



SOCIAL SECURITY

MEMORANDUM

Date: June 10, 2002

Refer To:

To: Michael W. Grochowski
Regional Commissioner

From: Inspector General

Subject: Financial-Related Audit of Jackson County Public Administrator - An Organizational Representative Payee for the Social Security Administration (A-07-02-22002)

Attached is a copy of our final report. Our objectives were to determine whether the Jackson County Public Administrator (1) had effective safeguards over the receipt and disbursement of Social Security benefits and (2) ensured Social Security benefits were used and accounted for in accordance with the Social Security Administration's policies and procedures.

Please comment within 60 days from the date of this memorandum on corrective action taken or planned on each recommendation. 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.

A handwritten signature in blue ink, appearing to read "James G. Huse, Jr.".

James G. Huse, Jr.

Attachment

**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**FINANCIAL-RELATED AUDIT OF
THE JACKSON COUNTY PUBLIC
ADMINISTRATOR – AN ORGANIZATIONAL
REPRESENTATIVE PAYEE FOR THE
SOCIAL SECURITY ADMINISTRATION**

JUNE 2002

A-07-02-22002

AUDIT REPORT



Mission

We improve SSA programs and operations and protect them against fraud, waste, and abuse by conducting independent and objective audits, evaluations, and investigations. We provide timely, useful, and reliable information and advice to Administration officials, the Congress, and the public.

Authority

The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:

- Conduct and supervise independent and objective audits and investigations relating to agency programs and operations.**
- Promote economy, effectiveness, and efficiency within the agency.**
- Prevent and detect fraud, waste, and abuse in agency programs and operations.**
- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.**
- Keep the agency head and the Congress fully and currently informed of problems in agency programs and operations.**

To ensure objectivity, the IG Act empowers the IG with:

- Independence to determine what reviews to perform.**
- Access to all information necessary for the reviews.**
- Authority to publish findings and recommendations based on the reviews.**

Vision

By conducting independent and objective audits, investigations, and evaluations, we are agents of positive change striving for continuous improvement in the Social Security Administration's programs, operations, and management and in our own office.

Executive Summary

OBJECTIVE

Our objectives were to determine whether the Jackson County Public Administrator (JCPA) (1) had effective safeguards over the receipt and disbursement of Social Security benefits and (2) ensured Social Security benefits were used and accounted for in accordance with the Social Security Administration's (SSA) policies and procedures.

BACKGROUND

Some beneficiaries cannot manage or direct the management of their finances because of their age or mental and/or physical impairments. Congress granted SSA the authority to appoint representative payees (Rep Payee) to receive and manage these beneficiaries'¹ payments. A Rep Payee may be an individual or an organization. SSA selects Rep Payees for Old-Age, Survivors and Disability Insurance beneficiaries or Supplemental Security Income recipients when representative payments would serve the individuals' interests.

Rep Payees are responsible for using benefits to serve the best interests of the beneficiary or recipient. Their duties include:

- using benefits to meet the beneficiary's current and foreseeable needs;
- conserving and investing benefits not needed to meet the individual's current needs;
- maintaining accounting records of how the benefits are received and used;
- reporting events to SSA that may affect the individual's entitlement or benefit payment amount;
- reporting any changes in circumstances that would affect their performance as Rep Payees; and
- providing SSA an annual Representative Payee Report (RPR) accounting for how benefits were spent and invested.

¹ We use the term "beneficiary" generically in this report to refer to both Old-Age, Survivors and Disability Insurance beneficiaries and Supplemental Security Income recipients.

JCPA is a county agency that reports to the Probate Division of the Circuit Court of Jackson County in Kansas City, Missouri. JCPA has 31 employees and serves as an Organizational Rep Payee² for SSA. During our audit period, JCPA served as Rep Payee for 704 SSA beneficiaries. In addition, JCPA serves as the court-appointed guardian/conservator for individuals who have no one else to care for them.

RESULTS OF REVIEW

Except for the lack of adequate documentation supporting the personal needs allowance of institutionalized beneficiaries, JCPA had effective safeguards over the receipt and disbursement of Social Security benefits and ensured Social Security benefits were used and accounted for in accordance with SSA's policies and procedures. JCPA did not have adequate documentation to support the personal needs allowance of institutionalized beneficiaries. This lack of documentation was mitigated by the fact that most of the benefit payments JCPA received were for the cost of beneficiaries' care.

Of the 50 beneficiaries included in our sample, 44 lived in institutions (for example, nursing homes), and 6 lived in private residences. For the 44 institutionalized beneficiaries, JCPA provided the institutions a \$30 monthly personal needs allowance. The institutions were allowed to determine how the monthly personal needs allowance was spent and were required to provide JCPA quarterly reports detailing the expenditures. However, JCPA did not require the institutions to retain and/or submit documentation supporting the expenditures (that is, receipts, cash disbursement ledgers, etc). The absence of supporting documentation prevented us from independently verifying that the beneficiaries for which the monthly personal needs allowance was intended actually received and/or benefited from the funds.

Based on the results of our statistical sample, we estimate that JCPA provided at least \$170,070 to institutions for monthly personal needs allowances from May 1, 2000 through April 30, 2001. The \$170,070 represents 5.4 percent of at least \$3,147,515 in SSA benefits JCPA received for the 704 beneficiaries.

We could not determine whether JCPA properly reported to SSA how benefits were used in all cases because SSA did not provide 11 of the 41 RPRs we requested. Also, discrepancies regarding the numbers of beneficiaries for which JCPA served as Rep Payee were identified within various Representative Payee System queries. These two issues are discussed in the Other Matters section of this report.

² An Organizational Rep Payee can be a social service agency, a Government agency official, or a financial institution.

RECOMMENDATION

We recommend that SSA ensure JCPA maintains the proper level of documentation to account for and safeguard the monthly personal spending allowances of SSA beneficiaries living in institutions.

AGENCY COMMENTS

In response to our draft report, SSA agreed with our recommendation. See Appendix B for the full text of SSA's comments to our draft report.

REP PAYEE COMMENTS

JCPA did not provide comments to our draft report.

Table of Contents

	Page
INTRODUCTION	1
RESULTS OF REVIEW	5
Monthly Personal Needs Allowance	5
RECOMMENDATION	7
OTHER MATTERS	8
Rep Payee Reports	8
Rep Payee System	8
APPENDICES	
APPENDIX A – Sampling Methodology and Results	
APPENDIX B – Agency Comments	
APPENDIX C – OIG Contact and Staff Acknowledgments	

Acronyms

JCPA	Jackson County Public Administrator
OASDI	Old-Age, Survivors and Disability Insurance
Rep Payee	Representative Payee
RPS	Representative Payee System
RPR	Representative Payee Report
SSA	Social Security Administration
SSI	Supplemental Security Income

OBJECTIVE

Our objectives were to determine whether the Jackson County Public Administrator (JCPA) (1) had effective safeguards over the receipt and disbursement of Social Security benefits and (2) ensured Social Security benefits were used and accounted for in accordance with the Social Security Administration's (SSA) policies and procedures.

BACKGROUND

Some beneficiaries cannot manage or direct the management of their finances because of their age or mental and/or physical impairments. Congress granted SSA the authority to appoint representative payees (Rep Payee) to receive and manage these beneficiaries and recipients' benefit payments.¹ A Rep Payee may be an individual or an organization. SSA selects Rep Payees for Old-Age, Survivors and Disability Insurance (OASDI) beneficiaries or Supplemental Security Income (SSI) recipients when representative payments would serve the individuals' interests.

REPRESENTATIVE PAYEE RESPONSIBILITIES

Rep Payees are responsible for using benefits to serve the best interests of the beneficiary or recipient. Their duties include:

- using benefits to meet the beneficiary's current and foreseeable needs;
- conserving and investing benefits not needed to meet the individual's current needs;
- maintaining accounting records of how the benefits are received and used;
- reporting events to SSA that may affect the individual's entitlement or benefit payment amount;
- reporting any changes in circumstances that would affect their performance as Rep Payees; and
- providing SSA an annual Representative Payee Report (RPR) accounting for how benefits were spent and invested.²

¹ 42 U.S.C. §§ 405(j) and 1383(a)(2).

² Id.; 20 C.F.R., part 404, subpart U and part 416, subpart F.

About 7 million individuals have Rep Payees—approximately 4.4 million are OASDI beneficiaries, 2 million are SSI recipients, and 600,000 are entitled to both OASDI and SSI. The following chart reflects the types of Rep Payees and the number of individuals they serve.

Type of Rep Payee	Number of Rep Payees	Number of Individuals Served
Individual Payees: Parents, Spouses, Adult Children, Relatives, and Others	4,949,000	6,160,000
Organizational Payees: State Institutions, Local Governments and Others	44,150	759,000
Organizational Payees: Fee-for-Service	850	81,000
TOTAL	4,994,000	7,000,000

JCPA

JCPA is a county agency that reports to the Probate Division of the Circuit Court of Jackson County in Kansas City, Missouri. JCPA has 31 employees and serves as an Organizational Rep Payee³ for SSA. During our audit period, JCPA served as Rep Payee for 704 SSA beneficiaries. JCPA also serves as the court-appointed guardian/conservator for individuals who have no one else to care for them. As guardian, JCPA is responsible for the individuals' living conditions and medical treatment. As conservator, JCPA is responsible for their financial matters. JCPA receives a fee from the State of Missouri for the services it provides as guardian/conservator. JCPA conducts periodic site visits to the institutions and private residences that house the individuals in its care including SSA beneficiaries. During the site visits, JCPA ensures that beneficiaries are residing in acceptable living conditions and that their needs are being met.

As shown in the table below, SSA paid \$255,437 to JCPA for the sample of 50 beneficiaries from May 1, 2000 through April 30, 2001.

	Number of Cases	Benefits Received		Total SSA Funds
		SSI	OASDI	
SSI Only	14	\$54,742	\$0	\$54,742
OASDI Only	26	0	150,482	150,482
Concurrent	10	12,932	37,281	50,213
Total	50	\$67,674	\$187,763	\$255,437

³ An Organizational Rep Payee can be a social service agency, a Government agency official, or a financial institution.

SCOPE AND METHODOLOGY

Our audit covered the period May 1, 2000 through April 30, 2001. To accomplish our objectives, we:

- Reviewed the Social Security Act, SSA regulations, rules, policies and procedures pertaining to Rep Payees.
- Contacted the Kansas City, Missouri, SSA Regional Office and the Kansas City, Missouri, (South) field office staff to obtain background information about the Rep Payee's performance.
- Obtained from SSA's Representative Payee System (RPS) a list of beneficiaries who were in the Rep Payee's care during our audit period (May 1, 2000 through April 30, 2001).
- Obtained from the Rep Payee a list of beneficiaries⁴ who were in its care as of July 6, 2001.
- Compared and reconciled the RPS and the Rep Payee's listings to identify a population of 704 SSA beneficiaries who were in the Rep Payee's care during our audit period.
- Reviewed and tested the Rep Payee's internal controls over the receipt and disbursement of OASDI benefits and SSI payments.
- Performed the following tests for the 50 beneficiaries included in our sample.
 - Compared and reconciled benefit amounts paid according to the Rep Payee's records to benefit amounts paid according to SSA's records.
 - Reviewed the Rep Payee's accounting records to determine whether benefits were properly spent or conserved on the individual's behalf. We also determined whether SSA was due a refund for any overpaid benefits.
 - Traced a sample of recorded expenses to source documents and examined the underlying documentation for reasonableness and authenticity.
- Used statistical sampling to estimate (1) the amount JCPA provided to institutions for monthly personal needs allowances during our audit period and (2) the total SSA benefits received by JCPA for the 704 beneficiaries during our audit period (see Appendix A).

⁴ The Rep Payee could not provide a list of beneficiaries in its care during our audit period because it maintained manual accounting records based on guardianship/conservator responsibilities, not by Rep Payee responsibilities.

- Interviewed a sample of the Rep Payee's beneficiaries, personal guardians, or caregivers to determine whether their basic needs were being met.
- Reviewed a sample of RPRs to determine whether the Rep Payee properly reported to SSA how benefits were used.
- Reviewed six Forms SSA-11 (*Request to Be Selected As Payee*) submitted to SSA by JCPA to ensure proper signature by the Rep Payee.

We performed our audit at JCPA in Kansas City, Missouri, and SSA's Kansas City, Missouri, (South) field office between July and November 2001. We conducted our audit in accordance with generally accepted government auditing standards.

Results of Review

Except for the lack of adequate documentation supporting the personal needs allowance of institutionalized beneficiaries, JCPA had effective safeguards over the receipt and disbursement of Social Security benefits and ensured Social Security benefits were used and accounted for in accordance with SSA's policies and procedures. JCPA did not have adequate documentation supporting the monthly personal needs allowance of institutionalized beneficiaries. This lack of documentation was mitigated by the fact that most of the benefit payments JCPA received were for the cost of beneficiaries' care.

We could not determine whether JCPA properly reported to SSA how benefits were used in all cases because SSA did not provide 11 of the 41 RPRs we requested. Also, discrepancies regarding the numbers of beneficiaries for which JCPA served as Rep Payee were identified within various RPS queries. These two issues are discussed in the Other Matters section of this report.

MONTHLY PERSONAL NEEDS ALLOWANCE

A Rep Payee's duties include ensuring that SSA beneficiary's needs are met. SSA's policy states that the Rep Payee of all institutionalized beneficiaries should provide at least \$30 each month for the beneficiaries' personal needs.⁵ Furthermore, the Rep Payee should keep written records of all payments received from SSA and how they are spent and/or saved.⁶

Of the 50 beneficiaries included in our sample, 44 lived in institutions (for example, nursing homes), and 6 lived in private residences. For the 44 institutionalized beneficiaries, JCPA provided the institutions with a \$30 monthly personal needs allowance. The institutions were allowed to determine how the monthly personal needs allowance was spent and were required to provide JCPA quarterly reports detailing the expenditures. However, JCPA did not require the institutions to retain and/or submit documentation supporting the expenditures (that is, receipts, cash disbursement ledgers, etc).

We reviewed 20 beneficiaries' quarterly reports provided by institutions to JCPA in support of the monthly personal needs allowance expenditures. The expenditures on these quarterly reports appeared reasonable. However, the absence of supporting documentation prevented us from independently verifying that the beneficiaries for which the monthly personal needs allowance was intended actually received and/or

⁵ *Representative Payment Program, Guide for Organizational Representative Payees, What is Proper Use of Benefits, Institutionalized Beneficiaries*, page 1 of 3.

⁶ *Representative Payment Program, Guide for Organizational Representative Payees, What Are Your Duties As a Representative Payee*, page 1 of 1.

benefited from the allowance. The lack of documentation was mitigated by the fact that most of the benefit payments JCPA received were for the cost of beneficiaries' care.

Based on the results of our statistical sample, we estimate that JCPA provided at least \$170,070 to institutions for monthly personal needs allowances from May 1, 2000 through April 30, 2001. The \$170,070 represents 5.4 percent of at least \$3,147,515 in SSA benefits received by JCPA for the 704 beneficiaries.

JCPA should have a system in place to account for beneficiaries' \$30 personal needs allowance. At a minimum, JCPA should require the institutions to maintain a ledger with the beneficiary's signature for cash disbursements and receipts for all noncash distributions.

Recommendation

We recommend that SSA ensure JCPA maintains the proper level of documentation to account for and safeguard the monthly personal spending allowances of SSA beneficiaries living in institutions.

AGENCY COMMENTS

In response to our draft report, SSA agreed with our recommendation. See Appendix B for the full text of SSA's comments to our draft report.

REP PAYEE COMMENTS

JCPA did not provide comments to our draft report.

REP PAYEE REPORTS

To determine whether JCPA properly reported to SSA how benefits were used, we requested from SSA the most recently completed RPRs for 41 of our sample of 50 beneficiaries. While JCPA staff stated they submitted RPRs to SSA for all of JCPA's beneficiaries, SSA was unable to provide 11 of the 41 RPRs we requested. Because SSA did not provide all the RPRs requested, we could not independently confirm that JCPA met its reporting responsibilities. For the 11 RPRs SSA could not provide, we do not know whether the RPRs were actually submitted to SSA by JCPA or whether JCPA provided them to SSA and SSA could not locate them.

REP PAYEE SYSTEM

To determine the number of beneficiaries for which JCPA served as Rep Payee, we accessed the "RP screening query response" within RPS. The query identified JCPA as the Rep Payee for 697 beneficiaries. However, the "organization/institution query response" within RPS identified JCPA as the Rep Payee for 899 beneficiaries. Both queries should have reported the same number of beneficiaries. We discussed this discrepancy with SSA field office staff who indicated that it was a systems-related problem beyond their control. We also contacted SSA's Office of Systems in Baltimore, Maryland, but staff was unable to explain why discrepancies existed in the two queries.

Appendices

SAMPLING METHODOLOGY AND RESULTS

We obtained from the Representative Payee System (RPS) and the representative payee (Rep Payee) separate listings of beneficiaries who were in the Rep Payee’s care and had received Social Security Administration (SSA) funds or had left the Rep Payee’s care during our audit period. We compared and reconciled the Rep Payee’s list with the RPS list and identified a population of 704 SSA beneficiaries under the Rep Payee’s care during our audit period. From this population, we obtained a random sample of 50 cases.

The Rep Payee received \$255,437 in SSA funds for the 50 sampled individuals from May 1, 2000 through April 30, 2001 of which \$13,740 was for the monthly personal needs allowance. Based on the results of our statistical sample, we estimate that the Rep Payee provided at least \$170,070 to institutions for monthly personal needs allowances during the time period of May 1, 2000 through April 30, 2001. The \$170,070 represents 5.4 percent of at least \$3,147,515 in SSA benefits received by the Rep Payee for the 704 beneficiaries.

Sample Results and Projections	
Population Size	704
Sample Size	50
Sample Results – SSA Benefits	\$255,437
Sample Results – Monthly Allowance	\$13,740
Dollar Projections	
Projection – SSA Benefits	\$3,596,555
Projection Lower Limit	\$3,147,515
Projection Upper Limit	\$4,045,594
Projection – Monthly Allowance	\$193,459
Projection Lower Limit	\$170,070
Projection Upper Limit	\$216,848

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

AGENCY COMMENTS

From: ||KC ARC MOS
Sent: Thursday, May 16, 2002 4:10 PM
To: Schaeffer, Steve
Cc: Bailey, Mark; Combs, Roietta; O'Neil, Shawn; Kelley, Carolyn; Staples, Rick; Woods, Fran; ||KC ORC; Dorothy Mask (E-mail); Ken Powell (E-mail)
Subject: COMMENTS FOR THE OIG REPORT ON JACKSON COUNTY - Response From Kansas City Regional Office

Importance: High

Thank you for the opportunity to comment on the Draft Report of the Financial-Related Audit of Jackson County Public Administrator. Based on our involvement in the representative payee process, we believe the findings are valid and the one recommendation made is reasonable.

The recommendation (that SSA ensure JCPA maintains the proper level of documentation to account for and safeguard the monthly personal spending allowances of SSA beneficiaries living in institutions) will be addressed by the local field office with assistance from the Regional office, working with JCPA.

If there are any questions, please contact Fran Woods, Director, Center for Systems and Programs, 816-936-5621.

/s/

Dorothy E. Mask for
Michael W. Grochowski

OIG CONTACTS AND STAFF ACKNOWLEDGMENTS

OIG CONTACTS

Bill Fernandez, Director, Western Audit Division (510) 970-1739

Mark Bailey, Deputy Director, (816) 936-5591

ACKNOWLEDGMENTS

In addition to the persons named above:

Ronald Bussell, Lead Auditor

Kenneth Bennett, Lead Auditor

Richard Reed, Auditor

Kimberly Beauchamp, Writer-Editor

For additional copies of this report, please visit our web site at www.ssa.gov/oig or contact the Office of the Inspector General's Public Affairs Specialist at (410) 966-1375. Refer to Common Identification Number A-07-02-22002.

DISTRIBUTION SCHEDULE

	<u>No. of Copies</u>
Commissioner of Social Security	1
Management Analysis and Audit Program Support Staff, OFAM	10
Inspector General	1
Assistant Inspector General for Investigations	1
Assistant Inspector General for Executive Operations	3
Assistant Inspector General for Audit	1
Deputy Assistant Inspector General for Audit	1
Director, Data Analysis and Technology Audit Division	1
Director, Financial Audit Division	1
Director, Western Audit Division	1
Director, Southern Audit Division	1
Director, Northern Audit Division	1
Director, General Management Audit Division	1
Issue Area Team Leaders	25
Income Maintenance Branch, Office of Management and Budget	1
Chairman, Committee on Ways and Means	1
Ranking Minority Member, Committee on Ways and Means	1
Chief of Staff, Committee on Ways and Means	1
Chairman, Subcommittee on Social Security	2
Ranking Minority Member, Subcommittee on Social Security	1
Majority Staff Director, Subcommittee on Social Security	2
Minority Staff Director, Subcommittee on Social Security	2
Chairman, Subcommittee on Human Resources	1
Ranking Minority Member, Subcommittee on Human Resources	1
Chairman, Committee on Budget, House of Representatives	1
Ranking Minority Member, Committee on Budget, House of Representatives	1
Chairman, Committee on Government Reform and Oversight	1
Ranking Minority Member, Committee on Government Reform and Oversight	1
Chairman, Committee on Governmental Affairs	1
Ranking Minority Member, Committee on Governmental Affairs	1

Chairman, Committee on Appropriations, House of Representatives	1
Ranking Minority Member, Committee on Appropriations, House of Representatives	1
Chairman, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, House of Representatives	1
Ranking Minority Member, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, House of Representatives	1
Chairman, Committee on Appropriations, U.S. Senate	1
Ranking Minority Member, Committee on Appropriations, U.S. Senate	1
Chairman, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, U.S. Senate	1
Ranking Minority Member, Subcommittee on Labor, Health and Human Services, Education and Related Agencies, Committee on Appropriations, U.S. Senate	1
Chairman, Committee on Finance	1
Ranking Minority Member, Committee on Finance	1
Chairman, Subcommittee on Social Security and Family Policy	1
Ranking Minority Member, Subcommittee on Social Security and Family Policy	1
Chairman, Senate Special Committee on Aging	1
Ranking Minority Member, Senate Special Committee on Aging	1
Vice Chairman, Subcommittee on Government Management Information and Technology	1
President, National Council of Social Security Management Associations, Incorporated	1
Treasurer, National Council of Social Security Management Associations, Incorporated	1
Social Security Advisory Board	1
AFGE General Committee	9
President, Federal Managers Association	1
Regional Public Affairs Officer	1
Total	97

Overview of the Office of the Inspector General

Office of Audit

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

Office of Executive Operations

The Office of Executive Operations (OEO) provides four functions for the Office of the Inspector General (OIG) – administrative support, strategic planning, quality assurance, and public affairs. OEO supports the OIG components by providing information resources management; systems security; and the coordination of budget, procurement, telecommunications, facilities and equipment, and human resources. In addition, this Office coordinates and is responsible for the OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act. The quality assurance division performs internal reviews to ensure that OIG offices nationwide hold themselves to the same rigorous standards that we expect from the Agency. This division also conducts employee investigations within OIG. The public affairs team communicates OIG's planned and current activities and the results to the Commissioner and Congress, as well as other entities.

Office of Investigations

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

Counsel to the Inspector General

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