
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**OLD-AGE, SURVIVORS AND
DISABILITY INSURANCE AND
SUPPLEMENTAL SECURITY
INCOME PAYMENTS TO DECEASED
BENEFICIARIES AND RECIPIENTS**

October 2002

A-06-02-12012

AUDIT REPORT



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- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.
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By conducting independent and objective audits, investigations, and evaluations, we are agents of positive change striving for continuous improvement in the Social Security Administration's programs, operations, and management and in our own office.



SOCIAL SECURITY

MEMORANDUM

Date: October 30, 2002 Refer To:

To: The Commissioner

From: Inspector General

Subject: Old-Age, Survivors and Disability Insurance and Supplemental Security Income Payments to Deceased Beneficiaries and Recipients (A-06-02-12012)

OBJECTIVE

The objective of this audit was to determine the status of cases PricewaterhouseCoopers (PwC) identified in Fiscal Year (FY) 2000 as having a date of death posted on the Social Security Administration's (SSA) numerical identification (Numident) record, although the beneficiary or recipient remained in current pay status. As part of this objective, we determined whether SSA made payments to individuals who were deceased and the Death Master File (DMF) contained information on living beneficiaries or recipients.

BACKGROUND

The Old-Age, Survivors and Disability Insurance (OASDI) 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 payments to individuals who are 65 or older, blind or disabled.

Section 205(r) of the Social Security Act requires that SSA match States' death records against SSA payment records to identify and prevent erroneous payments after death. In addition, SSA matches death records from other Federal, State and local public assistance agencies. SSA posts a person's date of death to its Numident record and uses the Death Alert, Control, and Update System (DACUS) to receive and process death information. The purpose of DACUS is to ensure that all benefits to deceased beneficiaries are terminated appropriately and to produce a national record of death information, known as the DMF.

Specifically, SSA uses DACUS to

- receive death reports from various sources;
- compare the date of death to SSA's records to detect conflicting information or incorrect payments made after a beneficiary's death;
- post death information to SSA's DMF; and
- generate, control and follow up on alerts to SSA field staff if there are conflicting data with or among the payment records.

As part of SSA's FY 2000 Financial Statement Audit Management Letter, Part 2, PwC conducted integrity matches on death data. For FYs 1997 through 2000, PwC compared date of death information between the Master Beneficiary Record (MBR) (OASDI beneficiaries), Supplemental Security Record (SSR) (SSI recipients), and Numident record. The Numident record contains information provided by an individual when he or she applies for an original Social Security number (SSN) and subsequent applications for replacement cards. The integrity matches identified records in which individuals were listed as alive and in current pay status on SSA's MBR or SSR but deceased on the Agency's Numident record. Following is a summary of the PwC findings for FYs 1997 through 2000.¹

| Fiscal Year | OASDI Beneficiaries Listed as Deceased on Numident (5 percent sample) | Projected Number of OASDI Beneficiaries Listed as Deceased on Numident | SSI Recipients Listed as Deceased on Numident (5 percent sample) | Projected Number of SSI Recipients Listed as Deceased on Numident |
|-------------|---|--|--|---|
| 1997 | 819 | 16,380 | 60 | 1,200 |
| 1998 | 944 | 18,880 | 66 | 1,320 |
| 1999 | 867 | 17,340 | 49 | 980 |
| 2000 | 706 | 14,120 | 79 | 1,580 |

In its management letter to SSA, PwC recommended that the Agency design and implement data integrity checking programs for the full-production databases. PwC made the recommendation to have SSA identify the total population of records with potential data integrity problems as well as investigate and correct instances of invalid data on individual records that may affect payment status. In addition, PwC recommended that SSA refer any suspicious transactions to the Office of the Inspector General (OIG) for investigation. SSA agreed with the recommendations and stated it had long-range plans to strengthen data integrity. The plans included automated database clean-up efforts whenever technically feasible. As of August 2002, SSA was conducting a data integrity match against the entire beneficiary/recipient population.

¹ PwC's findings are based on a 5 percent sample of SSA records. PwC's methodology for projecting its findings was to multiply the sample results by 20.

SSA planned to commence corrective work on the results by the end of September 2002.

In a May 31, 2001 memorandum, the Boston Regional Commissioner emphasized the need for field offices (FO) to refocus their efforts in clearing death alerts promptly to avoid payments after death.² The Commissioner noted that, while the region had established targets for timely clearance of death alerts as part of its Workload Management Plan, it had not made progress in achieving the targets. The Commissioner also noted that the region had 32.1 percent of targeted alerts pending for more than 60 days—while the national average was 20.8 percent.

In testimony to Congress on how SSA gathers and distributes death information, SSA emphasized it takes its role as program steward seriously and stated “the integrity of this information is of utmost importance.”³

SCOPE AND METHODOLOGY

Our audit focused on the 706 OASDI beneficiaries and 79 SSI recipients identified by PwC as part of its Data Integrity Match for FY 2000. The Data Integrity Match compared the MBR, SSR and Numident records to determine whether individuals were alive and in current pay status on the MBR or SSR but listed as deceased on the Numident.

In performing the Data Integrity Match, PwC tested 5 percent of all OASDI beneficiaries and SSI recipients. This sample was selected using the last two digits of the beneficiaries’ or recipients’ SSNs.

To accomplish our objectives, we:

- Reviewed applicable sections of the Social Security Act, the Code of Federal Regulations, and SSA’s Program Operations Manual System.
- Reviewed prior audit reports related to payments to deceased beneficiaries.
- Obtained PwC’s integrity match data results for FY 2000.
- Obtained and analyzed beneficiary or recipient information from the MBR, SSR, and Numident record to determine whether a date of death discrepancy still existed.

² DACUS generates a death alert to the FO when a death report received from a State, local, or Federal agency shows that a beneficiary has died, but SSA’s payment record shows the person is alive.

³ Testimony to the House Committee on Ways and Means, Subcommittee on Social Security, and the House Committee on Financial Services, Subcommittee on Oversight and Investigations, November 8, 2001, concerning SSA’s collection, maintenance, and distribution of death information.

- Coordinated with SSA FOs and requested that they (1) determine whether individuals were alive or deceased, (2) correct the records, and (3) provide us the results of their efforts.
- Determined whether SSA made payments to individuals after their reported date of death.
- Quantified amounts paid after the death of a beneficiary or recipient.
- Referred questionable cases to the Office of Investigations.

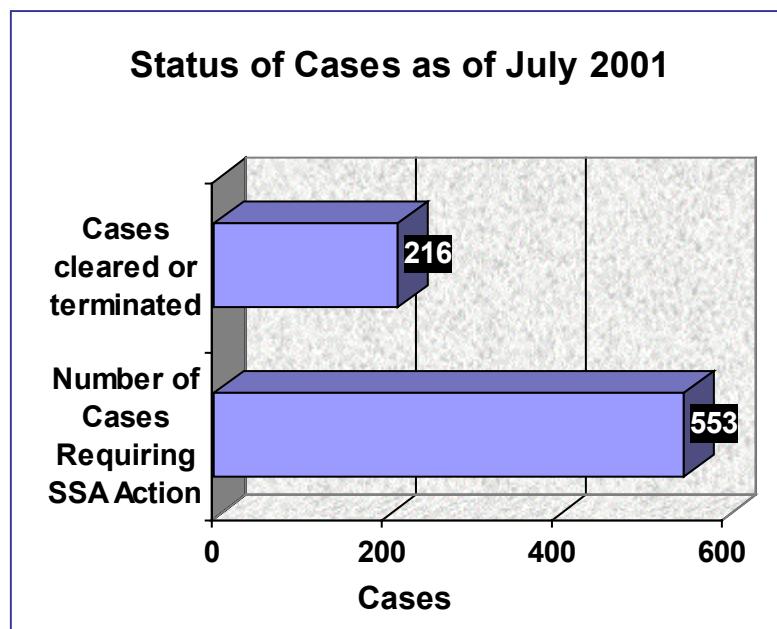
We conducted our review between June 2001 and April 2002 in Dallas, Texas. The entities audited were SSA's FOs under the Deputy Commissioner for Operations and the Office of Systems Design and Development under the Deputy Commissioner for Systems. We conducted our review in accordance with generally accepted government auditing standards.

RESULTS OF REVIEW

As of July 2001, SSA had not corrected the FY 2000 cases PwC identified as having a date of death discrepancy. Also, improper payments were made to beneficiaries or recipients after death and living individuals were listed on the DMF.

Untimely Resolution of Date of Death Discrepancies

SSA is required to compare death certificate information with records it uses (for example, MBR, SSR, and Numident) in administering its programs and to make corrections to accurately reflect the status of individuals.⁴ The PwC integrity match for FY 2000 projected that, based on a 5 percent segment of the beneficiary or recipient population, 14,120 OASDI cases and 1,580 SSI cases contained erroneous information in the Numident when compared with the MBR or SSR. The actual PwC sample found 706 OASDI cases and 79 SSI cases (including



⁴ Section 205(r) of the Act (42 U.S.C. § 405(r)(1)).

16 concurrent OASDI and SSI cases) that contained erroneous information. After allowing for the 16 concurrent cases, the sample found 769 individuals with a date of death discrepancy.

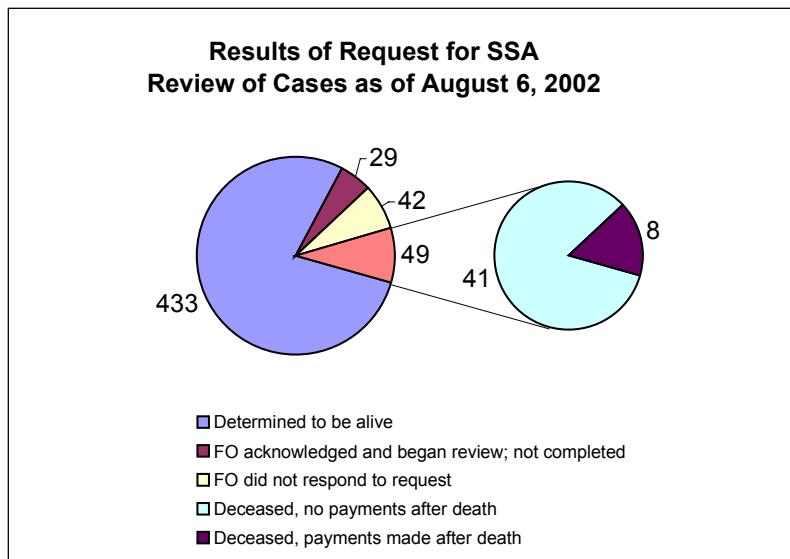
In July 2001, we analyzed payment status information in the MBRs and SSRs and compared it with date of death information in the Numident record for the 769 cases. We found that 553 (71.9 percent) of the cases still contained a discrepancy between the payment status information in the MBRs and SSRs. This high percentage of unresolved cases indicates that SSA did not correct the erroneous death information reflected in the Numident records although PwC brought the discrepancies to SSA's attention in the FY 2000 audit.

Improper Payments Made to Beneficiaries or Recipients After Death

The amount of payments after death in the population at-large could be approximately \$12.1 million for a projected 160 cases

were alive, and 48 were deceased. We requested that SSA determine whether the beneficiaries or recipients for the 553 cases that still reflected a date of death discrepancy at the time of our review were alive or deceased. We considered actions taken and responses received through April 30, 2002, the cut-off date for our review.⁵ As of that date, the FOs had provided information that 426 beneficiaries or recipients were alive, and 48 were deceased. For another 32 cases, FOs acknowledged our request for assistance and started the process of determining the individual's status; however, they had not completed their determination as of April 30, 2002. For the remaining 47 cases, FOs had not responded to our request for assistance. On August 6, 2002, SSA reported that another 7 cases were found to be alive, and 1 more was confirmed as deceased for a total of 433 alive and 49 deceased cases. Seventy-one cases remained unresolved.

We requested that SSA determine whether the beneficiaries or recipients for the 553 cases that still reflected a date of death discrepancy at the time of our review were alive or deceased. We considered actions taken and responses received through April 30, 2002, the cut-off date for our review.⁵ As of that date, the FOs had provided information that 426 beneficiaries or recipients were alive, and 48 were deceased. For another 32 cases, FOs acknowledged our



⁵ We e-mailed our requests for assistance to FOs on January 17 and 18, 2002. For cases with no response from FOs, we e-mailed follow-up requests for assistance from March 11 through 18, 2002.

In the 49 cases where the FO determined the individuals were deceased, the FOs reported that SSA made payments after death totaling \$605,195 in 8 cases (16.3 percent). Assuming the segment reviewed represents the population at-large, we project the amount of payments after death in the population could be approximately \$12.1 million for a projected 160 cases. This projection is conservative because it does not account for any payments after death that may be found in the 71 cases for which the Agency provided no determination.

Since these payments after death had not been detected before the FOs acted on our request for assistance, it is likely that, without a special effort to resolve date of death discrepancies, the payments may have continued indefinitely. For example, of the eight cases with payments after death, the case with the largest total payment was for an individual who had died in 1981.

The payment amounts for these eight cases ranged from \$1,883 to \$185,855 and may have involved fraudulent activity. In one case involving \$17,118, the payments were direct deposited into the recipient's account, but a monthly automatic withdrawal had been made to the local electric company from this account. In another case, SSA made payments by check to the deceased individual. The FO reported the checks appeared to have been cashed. In this case, the payment amount was \$21,184. All eight cases were referred to the OIG Office of Investigations.

| Status of Cases as of April 30, 2002 | OASDI | SSI | Combined OASDI/SSI (5 percent sample) | Projected Numbers in Overall Population |
|--------------------------------------|-----------|-----------|--|---|
| Determined to be Alive | 408 | 25 | 433 | 8,660 |
| Deceased-No Payments After Death | 38 | 3 | 41 | 820 |
| Deceased-Payments Made After Death | 4 | 4 | 8 | 160 |
| Cases in-process by FOs | 24 | 5 | 29 | 580 |
| No response from FOs | 35 | 7 | 42 | 840 |
| Totals | 509 | 44 | 553 | 11,060 |
| Amounts Paid After Death | \$472,530 | \$132,665 | \$605,195 | \$12,103,900 |

SSA processing errors contributed to date of death information being erroneously posted to the Numident records. For example, FO responses for 104 beneficiaries or recipients indicated the date of death on the Numident was actually the date of death of a spouse or other family member.⁶

⁶ We did not specifically ask this question, but some FOs volunteered this information with their responses.

Improper Postings to the Death Master File

In addition to the potential for continuing payments to deceased beneficiary and recipient accounts, instances in which the Numident record contains an erroneous date of death results in beneficiary and recipient information being made available to the public via the DMF. The DMF was created because of a consent judgment in 1980 resulting from a lawsuit brought by a private citizen under the Freedom of Information Act. The consent judgment requires that identifying information, including the SSN, be divulged for deceased individuals. Accordingly, SSA maintains a national file of death information (the DMF) that it is required to disclose to the public under the Freedom of Information Act.

The DMF is updated daily based on reports SSA receives and contains approximately 70 million records, including Social Security beneficiaries and non-beneficiaries, with verified and unverified reports of death. If available in SSA's records, and as required by the consent judgment, the file contains the deceased's SSN; first, middle, and surname; dates of death and birth; State, county, and ZIP code of the last address on our records; and ZIP code of the address used for the lump sum payment. The publicly available DMF is provided monthly to the Department of Commerce, National Technical Information Service (NTIS), which makes it available to the public under the Freedom of Information Act.

As previously stated, SSA did not resolve the discrepancies identified in the PwC integrity match. As of July 2001, 553 cases still reflected a date of death in the Numident record; therefore, it is likely information for these beneficiaries or recipients was included in the DMF at that time. In May 2002, we checked to see if the 426 living individuals and the 79 unresolved cases, as determined as of April 30, 2002, were listed in the public death records available on the Internet. Our review of the Ancestry.com Internet web site⁷ (there are several that use the Social Security Death Index) disclosed that 71 (16.7 percent) of the 426 living beneficiaries or recipients and 47 of the 79 unresolved cases were still listed in the web site. We did not determine how often this web site updates its death information; however, erroneous information might appear for an extended period in a web site if the web site does not update its information monthly.

⁷ The specific web site is found at <http://www.ancestry.com/search/rectype/vital/ssdi/main.htm>. Ancestry.com is an Internet service owned and operated by MyFamily.com, Inc. The company uses the Social Security Death Index as part of the research service it provides to the public. SSA recognizes that the Death Master File Extract is purchased by other parties through NTIS and is posted on different web sites. SSA does not endorse these sites, nor can SSA confirm that these private web sites are kept up-to-date or accurate with SSA's death data.

CONCLUSIONS AND RECOMMENDATIONS

SSA did not act to correct cases that had been identified as having a date of death discrepancy between the MBR or SSR and Numident records. Consequently, the Agency made payments to individuals after their death; also, private information for many living individuals was inadvertently listed in death records that were made available to the public. Although SSA plans to strengthen data integrity, which should reduce the number of date of death discrepancies, it is inevitable that errors to its system records will be posted either from unintentional errors or from inaccurate information. When such errors are discovered, SSA should take prompt action to verify the information and correct the records. Accordingly, we recommend that SSA:

1. Recover the \$605,195 paid after death for the eight individuals identified in the sample.
2. Ensure the data match of the entire population to identify cases that need to be corrected is completed and recover payments made after death (potentially \$12.1 million for 160 cases).
3. Ensure the 71 alive individuals, whose records were still listed in Internet death records, are removed from the DMF.
4. Determine whether the remaining 71 unresolved cases were alive, and, if so, remove them from the DMF and recover payments made after death if any.
5. Establish a schedule (such as quarterly) to conduct routine periodic data integrity matches to identify date of death discrepancies for review and correction.

AGENCY COMMENTS

SSA agreed with our recommendations. The text of SSA's comments is included in Appendix A.

OIG RESPONSE

We commend SSA for its prompt action on our recommendations. The quarterly identification of names and SSNs from the DMF that require investigation, if properly implemented, will minimize the risk that payments are made after death. Further, it should result in more timely correction of DMF records for individuals whose records were improperly listed as deceased. Also, SSA's data match of the entire population could potentially recover \$12.1 million in improper payments.



James G. Huse, Jr.

Appendices

APPENDIX A - Agency Comments

APPENDIX B - OIG Contacts and Staff Acknowledgments

Appendix A

Agency Comments



SOCIAL SECURITY

MEMORANDUM

31211-24-797

Date: September 30, 2002 Refer To: S1J-3

To: James G. Huse, Jr.
Inspector General

From: Larry W. Dye /s/
Chief of Staff

Subject: Office of the Inspector General (OIG) Draft Report, "Old-Age, Survivors and Disability Insurance and Supplemental Security Income Payments to Deceased Beneficiaries and Recipients" (A-06-02-12012)—INFORMATION

We appreciate OIG's efforts in conducting this review. Our comments on the report content and recommendations are attached. Staff questions can be referred to Odessa J. Woods on extension 50378.

Attachment:
SSA Comments

**COMMENTS OF THE SOCIAL SECURITY ADMINISTRATION (SSA) ON THE
OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "OLD-AGE,
SURVIVORS AND DISABILITY INSURANCE AND SUPPLEMENTAL SECURITY
INCOME PAYMENTS TO DECEASED BENEFICIARIES AND RECIPIENTS"**
(A-06-02-12012)

Thank you for the opportunity to review the subject draft report.

We offer the following comments.

Recommendation 1

Recover the \$605,195 paid after death for the eight individuals identified in the sample.

SSA Comment

We agree. SSA will review and contact the appropriate office to obtain the status of the eight individuals identified in the sample. We expect to have these cases reviewed and recovery started on each case within the month.

Recommendation 2

Ensure that the data match of the entire population to identify cases that need to be corrected is completed and recover payments made after death (potentially \$12.1 million for 160 cases).

SSA Comment

We agree. Earlier this year SSA began a data match of the entire population to identify cases that needed to be corrected. The selection criteria were reevaluated and in August 2002, the data match was done again. It is expected that by the end of September 2002, SSA will begin corrective work on the results.

Recommendation 3

Ensure that the 71 live individuals, whose records were still listed in Internet death records, are removed from the Death Master File (DMF).

SSA Comment

We agree. SSA will review the 71 cases when received from OIG against the DMF to determine if they have been removed. If the Social Security numbers (SSN) have not been removed, the appropriate office will be notified to take the necessary corrective action.

Recommendation 4

Determine if the remaining 71 unresolved cases were alive and, if so, remove them from the DMF and recover payments made after death if any.

SSA Comment

We agree. SSA has sent the 71 unresolved cases to the appropriate office for follow up status and corrective actions. SSA expects all cases to be reviewed by the end of October 2002.

Recommendation 5

Establish a schedule (such as quarterly) to conduct routine periodic data integrity matches to identify date of death discrepancies for review and correction.

SSA Comment

We agree with the recommendation. In March 2002, SSA implemented an automated utility that performs a comparison of the DMF against the Master Beneficiary Record and Supplemental Security Record to detect inconsistent death data. The utility provides the field with a quarterly electronic and hard copy report titled "DMF MATCH" that lists names and SSNs that require investigation.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Kimberly Byrd, Director, Southern Audit Division (205) 801-1605

Paul Davila, Deputy Director (214) 767-6317

Acknowledgments

In addition to those named above:

Billy W. Mize, Auditor-in-Charge

Joshua M. Campos, Auditor

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| Ranking Minority Member, Senate Special Committee on Aging | 1 |
| President, National Council of Social Security Management Associations, Incorporated | 1 |
| Treasurer, National Council of Social Security Management Associations, Incorporated | 1 |
| Social Security Advisory Board | 1 |
| AFGE General Committee | 9 |
| President, Federal Managers Association | 1 |
| Regional Public Affairs Officer | 1 |
| Total | 96 |

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The Office of Audit (OA) conducts comprehensive financial and performance audits of the Social Security Administration's (SSA) programs and makes recommendations to ensure that program objectives are achieved effectively and efficiently. Financial audits, required by the Chief Financial Officers' Act of 1990, assess whether SSA's financial statements fairly present the Agency's financial position, results of operations and cash flow. Performance audits review the economy, efficiency and effectiveness of SSA's programs. OA also conducts short-term management and program evaluations focused on issues of concern to SSA, Congress and the general public. Evaluations often focus on identifying and recommending ways to prevent and minimize program fraud and inefficiency, rather than detecting problems after they occur.

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The Office of Investigations (OI) conducts and coordinates investigative activity related to fraud, waste, abuse, and mismanagement of SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, physicians, interpreters, representative payees, third parties, and by SSA employees in the performance of their duties. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

Counsel to the Inspector General

The Counsel to the Inspector General provides legal advice and counsel to the Inspector General on various matters, including: 1) statutes, regulations, legislation, and policy directives governing the administration of SSA's programs; 2) investigative procedures and techniques; and 3) legal implications and conclusions to be drawn from audit and investigative material produced by the OIG. The Counsel's office also administers the civil monetary penalty program.