.

Office of Program Development (ODP)

8. ODP should absorb the Continuing Disability Review (CDR) program policy from the Office of Program Development and Research (OPDR).
9. The Professional Relations Staff should be moved to DCO/ODD.
10. The Office of Disability Program Information Studies should be moved to OPSA, the proposed new ODISP component .

Office Program Development and Research (OPDR)

11. The demonstration projects from OPDR should be moved to OPSA, the proposed new ODISP component.
12. The CDR profiling function should be moved out of ODISP* and be transferred to the Office of Quality Performance.
13. OPDR's work incentives functions should be moved to the OESP*.

Office of International Programs (OIP)

14. OIP should not be modified. *

Office of Income Security Programs (OISP)

15. The limited English speaking, Asian-Pacific and other similar outreach activities should be moved to the Office of Communications.*
16. The information exchange and matching function should be moved to the Office of General Counsel/Office of Public Disclosure.*

Office of Employment Support Programs (OESP)

17. The work incentives program policy function currently performed in OPDR should be moved to OESP.*
18. The workload function of paying service providers and the Vocational Rehabilitation Agencies should be moved to the Office of Operations.
19. The work incentive contracts and grants function should remain in OESP

General Recommendations

20. ODISP will improve communications within ODISP and between ODISP and other components.*
21. ODISP should work with the other deputy level components to develop a centralized process within ODISP to track the pending issues and their progress toward resolution.*
22. ODISP should meet with ODAR and DCO to discuss respective policy making and instructions issuance roles.*
23. ODISP should be renamed to the **Office of Program Policy (OPP).***

Office of Disability and Income Security Programs Response to Office of Inspector General's Audit on Reorganization

Thank you for the opportunity to comment on attached draft report on the organizational review of ODISP. Similar to OIG's stated objective, our objective in reviewing and responding to the report was to determine what changes to ODISP would best assist the agency in administering the OASDI, SSI and Medicare programs. We believe it is critically important for SSA to have a strong program policy component to provide direct support to SSA's operational components, to allow for data driven decisions on future program and policy changes, and to provide Agency-wide leadership and expertise in managing SSA's programs.

Overall, we agree with the five broad conclusions in the report:

- Redirect ODISP's focus to program policy
- Align similar/related functions within ODISP
- Delineate more clearly the role of ODISP with respect to other components
- Improve communications within ODISP and other components
- Consider re-naming ODISP and the Office of Policy to clarify the roles of each component, or combine ODISP with the Office of Policy.

We also agree with many of the specific proposals for change and where we disagree, we offer an alternative or provide rationale for not changing a particular structure or function. Throughout, we have been guided by the broad principles outlined in OIG's report.

Immediate Front Office Staff

Assistant Deputy Commissioners: We recognize that ODISP has two Assistant Deputy Commissioners, primarily due to its previous role as the parent component for OHA. Given that this has changed, we agree to the recommendation of having only one Assistant Deputy Commissioner.

Other immediate front office staff: We began examining the structure of our immediate front office prior to the release of this report, and have since redeployed some of the staff to other components within ODISP. The majority of our remaining immediate front office staff consists of the Budget and Planning Staff, the Program Coordination Staff (which processes audits, Congressionals and other controls), and the (Human) Resource Management Staff. We believe these teams are necessary for the critical functions they perform for ODISP. Throughout headquarters, these functions are performed at every deputy level component and staffed in roughly the same proportions to size and scope of function as they are in ODISP. We note that in DCO, many of these functions are performed by Associate Commissioner components, so they don't appear organizationally in the front office.

We recommend that this staff and related functions remain in place to assist in meeting the day to day mission of ODISP. However, we also recommend placing all these functions under the

Executive Officer position. Our current Executive Officer position does not include responsibility for the Planning and Budget Staff.

Medicare Part D SAU

We agree with the recommendation that the Subsidy Appeals Unit, which does not perform any policy-making functions, be located in the Office of Disability Adjudication and Review which handles other appeals.

Office of Regulations (OR)

We would like to make a clarification to the IG's report: OGC reviews every regulation but the component with the responsibility for the specific program area *drafts* the regulation. However, we are open to the recommendation that the Office of Regulations be transferred to SSA's Office of General Counsel (OGC). As an alternative, this function could be transferred to the Office of the Deputy Commissioner for SSA since he is the designated Regulations Policy Officer. This would be similar to several other federal agencies' placement of the Regulation function.

Office of Programs Systems and Innovations Management (OPSIM)

OPSIM develops and maintains programmatic and administrative systems for ODISP, ensures systems security requirement compliance, provides awareness training and technical user support for ODISP staff, and oversees information technology contracts and budget. These functions are similar in size and scope to those performed by component support staffs in DCO HQ and the Regional Offices. Our technical user support staff responds to over 100 service calls a week; most of which are resolved in under an hour. Our programming staff develops creative administrative and programmatic systems solutions to support our ability to manage SSA's programs. While they are critically important to our mission, these systems are generally of limited scope and would likely not receive funding through the ITAB process, which focuses on IT solutions with national implications. One of the programs developed by ODISP, Web Bass, is being used throughout headquarters to manage administrative activities. We believe this and similar programming staffs in DCO HQ and the RO's provide a necessary supplement to DCS's programming capacity.

PolicyNet: OPSIM also manages, maintains, and enhances PolicyNet, which is an online system containing the laws, regulations, policies and procedures of the programs administered by SSA. PolicyNet is an enormous system which contains over 250,000 "screens" of policy and procedural content and receives over 15 million hits a month from SSA users. It provides essential support to SSA's front line employees and critical information about SSA's processes to the public, congressional staffs and advocacy groups.

ODISP created PolicyNet and has managed it effectively for more than 10 years. We are concerned that if PolicyNet is moved to Systems, it will receive insufficient resources and management attention, given all the other priorities of DCS. Quite frankly, we fear that the efficient issuances of program instructions and other policy issuances will be jeopardized if

PolicyNet is moved out of ODISP. It has been and it continues to be one of our highest priorities.

This is a particularly critical time for PolicyNet since we are working with all involved components to totally revamp the ”look and feel” and functionality of the Program Operations Manual System (POMS), which is by far the largest policy repository on PolicyNet. We have worked with contractors to create system prototypes and demonstrations and we have created a management structure which includes an AC-level Steering Committee and intercomponent workgroups. The AC Steering Committee recently approved our proposed approach and we are working diligently with user components to implement it. Moving PolicyNet out of ODISP could seriously impede this multi-year initiative.

We also believe that keeping it in ODISP allows us to continually improve PolicyNet since our program specialists and authors are in regular contact with users around the country and have first hand knowledge of their concerns. We strongly recommend that PolicyNet remain in OPSIM and that OPSIM remain a part of ODISP, as it is an integral part of ODISP’s mission.

Classification issue: We should note that last year when we designed the OPSIM organization, we recommended that it be classified as an Associate Commissioner level component. We understand that the decision to classify it as a GS-15 Director with a GS-15 Deputy Director was in part based on the unavailability of SES slots. However, we continue to believe this component of nearly 100 employees performs highly technical and highly critical functions to support ODISP and Operations as a whole and should be classified as an Associate Commissioner level component. If Commissioner Astrue agrees and designates an SES slot to this position, we would consolidate the sub-components within OPSIM into two Offices, each headed by a GS 15 Office Director.

Certification and Accreditation Issue: On page 5 of the report , OIG mentions that ODISP does not always follow SSA’s policies and procedures relating to systems development since we developed our own C&A process instead of the one established by the CIO. We believe this is incorrect. Our systems security staff, located in OPSIM, does follow the CIO’s process which is based on the National Institution of Standards and Technology requirements to comply with the *Federal Information Security Management Act*. The CIO approved all C&A packages for previous years submitted from ODISP. This year, the current C&A process for the Integrated Disability Management System includes the demonstration projects. This was done with OCIO’s consent. We are unaware of any C&A requirements that we have not met.

Office of Medical and Vocational Expertise (OMVE)

The OIG report correctly states that the OMVE performs both program policy and operational functions. In addition to processing initial disability cases from state DDSs, OMVE plays a significant role in the formulation and maintenance of disability policies and procedures.

With this in mind, we mostly agree with OIG’s recommendation to move OMVE to the Office of Operations. But we also believe this review gives us the opportunity to consolidate our disability

program analysis functions into one component within ODISP, which would strengthen our ability to develop sound, data driven program policy.

Specifically, we believe most of OMVE should be transferred to DCO to help the DDSs process initial disability claims. The remaining portion of OMVE should be combined with the other program analysis functions within OPDR and ODP to form a new component named the *Office of Program Studies and Analysis (OPSA).* This new component would 1) conduct studies and analysis on live disability cases as is currently done in OMVE; 2) develop disability management information and conduct data analysis as is currently performed in ODP; and 3) perform program development activities such as live demonstration models, currently performed in OPDR. We discuss this proposed new organization in more detail later in this paper.

Registry of Medical Experts: Commissioner Astrue has discussed development of a national registry of medical experts that could be utilized by DDS and ODAR adjudicators. We are also aware of concerns raised by Operations about current state medical experts vs. federal medical experts. Because the registry would exist to support adjudicators in operational components and would not serve a role in program policy, we believe that the registry should be developed and maintained by either DCO or ODAR.

Office of Disability Programs (ODP)

ODP is responsible for disability program policy, including the electronic disability process; disability management information and analysis; and the Requests for Program Consultation (RPC) pilot program currently operating in SSA's Boston and Denver Regions. As noted above, we recommend that the disability management information and analysis function within ODP be moved to the proposed OPSA.

CDR Program Policy: We recommend that ODP absorb the Continuing Disability Review (CDR) program policy from the OPDR. We believe that this policy function aligns with the current functions of ODP.

Professional Relations Staff: We also propose transferring the Professional Relations Staff in ODP to DCO/ODD. Many years ago, the Office of Disability had a robust professional relations staff that was used to recruit consultative examiners, and interface with DDS professional relations staff. Over time, this function was downgraded in lieu of policy responsibilities. With the transfer of the DDSs from ODISP to DCO, the people in the Professional Relations Staff were formally reassigned to policy-related duties. However, the designated personnel were never actually transferred to DCO.

We propose doing so at this time. This would involve sending all six former Professional Relations Staff employees to ODD at the end of the fiscal year. This will formally resolve a longstanding and somewhat acrimonious debate, over whether all appropriate personnel were transferred to DCO at the time DCO took responsibility for the DDSs. We recommend that ODD use these employees to support the new medical and vocational registry. This function will require significant work with DDS professional relations staff around the country.

Electronic Processing Policy Staff, Medical Officers, and RPC initiative: We are currently reviewing the functions of ODP's Electronic Processing Policy staff and ensuring that this group is only responsible for policy issues. We are also reviewing the role of ODP's medical officers and considering the option of keeping two medical doctors on staff in ODP and transferring the remainder of the doctors to the proposed new OPSA. Lastly, we are assessing the staffing needs to support a nationwide rollout of the RPC initiative. It is likely that we will need additional staff for this function.

Office of Program Development and Research (OPDR)

We agree that in order to re-focus ODISP's mission on program policy, OPDR's functions should be transferred to other SSA components. However, we do not recommend moving the program development function to the Office of Policy (OP). Instead, we propose that the demonstration projects (demos) from OPDR be transferred to the proposed new OPSA which is discussed in detail later in the paper. The demos are applied research involving actual claimants and close coordination with Operations. OP on the other hand, usually conducts higher level research, which often involves simulation modeling, demographic projections and long term studies. We believe it is fundamentally different from the disability demos which more accurately should be called program development.

CDR Profiling and Selection function: We agree that this function should be moved out of ODISP. However, we believe it should be moved to the Office of Quality Performance (OQP) rather than DCO, since this function is similar to OQP's role in T16 redetermination profiling and selection.

Work Incentive and Ticket functions: Finally, we agree that OPDR's work incentive and ticket to work functions would be better placed in the component primarily responsible for these programs—ODISP's Office of Employment Support Programs.

Office of International Programs (OIP)

We agree with the recommendations in the report and we have no reasons to modify OIP's structures or functions.

Office of Income Security Programs (OISP)

OISP performs a variety of functions related to the Old-Age and Survivors Insurance, Supplemental Security Income, and Medicare programs, including: developing, coordinating, evaluating and issuing policies, standards and instructions; developing agreements with the States and other agencies that govern State supplementation programs, Medicaid eligibility, data exchange programs, food stamps and fiscal reporting processes; and implementing provisions of the Computer Matching and Privacy Protection Act. We agree that some of OISP's functions are not directly related to program policy and they should be moved elsewhere in the agency.

Limited English Proficient, Asian American Pacific Islander and Older Indian Outreach: We fully agree that it may be a better fit to move the limited English speaking, Asian-Pacific and other similar outreach activities (such as Older Indian Outreach) to SSA's Office of Communications (OCOMM) since these efforts relate to communications and outreach, and not policy development.

Information Exchange/Data Matching Agreements and Electronic Authentication: We also agree that OISP's responsibilities with regard to information exchange and matching may be better suited in SSA's Office of General Counsel/Office of Public Disclosure for privacy issues. Given that OGC already performs a key role in data exchanges, which are essentially contractual agreements, it may be a better fit to move this function to OGC rather than keep it in ODISP. We also propose to transfer the electronic authentication policy function to the Office of Public Disclosure in OGC since authentication for online services and data access is essentially a disclosure issue.

Office of Employment Support Programs (OESP)

OESP was created in 1999 to assist individuals with disabilities who want to become more self-sufficient through work. OESP develops informational materials to increase public understanding of the Ticket to Work program and supports the employment efforts of Social Security beneficiaries with disabilities. They also implement provisions of the Social Security Act which facilitate access to rehabilitation and other forms of employment support services through the Ticket to Work and Self-Sufficiency Program (Ticket). Finally, OESP approves payments to service providers and ensures that beneficiary participation in the program is appropriate.

Payments to State VR and ENs: We agree that OESP performs both policy and operational functions. To that end, we recommend that OESP transfer its function of payments to service providers such as employment networks and the Vocational Rehabilitation Agencies to DCO. We recommend that this function be phased in gradually after the publication of the Final Ticket to Work rules to ensure a smooth transition.

Work Incentives and Contracts/Grants: As mentioned above, we also agree with the recommendation that OESP be responsible for all work incentives in conjunction with the Ticket to Work program. However, we disagree that the functions of awarding contracts and grants and cooperative agreements should be transferred to DCO. We believe these functions should stay in OESP as they are not really operational workloads. Rather, they are activities that are completely related to OESP's ability to effectively implement and manage the Ticket to Work Program. OESP project officers provide the depth of working knowledge needed to administer contracts, grants and cooperative agreements. At the same time, they also provide guidance on program policy issues to answer policy related technical questions with contractors who help administer the Ticket to Work program. If these functions were segmented, accountability and overall management of these programs would make it difficult to have a high quality Ticket program.

Proposed: Office of Programs Studies and Analysis (OPSA)

As mentioned earlier in this report, we propose that ODISP's program analysis functions be consolidated into a single new component named the *Office of Program Studies and Analysis (OPSA).* This component would be comprised of the disability case studies and analysis function currently performed in OMVE; the disability data development and analysis currently performed in ODP; and the disability program development currently performed in OPDR. The rationale for moving each of these functions into OPSA is discussed below.

OMVE's case studies and analysis function: The Federal Disability Determination Services (FDDS) formed the nucleus of the OMVE. The memo that established the FDDS in 1986 stated, "….the major purpose of the FDDS is to help in the development and application of new policies and secondarily to help manage State DDS workloads…" The analytical part of OMVE serves an important function for ODISP since it provides for studies and analysis of actual cases to help develop new policies, procedures, and system modifications.
We believe this portion of OMVE's function and staff should remain in ODISP, as noted above. Studies are an integral part of program policy development since they enable us to make program policy changes based on hard data, not conjecture or anecdotal information. To work effectively, disability study staff needs to be part of the organization that is responsible for developing disability program policy. Separating staff who conduct studies from actual program policy development reduces efficiency, and possibly the quality and usefulness of the research.

ODP's disability data development and analysis function: The Office of Disability Program Information and Studies (ODPIS) is the central source of programmatic disability data, and related data analysis, for developing disability policy in the Agency. It is also the central source of disability data for the Commissioner, all other SSA components and the OIG. And it is the central source of disability data for Congress, GAO, the Social Security Advisory Board, press inquiries, and many other external entities.

ODPIS is an integral part of, and plays an essential role in, ODISP. It is not an exaggeration to say that very little disability program policy is developed without ODPIS involvement. Over 90% of ODPIS's work is programmatic and policy-related; less than 10% of their resources are used for operational and workload support.[1]

Even the apparently "simple" production of programmatic data often involves more complex policy considerations. This requires close work with other policy components within ODISP and understanding of what the data means and can actually show. A great deal of the data that ODPIS produces, especially for people outside of ODISP and outside the Agency, requires technical, narrative explanation of what the data show and what they do *not* show. And, in an effort to avoid "silos" of management information, ODPIS looks across all adjudicative levels in an effort to promote collection, and analysis of, disability programmatic data.

[1] One of the primary reasons for this is that ODPIS has automated most operational and workload data so that they are easily available on ODPIS' Intranet site. This information is also easily manipulated by budget personnel in many different SSA components.

In addition, to effectively carry out studies and thus, policy development, in the information age requires easy access to the best and most up-to-date programmatic data available. For example, disability studies need both program support and data support, from individuals who understand disability and disability programs. For that reason, it is critical for study staff and data analysis staff to work together in the same component.

The data analysis staff is not simply comprised of technicians who pull data, but are analysts who provide an integral part of the study design process. It is their understanding of the disability program and the disability databases that help study design and evaluation staff to identify necessary variables and determine study, including demonstration project, parameters. The entire process of conducting rigorous studies involves constant communication and shared work between data analysts and program developers. Separating disability data analysts from analysts with study expertise adds an administration burden that will affect the timeliness and quality of our analytical efforts.

We are also concerned that moving ODPIS out of ODISP could seriously compromise a Commissioner-level initiative -- the RPC process. ODPIS has been instrumental in overseeing development of a management information database for eRPC. While Lockheed-Martin has been building the application, ODPIS has provided close oversight to ensure that the application meets the Agency's needs. We are very impressed with the progress on this tool to date. With proper oversight, the tool will be ready for national rollout in FY 2007. However, we are concerned that a major upheaval in this division could divert attention and oversight from this critical project precisely when we are contemplating a national rollout of the project.

OPDR's disability program development function: This refers to the disability demonstration models that are managed by OPDR. The purpose of the demos is to test alternates to current policy and procedures in a live, carefully designed test environment. In the federal sector, the results of formal demonstration models are often used by agencies and Congress as a basis for major policy changes. As such, it is critically important that demonstrations be rigorously evaluated. We believe it is essential that demonstration projects be designed by study experts, program experts, and data analysts in one component to provide an environment in which projects are appropriately designed, implemented, and evaluated.

Without a strong linkage and collaborative effort between program development and the evaluation design, the structure of the program may ultimately not yield the essential information needed to answer the policy question of interest. A basic illustration is when an intervention is designed without strong programmatic considerations the program may fail to enroll the necessary numbers of participants, thus providing statistically insignificant results, ultimately rendering any evaluation effort useless. A recent GAO report found that housing both programmatic design and evaluation in one structure has been effective in achieving meaningful evaluation results from their programs. (the GAO report is, *Program Evaluation: An Evaluation Culture and Collaborative Partnerships Help Build Agency Capacity*.")

A final consideration for keeping this function within ODISP is the fact that the disability demos are at a critical stage. The demos took several years to establish and Congress, OMB, and the

advocates anxiously await the results. It is important for SSA to maintain the current momentum toward successful completion of the demos.

Communication

The issue of communication is a key consideration of ours in developing a proposed reorganization because we believe the structure of new organization would help define our mission and improve internal and external communications in ODISP. We recognize that the OIG report focuses on how ODISP functioned during recent years and we agree that this was a period in which there was a significant lack of communication both within ODISP and between ODISP and other components. We would like to make the point that this is not how ODISP and its components have traditionally functioned in the past and we have already made changes to improve future communications throughout ODISP and with other SSA components.

While previous management decisions were made to restrict access of information about the development of recent changes to the disability program, it is understood within our current organization that all relevant agency components should be involved when policy issues are considered. As an example, by regulation the Agency established a formal process for including our peers when addressing disability policy issues. The Disability Program Policy Council was established to recommend changes in our disability policies and procedures in order to improve the quality of our disability determination process. While this Council is chaired by the Deputy Commissioner for ODISP, it also includes representatives from components that are responsible for the operations of the disability determination process (DCO and ODAR), as well as the OQP and OGC. Under previous ODISP management, this group rarely met and never fulfilled the regulatory intent. We are committed to reinstating this group to continue this approach in the development of disability policy.

Additionally, our component has a long tradition of open communication and disseminating program policy information among our peers through traditional methods such as intercomponent workgroups, Admistrators letters and highlight reports, disability hour IVT broadcasts, the electronic disability guide (eDG), PolicyNet, etc. While we cannot immediately repair the harm done to the relationships between ODISP and our peers due to the restricted information policy that was implemented under previous management, we remain committed to our tradition of open communication in both the development and dissemination of policy.

Internally, the Acting Deputy Commissioner has already taken steps to ensure consistent and open communication. To illustrate this point, we have already seen improvements in this area with weekly meetings between the executives in ODISP to promote intercomponent awareness and collaboration. These meetings have begun to foster honest communication and open dialogue while also serving as a model for Associate Commissioners to practice top down communications within their own components.

The Acting Deputy Commissioner also implemented a true “open door” policy with ODISP staff and other SSA components. We have already begun to realize significant progress in this area as individuals within ODISP are now more aware of what other ODISP offices are doing and are committed to better coordination among Agency components.

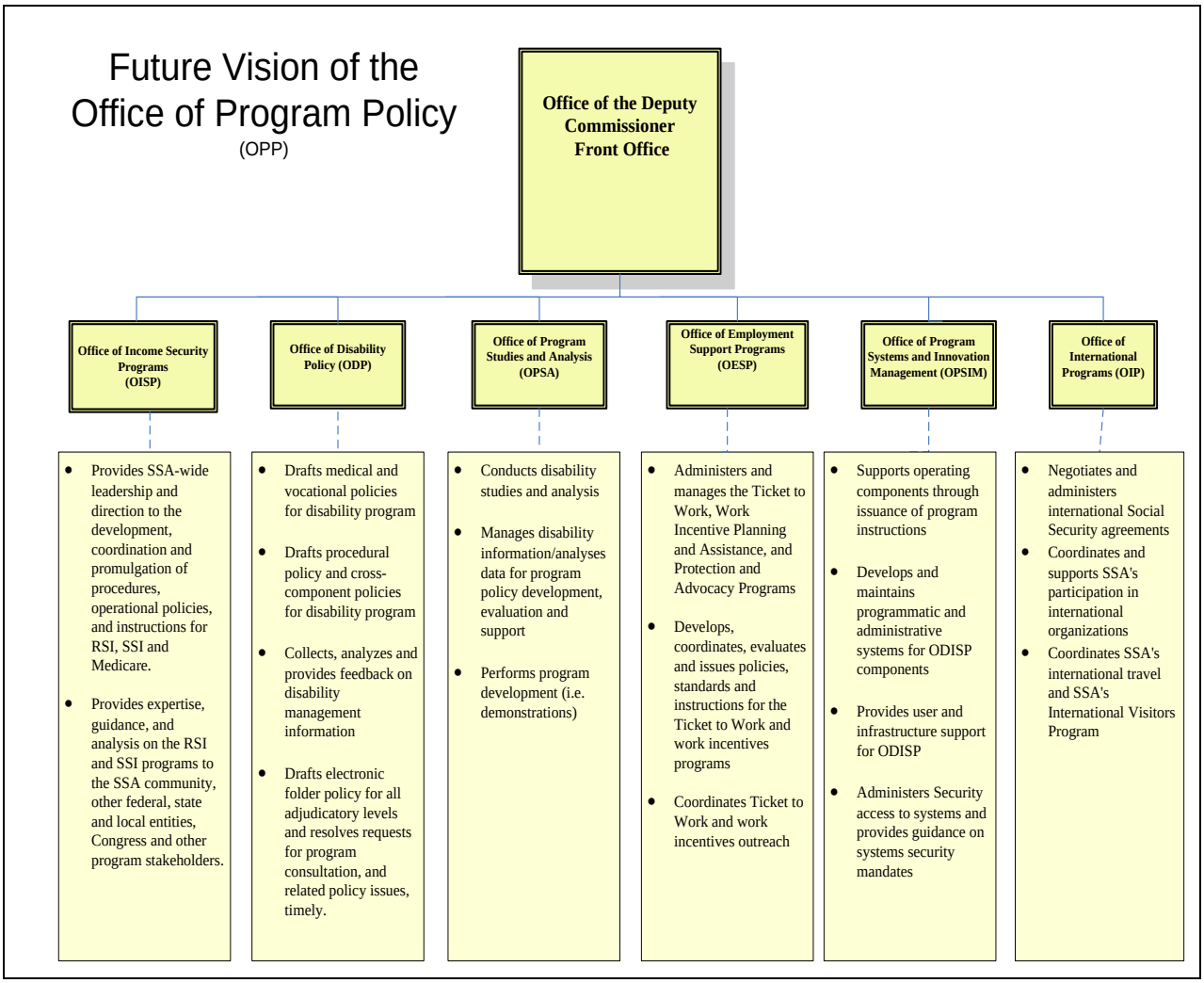
Process for tracking pending program policy issues: To provide timely, responsive service to other SSA components on disability issues, and to address a specific OIG recommendation, we are also considering options for creating a centralized process within ODISP to track the pending issues and their progress toward resolution. This process would be developed in partnership with other HQ components and would include agreed upon timeframes and expected outcomes that would help facilitate efficient development and implementation on program policy solutions across the Agency.

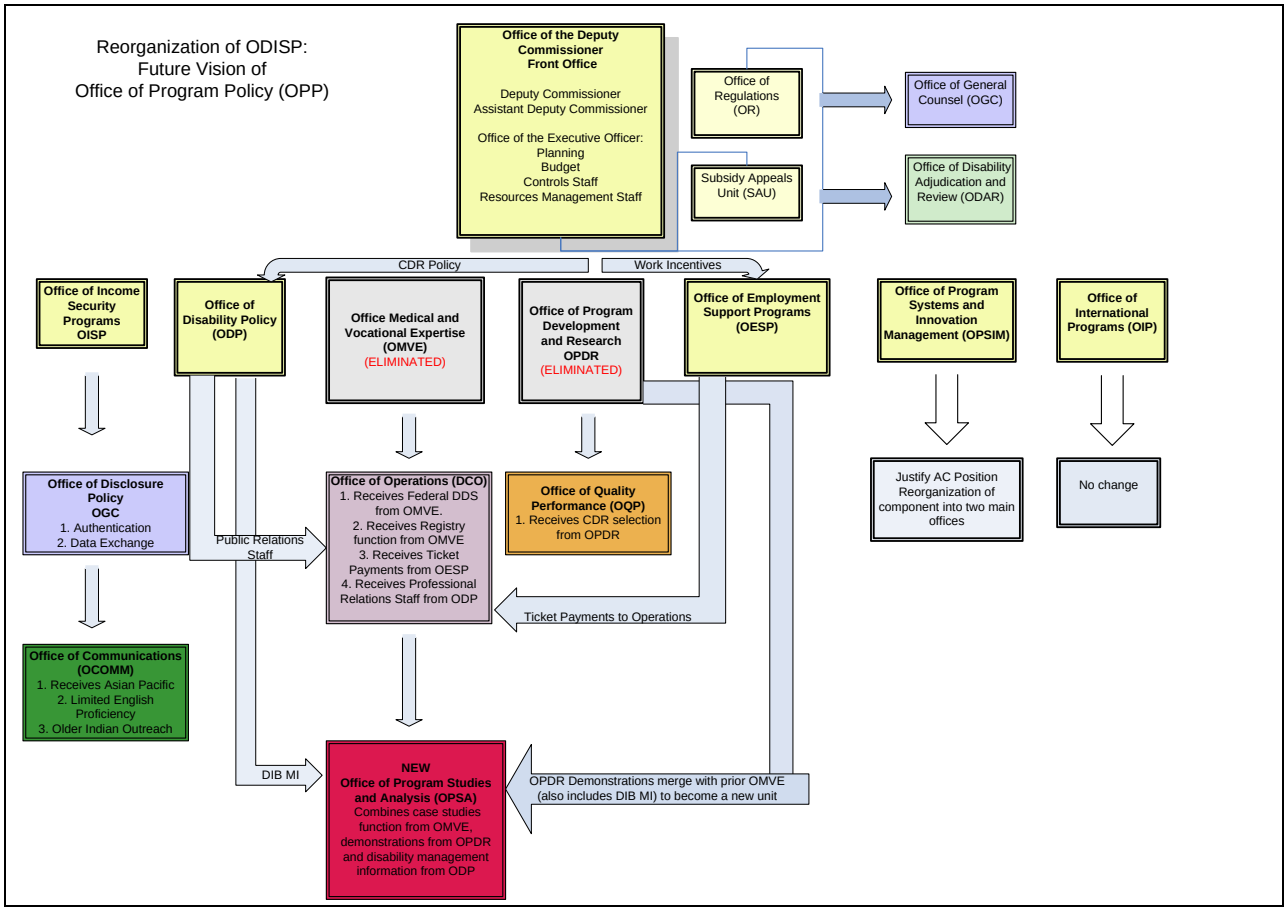
ODAR Policy Instructions: The OIG report recommends that we clarify the respective policy making and instructions issuance roles of ODISP and ODAR. We agree and will begin meeting with ODAR in the coming weeks to discuss this long standing problem area.

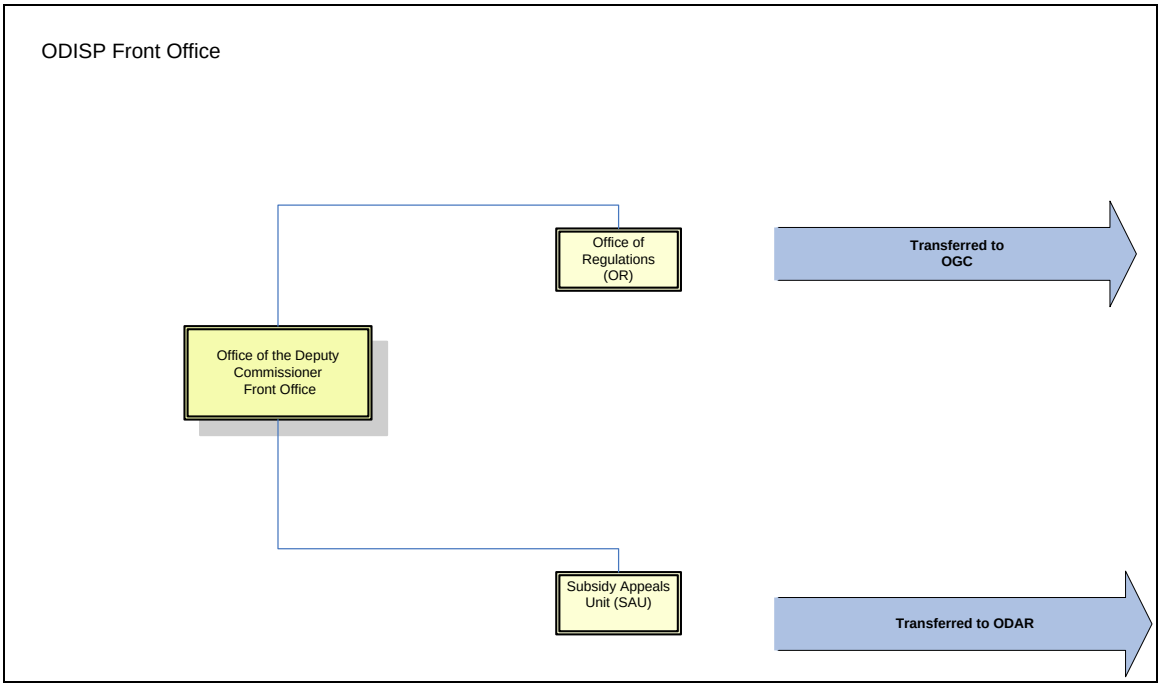
Re-naming ODISP: We also agree that SSA should consider renaming our component to better reflect the core mission of generating and managing program policy. To that end, we recommend that our component be named the **Office of Program Policy.** This would help clarify the distinction between our office and the Office of Policy, which primarily conducts and publishes long range research studies, statistical analyses and evaluations.

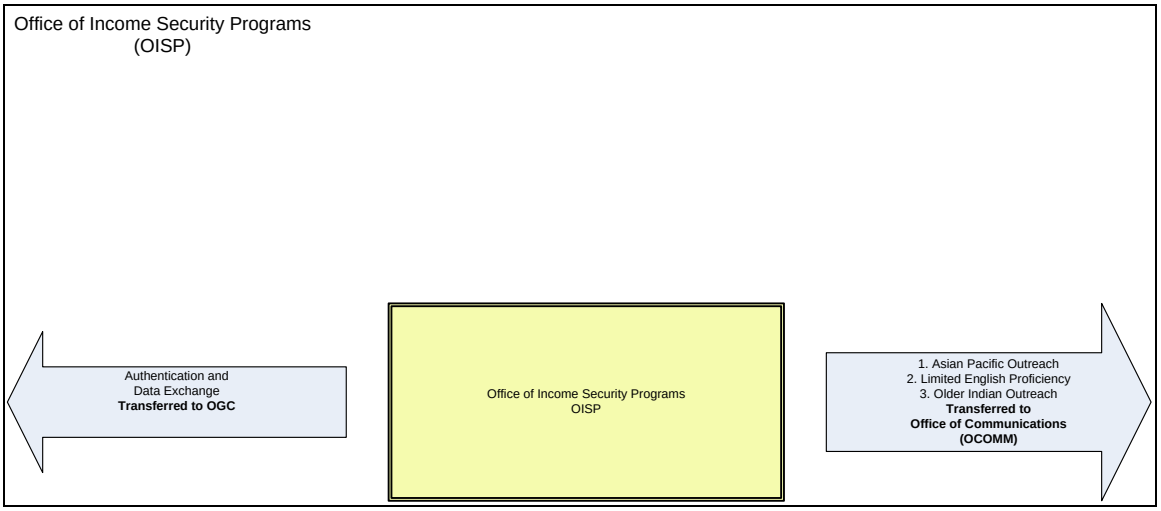
Conclusion

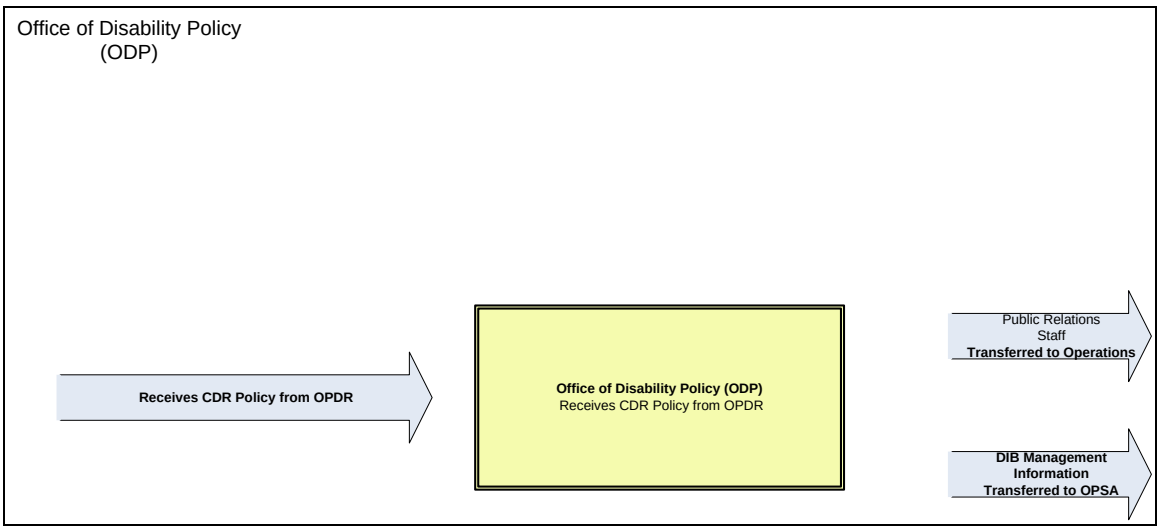
We greatly appreciate the review and analysis performed by OIG and as this response reflects, we agree with many of OIG's recommendations. We also used the broad principles outlined in the report to guide us in developing additional proposals which we believe will strengthen ODISP's ability to be a robust program policy component. Throughout its history, under various names and combination of functions, ODISP has always been tasked with the critical role of developing and maintaining SSA's programs. The fact that this component is usually headed by a political appointee further indicates the importance that SSA has placed on this function. Our sole objective in reviewing the OIG report and offering additional recommendations for change is to design an organization that can best meet these challenges in today's changing environment.

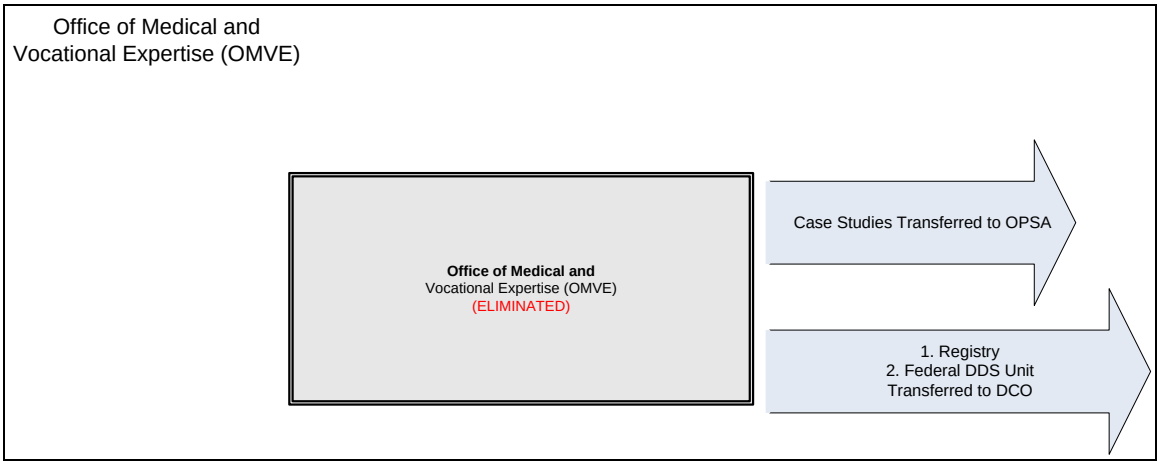

Future Vision of the Office of Program Policy
(OPP)
Office of the Deputy Commissioner Front Office
Office of Income Security Programs (OISP)
Office of Disability Policy (ODP)
Office of Program Studies and Analysis (OPSA)
Office of Employment Support Programs (OESP)
Office of Program Systems and Innovation Management (OPSIM)
Office of International Programs (OIP)
Provides SSA-wide leadership and direction to the development, coordination and promulgation of procedures, operational policies, and instructions for RSI, SSI and Medicare.
Provides expertise, guidance, and analysis on the RSI and SSI programs to the SSA community, other federal, state and local entities, Congress and other program stakeholders.
Drafts medical and vocational policies for disability program
Drafts procedural policy and cross-component policies for disability program
Collects, analyzes and provides feedback on disability management information
Drafts electronic folder policy for all adjudicatory levels and resolves requests for program consultation, and related policy issues, timely.
Conducts disability studies and analysis
Manages disability information/analyses data for program policy development, evaluation and support
Performs program development (i.e. demonstrations)
Administers and manages the Ticket to Work, Work Incentive Planning and Assistance, and Protection and Advocacy Programs
Develops, coordinates, evaluates and issues policies, standards and instructions for the Ticket to Work and work incentives programs
Coordinates Ticket to Work and work incentives outreach
Supports operating components through issuance of program instructions
Develops and maintains programmatic and administrative systems for ODISP components
Provides user and infrastructure support for ODISP
Administers Security access to systems and provides guidance on systems security mandates
Negotiates and administers international Social Security agreements
Coordinates and supports SSA's participation in international organizations
Coordinates SSA's international travel and SSA's International Visitors Program

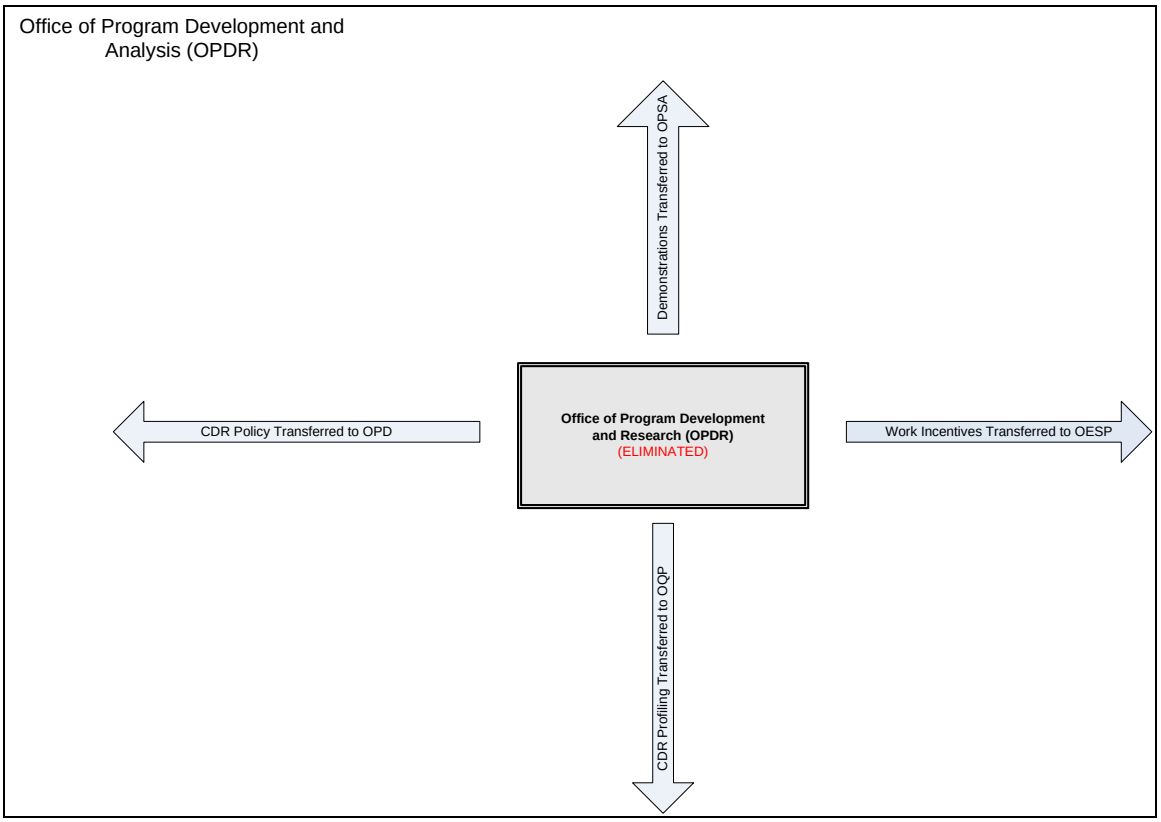

Reorganization of ODISP:
Future Vision of
Office of Program Policy (OPP)
Office of the Deputy Commissioner Front Office
Deputy Commissioner
Assistant Deputy Commissioner
Office of the Executive Officer:
Planning
Budget
Controls Staff
Resources Management Staff
Office of Regulations (OR)
Office of General Counsel (OGC)
Subsidy Appeals Unit (SAU)
Office of Disability Adjudication and Review (ODAR)
CDR Policy
Work Incentives
Office of Income Security Programs OISP
Office of Disability Policy (ODP)
Office Medical and Vocational Expertise (OMVE) (ELIMINATED)
Office of Program Development and Research OPDR (ELIMINATED)
Office of Employment Support Programs (OESP)
Office of Program Systems and Innovation Management (OPSIM)
Office of International Programs (OIP)
Office of Disclosure Policy OGC
1. Authentication
2. Data Exchange
Public Relations Staff
Office of Operations (DCO)
1. Receives Federal DDS from OMVE.
2. Receives Registry function from OMVE
3. Receives Ticket Payments from OESP
4. Receives Professional Relations Staff from ODP
Office of Quality Performance (OQP)
1. Receives CDR selection from OPDR
Ticket Payments to Operations
Justify AC Position Reorganization of component into two main offices
No change
Office of Communications (OCOMM)
1. Receives Asian Pacific
2. Limited English Proficiency
3. Older Indian Outreach
DIB MI
NEW
Office of Program Studies and Analysis (OPSA)
Combines case studies function from OMVE, demonstrations from OPDR and disability management information from ODP
OPDR Demonstrations merge with prior OMVE (also includes DIB MI) to become a new unit

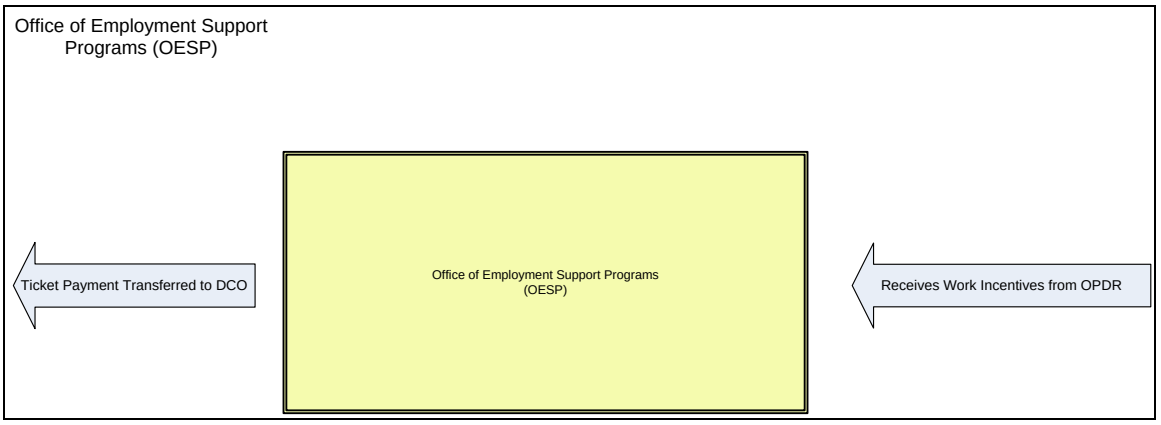

ODISP Front Office
Office of Regulations (OR)
Transferred to OGC
Office of the Deputy Commissioner Front Office
Subsidy Appeals Unit (SAU)
Transferred to ODAR

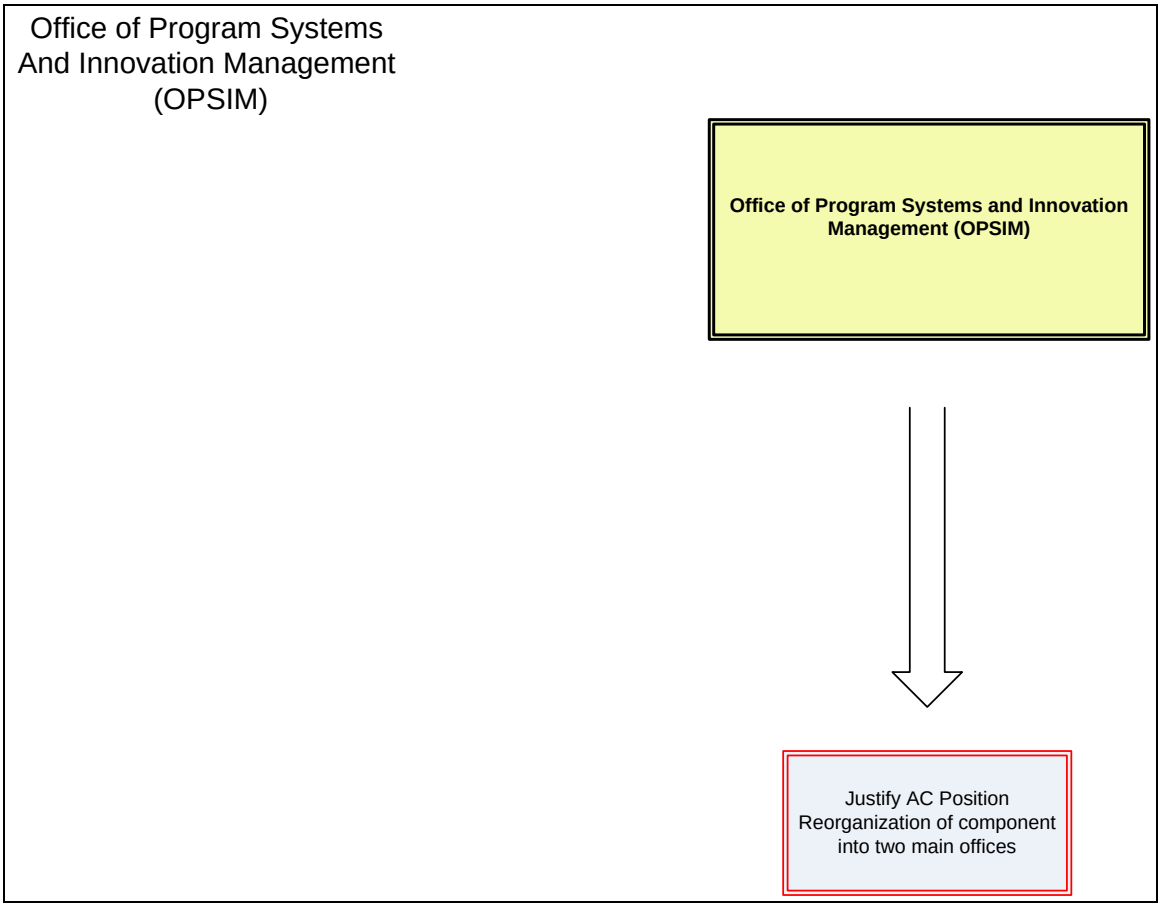

Office of Income Security Programs (OISP)
Authentication and Data Exchange
Transferred to OGC
Office of Income Security Programs
OISP
1. Asian Pacific Outreach
2. Limited English Proficiency
3. Older Indian Outreach
Transferred to
Office of Communications
(OCOMM)

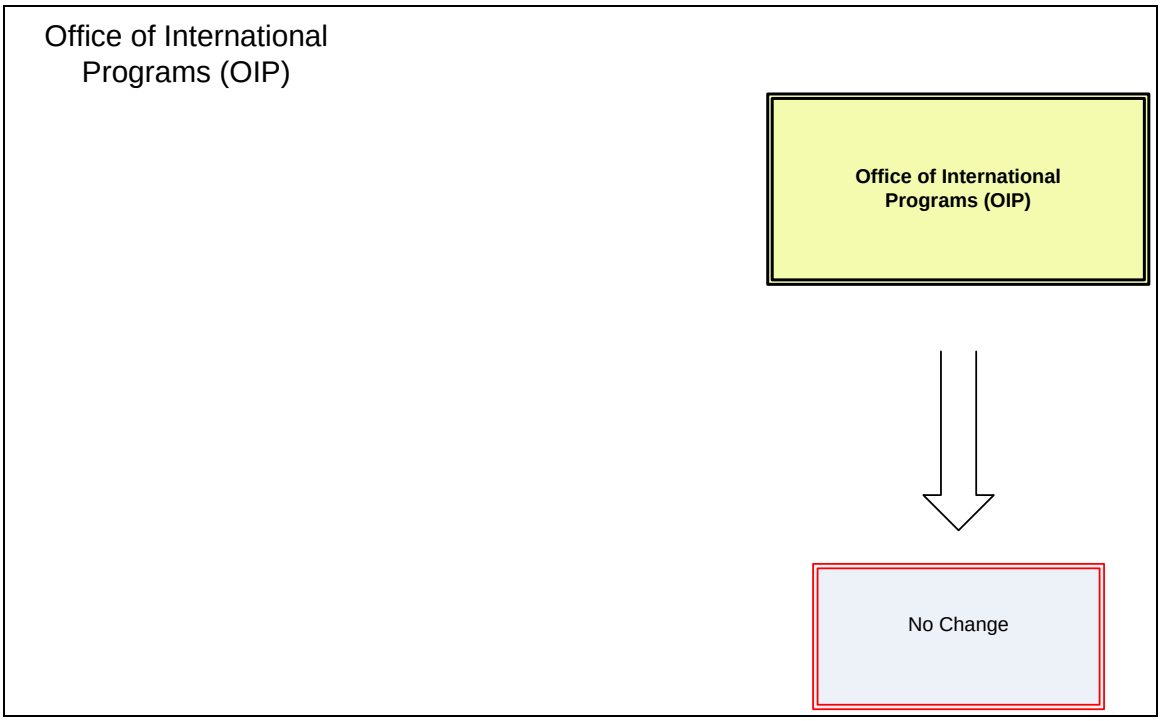

Office of Disability Policy
(ODP)
Receives CDR Policy from OPDR
Office of Disability Policy (ODP)
Receives CDR Policy from OPDR
Public Relations
Staff
Transferred to Operations
DIB Management
Information
Transferred to OPSA

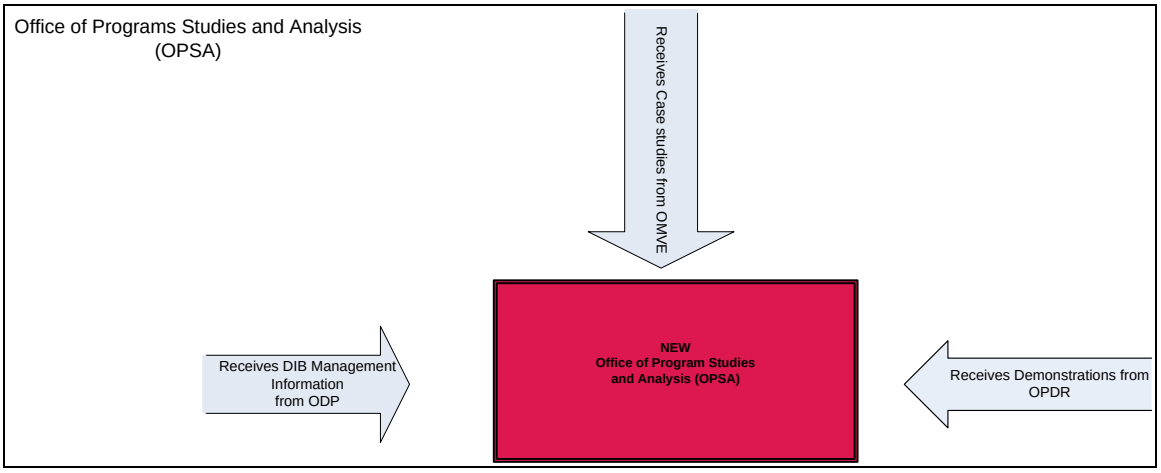

Office of Medical and
Vocational Expertise (OMVE)
Office of Medical and
Vocational Expertise (OMVE)
(ELIMINATED)
Case Studies Transferred to OPSA
1. Registry
2. Federal DDS Unit
Transferred to DCO


Office of Program Development and Analysis (OPDR)
Demonstrations Transferred to OPSA
CDR Policy Transferred to OPD
Office of Program Development and Research (OPDR)
(ELIMINATED)
Work Incentives Transferred to OESP
CDR Profiling Transferred to OQP


Office of Employment Support Programs (OESP)
Ticket Payment Transferred to DCO
Office of Employment Support Programs (OESP)
Receives Work Incentives from OPDR


Office of Program Systems
And Innovation Management
(OPSIM)
Office of Program Systems and Innovation Management (OPSIM)
Justify AC Position
Reorganization of component
into two main offices


Office of International Programs (OIP)
Office of International Programs (OIP)
No Change


Office of Programs Studies and Analysis (OPSA)
Receives Case studies from OMVE
Receives DIB Management Information from ODP
NEW
Office of Program Studies and Analysis (OPSA)
Receives Demonstrations from OPDR

OBFM Comments

SOCIAL SECURITY

MEMORANDUM 20070503-0037703

Date: May 9, 2007 Refer To: S1J3

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

From: Dale W. Sopper /s/
Deputy Commissioner for
Budget, Finance and Management

Subject: The Office of Inspector General's (OIG) Draft Report, "Organizational Review of the Office of Disability and Income Security Programs (ODISP)"--INFORMATION

I have reviewed the above subject draft report and offer the following comments:

Page 6- Description of the functions of the Office of Income Security Programs—the second bullet

- Developing agreements with the States and other agencies that govern State supplementation programs, Medicaid eligibility, data exchange programs, food stamps and fiscal reporting processes;

I agree with the conclusion that ODISP's responsibilities with regard to information exchange and matching may be better suited elsewhere. I do not agree with the recommendation that they be moved to either Office of General Counsel (OGC) or Office of Systems. While OGC has oversight of the legal aspects of the agreements and Office of Public Disclosure within OGC makes the determinations relating to the release of the information, OGC's role is limited in scope. The Office of Systems' role is limited to enabling the technical connection.

The Office of the Chief Information Officer, as a policy component, is better suited for this function considering the fact that not only is it responsible for information technology, but has the lead on security of Personally Identifiable Information (the core content of the data exchanges). The Office of Systems Security Operations (OSSOM), within OBFM should also be considered as an alternate repository for this function. Throughout the history of data exchange at SSA, OSSOM has been the convergence point to which all other Agency components come for interpretation of security guidelines. OSSOM has a long and well-documented history of addressing the global issues of data exchange. While OSSOM is only responsible for oversight and monitoring compliance with information security guidelines, through our reviews we are the

only component monitoring and enabling compliance with contractual obligations and disclosure policy. OSSOM is involved in all aspects of data exchange across all SSA components, including the Office of International Operations for foreign data exchanges.

Additionally, it should be noted that the three agencies mentioned in the report for comparison (Department of Labor, Department of Veterans Affairs and Centers for Medicare and Medicaid Services) do not perform the same service of net data provider that SSA performs.

OBFM through the Office of Acquisition and Grants has worked with ODISP staff over the years to develop a significant acquisition and contract management knowledge base. This is particularly so within the Office of Program Development and Research (relative to research and demonstration contracts) and the Office of Employment Support Programs (relative to Ticket to Work and Self-Sufficiency Program contracts). Consequently, I strongly recommend that any realignment of ODISP which would impact or transfer existing ODISP contracts ensure that this investment of staff knowledge remain with those contracts in order to promote efficiency and continuity

Finally, on page 11 the report discusses possible evaluation of the Office of Policy's role in relation to ODISP. We note that it suggests renaming the Office of Policy as the "Office of Strategic Planning and Research." However, this seems to conflict with the role of the existing Office of the Chief Strategic Officer.

Please call me if you wish to discuss. Staff questions may be referred to Candace Skurnik on extension 54636.

cc:
The Commissioner
Chief of Staff
Acting Deputy Commissioner for Disability and Income Security Programs
Assistance Inspector General Audit

OIG Contacts and Staff Acknowledgments

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Acknowledgments

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Nicholas Milanek, Senior Auditor
Mary Ellen Moyer, Senior Program Analyst
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Janet Stein-Pezza, Senior Program Analyst
Linda Webester, Senior Auditor
Kitt Winter, Director
Florence Wolford, Auditor

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Social Security Advisory Board

Overview of the Office of the Inspector General

The Office of the Inspector General (OIG) is comprised of our Office of Investigations (OI), Office of Audit (OA), Office of the Chief Counsel to the Inspector General (OCCIG), and Office of Resource Management (ORM). To ensure compliance with policies and procedures, internal controls, and professional standards, we also have a comprehensive Professional Responsibility and Quality Assurance program.

Office of Audit

OA conducts and/or supervises financial and performance audits of the Social Security Administration's (SSA) programs and operations and makes recommendations to ensure program objectives are achieved effectively and efficiently. Financial audits assess whether SSA's financial statements fairly present SSA's financial position, results of operations, and cash flow. Performance audits review the economy, efficiency, and effectiveness of SSA's programs and operations. OA also conducts short-term management and program evaluations and projects on issues of concern to SSA, Congress, and the general public.

Office of Investigations

OI conducts and coordinates investigative activity related to fraud, waste, abuse, and mismanagement in SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, third parties, or SSA employees performing their official duties. This office serves as OIG liaison to the Department of Justice on all matters relating to the investigations of SSA programs and personnel. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

Office of the Chief Counsel to the Inspector General

OCCIG provides independent legal advice and counsel to the IG on various matters, including statutes, regulations, legislation, and policy directives. OCCIG also advises the IG on investigative procedures and techniques, as well as on legal implications and conclusions to be drawn from audit and investigative material. Finally, OCCIG administers the Civil Monetary Penalty program.

Office of Resource Management

ORM supports OIG by providing information resource management and systems security. ORM also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, ORM is the focal point for OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act of 1993.