



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

*Audit Report*

Retirement Claim Denials Because of  
Lack of Insured Status

*A-09-14-34107 | January 2016*

**OIG** Office of the Inspector General  
SOCIAL SECURITY ADMINISTRATION

**MEMORANDUM**

**Date:** January 28, 2016

**Refer To:**

**To:** The Commissioner

**From:** Inspector General

**Subject:** Retirement Claim Denials Because of Lack of Insured Status (A-09-14-34107)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration properly denied retirement applications for lack of insured status.

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.



Patrick P. O'Carroll, Jr.

Attachment

# Retirement Claim Denials Because of Lack of Insured Status

## A-09-14-34107



January 2016

Office of Audit Report Summary

### Objective

To determine whether the Social Security Administration (SSA) properly denied retirement applications for lack of insured status.

### Background

Insured status is the earnings requirement an individual must meet to establish entitlement to retirement benefits. The claimant must be fully insured, have attained age 62, and have applied for benefits.

Before denying a retirement claim for lack of insured status, SSA employees must complete all development for lag earnings and resolve all earnings discrepancies and coverage issues.

SSA employees should not deny a claim for lack of insured status if the individual will be insured within 4 months of the month of adjudication and evidence of earnings for the qualifying quarter is available.

Under the "deemed filing" provision, individuals who file an application for reduced retirement or spousal benefits must also file for the other benefit if they are eligible for both benefits in their first month of entitlement.

From January 2004 to April 2014, SSA denied 686,237 retirement claims for lack of insured status. From this, we identified 5,257 individuals who may have been insured because they had 40 or more quarters of coverage in the year they applied for benefits.

### Findings

SSA needs to improve its controls to ensure it does not deny retirement benefits to individuals who are fully insured. Based on our random sample, we estimate that SSA denied retirement benefits to 3,575 fully insured individuals from January 2004 to April 2014. Of these, 3,154 individuals were entitled to \$20.8 million in retirement benefits.

Generally, this occurred because (1) SSA employees did not review earnings or develop for lag earnings, and (2) claimants did not report, or provide proof of, earnings to SSA. We also found that SSA employees should have determined whether individuals whom it subsequently awarded retirement benefits should have had an earlier month of entitlement based on a prior application it had denied for lack of insured status.

### Recommendations

We recommend that SSA:

1. Take corrective action to award retirement benefits, as appropriate, to the 68 individuals identified by our audit.
2. Evaluate the results of its corrective action for the 68 individuals and determine whether it should review the remaining population of 5,157 individuals.
3. Remind employees to (1) develop for lag earnings if a claimant's eligibility to retirement benefits is dependent on those earnings and (2) review the prior retirement applications for individuals who file a new claim and may be entitled to additional benefits based on an earlier filing date.

SSA agreed with our recommendations.

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## **ABBREVIATIONS**

OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
U.S.C.	United States Code

## OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) properly denied retirement applications for lack of insured status.

## BACKGROUND

SSA administers the Old-Age, Survivors and Disability Insurance (OASDI) program under Title II of the *Social Security Act*. The OASDI program provides monthly benefits to retired and disabled workers, including their dependents and survivors.<sup>1</sup> Insured status is the earnings requirement an individual must meet to establish entitlement to retirement benefits. To meet insured status, an individual must have the required number of earnings credits, called quarters of coverage.<sup>2</sup> Generally, a fully insured individual has 40 quarters of coverage.<sup>3</sup> To be entitled to retirement benefits, a claimant must be fully insured, have attained age 62, and have applied for benefits.<sup>4</sup>

SSA employees must consider lag earnings before they deny a retirement claim for lack of insured status.<sup>5</sup> Lag earnings are recent earnings not yet recorded on an individual's earnings record. Specifically, SSA employees must complete all development for lag earnings and resolve all earnings discrepancies and coverage issues. In addition, SSA employees should not deny a claim for lack of insured status if the individual will be insured within 4 months of the month of adjudication and evidence of earnings for the qualifying quarter is available.<sup>6</sup>

The *Social Security Act* states that a claimant who applies for reduced retirement or spousal benefits must also file for the other benefit if eligible for both benefits in the first month of entitlement. This requirement is referred to as the "deemed filing" provision. When SSA becomes aware of the claimant's eligibility for the other benefit, it must retroactively apply the deemed filing provision.<sup>7</sup>

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<sup>1</sup> The *Social Security Act*, § 201 *et seq.*, 42 U.S.C. § 401 *et seq.* The *Social Security Act*, §202 *et seq.*, 42 U.S.C. § 402 *et seq.*

<sup>2</sup> 42 U.S.C. § 414 (a). *See also* SSA, POMS, RS 00301.101.A.1 (August 9, 2011).

<sup>3</sup> 42 U.S.C. § 414 (a). *See also* SSA, POMS, TC 11001.010.D (June 30, 2014).

<sup>4</sup> The *Social Security Act*, §202 (a), 42 U.S.C. § 402 (a).

<sup>5</sup> SSA, POMS, GN 01010.440 (December 12, 2014) and RS 01404.005.B (March 23, 2011).

<sup>6</sup> SSA, POMS, GN 01010.440 (December 12, 2014) and RS 01404.005 (March 23, 2011).

<sup>7</sup> The *Social Security Act*, §202 (r), 42 U.S.C. § 402 (r). *See also* SSA, POMS, GN 00204.004.A (February 13, 2012) and GN 00204.020.F (May 11, 2015).

From January 2004 to April 2014, SSA denied 686,237 retirement claims for lack of insured status. From this, we identified 5,257 individuals who may have been insured because they had 40 or more quarters of coverage in the year they applied for benefits. From this population, we selected a random sample of 100 individuals for review (see Appendix B).

## RESULTS OF REVIEW

SSA needs to improve its controls to ensure it does not deny retirement benefits to individuals who are fully insured. Based on our random sample, we estimate that SSA denied retirement benefits to 3,575 fully insured individuals from January 2004 to April 2014. Of these, 3,154 individuals were entitled to \$20.8 million in retirement benefits (see Appendix B).

Generally, this occurred because (1) SSA employees did not review earnings or develop for lag earnings, and (2) claimants did not report or provide proof of earnings to SSA. We also found that SSA employees should have determined whether individuals whom it subsequently awarded retirement benefits should have had an earlier month of entitlement based on a prior application that it had denied for lack of insured status.

### Retirement Benefits Denied to Fully Insured Individuals

Of the 100 individuals in our sample, 68 were fully insured and entitled to retirement benefits. However, SSA denied their retirement claims because of lack of insured status.<sup>8</sup> Specifically, we found:

- 24 individuals<sup>9</sup> who were entitled to \$72,924 in retirement benefits were improperly denied benefits because SSA did not review their earnings or develop for lag earnings. Of these, 13 were subject to the deemed filing provision, and 11 were not.
- 37 individuals<sup>10</sup> who were entitled to \$288,961 in retirement benefits were denied benefits because they did not inform SSA of lag earnings or provide proof of their earnings. Of these, 24 were subject to the deemed filing provision, and 13 were not.
- 7 individuals who were subsequently awarded retirement benefits were entitled to \$34,341 in additional retirement benefits based on a prior application that SSA had denied for lack of insured status.

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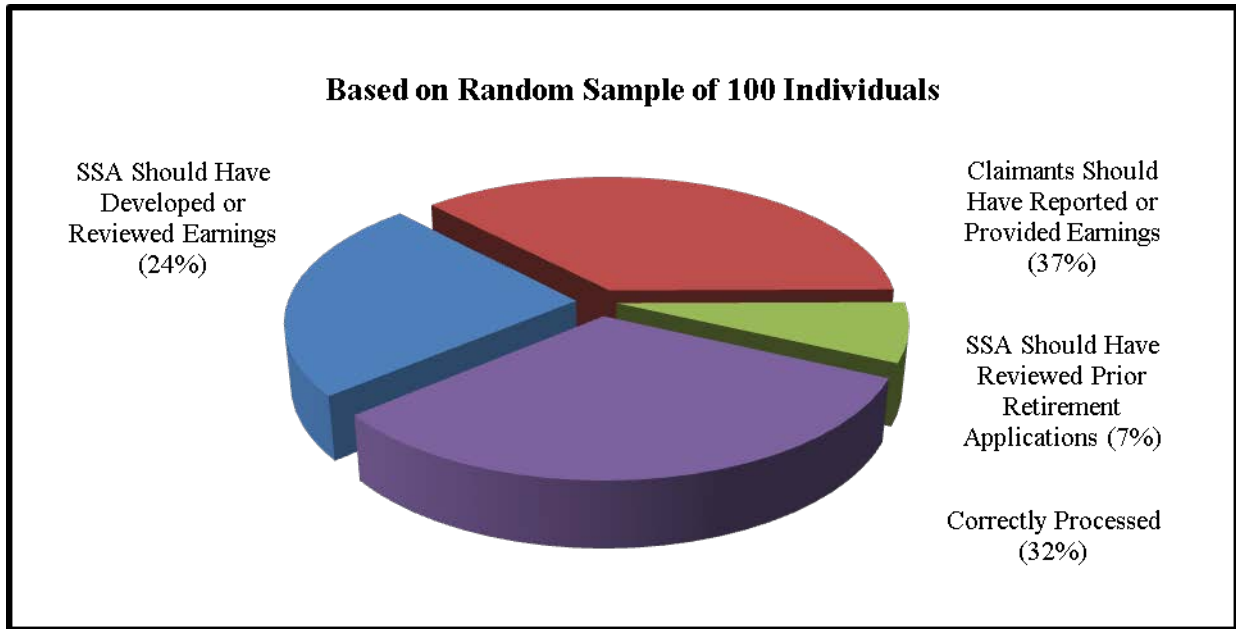
<sup>8</sup> Of the 68 individuals, 9 were deceased as of August 2015 and 8 were receiving Supplemental Security Income payments.

<sup>9</sup> This includes five individuals who should have been awarded retirement benefits; however, no benefits were payable because they were entitled to higher spousal or widow benefits.

<sup>10</sup> This includes three individuals who should have been awarded retirement benefits; however, no benefits were payable because they were entitled to higher spousal or widow benefits.

For the 68 individuals, 61 did not reapply for benefits.<sup>11</sup> Of these, 30 did not work after their year of filing, and 31 worked 1 or more years after their year of filing. As of August 2015, 51 of the 61 were full retirement age or older and therefore were entitled to benefits regardless of their earnings. In addition, 37 of the 61 were over age 70 and therefore had earned their maximum delayed retirement credits.<sup>12</sup> For the remaining 32 individuals, SSA correctly denied the retirement claims for 24 and awarded benefits to 8 who subsequently applied for benefits. Figure 1 summarizes the results of our review.

**Figure 1: Retirement Claim Denials Because of Lack of Insured Status**



### *SSA Should Have Developed or Reviewed Earnings*

When a claimant applies for retirement benefits, SSA is required to review the earnings record with the claimant to ensure it is accurate and complete.<sup>13</sup> If the claimant is fully insured, SSA should award retirement benefits. If the claimant is not fully insured, SSA must develop and request evidence of lag earnings if those earnings are necessary to obtain insured status. SSA must complete and document development for lag earnings before it denies a retirement claim

<sup>11</sup> The 61 individuals applied for benefits between 1.8 and 11.6 years ago.

<sup>12</sup> Retirement benefits may be increased for any month in which an individual did not receive a monthly benefit after full retirement age. The amount of the increase, referred to as a delayed retirement credit, depends on the number of months an individual was at full retirement age or older and eligible for, but not receiving, retirement benefits up to age 70. The *Social Security Act*, §202 (w), 42 U.S.C. § 402 (w). See also SSA, POMS, RS 00615.690.A (November 14, 2014).

<sup>13</sup> SSA, POMS, GN 01010.011 (January 26, 2015).



for lack of insured status.<sup>14</sup> In addition, SSA employees should not deny a claim for lack of insured status if the individual will be insured within 4 months of the month of adjudication and evidence of earnings for the qualifying quarter is available.<sup>15</sup>

The *Social Security Act* states that a claimant who applies for reduced retirement or spousal benefits must also file for the other benefit if they are eligible for both benefits in the first month of entitlement. This applies regardless of whether it was apparent the individual was eligible for both benefits when they filed. When SSA becomes aware of the claimant's eligibility for the other benefit, it must apply the deemed filing provision retroactively.<sup>16</sup>

We found that SSA improperly denied benefits to 24 individuals:<sup>17</sup> 20 where SSA did not develop for lag earnings, 2 where SSA did not review proof of earnings, and 2 where SSA did not review earnings records. Of these 24, 13 were subject to the deemed filing provision, and 11 were not. Although the claimants were insured and entitled to retirement benefits, SSA denied their claims because of lack of insured status. As a result, these individuals were entitled to \$72,924 in retirement benefits that SSA had not paid at the time of our audit.

For the 13 individuals who were subject to the deemed filing provision, SSA should have awarded reduced retirement benefits in the first month they were eligible for both retirement and spousal benefits. For the 11 individuals who were not subject to the deemed filing provision, SSA should have awarded retirement benefits in the first month they were fully insured or later, if selected by the claimant.

SSA subsequently recorded the wage reports for 22 of the 24 individuals.<sup>18</sup> SSA recorded these wages between 1 and 14 months after the individuals filed their applications. The remaining two individuals' earnings were recorded at least 8 months before they filed their applications.<sup>19</sup> The wage reports showed these individuals were fully insured when they applied for retirement benefits or within 4 months thereafter. Although SSA did not develop lag earnings or review their earnings record, it received evidence these individuals were fully insured and should have been awarded benefits.

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<sup>14</sup> SSA, POMS, RS 01404.005.B (March 23, 2011).

<sup>15</sup> SSA, POMS, GN 01010.440 (December 12, 2014) and RS 01404.005 (March 23, 2011).

<sup>16</sup> The *Social Security Act*, §202 (r), 42 U.S.C. § 402 (r). See also SSA, POMS, GN 00204.004.A (February 13, 2012) and GN 00204.020.F (May 11, 2015).

<sup>17</sup> This includes five individuals who should have been awarded retirement benefits; however, no benefits were payable because they were entitled to higher spousal or widow benefits.

<sup>18</sup> Generally, SSA receives annual wage reports on or before February in the year following the wages were earned. SSA, POMS, RM 01101.003.B (February 27, 2012).

<sup>19</sup> The mean was 8 months. The median was 7.5 months.

For example, an individual applied for retirement benefits in January 2010. The individual had sufficient earnings to be insured for retirement benefits in January 2009. However, SSA did not develop for evidence of the individual's 2009 earnings as required. SSA subsequently obtained evidence the individual was fully insured when it received the claimant's wage report in September 2010. Nevertheless, SSA did not take action to award \$11,794 in retirement benefits from January 2010 to August 2015.

### *Claimants Should Have Reported or Provided Earnings*

According to the *Social Security Act*, an individual is entitled to retirement benefits if he/she is fully insured, has attained age 62, and applied for benefits.<sup>20</sup> To meet fully insured status, an individual must have the required number of quarters of coverage.<sup>21</sup> A claimant who does not have sufficient quarters of coverage should inform SSA of any lag earnings and provide proof of earnings if insured status depends on the lag earnings. Before denying a retirement claim for lack of insured status, SSA must complete and document development for lag earnings and resolve any earnings discrepancies.<sup>22</sup>

We found that 37 claimants<sup>23</sup> did not inform SSA of their lag earnings or provide requested proof of earnings. Of these, 24 were subject to the deemed filing provision, and 13 were not. SSA denied the retirement claims because the claimants did not report lag earnings or provide proof of earnings. However, since these individuals were fully insured, they were entitled to \$288,961 in retirement benefits.

For the 24 individuals who were subject to the deemed filing provision, SSA should have awarded reduced retirement benefits in the first month they were eligible for both retirement and spousal benefits. For the 13 individuals who were not subject to the deemed filing provision, the claimants were entitled to retirement benefits when they applied for benefits had they reported their lag earnings or provided proof of earnings to SSA.

SSA subsequently recorded the wage reports for all 37 individuals. SSA recorded these wages between 1 and 24 months after the individuals filed their applications.<sup>24</sup> Generally, the wage reports showed these individuals were fully insured when they applied for retirement benefits or within 4 months thereafter. Although the claimants did not inform SSA of their earnings when they filed their applications, SSA subsequently received evidence they were fully insured and should have been awarded benefits.

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<sup>20</sup> The *Social Security Act*, §202 (a), 42 U.S.C. § 402 (a).

<sup>21</sup> 42 U.S.C. § 414 (a). See also SSA, POMS, RS 00301.101.A.1 (August 9, 2011).

<sup>22</sup> SSA, POMS, GN 01010.440 (December 12, 2014) and RS 01404.005 (March 23, 2011).

<sup>23</sup> This includes three individuals who should have been awarded retirement benefits; however, no benefits were payable because they were entitled to higher spousal or widow benefits.

<sup>24</sup> The mean was 9 months. The median was 7.5 months.

For example, a claimant applied for retirement benefits in February 2006. The claimant had sufficient earnings to be insured for retirement benefits in April 2005. However, SSA denied the claimant's benefits for lack of insured status because her 2005 earnings were not on SSA's records, and the claimant did not inform SSA of lag earnings. SSA subsequently obtained evidence the claimant was fully insured when it received the claimant's wage report in June 2006. As a result, the claimant was entitled to \$46,269 in retirement benefits from February 2006 to August 2015.

### *SSA Should Have Reviewed Prior Retirement Applications*

According to SSA policy, if an individual files a new or subsequent claim for retirement benefits, SSA employees should review the prior application when it affects a claimant's insured status. A prior denied claim for lack of insured status may be reopened if the claimant was fully insured based on an earlier application filing date.<sup>25</sup>

We found that SSA should have reviewed the prior retirement applications of seven individuals to determine their proper month of entitlement. These individuals were fully insured and entitled to benefits based on their prior application dates. However, SSA denied their initial claims because it did not develop for lag earnings or the claimants had not reported, or provided proof of, their earnings to SSA. These individuals subsequently filed a new claim for benefits. However, SSA did not review the prior application to determine whether the claimants were fully insured and eligible for benefits based on the earlier filing date. As a result, these individuals were entitled to \$34,341 in additional retirement benefits.

For example, an individual applied for retirement benefits in December 2011 and requested payment beginning at full retirement age in January 2012. The individual had sufficient earnings to be insured for retirement benefits in October 2011. However, SSA denied the claim for lack of insured status because his earnings were not recorded on SSA's records until May 2012. The beneficiary filed a new claim in July 2014, and SSA awarded benefits as of January 2014. Nevertheless, SSA did not determine whether the individual's prior application should have allowed him to be entitled to benefits beginning at full retirement age. Based on the earlier filing date, the beneficiary was entitled to an additional \$21,225 in retirement benefits from January 2012 to August 2015.

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<sup>25</sup> SSA, POMS, GN 04030.070.B (May 28, 2015) and GN 04001.010 (December 22, 1989).

## CONCLUSIONS

SSA needs to improve its controls to ensure it does not deny retirement benefits to individuals who are fully insured. Based on our random sample, we estimate that SSA denied retirement benefits to 3,575 fully insured individuals from January 2004 to April 2014. Of these, 3,154 individuals were entitled to \$20.8 million in retirement benefits (see Appendix B).

Generally, this occurred because (1) SSA employees did not review earnings or develop for lag earnings, and (2) claimants did not report or provide proof of earnings to SSA. We also found that SSA employees should have determined whether individuals whom it subsequently awarded retirement benefits should have had an earlier month of entitlement based on a prior application that it had denied for lack of insured status.

We found that 61 of the 68 individuals did not reapply for benefits. Of these, 30 did not work after their year of filing, and 31 worked 1 or more years after their year of filing. As of August 2015, 51 of the 61 were full retirement age or older and therefore were entitled to benefits regardless of their earnings. In addition, 37 of the 61 were over age 70 and therefore earned their maximum delayed retirement credits.

## RECOMMENDATIONS

We recommend that SSA:

1. Take corrective action to award retirement benefits, as appropriate, to the 68 individuals identified by our audit.
2. Evaluate the results of its corrective action for the 68 individuals and determine whether it should review the remaining population of 5,157 individuals.
3. Remind employees to (1) develop for lag earnings if a claimant's eligibility to retirement benefits is dependent on those earnings and (2) review the prior retirement applications for individuals who file a new claim and may be entitled to additional benefits based on an earlier filing date.

## AGENCY COMMENTS

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



Steven L. Schaeffer, JD, CPA, CGFM, CGMA  
Assistant Inspector General for Audit

# *APPENDICES*

## Appendix A – SCOPE AND METHODOLOGY

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We obtained from the Social Security Administration’s (SSA) Master Beneficiary Record and Master Earnings File a data extract of 5,257 individuals who had a date of filing from January 2004 to April 2014, were denied retirement benefits for lack of insured status, and had 40 quarters of coverage or more in the year of filing. From this population, we selected a random sample of 100 individuals for review.

To accomplish our objective, we

- reviewed the applicable sections of the *Social Security Act*, United States Code, and SSA’s Program Operations Manual System;
- interviewed SSA employees from the Office of Retirement and Disability Policy;
- reviewed queries from SSA’s Master Beneficiary and Supplemental Security Records, Informational/Certified Earnings Records, Interactive Computation Facility, Online Retrieval System, Modernized Claims System, Numident, and Detailed Earnings Query; and
- determined the amount of retirement benefits entitled to individuals who were fully insured but denied retirement benefits for lack of insured status.

We determined whether the computer-processed data from the Master Beneficiary Record were sufficiently reliable for our intended purpose. We tested the data to determine their completeness and accuracy. These tests allowed us to assess the reliability of the data and achieve our audit objective.

We conducted audit work in Richmond, California, and Baltimore, Maryland, between March and August 2015. The entity audited was the Office of Operations under the Office of the Deputy Commissioner for 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 our 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

From the Social Security Administration’s (SSA) Master Beneficiary Record and Master Earnings File, we obtained a data extract of 5,257 individuals who had a date of filing from January 2004 to April 2014, were denied retirement benefits for lack of insured status, and had 40 quarters of coverage or more in the year of filing. From this population, we selected a random sample of 100 individuals for review. Specifically, we reviewed the individuals’ earnings and monthly benefit amounts to determine whether retirement benefits were payable.

Of the 100 individuals in our sample, 68 were fully insured and entitled to retirement benefits. However, SSA denied their retirement claims because of lack of insured status. Of these, 60 were entitled to \$396,226 in retirement benefits, and 8 did not have benefits payable because they were entitled to higher spousal or widow benefits. Projecting our sample results to the population of 5,257 individuals, we estimate that SSA denied retirement benefits to 3,575 fully insured individuals. Of these, approximately 3,154 individuals were entitled to \$20.8 million in retirement benefits.

The following tables provide the details of our sample results and statistical projections.

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

Description	Individuals
Population Size	5,257
Sample Size	100

**Table B–2: Fully Insured Individuals**

Description	Individuals
Sample Results	68
Point Estimate	3,575
Projection – Lower Limit	3,132
Projection – Upper Limit	3,975

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

**Table B–3: Fully Insured Individuals and Amount of Retirement Benefits**

Description	Individuals	Retirement Benefits
Sample Results	60	\$396,226
Point Estimate	3,154	\$20,829,617
Projection – Lower Limit	2,701	\$11,500,592
Projection – Upper Limit	3,583	\$30,158,642

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

## Appendix C – AGENCY COMMENTS

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## SOCIAL SECURITY

### MEMORANDUM

**Date:** January 12, 2016 **Refer To:** S1J-3

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

**From:** Frank Cristaudo /s/  
Executive Counselor to the Commissioner

**Subject:** Office of the Inspector General Draft Report, "Retirement Claim Denials Due to Lack of Insured Status" (A-09-14-34107)--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 Gary S. Hatcher at (410) 965-0680.

Attachment



**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,  
“RETIREMENT CLAIM DENIALS DUE TO LACK OF INSURED STATUS”  
(A-09-14-34107)**

Thank you for the opportunity to comment on the draft report. We strive to process all claims accurately in accordance with policy. We would like to put into context the extent of the potential errors compared to the number of claims processed during the 10-year review period. From fiscal year (FY) 2004 to FY 2014, we completed approximately 48.3 million retirement claims.

It is important to acknowledge that persons making a decision to apply, and reapply, for benefits make a wide range of personal decisions. Examples of the variables that applicants consider include: changes in employment status, family structure, and health, or the receipt of a pension or other benefits.

Below are our responses to the recommendations.

**Recommendation 1**

Take corrective action to award retirement benefits, as appropriate, to the 68 individuals identified by our audit.

**Response**

We agree with reviewing and, if needed, taking policy-compliant corrective action on these cases by April 29, 2016. Based on our initial review of the cases in the OIG sample we correctly denied 37 cases due to the individual not informing us of lag earnings or not providing proof of their earnings. In addition, 13 of these 37 cases were not subject to deemed filing.

**Recommendation 2**

Evaluate the results of its corrective action for the 68 individuals and determine whether it should review the remaining population of 5,157 individuals.

**Response**

We agree. We found 13 of the individuals identified in the audit were handled correctly and were not subject to deemed filing and we will review the remaining cases from the sample population to determine whether we should review the remaining population of 5,157 individuals.

**Recommendation 3**

Remind employees to: (1) develop for lag earnings if a claimant's eligibility to retirement benefits is dependent on those earnings; and (2) review the prior retirement applications for

individuals who file a new claim and may be entitled to additional benefits based on an earlier filing date.

### **Response**

We agree. By March 2016, we will remind staff to: (1) develop for lag earnings if a claimant's eligibility to retirement benefits is dependent on those earnings; and (2) when necessary, review the prior retirement applications for individuals who file a new claim but who may have been insured during the life of an earlier application. We would like to note that in November 2014 we released an Administrative Message that addressed lag earnings (<http://policynet.ba.ssa.gov/referencearchive.nsf/links/11102014022053PM>).

[In addition to the information listed above, SSA also provided a technical comment, which has been addressed, where appropriate, in this report.]

## Appendix D – ACKNOWLEDGMENTS

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James J. Klein, Director, San Francisco Audit Division

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