

*Audit Report*

Accuracy of Disability Entitlement  
Dates for Primary Beneficiaries Who  
Previously Filed Disability Claims



# Office of the Inspector General

## SOCIAL SECURITY ADMINISTRATION

# MEMORANDUM

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration accurately established entitlement dates for primary beneficiaries who applied for Disability Insurance Benefits in Fiscal Years 2015 and 2016 and had previously filed Disability Insurance Benefits claims.

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.

Gale Stallworth Stone

## Attachment

# Accuracy of Disability Entitlement Dates for Primary Beneficiaries Who Previously Filed Disability Claims

## A-07-18-50257



December 2018

Office of Audit Report Summary

### Objective

To determine whether the Social Security Administration (SSA) accurately established entitlement dates for primary beneficiaries who applied for Disability Insurance Benefits (DIB) in Fiscal Years (FY) 2015 and 2016 and had previously filed DIB claims.

### Background

Entitlement to DIB can begin when a claimant is disabled under SSA's rules; obtains DIB insured status; and, if applicable, has served a waiting period. If a claimant was eligible for benefits before he/she filed an application, SSA may allow retroactive entitlement. When SSA pays retroactive DIB, it must offset the DIB by the amount of any Supplemental Security Income (SSI) paid for the same period.

From 1 segment of the Master Beneficiary Record, we identified 13,825 primary beneficiaries who submitted their applications for DIB in FYs 2015 and 2016, received a DIB allowance, and had a prior period of DIB or were previously denied DIB. From this population, we reviewed a random sample of 200 beneficiaries to determine whether their DIB entitlement dates were accurate.

### Findings

SSA employees did not accurately establish DIB entitlement dates for 23 (12 percent) of our 200 sampled beneficiaries. Employees established incorrect entitlement dates because they did not accurately evaluate all relevant evidence, appropriately identify retroactive entitlement based on prior filings, or correctly calculate one beneficiary's insured period. As a result, we identified improper payments of \$373,906 related to 23 beneficiaries (\$291,076 in underpayments to 20 beneficiaries and \$82,830 in overpayments to 3 beneficiaries).

Of the 23 beneficiaries who had inaccurate entitlement dates, 11 received SSI during months they should have also received DIB. As a result, SSA paid these 11 beneficiaries \$101,073 more in SSI payments than they were due. In total, we identified \$474,979 in improper DIB and SSI payments. Accordingly, we project SSA established incorrect entitlement dates that resulted in almost \$657 million in DIB and SSI improper payments. After we offset the improper DIB and SSI payments, the financial impact to the sampled beneficiaries was \$272,833. Therefore, we project the resulting financial impact to beneficiaries was about \$377 million.

### Recommendations

We made four recommendations to improve the accuracy of disability entitlement dates for beneficiaries who previously filed disability claims and take appropriate action on the errors we identified.

SSA agreed with our recommendations.

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## **ABBREVIATIONS**

C.F.R.	Code of Federal Regulations
DI	Disability Insurance
DIB	Disability Insurance Benefit
FY	Fiscal Year
MBR	Master Beneficiary Record
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSI	Supplemental Security Income
U.S.C.	United States Code

## OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) accurately established entitlement dates for primary beneficiaries who applied for Disability Insurance Benefits (DIB) in Fiscal Years (FY) 2015 and 2016 and had previously filed DIB claims.

## BACKGROUND

SSA administers two programs to provide benefits based on disability: Disability Insurance (DI) and Supplemental Security Income (SSI). The DI program pays DIB to insured workers and their families if the worker becomes disabled.<sup>1</sup> SSI is a means-tested program that provides a minimum level of income to financially needy individuals who are aged, blind, or disabled.<sup>2</sup> SSI is intended to be a program of last resort. As such, the *Social Security Act* requires that SSI applicants and recipients pursue other benefit programs, including DIB, if they are eligible.<sup>3</sup> Entitlement to DIB can begin when a claimant is disabled under SSA's rules; obtains DIB insured status; and, if applicable, has served a waiting period.

- **Definition of Disability:** Claimants must have a medically determinable impairment that has lasted or is expected to last at least 1 year or result in death and prevents them from engaging in substantial gainful activity.<sup>4</sup>
- **Insured Period:** Claimants must have the required amount of earnings, measured in quarters of coverage, within an established timeframe.<sup>5</sup>
- **Waiting Period:** The established onset date for the claimant's disability is the earliest date the claimant was disabled under SSA's rules and insured for DIB.<sup>6</sup> The claimant must serve a 5-month waiting period after the established onset date before entitlement begins, though

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<sup>1</sup> *Social Security Act*, 42 U.S.C. § 423 (govinfo.gov 2016); 20 C.F.R. § 404.316 (govinfo.gov 2018).

<sup>2</sup> *Social Security Act*, 42 U.S.C. §§ 1381, 1381a (govinfo.gov 2016); 20 C.F.R. §§ 416.101, 416.110 (govinfo.gov 2018).

<sup>3</sup> *Social Security Act*, 42 U.S.C. § 1382 (e)(2) (govinfo.gov 2016); 20 C.F.R. § 416.210 (govinfo.gov 2018); SSA, *POMS*, SI 00510.001, A (December 18, 2015).

<sup>4</sup> *Social Security Act*, 42 U.S.C. §§ 423(d)(1), 1382c(a)(3)(A) (govinfo.gov 2016). Substantial gainful activity is the performance of significant physical and/or mental activities in work for pay or profit or in work of a type generally performed for pay or profit. 20 C.F.R. §§ 404.1572 and 416.972 (govinfo.gov 2018); SSA, *POMS*, DI 10501.001 (January 5, 2007).

<sup>5</sup> 20 C.F.R. § 404.130 (govinfo.gov 2018); SSA, *POMS*, RS 00301.101 (August 9, 2011) and RS 00301.120 (August 18, 2004).

<sup>6</sup> Titles II and XVI: Determining the Established Onset Date in Disability Claims, 83 Fed. Reg. 49,613 (October 2, 2018); SSA, *POMS*, DI 25501.200, A (August 10, 2015) and DI 25501.320, A (September 24, 2015).

certain exclusions to the waiting period may apply.<sup>7</sup> For example, an exclusion to the 5-month waiting period may apply if the claimant had a prior period of disability.<sup>8</sup>

SSA establishes a claimant's entitlement date as the first month in which he/she meets all entitlement requirements.<sup>9</sup> If a claimant was eligible for certain benefits before he/she filed an application, SSA may allow retroactive entitlement.<sup>10</sup> SSA can establish retroactive entitlement up to 12 months before the claimant filed the application.<sup>11</sup> Additionally, under certain circumstances, SSA may reopen and revise the determination on a prior claim.<sup>12</sup> When an individual applies for benefits, the adjudicator must identify prior claims and review them for information material to the new claim.<sup>13</sup> If SSA allows DIB for a beneficiary who alleged he/she was disabled in a prior DIB, SSI, or retirement application, SSA must consider reopening the prior determination.<sup>14</sup> Additionally, SSA generally must adopt a prior favorable determination or decision for the same period on a new claim unless it can reopen the prior favorable determination or decision.<sup>15</sup>

After SSA establishes DIB entitlement, it makes payment adjustments if the individual is eligible to receive DIB and SSI at the same time, known as concurrent entitlement.<sup>16</sup> Since SSI recipients are subject to income limitations, SSA considers DIB as income when it determines a recipient's SSI eligibility and payment amount.<sup>17</sup> Thus, concurrently entitled beneficiaries may be due less SSI because of their DIB entitlement. Further, if SSA pays retroactive DIB, it must offset the DIB by the amount of any SSI paid for the same period.<sup>18</sup>

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<sup>7</sup> 20 C.F.R. § 404.320(b)(4) (govinfo.gov 2018); SSA, *POMS*, DI 10105.070, A (March 2, 2011) and DI 25501.300 (April 19, 2017).

<sup>8</sup> SSA, *POMS*, DI 10105.075 (August 3, 2012).

<sup>9</sup> 20 C.F.R. § 404.316(a) (govinfo.gov 2018).

<sup>10</sup> 42 U.S.C. § 423(b) (govinfo.gov 2017); 20 C.F.R. § 404.621 (govinfo.gov 2018); SSA, *POMS*, GN 00204.030, A (February 26, 2018).

<sup>11</sup> 42 U.S.C. § 423(b) (govinfo.gov 2017); 20 C.F.R. § 404.621 (govinfo.gov 2018); SSA, *POMS*, GN 00204.030, E (February 26, 2018) and DI 10105.015, sec. B (May 10, 2012).

<sup>12</sup> SSA, *POMS*, DI 27501.005 (August 15, 2012).

<sup>13</sup> SSA, *POMS*, GN 01010.030, A (December 29, 2017).

<sup>14</sup> SSA, *POMS*, DI 25501.250 (July 6, 2015), DI 27505.001 (September 19, 2011), and DI 27510.005, C (April 24, 2013).

<sup>15</sup> SSA, *POMS*, DI 11011.001, A (February 18, 2015); SSA, *POMS*, DI 11011.005 (February 18, 2015).

<sup>16</sup> SSA, *POMS*, GN 02610.005 (April 25, 2012).

<sup>17</sup> 20 C.F.R. § 416.1121(a) (govinfo.gov 2018); SSA, *POMS*, SI 00810.001, B (September 26, 2011) and SI 00830.210, A.1 (November 17, 2017).

<sup>18</sup> SSA, *POMS*, GN 02610.005, A (April 25, 2012).

From 1 segment of the Master Beneficiary Record (MBR),<sup>19</sup> we identified 13,825 primary beneficiaries<sup>20</sup> who submitted their applications for DIB in FYs 2015 and 2016, received a DIB allowance, and had a prior period of DIB or were previously denied DIB.<sup>21</sup> From this population, we reviewed a random sample of 200 beneficiaries to determine whether their DIB entitlement dates were accurate.

## RESULTS OF REVIEW

SSA employees did not accurately establish DIB entitlement dates for 23 (12 percent) of the 200 beneficiaries we reviewed who had previous DIB filings.<sup>22</sup> This occurred because employees did not accurately evaluate all relevant evidence, appropriately identify retroactive entitlement based on prior filings, or correctly calculate one beneficiary's insured period. As a result, we identified improper payments of \$373,906 related to the 23 beneficiaries (\$291,076 in underpayments to 20 beneficiaries and \$82,830 in overpayments to 3 beneficiaries). Of the 23 beneficiaries who had inaccurate entitlement dates, 11 received SSI during months they should have also received DIB. As a result, SSA paid these 11 beneficiaries \$101,073 more in SSI payments than they were due. In total, we identified \$474,979 in improper DIB and SSI payments. We project SSA established incorrect entitlement dates for almost 32,000 beneficiaries, which resulted in almost \$657 million in DIB and SSI improper payments.<sup>23</sup> After we offset the improper DIB and SSI payments, the financial impact to 22 beneficiaries<sup>24</sup> was \$272,833.<sup>25</sup> Therefore, we project the resulting financial impact to approximately 30,000 beneficiaries was about \$377 million.

## Reasons for Inaccurate Entitlement Dates

SSA employees did not accurately establish DIB entitlement dates for 23 (12 percent) of the 200 beneficiaries we reviewed who had previous DIB filings. We identified three reasons for the inaccurate entitlement dates: employees did not accurately evaluate all relevant evidence, appropriately identify retroactive entitlement based on prior filings, or correctly calculate one beneficiary's insured period (see Table 1).

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<sup>19</sup> The MBR is divided into 20 representative segments.

<sup>20</sup> A primary beneficiary is a Social Security numberholder upon whose earnings record SSA is paying benefits.

<sup>21</sup> See Appendix A for the scope and methodology of our review.

<sup>22</sup> We provided the 23 cases to SSA for review and incorporated their comments where applicable.

<sup>23</sup> See Appendix B for our sampling methodology and results.

<sup>24</sup> After we offset the improper DIB and SSI payments, one beneficiary was not financially impacted.

<sup>25</sup> The financial impact is \$373,906 in DIB improper payments less \$101,073 in SSI overpayments.

**Table 1: Reasons for Inaccurate Entitlement Dates**

Reason	Number of Beneficiaries	Total Improper Payments
Inaccurate Evidence Evaluation	16	\$229,295
Unidentified Retroactive Entitlement	6	\$221,373
Insured Period Miscalculation	1	\$24,311
<b>Total</b>	<b>23</b>	<b>\$474,979</b>

### *Inaccurate Evidence Evaluation*

Employees overlooked or inaccurately evaluated evidence from SSA's systems and records when they determined DIB entitlement dates for 16 beneficiaries. Employees must review evidence from prior determinations because it may be significant to the evaluation and determination of current applications.<sup>26</sup> To do so, employees manually import evidence from prior claims into current electronic folders. Further, employees must analyze all evidence and consider its completeness, relevance, internal consistency, relationship with other evidence, and consistency with other evidence.<sup>27</sup> However, employees did not always review evidence from prior claims or evaluate evidence and case facts in current electronic folders according to policy.

For example, employees incorrectly established a later DIB entitlement date for one beneficiary because they overlooked medical records from a prior application that supported an earlier entitlement date. Because of this oversight, SSA set the DIB entitlement date as February 2015. However, the medical records from the prior application documented signs, symptoms, and laboratory findings that supported the progression of the beneficiary's impairment. Based on this evidence, SSA should have set the DIB entitlement date as May 2014. Therefore, the beneficiary should have been entitled for an additional 9 months and received \$11,481 more in DIB. Since the beneficiary was concurrently entitled to DIB and SSI, the beneficiary received \$2,419 more in SSI than would have been due based on the earlier DIB entitlement date. Thus, the combined DIB and SSI improper payments totaled \$13,900.

In FYs 2017 and 2018, SSA provided employees with training and resources that addressed evidence review and evaluation. However, to prevent future errors involving evidence from prior claims, SSA should determine whether enhancements to the electronic folder to automatically identify and import certain information from prior claims would improve the DIB claims process.

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<sup>26</sup> SSA, *POMS*, DI 81020.030 (February 7, 2012).

<sup>27</sup> SSA, *POMS*, DI 24515.001, C (June 20, 2013).

## ***Unidentified Retroactive Entitlement***

Employees did not establish the earliest retroactive entitlement date for six beneficiaries. If a claimant has a protective filing date, SSA identifies retroactive entitlement based on that date. In broad terms, a protective filing date is the first time a claimant contacts SSA to file a claim for disability or retirement. This date may be earlier than the date SSA receives the application.<sup>28</sup> SSA can establish the DIB entitlement date up to 12 months before the protective filing date.<sup>29</sup> However, SSA employees did not always identify retroactive entitlement based on prior claims.

For example, one beneficiary applied for SSI in August 2014 and began receiving payments in September 2014. In December 2014, the beneficiary applied for DIB. SSA determined disability began in March 2013 and established the entitlement date as December 2013—12 months before the DIB application. However, the beneficiary's August 2014 SSI application established a filing for all other applicable SSA benefits, including DIB.<sup>30</sup> Therefore, after serving a 5-month waiting period, the beneficiary should have been entitled to DIB in September 2013. In total, the beneficiary should have been entitled for an additional 3 months and received \$3,495 more in DIB. SSA should determine the feasibility of expanding existing screening tools in the DIB claims process to identify retroactive entitlement based on prior filings.

## ***Insured Period Miscalculation***

An employee incorrectly calculated the insured period for one beneficiary. SSA identifies the insured period to establish the entitlement date.<sup>31</sup> The insured period begins when the claimant has the required amount of earnings (quarters of coverage) within the applicable timeframe.<sup>32</sup> These requirements are different for blind and non-blind, disabled individuals. Specifically, the computation of insured periods for blind individuals requires a less extensive employment history and does not mandate recent work.<sup>33</sup>

In this instance, the employee identified the insured period for non-blind individuals for a claimant who alleged blindness. Based on the incorrect insured period, SSA established the entitlement date as March 2014. However, the employee should have identified the insured period for statutorily blind individuals, which supported an entitlement date of September 2011. Therefore, the beneficiary should have been entitled for an additional 30 months and received \$17,712 more in DIB. Since the beneficiary was concurrently entitled to DIB and SSI, the

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<sup>28</sup> SSA, *POMS*, GN 00204.010, A (March 7, 2014).

<sup>29</sup> SSA, *POMS*, DI 10105.015, B (May 10, 2012).

<sup>30</sup> SSA, *POMS*, GN 00204.020 (February 3, 2017).

<sup>31</sup> SSA, *POMS*, DI 25501.300, A.6-7 (April 19, 2017).

<sup>32</sup> SSA, *POMS*, RS 00301.120 (August 18, 2004).

<sup>33</sup> SSA, *POMS*, DI 26005.001, C (January 11, 2016).

beneficiary received \$6,599 more in SSI than would have been due based on the earlier DIB entitlement date. Thus, the combined DIB and SSI improper payments totaled \$24,311.

## Improper Payments Caused by Inaccurate Entitlement Dates

The inaccurate entitlement dates resulted in \$474,979 in improper payments related to 23 (12 percent) of the 200 beneficiaries in our sample (\$373,906 in improper DIB payments and \$101,073 in improper SSI payments). Specifically, 20 beneficiaries should have received \$291,076 in additional DIB based on an earlier entitlement date. In addition, three beneficiaries received \$82,830 in DIB to which they were not entitled because they did not meet SSA's definition of disability.<sup>34</sup> Finally, 11 of the 23 beneficiaries who had inaccurate entitlement dates received SSI during months they should have also received DIB. As a result, SSA paid these 11 beneficiaries \$101,073 more in SSI payments than they were due. In total, we project SSA established incorrect entitlement dates for almost 32,000 beneficiaries that resulted in almost \$657 million in improper DIB and SSI payments.

After we offset the improper DIB and SSI payments, the net financial impact to 22<sup>35</sup> of the 23 beneficiaries who had inaccurate entitlement dates was \$272,833.<sup>36</sup> Therefore, we project the resulting financial effect on approximately 30,000 beneficiaries was about \$377 million.

SSA should take appropriate actions to address the inaccurate entitlement dates for the 20 beneficiaries we identified.<sup>37</sup> Based on the results of its corrective actions for the errors we identified, SSA should determine whether it needs to review additional beneficiaries who had prior DIB filings and may have incorrect entitlement dates.

## CONCLUSIONS

Of the 200 beneficiaries we reviewed who had prior DIB filings, SSA established inaccurate entitlement dates for 23 (12 percent). Accordingly, we project SSA established incorrect entitlement dates for almost 32,000 beneficiaries, which resulted in almost \$657 million in improper DIB and SSI payments. These inaccurate entitlement dates also had a financial impact on most of the beneficiaries after we offset the improper DIB and SSI payments. Specifically, we project approximately 30,000 beneficiaries had a financial impact of about \$377 million. To

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<sup>34</sup> We calculated improper payments through July 2018 for two of the three beneficiaries. SSA will pay them an additional \$27,960 in improper DIB payments over the next 12 months and continue to make improper payments until it takes corrective action to cease the beneficiaries' DIB. For the third beneficiary, we calculated improper payments through September 2016 when his DIB was suspended. SSA will make additional improper payments if it does not take corrective action to cease the beneficiary's DIB before his payments resume.

<sup>35</sup> After we offset the improper DIB and SSI payments, one beneficiary was not financially impacted.

<sup>36</sup> The financial impact is \$373,906 in DIB improper payments less \$101,073 in SSI overpayments.

<sup>37</sup> Based on our review, SSA took corrective action for 3 of the 23 beneficiaries who had inaccurate entitlement dates.

avoid financially disadvantaging disabled beneficiaries and improperly allocating resources from its Trust Funds, SSA must improve the accuracy of DIB entitlement date establishment.

## **RECOMMENDATIONS**

We recommend SSA:

1. Determine whether enhancements to the electronic folder to automatically identify and import certain information from prior claims would improve the DIB claims process.
2. Determine the feasibility of expanding existing screening tools in the DIB claims process to identify retroactive entitlement based on prior filings.
3. Take appropriate actions to address 20 beneficiaries we identified who had inaccurate entitlement dates.
4. Determine whether it needs to review additional beneficiaries who had prior DIB filings and may have incorrect entitlement dates.

## **AGENCY COMMENTS**

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



Rona Lawson  
Assistant Inspector General for Audit

# *APPENDICES*

## Appendix A – SCOPE AND METHODOLOGY

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To accomplish our objective, we:

- Reviewed applicable sections of the *Social Security Act*, Code of Federal Regulations, and Social Security Administration's (SSA) Program Operations Manual System.
- Reviewed prior Office of the Inspector General Reports.
- Obtained a data extract from Segment 11 of the Master Beneficiary Record (MBR)<sup>1</sup> of 13,825 primary beneficiaries<sup>2</sup> who
  - had application receipt dates between October 1, 2014 and September 30, 2016;
  - received a Disability Insurance Benefits (DIB) allowance; and
  - had a prior period of DIB or were previously denied DIB.
- Reviewed a random sample of 200 beneficiaries to determine whether their DIB entitlement dates were accurate.<sup>3</sup> To do so, we reviewed information from the following SSA systems and programs.
  - MBR
  - Supplemental Security Record
  - Modernized Claims System
  - Claims File Unit Interface
  - Paperless Read Only Query System
  - Electronic Folder
  - Work History Assistant Tool
  - Disability Insured Status Calculator Online
- Calculated improper payments for each beneficiary who had an inaccurate entitlement date.<sup>4</sup> Specifically, we compared the amount payable to the beneficiary based on the accurate date of entitlement to the amount paid based on the entitlement date established on the MBR. If the beneficiary was concurrently entitled to Supplemental Security Income (SSI) and DIB, we used the SSI eComputations application to calculate the amount of SSI the beneficiary should not have received based on the accurate DIB entitlement.

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<sup>1</sup> The MBR is divided into 20 representative segments.

<sup>2</sup> A primary beneficiary is a Social Security numberholder upon whose earnings record SSA is paying benefits.

<sup>3</sup> See Appendix B for our sampling methodology and results.

<sup>4</sup> For beneficiaries who have ongoing payments, we calculated improper payments through July 2018.

We conducted our review between January and July 2018 in Kansas City, Missouri. We determined the data used for this audit were sufficiently reliable to meet our objective. 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 objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## **Appendix B – SAMPLING METHODOLOGY AND RESULTS**

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From our population of 13,825 beneficiaries,<sup>1</sup> we selected a random sample of 200 beneficiaries for review.

**Table B–1: Population and Sample Size**

Description	Number of Beneficiaries
Population Size (1 segment)	13,825
Sample Size	200
Estimated Total Population (Population Size x 20 segments) <sup>2</sup>	276,500

Of the 200 sampled beneficiaries, the Social Security Administration (SSA) established inaccurate Disability Insurance Benefit (DIB) entitlement dates for 23 (12 percent), resulting in improper DIB and Supplemental Security Income (SSI) payments of \$474,979. Accordingly, we project SSA established incorrect entitlement dates for 31,800 beneficiaries, which resulted in improper DIB and SSI payments of almost \$657 million (see Table B–2).

**Table B–2: Improper Payments and Projections**

Description	Number of Beneficiaries	Improper Payment Amount
Sample Results (1 segment)	23	\$474,979
Projected Quantity (1 segment)	1,590	\$32,832,923
Projection – Lower Limit	1,108	\$15,120,648
Projection – Upper Limit	2,193	\$50,545,199
Population Estimate (Projected Quantity x 20 segments)	31,800	\$656,658,460

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

Of the 23 beneficiaries who had inaccurate DIB entitlement dates, the financial impact to 22 beneficiaries was \$272,833 after we offset the improper DIB and SSI payments.<sup>3</sup> Accordingly, we project the financial impact resulting from incorrect DIB entitlement dates was about \$377 million for approximately 30,000 beneficiaries (see Table B–3).

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<sup>1</sup> See Appendix A for the scope and methodology of our review.

<sup>2</sup> The Master Beneficiary Record is divided into 20 representative segments based on the last 2 digits of the beneficiaries' Social Security number. One segment of the Master Beneficiary Record represents 5 percent of the total population of beneficiaries. Because each segment contains similar characteristics, the results of the audit are representative of the entire population.

<sup>3</sup> After we offset the improper DIB and SSI payments, one beneficiary was not financially impacted.

**Table B–3: Financial Impact and Projections**

Description	Number of Beneficiaries Financially Impacted	Amount of Financial Impact
Sample Results (1 segment)	22	\$272,833
Projected Quantity (1 segment)	1,521	\$18,859,581
Projection – Lower Limit	1,049	\$9,810,516
Projection – Upper Limit	2,115	\$27,908,646
Population Estimate (Projected Quantity x 20 segments)	30,420	\$377,191,620

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

## **Appendix C – AGENCY COMMENTS**

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### **SOCIAL SECURITY**

#### **MEMORANDUM**

Date: November 27, 2018 Refer To: S1J-3

To: Gale S. Stone  
Acting Inspector General

*Stephanie Hall*

From: Stephanie Hall  
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Accuracy of Disability Entitlement Dates for Primary Beneficiaries Who Previously Filed Disability Claims" (A-07-18-50257) --  
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 (OIG) DRAFT REPORT, "Accuracy of Disability Entitlement Dates for Primary Beneficiaries Who Previously Filed Disability Claims" (A-07-18-50257)**

**GENERAL COMMENTS**

To improve the adjudication of disability insurance benefits claims, we will evaluate how we can enhance the electronic disability folder to ensure adjudicators are reviewing all relevant evidence.

Below are our responses to the recommendations.

**Recommendation 1**

Determine whether enhancements to the electronic folder to automatically identify and import certain information from prior claims would improve the DIB claims process.

Response

We agree.

**Recommendation 2**

Determine the feasibility of expanding existing screening tools in the DIB claims process to identify retroactive entitlement based on prior filings.

Response

We agree.

**Recommendation 3**

Take appropriate actions to address 20 beneficiaries we identified who had inaccurate entitlement dates.

Response

We agree.

**Recommendation 4**

Determine whether it needs to review additional beneficiaries who had prior DIB filings and may have incorrect entitlement dates.

Response

We agree.

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