

Audit Report

Trends in the Social Security
Administration's Conference
Expenditures

A-05-16-50230 / May 2017

MEMORANDUM

Date: May 26, 2017 **Refer To:**
To: The Commissioner
From: Acting Inspector General
Subject: Trends in the Social Security Administration's Conference Expenditures (A-05-16-50230)

The attached final report presents the results of the Office of Audit's review. The objectives were to review the Agency's (1) compliance with Federal conference reporting requirements and (2) trends in its internal and external conference expenditure reporting.

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

Trends in the Social Security Administration's Conference Expenditures

A-05-16-50230



May 2017

Office of Audit Report Summary

Objectives

To review the Agency's
(1) compliance with Federal
conference reporting requirements and
(2) trends in its internal and external
conference expenditure reporting.

Background

The November 2011 Executive Order 13589, *Promoting Efficient Spending*, and the May 2012 Office of Management and Budget (OMB) Memorandum M-12-12, *Promoting Efficient Spending to Support Agency Operations*, require that Federal agencies exercise discretion and judgment with respect to spending. Agencies must ensure expenses are appropriate, necessary, and managed in a way that minimizes expenses, including spending on conferences.

In accordance with subsequent legislation and OMB guidance, the Social Security Administration (SSA) is required to notify the Office of the Inspector General (OIG) of conferences that cost more than \$20,000 within 15 days of when each is held. SSA must also report detailed expenses annually for conferences that cost more than \$100,000.

Annual reports include a description of each conference's purpose, the number of participants attending, a detailed statement of the costs to the Government, and a description of the contracting procedures used.

Findings

We reviewed documentation for 317 conferences with expenditures over \$20,000 that SSA held in Fiscal Years (FY) 2013 through 2016. The costs of these conferences totaled approximately \$31.9 million. SSA generally complied with Federal conference reporting requirements. However, in FY 2016, SSA did not notify OIG of two conferences with expenditures in excess of \$20,000 within 15 days of the conference dates, as required.

In January 2015, OMB clarified existing guidance on conference reporting. Although this guidance increased the number of SSA conferences that met the requirements for OIG notification in FY 2015, the total expenditures for these conferences decreased. With respect to conferences with expenditures over \$100,000, both the number of conferences and reportable expenditures decreased.

Recommendations

We recommend SSA notify OIG of all conferences with expenditures in excess of \$20,000 within 15 days of the conference dates. If extenuating circumstances prevent OIG notification within 15 days, SSA should notify OIG as soon as it becomes aware of total expenditures.

SSA agreed with the recommendation.

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ABBREVIATIONS

CPAS	Conference Proposal and Approval System
FY	Fiscal Year
DOJ	Department of Justice
MI	Management Information
ODAR	Office of Disability Adjudication and Review
OFPO	Office of Financial Policy and Operations
OIG	Office of the Inspector General
OMB	Office of Management and Budget
Pub. L. No.	Public Law Number
SSA	Social Security Administration

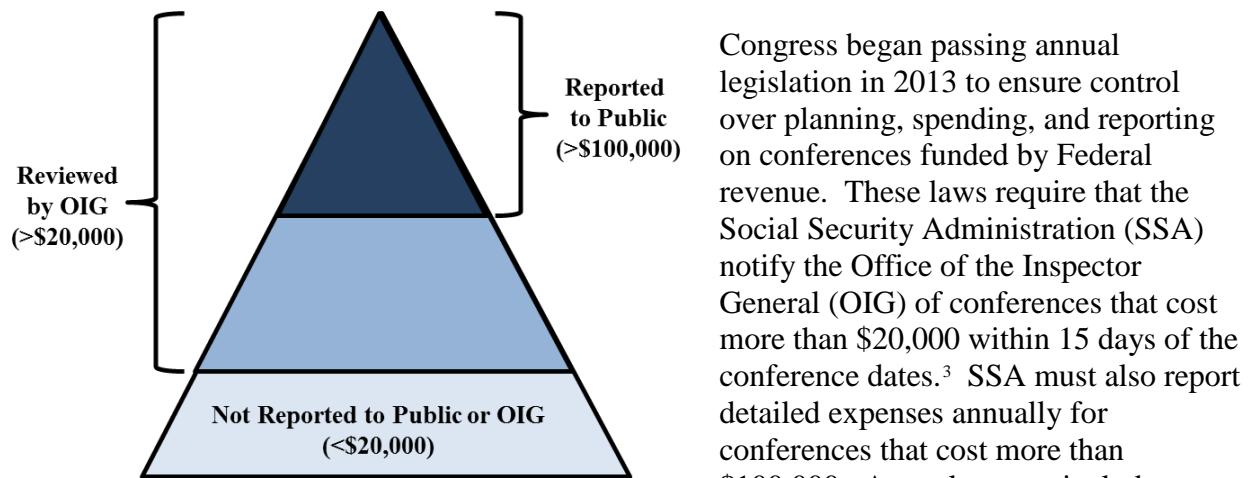
OBJECTIVES

Our objectives were to review the Agency's (1) compliance with Federal conference reporting requirements and (2) trends in its internal and external conference expenditure reporting.

BACKGROUND

In November 2011, the White House issued Executive Order 13589, *Promoting Efficient Spending*,¹ and, in May 2012, the Office of Management and Budget (OMB) issued Memorandum M-12-12, *Promoting Efficient Spending to Support Agency Operations*. In November 2016, OMB issued Memorandum M-17-08, *Amending OMB Memorandum M-12-12, Promoting Efficient Spending to Support Agency Operations*, but it did not change the reporting requirements.² The Executive Order and Memoranda require that Federal agencies exercise discretion and judgment with respect to spending. Agency leaders are required to ensure expenses are appropriate, necessary, and managed in a way that minimizes costs, including spending on conferences.

Figure 1: Conference Reporting Requirements



¹ The White House Office of the Press Secretary, Executive Order 13589, *Promoting Efficient Spending*, (November 9, 2011).

² OMB, M-12-12, *Promoting Efficient Spending to Support Agency Operations*, (May 11, 2012). OMB, M-17-08, *Amending OMB Memorandum M-12-12, Promoting Efficient Spending to Support Agency Operations* (November 25, 2016).

³ *Consolidated and Further Continuing Appropriations Act, 2013*, Pub L. No. 113-6, § 3003, 127 Stat. 198, 435-36 (2013), *Consolidated Appropriations Act, 2014*, Pub. L. No. 113-76, § 742, 128 Stat. 5, 242-43 (2014), *Consolidated and Further Continuing Appropriations Act, 2015*, Pub. L. No. 113-235 § 739, 128 Stat. 2130, 2389-90 (2015), and *Consolidated Appropriations Act, 2016*, Pub. L. No. 114-113 § 535, 129 Stat. 2242, 2331-32 (2016).

statement of the costs to the Government, and a description of the contracting procedures used.⁴ SSA is also required to post a detailed description of conferences with expenses exceeding \$100,000 on its official Website.⁵ These conference-reporting requirements apply to meetings, retreats, seminars, symposiums, or events that involve attendee travel and training activities.⁶

We reviewed SSA's internal management information (MI) in the Conference Proposal and Approval System (CPAS) for conferences held in Fiscal Years (FY) 2013 through 2016 to determine the number of conferences held, expenses per conference and components, attendees, dates held, and purposes.⁷ We consulted information shared with the public in SSA's annual conference expenditures reports. In addition, we met with staff responsible for the conference reporting compliance about annual conference expenditures and policies. Finally, we met with Agency components, as needed, for conference documentation outside what we found available in CPAS. See Appendix A for our scope and methodology.

RESULTS OF REVIEW

We reviewed documentation for 317 conferences with expenditures over \$20,000 that SSA held in FYs 2013 through 2016. The costs of these conferences totaled approximately \$31.9 million. SSA generally complied with Federal conference reporting requirements. However, in FY 2016, SSA did not notify OIG of two conferences with expenditures in excess of \$20,000 within 15 days of the conference dates, as required.

In January 2015, OMB clarified existing guidance on conference reporting. Although this guidance increased the number of SSA conferences that met the requirements for OIG notification in FY 2015, the total expenditures for these conferences decreased. With respect to conferences with expenditures over \$100,000, both the number of conferences and reportable expenditures decreased.

SSA's Conference Reporting Compliance

Of the 317 SSA conferences we reviewed, 65 had costs in excess of \$100,000. For these 317 conferences, SSA generally complied with Federal conference reporting laws.⁸ Specifically, SSA timely provided detailed reports on all conferences with actual expenditures above \$100,000 on its Website and to OIG, in accordance with Federal legislation. Furthermore,

⁴ See note 3.

⁵ OMB, M-12-12, *supra* note 2, at p. 4. The appropriation legislation referenced in note 3 requires compliance with OMB M-12-12 as a condition of appropriated funds availability for conference purposes.

⁶ OMB, M-12-12, *supra* note 2, at p. 3.

⁷ With respect to FY 2013 conference expenditures, we reviewed a prior OIG audit, *Social Security Administration Conference Expenditures in Fiscal Year 2013* (A-05-14-24070), November 2014.

⁸ Our November 2014 review found that SSA generally complied with Federal conference reporting requirements in FY 2013 and recommended that SSA improve controls over conference planning. SSA, OIG, *supra* note 7, at p. 11.

Federal conference reporting laws require that SSA notify OIG of conferences with expenses of more than \$20,000 within 15 days of the conference date. To comply, SSA provided OIG access to CPAS, which allowed OIG to monitor conference proposals and approvals with anticipated expenses of \$20,000 or more.

In FY 2016, SSA did not notify OIG of two conferences with expenditures in excess of \$20,000 within 15 days of the conference date, as required. This occurred because SSA estimated conference expenses below \$20,000 but exceeded that threshold in actual expenditures. Since these conferences had estimated expenses below \$20,000, OIG was not automatically notified.⁹ SSA notified OIG of these conferences over 60 days after each was held—significantly longer than the 15 days required.¹⁰ SSA should ensure OIG is notified of all conferences with expenditures in excess of \$20,000 within 15 days of the conference dates. If extenuating circumstances prevent OIG notification within 15 days, SSA should notify OIG as soon as it becomes aware of total expenditures.

OMB Guidance and Transparency

In January 2015, OMB issued a *Controller Alert* on travel and conference expenditures that clarified policy in four areas, including approval and reporting on events held multiple times in a FY.¹¹ It stated

. . . the [OMB Memorandum] M-12-12 approval and reporting thresholds only apply to a single conference. It does not apply to a conference that occurs multiple times throughout the year. Such conferences should be considered separate events for approval and reporting purposes.¹²

Based on OMB guidance, SSA's internal conference reporting reflected a greater number of single events with lower individual expenses rather than events with multiple occurrences. Although this guidance increased the number of SSA conferences that met the requirements for OIG notification in FY 2015, the total expenditures for these conferences decreased. Overall, SSA's conference expenses reviewed by OIG decreased by 37 percent between FYs 2015 and 2016. For example, in FY 2015, SSA separated 99 conferences that included some multiple event conferences with expenditures above \$20,000 into 153 single events. As a result,

⁹ OIG was not automatically notified of this information because CPAS programming notified OIG only when SSA anticipated expenditures of \$20,000 or more. The Office of Financial Policy and Operations (OFPO) notified OIG afterward, but the notifications were not timely. OFPO is the SSA component responsible for conference reporting.

¹⁰ Spending on these conferences accounted for about \$44,000 of total conference spending in FY 2016.

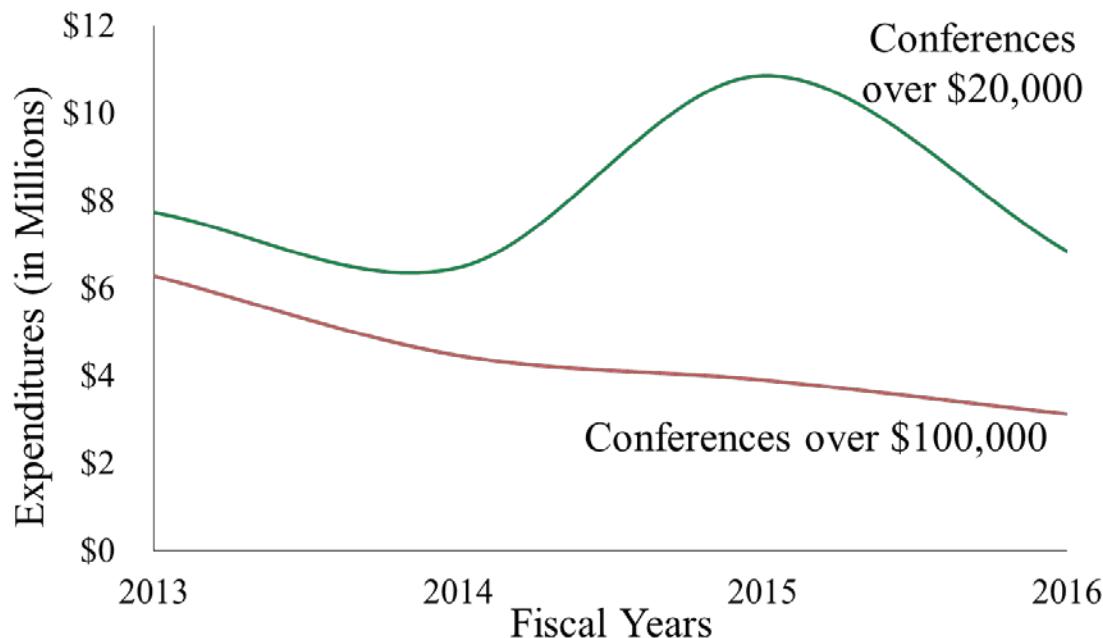
¹¹ *Controller Alerts* are designed to bring attention to emerging financial management issues where OMB believes further action may be warranted but do not constitute official guidance or include specific tasks for agencies beyond consideration of appropriate steps to address the issue. Although OMB authors these alerts, they are publicly available through the Chief Financial Officers Council. OFPO managers stated that since this *Controller Alert* clarified existing guidance, it mandated compliance, and was not optional.

¹² OMB, *Controller Alert: Travel and Conferences*, Controller Alerts, p. 2 (January 15, 2015).

expenditures that met the OIG review threshold decreased from about \$10.9 million to about \$9.2 million.

With respect to publicly reported conferences over \$100,000, the total in FY 2015 decreased from 26 conferences with about \$7.5 million in expenditures to 21 conferences with about \$3.9 million in expenditures. As noted in Figure 2, this change resulted in an increased variance between information available to the public and OIG in FY 2015.

Figure 2: SSA's Internal and External Reporting Trends for FYs 2013 Through 2016



Note: These data include conferences with expenses in excess of \$20,000.

SSA's Conference Reporting Trends

We reviewed the trends in conferences with expenses over \$20,000 and found expenses totaled about \$7.7 million in FY 2013, dropped to about \$6.5 million in FY 2014, and then increased in FY 2015 to almost \$11 million. In FY 2016, the total dropped to about \$6.9 million. During this period, the portion of expenditures meeting the public reporting threshold decreased because of implementation of the aforementioned OMB conference guidance. Table 1 depicts SSA's conference spending for this period.

Table 1: SSA Spending on Conferences in Excess of \$20,000 for FYs 2013 Through 2016

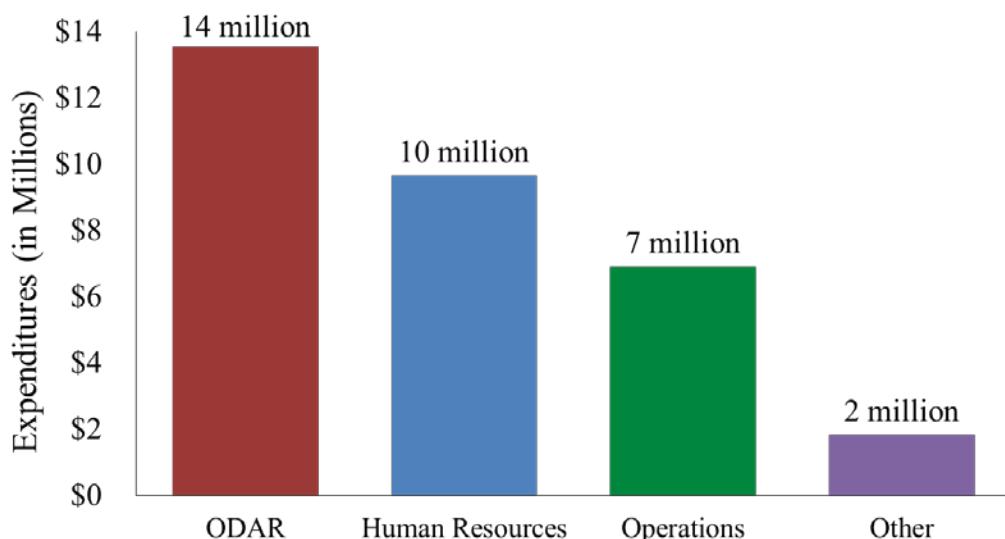
FY	Total Expenditures over \$20,000	Publicly Reported Expenditures over \$100,000	Percentage of Expenditures Reported to the Public
2013	\$7,742,875	\$6,294,132	81 percent
2014	\$6,476,976	\$4,471,565	69 percent
2015 ¹	\$10,863,890	\$3,910,682	36 percent
2016	\$6,853,681	\$3,133,199	46 percent
Total	\$31,937,422	\$17,809,578	56 percent

Note 1: Based on OMB's clarification of existing guidance in January 2015, SSA changed its conference reports to reflect single events rather than conferences with multiple occurrences. As a result, conference expenditures available for OIG review decreased by over \$1.6 million. After this change, FY 2015 conference expenditures at the OIG review threshold totaled about \$9.2 million. Expenditures are rounded.

Conference Costs by Component

The three components responsible for most conference spending in FYs 2013 through 2016 were the Offices of Disability Adjudication and Review (ODAR), Human Resources, and Operations (see Figure 3). Other components with reportable expenses included the Offices of Budget, Finance, Quality, and Management; the Chief Strategic Officer; Communications; General Counsel; Retirement and Disability Policy, and Inspector General.¹³

Figure 3: Total SSA Conference Expenditures by Component in FYs 2013 Through 2016

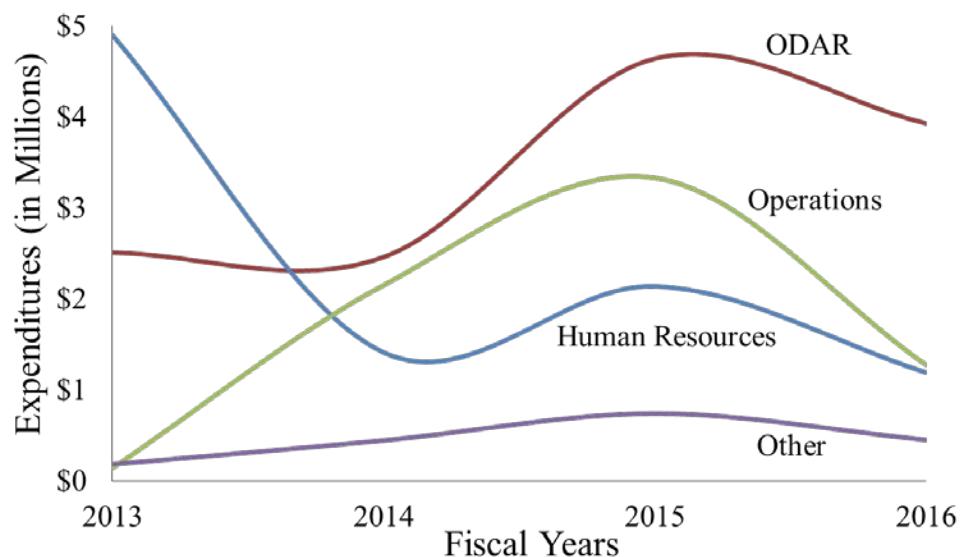


Note: These data include conferences with expenditures in excess of \$20,000. Data labels are rounded.

¹³ For additional information on conference spending by all components for each year, see Appendix B.

As noted in Figure 4, Human Resources, Operations, and ODAR had the highest annual conference expenditures in FYs 2013 through 2016. Human Resources spent the most in FY 2013 because it hosted a large conference related to management training required by SSA's employment contract. This single conference accounted for over \$3.1 million in conference expenditures in FY 2013, and it was not indicative of Human Resources' typical conference spending. ODAR had the highest expenditures in FYs 2014 through 2016. ODAR staff noted that ODAR hired significantly more administrative law judges and support staff in FY 2015 than in the prior 2 years combined and therefore had increased training needs related to hiring.¹⁴ Operations significantly increased spending in FYs 2014 through 2016. We learned from Operations management that the Agency increased spending on technical training for newly hired field office employees nationwide and additional management training.

Figure 4: SSA Conference Spending by Component per Year in FYs 2013 Through 2016



Note: These data include conferences with expenses in excess of \$20,000.

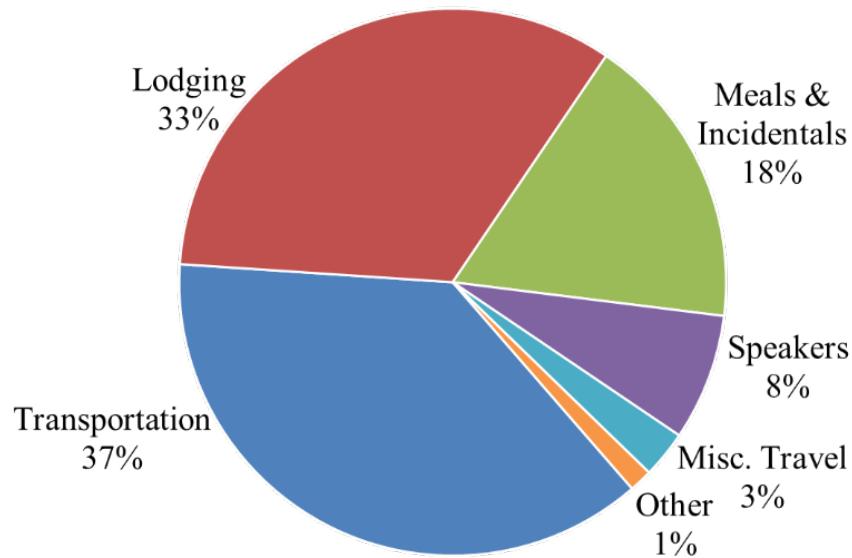
Conference Costs by Expense Type

For FYs 2013 through 2016, the Agency's public reports indicated the majority of expenses related to travel. Similarly, four expense categories tracked by SSA related to travel: transportation, lodging, miscellaneous travel, and meals and incidentals. These types of expenses accounted for 91 percent of conference expenditures. Aside from travel, the Agency spent the most on speaker expenses. SSA spent about \$2.4 million over 4 years on guest speaker fees (about 8 percent of total conference expenditures). Conferences with guest speaker

¹⁴ ODAR hired 27 administrative law judges in FY 2013, 71 in FY 2014, 196 in FY 2015, and 264 in FY 2016.

expenses ranged from \$2,500 to about \$255,000.¹⁵ Figure 5 notes major spending categories as a percentage of total spending.¹⁶

Figure 5: SSA Conference Spending by Expense Type in FYs 2013 Through 2016



Note: We included conferences with expenses in excess of \$20,000 and rounded data labels to total 100 percent.

Conference Costs per Attendee

On average, in FYs 2013 through 2016, SSA spent \$742 per attendee on conferences. As noted in Table 2, the Office of the Chief Strategic Officer had the highest expenses per attendee at \$1,759, while Operations had the lowest expense per attendee at \$347. A conference's duration and delivery method may affect the average cost per attendee. For example, ODAR's face-to-face training for new administrative law judges typically extends for several weeks. Operations' training typically includes more attendees with relatively lower travel expenses because it routinely uses local and video training to reduce costs.

¹⁵ Our November 2014 report noted that the conferences with the highest speaker costs often related to multiple sessions. For instance, the conference with about \$255,000 in speaker costs had 19 sessions. See SSA OIG, *supra* note 7, at p. 9.

¹⁶ See Appendix B for additional information on all spending categories for each year.

Table 2: 4-Year Average Cost per Attendee by SSA Component in FYs 2013 Through 2016

Component	4-Year Average
SSA – All	\$742
Chief Strategic Officer	\$1,759
ODAR	\$1,511
General Counsel	\$1,019
Budget, Finance, Quality, and Management	\$953
OIG	\$962
Human Resources	\$790
Retirement and Disability Policy	\$699
Communications	\$668
Operations	\$347

Note: The costs presented are weighted averages, calculated by dividing total expenses by total attendees. This data includes conferences with expenditures in excess of \$20,000. Costs per attendee are rounded.

CONCLUSIONS

SSA held 317 conferences in FYs 2013 through 2016 with expenditures over \$20,000 with costs totaling approximately \$31.9 million. SSA generally complied with Federal conference reporting requirements. However, in FY 2016, SSA did not notify OIG of two conferences with expenditures in excess of \$20,000 within 15 days of the conference dates as required.

RECOMMENDATION

We recommend SSA notify OIG of all conferences with expenditures in excess of \$20,000 within 15 days of the conference dates. If extenuating circumstances prevent OIG notification within 15 days, SSA should notify OIG as soon as it becomes aware of total expenditures.

AGENCY COMMENTS

SSA agreed with the recommendation; see Appendix C.



Rona Lawson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objective, we performed the following steps.

- Reviewed reports published by the Social Security Administration (SSA) and Office of the Inspector General (OIG) for Fiscal Years (FY) 2013 through 2016.
- Researched Federal guidance related to conference expenditures, controls, and reporting.
- Used SSA’s Conference Proposal and Approval System (CPAS) to determine the number of conferences in excess of \$20,000, the corresponding total expenditures, and whether the Agency reported each in accordance with applicable laws and policies for FYs 2013 through 2016. For this period, we also used reports outside CPAS to review conference expenditures for those years. Additionally, we assessed conference attributes, including the number of attendees, location types, and conference purposes according to reports made available to OIG through access to CPAS and other sources. We reconciled these reports on conferences costing more than \$100,000 to SSA’s annual conference expenditure reports.
- Interviewed personnel associated with conference management as well as staff of the Office of Financial Policy and Operations about SSA’s approval and reporting procedures.
- Met with other Agency components, as needed, for additional conference documentation outside what was available in CPAS.

We conducted our audit from June 2016 through January 2017 in Chicago, Illinois. We relied on conference information provided by Agency management. Our review was limited in scope to compiling and analyzing conference data as supplied to us by Agency management. As such, we relied on the representations of Agency personnel indicating that the data reported to us were complete and accurate to the best of their awareness and ability. The principle entities audited were the Offices of the Deputy Commissioners for Budget, Finance, Quality, and Management; Disability Adjudication and Review; Human Resources; and Operations. We obtained data on OIG conference spending from OIG conference reporting staff independent from the audit team. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B – ADDITIONAL DATA ON AGENCY CONFERENCES

The Social Security Administration’s (SSA) Office of Financial Policy and Operations (OFPO) is responsible for the Agency’s compliance with laws and guidance with respect to conference expenditure reporting. We reviewed conference reports available in SSA’s Conference Proposal and Approval System and other information provided by Agency components for Fiscal Years (FY) 2013 through 2016. We then compiled the results of our analysis in the tables below.

Table B–1: Agency-wide Conference Data¹ for FYs 2013 Through 2016

Measurement	FY 2013 ²	FY 2014	FY 2015 ³	FY 2016
Total Cost of Conferences with Reportable ⁴ Expenses Greater Than \$100,000	\$6,294,132	\$4,471,565	\$3,910,682	\$3,133,199
Average Cost of Conferences with Expenses Greater Than \$100,000	\$524,511	\$235,346	\$186,223	\$241,015
Total Cost of Conferences with Expenses Greater Than \$20,000	\$7,742,875	\$6,476,976	\$10,863,890	\$6,853,681
Average Cost of Conferences with Expenses Greater Than \$20,000	\$168,323	\$102,809	\$109,736	\$62,878
Number of Conferences with Expenses Greater Than \$100,000	12	19	21	13
Number of Conferences with Expenses Greater Than \$20,000	46	63	99	109
Conference Expenditures Per Attendee (Weighted Average)	\$713	\$648	\$629	\$1,396

Note 1: These data include conferences with expenditures in excess of \$20,000. Expenditures are rounded.

Note 2: A prior OIG audit focused on 49 conferences in FY 2013 at a total cost of \$7,798,902. We determined three of the previously reported conferences had final expenses below \$20,000, so we did not include them in this analysis of FY 2013 expenditures.

Note 3: After the Agency separated the FY 2015 conferences into single events, in compliance with guidance provided by the Office of Management and Budget, 99 conferences totaling \$10,863,890 became 153 less expensive individual events totaling \$9,193,350.

Table B–2: Total Conference Costs of SSA Components in FYs 2013 Through 2016

Component	FY 2013	FY 2014	FY 2015	FY 2016	Total
Disability Adjudication and Review	\$2,511,209	\$2,462,085	\$4,644,128	\$3,928,859	\$13,546,281
Human Resources	\$4,902,020	\$1,414,657	\$2,141,989	\$1,193,643	\$9,652,309
Operations	\$143,326	\$2,153,637	\$3,333,622	\$1,278,642	\$6,909,227
Budget, Finance, Quality, and Management	\$164,673	\$273,929	\$432,497	\$82,627	\$953,726
General Counsel	\$21,647	\$172,668	\$47,510	\$110,649	\$352,474
Communications	\$0	\$0	\$139,702	\$0	\$139,702
Chief Strategic Officer	\$0	\$0	\$54,007	\$48,000	\$102,007
Retirement and Disability Policy	\$0	\$0	\$0	\$23,773	\$23,773
Inspector General	\$0	\$0	\$70,435	\$187,488	\$257,923
Total	\$7,742,875	\$6,476,976	\$10,863,890	\$6,853,681	\$31,937,422

Note: These data include conferences with expenditures in excess of \$20,000. Expenditures are rounded.

Table B–3: Conference Spending by Expense Category in FYs 2013 Through 2016

Expense Category	FY 2013	FY 2014	FY 2015	FY 2016	Total
Transportation	\$3,063,102	\$2,810,046	\$4,252,409	\$1,831,996	\$11,957,553
Lodging	\$2,349,630	\$1,746,342	\$3,557,243	\$3,025,216	\$10,678,431
Meals & Incidentals	\$1,357,447	\$898,981	\$2,023,990	\$1,304,263	\$5,584,681
Speakers/Guests	\$497,868	\$628,653	\$745,047	\$521,737	\$2,393,305
Miscellaneous Travel	\$409,114	\$128,192	\$218,703	\$133,026	\$889,035
Supplies	\$47,036	\$29,704	\$55,273	\$32,443	\$164,456
Facility	\$6,030	\$54,156	\$0	\$0	\$60,186
Equipment	\$5,000	\$5,000	\$5,000	\$5,000	\$20,000
Government Meals	\$3,690	\$0	\$0	\$0	\$3,690
Other	\$3,958	\$175,902	\$6,225	\$0	\$186,085
Total	\$7,742,875	\$6,476,976	\$10,863,890	\$6,853,681	\$31,937,422

Note: These data include conferences with expenditures in excess of \$20,000. Expenditures are rounded.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: May 11, 2017 Refer To: S1J-3

To: Gale S. Stone
Acting Inspector General

From: Stephanie Hall
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, “Trends in the Social Security Administration's Conference Expenditures” (A-05-16-50230)--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 OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT,
“TRENDS IN THE SOCIAL SECURITY ADMINISTRATION’S CONFERENCE
EXPENDITURES” (A-05-16-50230)**

Thank you for the opportunity to review the draft report. We take our responsibility to protect and ensure the proper use of taxpayer funds very seriously. We have a strong review and approval process in place for all of our sponsored conferences and we continually strive to ensure we meet our conference reporting responsibilities.

Recommendation

We recommend SSA notify OIG of all conferences with expenditures in excess of \$20,000 within 15 days of the conference dates. If extenuating circumstances prevent OIG notification within 15 days, SSA should notify OIG as soon as it becomes aware of total expenditures.

Response

We agree.

MISSION

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