



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

*Audit Report*

Accuracy of Supplemental Security  
Income Payments to Recipients with  
Manually Deemed Income

*A-07-18-50295 | August 2018*

**MEMORANDUM**

**Date:** August 30, 2018

**Refer To:**

**To:** The Commissioner

**From:** Acting Inspector General

**Subject:** Accuracy of Supplemental Security Income Payments to Recipients with Manually Deemed Income (A-07-18-50295)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration correctly computed Supplemental Security Income payments for recipients with manually deemed income.

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 Supplemental Security Income Payments to Recipients with Manually Deemed Income

## A-07-18-50295



August 2018

Office of Audit Report Summary

### Objective

To determine whether the Social Security Administration (SSA) correctly computed Supplemental Security Income (SSI) payments for recipients with manually deemed income.

### Background

SSI recipients must meet certain income and resource limits for eligibility. SSA presumes members of a family will use part of their income to take care of some of an SSI recipient's needs when they are living in the same household. Accordingly, SSA considers, or "deems," a portion of certain family members' income when determining whether an individual is eligible for SSI payments. However, SSI recipients and their family members do not always report income information timely. Therefore, SSA may obtain information from other sources.

In some cases, SSA's automated system cannot properly calculate the amount of income SSA should deem to an SSI recipient. Therefore, the amount of deemed income must be manually calculated.

From 1 segment of the Supplemental Security Record, we identified a population of 3,827 SSI recipients who had manually deemed income between January 2014 and May 2017.

### Findings

From a sample of 100 recipients we reviewed who had manually deemed income, SSA did not correctly compute SSI payments for 46. This occurred because SSA did not correctly develop all income information when the deemors reported it or it became available from other sources if the deemors did not report it timely, did not consider the correct family members in the household, or made various other errors. Further, SSA's policy did not require that a second employee review manually deemed computations.

SSA improperly paid the 46 recipients \$136,569. Specifically, SSA overpaid 12 recipients \$33,375, underpaid 9 recipients \$7,734, and both over- and underpaid 25 recipients \$95,460. Accordingly, we project SSA improperly paid approximately \$105 million in SSI payments to 35,200 SSI recipients with manually deemed income.

### Recommendations

We recommend SSA:

1. Take appropriate action to address the 46 recipients we identified with payment errors.
2. Issue a reminder to employees on computing SSI payments for recipients who have manually deemed income, focusing on when and how to develop income and consider family members.
3. Consider implementing a secondary review process for cases that require manual deeming.

SSA agreed with our recommendations.

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## ABBREVIATIONS

C.F.R.	Code of Federal Regulations
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) correctly computed Supplemental Security Income (SSI) payments for recipients with manually deemed income.

## BACKGROUND

SSI is a needs-based program for aged, blind, or disabled individuals.<sup>1</sup> Recipients must meet certain income and resource limits for eligibility.<sup>2</sup> SSA presumes members of a family will use part of their income to take care of some of an SSI recipient's needs when they are living in the same household.<sup>3</sup> Accordingly, SSA considers, or "deems," a portion of certain family members' income when determining whether an individual is eligible for SSI payments.<sup>4</sup>

SSA requires that SSI recipients and certain family members report any changes, including income, that would affect recipients' eligibility or payment amount.<sup>5</sup> However, they do not always report necessary information timely.<sup>6</sup> Therefore, SSA does not rely solely on individuals' reports of income.<sup>7</sup> Other sources for obtaining information include wage information from an SSA-approved wage verification company, written statements from employers, and State or Federal income information from SSA's systems.<sup>8</sup>

In some cases, SSA's automated system cannot properly calculate the amount of income SSA should deem to an SSI recipient. Therefore, the amount of deemed income must be manually calculated.<sup>9</sup>

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<sup>1</sup> *Social Security Act*, 42 U.S.C. § 1381 (2016).

<sup>2</sup> *Social Security Act*, 42 U.S.C. § 1382(a) (2016); SSA, *POMS, SI-Supplemental Security Income*, ch. SI 005, subch. SI 00501.001, sec. B.1 (January 18, 2005).

<sup>3</sup> SSA, *POMS, SI-Supplemental Security Income*, ch. SI 013, subch. SI 01310.001, sec. A (October 21, 2014).

<sup>4</sup> 20 C.F.R. § 416.1160 (2017). SSA uses the same process to deem income from the sponsor of a noncitizen immigrant recipient.

<sup>5</sup> SSA, *POMS, SI-Supplemental Security Income*, ch. SI 013, subch. SI 01310.030 (August 14, 2008).

<sup>6</sup> SSA, *POMS, SI-Supplemental Security Income*, ch. SI 023, subch. SI 02310.005, sec. A (May 15, 2007).

<sup>7</sup> SSA, *POMS, SI-Supplemental Security Income*, ch. SI 008, subch. SI 00810.500 (February 16, 2010).

<sup>8</sup> SSA, *POMS, SI-Supplemental Security Income*, ch. SI 008, subch. SI 00820.130, sec. A (October 23, 2017).

<sup>9</sup> SSA has classified information regarding manual deeming as sensitive, not to be shared with the public. Therefore, we are not reporting on the specific situations and procedures for manual deeming.

From 1 segment of the Supplemental Security Record, we identified a population of 3,827 SSI recipients who had manually deemed income between January 2014 and May 2017. From this population, we reviewed a random sample of 100 SSI recipients to determine whether SSA correctly computed their SSI payments.<sup>10</sup>

## RESULTS OF REVIEW

SSA did not correctly compute SSI payments for 46 of the 100 recipients we reviewed who had manually deemed income, which resulted in \$136,569 in improper payments.<sup>11</sup> This occurred because SSA did not correctly develop all income information when the deemors reported it or it became available from other sources if the deemors did not report it timely, did not consider the correct family members in the household, or made various other errors. Further, SSA’s policy did not require that a second employee review manually deemed computations. Based on our sample results, we project SSA improperly paid approximately \$105 million in SSI payments to 35,200 SSI recipients with manually deemed income.<sup>12</sup>

### Reasons for Incorrectly Computed SSI Payments

SSA did not correctly compute SSI payments for 46 of the 100 recipients we reviewed who had manually deemed income. For these recipients, SSA did not correctly develop all income information available, did not consider the correct family members in the household, or made various other errors (see Table 1).

**Table 1: Reasons for Improper Payments**

Reason	Number of Recipients	Total Improper Payment Amount
Income Not Developed	24	\$88,848
Incorrect Family Members in Household Considered	9	\$14,195
Various Errors	13	\$33,526
<b>TOTAL</b>	46	\$136,569

<sup>10</sup> See Appendix A for our scope, methodology, and sample results.

<sup>11</sup> SSA overpaid 12 recipients \$33,375, underpaid 9 recipients \$7,734, and both over- and underpaid 25 recipients \$95,460.

<sup>12</sup> The \$105 million includes both over- and underpayments.

## *Income Not Developed*

For 24 recipients, SSA did not correctly develop all income information when the deemors reported it or it became available from other sources if the deemors did not report it timely. Other sources for obtaining income information include wage information from an SSA-approved wage verification company, written statements from employers, and State or Federal income information from SSA's systems.<sup>13</sup>

For example, a recipient lived with her spouse whose income SSA began manually deeming in March 2015. The spouse's employer provided income information for March through October 2015, and SSA estimated income for November and December 2015. However, SSA did not correct its estimates when actual income information became available for 2015. Therefore, the recipient was improperly paid \$244 for 2 months. In addition, the spouse provided a letter from his employer stating he was laid off beginning December 23, 2015, but he should report back on February 23, 2016 for a new employment start date. The spouse did not inform SSA when he returned to work in 2016 and 2017. Rather, after the end of each year, information became available in SSA's systems that showed the spouse had income from the same employer during those years. Although the income information later became available to SSA, it did not deem the income to the recipient.<sup>14</sup> As a result, the recipient was overpaid \$9,056 for 15 months.

## *Incorrect Family Members in Household Considered*

SSA did not consider the correct family members in the household for nine SSI recipients. SSA deems a spouse or parent's income for the months they are living in the same household as the SSI recipient.<sup>15</sup> SSA begins deeming the income the month after the spouse or parent begins living with the SSI recipient.<sup>16</sup> In addition, the presence of other children in a household can

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<sup>13</sup> SSA, *POMS, SI-Supplemental Security Income*, ch. SI 008, subch. SI 00820.130, sec. A (October 23, 2017). Many of these other sources provide delayed information. For example, some State income information is available quarterly. Therefore, SSA cannot develop the income information until it becomes available and SSA is aware it is available.

<sup>14</sup> SSA was not alerted the income information was available because of the circumstances of this case. However, based on the spouse's work history and likelihood of continued work, SSA should have identified the income after it became available and deemed it to the recipient.

<sup>15</sup> *Social Security Act*, 42 U.S.C. § 1382c(f) (2016).

<sup>16</sup> SSA, *POMS, SI-Supplemental Security Income*, ch. SI 008, subch. SI 00835.485, sec. B (September 19, 2014).



affect the payment amount for a child recipient.<sup>17</sup> However, SSA did not always consider the correct family members as being in the household for the correct months.

For example, a recipient was married in March 2014, and SSA started manually deeming the spouse's income in April 2014. When the couple separated in May 2015, SSA should have stopped deeming the spouse's income. However, SSA did not process the separation timely, and SSA continued deeming the spouse's income through August 2015. Further, after processing the separation, SSA did not correct the record to reflect the couple separated in May 2015, which caused SSA to continue deeming the spouse's wages to the recipient. As a result, SSA underpaid the recipient \$2,199 for 3 months.<sup>18</sup>

### *Various Errors*

SSA improperly paid 13 SSI recipients because it made various errors in the deeming calculation for the recipient. The errors included, but were not limited to, SSA incorrectly deeming benefits from the Department of Veterans Affairs,<sup>19</sup> inappropriately including cafeteria plan benefits as income,<sup>20</sup> and not deeming income correctly to a child recipient when there was an eligible parent in the household.<sup>21</sup>

For example, a child recipient lived with both parents—a father with income and a mother who was eligible for SSI payments. In this situation, SSA should have deemed the father's income to the mother first. When part of the father's income was high enough to make the mother ineligible for SSI, SSA should have deemed the remaining income to the child.<sup>22</sup> However, SSA did not always deem the correct amount of remaining income to the child. Consequently, the child was overpaid \$1,547 for 9 months and underpaid \$1,167 for 3 months.

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<sup>17</sup> SSA deducts an allocation for each child in the household who does not receive SSI. SSA, *POMS, SI-Supplemental Security Income*, ch. SI 013, subch. SI 01310.110, sec. D.3 (October 21, 2014). If two or more children live in the household and receive SSI, the amount of income deemed from the parents is divided equally among them. SSA, *POMS, SI-Supplemental Security Income*, ch. SI 013, subch. SI 01320.500, sec. D.2 (December 9, 2009).

<sup>18</sup> SSA underpaid the recipient \$455 for an additional month for a reason unrelated to considering the correct family members in the household.

<sup>19</sup> Veterans can receive a higher payment from the Department of Veterans Affairs if the veteran has a dependent. If the dependent receives SSI and lives with the veteran, SSA considers the higher portion of the payment as income to the dependent. SSA, *POMS, SI-Supplemental Security Income*, ch. SI 008, subch. SI 00830.314, secs. B.3 and C.3 (October 31, 2017).

<sup>20</sup> A cafeteria plan allows employees to choose from two or more qualified benefits, such as medical or dental plans. SSA does not consider these qualified benefits as income for SSI purposes. SSA, *POMS, SI-Supplemental Security Income*, ch. SI 008, subch. SI 00820.102 (January 16, 2018).

<sup>21</sup> If a child recipient lives in a household with both a parent who receives SSI and a parent who does not receive SSI, SSA deems income first to the parent receiving SSI; then, SSA deems any remaining income to the child. SSA, *POMS, SI-Supplemental Security Income*, ch. SI 013, subch. SI 01320.620 (December 23, 2013).

<sup>22</sup> See Footnote 21.

## Improper Payments Caused by Incorrect Manual Deeming

Of the 100 SSI recipients we reviewed who had manually deemed income, SSA improperly paid 46 a total of \$136,569 because it did not correctly compute their SSI payments. Specifically, SSA overpaid 12 recipients \$33,375, underpaid 9 recipients \$7,734, and both over- and underpaid 25 recipients \$95,460 (see Table 2).

**Table 2: Improper Payment Information**

Category	Number of Recipients	Amount Overpaid	Amount Underpaid	Total Improper Payment
Only Overpaid	12	\$33,375	\$0	<b>\$33,375</b>
Only Underpaid	9	\$0	\$7,734	<b>\$7,734</b>
Over- and Underpaid	25	\$56,492	\$38,968	<b>\$95,460</b>
<b>Total</b>	<b>46</b>	<b>\$89,867</b>	<b>\$46,702</b>	<b>\$136,569</b>

We project 35,200 SSI recipients who had manually deemed income were improperly paid approximately \$105 million because SSA did not correctly compute their SSI payments.<sup>23</sup> Accordingly, SSA should take appropriate action to address the 46 recipients we identified with payment errors.<sup>24</sup> SSA has an annual process for identifying SSI recipients with deemed income that requires manual computation.<sup>25</sup> According to SSA, this process will identify other SSI recipients with manually deemed income in our population that may require corrective action.

While SSA has a process to monitor cases that require manual computations and various review processes for SSI entitlement and payment accuracy, its policy did not require that a second employee review manual deeming computations. According to SSA, some cases with manual deeming involve creating a new record, which required a second review, including a review of the manual payment computations. In our sample of 100 recipients, only 19 had a secondary review. Further, SSA did not plan to automate the process for recipients who require manual deeming because such a change would be complex and require significant resources.

<sup>23</sup> See Appendix A, Table A-2.

<sup>24</sup> According to SSA's policy on administrative finality, it can revise SSI payment amounts within 1 year for any reason, within 2 years for good cause, or at any time if fraud or similar fault exists. Therefore, administrative finality may restrict SSA from addressing all improper payments we identified. SSA, *POMS, SI-Supplemental Security Income*, ch. SI 040, subch. SI 04070.010, sec. F.4 (March 24, 2017).

<sup>25</sup> SSA, *POMS, SI-Supplemental Security Income*, ch. SI 023, subch. SI 02305.017, sec. F.1 (September 28, 2017).

The *Bipartisan Budget Act of 2015* granted SSA authority to implement systems intended to reduce occurrences of improper payments caused by earnings.<sup>26</sup> Specifically, section 824 allows SSA to enter into data-exchange agreements with payroll providers to give it access to payroll data for disabled individuals and any other person whose income or resources are material to the determination of the recipient's eligibility for such benefits. SSA expects to use this information to adjust earnings information and payment records more quickly to minimize or prevent improper payments.<sup>27</sup> However, SSA may face issues obtaining complete earnings data for individuals who do not have a Social Security number or who have irregular work histories. This includes those who work multiple jobs simultaneously, change jobs frequently, or work seasonal jobs.

Given the error-prone nature of this manual workload and the resulting improper payments, SSA should issue a reminder to employees on computing SSI payments for recipients with manually deemed income, focusing on when and how to develop income and consider family members. In addition, SSA should consider implementing a secondary review process for cases that require manual deeming.

## CONCLUSIONS

Of the 100 SSI recipients we reviewed who had manually deemed income, SSA incorrectly paid almost half, which resulted in \$136,569 in improper payments. Accordingly, from January 2014 through May 2017, we estimate SSA improperly paid 35,200 SSI recipients approximately \$105 million. These improper payments occurred because SSA did not correctly develop all income information when the deemors reported it or it became available from other sources, did not consider the correct family members in the household, or made various other errors.

## RECOMMENDATIONS

We recommend SSA:

1. Take appropriate action to address the 46 recipients we identified with payment errors.
2. Issue a reminder to employees on computing SSI payments for recipients who have manually deemed income, focusing on when and how to develop income and consider family members.
3. Consider implementing a secondary review process for cases that require manual deeming.

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<sup>26</sup> *Bipartisan Budget Act of 2015*, Pub. L. No. 114-74, § 824(a), 129 Stat. 584 (2015).

<sup>27</sup> SSA, *Congress Passes H.R. 1314, the Bipartisan Budget Act of 2015*, *Legislative Bulletin 114-8* (November 3, 2015).

## AGENCY COMMENTS

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

A handwritten signature in black ink that reads "Rona Lawson". The signature is written in a cursive style with a large initial 'R' and a long, sweeping tail.

Rona Lawson  
Assistant Inspector General for Audit

# *APPENDICES*

## Appendix A – SCOPE, METHODOLOGY, AND SAMPLE RESULTS

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.
- From 1 segment of the Supplemental Security Record, obtained a file of 3,827 Supplemental Security Income (SSI) recipients who had manually deemed income that started between January 2014 and May 2017.<sup>1</sup>
- Selected a random sample of 100 recipients from the population of 3,827 for review.

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

Description	Recipients
Population Size (1 segment)	3,827
Sample Size	100
Estimated Number of Recipients in Universe (Population Size x 20)	76,540

- To determine whether SSA correctly computed payments for SSI recipients who had manually deemed income, we reviewed information from the following SSA systems as well as information from SSA’s data-exchange agreement with The Work Number.<sup>2</sup>
  - Supplemental Security Record
  - Claims File User Interface
  - Electronic Folder
  - Detailed Earnings Query
  - Earnings Suspense File
  - National Directory of New Hires
  - Interstate Benefits Inquiry
  - Modernized Supplemental Security Income Claims System

<sup>1</sup> The last two digits of the Social Security number are randomly assigned and can contain digits “00 to “99.” These numbers are categorized into 20 segments. For this audit, we selected Social Security numbers ending in digits “80” to “84.”

<sup>2</sup> The Work Number is an SSA-approved wage verification company that maintains an up-to-date database of wage earners’ information. Upon wage earners’ authorization, SSA may request wage information from The Work Number to verify wages when pay slips are unavailable. SSA, *POMS, SI–Supplemental Security Income*, ch. SI 008, subch. SI 00820.147, sec. A and C.2 (July 7, 2016).

- Calculated the total amount payable to each recipient based on any actual earnings documented in SSA’s systems and The Work Number. We relied on the SSI eComputations application to calculate the amounts payable to the recipients.
- Compared our calculated amount payable to the amount shown as payable on the Supplemental Security Record for the same period.

Of the 100 sampled recipients who had manually deemed income, SSA improperly paid 46 a total of \$136,569. Accordingly, we project SSA did not correctly compute SSI payments for 35,200 recipients resulting in approximately \$105 million in improper payments.

**Table A–2: SSI Recipients with Improper Payments**

Description	Number of Recipients	Improper Payment Amount
Sample Results (1 segment)	46	\$136,569
Projected Quantity (1 segment)	1,760	\$5,226,496
Projection Lower Limit	1,439	\$3,482,879
Projection Upper Limit	2,089	\$6,970,112
Population Estimate (Projected Quantity x 20 segments)	35,200	\$104,529,920

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

We conducted our review between November 2017 and June 2018 in Kansas City, Missouri. The principal entity audited was the Office of Operations. We determined the data used for this audit were sufficiently reliable to meet our objective. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Appendix B – AGENCY COMMENTS

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### SOCIAL SECURITY

#### MEMORANDUM

Date: August 20, 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 Supplemental Security Income Payments to Recipients with Manually Deemed Income" (A-07-18-50295) -- 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 SUPPLEMENTAL SECURITY INCOME PAYMENTS TO RECIPIENTS WITH MANUALLY DEEMED INCOME” (A-07-18-50295)**

We base eligibility and payments for Supplemental Security Income (SSI) on timely reports of income, resources, and living arrangements. When recipients do not provide timely information, overpayments and underpayments may result. We use automation as much as possible to process reported changes, but there are some computations that require manual action. Some of these manual computations can be complex, and we will take steps to ensure that staff knows when and how to apply the computations correctly. Below are our responses to the recommendations. We also provided some technical comments at the staff level.

**Recommendation 1**

Take appropriate action to address the 46 recipients we identified with payment errors.

Response

We agree.

**Recommendation 2**

Issue a reminder to employees on computing SSI payments for recipients who have manually deemed income, focusing on when and how to develop income and consider family members.

Response

We agree.

**Recommendation 3**

Consider implementing a secondary review process for cases that require manual deeming

Response

We agree.

## MISSION

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