

OIG

Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

*Audit Report*

Accuracy of Claimant Representative  
Fees Paid on Title XVI Claims

*A-04-13-13030 June 2015*

**OIG** Office of the Inspector General  
SOCIAL SECURITY ADMINISTRATION

**MEMORANDUM**

**Date:** June 17, 2015

**Refer To:**

**To:** The Commissioner

**From:** Inspector General

**Subject:** Accuracy of Claimant Representative Fees Paid on Title XVI Claims (A-04-13-13030)

The attached final report presents the results of our audit. Our objectives were to determine whether the Social Security Administration (1) withheld the claimant representative fee from claimants' past-due benefits and (2) paid the correct claimant representative fee when Title XVI claimants elected third-party representation.

If you wish to discuss the final report, please call me or have your staff contact Steven L. Schaeffer, Assistant Inspector General for Audit, at (410) 965-9700.



Patrick P. O'Carroll, Jr.

Attachment

# Accuracy of Claimant Representative Fees Paid on Title XVI Claims

## A-04-13-13030



June 2015

Office of Audit Report Summary

### Objectives

To determine whether the Social Security Administration (SSA) (1) withheld the claimant representative fee from claimants' past-due benefits and (2) paid the correct claimant representative fee when Title XVI claimants elected third-party representation.

### Background

The Supplemental Security Income program is administered under Title XVI of the *Social Security Act*. The basic purpose of Title XVI is to provide a minimum level of support to qualified individuals who are blind, disabled, or aged and who have limited income and resources. To assist with obtaining Title XVI payments, claimants may appoint a qualified representative (attorney or non-attorney) to act on their behalf in matters before SSA. Claimants may agree to compensate their appointed representative for services provided to resolve their claim.

Generally, SSA calculates claimant representative fees based on claimants' past-due benefits. Past-due benefits typically accrue from the claimant's benefit entitlement date through the month in which SSA approves the claim.

### Findings

For the 250 randomly sampled Title XVI claims involving claimant representative fees, SSA withheld fees from claimants' past-due benefits and paid the fees directly to the claimant representative. However, our review found that SSA did not always pay the appropriate amount when it paid the claimant representative fee on concurrent Title II and XVI claims. As a result, when SSA overpaid the claimant representative, it generally underpaid the claimant. Similarly, when SSA underpaid the claimant representative, it generally overpaid the claimant.

Of the 250 sample claimant representative fees, 10 (4 percent) had claimant fee payment errors totaling \$13,020: \$12,479 in overpayments and \$541 in underpayments. The payments ranged from a \$3,062 overpayment to a \$484 underpayment. Based on our results, we estimate that 15,200 claimant representative fee payments had about \$19.8 million in payment errors for Calendar Years 2011 and 2012.

We acknowledge that computing past-due benefits and the related claimant representative fees may be complex, as staff is required to analyze a multitude of factors and make various decisions to pay the past-due benefits and fee. However, the payment accuracy of past-due benefits and claimant representative fees depends on decisions and actions staff take to process these types of claims.

### Recommendations

1. Provide additional training to ensure employees correctly process the claimant representative fee.
2. Work the 10 error cases we identified and make claimants and representatives whole, and once completed, determine whether it is cost-effective to review and work the remaining cases in our audit population.

SSA agreed with our recommendations.

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## **ABBREVIATIONS**

C.F.R.	Code of Federal Regulations
CY	Calendar Year
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
U.S.C.	United States Code

## OBJECTIVES

Our objectives were to determine whether the Social Security Administration (SSA) (1) withheld the claimant representative fee from claimants' past-due benefits and (2) paid the correct claimant representative fee when Title XVI claimants elected third-party representation.

## BACKGROUND

SSA administers the Supplemental Security Income program under Title XVI of the *Social Security Act*.<sup>1</sup> Title XVI provides a minimum level of income to financially needy individuals who are aged, blind, or disabled.<sup>2</sup> Claimants may appoint a qualified representative (attorney or non-attorney) to act on their behalf in obtaining Title XVI payments. Claimants may agree to compensate their appointed representative for services they provided to resolve the claim.

Generally, SSA calculates claimant representative fees based on claimants' past-due (retroactive) benefits. Past-due benefits typically accrue from the claimant's benefit entitlement date through the month in which SSA approves the claim. For example, a claimant applied for Title XVI disability payments on January 1, 2014, and SSA processed the final actions to pay benefits on July 31, 2014. SSA determined the claimant became entitled to benefits beginning February 2014—the month after the claimant applied for Title XVI disability benefits. As such, the claimant accrued 6 months of past-due benefits from February through July 2014.

Individuals may be eligible for disability benefits under Title II<sup>3</sup> and XVI simultaneously. SSA uses the term “concurrent” to describe persons who are eligible for disability benefits under both programs.<sup>4</sup> When a claimant is concurrently eligible for Title II and XVI benefits, SSA first pays the Title II benefit amount and then the Title XVI benefit amount after reducing it by the Title II benefit.

For most claims, SSA's systems automatically calculate and pay the claimant representative fee. However, in certain situations, SSA must manually calculate the claimant representative fee.

A claimant representative may request a fee for representing a claimant before SSA by filing a fee agreement or fee petition. For both processes, SSA determines the maximum fee a representative may charge for services.

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<sup>1</sup> *Social Security Act* § 1601 et seq., 42 U.S.C. § 1381 et seq.; see also 20 C.F.R. § 416.101 et seq.

<sup>2</sup> *Social Security Act* § 1602, 42 U.S.C. § 1381a; see also 20 C.F.R. § 416.110.

<sup>3</sup> SSA administers the Old-Age, Survivors and Disability Insurance program under Title II of the *Social Security Act*, as amended. The Title II program provides monthly benefits to disabled individuals, qualified retirees, and survivors as well as their eligible dependents. *Social Security Act* §§ 202 and 223, 42 U.S.C. §§ 402 and 423.

<sup>4</sup> SSA, *2015 Red Book*, Publication No. 64-030, January 2015, p. 7.

- Under a fee agreement, the maximum fee is the lesser of \$6,000 or 25 percent of past-due benefits.
- Under a fee petition, the maximum fee is a “reasonable fee” determined by SSA. The “reasonable fee” is based on several factors and, unlike a fee agreement, may exceed \$6,000.

A claimant representative may also be eligible for direct payment. That is, SSA will withhold the claimant representative fee from the claimant’s benefits and issue payment directly to the claimant representative. To recover administrative costs for paying fees directly to claimant representatives, SSA charges an assessment or user fee. The user fee is the lower of a flat fee or a percentage applied to the total fee. For our audit period, the fees and rates were as follows.

- Effective December 1, 2008, the user fee was \$83 and rate was 6.3 percent.
- Effective December 1, 2011, the user fee was \$86 and rate was 6.3 percent.
- Effective December 1, 2012, the user fee was \$88 and rate was 6.3 percent.<sup>5</sup>

In previous reviews, we found that claimant representative fees had payment errors. For example, in our report on *Claimant Representative Fees Paid Through the Social Security Administration’s One-Time Payment System*, we found that 95 (38 percent) of 250 randomly sampled Title XVI claimant representative fees had payment errors totaling \$68,532.<sup>6</sup> In another review, we found that SSA did not always withhold claimant representative fees when paying past-due Disability Insurance benefits and therefore overpaid beneficiaries.<sup>7</sup>

To accomplish our objectives, we identified a population of 380,003 Title XVI claimant representative fee payments for Calendar Years (CY) 2011 and 2012. We randomly selected a sample of 250 claimant representative fees for our audit tests. SSA paid all 250 claimant representative fees via direct payment to the claimant representatives. Of the 250 sampled claimant representative fees, 74 claimants received concurrent benefits. Accordingly, we tested the accuracy of Title II claimant representative fees and found no errors. We deemed a claimant representative fee a reportable error when the fee payment error was equal to, or greater than, 1 percent of the claimant representative fee for underpayments and equal to, or greater than, 3 percent for overpayments. See Appendix A for our complete scope and methodology.

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<sup>5</sup> SSA, POMS GN 03920.019.A. (November 28, 2014).

<sup>6</sup> SSA OIG, *Claimant Representative Fees Paid Through the Social Security Administration’s One-Time Payment System* (A-04-10-11026), November 2010, p. 4.

<sup>7</sup> SSA OIG, *Claimant Representative Fees Paid but Not Withheld from Title II Past-Due Benefits* (A-04-11-11102), October 2012, p. 3.

## RESULTS OF REVIEW

For the 250 cases we reviewed, SSA withheld claimant representative fees from Title XVI claimants' past-due benefits. However, as shown in Table 1, 10 (4 percent) had payment errors totaling \$13,020 (\$12,479 in overpayments and \$541 in underpayments). The payment errors we identified resulted from errors staff made in processing claimant representative fees using both automated and manual calculations. Specifically, 7 of the 10 payment fee errors, totaling \$5,856, occurred when staff processed the fee using automated calculations. For the remaining three errors, totaling \$7,164, SSA staff manually computed the claimant representative fee. When SSA withholds claimant representative fees from claimants' past-due benefits and overpays the claimant representative, SSA generally underpays the claimant. Similarly, when SSA underpays the claimant representative, it generally overpays the claimant.

**Table 1: Summary of Sample Claimant Representative Fees in Error**

Claimant Representative Fee Error Cases	Number of Fee Errors	Total Fee Overpayments	Total Fee Underpayments	Total Fee Payment Errors
Automated Calculations	7	\$5,315	\$541	\$5,856
Manual Calculations	3	7,164	0	7,164
<b>Total</b>	<b>10</b>	<b>\$12,479</b>	<b>\$541</b>	<b>\$13,020</b>

Finally, as shown in Table 2, all of the payment errors involved concurrent Title II/XVI benefits. Additionally, while each case involved a windfall offset,<sup>8</sup> not all of the errors were due to the windfall-offset calculation.

**Table 2: Claimant Representative Sample Cases by Type of Benefit**

Benefit Type	Number of Sample Cases	Number of Errors
Title XVI	176	0
Concurrent Title II/XVI	74	10
<b>Total</b>	<b>250</b>	<b>10</b>

Based on our results, we estimate 15,200 claimant representative fees had payment errors, totaling about \$19.8 million, for CYs 2011 and 2012. See Appendix B for our sample results and projections.

<sup>8</sup> Windfall offset affects a claimant and couples who are concurrently entitled and due retroactive Title II and XVI benefits. Windfall offset prevents a claimant from receiving more benefits retroactively than he/she would have received had SSA paid all benefits in the months they were due. SSA, POMS GN 02610.005.A (May 4, 2012).

## Claimant Representative Fee Errors—Automated Calculations

For 7 of the 10 claimant representative fee payment errors, totaling \$5,856 (\$5,315 in overpayments and \$541 in underpayments), SSA’s records indicated that staff processed the fees using automated calculations. For these cases, the claimant representative fee errors occurred because staff made various processing errors. Specifically, the processing errors caused (1) incorrect windfall offset calculations used to derive fees, (2) fees to be paid that differed from the authorized fee amount, and (3) presumptive disability<sup>9</sup> benefit payments previously paid to the claimant to be included in the past-due benefit calculation. Moreover, although only two of the seven cases involved a windfall offset calculation error, those overpayments totaled \$3,156, 54 percent of the total claimant representative fee errors with automated calculations. Table 3 details the claimant representative fee payment errors we identified in the automated calculations.

**Table 3: Claimant Representative Fee Payment Errors—Automated Calculations**

Type of Claimant Representative Fee Error	Fee Error	Total Fee Payment Error
Windfall Offset	Overpayment	\$2,212
	Overpayment	944
<b>Subtotal</b>	<b>2</b>	<b>\$3,156</b>
Fee Paid Differed from Authorized Amount	Overpayment	\$1,032
	Underpayment	484
	Overpayment	315
	Underpayment	57
<b>Subtotal</b>	<b>4</b>	<b>\$1,888</b>
Presumptive Disability Benefits Not Considered	Overpayment	\$812
<b>Subtotal</b>	<b>1</b>	<b>\$812</b>
<b>Total</b>	<b>7</b>	<b>\$5,856</b>

Following are examples of claimant representative fee payment errors on automated fee calculations.

- On a concurrent claim involving windfall offset, SSA overpaid the claimant representative \$2,212. SSA paid a \$2,533 Title XVI claimant representative fee when it should have only

<sup>9</sup> A claimant, including a child, applying for Title XVI based on disability or blindness, may receive up to 6 months of payments before the final determination of disability or blindness if he/she is found to be presumptively disabled or blind and meets all other eligibility requirements. SSA, POMS DI 23535.001.A (July 31, 2014).

paid \$321. The error occurred because SSA calculated the Title XVI past-due benefits as if there were no Title II benefits payable. As such, SSA calculated the claimant representative fee on a Title XVI past-due benefit amount that it did not reduce for Title II benefits. According to SSA policy, to determine Title XVI claimant representative fees, SSA must reduce Title XVI past-due benefits based on concurrent Title II benefits payable (windfall offset).<sup>10</sup> SSA calculated this claimant representative fee based on a \$10,134 Title XVI past-due benefit amount, instead of the correct amount of \$1,286. This payment error resulted in SSA underpaying the claimant \$2,212.

- On the Title XVI portion of a concurrent claim, SSA overpaid the claimant representative \$315. SSA records indicated the claimant representative fee should have been \$1,011 based on past-due benefits of \$4,044. We agreed with SSA's claimant representative fee and past-due benefit amount calculations. However, SSA paid the claimant representative \$1,326. This payment error resulted in SSA underpaying the claimant \$315.

Even when a claim is automated, field office staff must manually input information into SSA's automated systems. For example, to process a fee agreement, SSA staff must

- determine whether automated or manual processing applies, and,
- if manual processing applies,
  - determine the amount of past-due benefits by examining automated records,
  - reduce Title XVI past-due benefits payable by any benefits and/or payments that are not considered past-due for claimant representative fee purposes,
  - authorize the fee, and
  - assess and record user fees.<sup>11</sup>

SSA policy does not always require that the claimant representative fee be re-computed and corrected once the fee has been authorized and the claimant representative and claimant have been notified of the fee amount.<sup>12</sup> According to SSA policy, if, after SSA authorizes a claimant representative fee, it obtains additional claimant income or resource information that results in adjustments to the past-due benefits used to compute the representative fee, SSA will not re-compute the fee. The representative fee errors we identified were due to processing errors and did not result from SSA obtaining additional claimant information that changed the past-due benefit amount.

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<sup>10</sup> SSA, POMS GN 03920.031 B.2 (July 16, 2012).

<sup>11</sup> SSA, POMS GN 03940.046.A.1 (January 10, 2013).

<sup>12</sup> After SSA notifies the claimant and claimant representative of the authorized fee amount, any increase or decrease in the amount of past-due benefits will not change the past-due withholding amount or authorized fee, with some exceptions. Further, SSA cannot adjust the past-due, benefit-withholding amount because it receives new information after fee authorization. For example, receipt of earnings information that affects the benefit computation. SSA, POMS GN 03920.040.A.1 (March 26, 2012).

## Claimant Representative Fee Errors—Manual Calculations

For 3 of the 10 representative fee payment errors, totaling \$7,164 in overpayments, SSA’s records indicated that staff manually calculated the representative fee. For these error cases, the representative fee errors occurred because SSA made incorrect windfall offset calculations.<sup>13</sup> Table 4 details the claimant representative fee errors we identified in manual representative fee calculations.

**Table 4: Claimant Representative Fee Payment Errors—Manual Calculations**

Type of Claimant Representative Fee Errors	Fee Error	Total Fee Payment Error
Windfall Offset	Overpayment	\$3,062
	Overpayment	2,560
	Overpayment	1,542
<b>Total</b>	<b>3</b>	<b>\$7,164</b>

Following is an example of the claimant representative fee payment errors on manual fee calculations.

- On a concurrent claim, SSA overpaid the claimant representative \$3,062. SSA staff manually calculated the Title XVI claimant representative fee based on \$12,581 in past-due benefits. However, when computing the fee, staff did not recognize that SSA had already paid the claimant representative the maximum fee allowable (\$6,000) on the claimant’s Title II past-due benefits.<sup>14</sup> SSA policy states that the maximum claimant representative fee also applies to concurrent Title II and XVI claims.<sup>15</sup> Because SSA withheld the \$3,062 fee from the claimant’s past-due benefits, the claimant is due \$3,062 from SSA for the underpaid Title XVI benefits.<sup>16</sup>

## CONCLUSION AND RECOMMENDATIONS

SSA did not always pay the correct claimant representative fee on concurrent Title II and XVI claims. As a result, we estimated that SSA’s payment errors totaled about \$19.8 million for CYs 2011 and 2012.

<sup>13</sup> While one error case involved multiple claimant representatives, this was not the cause of the error.

<sup>14</sup> SSA, POMS GN 03943.005.C.3 (July 10, 2009).

<sup>15</sup> SSA, POMS GN 03940.003.A.3 n.3 (September 3, 2013).

<sup>16</sup> Claimant died in May 2011, so SSA should pay the underpayment to the legal payee.

We acknowledge that computing past-due benefits and the related claimant representative fees may be complex, as staff is required to analyze a multitude of factors and make various decisions to pay the past-due benefits and fee. However, the payment accuracy of past-due benefits and claimant representative fees depends on actions staff take to process these types of claims.

Accordingly, we recommend SSA:

1. Provide additional training to ensure employees correctly process the claimant representative fee.
2. Work the 10 error cases we identified and make claimants and representatives whole, and once completed, determine whether it is cost-effective to review and work the remaining cases in our audit population.

## AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix C.

## OTHER MATTERS

### Subsequent Benefit Adjustments

SSA policy states that the Agency will not re-compute the claimant representative fee after it authorizes the fee amount and notifies the claimant and claimant representative of the fee amount, with certain exceptions.<sup>17</sup> Because of this policy, after SSA authorized the fee for 13 (5 percent) of the 250 sampled claimant representative fee payments, it took actions that adjusted the claimant's benefits, including the past-due benefit used to calculate the claimant representative fee. SSA adjusted the benefits because it obtained additional information about claimants' income and resources. However, SSA did not re-compute the claimant representative fees.

Because these claims involved SSA's appeals process and its hearing offices, the Agency had an opportunity to obtain claimants' complete income and resource information needed to determine eligibility, the benefit amount, and ultimately, the correct claimant representative fee. The recalculated claimant representative fee, based on SSA's adjusted past-due benefit amount, for these 13 cases would have changed by \$2,919 (\$1,443 in over- and \$1,476 in underpayments).

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<sup>17</sup> SSA, POMS GN 03920.040.A.1 (March 26, 2012).

## User Fees

SSA incorrectly applied the user fee when processing some claimant representative fees. For this review, we found that SSA paid the incorrect user fee for 5 (2 percent) of the 250 claimant representative fees we reviewed. SSA did not withhold the user fee, withheld the user fee twice from claimants' past-due benefits, or applied the incorrect user fee. In 2006, we reported SSA staff had erroneously recorded the user fee about 95 percent of the time.<sup>18</sup> Because SSA's error rate has significantly improved, we are not making recommendations on this matter in this report.

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<sup>18</sup> SSA OIG, *Controls Over Multiple Payments to Attorneys* (A-12-06-20016), September 2006, p. 6.

# *APPENDICES*

## Appendix A – SCOPE AND METHODOLOGY

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To accomplish our objective, we:

- Identified a population of 380,003 Supplemental Security Income (Title XVI)<sup>1</sup> claimant representative fee payments for Calendar Years 2011 and 2012.
- Randomly selected 250 records from the claimant representative fee population. Of the 250 sample claimant representative fees, 74 claimants received concurrent Title II<sup>2</sup> and XVI benefits, which resulted in our testing the accuracy of Title II representative fees.
  - For these sample cases, we queried and reviewed claimant representative fee information from the Social Security Administration's (SSA)
    - Master Beneficiary Record,
    - Payment History Update System,
    - Single Payment System, and
    - Supplemental Security Record.
- Re-calculated Title II claimant representative fees based on the benefit entitlement date, claim approval/decision date, and benefits payable.
- Deemed a claimant representative fee as a reportable error when the fee payment error was equal to, or greater than, 1 percent of the claimant representative fee for underpayments and equal to, or greater than, 3 percent for overpayments.
- Queried and reviewed payment information from the Treasury Check Information System for the sample cases.
- Interviewed SSA personnel to obtain an understanding of SSA procedures for calculating claimant representative fees.
- Reviewed applicable SSA policies and procedures that control payment of claimant representative fees.

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<sup>1</sup> SSA administers the Supplemental Security Income program under Title XVI of the *Social Security Act*. Title XVI provides a minimum level of income to financially needy individuals who are aged, blind, or disabled. *Social Security Act* § 1601 et seq., 42 U.S.C. § 1381 et seq.; see also 20 C.F.R. § 416.101 et seq.

<sup>2</sup> SSA administers the Old-Age, Survivors and Disability Insurance program under Title II of the *Social Security Act*, as amended. The Title II program provides monthly benefits to disabled individuals, qualified retirees, and survivors as well as their eligible dependents. *Social Security Act* §§ 202 and 223, 42 U.S.C. §§ 402 and 423.

- Reviewed previous Office of the Inspector General reports pertaining to claimant representative fees.

We determined the computer-processed data we used to select our population were sufficiently reliable for our intended use. We conducted tests to determine the completeness and accuracy of the data to achieve our audit objective.

We performed our audit work in Atlanta, Georgia, from January through December 2014. The entity reviewed was the Office of the Deputy Commissioner of Operations, Office of Public Service and Operations Support. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Appendix B – SAMPLE RESULTS AND PROJECTIONS

We sampled 250 of the 380,003 claimant representative fee payments identified in Calendar Years 2011 and 2012. Table B–1 details our population and sample.

**Table B–1: Claimant Representative Fee Population and Sample**

Population		Sample	
Size	Dollar	Size	Dollar
380,003	\$564,360,248	250	\$390,962

### Sampling and Test Results

We determined for the 250 sample claimant representative fees, 10 (4 percent) had payment errors totaling \$13,020. We deemed a claimant representative fee a reportable error when the fee error was equal to, or greater than, 1 percent of the claimant representative fee for underpayments and equal to, or greater than, 3 percent for overpayments. We projected our test results at the 90-percent confidence level, as shown in Table B–2.

**Table B–2: Test Results and Projections to the Population**

Projections of Attribute and Variable Appraisals	
<b>Population and Sample Data</b>	
Population: Number of Claimant Representative Fees	380,003
Sample Size: Number of Claimant Representative Fees	250
Number of Claimant Representative Fee Payment Errors in Sample	10
Dollar Value of Claimant Representative Fee Payment Errors in Sample	\$13,020
<b>Attribute Appraisal Projections</b>	
<b>Projection to Population</b>	<b>Projections</b>
Point Estimate	15,200
Lower Limit	8,309
Upper Limit	25,420
<b>Variable Appraisal Projections</b>	
<b>Projection to Population</b>	<b>Projections</b>
Point Estimate	\$19,791,255
Lower Limit	\$7,103,580
Upper Limit	\$32,478,931

**Note:** Projections made at the 90-percent confidence level.

## Appendix C – AGENCY COMMENTS

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### Social Security

#### MEMORANDUM

Date: May 18, 2015 Refer To: SIJ-3

To: Patrick P. O'Carroll, Jr.  
Inspector General

From: Frank Cristaudo /s/  
Counselor to the Commissioner

Subject: Office of the Inspector General Draft Report, "Accuracy of Claimant Representative Fees Paid on Title XVI Claims" (A-04-13-13030)--INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,  
“ACCURACY OF CLAIMANT REPRESENTATIVE FEES PAID ON TITLE XVI  
CLAIMS” (A-04-13-13030)**

Thank you providing us an opportunity to review your results. We are committed to ensuring that we calculate and pay benefits accurately. As noted below in our responses to the recommendations, we will continue our efforts and address any opportunities for enhancements.

**Recommendation 1**

Provide additional training to ensure employees correctly process the claimant representative fee.

**Response**

We agree. We will provide additional training by the end of calendar year 2015.

**Recommendation 2**

Work the 10 error cases we identified and make claimants and representatives whole, and once completed, determine whether it is cost-effective to review and work the remaining cases in our audit population.

**Response**

We agree. By the end of fiscal year 2015, we will take action on the error cases identified to make claimants and representatives whole. Upon completion of these cases, we will determine whether it is cost-effective to review and work the remaining cases from the audit population.

## Appendix D – MAJOR CONTRIBUTORS

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Theresa Roberts, Director, Atlanta Audit Division

Frank Nagy, Senior Auditor

Lisa Swanson, Senior Auditor

Shelley Guimond, Program Analyst

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