

*Audit Report*

Supplemental Security Income  
Redeterminations Closed by Field  
Office Management

**MEMORANDUM**

**Date:** June 19, 2019 **Refer To:**

**To:** The Commissioner

**From:** Inspector General

**Subject:** Supplemental Security Income Redeterminations Closed by Field Office Management  
(A-06-18-50392)

The attached final report presents the results of the Office of Audit's review. The objectives were to identify instances where field office managers and supervisors closed unusual volumes of Supplemental Security Income redeterminations and determine whether they closed the redeterminations in accordance with Agency policy.

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



Gail S. Ennis

Attachment

# Supplemental Security Income Redeterminations Closed by Field Office Management

## A-06-18-50392



June 2019

Office of Audit Report Summary

### Objectives

To identify instances where field office managers and supervisors closed unusual volumes of Supplemental Security Income (SSI) redeterminations and determine whether they closed the redeterminations in accordance with Agency policy.

### Background

The SSI program provides monthly payments to individuals with limited income and resources who are aged, blind, or disabled. SSA periodically reviews recipients' non-medical eligibility factors—income, resources, and living arrangement—to determine whether the recipient is still eligible for, and receiving, the correct SSI payment. SSA calls these reviews redeterminations.

SSA's systems access policy allows managers and supervisors to close redeterminations. However, we obtained information that a field office manager was closing redeterminations initiated by Claims Specialists before development of recipients' eligibility factors was completed. We confirmed these allegations and shared this information with the appropriate SSA officials. To review this issue further, we obtained data that identified 119,930 SSI redeterminations SSA field office managers and supervisors closed from October 1, 2013 through June 8, 2017.

### Findings

During the period reviewed, 661 managers and 2,091 supervisors closed 119,930 redeterminations—about 1 percent of the approximately 9 million redeterminations SSA completed during the review period. Most managers and supervisors closed fewer than 10 redeterminations. However, 5 managers and 32 supervisors closed 500 or more redeterminations, including 1 manager who closed more than 3,000 redeterminations. SSA has initiated its own review of these cases.

Our review of randomly selected cases indicated that managers and supervisors closed 36 percent of the redeterminations before development of SSI recipients' eligibility factors was completed.

Although SSA's systems access policy allows managers and supervisors to close redeterminations, SSA did not ensure they received SSI technical training and had the SSI program proficiency necessary to effectively complete redeterminations. Closing redeterminations without developing all eligibility factors can result in inaccurate eligibility and payment amount determinations.

We also found that managers and supervisors who improperly closed redeterminations opened by other field office staff did not change employee codes to their own codes before they closed the cases. If these cases were selected for quality review, any deficiencies would be incorrectly attributed to field office staff instead of the managers/supervisors who closed the cases.

### Recommendations

We made five recommendations for corrective action. SSA agreed with four recommendations but did not agree to require managers and supervisors who close redeterminations to update unit codes to accurately attribute redeterminations for quality reviews. The report includes the full text of the Agency's comments as well as our response.

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## **ABBREVIATIONS**

MSSICS	Modernized Supplemental Security Income Claims System
OIG	Office of the Inspector General
POMS	Program Operations Manual System
PQR	Performance Quality Review
SSA	Social Security Administration
SSI	Supplemental Security Income
U.S.C.	United States Code

## OBJECTIVES

Our objectives were to identify instances where field office managers and supervisors closed unusual volumes of Supplemental Security Income (SSI) redeterminations and determine whether they closed the redeterminations in accordance with Agency policy.

## BACKGROUND

SSA administers the SSI program under Title XVI of the *Social Security Act*.<sup>1</sup> The SSI program provides monthly payments to people with limited income and resources who are aged, blind, or disabled. Individuals must have income and resources below specified levels to be eligible for payments. SSA periodically reviews recipients' non-medical eligibility factors—income, resources, and living arrangements—to determine whether the recipient is still eligible for, and receiving, the correct payment.<sup>2</sup> SSA calls these reviews redeterminations.

The Agency considers SSI redeterminations a high priority and one of its most effective payment recapture activities because they identify cases where SSA should reduce or discontinue benefits. SSA estimated that redeterminations completed in Fiscal Year 2014 identified an average overpayment of \$1,503 and an average underpayment of \$537.<sup>3</sup> SSA increased its annual SSI redetermination goal from approximately 1 million in Fiscal Year 2007 to approximately 2.6 million in Fiscal Year 2018. Progress toward meeting the annual goal is tracked weekly, and SSA managers' and supervisors' performance reviews and monetary awards are tied to achieving Agency goals.

Each year, SSA uses a profiling system to determine the likelihood of a change in a recipient's income, resource, and/or living arrangement circumstances that would result in an over- or underpayment. Based on this and other factors, SSA selects recipients for redetermination. Field office personnel notify recipients that they have been selected and typically schedule in-person or telephone interviews to complete the redeterminations. Field office employees may also become aware of changes in circumstances and initiate redeterminations while conducting unrelated business with recipients. During this process, field office employees open redetermination "events" in the Modernized Supplemental Security Income Claims System (MSSICS)<sup>4</sup> and obtain information pertaining to the recipients' income, resources, and living arrangements. SSA generally provides recipients 30 days to submit the required proof of these eligibility factors but can grant extensions under appropriate circumstances.

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<sup>1</sup> *Social Security Act*, 42 U.S.C. § 1381 (govinfo.gov 2018).

<sup>2</sup> SSA, *POMS*, SI 02305.001, A (August 29, 2014).

<sup>3</sup> SSA, Office of Budget, Finance, Quality and Management, *Supplemental Security Income Redeterminations Change Rate Study Fiscal Year 2014*, app. B, p. 1 (January 2015).

<sup>4</sup> MSSICS is the primary data collection and processing system for the SSI program and maintains a permanent record of SSI claimants' applications and subsequent transactions with SSA.

Field office employees verify recipients' income, resources, and living arrangements for each month in the review period; apply any appropriate exclusions; and input verified information in MSSICS. Once eligibility factor development is complete, the employee closes the redetermination. MSSICS then transmits redetermination data to the Supplemental Security Record, which results in any applicable changes to SSI eligibility or payment amounts.

Evaluating eligibility and payment levels for the SSI program is complex because of the different rules that govern it. For example, a payment amount can fluctuate monthly depending on a recipient's income, resources, and living arrangements. During a redetermination, SSA must estimate eligibility and payment amounts prospectively and redetermine them retroactively, for up to 24 months.<sup>5</sup> SSA Claims Specialists receive extensive training in determining SSI eligibility and payment amounts and conduct the vast majority of SSI redeterminations.

SSA systems access policy allows managers and supervisors to close redeterminations. SSA's Office of Operations provided reasons why field office management might close redeterminations, including (1) management who had completed SSI program training might have worked these cases to avoid missing deadlines when Claims Specialists were absent; (2) missing evidence became available for pending redeterminations, and the Claims Specialist was busy with other workloads; or (3) in offices with limited staffing and resources, managers often had to help process work, especially if staff were busy with reception duties or taking claims.

However, we obtained information that indicated a field office manager was closing redeterminations initiated by Claims Specialists before development of recipients' eligibility factors was completed. After confirming these allegations and determining the manager closed a high volume of redeterminations compared to other managers, we shared this information with the appropriate SSA officials. To further review this issue, we obtained data that identified 119,930 SSI redeterminations closed by SSA field office managers and supervisors from October 1, 2013 through June 8, 2017. See Appendix A for additional information on our scope and methodology.

## RESULTS OF REVIEW

During the period reviewed, 661 managers and 2,091 supervisors closed a total of 119,930 redeterminations. These redeterminations represent about 1 percent of the approximately 9 million redeterminations SSA completed during the review period. Most managers and supervisors closed fewer than 10 redeterminations.<sup>6</sup> However, 5 managers and 32 supervisors closed 500 or more redeterminations, including 1 manager who closed more than 3,000 redeterminations. SSA has initiated its own review of these cases.

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<sup>5</sup> SSA, POMS, SI 02305.034, B (June 29, 2017).

<sup>6</sup> During our review period, the median number of redeterminations closed by managers and supervisors was five and nine, respectively.

Our review of randomly selected cases indicated managers and supervisors closed 36 percent of the redeterminations before development of SSI recipients' eligibility factors was completed. See Appendix B for a summary of our sample methodology and results.

Although SSA's systems access policy allows managers and supervisors to close redeterminations, SSA did not ensure managers and supervisors received SSI technical training and had the SSI program proficiency necessary to effectively complete redeterminations. Closing redeterminations without developing all eligibility factors can result in inaccurate eligibility and payment amount determinations.

We also found that managers and supervisors who improperly closed redeterminations opened by other field office staff did not change employee codes to their own codes before they closed the cases. If these cases were selected for quality review, any deficiencies would be incorrectly attributed to field office staff instead of the managers/supervisors who actually closed the cases.

## Volume Redeterminations Closed by Managers and Supervisors

SSA workload statistics indicated the average time to complete a redetermination was 126 minutes. While most managers and supervisors closed fewer than 10 redeterminations during the review period, some closed relatively higher numbers of redeterminations.

- Five managers and 32 supervisors closed more than 500 redeterminations during the review period, including 1 manager who closed 3,129 redeterminations and 1 supervisor who closed 2,916 redeterminations.
- Forty-three managers and 228 supervisors closed 30 or more redeterminations in at least 1 calendar month.
  - Fourteen managers and 54 supervisors closed 30 or more redeterminations in a single day, including 1 manager who closed 86 redeterminations in 1 day and 1 supervisor who closed 238 redeterminations in 1 day.
  - Two managers and 3 supervisors closed 30 or more redeterminations in a single day at least 12 different times.

SSA's systems access policy allows managers and supervisors to close redeterminations, and there may be good reasons why field office management might close some redeterminations, such as when Claims Specialists were absent or busy with other workloads. While such situations could explain why managers and supervisors periodically closed some redeterminations, it did not explain instances where they closed high volumes of redeterminations relative to other managers and supervisors. High volume redetermination closure could indicate managers and supervisors closed cases before eligibility factor development was completed.

We provided SSA the number of redeterminations closed by managers and supervisors during the review period. SSA subsequently identified to its Regional Offices the managers and supervisors who closed (1) 1,000 or more redeterminations or (2) more than 30 redeterminations in a single day.

## **Redeterminations Closed Without Eligibility Factor Development**

We randomly selected and reviewed 100 redeterminations (50 closed by managers and 50 closed by supervisors) closed during the last 5 months of the review period (see Appendix B for our sampling methodology and results). In 36 cases, managers (18 cases) and supervisors (18 cases) closed the redeterminations before development of the SSI recipients' eligibility factors was completed.

SSA had some systems controls in place that alerted employees to complete eligibility factor development, but those controls did not prevent employees from closing redeterminations before development was completed. Illustrations follow.

- A manager closed a redetermination without correctly developing the recipient's bank account balance. As a result of this error, SSA suspended the recipient's SSI payments and established a \$1,412 overpayment. Field office staff subsequently identified and corrected the manager's error, reinstated the recipient's SSI payments, and reversed the erroneous overpayment.
- A manager closed a redetermination before proof of a recipient's wages was received and entered into the system. Closing the redetermination without verifying this eligibility factor resulted in the erroneous assessment of a \$385 overpayment against the recipient. Field office staff subsequently identified and corrected the manager's error and reversed the erroneous overpayment.

SSA stated the Office of Systems had worked with various components to develop existing controls based on evaluations of feasibility and cost-effectiveness. Because of the quantity, variability, and technical exceptions that apply to development items handled during a redetermination, SSA stated it was not feasible or cost-effective to implement system controls that would prevent redetermination closure because of missing or incomplete development items. Consequently, it is important that SSA employees who complete redeterminations have the technical knowledge and competence necessary to perform that work.

Managers and supervisors typically oversee the activities of trained specialists who handle the daily transactions in SSA field offices. However, managers and supervisors may not have received the SSI technical training necessary to effectively complete redeterminations. SSA officials acknowledged that completion of this training depended on the program in which management officials specialized when they were Claims Specialists, and SSA did not verify that managers and supervisors who closed redeterminations had received SSI technical training and had the SSI program proficiency necessary to effectively complete redeterminations.

Closing redeterminations without verifying recipients' income, resources, and/or living arrangements or applying the appropriate policies can result in inaccurate eligibility and payment amount determinations. It can also increase costs of administering the program because of increased traffic and transactions in field offices to correct the errors.

We provided SSA our analysis of all 100 sample cases. SSA stated it will send the 36 error cases to the applicable field offices for corrective action.

## Closure of Redeterminations Initiated by Other Employees

In May 2018, SSA implemented Performance Quality Reviews (PQR) in which Claims Technical Experts review various completed SSA workloads, including redeterminations. These quality reviews are considered in Claims Specialists' annual performance reviews, which can affect awards and promotions. SSA selects PQR cases for review based on the unit code<sup>7</sup> on the record when the redetermination was closed.

In 29 of the 50 randomly selected redeterminations closed by managers and 32 of the 50 randomly selected redeterminations closed by supervisors, the redeterminations had been initiated by other employees. Managers and supervisors closed 23 of these 61 cases without completing all required development. However, these managers and supervisors did not change the employee unit code to their own unit code on any of the 23 improperly closed cases.

If selected for PQR, it would incorrectly appear the 23 redeterminations were closed by the Claims Specialists whose unit codes were on the record when the redeterminations were initiated. Therefore, any PQR deficiencies for these cases would be attributed to Claims Specialists, not the managers or supervisors who actually closed the cases. As a result, Claims Specialists' annual performance reviews could be negatively affected by managers and supervisors who closed these redeterminations without completing development of the SSI recipients' underlying eligibility factors.

## Systems Access Policies

SSA officials stated there were additional legitimate business reasons for field office management to process redeterminations. Officials stated that position descriptions for managers and supervisors require that they provide administrative and managerial oversight/assistance to a number of employees in one or more offices. To provide oversight or assistance, managers and supervisors must have access to the same systems as their employees. Officials also stated that supervisors were required to review and approve critical cases and other cases designated for special handling where regular procedures are ineffective, and that some redeterminations require this special handling. Finally, officials stated that many rural offices had only a manager on site, and, in these offices, managers perform all management functions.

SSA is reviewing the high volume and error cases previously discussed to determine whether further action is warranted. However, officials stated SSA did not plan to change its systems access policies and will continue allowing managers and supervisors to open and close redeterminations.

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<sup>7</sup> A unit code consists of a combination of letters and/or numbers that can identify the specific type of workload being processed, as well as a unique three-digit code that identifies the responsible SSA employee.

## **CONCLUSIONS**

After confirming that a field office manager was closing redeterminations initiated by Claims Specialists before development of recipients' eligibility factors was completed, we obtained data that identified 119,930 SSI redeterminations closed by SSA field office managers and supervisors from October 1, 2013 through June 8, 2017. These redeterminations represented about 1 percent of the approximately 9 million redeterminations that SSA completed during that period. We identified a small number of managers and supervisors who closed a relatively high number of redeterminations. SSA has initiated its own review of these cases.

Our review of randomly selected cases indicated that managers and supervisors closed 36 percent of the redeterminations before development of SSI recipients' eligibility factors was completed. Although SSA systems access policy allows managers and supervisors to close redeterminations, SSA did not ensure managers and supervisors received SSI technical training and had the SSI program proficiency necessary to effectively complete redeterminations. Closing redeterminations without developing all eligibility factors can result in inaccurate eligibility and payment amount determinations.

We also found that managers and supervisors who improperly closed redeterminations opened by other field office staff did not change employee codes to their own codes before closing the cases. As a result, if these cases were selected for quality review, any deficiencies would be incorrectly attributed to field office staff instead of the managers or supervisors who actually closed the cases.

## **RECOMMENDATIONS**

We recommend that SSA:

1. Complete its review of redetermination activity for managers and supervisors who closed high volumes of redeterminations.
2. Complete corrective action in accordance with policy for the 36 cases identified by our audit.
3. Ensure managers and supervisors who close redeterminations complete sufficient training and have the SSI program proficiency necessary to effectively complete redeterminations.
4. Require managers and supervisors who close redeterminations to update unit codes to accurately attribute redeterminations for quality reviews.
5. Establish a process to periodically identify and review instances where managers or supervisors close high numbers of redeterminations relative to their peers.

## **AGENCY COMMENTS**

SSA agreed with Recommendations 1, 2, 3, and 5 but disagreed with Recommendation 4. SSA stated it holds responsible employees and/or management officials accountable for redetermination errors. The full text of SSA's comments is included in Appendix C.

## **OIG RESPONSE**

A PQR reviewer can only hold a responsible employee or management official accountable for redetermination errors when SSA systems identify the responsible individual. Our specific concern is with managers and supervisors who close redeterminations before eligibility factor development is complete and without making any changes in MSSICS. In these cases, manager or supervisor involvement is not recorded in MSSICS, which could lead to a PQR reviewer holding the wrong person accountable for the errors.

SSA officials advised us that a Claims Specialist who believes a PQR error was misattributed can request the Audit Trail System be used to identify the individual who closed the redetermination. However, SSA officials acknowledged that employees are not informed of this option. Because PQR is a newly implemented process and we did not determine whether PQR reviewers improperly attributed redetermination errors, we are closing Recommendation 4 and may evaluate the PQR process as part of a future audit.



Rona Lawson  
Assistant Inspector General for Audit

# *APPENDICES*

## **Appendix A – SCOPE AND METHODOLOGY**

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To accomplish our objective, we:

- Reviewed applicable sections of the *Social Security Act*, Federal regulations, and the Social Security Administration's (SSA) policies and procedures.
- Reviewed prior Office of the Inspector General reports.
- Obtained information from SSA program officials.
- Obtained data that identified 119,930 Supplemental Security Income (SSI) redeterminations closed by SSA field office managers and supervisors from October 1, 2013 through June 8, 2017. For these transactions, we determined the
  - total number of redeterminations closed by each group—managers and supervisors;
  - total number of redeterminations each manager and supervisor closed and how many managers and supervisors closed 500 or more redeterminations; and
  - highest number of redeterminations closed in a single day and month for each manager and supervisor and how many managers and supervisors closed 30 or more redeterminations in a single day and month.
- From January 9, through June 8, 2017 (the last 5 months of the review period) we determined managers closed 2,553 SSI redeterminations and supervisors closed 11,925 SSI redeterminations. From this population, we randomly selected 50 redeterminations closed by managers and 50 redeterminations closed by supervisors. For each transaction, we:
  - Determined how many had been initiated by an employee then subsequently closed by a manager or supervisor.
  - Determined how many had been both initiated and closed by a manager or supervisor. For these cases, we determined whether the Visitor Intake Processing System contained a record of contact with the SSI recipient and whether the redeterminations were opened and closed the same day.
  - Determined how many were closed without developing all eligibility factors and/or correctly applying SSI policies.
  - Determined whether managers and supervisors changed unit codes on cases they closed that were (1) initiated by other employees and (2) closed without completion of all required development.

- Reviewed SSA's Modernized Supplemental Security Income Claims System, Supplemental Security Record, Online Retrieval System, Claims File Records Management System, and eView as well as other SSA systems to determine whether the redetermination was closed without all required verification of recipients' income, resources, and/or living arrangements and whether the proper policies were applied.

We conducted our audit from April to November 2018 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**

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From October 1, 2013 through June 8, 2017, SSA managers closed 22,839 redeterminations, and SSA supervisors closed 97,091 redeterminations. SSA had some systems controls in place that alerted employees to complete eligibility factor development. However, SSA systems did not prevent employees from closing redeterminations before development was completed. In cases where SSA closed redeterminations before eligibility factor development was completed, SSA employees could subsequently obtain information and make system inputs that effectively completed the required eligibility factor development. After making these inputs, it would no longer be apparent the redetermination had been closed before full development. Therefore, to determine whether managers and supervisors closed redeterminations in accordance with Agency policy, we reviewed redeterminations closed in the most recent 5-month period, January 9, through June 8, 2017. During this period, managers closed 2,553 redeterminations, and supervisors closed 11,925 redeterminations.

We randomly selected 50 redeterminations closed by managers and 50 closed by supervisors and reviewed each to determine whether all eligibility factors were developed before closure.

**Table B-1: Sample Results – Redeterminations Closed by Managers**

Description	Amounts
Records in Population	2,553
Sample Size	50
Records Closed Before Eligibility Factor Development Completed	18
Sample Error Rate	36%

**Table B-2: Sample Results – Redeterminations Closed by Supervisors**

Description	Amounts
Total Records in Population	11,925
Sample Size	50
Records Closed Before Eligibility Factor Development Completed	18
Sample Error Rate	36%

## **Appendix C – AGENCY COMMENTS**

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### **SOCIAL SECURITY**

#### **MEMORANDUM**

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

To: Gail S. Ennis  
Inspector General  
*Stephanie Hall*

From: Stephanie Hall  
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report “Supplemental Security Income Redeterminations Closed by Field Office Management” (A-06-18-50392) -- 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 Trae Sommer at (410) 965-9102.

**SSA COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT “SUPPLEMENTAL SECURITY INCOME REDETERMINATIONS CLOSED BY FIELD OFFICE MANAGEMENT” (A-06-18-50392)**

Our policy allows managers and supervisors to close redeterminations for legitimate business reasons. OIG did identify 5 of 661 managers and 32 of 2,091 supervisors that closed a relatively high number of redeterminations, while most managers and supervisors cleared fewer than 10 redeterminations. We are currently reviewing the instances of high volume clearances and will take appropriate administrative action if we identify any policy violations. We also plan on enforcing a review process across the nation to routinely review management clearances and take corrective action as needed. Below are our responses to the recommendations.

**Recommendation 1**

Complete its review of redetermination activity for managers and supervisors who closed high volumes of redeterminations.

Response

We agree.

**Recommendation 2**

Complete corrective action in accordance with policy for the 36 cases identified by our audit.

Response

We agree.

**Recommendation 3**

Ensure managers and supervisors who close redeterminations have the SSI program proficiency necessary to effectively complete redeterminations.

Response

We agree.

**Recommendation 4**

Require managers and supervisors who close redeterminations to update unit codes to accurately attribute redeterminations for quality reviews.

Response

We disagree. We attribute redetermination errors to the office, and hold the responsible employee(s) and/or management official accountable.

### **Recommendation 5**

Establish a process to periodically identify and review instances where managers or supervisors close high numbers of redeterminations relative to their peers.

### **Response**

We agree.

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