
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**ADMINISTRATIVE COSTS
CLAIMED BY THE
OHIO DIVISION OF DISABILITY
DETERMINATION**

September 2011

A-05-09-19127

AUDIT REPORT



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SOCIAL SECURITY

MEMORANDUM

Date: September 16, 2011 Refer To:

To: Nancy A. Berryhill
Regional Commissioner
Chicago

From: Inspector General

Subject: Administrative Costs Claimed by the Ohio Division of Disability Determination
(A-05-09-19127)

For our audit of Federal Fiscal Year (FY) 2008 and 2009 administrative costs claimed by the Ohio Division of Disability Determination (OH-DDD), our objectives were to

1. evaluate OH-DDD's internal controls over the accounting and reporting of administrative costs;
2. determine whether costs claimed by the OH-DDD were allowable and funds were properly drawn; and
3. assess limited areas of the general security controls environment.

BACKGROUND

Disability determination services (DDS) in each State or other responsible jurisdiction perform disability determinations under the Social Security Administration's (SSA) Disability Insurance and Supplemental Security Income programs according to Federal regulations.¹ Each DDS is responsible for determining claimants' disabilities and ensuring adequate evidence is available to support its determinations.

To make proper disability determinations, SSA authorizes each DDS to purchase medical examinations, x rays, and laboratory tests on a consultative basis to supplement evidence obtained from the claimants' physicians or other treating sources.² SSA reimburses the DDS for 100 percent of allowable reported expenditures up to its

¹ The Social Security Act §§ 221 and 1614, 42 U.S.C. §§ 421 and 1382c; see also 20 C.F.R. §§ 404.1601 et seq. and 416.1001 et seq.

² 20 C.F.R. §§ 404.1624 and 416.1024.

approved funding authorization, based on a *State Agency Report of Obligations for SSA Disability Programs* (Form SSA-4513).³

RESULTS OF REVIEW

We determined that costs claimed by the OH-DDD for the period October 1, 2007 through September 30, 2009 were allowable and properly allocated, and the system of internal controls over the accounting and reporting of administrative costs was effective. In addition, cumulative draws did not exceed cumulative disbursements during our audit period. Finally, our limited review of OH-DDD's controls over its physical security and personally identifiable information generally showed that controls were in place. (See Appendix C for costs reported on Forms SSA-4513.) However, we found the following issues: (1) untimely cash draws; (2) a missing corrective action plan (CAP); and (3) incomplete or missing steps related to security and safety.

CASH DRAWS

Our review of cash draws for the first quarter of FY 2008 found that staff drew funds for personnel costs in some instances more than 3 days before the day the State would have made a payroll disbursement. The *Cash Management Improvement Act of 1990* (CMIA) agreement requires that the State request funds no more than 3 days before it makes a disbursement.⁴ The cash draw situation improved in FY 2009. Our review of cash draws for the first quarter of FY 2009 affirmed that staff drew funds within 3 days.

We relied on representations made in the *Single Audit of the State of Ohio* for FYS ended June 30, 2008 and June 30, 2009 because the Ohio Rehabilitation Services Commission (OH-RSC) could not provide us with a copy of the CMIA agreement at the time of our review. To ensure the appropriate draw down of funds in accordance with Federal requirements, OH-RSC should continue monitoring its drawdown process and provide a copy of the CMIA agreement to the staff responsible for cash draws.

CORRECTIVE ACTION PLAN

Chicago regional office (RO) staff indicated that OH-DDD submitted *DDS Security Checklists* for FYS 2008 and 2009 and the FY 2009 CAP. However, OH-DDD did not submit a copy of a FY 2008 CAP or documentation to support that OH-DDD evaluated risks associated with any of its negative responses. SSA policy states any "no" answer made on a *DDS Security Checklist* requires a CAP or risk assessment.⁵ If a DDS does not submit a CAP as required, the risks may remain unaddressed, which could result in unauthorized access to sensitive SSA information.

³ See Appendix B for additional background, scope, and methodology.

⁴ Pub. L. No. 101-453, 104 Stat. 1058, in part amending 31 U.S.C. §§ 3335, 6501, and 6503 (1990).

⁵ SSA, POMS, DI 39567.410 — *Exhibit: DDS Security Checklist* (effective April 8, 2011).

In FY 2010, the Agency automated the *DDS Security Checklists* into a Web-based application, requiring that DDS staff provide comments or document planned corrective actions for any of its negative responses. The RO expects OH-DDD to complete its first online security checklist later this year. The RO should monitor the responses to the *DDS Security Checklist* to ensure that OH-DDD's corrective action plan appropriately addresses any risks.

SECURITY AND SAFETY

Our audit identified issues regarding security, safety, and training practices at the OH-DDD, including (1) an incomplete security plan, (2) lack of security awareness training, and (3) undocumented evacuation and fire drills.

Security Plan

OH-DDD's security plan was not current and did not contain all essential information required by SSA policy.⁶ We found parts of the plan were outdated, whereas other information was missing, although available in separate paper files. For example, the organizational chart for OH-DDD listed a director who had departed 2 years earlier. Additionally, OH-DDD did not provide some of the documentation required by Agency policy in the electronic files we reviewed. Table 1 outlines our findings.

Table 1. Results of Review of OH-DDD's Security Plan

Security Plan Information Required by Agency Policy	Outdated	Incomplete or Missing Items
Part A – Physical Security Description	✓	✓
Part B – DDS Systems Interconnection Access		✓
Part C – Systems Security Training	✓	✓
Part D – Systems Review/Recertification	✓	✓
Part E – Violation Reports and Resolution		✓
Part F – Continuity of Operations	✓	✓
Part G – Disaster Recovery		✓
Part H – Risk Assessment/Exceptions		✓

An outdated or incomplete security plan could result in a longer recovery period following a catastrophic event. To ensure the security plan remains meaningful, the RO should instruct OH-DDD to update its plan timely to meet SSA's requirements.

Annual Security Awareness Training

OH-DDD staff was not completing annual security awareness training, nor was the RO monitoring OH-DDD's compliance with the requirement. SSA policy states that management must (1) train personnel at least annually on security awareness and responsibilities in protecting personally identifiable information and maintaining integrity

⁶ SSA, POMS, DI 39567.160 — *DDS Security Plan Overview* (effective November 8, 2010).

and (2) validate the training.⁷ In addition, all employees and contractors must sign an annual statement acknowledging their understanding of security awareness. The DDS should keep the signed statement on file in the DDS for at least 1 year and send a copy to the designated RO component, such as the Center for Disability Programs or the Center for Security and Integrity (CSI).⁸

We reviewed a sample of security awareness training acknowledgement statements for FY 2009 to ensure that the OH-DDD provided training to employees, and found the OH-DDD could only provide 18 of 25 (73 percent) of the forms. When we asked to view signed statements from FY 2010, we found that OH-DDD did not conduct the required annual training that year. Our review of signed statements from FY 2011 indicated OH-DDD generally documented that employees had completed the annual security awareness training.

When we spoke with regional management about this matter, we found that neither the Center for Disability Programs nor CSI at the Chicago RO had requested copies of the forms from any DDS in the Region. According to RO management, it planned to instruct the DDSs in the Region to send the forms to CSI in the future. Had the RO requested the forms, it would have found that OH-DDD did not conduct security awareness training in FY 2010.

The signed statements document that DDS employees and contractors are aware of systems security policies, and would “eliminate an excuse of ignorance” if rules are violated.⁹ SSA should instruct OH-DDD to conduct security awareness training annually. In addition, OH-DDD should continue to maintain the signed statements on file for a minimum of 1 year and send copies to the RO CSI. Finally, the RO should work with OH-DDD as well as the other DDSs in the Region to ensure the DDSs send adequate documentation to CSI to validate the training provided to employees and contractors.

Evacuation and Fire Drills

OH-DDD staff members informed us they do not maintain records of emergency evacuation schedules or shelter-in-place exercises. They also stated that the last drill of any type conducted was a fire drill in the spring/summer of 2009. SSA policy requires that each DDS office conduct evacuation drills twice annually and document the results.¹⁰ OH-DDD should ensure evacuation and fire drills, as well as shelter-in-place

⁷ SSA, POMS, DI 39567.355.C.1 — *DDS Security Awareness and Training Overview* (effective May 16, 2011).

⁸ *Id.* at C.3.

⁹ *Id.*

¹⁰ SSA, POMS, DI 39567.030.A.7 — *DDS Office Safety Guidelines* (effective April 11, 2011).

exercises, are tracked and recorded by type and frequency. OH-DDD can use OH-RSC's *Checklist for Fire Emergency Drills and Plans Evaluation* and the *Checklist for Tornado Emergency Drills and Plans Evaluation* to document the results of these exercises.

CONCLUSION AND RECOMMENDATIONS

Overall, OH-DDD had effective internal controls over the accounting and reporting of administrative costs for FYs 2008 and 2009. In addition, OH-DDD had satisfactory controls in place for its physical security and securing personally identifiable information. However, we identified issues with untimely cash draws, a missing corrective action plan, and incomplete or missing steps related to security and safety.

To improve controls over the drawdown of funds, we recommend SSA instruct OH-RSC to:

1. Continue to monitor its drawdown process to ensure it draws funds for OH-DDD in accordance with Federal requirements.
2. Provide a copy of the CMIA agreement to the staff responsible for cash draws.

To address the other issues identified in our report, we recommend SSA instruct OH-DDD to:

3. Update OH-DDD's security plan to meet SSA requirements.
4. Conduct security awareness training annually.
5. Maintain the signed annual security awareness acknowledgement statements on file for a minimum of 1 year, and send copies to the RO CSI.
6. Create and periodically update a schedule to track the type and frequency of all drills, including evacuation and fire drills and shelter-in-place exercises.

Finally, to improve regional oversight of DDS offices, we recommend SSA:

7. Monitor the responses to the *DDS Security Checklist* to ensure that OH-DDD's CAP appropriately addresses any risks.
8. Work with OH-DDD as well as the other DDSs in the Region to ensure that the DDSs send adequate documentation to CSI to validate the training provided to employees and contractors.

AGENCY COMMENTS

SSA and the OH-DDD agreed with our recommendations. The comments from the Agency and the OH-DDD are included in Appendices D and E, respectively.

A handwritten signature in black ink, appearing to read "Patrick P. O'Carroll, Jr."

Patrick P. O'Carroll, Jr.

Appendices

[APPENDIX A](#) – Acronyms

[APPENDIX B](#) – Background, Scope, and Methodology

[APPENDIX C](#) – Schedule of Total Costs Reported on Forms SSA-4513—*State Agency Reports of Obligations for SSA Disability Programs*

[APPENDIX D](#) – Agency Comments

[APPENDIX E](#) – Ohio Division of Disability Determination Comments

[APPENDIX F](#) – OIG Contacts and Staff Acknowledgments

Appendix A

Acronyms

Act	<i>Social Security Act</i>
CAP	Corrective Action Plan
C.F.R.	Code of Federal Regulations
CMIA	<i>Cash Management Improvement Act of 1990</i>
CSI	Center for Security and Integrity
DDS	Disability Determination Services
DI	Disability Insurance
Form SSA-4513	<i>State Agency Report of Obligations for SSA Disability Programs</i>
FY	Fiscal Year
IT	Information Technology
OH-DDD	Ohio Division of Disability Determination
OH-RSC	Ohio Rehabilitation Services Commission
OMB	Office of Management and Budget
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
RO	Regional Office
SSA	Social Security Administration
SSI	Supplemental Security Income
U.S.C.	United States Code

Background, Scope, and Methodology

BACKGROUND

The Disability Insurance (DI) program, established under Title II of the *Social Security Act* (Act), provides benefits to wage earners and their families in the event the wage earner becomes disabled. The Supplemental Security Income (SSI) program, established under Title XVI of the Act, provides payments to financially needy individuals who are aged, blind, or disabled.

The Social Security Administration (SSA) is responsible for implementing policies for the development of disability claims under the DI and SSI programs. Disability determinations under both the DI and SSI programs are performed by disability determination services (DDS) in each State, Puerto Rico, and the District of Columbia. Such determinations are required to be performed in accordance with Federal law and underlying regulation.¹ In carrying out its obligation, each DDS is responsible for determining claimants' disabilities and ensuring adequate evidence is available to support its determinations. To assist in making proper disability determinations, each DDS is authorized to purchase medical examinations, x rays, and laboratory tests on a consultative basis to supplement evidence obtained from the claimants' physicians or other treating sources.

SSA reimburses the DDS for 100 percent of allowable reported expenditures up to its approved funding authorization. The DDS withdraws Federal funds through the Department of the Treasury's Automated Standard Application for Payments System to pay for program expenditures. Funds drawn down must comply with Federal regulations² and intergovernmental agreements entered into by the Department of the Treasury and States under the *Cash Management Improvement Act of 1990*.³ An advance or reimbursement for costs under the program must comply with the Office of Management and Budget's (OMB) Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments*. At the end of each quarter of the Fiscal Year (FY), each DDS submits a *State Agency Report of Obligations for SSA Disability Programs* (Form SSA-4513) to account for program disbursements and unliquidated obligations.

¹ The *Social Security Act* §§ 221 and 1614, 42 U.S.C. §§ 421 and 1382c; see also 20 C.F.R. §§ 404.1601 et seq. and 416.1001 et seq.

² 31 C.F.R. § 205.

³ Pub. L. No. 101-453, 104 Stat. 1058, in part amending 31 U.S.C. §§ 3335 6501 and 6503 (1990).

SCOPE

To accomplish our objectives, we reviewed the administrative costs Ohio Division of Disability Determination (OH-DDD) reported on its Forms SSA-4513 for FYs 2008 and 2009. For the periods reviewed, we obtained evidence to evaluate recorded financial transactions and determine whether they were allowable under OMB Circular A-87 and appropriate, as defined by SSA's Program Operations Manual System (POMS).

We also:

- Reviewed applicable Federal laws, regulations, and pertinent parts of SSA's POMS and other instructions pertaining to administrative costs incurred by OH-DDD and draw down of SSA funds.
- Reviewed the State of Ohio Single Audit reports issued in 2008 and 2009.
- Interviewed staff at OH-DDD and SSA's Chicago regional office.
- Evaluated and tested internal controls regarding accounting and financial reporting and cash management activities.
- Verified the reconciliation of official State accounting records to the administrative costs reported by OH-DDD on Forms SSA-4513 for FYs 2008 and 2009.
- Examined the administrative expenditures (Personnel, Medical, and All Other Non-personnel costs) incurred and claimed by OH-DDD for FYs 2008 and 2009 on Forms SSA-4513.
- Examined the indirect costs claimed by OH-DDD for FYs 2008 and 2009 and the corresponding indirect cost rate agreements.
- Compared the amount of SSA funds drawn to support program operations to the allowable expenditures reported on Forms SSA-4513.
- Conducted limited general control testing, which encompassed reviewing the physical access security at the DDS.
- Reviewed policies and procedures related to personally identifiable information to determine whether the DDS had controls in place to protect these data.

The electronic data used in our audit were sufficiently reliable to achieve our audit objectives. We assessed the reliability of the electronic data by reconciling them with the costs claimed on the Forms SSA-4513. We also conducted detailed audit testing on selected data elements in the electronic data files.

We performed our audit at the OH-DDD in Columbus, Ohio, and the Office of Audit in Chicago, Illinois, from September 2010 through July 2011. We conducted our 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 objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

METHODOLOGY

Our sampling methodology encompassed the three general areas of costs as reported on Forms SSA-4513: (1) Personnel, (2) Medical, and (3) All Other Non-personnel costs. We obtained computerized data from OH-DDD for FYs 2008 and 2009 for use in statistical sampling.

Personnel Costs

We sampled 50 employee salary items from 1 randomly selected pay period in FY 2009. We tested regular and overtime payroll and hours for each individual selected. We verified that approved time records were maintained and supported the hours worked. We tested payroll records to ensure OH-DDD correctly paid employees and adequately documented these payments. We also tested benefit calculations.

In addition, we sampled 50 medical consultant costs from FY 2009. We determined whether sampled costs were reimbursed properly and ensured the selected medical consultants were licensed.

Medical Costs

We sampled 100 medical evidence and consultative examination records (50 items from each FY) using a proportional random sample. We determined whether sampled costs were properly reimbursed.

All Other Non-Personnel Costs

We stratified all other non-personnel costs into eight categories: (1) Occupancy, (2) Contracted Costs, (3) New Electronic Data Processing Equipment/Upgrades, (4) Communications, (5) Applicant Travel, (6) DDS Travel, (7) Supplies, and (8) Miscellaneous. We selected a stratified random sample of 50 items from each FY based on the percentage of costs in each category (excluding the rent portion of Occupancy) to total costs. We also performed a 100-percent review of the rent portion of Occupancy expenditures.

Appendix C

Schedule of Total Costs Reported on Forms SSA-4513—State Agency Reports of *Obligations for SSA Disability Programs*

Ohio Division of Disability Determination

FISCAL YEARS (FY) 2008 and 2009 COMBINED			
REPORTING ITEMS	DISBURSEMENTS	UNLIQUIDATED OBLIGATIONS	TOTAL OBLIGATIONS
Personnel	\$83,936,889	\$0	\$83,936,889
Medical	\$48,676,323	\$0	\$48,676,323
Indirect	\$15,591,189	\$0	\$15,591,189
All Other	\$8,356,308	\$0	\$8,356,308
TOTAL	\$156,560,709	\$0	\$156,560,709
FY 2008			
REPORTING ITEMS	DISBURSEMENTS	UNLIQUIDATED OBLIGATIONS	TOTAL OBLIGATIONS
Personnel	\$39,988,859	\$0	\$39,988,859
Medical	\$23,745,482	\$0	\$23,745,482
Indirect	\$7,408,743	\$0	\$7,408,743
All Other	\$3,668,173	\$0	\$3,668,173
TOTAL	\$74,811,257	\$0	\$74,811,257
FY 2009			
REPORTING ITEMS	DISBURSEMENTS	UNLIQUIDATED OBLIGATIONS	TOTAL OBLIGATIONS
Personnel	\$43,948,030	\$0	\$43,948,030
Medical	\$24,930,841	\$0	\$24,930,841
Indirect	\$8,182,446	\$0	\$8,182,446
All Other	\$4,688,135	\$0	\$4,688,135
TOTAL	\$81,749,452	\$0	\$81,749,452

Agency Comments

DATE: August 31, 2011
TO: Inspector General
FROM: Regional Commissioner
Chicago
SUBJECT: Audit # 22009036- Request Draft Report Comments (A-05-09-19127)–
REPLY

Thank you for the opportunity to comment on the subject draft report "Administrative Costs Claimed by the Ohio Division of Disability Determination" (A-05-09-19127). We have completed our review, and are pleased to concur with your assessment that the DDS' internal controls over administrative cost accounting and reporting are effective. We agree with the findings contained in the draft report, and have no additional comments.

In addition, I want to acknowledge your staff for its efforts in conducting such a comprehensive review under sometimes challenging circumstances. The audit team worked closely with staff from both the Regional Office and the Ohio DDS, and we truly appreciate the open lines of communication.

If members of your staff have any questions, they may contact Chris Wood, Management and Operations Support, Financial Management Team, at 312-575-4145.

/s/
Mark Moskop for
Nancy A. Berryhill

Appendix E

Ohio Division of Disability Determination Comments



John R. Kasich
Governor
Kevin L. Miller
Executive Director

Rehabilitation Services Commission

Bureau of Services for the Visually Impaired
Bureau of Vocational Rehabilitation
Division of Disability Determination

September 2, 2011

Ms. Deborah Kinsey
Audit Manager
SSA/OIG
Chicago Audit Division

Dear Ms. Kinsey:

In response to your draft audit (A-05-09-19127) dated August 11, 2011, the Ohio Division of Disability Determination concurs with your findings.

We will take the appropriate steps to ensure that we are in compliance with all policies and procedures as outlined in your recommendations.

We wish to thank the audit team for their professionalism and assistance to help us address these issues.

Please do not hesitate to contact me if you need any additional information.

Sincerely,

Erik Williamson
Deputy Director for Disability Determination
Ohio Rehabilitation Services Commission
400 E. Campus View Blvd.
Columbus, OH 43035

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Appendix F

OIG Contacts and Staff Acknowledgments

OIG Contacts

Walter Bayer, Director, Chicago Audit Division

Deborah Kinsey, Audit Manager, Chicago Office

Acknowledgments

In addition to those named above:

Elizabeth Ochoa, Senior Auditor

Nichole Bazemore, Auditor

Linda Smid, Auditor

Wai Ho Yung, Auditor

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