OFFICE OF
THE INSPECTOR GENERAL

SOCIAL SECURITY ADMINISTRATION

**THE SOCIAL SECURITY
ADMINISTRATION'S
INDEPENDENCE DAY
ASSESSMENT**

March 2006   A-07-06-26009

EVALUATION
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.

SOCIAL SECURITY

OBJECTIVE

Our objective was to determine whether the Social Security Administration's (SSA) Independence Day Assessment (IDA) procedures are effective for deciding when Disability Determination Services (DDS) are ready to implement the electronic folder system of record under SSA's electronic disability (eDib) initiative.

BACKGROUND

SSA's initiative to implement an efficient paperless disability claims processing system, in which the large volume of documents traditionally stored in paper folders can be stored, viewed and processed electronically, is known as eDib. In September 2003, eDib became a high priority initiative for SSA when the Commissioner announced her long-term strategy to improve the disability claims process. The Commissioner envisioned eDib as a prerequisite to an improved disability claims process.[1] The main goal of eDib is to reduce the delays produced by organizing, mailing, locating, and reconstructing paper folders among all the disability claims processing components. All components involved in adjudicating disability claims will be affected by eDib—field offices, processing centers, DDSs, disability quality branches, and Office of Hearings and Appeals. Each component will work claims electronically by accessing and retrieving data and images collected, produced, and stored in an electronic folder (EF).

To determine when a DDS is ready to implement the EF, SSA developed the following four-step IDA process.

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[1] Statement of the Honorable Jo Anne B. Barnhart, Commissioner of Social Security, Testimony Before the House Committee on Ways and Means, Social Security Subcommittee, September 25, 2003.

1. The Assessment Visit is designed to identify issues that could prevent the DDS from processing claims in a fully electronic environment. The Assessment Visit tests the DDS' new business process for processing claims electronically through a comprehensive comparison of the paper disability claims folder under the old business process with the new business processes for the EF.

2. Training verification to ensure that adequate training is completed by all EF users.

3. Record-keeping requirements certification for National Archives and Records Administration compliance.

4. A Validation Visit to ensure all critical discrepancies[2] between the paper claims folder and the EF were resolved. The validation visit results are used by SSA to decide whether the DDS can rely solely on the EF and begin to eliminate the old business process, including the paper claims folder.

Our review focused on the IDA certifications of the Mississippi and Illinois DDSs—the first two DDSs certified by SSA to operate in a fully electronic environment. See Appendix B for detailed information on the IDA process and Appendix C for information on the scope and methodology of our review.

RESULTS OF REVIEW

We found that SSA's IDA procedures were generally effective for deciding when DDSs are ready to implement the EF. Specifically, SSA generally followed the IDA policies and procedures to certify the Mississippi and Illinois DDSs as ready to process claims electronically. Furthermore, issues that could potentially affect the outcome of the disability decision and the completeness of the EF, referred to as critical discrepancies by SSA, were resolved or alternate processes were implemented by SSA prior to the certification of the Mississippi and Illinois DDSs.

However, we found that the IDA certification process could be strengthened. Specifically, SSA needs to:

- Maintain all documentation required by IDA policies and procedures to support the results of the IDA certification process; and

- Resolve or schedule for resolution all computer system problems reported in the Change, Asset and Problem Reporting System at the time of the validation visit.

In addition, SSA should establish a schedule to permanently resolve temporary workaround issues that existed after DDS certification. The permanent resolution of the workaround issues will improve the efficiency of the EF.

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[2] SSA defines a critical discrepancy as one that could affect the disability decision by producing an incomplete EF.

SSA's IDA PROCESS

SSA has written policies and procedures for the IDA certification process, including the:

- *IDA Protocol*, which is SSA's detailed plan to ensure that the Agency documents its methodology and review results for determining a DDS' readiness to operate in a fully electronic environment. The IDA process also supports the decision-making process for determining when the Agency can rely on the EF as the Agency's official record. SSA considers the IDA Protocol a work-in-progress, and modifies and improves the policies and procedures as it gains experience from completed DDS certifications.

- *Independence Day Assessment Guide to Conducting the DMA (Document Management Architecture) Review Portion of IDA Assessment Visit and IDA Validation (IDA Guide)*, which provides the IDA Team with detailed, written guidance for conducting the Assessment and Validation Visits.

- *Guide to Preparing for an IDA Assessment Visit*, which provides valuable information to assist DDSs in preparing for IDA certification.

Did SSA follow IDA policies and procedures?
SSA generally followed its established IDA policies and procedures during the IDA certification processes at the Mississippi and Illinois DDSs. However, complete documentation was not always maintained to support the results of the IDA process. Specifically:

- Documentation did not exist to support the final resolution of five critical discrepancies identified during the Mississippi DDS' Assessment Visit. We concluded that the issues were resolved, since non-resolution would have prevented the processing of disability claims in an electronic environment. However, IDA documentation did not show the specific corrective actions taken, but rather just the date the issues were resolved. SSA policy requires critical discrepancies to be documented, monitored, and tracked for resolution on an IDA Matrix.[3]

- Documentation did not exist to support SSA's adherence to the validation testing sampling plan for both the Mississippi and Illinois DDS Validations. SSA documented the individual cases sampled in Mississippi and Illinois. However, SSA did not maintain documentation on how cases were sampled during the second week of the Mississippi DDS' Validation. In addition, SSA did not maintain

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[3] SSA, *IDA Protocol* (Revised June 2005), p. 6.

documentation that explained why certain cases were excluded from the Illinois DDS' sampling process. SSA policy requires documentation of the sampling process and explanations for excluding cases from sampling.[4]

- Documentation did not exist to show how critical discrepancies identified during the Mississippi and Illinois DDS' Validation testing were resolved. The summary reports for both the Mississippi and Illinois DDSs did not provide sufficient information to determine how the system errors were resolved. SSA policy states that summary reports will provide a narrative description of how critical discrepancies that resulted in an incomplete EF were resolved.[5]

The IDA Guide emphasizes the importance of clear, well-documented testing procedures and results that support the recommendation to move a DDS to the electronic processing of disability claims. After the experience gained from the Mississippi DDS' validation testing, SSA developed the IDA Collection System (IDACS) to capture and maintain documentation of issues identified during validation testing. Although IDACS was used during the Illinois DDS' Validation, documentation did not exist to show how critical discrepancies identified during the validation testing were resolved. Adequate documentation is necessary to ensure that all relevant information is provided to decision makers for their consideration in allowing a DDS to move to the EF.

Were IDA policies and procedures sufficient?

In general, we found the IDA policies and procedures were sufficient to determine that the Mississippi and Illinois DDSs were ready to process claims in an electronic environment. Specifically, the policies and procedures were designed to identify issues that could prevent the DDS from processing claims in a fully electronic environment and to ensure that the EF is complete.

However, we identified an area that should be reviewed as part of the IDA process to further ensure DDSs are ready to process disability claims in an electronic environment. Specifically, the IDA process should include a review of significant system problems identified and tracked in SSA's Change, Asset, and Problem Reporting System (CAPRS) for each DDS.

SSA's IDA procedures do not require the review or resolution of significant computer system problems identified in CAPRS prior to certifying the DDS. CAPRS identifies, tracks, and documents the resolution of the DDS' computer system problems. Significant computer system issues reported through CAPRS, if left unresolved, could negatively affect the DDS' ability to process disability claims electronically.

During our review of issues reported through CAPRS, we found that the Mississippi and Illinois DDSs had significant computer system issues identified prior to certification that

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[4] Guide to Conducting the DMA Review Portion of IDA Assessment Visit and IDA Validation (July 2005), page 7.

[5] IDA Protocol (Revised June 2005), page 16.

remained unresolved after certification. For example, nearly 3 months before Mississippi DDS' certification, CAPRS indicated the computing capacity of the minicomputer running the eDib applications was insufficient causing a significant slowdown in the processing of disability claims. Because IDA procedures do not require the resolution of significant system problems identified in CAPRS, SSA did not upgrade Mississippi's computer system until after the DDS was certified. The Illinois DDS experienced similar computer system problems and their computer system was also upgraded after certification. Based on the Mississippi and Illinois DDS' experiences, SSA has taken steps to ensure adequate computing capacity is available for processing the EF workloads at other DDSs. However, IDA procedures were not changed to ensure future significant system problems identified in CAPRS were resolved or scheduled for resolution prior to certifying a DDS.

WORKAROUND ISSUES

During our review, we identified issues that impact the efficiency of the EF, referred to by SSA as workaround issues. Workaround issues occur when a problem in the EF cannot be immediately resolved. So, an alternate procedure is temporarily established to allow the electronic claims process to continue. SSA records workaround issues and their resolutions on an IDA Matrix. We found that, after certification, the Mississippi and Illinois DDSs continued to use 10 and 23 workaround solutions implemented during the early stages of IDA testing, respectively. Workaround issues identified in the Validation stage of IDA testing are not recorded on this matrix. In addition, we found the IDA matrix was not periodically updated to reflect changes that eliminated the need for some of the workarounds. Therefore, we could not determine the total number of unresolved workaround issues for the DDSs.

Workaround solutions are cumbersome and adversely affect the efficiency of eDib because they require performance of additional steps—often outside the EF. For example, the Illinois DDS is unable to view the quality assurance unit's comments for about 7 percent of the electronic cases processed. These comments are part of the DDS' internal quality assurance process and are critical to the accuracy of disability determinations. The Illinois DDS established a process where the quality assurance unit documents their comments outside the EF and uses email notifications to alert disability examiners of cases that need attention. This adds time to the process and could affect the disability decision, if the workaround is not followed.

Another workaround example is the certified DDS' inability to record complete dates on electronic forms (eForms), electronic versions of SSA forms used for disability claims. The dates typed into an eForm do not convert properly when added to the EF. Approximately, 75 percent of all electronic disability claims processed by certified DDSs include an eForm and could be affected by this problem. As a workaround solution, users must use a calendar function to select the date, which adds time to the process. Using this workaround, the date converts properly and is added to the EF. SSA informed us that it is working with the software vendor to correct this problem.

SSA's rollout of eDib requires it to focus its resources on ensuring all DDSs implement an operational EF. As a result, SSA cannot focus on perfecting the EF in each certified DDS and workaround solutions must be used to keep eDib operational. Therefore, SSA needs a comprehensive plan to ensure workaround issues are identified and resolved timely. Although each DDS recorded workaround issues on an IDA Matrix, SSA did not have a comprehensive plan to ensure all workaround issues were resolved timely. SSA stated that it is developing a comprehensive plan that includes a list of all workaround issues in place at each certified DDS. This list will be used to monitor the resolution of workaround issues. In addition, SSA is developing a framework to prioritize new workaround issues. Finally, SSA has established a workgroup to oversee the resolution of workaround issues.

BEST PRACTICES

For the Illinois DDS, the success of the IDA certification process was due, in part, to pro-active practices implemented by the DDS prior to the IDA Validation Visit. For example, communication among Illinois DDS, the Chicago Regional Office, and SSA officials on the progress and problems of eDib implementation played a crucial role in keeping the DDS on schedule and organized. Also, extensive testing of the EF by users before the IDA Validation Visit was important to facilitate the testing process. Illinois also found that adequate training and the continued monitoring of the EF to ensure quick resolution of problems identified after certification played an important role in successfully implementing eDib.

SSA should share the best practices of the Illinois DDS, as well as the best practices of other certified DDSs, with DDSs that have not yet been certified. See Appendix D for Illinois DDS' best practices.

CONCLUSION AND RECOMMENDATIONS

SSA's IDA policies and procedures were generally effective to decide when the Mississippi and Illinois DDSs were ready to implement the EF. Issues that could affect the outcome of the disability decision and produce an incomplete EF were identified during the IDA process and were either resolved or a workaround was put in place prior to the certification of the Mississippi and Illinois DDSs. However, we identified areas where the IDA process could be strengthened. Furthermore, SSA needs to proactively resolve the EF workaround issues so the full efficiencies of the EF can be realized.

We recommend that SSA:

1. Maintain required documentation that clearly outlines the actions taken to resolve all significant issues identified during the IDA process and documentation that clearly reflects adherence to the IDA sampling process.

2. Resolve or schedule for resolution computer system problems reported in the CAPRS at the time of the validation visit.

3. Continue efforts to develop a comprehensive workaround resolution plan that includes prioritizing issues, establishing planned resolution dates for all workaround issues, and monitoring issues that exceed their planned resolution date.

4. Periodically distribute the best practices of certified DDSs to DDSs preparing for the IDA process.

AGENCY COMMENTS

SSA agreed with all of our recommendations. The full text of SSA's comments is included in Appendix E.

Patrick P. O'Carroll, Jr.

Appendices

APPENDIX A – Acronyms

APPENDIX B – IDA Process

APPENDIX C – Scope and Methodology

APPENDIX D – Illinois DDS's Best Practices

APPENDIX E – Agency Comments

APPENDIX F – OIG Contacts and Staff Acknowledgments

Acronyms

BPA	Business Process Analysis
CAPRS	Change, Asset, and Problem Reporting System
DDS	Disability Determination Services
DMA	Document Management Architecture
eDib	Electronic Disability
EF	Electronic Folder
eForm	Electronic Form
GAO	Government Accountability Office
IDA	Independence Day Assessment
IDACS	Independence Day Assessment Collection System
NARA	National Archives and Records Administration
SSA	Social Security Administration

IDA Process

The Independence Day Assessment (IDA) process is a four-step evaluation specifically designed to support the decision-making process for when the Social Security Administration (SSA) can rely solely on the Electronic Folder (EF) as the Agency's official record.

The **Assessment Visit** represents the first step of the IDA process. These on-site visits by the SSA IDA Team are designed to identify all issues that could prevent a component from processing cases in a fully electronic environment. The Assessment Visit is comprised of two parts: a Business Process Analysis (BPA) and a Document Management Architecture (DMA) review.

In the BPA, the Disability Determination Services (DDS) is asked to provide a written electronic business process to the IDA Team prior to the Assessment. In addition, the DDS is asked to identify any issues that affect its ability to work in an electronic environment. During the Assessment Visit, DDS staff provides a comprehensive walk-through of the business process, including a step-by-step demonstration. Issues identified during the analysis are documented, monitored, and tracked for resolution on a document called the IDA Matrix.

The DMA Review is a comprehensive review of claims folders where the paper claims folder is compared to the electronic claims folder. This testing detects discrepancies between information in the paper claim's folder and information in the EF and includes the review of contractor scanned paper documents, component casually scanned paper documents, front-end capture system/fax-in process documents, and electronic medical evidence documents. Issues and discrepancies identified in this review are documented, monitored, and tracked for resolution on the IDA Matrix.

Issues on the IDA Matrix are reviewed to determine their impact on the component's ability to operate in an electronic environment. Issues identified as "critical" are categorized in three ways:

- Showstopper Issues are problems that affect the outcomes of disability decisions and are considered adjudicatively significant (e.g., missing documents);
- Paper Issues are related to specific case types that are excluded from electronic processing;[6] and

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[6] Examples of case types that remain as paper claims are claims for childhood disability benefits and age 18 redeterminations (Modernized Supplemental Security Income Claims System).

- <u>Workaround Issues</u> occur when the current procedure or system does not allow a task to be accomplished efficiently, but alternate procedures, policies, or system functions allow paper source documents to be discarded and the EF to serve as the official Agency record.

Unresolved Showstopper Issues and Paper Issues require the retention of paper source documents and the maintenance of the paper folder as the Agency's official record. Unresolved Showstopper Issues prevent the component from becoming IDA certified. The IDA Team works with the component to resolve issues identified on the IDA matrix. All Showstopper Issues must be resolved before the Validation is scheduled.

Training is the second step of the IDA process. SSA developed a training matrix for each component involved in the electronic disability process. The matrices identify the training that should be conducted, who should receive the training, who should conduct the training and how the training should be conducted. SSA provides access to the required training materials. However, SSA depends on the individual components to ensure that all of the component's employees receive the required training. During the IDA process, the IDA Team asks component management if training was completed for all required employees. SSA also uses the validation testing as a tool for determining if adequate training was completed.

Meeting National Archives and Records Administration **(NARA) requirements** is the third step of the IDA process. SSA has prepared a document certifying that SSA's DMA used in the electronic disability (eDib) process is in compliance with the NARA standards set forth in Title 36 of the Code of Federal Regulations, Part 1234. We did not audit the content of the certification document, and nothing has come to our attention to indicate the systems did not meet the NARA recordkeeping requirements.

Validation is the fourth and last step of the IDA process. This step serves as a "go/no-go" decision point to determine if the Agency can rely solely on the EF as the Agency's official record and begin to eliminate paper source documents. The Validation ensures:

- Showstopper issues have been resolved;
- The computer system is working as expected;
- All components can access the EF; and
- EFs are complete.

Validation reviews focus on identifying discrepancies between the paper folder and the EF. During the Validation, the IDA Team documents all findings where the EF differs from the paper folder and identifies the type and cause of each discrepancy. Issues that could affect the disability decision by producing an incomplete EF (critical issues) must be resolved before the DDS proceeds to a fully electronic process. Once the Validation is complete and critical issues are resolved, the IDA team recommends certification of the DDS to process disability claims electronically, making the EF the Agency's official record (i.e., IDA certified).

Scope and Methodology

We evaluated the Social Security Administration's (SSA) Independence Day Assessment (IDA) procedures established to determine when Disability Determination Services (DDS) are ready to implement the electronic folder system of record under SSA's electronic disability (eDib) initiative. Our evaluation focused on SSA's establishment and adherence to adequate policies and procedures that would ensure all material deficiencies (ones that would affect the outcome of the disability decision) are corrected before a DDS is certified to operate in a paperless environment. We limited our review to the evaluation of the IDA process at the Mississippi and Illinois DDSs, the first two DDSs certified as ready to operate in a paperless environment.

To accomplish our objectives, we:

- Reviewed the policies and procedures related to the IDA certification process, including: (1) SSA's IDA Protocol that outlines the steps SSA takes to document the decision to certify a DDS; (2) SSA's *Program Operations Manual System* sections related to the policy, process and procedure changes made during the Agency's transition from a paper to an electronic environment; and (3) National Archives and Records Administration regulations for Electronic Records Management.

- Reviewed SSA IDA certification schedules, training requirements for each component involved in the electronic disability process, and other information disseminated by SSA to assist DDSs in preparing for IDA certification.

- Reviewed SSA documentation of the IDA process for the Mississippi and Illinois DDSs, such as documents that tracked problems identified and corrective actions taken, results of Validation testing, including detailed information for each case review as recorded in SSA's IDA Collection System, Changed Asset and Problem Reporting System tickets used to report and track the resolution of SSA systems issues, and SSA's eDib Systems Security Accreditation package.

- Discussed the IDA certification process with members of the IDA task force.

- Obtained information from the Mississippi and Illinois DDSs regarding their experiences with the IDA certification process.

We performed our fieldwork in the Kansas City, Missouri, Office of Audit, SSA Headquarters in Baltimore, Maryland, and the Illinois DDS in Springfield, Illinois, from May through October 2005. We conducted this evaluation in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

Illinois DDS's Best Practices

The Illinois Disability Determination Services (DDS) was very proactive during their rollout of the electronic disability initiative, developing their own validation testing process to ensure problems with the Electronic Folder (EF) were identified as quickly as possible. This proactive approach contributed to the Illinois DDS' successful implementation of the EF. The Illinois DDS Administrator provided a list of "Best Practices" that could assist other DDSs as they prepare for the Independence Day Assessment (IDA). The following are some of the best practices.

Ensure adequate communication among everyone involved before and during IDA validation testing.
- Early identification of one individual to act as a "Coordinator" of the project and have all aspects of the IDA certification process flow through this individual.
- Assemble a core team of managers from all areas of the DDS that meet regularly to assess rollout progress and plan next steps.
- Conduct bi-weekly meetings that include DDS supervisors and support staff supervisors.
- Inform all DDS staff of progress with testing and moving forward in the paperless process.
- Maintain a problem log and communicate issues to the legacy contractor (i.e., systems contractor) on a regular basis.

Conduct extensive testing before the IDA Validation Visit, ensuring experienced users are involved.
- Set up an in-house validation process as soon as possible.
- Use frontline supervisors as validation reviewers.
- Include the expertise of the primary users of the legacy system functions, and do not rely solely on computer systems staff to test the functionality.
- Include primary users in testing and in formulating changes to the business process.

Ensure all users receive adequate training.
- Train users in cross-component functions in the legacy system.
- Train newly hired employees to work only in the paperless environment.
- Medical Consultant training should take place in small sessions with adjudicative services "resource" people involved during each training session.
- Create desk guides for users and incorporate the guides into training.
- Enlist the talents of staff to serve as resource people in their area.

System Efficiency

- Monitor processing capacity on the minicomputer and on the various Windows servers and workstations.

Post Certification Activities

- Daily conference calls with Regional Office staff, DDS staff, and Area Directors offices to identify paperless problems immediately to facilitate early resolution.
- Enlist the assistance of Area Directors' office staff and Field Office supervisors to act as onsite liaisons at the DDS to help resolve problems of EF transmissions.
- Conduct a post IDA certification review in addition to the IDA Cohort Review. The Cohort Review is conducted immediately after the DDS is certified to confirm that claims transfer properly from one component to the next, the EF contains all required forms and information, and that EFs are not being converted to paper claims files.

Agency Comments

SOCIAL SECURITY

Date: March 15, 2006   Refer To: S1J-3

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

From: Larry W. Dye   /s/
            Chief of Staff

Subject: Office of the Inspector General (OIG) Draft Report, "The Social Security Administration's
            Independence Day Assessment" (A-07-06-26009)--INFORMATION

            We appreciate OIG's efforts in conducting this review. Our comments on the draft report are
            attached.

            Please let me know if you have any questions. Staff inquiries may be directed to
            Ms. Candace Skurnik, Director, Audit Management and Liaison Staff, at extension 54636.

            Attachment:
            SSA Comments

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "THE SOCIAL SECURITY ADMINISTRATION'S INDEPENDENCE DAY ASSESSMENT" (A-07-06-26009)

Thank you for the opportunity to review and provide comments on this OIG draft report concerning the Social Security Administration's (SSA) Independence Day Assessment (IDA) certification process for determining when a disability processing component is ready to implement fully electronic disability case processing. The OIG report provides a comprehensive account of the IDA certification process, and it concludes that SSA has established an effective process for ensuring a component's readiness to operate in an electronic environment. We believe our actions described below are responsive to the recommendations contained in this OIG report and will enhance the IDA certification process.

Recommendation 1

Maintain required documentation that clearly outlines the actions taken to resolve all significant issues identified during the IDA process and documentation that clearly reflects adherence to the IDA sampling process.

Comment

We agree. Lessons learned when initially applying the IDA certification process in Mississippi and Illinois have led to more extensive documentation of the IDA certification process in subsequent States. For example, during IDA validation for Missouri, we were able to provide OIG audit staff a preview of the new, improved version of the tool that we used to document validation findings for Missouri.

In addition, the SSA eDib Management System has been expanded to include IDA certification documentation, thereby assisting all SSA components involved in IDA certification by gathering information into one repository.

Recommendation 2

Resolve or schedule for resolution computer system problems reported in the Change, Asset, and Problem Reporting System (CAPRS) at the time of the validation visit.

Comment

We agree. Actions are underway to address the intent of this recommendation. CAPRS is designed to be a problem reporting and resolution repository for all information technology issues. In addition, a review of outstanding CAPRS issues has been incorporated into the IDA certification process. As a secondary level of control, IDA unresolved issues affecting electronic processing are now incorporated in the IDA Matrix, an IDA certification process tool for documenting, monitoring, and resolving IDA certification process issues. Such unresolved computer system issues are monitored throughout the IDA certification process.

Recommendation 3

Continue efforts to develop a comprehensive workaround resolution plan that includes prioritizing issues, establishing planned resolution dates for all workaround issues, and monitoring issues that exceed their planned resolution date.

Comment

We agree. Recognizing the impact of workaround issues on productivity and efficiency, we have documented and tracked them in order to facilitate their timely resolution. We have developed a multifaceted strategy for addressing workaround issues which includes the following actions.

- We have established a workgroup to address post-IDA certification issues that have arisen as more States have received IDA certification. The workgroup is developing a framework for assessing the criticality of such new issues and has oversight responsibility for resolving workaround issues.
- The National IDA Team has developed a comprehensive list of all issues identified in IDA certification process visits to date. The team monitors such issues and works with the appropriate SSA components to facilitate resolution of all IDA issues, including workaround issues. As part of this effort, the team is developing an accessible database format to house the National IDA Matrix.
- Where feasible, we continue to immediately address specific workaround issues as they arise. For example, we have resolved various workaround issues through enhanced functionality included in new software releases or through policy instructions.
- We plan to institute a series of national SSA cross-component conference calls that will focus on IDA certification process best practices, including best practices concerning resolution of workaround issues.

Recommendation 4

Periodically distribute the best practices of certified DDSs to DDSs preparing for the IDA process.

Comment

We agree. As noted in the comments for recommendation 3, we are planning to institute national conference calls that will include sharing of IDA certification best practices. In addition, we will regularly update the National IDA Website to provide easy access to tips and best practice information from SSA offices throughout the country (including links to SSA Regional websites, IDA checklists and other tools). Business process documents for States that have started or completed the IDA process are already available on the National IDA Website for new States to use as they prepare and develop their own electronic business process.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Mark Bailey, Director, Kansas City Audit Division (816) 936-5591

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Acknowledgments

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