

Audit Report

Manually Reduced Cross-program
Recovery Overpayments

MEMORANDUM

Date: July 5, 2017 **Refer To:**
To: The Commissioner
From: Acting Inspector General
Subject: Manually Reduced Cross-program Recovery Overpayments (A-06-17-50225)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration improperly reduced Supplemental Security Income overpayments being collected from concurrent beneficiaries' Old-Age, Survivors and Disability Insurance benefits.

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

Gale Stallworth Stone

Gale Stallworth Stone

Attachment

Manually Reduced Cross-program Recovery Overpayments

A-06-17-50225



July 2017

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) improperly reduced Supplemental Security Income (SSI) overpayments being collected from concurrent beneficiaries' Old-Age, Survivors and Disability Insurance (OASDI) benefits.

Background

The OASDI program provides benefits to retired and disabled workers as well as their dependents and survivors. The SSI program provides payments to financially needy individuals who are aged, blind, or disabled.

When individuals who incurred SSI overpayments receive OASDI benefits, SSA can collect the overpayments from their OASDI benefits using cross-program recovery. SSA records the overpayments on the Recovery of Overpayments, Accounting and Reporting (ROAR) system, which SSA uses to manage OASDI overpayment collections.

SSA uses the Manual Adjustment, Credit, and Award Data Entry system (MACADE) to update overpayment information on ROAR. Some MACADE inputs reduce overpayment balances on ROAR even when SSA does not actually collect funds from the debtor. These inputs can cause erroneous reductions to overpayment balances on the SSI record.

Findings

Use of MACADE to adjust cross-program recovery overpayments erroneously reduced SSI overpayments that SSA was collecting from concurrent beneficiaries' OASDI benefits. Although SSA generally prohibits personnel from using MACADE to process these types of transactions, SSA did not implement system controls to prevent employees from inputting the transactions. Further, SSA issued contradictory guidance to employees that did not make it clear whether it was appropriate to use MACADE to process the inputs.

Based on our sample results, we estimate that, from January 2005 through March 2015, SSA erroneously reduced approximately \$58.1 million in SSI overpayments it was collecting from concurrent beneficiaries. Absent corrective action, we estimate these processing errors will erroneously reduce SSI overpayments by an additional \$7 million over the next 12 months.

Recommendations

We recommend SSA:

1. Consider the cost-effectiveness of implementing controls to prevent systems from erroneously reducing SSI overpayments.
2. Update policy and training materials to be clear and consistent on the use of MACADE to input cross-program recovery adjustments.
3. Consider the cost-effectiveness of identifying and re-establishing SSI overpayments erroneously reduced by MACADE adjustments.

SSA agreed with our recommendations.

TABLE OF CONTENTS

Objective	1
Background	1
Results of Review	2
MACADE Inputs Erroneously Reduced SSI Overpayments.....	3
Establish Collection Rate	3
Delete Overpayment	4
Stop Partial Recovery	4
Reduce Overpayment Balance	5
Other and Unknown Input Types.....	5
Systems and Policy Considerations	5
Conclusions.....	6
Recommendations.....	6
Agency Comments.....	7
Appendix A – Scope and Methodology	A-1
Appendix B – Sampling Methodology and Results	B-1
Appendix C – Agency Comments	C-1

ABBREVIATIONS

MACADE	Manual Adjustment, Credit, and Award Data Entry
MBR	Master Beneficiary Record
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
ROAR	Recovery of Overpayments, Accounting and Reporting
SSA	Social Security Administration
SSI	Supplemental Security Income
SSR	Supplemental Security Record

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) improperly reduced Supplemental Security Income (SSI) overpayments being collected from concurrent beneficiaries' Old-Age, Survivors and Disability Insurance (OASDI) benefits.

BACKGROUND

SSA administers the OASDI and SSI programs under Titles II and XVI of the *Social Security Act*, respectively.¹ The OASDI program provides benefits to retired and disabled workers as well as their dependents and survivors. The SSI program provides payments to financially needy individuals who are aged, blind, or disabled.

An overpayment is the total amount an individual received for any period that exceeded the total amount the individual should have received for that period. With a few exceptions, overpaid individuals are responsible for repaying the overpayments.² When individuals who have incurred SSI overpayments are receiving OASDI benefits, SSA can collect the overpayments from their OASDI benefits using cross-program recovery.³ To collect an overpayment from an individual's OASDI benefits, SSA records the overpayment on the Recovery of Overpayments, Accounting and Reporting (ROAR) system, which SSA uses to manage OASDI overpayment collections.

SSA uses the Manual Adjustment, Credit, and Award Data Entry system (MACADE) to update overpayment information on ROAR. SSA established an interface between ROAR and the Supplemental Security Record⁴ (SSR) to apply collections made from OASDI benefits toward SSI overpayments. Each time SSA makes a collection from an individual's OASDI benefits, the system records a reduction in the debt balance on ROAR. The interface between ROAR and the SSR also reduces the total remaining SSI debt balance.

However, some MACADE inputs reduce ROAR overpayment balances even when SSA did not actually collect any funds from the individual. The system does not distinguish these reductions from actual collections, and the interface can erroneously reduce overpayment balances on the SSR. Left uncorrected, these MACADE inputs create financial losses because the overpayments are erroneously written off.

¹ *Social Security Act* §§ 201 and 1601.42 U.S.C. §§ 401 and 1381.

² Individuals may not be responsible for repaying an overpayment if the person was without fault in causing the overpayment, and recovery would either defeat the purpose of the *Social Security Act* or be against equity and good conscience. SSA, *POMS, GN-General*, ch. GN 022, subch. GN 02250.001 (October 4, 2005). SSA, *POMS, SI-Supplemental Security Income*, ch. SI 022, subch. SI 02260.001, sec. A (January 30, 2017).

³ 20 C.F.R. § 416.572 (a) (2005). SSA, *POMS, SI-Supplemental Security Income*, ch. SI 022, subch. SI 02220.020, (April 1, 2014).

⁴ The SSR maintains all data related to an SSI recipient's initial claim and post-eligibility determinations, including a recipient's SSI overpayment balance.

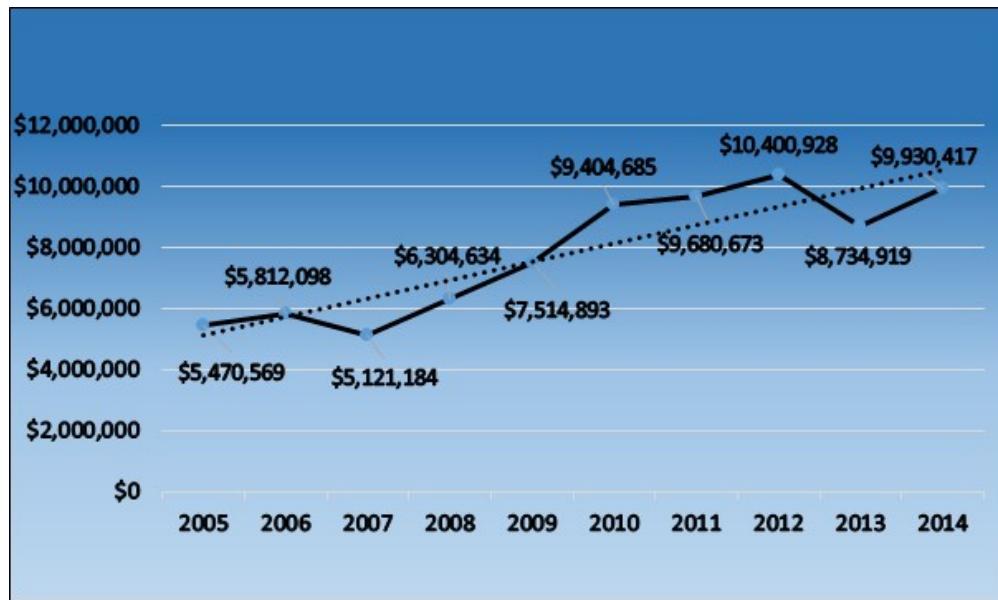
To avoid such financial losses, SSA policy generally prohibits personnel from using MACADE to adjust SSI debt on ROAR and requires that employees use a different method to make these adjustments. For information on our scope and methodology, see Appendix A.

RESULTS OF REVIEW

Use of MACADE to adjust cross-program recovery overpayments erroneously reduced SSI overpayments that SSA was collecting from concurrent beneficiaries' OASDI benefits. Although SSA generally prohibited personnel from using MACADE to process these transactions, SSA did not implement system controls to prevent employees from inputting the transactions. Also, SSA issued contradictory guidance making it unclear whether employees should use MACADE to process the inputs.

From January 2005 through March 2015, SSA processed 14,248 MACADE adjustments of \$1,000 or more that reduced overpayments on the SSR by approximately \$80 million.

**Figure 1: SSR Overpayment Balances Reduced by MACADE Adjustments
2005 Through 2014**



We randomly selected and reviewed 100 of these transactions and determined that 92 adjustments⁵ erroneously reduced overpayments by approximately \$483,000.

⁵ Although use of MACADE was not appropriate in the other eight instances, available documentation indicated the adjustment related to receipt of actual payments from the recipients. Therefore, corresponding reductions to the SSI debts on these SSRs were appropriate.

Based on our sample results, we estimate that, from January 2005 through March 2015, SSA erroneously reduced SSI overpayments by approximately \$58.1 million.⁶ Absent corrective action, we estimate these processing errors will erroneously reduce SSI overpayments by approximately \$7 million over the next 12 months. See Appendix B for a summary of our sampling methodology and results.

MACADE Inputs Erroneously Reduced SSI Overpayments

Table 1 illustrates several general types of MACADE inputs that erroneously reduced SSI overpayments.

Table 1: Sample Transactions Involving Erroneous Reduction of SSI Overpayments

Input Type	Number of Erroneous Reductions	Amounts Erroneously Reduced
Establish Collection Rate	44	\$274,232
Delete Overpayment	15	58,341
Stop Partial Recovery	14	64,695
Reduce Overpayment Balance	6	22,729
Other	6	23,287
Unknown ⁷	7	39,693
Total	92	\$482,977

Establish Collection Rate

In 44 cases, use of MACADE to input monthly overpayment collection rates and collection periods on ROAR erroneously reduced SSI overpayment balances on the SSR. In 41 of these cases, collection rates input were insufficient to collect overpayment balances before the end of 2049.⁸ In these cases, SSA systems not only reduced the overpayment balances on ROAR to equal the amount expected to be collected through 2049, but also erroneously reduced corresponding overpayment balances on the SSR. In August 2012, SSA developed special

⁶ SSA employees subsequently identified and corrected 14 of the 92 erroneous reductions by restoring the overpayment balances on the beneficiaries' payment records. We excluded these overpayments when we computed the \$58.1-million estimate.

⁷ For these seven transactions, MACADE input documentation was not available in SSA's Paperless Read Only Query System. SSA processed the inputs between April 2005 and February 2012. Office of Operations staff stated that SSA subsequently enhanced the Paperless system to improve long-term document retention.

⁸ ROAR was not programmed to allow for collection of overpayments beyond Calendar Year 2049. When SSA agrees to monthly collection rates that require the overpayment collection period to extend beyond 2049, SSA personnel must identify the amount that will go uncollected through 2049, and establish an alert that will remind employees to re-establish the uncollected debt in 2050.

procedures to prevent these errors. However, SSA employees did not always follow the special procedures.

To illustrate, SSA overpaid an SSI recipient \$30,109 because the recipient failed to report periods of extended absences from the United States. When the recipient subsequently began receiving OASDI benefits, SSA initiated cross-program recovery. SSA added the unpaid overpayment balance on ROAR in December 2013 and approved the individual's request to withhold \$24 per month. Based on the low collection rate, SSA would collect only \$10,320 through 2049 and would not collect the remaining \$19,789 until after 2049. An SSA employee used MACADE to input the \$24 per month collection rate through 2049. SSA systems not only automatically reduced the overpayment balance on ROAR by \$19,789, but also erroneously reduced the corresponding overpayment balance on the SSR by \$19,789.

In the three remaining cases, SSA employees used MACADE to input collection rates and/or collection periods that resulted in less than full overpayment collection. SSA systems not only automatically reduced the overpayments on ROAR to the smaller amounts, but also erroneously reduced the corresponding overpayment balances on the SSR.

Delete Overpayment

In 15 cases, use of MACADE to delete cross-program recovery overpayments erroneously reduced the corresponding overpayment balances on the SSR. Further, when SSA employees use this type of MACADE input, they cannot select individual overpayments for deletion. Therefore, in sample cases where individuals had multiple overpayments on ROAR, the MACADE input deleted them all.

For example, SSA overpaid an SSI recipient \$9,642 because the recipient failed to report wages. The recipient subsequently became entitled to OASDI benefits, causing his SSI eligibility to terminate. SSA initiated cross-program recovery on the unpaid SSI overpayment balance. SSA subsequently learned the individual had been confined to a correctional institution, which resulted in establishment of an additional \$1,903 overpayment on ROAR. SSA later determined the prison-related overpayment was invalid, and an SSA employee used MACADE to delete the \$1,903 overpayment. At the time, the unpaid SSI debt on ROAR was \$5,901. The MACADE input not only deleted both the \$1,903 and the \$5,901 overpayments on ROAR, but also erroneously reduced the \$5,901 overpayment balance on the SSR to \$0.

Stop Partial Recovery

In 14 cases, use of MACADE to stop partial recovery of SSI overpayments on ROAR erroneously reduced corresponding overpayment balances on the SSR. For example, SSA overpaid a concurrent beneficiary \$10,354 in SSI because the beneficiary failed to report workers' compensation income and receipt of a cash settlement, which also made the individual ineligible for SSI. SSA began collecting this overpayment from the individual's OASDI benefits at a partial recovery rate of \$28 per month. The individual later regained SSI eligibility, at which time, SSA stopped cross-program recovery to reinitiate collection from the individual's SSI payments. When an SSA employee used MACADE to stop partial recovery from the

individual's OASDI benefits, the system not only removed the \$8,427 unpaid balance on ROAR, but also erroneously reduced the overpayment balance on the SSR by \$8,427.

Reduce Overpayment Balance

In six cases, use of MACADE to reduce overpayment balances on ROAR erroneously reduced the corresponding overpayment balances on the SSR. For example, SSA overpaid a concurrent beneficiary \$3,909 in SSI and established the overpayment on ROAR for cross-program recovery. SSA subsequently determined the individual had been overpaid \$12,227 in OASDI benefits and added that amount on ROAR for collection. SSA policy prohibits collection of an SSI overpayment from an individual's OASDI benefits if SSA is also collecting an OASDI overpayment from those benefits.⁹ To prevent collection on the \$3,909 SSI overpayment, an SSA employee used MACADE to reduce the \$3,909 ROAR overpayment balance to \$0. The MACADE input not only stopped cross-program recovery on the SSI overpayment, but also erroneously reduced the overpayment balance on the SSR by \$3,909.

Other and Unknown Input Types

In 13 cases, SSA employees used MACADE to adjust overpayment balances on ROAR for unspecified or other reasons. Each transaction erroneously reduced corresponding overpayment balances on the SSR.

Systems and Policy Considerations

SSA Office of Systems staff stated that the programmers who coded the system had retired so it was unclear why MACADE inputs caused the system to erroneously reduce overpayment balances on the SSR. Staff speculated that programmers might have been uncertain about whether MACADE adjustments represented actual overpayment collections, so they coded the transactions to automatically reduce overpayment balances on the SSR to avoid financially disadvantaging beneficiaries.

Systems staff stated that reprogramming the system to prevent MACADE adjustments from automatically reducing SSI overpayment balances is possible, but further analysis would be required. Absent computer programming changes, SSA instructs employees to use another program to process these changes. However, SSA also instructs employees to use MACADE to process adjustments to cross-program recovery overpayments in certain circumstances—if they follow special procedures to prevent erroneous overpayment reduction. Further, SSA policy instructed employees to use MACADE for “stop partial recovery” inputs; however, these inputs were the third leading cause of errors in our sample.

⁹ SSA, *POMS, SI-Supplemental Security Income*, ch. SI 022, subch. SI 02220.020, sec. A.2.f (April 1, 2014).

SSA had also issued multiple policy reminders on processing changes to cross-program recovery cases.¹⁰ In addition, SSA had issued reminders about proper case handling for SSI cross-program recovery overpayments affected by the 2049 systems limitation.¹¹ Despite these reminders, the dollar amount of overpayments erroneously reduced by MACADE transactions was trending upward.

CONCLUSIONS

From January 2005 through March 2015, we estimate that SSA's use of MACADE to adjust cross-program recovery overpayments caused the erroneous reduction of approximately \$58.1 million in SSI debt owed by concurrent beneficiaries. Absent corrective action, we estimate these errors will result in the erroneous reduction of approximately \$7 million in additional SSI overpayments over the next 12 months.

SSA was aware that using MACADE to process these adjustments could erroneously reduce the SSI overpayments, but it had not implemented systems controls to prevent employees from making these adjustments. Further, SSA issued contradictory guidance to employees that did not make it clear it was inappropriate to use MACADE to process the adjustments.

RECOMMENDATIONS

We recommend SSA:

1. Consider the cost-effectiveness of implementing controls to prevent systems from erroneously reducing SSI overpayments.
2. Update policy and training materials to be clear and consistent on the use of MACADE to input cross-program recovery adjustments.
3. Consider the cost-effectiveness of identifying and re-establishing SSI overpayments erroneously reduced by MACADE adjustments.

¹⁰ Examples include Administrative Message 14086, *Cross-Program Recovery (CPR) Overpayment Processing Reminders* (November 24, 2014), and Technical and Systems Information Reminder i789, *Cross-Program Recovery (CPR) Overpayment Processing Reminders* (December 3, 2014).

¹¹ Examples include Office of Central Operations Bulletin 08-0113, *Cross Program Recovery Exceptions* (March 18, 2008), and Southeastern Program Service Center Operations Bulletin 14-081, *Data Exchange for MBR/ROAR/SSR, Including CPR Past 2049* (May 21, 2014).

AGENCY COMMENTS

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

A handwritten signature in black ink, appearing to read "Rona Lawson".

Rona Lawson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed applicable sections of the *Social Security Act*, Federal regulations, and Social Security Administration (SSA) policies and procedures.
- Obtained data from the Recovery of Overpayments, Accounting and Reporting system identifying 14,248 Manual Adjustment, Credit, and Award Data Entry system inputs totaling \$80,162,715 that (1) SSA processed from January 2005 through March 2015, (2) reduced cross-program recovery overpayment balances (type of event Title XVI cross recovery program, transaction code 22, search sort code B) by \$1,000 or more, and (3) reduced overpayment balances appearing on the Supplemental Security Record (SSR).
 - We randomly selected 100 transactions for review. For each transaction, we
 - reviewed SSA mainframe and Intranet queries for each sampled transaction;
 - obtained information from SSA about system functionality relating to the transaction reviewed;
 - determined the validity of the overpayment reduction, and
 - quantified the erroneously reduced overpayments.

We conducted our audit from July 2016 to February 2017 in Dallas, Texas, and Denver, Colorado. We determined the data used for this audit were sufficiently reliable to meet our audit objective. The primary entities audited were the Offices of the Deputy Commissioners for Operations and Systems. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix B – SAMPLING METHODOLOGY AND RESULTS

We obtained data from the Recovery of Overpayments, Accounting and Reporting system identifying 14,248 Manual Adjustment, Credit, and Award Data Entry system inputs totaling \$80,162,715 that (1) the Social Security Administration (SSA) processed from January 2005 through March 2015, (2) reduced cross-program recovery overpayment balances (type of event Title XVI cross program recovery, transaction code 22, search sort code B) by \$1,000 or more, and (3) reduced overpayment balances appearing on the Supplemental Security Record (SSR).

We randomly selected and reviewed 100 transactions and determined 92 resulted in erroneous overpayment reductions on the SSR totaling \$482,978. SSA records indicated that SSA employees subsequently corrected 14 of the erroneous transactions and reinstated overpayments totaling \$74,787, leaving the remaining \$408,191 in errors uncorrected.

Based on our sample results, we estimate that, from January 2005 through March 2015, SSA erroneously reduced Supplemental Security Income (SSI) overpayments by \$58,159,028, and did not subsequently identify and correct these errors. The following tables provide the details of our sample results and statistical projections.

Table B–1: Population and Sample Size

Description	Transactions
Population Size	14,248
Sample Size	100

Table B–2: Uncorrected Erroneously Reduced Overpayments

Description	Amount
Sample Results	\$408,191
Point Estimate	58,159,028
Projection – Lower Limit	44,578,824
Projection – Upper Limit	71,739,232

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

We also estimated that SSA will erroneously reduce SSI overpayments by an additional \$7,029,192 over the next 12 months if corrective actions are not taken. We based the computation on the average annual SSI overpayments reduced by MACADE adjustments in the 3 most recent years (\$9,688,755) multiplied by the percent of erroneously reduced overpayments that remained uncorrected (72.55 percent).

Table B–3: Estimated Uncorrected Erroneously Reduced Overpayments over Next 12 Months

Description	Amount
Average SSI Overpayments Reduced by MACADE Adjustments - Years 2012-2014 (\$10,400,928+\$8,734,919+\$9,930,417) / 3	\$9,688,755
Total Estimated Uncorrected Erroneous Reductions / Total Erroneous Reductions \$58,159,028 / \$80,162,715	72.55%
Estimated Uncorrected Erroneous Reductions in Next 12 Months	\$7,029,192

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: June 23, 2017 Refer To: S1J-3

To: Gale S. Stone
Acting Inspector General

From: Stephanie Hall/s/
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Manually Reduced Cross-program Recovery Overpayments" (A-06-17-50225)--INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,
“MANUALLY REDUCED CROSS-PROGRAM RECOVERY OVERPAYMENTS” (A-06-
17-50225)**

Thank you for the opportunity to comment on the draft report. We take our responsibility to recover overpayments very seriously, and have a strategy in place to improve and enhance our debt recovery efforts. As good stewards of taxpayer funds, and to preserve the public’s trust in our programs, we remain focused on preventing improper payments. Since fiscal year (FY) 2004, we have recovered \$37.63 billion in Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) overpayments. Most recently, in FY 2016, we took action to collect \$3.29 billion in OASDI and SSI overpayments. Below are our responses to the recommendations.

Recommendation 1

Consider the cost-effectiveness of implementing controls to prevent systems from erroneously reducing SSI overpayments.

Response

We agree.

Recommendation 2

Update policy and training materials to be clear and consistent on the use of MACADE to input cross-program recovery adjustments.

Response

We agree.

Recommendation 3

Consider the cost-effectiveness of identifying and re-establishing SSI overpayments erroneously reduced by MACADE adjustments.

Response

We agree.

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