



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

Processing of Deferred Old-Age,
Survivors and Disability Insurance
Cases with a High Risk of Benefit
Payment Error

A-05-18-50620 / March 2019



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: March 15, 2019

Refer To:

To: The Commissioner

From: Inspector General

Subject: Processing of Deferred Old-Age, Survivors and Disability Insurance Cases with a High Risk of Benefit Payment Error (A-05-18-50620)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration correctly processed deferred Old-Age, Survivors and Disability Insurance cases it identified as having a high risk of benefit payment error.

If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, 410-965-9700.

A handwritten signature in black ink that reads 'Gail S. Ennis'.

Gail S. Ennis

Attachment

Processing of Deferred Old-Age, Survivors and Disability Insurance Cases with a High Risk of Benefit Payment Error

A-05-18-50620



March 2019

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) correctly processed deferred Old-Age, Survivors and Disability Insurance (OASDI) cases it identified as having a high risk of benefit payment error.

Background

In a deferred OASDI case, SSA withholds an individual's monthly benefit to collect prior incorrect payments or past-due Medicare premiums. An erroneous benefit deferral can occur if a technician incorrectly updates a beneficiary's record.

The Agency designed systems to alert staff of errors in updating individuals' records. However, staff could still make an error without causing a system alert. As a second line of review, in 2008, SSA deployed a program to identify cases with a high risk of error that leads to deferred benefits on individuals' records. Therefore, the technician must review and correct the record as quickly as possible because the beneficiary's payments have stopped.

We identified 19,661 cases that SSA's program classified as having a high risk of error in deferring payment of OASDI benefits based on the information gathered from program service centers (PSC) 2 through 6 for Fiscal Year 2017.

Findings

SSA did not always correctly process cases it identified as having a high risk of error in deferring payment of OASDI benefits. Of the 100 sampled beneficiary records we reviewed, SSA did not correctly process 66 it identified as having a high risk of error. Of the 66 errors, 54 resulted in improper payments. This included approximately \$115,000 in overpayments and \$87,000 in underpayments. We found four types of payment errors: (1) incorrect manual overpayment adjustments, (2) inaccurate manual adjustments to Medicare premiums owed, (3) failure to release underpayments, and (4) failure to take corrective action. We project SSA incorrectly processed the deferred cases for about 13,000 beneficiaries, which resulted in incorrect payments of approximately \$40 million to about 11,000 beneficiaries.

Additionally, we identified two beneficiaries who had incorrect overpayment amounts, totaling approximately \$6,000, posted to their records. Finally, SSA did not have consistent procedures among PSCs for identifying and correcting deferred benefit cases. Specifically, three of the eight PSCs did not use the program other PSCs used to identify deferred benefit cases.

Recommendations

We made four recommendations for SSA to address the payment and procedural errors that resulted from incorrectly processed deferral cases identified as high risk and improve consistency in the identification and correction of these cases across all PSCs.

SSA agreed with our recommendations.

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ABBREVIATIONS

C.F.R.	Code of Federal Regulations
FY	Fiscal Year
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
PSC	Program Service Center
SSA	Social Security Administration

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) correctly processed deferred Old-Age, Survivors and Disability Insurance (OASDI) cases it identified as having a high risk of benefit payment error.

BACKGROUND

According to SSA, in a deferred OASDI case, the Agency withholds an individual's monthly benefit to collect prior incorrect payments or past-due Medicare premiums. An erroneous benefit deferral can occur if a technician incorrectly updates a beneficiary's record.

The Agency designed systems to alert staff of errors in updating individuals' records.¹ However, staff could still make an error without causing a system alert. As a second line of review, in 2008, SSA deployed a program to assist program service centers (PSC)² in identifying deferred cases with a high risk of benefit payment error.³ Therefore, according to SSA, the technician must review and correct the record as quickly as possible because the beneficiary's payments have stopped.

We identified 19,661 cases that SSA's program classified as having a high risk of error in deferring payment of OASDI benefits based on the information gathered from PSCs 2 through 6 for Fiscal Year (FY) 2017.⁴ We reviewed a random sample of these cases to determine whether SSA correctly processed them. We used January 2018 as a cut-off for determining the error amounts for these sample cases. See Appendix A for our scope and methodology.

RESULTS OF REVIEW

SSA did not always correctly process cases it identified as having a high risk of error in deferring payment of OASDI benefits. Of the 100 sampled beneficiary records we reviewed, SSA did not correctly address 66 it identified as having a high risk of error. Of the 66 errors, 54 resulted in improper payments. This included approximately \$115,000 in overpayments and \$87,000 in underpayments. We found four types of payment errors: (1) incorrect manual overpayment adjustments, (2) inaccurate manual adjustments to Medicare premiums owed, (3) failure to release underpayments, and (4) failure to take corrective action. We project SSA incorrectly

¹ A record contains all payment and entitlement history for each person entitled on an account. For each case in our sample, we reviewed the beneficiary record associated with the alert. One sample case could contain an alert for multiple individuals on one record.

² PSCs are responsible for resolving complex OASDI issues that prevent field office employees from processing a claim or other various actions to update a beneficiary's record.

³ This program refers to these cases as "possible erroneous deferrals."

⁴ PSC use of the program to identify deferred cases is optional. See the *Inconsistent Procedures Among PSCs* section of this report for further discussion of the data available for our review.

processed the deferred cases for about 13,000 beneficiaries, which resulted in incorrect payments of approximately \$40 million to about 11,000 beneficiaries.

Additionally, we identified two beneficiaries who had incorrect overpayment amounts, totaling approximately \$6,000, posted to their records. Finally, SSA did not have consistent procedures among PSCs for the identification and correction of deferred benefit cases. Specifically, three of the eight PSCs did not use the program the other PSCs used to identify deferred benefit cases.

Incorrectly Processed Deferred Cases

SSA did not always correctly process cases it identified as having a high risk of error in deferring payment of OASDI benefits. Of the 100 sampled beneficiary records we reviewed, SSA did not correctly process 66 it identified as having a high risk of error.⁵ Of the 66 errors, 54 resulted in improper payments.⁶ Specifically, SSA overpaid 30 beneficiaries about \$115,000 and underpaid 24 beneficiaries approximately \$87,000 because staff incorrectly processed their cases. We project SSA incorrectly processed the deferred cases for about 13,000 beneficiaries, which resulted in incorrect payments of approximately \$40 million to about 11,000 beneficiaries. SSA should correct the 54 cases with improper payments⁷ and review the population of deferred OASDI cases we identified to determine whether additional cases need to be corrected.

Additionally, we identified two beneficiaries for whom SSA employees posted incorrect overpayment amounts, totaling approximately \$6,000, to their records.⁸ SSA should correct the two cases with incorrect overpayments we identified.

Types of OASDI Deferred Case Errors

While reviewing the 54 deferred cases that resulted in incorrect payments, we found four types of errors: (1) incorrect manual overpayment adjustments, (2) inaccurate manual adjustments to Medicare premiums owed, (3) failure to release underpayments, and (4) failure to take any corrective action. See Figure 1 for a breakdown of the types of errors in our sample.

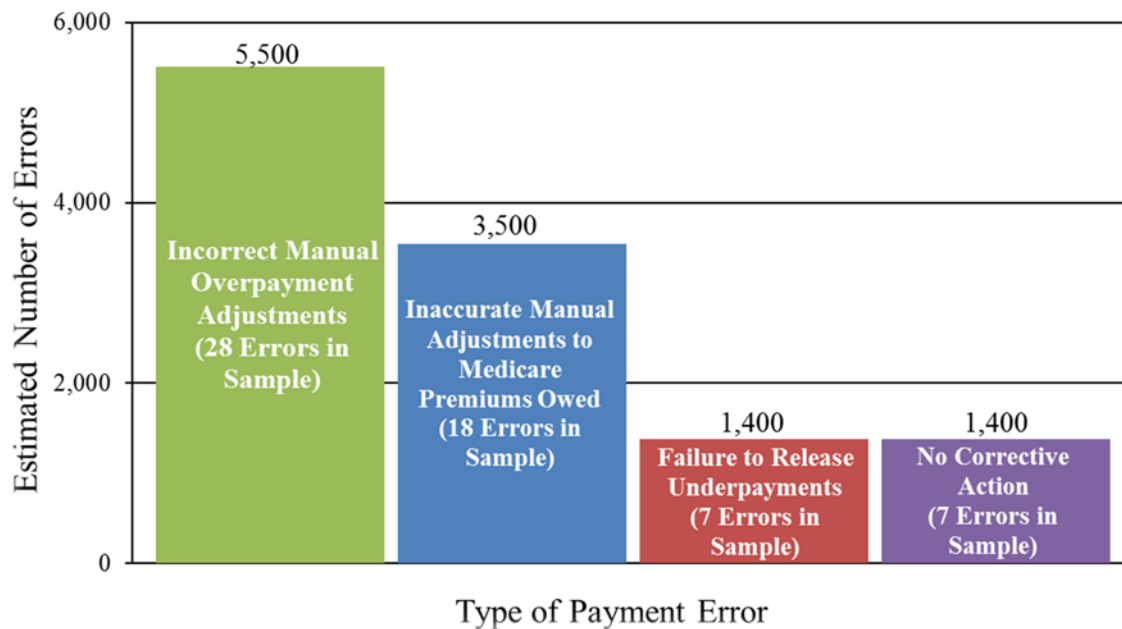
⁵ We did not review SSA's deferral program to determine whether the cases the program identified as deferred were correct or incorrect but rather to determine whether SSA properly processed the cases the program identified. We determined a case was an error if (1) SSA did not correct the deferral; (2) SSA incorrectly updated the record, either by removing a correct deferral or not fully addressing the case, resulting in an incorrect payment; or (3) correction did not comply with SSA policies and procedures.

⁶ SSA caused payment errors when staff failed to take corrective action or took incorrect action that caused additional payment errors.

⁷ See Appendix B for our sample methodology and results.

⁸ One of these beneficiary records had multiple errors. This occurred because the child on the record had an incorrect overpayment amount and the primary beneficiary was overpaid.

Figure 1: Estimated Number of Payment Errors in Deferred Benefit Cases—By Type of Error (Projected from our Sample of Beneficiary Records)



Note: We project on the total number of payment errors in our sample, and the projection figures are rounded. The errors do not total the 54 payment errors in our sample because some errors fell into more than 1 category. See Table B–4 for sample projection results.

Incorrect Manual Overpayment Adjustments

Of the 54 payment errors in our sample, 28 resulted from incorrect manual overpayment adjustments.⁹ SSA employees must consider all payments on a beneficiary’s record when they make corrections or updates, including payments made during previous benefit entitlement periods. For example, in April 2017, when processing a claim for Disability Insurance benefits, SSA withheld a fee¹⁰ payable to the beneficiary’s attorney but did not release retroactive benefits pending a Windfall Offset determination.¹¹ When SSA subtracted an amount for the attorney fee from the beneficiary’s monthly benefit before it paid the retroactive Disability Insurance

⁹ We discuss OASDI manual overpayment adjustments in a prior audit report, SSA, OIG, *Manual Adjustments to Old-Age, Survivors and Disability Insurance Overpayments*, A-07-18-50294 (April 2018).

¹⁰ If a claimant has attorney or non-attorney representation when filing for disability benefits, and the attorney is eligible for direct payment from SSA, the Agency withholds 25 percent (a maximum of \$6,000) from the claimant’s past-due benefits for the attorney’s fee for administrative or court proceedings. SSA *POMS*, GN 03920.035, A (June 22, 2009), GN 03940.003, B.3 (September 25, 2018).

¹¹ Windfall Offset is a reduction of OASDI or Supplemental Security Income retroactive benefits to prevent receipt of more than would have been received had the retroactive OASDI been paid when due. Retroactive OASDI benefits resulting from an initial award are reduced by the amount of Supplemental Security Income that would not have been paid if the OASDI benefit had been timely paid. SSA *POMS*, GN 02610.005, A.1 (April 25, 2012).

benefits, the beneficiary's monthly benefit was incorrectly put in deferred status. This caused all benefits to stop pending recovery of the incorrect overpayment for the prematurely withheld attorney fee. SSA took action to correct the erroneous deferral of benefits. However, when doing so, it did not identify an existing overpayment on the beneficiary's record from a previous period of disability entitlement. Accordingly, SSA's system incorrectly deleted the overpayment from the record, which resulted in an incorrect payment of about \$20,000 on the beneficiary's record.

Inaccurate Manual Adjustments of Medicare Premiums Owed

Of the 54 payment errors in our sample, 18 resulted from SSA's inaccurate manual correction of Medicare premiums the beneficiary owed. For example, SSA took action to update a beneficiary's Medicare entitlement in August 2017, which caused a deferred-case status and suspension of the beneficiary's monthly benefit payment. The benefit deferral was correct because the beneficiary owed past-due Medicare premiums. However, when SSA processed the deferred case, it incorrectly issued a refund of excess Medicare premiums, which resulted in an overpayment of about \$1,200 on the record.

Failure to Release Underpayments

Of the 54 payment errors in our sample, 7 resulted from SSA's failure to release additional benefits due. For example, in April 2017, SSA converted a beneficiary from reduced retirement benefits to disability benefits. The beneficiary was due additional benefits because of an earlier date of entitlement based on the disability benefit approval.¹² SSA caused the incorrect benefit deferral when it suspended an earlier period of entitlement causing the system to establish an incorrect overpayment. Although SSA took action to correct the benefit deferral, it failed to pay the additional benefits due, which caused a \$20,000 underpayment on the record.

Failure to Take Corrective Action

SSA did not take action on seven deferred cases it identified as having high risk of error. Failure to take corrective action on the deferred cases resulted in two overpayments, totaling about \$1,400, and four underpayments, totaling about \$22,000.¹³ At the time of our review, these beneficiaries remained under- or overpaid for an average of 17 months.

¹² SSA POMS, DI 10105.001, B (June 27, 2006).

¹³ The remaining case had an incorrect overpayment amount posted to the record. See the *Incorrectly Processed Deferred Cases* section of this report for further information about cases we identified with incorrect overpayment amounts.

Inconsistent Procedures Among PSCs

SSA did not have consistent procedures among PSCs for identifying and correcting cases it identified as having a high risk of error in deferring payment of OASDI benefits. Specifically, PSCs 1, 7, and 8 did not use the program other PSCs used to identify deferred benefit cases or have any process in place to identify deferred benefit cases.¹⁴ Additionally, for the five PSCs that used the local program to identify deferred cases, the procedures for correcting the deferred cases varied. Accordingly, SSA should develop and implement controls in all PSCs to identify and review deferred benefit cases with a high risk of benefit payment errors.

CONCLUSIONS

SSA did not always correctly process cases it identified as having a high risk of error in deferring payment of OASDI benefits. We project SSA incorrectly processed the deferred cases for about 13,000 beneficiaries, which resulted in incorrect payments of approximately \$40 million to about 11,000 beneficiaries. Additionally, we identified two beneficiaries who had incorrect overpayment amounts, totaling approximately \$6,000, posted to their records. Finally, SSA did not have consistent procedures among PSCs for identifying and correcting deferred benefit cases. Specifically, three of the eight PSCs did not use the program the other PSCs used to identify deferred benefit cases.

RECOMMENDATIONS

We recommend SSA:

1. Correct the 54 cases with improper payments we identified.
2. Correct the two cases with incorrect overpayments we identified.
3. Review the population of deferred OASDI cases we identified to assess whether additional cases need correction.
4. Develop and implement controls in all PSCs to identify and review deferred benefit cases with a high risk of benefit payment errors.

AGENCY COMMENTS

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

¹⁴ According to SSA, these PSCs can identify some deferral cases through alerts not related to benefit deferrals.

OTHER MATTERS

Of the 100 sample beneficiary records we reviewed, SSA processed 11 records incorrectly because they did not comply with Federal regulations or Agency policies. Of the 11 procedural errors, 9 occurred because SSA failed to send a notice informing the beneficiary of the overpayment before SSA began collection, as required.¹⁵ SSA's due-process policy requires that the beneficiary be given advance written notice before any action is taken when SSA finds an event will adversely affect a beneficiary.¹⁶ The notice must state the pending adverse action, reason for the action, evidence used to make the determination, effect on benefits, and number of days the beneficiary has to respond before SSA takes action.¹⁷ If the notification does not contain all required elements, SSA must send a new notice and repay any benefits prematurely withheld.¹⁸ Therefore, when SSA sends an insufficient notice, it can further delay collection of an overpayment on a record. We referred the 11 cases to SSA for appropriate action. However, we will provide formal recommendations related to due-process in our review of *The Social Security Administration's Application of Due-process Provisions for Old-Age, Survivors and Disability Insurance Overpayments* (A-07-18-50622).



Rona Lawson
Assistant Inspector General for Audit

¹⁵ 20 C.F.R. § 404.502(a) (govinfo.gov 2018). The remaining two procedural errors resulted from incorrect annotations on the beneficiaries' records.

¹⁶ An adverse action is a determination resulting in non-entitlement to benefits, termination of entitlement, a benefit reduction, a suspension, or an earnings record change. SSA, *POMS*, GN 03001.005, B.1 (May 12, 2003).

¹⁷ SSA, *POMS*, GN 03001.015, A.1 (July 16, 2004).

¹⁸ SSA, *POMS*, GN 02201.009, I (July 25, 2018).

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objectives, we performed the following steps.

- We reviewed relevant sections of the *Code of Federal Regulations*, *Social Security Act*, and Social Security Administration's (SSA) policies and procedures.
- Obtained a list of 19,661 cases that SSA's program identified as possibly erroneously deferred in Fiscal Year 2017 from all program service centers (PSC) that used the program.¹
- Selected a random sample of 100 beneficiary records for review.
- Determined whether SSA staff corrected and processed the beneficiary deferral according to policy by reviewing evidence from various SSA queries and other relevant sources in SSA systems. Specifically, we reviewed information from
 - Paperless Read Only Query System;
 - Recovery of Overpayment, Accounting, and Reporting system;
 - Master Beneficiary Record;
 - Payment History Update System;
 - Medicare Premium Payment Query;
 - Medicare Income Related Monthly Adjustment Amount D Direct Billing Query;
 - Online Retrieval System; and
 - Electronic 4345 application.
- Identified the technician action that created the possible erroneous deferral alert.
- Reviewed what was paid versus payable to determine any associated overpayment or underpayment on the record.

¹ Deferred benefit cases in one PSC were unavailable for two months during FY 2017. According to SSA, the data was unavailable for October and November 2016 because of staffing issues.

Our review of internal controls was limited to gaining an understanding of the nature of the program SSA used to identify possible erroneous deferral cases. We did not verify the completeness of the data SSA provided for our review since we did not have the capability to obtain a complete list of cases SSA's program identified as possibly erroneously deferred. To obtain these data, SSA requested a list of cases from each of the PSCs because SSA did not maintain a database of all erroneous deferral cases at the time of our audit. As not all PSCs used the program, we limited our analysis to the list of cases provided by SSA.

We conducted our audit from July through October 2018 in Chicago, Illinois. The principal entity audited was the Office of Operations. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B – SAMPLING METHODOLOGY AND RESULTS

Sampling

We reviewed a sample of 100 records to determine whether the Social Security Administration (SSA) corrected and processed the beneficiary deferral according to policy (see Table B-1). We made statistical projections for the entire population based on the results of our sample analysis.¹

Table B-1: Population and Sample Size

Sample Size	100
Total Population	19,661

Sample Errors and Projections

For the sample of 100 beneficiary records SSA identified as having a high risk of error in deferring payment of Old-Age, Survivors and Disability Insurance benefits in Fiscal Year 2017, we determined the Agency erroneously processed 66 cases. Of the 66 erroneously processed cases, 54 resulted in incorrect payments. The incorrect payments on these records totaled approximately \$200,000. The payment errors occurred for the following reasons: (1) incorrect manual overpayment adjustments, (2) inaccurate manual adjustments of Medicare premiums owed, (3) failure to release underpayments, and (4) failure to take corrective action.

Table B-2: Errors Identified for Deferred Benefits Reviewed

Description	Total Errors	Payment Errors
Sample Results	66	54
Population Projection	12,976	10,617
Projection – Lower Limit	11,294	8,910
Projection – Upper Limit	14,515	12,288

Note: All projections are at the 90-percent confidence level.

Table B-3: Improper Payments Identified for Deferred Benefits Reviewed

Description	Improper Payment Amount
Sample Results	\$202,004
Population Projection	\$39,716,054
Projection – Lower Limit	\$20,708,517
Projection – Upper Limit	\$58,723,590

Note: All projections are at the 90-percent confidence level.

¹ We limited analysis to the 19,661 cases provided by SSA because three program service centers (PSC) did not utilize the program necessary to identify these cases. Our projections are limited to the cases provided from the remaining five PSCs.

Table B–4: Error Types Identified for Deferred Benefits Reviewed

Description	Type of Error			
	Incorrect Manual Overpayment Adjustment	Inaccurate Manual Adjustment to Medicare Premiums Owed	Failure to Release Underpayments	No Corrective Action
Sample Results	28	18	7	7
Population Projection	5,505	3,539	1,376	1,376
Projection – Lower Limit	4,071	2,356	657	657
Projection – Upper Limit	7,136	5,012	2,503	2,503

Note: Some cases had more than one type of error. All projections are at the 90-percent confidence level.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: March 11, 2019

Refer To: SIJ-3

To: Gale S. Ennis
Inspector General

Stephanie Hall

From: Stephanie Hall
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Processing of Deferred Old-Age, Survivors and Disability Insurance Cases with a High Risk of Benefit Payment Error" (A-05-18-50620) -- 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 Trae Sommer at (410) 965-9102.

SSA COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT, “PROCESSING OF DEFERRED OLD-AGE, SURVIVORS AND DISABILITY INSURANCE CASES WITH A HIGH RISK OF BENEFIT PAYMENT ERROR” (A-05-18-50620)

GENERAL COMMENTS

As OIG mentions in the audit, we deployed a program to identify deferred cases that are at high risk for potential benefit payment error. Currently, five of the eight processing centers (PC) use this program to identify the high risk cases and conduct a quality review. While this program allows for a second line review of the cases, technicians at both the initial and secondary level are still required to manually perform complex calculations and code our system with benefit information. With future IT Modernization developments underway, our objective is to create a user-friendly post-entitlement process that produces timely and accurate payments and reduces current processing limitations and the need for manual case processing. In the interim, we will continue to explore options for the proper identification and review of these high risk cases in all PCs.

Recommendation 1

Correct the 54 cases with improper payments we identified.

Response

We agree.

Recommendation 2

Correct the two cases with incorrect overpayments we identified.

Response

We agree.

Recommendation 3

Review the population of deferred OASDI cases we identified to assess whether additional cases need correction.

Response

We agree.

Recommendation 4

Develop and implement controls in all PSCs to identify and review deferred benefit cases with a high risk of benefit payment errors.

Response

We agree.

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