



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

Congressional Response Report

The Social Security Administration's
Anti-fraud Training

A-01-16-50035 / September 2015

OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

September 22, 2015

The Honorable Sam Johnson
Chairman, Subcommittee on
Social Security
Committee on Ways and Means
House of Representatives
Washington, DC 20515

Dear Chairman Johnson:

In response to your February 24, 2015 request, my Office of Audit reviewed the Social Security Administration's (SSA) anti-fraud training initiatives during Fiscal Year 2014 and compared the training to previous years.

To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

If you have any questions concerning this matter, please call me or have your staff contact Kristin Klima, Congressional and Intragovernmental Liaison at (202) 358-6319.

Sincerely,



Patrick P. O'Carroll, Jr.
Inspector General

Enclosure

cc:
Carolyn W. Colvin

The Social Security Administration's Anti-fraud Training

A-01-16-50035



September 2015

Office of Audit Report Summary

Objective

To answer specific questions from the Subcommittee on Social Security regarding the Social Security Administration's (SSA) anti-fraud training.

Background

We received the following questions from the Subcommittee on Social Security.

1. What anti-fraud training has been done and how was the Fiscal Year (FY) 2014 training different from previous years?
2. Who participated in anti-fraud training and how did participation differ in FY 2014 versus previous years?
3. How is participation in anti-fraud training tracked?
4. Did all front-line employees receive formal anti-fraud training, and how was participation confirmed?
5. How does SSA determine the effectiveness of the training?
6. Did experts in fraud and investigations participate in the training?
7. Are current metrics to evaluate anti-fraud training appropriate? What are other ways to determine effectiveness of the training?

Findings

Before FY 2014, standardized fraud training was a segment in existing training courses for front-line employees, and SSA offered some fraud-related training on-demand via the Agency's Intranet. In addition, the Office of the Inspector General (OIG) and Cooperative Disability Investigations units provided SSA and disability determination services (DDS) employees with *ad hoc* training sessions.

In FY 2014, we worked with SSA to develop and present mandatory, standardized anti-fraud training for all SSA and DDS employees.

This was in addition to the fraud-related training efforts already in place, but differed from prior years in that mandatory anti-fraud training developed by both SSA and OIG was not required of all SSA and DDS employees before 2014.

The Agency required certification at the Deputy Commissioner level of each component that employees completed the mandatory 2014 anti-fraud training.

SSA used its online Learning Management System, Employees-with-Disabilities software, Video on Demand, and Interactive Video Teletraining equipment to conduct anti-fraud training. However, these training outlets did not always track each employee who participated in the training, since multiple employees can view a single Interactive Video Teletraining or Video on Demand broadcast together as part of a class or in a staff meeting at which participants' attendance may not be registered.

While SSA evaluated the content and delivery of anti-fraud training, the Agency does not have a baseline measure of fraud in its programs. Therefore, the Agency cannot determine the impact of the anti-fraud training.

TABLE OF CONTENTS

Objective	1
Background	1
Results of Review	1
1. What anti-fraud training has been done at SSA and DDSs and how was the FY 2014 training different from previous years?	1
Before Mandatory FY 2014 Anti-fraud Training	3
2. Who participated in anti-fraud training and how did participation differ in FY 2014 versus previous years?	6
3. How is participation in anti-fraud training tracked at SSA and DDSs?	6
4. Did all front-line employees of both SSA and DDSs receive formal anti-fraud training, and how was participation confirmed?	7
5. How does SSA determine the effectiveness of the anti-fraud training?	7
6. Did experts in fraud and investigations, such as CDI unit members, participate in the training?	7
7. Are current metrics SSA uses to evaluate anti-fraud training appropriate? What are other ways to determine effectiveness of the training?	8
Conclusions	12
Appendix A – Congressional Request	A-1
Appendix B – Scope and Methodology	B-1
Appendix C – 2014 Mandatory Anti-Fraud Training	C-1
Appendix D – Fraud Training for Front-Line Employees	D-1
Appendix E – Office of the Inspector General Anti-Fraud Outreach	E-1
Appendix F – SSA Policy Chapters on Fraud	F-1
Appendix G – Examples of Intranet Resources	G-1
Appendix H – Social Security Administration Fiscal Year 2014 Agency Financial Report	H-1
Appendix I – Major Contributors	I-1

ABBREVIATIONS

AFR	Agency Financial Report
CDI	Cooperative Disability Investigations
CR	Claims Representative
DDS	Disability Determination Services
FY	Fiscal Year
ODAR	Office of Disability Adjudication and Review
OIG	Office of the Inspector General
SSA	Social Security Administration
SSA LMS	Social Security Administration National Learning Management System

OBJECTIVE

Our objective was to answer specific questions from the Subcommittee on Social Security regarding the Social Security Administration's (SSA) anti-fraud training.

BACKGROUND

On February 24, 2015, we received a request from the House Committee on Ways and Means, Subcommittee on Social Security, to answer the following questions.

1. What anti-fraud training has been done at SSA and disability determination services (DDS) and how was the Fiscal Year (FY) 2014 training different from previous years?
2. Who participated in anti-fraud training (that is, all employees, front-line employees, disability examiners, etc.) and how did participation differ in FY 2014 versus previous years?
3. How is participation in anti-fraud training tracked at SSA and DDSs?
4. Did all front-line employees of both SSA and DDSs receive formal anti-fraud training, and how was participation confirmed?
5. How does SSA determine the effectiveness of the anti-fraud training?
6. Did experts in fraud and investigations, such as Cooperative Disability Investigations (CDI) unit members, participate in the training?
7. Are current metrics SSA uses to evaluate anti-fraud training appropriate? What are other ways to determine effectiveness of the training?

See Appendix A for the congressional request and Appendix B for our scope and methodology.

RESULTS OF REVIEW

The answers to the Subcommittee's questions are below.

1. What anti-fraud training has been done at SSA and DDSs and how was the FY 2014 training different from previous years?

Beginning in FY 2014, fraud training was mandatory for all SSA and DDS employees (see Appendix C). Specifically, the Agency worked with us to develop and present mandatory standardized nationwide anti-fraud training. The training was about 30 minutes and covered the following items.

- What constitutes fraud, waste, and abuse.
- Fraud patterns and indicators.
- Reporting fraud and examples of what to report.
- What not to report.

- Completing the online fraud reporting form.
- The CDI program.¹
- Civil monetary penalties.

In addition, on April 3, 2014, the Acting Commissioner re-instituted the National Anti-Fraud Committee, co-chaired by the Inspector General and the Deputy Commissioner for Budget, Finance, Quality, and Management. Its mission is to support national and regional strategies to combat fraud, waste, and abuse. The Committee also serves as an advisory board for the Office of Anti-Fraud Programs, which was established in 2014 to lead Agency anti-fraud efforts. The establishment of this office was featured on an episode of *Good Morning Social Security*, a short weekly video broadcast to all employees that highlights Agency news and information.

Also, the Agency held a National Anti-Fraud Conference at its Headquarters on September 18, 2014. The conference included high-level management officials from each Deputy Commissioner-level component and OIG. The Acting Commissioner and the Inspector General attended. Agenda items for the conference included the following topics.

- National Anti-Fraud Committee background and initiative overview.
- eService fraud.
- Fraud enforcement and penalties.
- Fraud training and communication.
- Disability fraud.
- “Best practices” forum.

Further, the Acting Commissioner conducted a virtual town hall meeting in March 2015. More than 27,000 SSA employees participated in-person, via Interactive Video Teletraining, teleconference, or closed-circuit television. The meeting was recorded and made available through Video on Demand. The Agency’s anti-fraud efforts were one of the topics the Acting Commissioner addressed, highlighting the November 2014 establishment of the Office of Anti-fraud Programs and the planned expansion of CDI units from 28 to 35, as well as acknowledging the important role front-line employees have in detecting and reporting fraud.

¹ SSA and OIG jointly established the CDI program in FY 1998, in conjunction with State DDSs and State or local law enforcement agencies, to effectively pool resources and expertise to prevent fraud in SSA’s disability programs. CDI units investigate disability claims under SSA’s Title II and XVI programs that State disability examiners believe are suspicious. The CDI program’s primary mission is to obtain evidence that can resolve questions of fraud before benefits are paid. CDI units also provide reports to DDS examiners during continuing disability reviews that can be used to cease benefits of in-payment beneficiaries.

Before Mandatory FY 2014 Anti-fraud Training

Before FY 2014, mandatory anti-fraud training was not required of all SSA and DDS employees. Some fraud-related training was available on-demand through SSA's Intranet, and standardized fraud training was a segment in existing training courses for SSA front-line employees (and remained a part of the training as of 2015).²

The Agency teaches newly hired, front-line employees the importance of fraud awareness and anti-fraud efforts in their basic training (see Appendix D for additional information). SSA tests employees during basic training and the employees receive certification when it is completed. Specifically, fraud awareness training is part of the following front-line position basic training curricula.

- *Core* training, provided to newly-hired and newly-promoted service and claims representatives (CR), contains an objective of the Agency's program integrity efforts, which focuses on attempts to abuse and defraud the programs SSA administers. It states "The [SSA field office] is absolutely vital to the continuing integrity and responsible stewardship of our programs."³ The training describes the effort as having four parts: detection, investigation, prosecution, and deterrence.
- *Basic CR* training, provided to newly-hired CRs and newly-promoted service representatives and CRs, and specific to the administration of Title II (Retirement, Survivors, and Disability Insurance benefits) and Title XVI (Supplemental Security Income) payments. Training for Title XVI CRs includes 4 hours of anti-fraud training, and training for Title II CRs includes 8 hours of anti-fraud training.
- *CR Crossover* training is for experienced Title II specialists to learn Title XVI and for Title XVI specialists to learn Title II. For Title II CRs learning Title XVI, the module on program violations is optional but "highly recommended." For Title XVI CRs learning Title II, the training includes activities and exercises, and has the following objectives.
 - ✓ Define violations of the *Social Security Act*.
 - ✓ Detect SSA program violations.
 - ✓ Collect appropriate evidence to aid in fraud investigations.
 - ✓ Develop skills to interview tipsters, witnesses, and suspects.
 - ✓ Identify representative payee fraud.

² For the purposes of this report, we considered front-line employees to be those who have direct contact with the public; for example, Service Representatives and CRs, program service center employees who address benefit payment issues for the public, and disability examiners. We also considered regional management and support staff who oversee and support these positions as front-line, even though they may have limited contact with the public.

³ SSA, *Core Training for Claims Representatives and Service Representatives*, MOD-01, 2014-2, p. 58.

- *Title II and Title XVI Fundamentals* training presents a basic overview of the respective programs for employees whose duties do not involve the direct administration of Title II or XVI. Similar to the *Core* training module on fraud described above, it discusses SSA's program integrity goals and efforts and describes the role of various Agency components, such as field offices and payment service centers, the Regional Offices, the Quality Assurance Integrity offices, and the OIG.
- *Benefit Authorizer* and *Claims Authorizer* training for payment center and program service center employees presents the prevention of fraud, waste, and abuse as a service principle value in the Introduction/Expectation module of their respective curricula.
- *Disability Examiner Basic* training for DDS employees states in the Program Orientation module:

The integrity of the Social Security disability claims programs depends on the ability to recognize and identify potentially fraudulent claims, to take appropriate action, and where indicated, legal action. Such a policy acts as a deterrent to potential violators and assures the public of the integrity of the disability programs. Therefore, the importance of adequate development, documentation, and application of appropriate adjudicative criteria cannot be overemphasized, as these are the most effective deterrents to fraud and abuse. Whenever a disability examiner encounters any suspected violation and/or possible fraud situations [*sic*], he/she has an obligation to conform to the fraud deterrence policy of SSA.⁴

The training integrates fraud awareness and detection throughout the Basic Training curriculum and includes an objective on recognizing fraud and how it relates to DDS casework.

In addition, at the time of our review, SSA offered on-line anti-fraud training which included the following.

- *Fraud and Abuse Online Lesson* became available in March 2010. The objectives of this training are to identify possible fraud related to Social Security benefits and Supplemental Security Income payments, Social Security numbers, and Medicare.
- *Comprehensive Fraud Training*, from the Philadelphia Regional Anti-Fraud Committee, became available in August 2014. This training discusses various types of fraud, how to report it, and what may happen after it is reported. Talking points for managers to use to reinforce the training are provided. Versions of the training, ranging from 17 to 24-minutes, are available for
 - Teleservice centers,
 - Field offices,
 - Regional Offices of Quality Assurance, and

⁴ SSA, *Disability Examiner Basic Training Program*, Program Orientation DE-02, 2012-1, p. 56.

- Payment service centers.
- *Disability Determination Service Fraud Referral Video-on-Demand* became available in August 2009. This 43-minute training for DDS employees discusses reporting fraud and addresses factors that may indicate a high risk for fraud, potential fraud when third parties are involved in the claim process, and particular alleged impairments commonly associated with fraud.
- *CDI Fraud Referral Video-on-Demand* became available in August 2012. This 18-minute training covers the process of identifying and referring disability fraud for investigation, and offers tips for processing cases where fraud is an issue.
- *Reporting Program Fraud Video-on-Demand* became available in September 2008. This 21-minute training addresses types of actions that could indicate fraudulent activity and how to refer potential fraud to the OIG.

Before FY 2014 and continuing into 2015, some SSA components issued reminders and conducted formal and *ad hoc* training related to fraud awareness, detection, and reporting. For example,

- The “Think Twice First” campaign of monthly reminders for staff included fraud awareness and reporting as a topic in FYs 2012, 2013, 2014, and 2015;
- Some Regional Anti-fraud Committees produced newsletters for Agency staff that highlighted anti-fraud efforts, including real-life examples of fraud cases, and recognized employees who detected and reported fraud. For example, one newsletter reported that a DDS employee in Kentucky made four fraud referrals between August and December 2011 that resulted in program savings of over \$563,000.

In addition, the Office of Disability Adjudication and Review (ODAR) began a “See Something, Say Something” program in December 2013. The program encouraged ODAR employees to report suspicious activity to management or the OIG and established a special e-mailbox to receive reports of suspicious activity. Also, beginning in May 2014, ODAR’s Intranet home Webpage featured the component’s anti-fraud programs.

SSA Headquarters components also conducted anti-fraud training efforts. For example, the Office of General Counsel hired 14 new Fraud Prosecutors in 2014 and held a Fraud Prosecution Project Training Conference from September 30 through October 2, 2014, that provided in-house training for all 24 fraud prosecutors. In another example, beginning in 2014, the Office of Quality Review’s training for quality review staff increased the focus on fraud to make examiners more aware of fraud-related issues that DDS staff may have overlooked.

Further, we conduct *ad hoc* training sessions for SSA and DDS employees. Specifically, we provided over 780 presentations on anti-fraud awareness to Agency employees nationwide from October 3, 2011 through April 2, 2015. In addition, the Inspector General (or his designee) speaks annually to DDS employees regarding fraud at the National Association of Disability Examiners’ training conference. See Appendix E for OIG anti-fraud outreach efforts within the Agency and DDSs.

2. Who participated in anti-fraud training and how did participation differ in FY 2014 versus previous years?

According to the Agency, all DDS and SSA employees participated in mandatory anti-fraud training in 2014. SSA had over 62,000 employees, and DDSs had over 16,000 employees in 2014.⁵ All OIG employees received the mandatory 2014 anti-fraud training. However, we did not independently verify that every SSA and DDS employee received the training. SSA stated

The agency practice for certifying the completion of mandatory training, including the 2014 Anti-Fraud training, is accomplished at the Deputy Commissioner level. Agency practice requires each Deputy Commissioner level component to respond to the Office of Learning via email, or the agency control system . . . to certify that all of their employees completed the mandatory training event.

SSA informed us that 20,841 employees completed the training through the Agency's online Learning Management System (SSA LMS) training system and through Employees-with-Disabilities software. The remaining employees received the training through SSA's Video on Demand or Interactive Video Teletraining. The Agency does not use these to track who completes training because technical data for both media may not reflect the actual number of employees who receive the training. For example, multiple employees can view a single Interactive Video Teletraining broadcast as part of a class or in a staff meeting.

This differed from prior years in that mandatory anti-fraud training was not required of all SSA and DDS employees. (As noted under Question 1, front-line employees receive fraud awareness training as part of their basic training.) In addition to anti-fraud training, SSA has policies and procedures for all its employees on how to detect and report potential fraud (see Appendix F).

3. How is participation in anti-fraud training tracked at SSA and DDSs?

The Agency tracked some anti-fraud training through SSA LMS and its online Employees-with-Disabilities software. However, training viewed through Video on Demand and Interactive Video Teletraining did not specifically track which employees participated in the training. Also, SSA Headquarters did not always centrally track attendance at various component training sessions, local *ad hoc* training, and presentations by specialists, such as OIG Office of Investigations agents. However, individual components may have recorded who received certain *ad hoc* training. Agency component and regional Intranet Webpages did not track who accessed the resources or viewed the training they offered.⁶

⁵ SSA, *Annual Statistical Supplement, 2014*, Table 2.F3. SSA, Office of Disability Determinations, Disability Management Information Reports, National DDS Performance Summary.

⁶ Many SSA components maintain their own Intranet Webpages, as does each of the 10 SSA regions. Some of these pages offer links to anti-fraud training and resources. See Appendix G for examples.

In addition, SSA generally does not track *ad hoc* training for DDS employees because they are State employees, not SSA employees.

4. Did all front-line employees of both SSA and DDSs receive formal anti-fraud training, and how was participation confirmed?

As stated under Question 2, in FY 2014, the Agency required mandatory anti-fraud training for all SSA and DDS employees, which it began offering in September 2014. The Agency required management certification of employee completion of the training at the Deputy Commissioner level of each component, including to the Deputy Commissioner for Operations for DDS employees. The Agency relied on each Deputy Commissioner component to verify in writing that all employees completed mandatory training.

Also, as noted under Question 1, anti-fraud training is part of SSA and DDS front-line employees' basic training.

5. How does SSA determine the effectiveness of the anti-fraud training?

The Agency requested feedback from students for the formal training it provided. Online training concluded with a survey for the student to provide feedback on the training and suggestions to improve it. The Agency stated it considered and used responses and suggestions from students to improve the training. The trainers also self-evaluated the content to identify ways to improve it.

6. Did experts in fraud and investigations, such as CDI unit members, participate in the training?

We provided input into the mandatory 2014 anti-fraud training required of all SSA and DDS employees and provided *ad hoc* training to Agency employees.

SSA employees who had held front-line positions before they were assigned to CDI units received anti-fraud training at the beginning of their basic job training. OIG Office of Investigations agents who supervise CDI units also received training related to fraud detection and investigation. In addition, Agency employees who were CDI unit members were required to receive the Agency's FY 2014 anti-fraud training.⁷

⁷ CDI units are generally comprised of personnel from SSA, OIG, a DDS, and non-Agency law enforcement. CDI unit members who were not SSA employees were not required to receive SSA's FY 2014 mandatory anti-fraud training.

7. Are current metrics SSA uses to evaluate anti-fraud training appropriate? What are other ways to determine effectiveness of the training?

SSA used appropriate methods to evaluate some of its anti-fraud training. According to an April 2015 article in *The Fraud Examiner*—a publication of the Association of Certified Fraud Examiners,⁸ the four levels of evaluation for effective fraud training include the following.

- *Reaction – How did the students react to the training?* For formal training through Video on Demand and Interactive Video Teletraining, SSA offered a feedback survey for students. Basic training for front-line positions provides the opportunity for formal and informal feedback. *Ad hoc* training offered by Agency components, and by OIG, did not necessarily provide for such feedback.
- *Learning – How much did the student retain as a result of the training?* SSA generally did not assess this for *ad hoc* anti-fraud training. However, basic training for front-line positions, which includes fraud awareness training, tests students on the material.
- *Behavior – Did students change their behavior as a result of the training?* SSA did not have a process in place to measure directly the effect of anti-fraud training. However, both SSA and the OIG report the number of fraud allegations received from employees, see Table 1.
- *Results – What kind of benefits did the organization experience as a result of the training?* SSA did not have a process in place to measure directly the effect of anti-fraud training. The Agency reports anti-fraud activities annually in its *Agency Financial Report* (AFR). Specifically, SSA's FY 2014 AFR shows the number of fraud allegations by category, the disposition of fraud cases, and the source of fraud allegations (see Appendix H). However, the Agency does not have a baseline estimate of the amount of fraud in its programs against which to measure the effectiveness of its anti-fraud training.

Table 1 shows the number of fraud allegations referred by SSA employees.

⁸ Association of Certified Fraud Examiners, *The Fraud Examiner*, Developing an Anti-Fraud Training Program, Mark Scott, April 2015.

Table 1: Fraud Allegations⁹

	FY 2012	FY 2013	FY 2014	FY 2015 (as of March)
All Allegations ¹⁰	135,235	141,088	121,461	65,927
Allegations from SSA Employees	60,008	75,656	58,282	24,380
Portion of Allegations from SSA Employees	44%	54%	48%	37%
Number of full-time SSA Employees ¹¹	62,943	59,823	62,956	65,378

Below are examples of OIG fraud investigations undertaken based on referrals from SSA and DDS employees both before and after the mandatory anti-fraud training for all employees.

Before the Mandatory Training

- *Referral from SSA's Northeastern Program Service Center:* In October 2013, an individual who used his deceased mother's benefits for himself was sentenced to 10 months in Federal prison and ordered to pay restitution of \$168,830 to SSA.¹²
- *Referral from the Nebraska DDS:* In April 2014, a disability beneficiary who used another person's identity to conceal her work activity and who fraudulently collected benefits from the Nebraska Department of Health and Human services was sentenced to 36 months in prison. The plea agreement allows SSA to recover a loss of over \$56,800 and the Nebraska Department of Health and Human to recover over \$16,300 if the individual becomes entitled to benefits in the future.¹³

After the Mandatory Training

- *Referral from SSA's Salinas, California, Teleservice Center:* In November 2014, a former disability beneficiary who used an alias and fraudulently-obtained identification and Social Security cards to conceal his work activity was sentenced to 37 months in prison and ordered to repay \$190,279 to SSA.¹⁴

⁹ OIG, *Semiannual Reports to Congress* for the years specified in the Table. See also SSA, *AFRs* for FYs 2013 and 2014 under "Other Reporting Requirements" section and SSA's *Performance and Accountability Report* for FY 2012 under "Other Reporting Requirements" section.

¹⁰ We receive allegations from SSA employees, private citizens, law enforcement, beneficiaries, public agencies, etc.

¹¹ SSA, *Annual Statistical Supplement 2014*, Table 2.F.3. FY 2015 number of employees was provided to us by SSA during our review.

¹² SSA, *Component Report*, October 29, 2013, p. 15.

¹³ SSA, *Component Report*, May 13, 2014, pp. 17 – 18.

¹⁴ SSA, *Component Report*, December 2, 2014, p. 19.

- *Referral from SSA's Gloversville, New York, Field Office:* In May 2015, a husband and wife, both disability beneficiaries who owned and operated a business but concealed their work activity from SSA, were sentenced. One was sentenced to 18 months in prison and ordered to repay \$314,650 to SSA, and the other was sentenced to 3 years' probation and ordered to repay \$88,102 to the Agency.¹⁵

Although SSA evaluated the content and delivery of the training, it did not specifically determine whether the training made a difference in the overall anti-fraud effort. The Agency does report its anti-fraud activities in its annual AFR. See Appendix H for an excerpt of fraud information from SSA's FY 2014 AFR.

Additional considerations were as follows.

- **Overall program evaluation and update** – After presenting the training, some SSA training providers evaluated the training and material. The Office of Quality Review, for example, reassessed its training in 2014 and increased the focus on fraud.
- **Documentation** – The Agency tracked some formal anti-fraud training, but did not rely on it to ensure employee completion of the training because the training was available through multiple media, specifically SSA LMS, Video on Demand, and Interactive Video Teletraining. For the mandatory 2014 anti-fraud training, the Agency relied on each Deputy Commissioner component to verify that employees completed the training. Generally, the Agency relied on feedback from students and self-evaluation of the content and delivery of the training to determine the effectiveness of training sessions and specific training material. In some cases, SSA maintained records for *ad hoc* training.

SSA's anti-fraud awareness efforts contained several aspects considered effective by the Association of Certified Fraud Examiners and the consulting firm PricewaterhouseCoopers. These aspects included:

- Fraud awareness training should be an ongoing process that begins at the time of hiring and occurring periodically thereafter.¹⁶
 - ✓ SSA built fraud awareness into basic training curricula for front-line positions.
 - ✓ Several Agency components regularly reminded employees of fraud awareness.

¹⁵ SSA, *Component Report*, May 19, 2015, p. 14.

¹⁶ Association of Certified Fraud Examiners, *Designing an Effective Anti-Fraud Training Program*, 2012; PricewaterhouseCoopers, *Key Elements of Antifraud Programs and Controls – A White Paper*, 2003.

- Ongoing communication¹⁷ and frequent exposure to anti-fraud topics to ensure employees absorb and apply the information provided. Employees should also participate in refresher training at least annually.¹⁸
 - ✓ SSA used multiple methods to remind employees of fraud awareness, including memorandums from management, Regional Anti-fraud Committee newsletters, and the *Good Morning SSA* video.
 - ✓ The Agency required anti-fraud training of all SSA and DDS employees in FY 2015, as it did in FY 2014. The FY 2015 training is about 30 minutes and must be completed by September 30, 2015. The Agency stated it used feedback from the 2014 training in developing the 2015 training.
- Training based on the realities of the organization rather than on generic anti-fraud messages.¹⁹
 - ✓ The Agency used examples and case studies in basic training fraud awareness curricula.
 - ✓ Regional anti-fraud newsletters described real-life cases of fraud investigation and prosecution.
- Setting an anti-fraud “tone at the top” of the organization.²⁰
 - ✓ The Agency convened a National Anti-Fraud Conference in September 2014 attended by the Acting Commissioner, Deputy Commissioners, Inspector General, and SSA Regional Commissioners.
 - ✓ The Acting Commissioner highlighted Agency anti-fraud efforts in her March 2015 “virtual town hall meeting” viewed by more than 27,000 staff.

In addition, many of SSA’s practices conform to the Government Accountability Office’s Fraud Risk Management Framework, including

- ✓ Requiring employees to attend training upon hiring and on an ongoing basis thereafter;
- ✓ Collaborating with the OIG when planning or conducting training; and

¹⁷ Id.

¹⁸ Association of Certified Fraud Examiners, *Designing an Effective Anti-Fraud Training Program*, 2012.

¹⁹ Id.

²⁰ PricewaterhouseCoopers, *Key Elements of Antifraud Programs and Controls – A White Paper*, 2003.

- ✓ Using multiple methods to educate employees and reinforce key anti-fraud messages; for example, using newsletters to highlight information from the results of cases or information on fraud schemes, and using computer-based trainings that are available on-demand to employees.²¹

CONCLUSIONS

Beginning in 2014, the Agency required standardized national anti-fraud training of all SSA and DDS employees. This training was an addition to existing anti-fraud training for new front-line employees and *ad hoc* training offered by both SSA and OIG.

SSA's anti-fraud training aligned with some best practices for anti-fraud training as recommended by both the private and the public sector. However, since the Agency does not have baseline metrics, it cannot determine the impact of the anti-fraud training.



Steven L. Schaeffer
Assistant Inspector General for Audit

²¹ GAO, *A Framework for Managing Fraud Risks in Federal Programs* (GAO-15-593SP), July 2015, pp. 42 – 43.

APPENDICES

Appendix A – CONGRESSIONAL REQUEST

COMMITTEE ON WAYS AND MEANS

U.S. HOUSE OF REPRESENTATIVES
WASHINGTON, DC 20515

February 24, 2015

The Honorable Mr. Patrick P. O'Carroll, Jr.
Inspector General
Social Security Administration
Altmeyer Building, Suite 300
6401 Security Boulevard
Baltimore, Maryland 21235

Dear Mr. O'Carroll:

As you know, in response to recent events in New York City and Puerto Rico, at a Subcommittee hearing on January 16, 2014, I asked the Acting Commissioner to detail her plan to stop fraud in the Disability Insurance program. The Acting Commissioner has highlighted the role of front-line employees and the importance of the anti-fraud training the Social Security Administration (SSA) provides. In particular, as part of the Acting Commissioner's plan, she pledged to expand training to all SSA employees during Fiscal Year (FY) 2014, with an emphasis on lessons learned from the New York City and Puerto Rico scams.

The Subcommittee knows well-trained employees are critical to spotting potential fraud before a single dollar in benefits is paid. Accordingly, I am requesting a review of the SSA's anti-fraud training initiatives, specifically comparing FY 2014 to the previous fiscal years, in order to determine effectiveness of this initiative of the anti-fraud plan. Specifically, I would like to know:

- What anti-fraud training has been done at the SSA and the Disability Determination Services (DDSs) and how was the FY 2014 training different from previous years?
- Who participated in anti-fraud training (i.e., all employees, front-line employees, disability examiners, etc.) and how did participation differ in FY 2014 versus previous years?
- How is participation in anti-fraud training tracked at the SSA and the DDSs?
- Did all front-line employees of both the SSA and DDSs receive formal anti-fraud training and how was participation confirmed?
- How does the SSA determine the effectiveness of the anti-fraud training?
- Did experts in fraud and investigations, such as Cooperative Disability Investigative unit members, participate in the training?
- Are current metrics the SSA uses to evaluate anti-fraud training appropriate? What are other ways to determine effectiveness of the training?

Committee on Ways and Means
Subcommittee on Social Security
February 24, 2015
Page 2

Thank you for your assistance in this important matter. Should you or your staff have any questions, please contact Ted McCann, Subcommittee Staff Director at (202) 225-9263.

Sincerely,



SAM JOHNSON
Chairman
Subcommittee on Social Security

Appendix B – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed Social Security Administration (SSA) basic training material.
- Reviewed SSA training records provided by the Office of Learning.
- Reviewed anti-fraud training and resource material available to front-line employees on SSA's Intranet.
- Obtained information about SSA component and *ad hoc* anti-fraud training.
- Obtained information about Office of the Inspector General anti-fraud presentations to SSA and disability determination services staff.
- Researched best practices for evaluating anti-fraud training.

We conducted our review from March through August 2015 in Boston, Massachusetts. The principal entity reviewed was the Office of Learning under the Office of the Deputy Commissioner for Human Resources. We conducted our review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

Appendix C – 2014 MANDATORY ANTI-FRAUD TRAINING




SOCIAL SECURITY Office of Human Resources


MEMORANDUM

Date: September 15, 2014

Refer To: 20140915-189

To: See Below

From: 
Reginald F. Wells
Deputy Commissioner
for Human Resources

Pete Spencer 
Deputy Commissioner
for Budget, Finance, Quality and Management

Subject: Mandatory Agency Anti-Fraud Overview Training--ACTION

ACTION REQUESTED BY: October 31, 2014

We are pleased to announce SSA's *Anti-Fraud Overview* training, which will broadcast live on September 17, 2014 at 8:00 a.m., 9:00 a.m., 10:00 a.m., 11:00 a.m., and 2:00 p.m. Eastern Standard Time. The training will also be available in the Video on Demand library by September 22, 2014 at 8:00 a.m. To assist components in maintaining a record of completion, we encourage employees to access the training via the Learning Management System (LMS) and certify that they viewed it. This training is mandatory for all SSA and Disability Determination Services employees and supports the agency's efforts to detect and prevent fraud, waste, and abuse. Although fraud detection is not new to the agency, this broadcast will provide a general overview of the agency's efforts and strategies for identifying and reporting potential fraud.

ADDRESSEES:

Deputy Commissioner for Communications
Deputy Commissioner for Disability Adjudication and Review
Acting Deputy Commissioner for Legislation and Congressional Affairs
Deputy Commissioner for Operations
Acting Deputy Commissioner for Retirement and Disability Policy
Deputy Commissioner for Systems
Chief Actuary
Chief Strategic Officer
General Counsel
Inspector General

Please share this information with your employees and ensure they complete this mandatory training by **October 31, 2014**. We also ask that you encourage your employees to complete the evaluation at the end of the training, as their feedback will assist us in improving and enhancing future training activities.

Staff may contact Melissa Boyd at Melissa.Boyd@ssa.gov or 410-966-6536 with questions or concerns regarding SSA's *Anti-Fraud Overview* training. Thanks for your cooperation.

cc:
The Acting Commissioner
Chief of Staff
Executive Secretary
Acting Assistant Deputy Commissioner for Human Resources
Deputy Commissioner-level Executive Officers

Appendix D – FRAUD TRAINING FOR FRONT-LINE EMPLOYEES

Social Security Administration (SSA) front-line employees receive fraud-awareness training as part of their basic training when newly hired or promoted to a front-line position. Claims representatives (CR) receive the most extensive lesson on fraud. For other front-line positions, anti-fraud lessons are shorter in length or integrated into other lesson material.

Claims Representative Basic Training modules on fraud contain case examples, exercises, and links to helpful anti-fraud-related resources, such as fraud development best practices, the Office of the Inspector General, and the Federal Trade Commission identity theft website.

The Basic Training lesson objectives for the 4-hour Title XVI CR lesson on fraud are listed below.¹

1. Provide an overview of assessing penalties.
2. Identify violations of the *Social Security Act* and understand administrative sanctions.
3. Detect and develop SSA program violations.
4. Understand the procedure for reporting program violations.
5. Collect appropriate evidence to aid in fraud investigations.
6. Develop skills to interview tipsters, witnesses, and suspects.

The basic training lesson objectives for the 8-hour Title II CR lesson on fraud are similar but include an additional objective:² “Follow procedural steps when misuse of funds by representative payees is involved.”

In addition to basic training, front-line employees—and employees Agency-wide—can access training and other anti-fraud resources available on SSA’s Intranet. Periodic reminders, such as the “Think Twice First” campaign, include fraud awareness items.

Figure D–1 shows the lesson plan, background, and rationale for Title II CR Basic Training on fraud.

¹ SSA, *Title XVI Basic Training*, 2014-2, MOD-10, / CH-03, p. 5.

² SSA, *Title II Claims Representative Basic Training*, 2015-1, MOD-35, / CH-01, p. 5.

Figure D–1: Excerpt from the Title II Basic Training Lesson on Fraud

FRAUD

MOD-35 / CH-01

LESSON PLAN

Module Objectives

At the completion of this module, the students will be able to:

1. Identify violations of the Social Security Act and understand administrative sanctions.
2. Provide an overview of assessing penalties.
3. Detect and develop SSA program violations.
4. Collect appropriate evidence to aid in fraud investigations.
5. Understand the procedure for reporting program violations.
6. Develop skills to interview tipsters, witnesses, and suspects.
7. Follow procedural steps when misuse of funds by representative payees is involved.

Length of Module

8 hours

Forms

SSA-795 Statement of Claimant or Other Person

SSA-5002 Report of Contact

Helpful Resources

[Fraud Development Best Practices](#)

[Fraud Referral and Overpayment Processing for FOs](#)

[SSA e8551](#) – Reporting Form for Programmatic Fraud

Helpful Links

[SSA Office of the Inspector General Website](#)

[Cooperative Disability Investigations \(CDI\) Website](#)

[OIG Hotline to Report Fraud, Waste, or Abuse](#)

[Federal Trade Commission Identity Theft Website](#)

[Federal Bureau of Investigation \(FBI\)](#)

[United States Postal Service \(USPS\) - Law Enforcement and Security](#)

[Department of Health and Human Services Office of Inspector General](#)

BACKGROUND AND RATIONALE

Overview

In November 2009, President Barack Obama signed Executive Order 13520, which directs all Federal agencies to reduce improper payments and eliminate waste in Federal programs. The SSA Operations Alignment Statement lists "prevention of waste, fraud, and abuse" as a core Agency Service Principle. It is our duty as SSA employees to prevent improper payments and protect the Social Security Trust Fund. An integral part of this obligation is the ability of all SSA employees to identify potential program violations and to assist the Office of the Inspector General (OIG) in the investigation of criminal violations.

This program integrity effort consists of:

- Detecting and preventing attempts to defraud the programs SSA administers;
- Detecting and preventing violations of the Social Security Act and other laws;
- Reporting suspected violations to the Office of the Inspector General;
- Publicizing successfully prosecuted cases in the news media; and
- Deterring fraud through awareness and informational activities.

All SSA employees are responsible for:

- Detecting and reporting potential violations of the Social Security Act and other laws;
- Developing sufficient evidence to establish that a program violation may have occurred;
- Reporting violations to the appropriate authorities;
- Assisting OIG (Office of the Inspector General) and OIFD (Office of Investigations Field Divisions) in the development of violations; and
- Providing testimony and other support as needed for the investigations of SSA Program violations.

As part of the effort to maintain program integrity, we are responsible for informing all applicants and beneficiaries of their reporting responsibilities as discussed in previous modules. Additionally, we must explain the consequences of failure to report changes in a timely fashion, as well as be alert for potential fraud or similar fault.

This chapter will prepare claims representatives to provide thorough information about the possible results for failure to report and apply penalties as necessary. It will also equip CRs with tools and methods to identify fraud, properly document and develop fraud cases, and conduct an interview when potential fraud is involved.

Appendix E – OFFICE OF THE INSPECTOR GENERAL

ANTI-FRAUD OUTREACH

The Social Security Administration's (SSA) Office of the Inspector General (OIG) conducted anti-fraud presentations nationwide in each of the Agency's regions. Between October 3, 2011 and April 2, 2015, OIG provided over 780 fraud-related presentations to front-line employees, including regional management overseeing field office, payment service center, and disability determination services (DDS) employees. Examples are below.

Boston Region

- Conducted 18 fraud awareness presentations in Fiscal Year (FY) 2013, 22 in FY 2014, and 6 through the second quarter of FY 2015, including
 - A presentation on fraud to SSA's Office of Quality Performance employees in Boston in June 2012.

New York Region

- Conducted 20 fraud awareness presentations in FY 2014, and 24 through the second quarter of FY 2015, including
 - A presentation on a large New York disability fraud investigation to the Albany, New York, Office of Disability Adjudication and Review (ODAR) in March 2015.

Philadelphia Region

- Conducted 19 fraud awareness presentations in FY 2014, and 55 through the second quarter of FY 2015, including
 - Presentations on third-party facilitators of fraud, including to nine ODAR offices located in Pennsylvania, Delaware, and the District of Columbia.

Atlanta Region

- Conducted 18 fraud awareness presentations in FY 2014, and 41 through the second quarter of FY 2015, including
 - February 2015 presentations to newly-hired DDS employees in Frankfort and Louisville, Kentucky.

Chicago Region

- Conducted 45 fraud awareness presentations in FY 2012, 30 in FY 2013, 36 in FY 2014, and 45 through the second quarter of FY 2015, including
 - Presentations in December 2011 and April 2013 on Internet-related fraud.

Dallas Region

- Conducted 56 fraud awareness presentations in FY 2012, 55 in FY 2013, 82 in FY 2014, and 16 through April 2, 2015, including
 - A September 2012 presentation in Dallas, Texas, to new management employees.

Kansas City Region

- Conducted 20 fraud awareness presentations in FY 2014, and 20 through the second quarter of FY 2015, including
 - A presentation in March 2014 at the Wichita, Kansas field office on how to improve the quality and number of fraud referrals to OIG.

Denver Region

- Conducted 14 fraud awareness presentations in FY 2014, and 10 through the second quarter of FY 2015, including
 - A presentation at the Aurora DDS in December 2013 on the mission of the Cooperative Disability Investigations (CDI) unit and the allegation referral process.

San Francisco Region

- Conducted 36 fraud awareness presentations in FY 2014, and 23 through the second quarter of FY 2015, including
 - Presentations to Supplemental Security Income specialists at two field offices on fraud related to foreign residency travel.

Seattle Region

- Conducted 7 fraud awareness presentations in FY 2012, 20 in FY 2013, 26 in FY 2014, and 20 through April 2, 2015, including
 - A November 2013 presentation to new DDS analysts on the OIG Office of Investigations and the CDI unit.

OIG Headquarters Staff

- Delivered an October 2014 presentation on fraud investigation processes and case highlights at the U.S. Embassy in Guatemala to SSA representatives and consular fraud prevention staff.

Appendix F – SSA POLICY CHAPTERS ON FRAUD

Below is a partial list of the Social Security Administration's (SSA) policy chapters on fraud.

Table F–1: SSA Policy Chapters on Fraud

Policy Chapter	Topic
GN 04101.005	Program Integrity - Introduction
GN 04101.010	SSA Program Integrity Responsibilities
GN 04105.005	Violations of the Social Security Act
GN 04110.005	Detecting Potential Criminal Violations and Fraud
GN 04110.010	Detecting and Developing Program Fraud
GN 04111.005	Reporting Guidelines for Program Violations
GN 04111.010	How the Field Office Reports Program Violations
GN 04111.015	How the Field Office Handles Non-Routine Requests for Assistance from the Office of Investigations Field Division
GN 04111.020	How the Teleservice Center Reports Program Violations
GN 04111.025	How the Processing Center Reports Program Violations
GN 04111.030	How the Office of Quality Review Reports Program Violations
GN 04111.035	How the Disability Determination Services Report Program Violations
GN 04111.040	How the Office of Disability Adjudication and Review Reports Program Violations
GN 04111.045	How Central Office Components Report Program Violations
GN 04111.050	How Regional Office and Area Director Components Report Program Violations
GN 04111.055	Reporting New Events to the Office of Investigations Field Division
GN 04111.060	Establishment of a Program Integrity File
GN 04111.065	Preparation of the Electronic Form SSA-8551 (e8551)
GN 04112.005	Reporting Employee Criminal Violations -- General
GN 04112.015	How Employees Report Employee Criminal Violations
GN 04112.020	Follow-Up - Policy
GN 04115.005	Obtaining Evidence in the Development of Violations
GN 04115.010	Avoiding Common Mistakes in Development
GN 04115.020	Suspect Requests for Reconsideration or Hearing
GN 04115.030	Questionable or Suspicious Documents or Handwriting - Procedure
GN 04124.001	Referral of Potential Violation (e8551)
GN 04140.010	District Office Responsibility

Appendix G – EXAMPLES OF INTRANET RESOURCES

These are examples of Social Security Administration Regional Intranet Webpages that provided resources for the Agency’s anti-fraud efforts. Employees throughout the Agency can access these Webpages.¹

What's New | Find An Application | Search

CSI , Fraud and Abuse

Home Search this site...

Atlanta One-STOP > ORC > MOS > CSI

Fraud and Abuse

Administrative Sanctions VOD Administration Sanctions Refresher Training	International Fraudulent Bulletins
Anti-Fraud Award	National OIG Phone Directory
Anti-Fraud Newsletter	Quick Tips For Completing the e8551
Anti-Fraud Quick Links	Reporting Employee Related Fraud
Black Lights	Reporting Fraud OIG Hotline
Email Scams	Reporting Programmatic Fraud
Fact Sheets-Writers Guide	Scams and Fraud
Fraud Info Tracking System (FITS)	SPAM Managment WIKI Page
Atlanta OIG Organizational Chart	Title II Beneficiary Fraud Guide

Virtual CSI
CSI Mission
PII - Personally Identifiable Information
CSI SharePoint Site
CSI Resources
Management Resources
National Security Portal
DCO
Office of the Inspector General
Federal Protective Service
Homeland Security
U.S. Secret Service
Componet Directory - ATL
Component Directory - BHAM
Contact Us

¹ SSA Intranet, Atlanta and Kansas City Regions, as of July 21, 2015.



Detecting, Preventing, and Reporting Fraud and Abuse is Every Employee's Responsibility.



AMD Automated Response Screens

Anti-Fraud Guide

Cooperative Disability Investigation (CDI) Units

FBI - Common Fraud Schemes

[FTC Identity Theft Site](#)

[OEST Fraud Resources](#)

OEST MySocialSecurity Resource Kit

OIG Hotline 1/800-269-0271

[Office of the Inspector General - Public Site](#)

[Office of the Inspector General - SSA Site](#)

OIG Programs

POMS GN 041: Violations/Fraud

Preparing e8551 When Third Party Involved

[Program Fraud Referral Guide](#)

Dallas Anti-Fraud Coordinators

[Dallas OIG Office Directory](#)

[Dallas OIG Org Chart](#)

Dallas OIG Regional FO
Assignment

Kansas City Resources

Kansas City OIG Field Division Directory

Appendix H– SOCIAL SECURITY ADMINISTRATION FISCAL YEAR 2014 AGENCY FINANCIAL REPORT

The Social Security Administration reported agency anti-fraud activities in its Fiscal Year (FY) 2014 Agency Financial Report (AFR). In her introductory message of the AFR, the Acting Commissioner stated:

We remain committed to strengthening program integrity by providing the American taxpayer the maximum value for the resources entrusted to us. Our employees are our first line of defense. We will use every tool available to prevent and address waste, fraud, and abuse. Examples of initiatives that will help us maintain the public's trust include conducting continuing disability reviews and SSI [Supplemental Security Income] redeterminations and expanding our Cooperative Disability Investigation program.¹

The FY 2014 AFR contained information on the Agency's anti-fraud activities, including

- A Public Facing Integrity Review—a system developed in FY 2013 and enhanced in FY 2014 to identify unusual and potentially-fraudulent activity in the Agency's Internet applications;²
- The reinstitution of the National Anti-Fraud Committee—co-chaired by the Inspector General and the Deputy Commissioner for Budget, Finance, Quality, and Management to lead and support national and regional strategies to combat fraud, waste, and abuse;³ and
- An initiative to develop predictive analytics to detect disability fraud—a project using data analytics to uncover fraud.⁴

The AFR also included charts showing FY 2014 fraud allegations by category, the disposition of fraud cases, and the sources of fraud allegations, as shown in the Report excerpt at Figure H–1.

¹ SSA, *FY 2014 Agency Financial Report*, p. 1.

² *Id.* at p. 16.

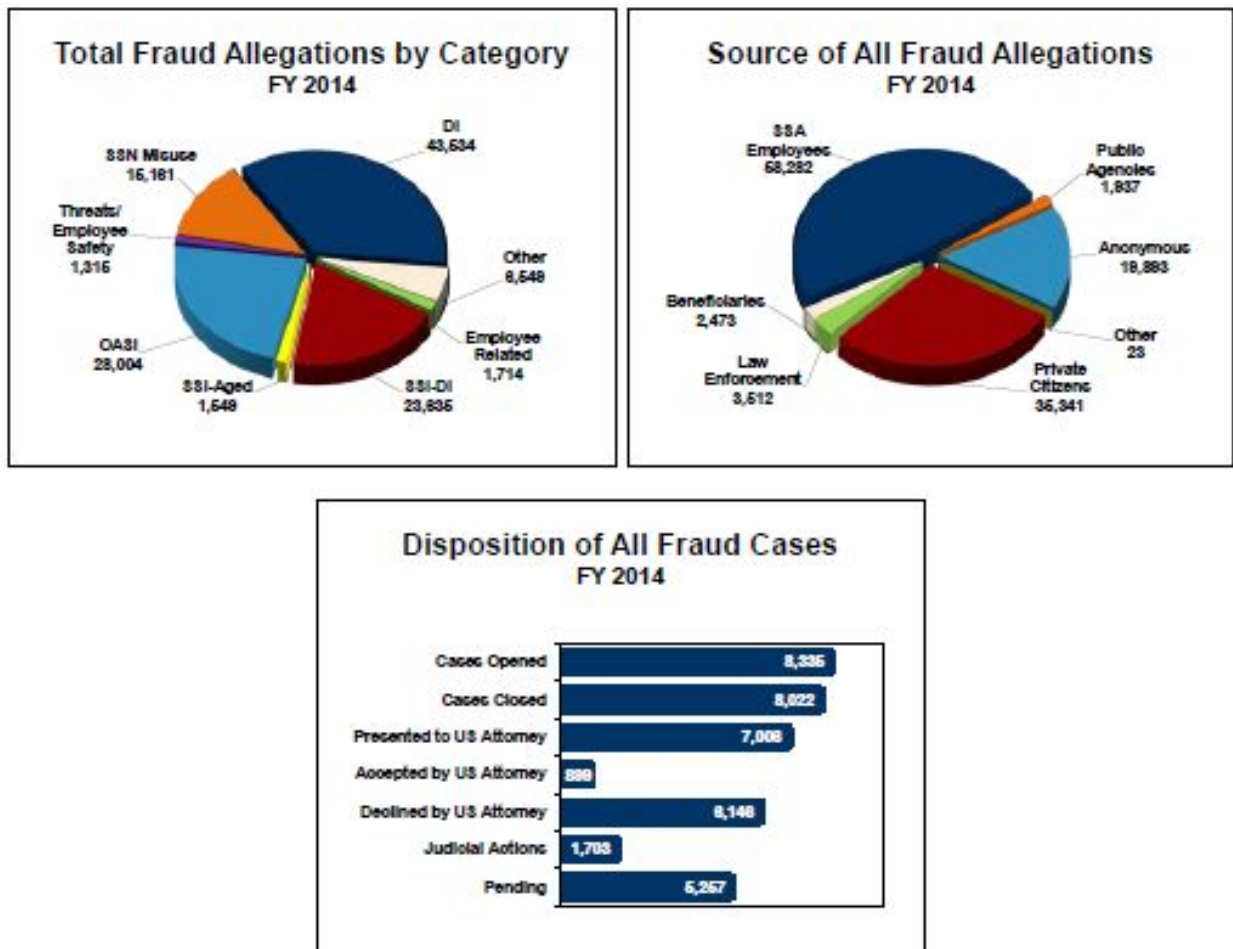
³ *Id.* at pp. 39 and 183.

⁴ *Id.* at p. 132

Figure H-1: Fiscal Year 2014 Total Fraud Allegations by Category, Disposition of All Fraud Cases, and Source of All Fraud Allegations⁵

THE OFFICE OF THE INSPECTOR GENERAL'S ANTI-FRAUD ACTIVITIES

In FY 2014, we worked with our Office of the Inspector General (OIG), the Department of Justice, and other Government agencies on cases involving fraud, waste, and abuse as part of our fraud detection and prevention program for safeguarding the agency's assets. The following charts provide information from our OIG concerning fraud.



⁵ Id. at p. 156.

Appendix I – MAJOR CONTRIBUTORS

Judith Oliveira, Director, Boston Audit Division

David Mazzola, Audit Manager

David York, Program Analyst

MISSION

By conducting independent and objective audits, evaluations, and investigations, the Office of the Inspector General (OIG) inspires public confidence in the integrity and security of the Social Security Administration's (SSA) programs and operations and protects them against fraud, waste, and abuse. We provide timely, useful, and reliable information and advice to Administration officials, Congress, and the public.

CONNECT WITH US

The OIG Website (<http://oig.ssa.gov/>) gives you access to a wealth of information about OIG. On our Website, you can report fraud as well as find the following.

- OIG news
- audit reports
- investigative summaries
- Semiannual Reports to Congress
- fraud advisories
- press releases
- congressional testimony
- an interactive blog, "[Beyond The Numbers](#)" where we welcome your comments

In addition, we provide these avenues of communication through our social media channels.



[Watch us on YouTube](#)



[Like us on Facebook](#)



[Follow us on Twitter](#)



[Subscribe to our RSS feeds or email updates](#)

OBTAIN COPIES OF AUDIT REPORTS

To obtain copies of our reports, visit our Website at <http://oig.ssa.gov/audits-and-investigations/audit-reports/all>. For notification of newly released reports, sign up for e-updates at <http://oig.ssa.gov/e-updates>.

REPORT FRAUD, WASTE, AND ABUSE

To report fraud, waste, and abuse, contact the Office of the Inspector General via

Website: <http://oig.ssa.gov/report-fraud-waste-or-abuse>

Mail: Social Security Fraud Hotline
P.O. Box 17785
Baltimore, Maryland 21235

FAX: 410-597-0118

Telephone: 1-800-269-0271 from 10:00 a.m. to 4:00 p.m. Eastern Standard Time

TTY: 1-866-501-2101 for the deaf or hard of hearing