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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**CONCURRENT TITLE II AND  
TITLE XVI  
BENEFICIARIES RECEIVING  
REPRESENTATIVE  
PAYEE AND DIRECT PAYMENTS**

**April 2006**

**A-09-05-15144**

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**AUDIT REPORT**

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# SOCIAL SECURITY

## MEMORANDUM

Date: April 12, 2006

Refer To:

To: The Commissioner

From: Inspector General

Subject: Concurrent Title II and Title XVI Beneficiaries Receiving Representative Payee and Direct Payments (A-09-05-15144)

## OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) had adequate controls to prevent the direct payment of concurrent benefits to individuals who had been appointed a representative payee.

## BACKGROUND

SSA pays benefits under Titles II and XVI of the *Social Security Act*.<sup>1</sup> Under Title II, the Old-Age, Survivors and Disability Insurance program provides benefits to retired and disabled workers, including their dependents and survivors. Under Title XVI, the Supplemental Security Income program provides payments to financially needy individuals who are aged, blind, or disabled.

Some individuals cannot manage or direct the management of their finances because of their youth or mental and/or physical impairments. Congress granted SSA the authority to appoint representative payees to receive and manage these beneficiaries' payments.<sup>2</sup> A representative payee may be an individual or an organization. SSA selects representative payees for Title II and XVI beneficiaries when representative payments would serve the individual's interests. Representative payees are responsible for using benefits in the beneficiary's best interests.<sup>3</sup>

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<sup>1</sup> 42 USC §§ 402 *et seq.* and 1381 *et seq.*

<sup>2</sup> We use the term "beneficiary" generically in this report to refer to both Old-Age, Survivors and Disability Insurance beneficiaries and Supplemental Security Income recipients.

<sup>3</sup> See 42 USC §§ 405(j) and 1383(a); 20 CFR Chapt. 3 Part 404 Subpart U, and Part 416 Subpart F.

Individuals who apply for Title XVI payments must apply for other program benefits, including Title II benefits. Claimants must apply on their own Social Security number (SSN) for Title II benefits as well as for dependent benefits, divorced spouse's benefits, and survivor's benefits.<sup>4</sup> Beneficiaries who require a representative payee should be appointed one representative payee for all benefits to which he/she is entitled.<sup>5</sup>

There are approximately 750,000 individuals with representative payees who are concurrently eligible for both Title II and Title XVI benefits.

## **RESULTS OF REVIEW**

SSA needs to improve its controls to prevent the direct payment of concurrent benefits to individuals who have been appointed a representative payee. Our review disclosed that SSA field office staff did not always ascertain whether an individual was concurrently entitled after determining they needed a representative payee. Furthermore, we found the interface between SSA's payment records had limitations that prevented the detection of the conflicting payment methods.

As of April 2005, there were 11,399 concurrently entitled Title II and Title XVI beneficiaries receiving both representative payee and direct payments. Projecting the results of our review of 250 sample cases, we estimate the 11,399 beneficiaries received \$166 million in direct payments while the representative payees received \$175 million on behalf of the beneficiaries. This includes an estimated \$49.7 million in benefit payments that SSA sent to different addresses or bank accounts for approximately 1,100 beneficiaries. Further, if SSA does not determine whether the 11,399 concurrent beneficiaries should be paid directly or through a representative payee, we estimate that \$81.8 million in additional benefit payments will be paid over the next 12 months (see Appendix C).

### **Concurrent Payments Sent to Beneficiaries and Representative Payees**

SSA policy<sup>6</sup> states that adult beneficiaries are presumed capable of managing or directing someone else to manage their benefits unless there is evidence to the contrary. If doubts arise regarding a beneficiary's ability to manage or direct the management of their funds, SSA will determine their capability. In addition, legally incompetent beneficiaries should be appointed a representative payee, as should

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<sup>4</sup> SSA, POMS, SI 00510.005.B.1.

<sup>5</sup> SSA, POMS, GN 00502.183.B.4.

<sup>6</sup> SSA, POMS, GN 00502.010.

children under age 18.<sup>7</sup> When concurrently entitled beneficiaries are determined incapable, one representative payee should be appointed to receive both benefits.<sup>8</sup>

To ensure SSA makes consistent representative payee determinations, there is an interface between the Master Beneficiary (MBR) and Supplemental Security Records (SSR) to identify discrepancies. The interface generates an alert if a newly entitled Title II beneficiary requires a representative payee and he/she has been receiving Title XVI payments directly. The interface also generates an alert when benefits to a Title II beneficiary are suspended because he/she requires a representative payee, but the beneficiary's Title XVI payments were not suspended.

All of the 250 concurrently entitled beneficiaries in our sample were receiving 1 benefit through a representative payee while the other payment was being made directly to the beneficiary.<sup>9</sup> The total amount paid to, and on behalf of, our sample beneficiaries was \$7,500,395. These payments were made over an average of 54 months. Projecting our results to the population of 11,399 beneficiaries, we estimate SSA paid these beneficiaries \$341,988,077. The following chart includes the payments made to the beneficiaries and their representative payees.

<b>Benefit Payments</b>	<b>Paid to Representative Payee</b>	<b>Paid to Beneficiary</b>	<b>Total Paid</b>
Amount Paid	\$3,858,794	\$3,641,601	\$7,500,395
Estimate for Population	\$175,945,613	\$166,042,464	\$341,988,077

We found that conflicting payee methods were established when a beneficiary already receiving benefits from one program became entitled to benefits on the other program. For example, a surviving child beneficiary entitled to Title II benefits since November 1990 became entitled to Title XVI disability benefits in August 1994. At that time, SSA appointed a representative payee to receive the Title XVI benefits on the beneficiary's behalf. However, the beneficiary continued to receive the Title II benefits directly. Consequently, the beneficiary received direct payments of \$6,556 while the representative payee received \$28,380 in the same period.

We also found that SSA failed to appoint representative payees for beneficiaries who had been previously determined to be incapable of managing their own funds. For example, a disabled beneficiary entitled to Title XVI since July 1974 was appointed a

<sup>7</sup> SSA, POMS, GN 00502.005.A and GN 00502.070.A.

<sup>8</sup> SSA, POMS, GN 00502.183.B.4.

<sup>9</sup> Although there were conflicting payment methods for all 250 cases, no payments were made to 6 beneficiaries and 5 representative payees in our audit period, which ended on April 1, 2005.

representative payee in September 1990. However, SSA did not appoint a representative payee for the beneficiary's Title II disability benefits when he became entitled in July 1992. As of April 1, 2005, the beneficiary had received \$89,813 in direct payments while the representative payee received \$13,539 in payments.

### **Payments Sent to Different Addresses or Different Bank Accounts**

SSA sent benefit payments for 25 of the 250 concurrently entitled beneficiaries in our sample to different addresses or deposited payments into different bank accounts.<sup>10</sup> The total amount of payments made to, and on behalf of, these beneficiaries totaled almost \$1.1 million. These payments were made over an average of 78 months. We believe payments sent to different locations coupled with conflicting payee methods may create an increased risk of fraud. Projecting our sample results to the population of 11,399 beneficiaries, we estimate SSA mailed to different addresses or deposited into different bank accounts benefit payments totaling \$49.7 million.

<b>Amounts Paid to Different Addresses or Bank Accounts</b>	
Total Amount Paid	\$1,090,079
Estimate for Population	\$49,703,277

For example, in one case, SSA mailed the payments to two different cities that were approximately 26 miles apart. The Title XVI payments were mailed to the beneficiary in Canton, Mississippi, while the Title II benefits were mailed to the representative payee in Jackson, Mississippi. Our review showed that, from August 1985 to April 2005, the representative payee received \$66,228 and the beneficiary received \$46,890.

In another case, the payments were mailed to two different post office boxes. In this case, SSA appointed a representative payee to a child who was receiving Title II disability benefits in November 1987. The beneficiary became concurrently entitled to Title XVI in January 1990. However, SSA did not appoint a representative payee to receive the Title XVI payments. As of April 2005, the beneficiary had received direct payments of \$88,964 while the representative payee had received \$15,927.

### **Over 30 Percent Had Conflicting Payment Methods for Longer Than 5 Years**

Our analysis disclosed that 32 percent of the sample cases had conflicting payment records for longer than 5 years. The following chart illustrates the number of cases paid over several incremental time intervals and the percentage of cases paid during the time intervals.

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<sup>10</sup> Although there were different addresses or bank accounts for all 25 cases, in 1 case, no payments were made within our audit period, which ended on April 1, 2005.

Number of Cases by Time Interval		
Years	Cases	Percent
< 1 year	70	28
1 to 2 years	38	15.2
> 2 years to 5 years	62	24.8
> 5 years	80	32
Total	250	100

The longest period that SSA paid concurrent benefits to a representative payee and beneficiary was over 31 years. In that case, SSA appointed a representative payee in February 1969 to receive the beneficiary's Title II benefits. In January 1974, the beneficiary became eligible for Title XVI payments. However, SSA did not appoint a representative payee to receive the Title XVI payments. Consequently, from January 1974 to April 2005, the representative payee received \$91,870 and the beneficiary received \$52,665 in direct payments.

### **SSA Did Not Always Know When Beneficiaries Were Concurrently Entitled**

We found there were several reasons why the conflicting payee methods were established and not detected. We found that, generally, SSA field office staff made oversight errors during the representative payee process. Specifically, they did not verify that beneficiaries were concurrently entitled when making representative payee determinations.

Although field office oversight usually caused the conflicting payment methods, limitations in the MBR/SSR interface prevented their detection. Generally, the interface alert is only generated when Title II benefits are suspended because a beneficiary needs a representative payee and the SSR does not show a representative payee present.

### **Impact of Concurrent Benefits Paid to Representative Payees and Beneficiaries**

SSA is responsible for determining whether beneficiaries are capable of managing their own funds or directing someone else to manage their funds. Payments made to representative payees for beneficiaries who are capable deprive the individuals of fiscal independence and determining how their benefits are spent. Conversely, if SSA pays incapable beneficiaries directly, their basic needs (food, clothing and shelter) may not be met.

Furthermore, when SSA is unaware of the conflicting payee methods, not all benefit payments, conserved funds, and other financial resources may be included in the

annual *Representative Payee Report*. Representative payees are required to provide SSA this Report to account for how they spent and conserved benefits.<sup>11</sup> SSA requires a single *Representative Payee Report* to account for all benefits paid to concurrently entitled beneficiaries. SSA uses the Report to determine whether beneficiaries exceeded the resource limit<sup>12</sup> under Title XVI.

## CONCLUSION AND RECOMMENDATIONS

We found that SSA needs to improve its controls to prevent concurrent Title II and XVI beneficiaries from receiving representative payee and direct payments. We identified 11,399 concurrently entitled beneficiaries who received an estimated \$166 million in direct payments while representative payees received \$175 million on behalf of these beneficiaries. This included an estimated \$49.7 million in benefit payments that SSA sent to different addresses or bank accounts for approximately 1,100 beneficiaries. If SSA does not determine whether the 11,399 concurrent beneficiaries should be paid directly or through a representative payee, we estimate that additional benefit payments totaling \$81.8 million will be paid over the next 12 months (see Appendix C). Finally, we provided SSA the 11,399 cases for it to take corrective actions.

We recommend that SSA:

1. Determine whether the 11,399 concurrent beneficiaries should have their benefits paid directly or through a representative payee.
2. Determine whether potential representative payee misuse exists for the approximately 1,100 cases where payments were sent to different addresses, P.O. Boxes, or bank accounts and, if so refer the cases to the Office of the Inspector General for possible criminal, civil and/or administrative remedies.
3. Develop a systems edit/alert to prevent and/or detect instances in which concurrent payments are made directly to a beneficiary and a representative payee.
4. Remind SSA technicians to verify whether beneficiaries are concurrently entitled when making representative payee determinations.

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<sup>11</sup> SSA, POMS, GN 00605.001, A and B.1.

<sup>12</sup> Generally, Title XVI beneficiaries cannot have over \$2,000 in resources; a married beneficiary is limited to \$3,000. If a beneficiary exceeds the resource limit, the individual is not eligible for SSI. SSA, POMS, SI 01110.003, A.



**AGENCY COMMENTS**

SSA agreed with our recommendations. See Appendix D for the full text of the Agency's comments.



Patrick P. O'Carroll, Jr.

# *Appendices*

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APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Sampling Methodology and Results

APPENDIX D – Agency Comments

APPENDIX E – OIG Contacts and Staff Acknowledgments

## Acronyms

CFR	Code of Federal Regulations
MBR	Master Beneficiary Record
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSN	Social Security Number
SSR	Supplemental Security Record

# Scope and Methodology

We obtained an extract from the Master Beneficiary (MBR) and Supplemental Security Records (SSR) of concurrently entitled beneficiaries receiving both representative payee and direct payments. We identified 11,399 concurrent beneficiaries who had conflicting payment methods as of April 1, 2005. From this population, we randomly selected a sample of 250 beneficiaries for review.

To accomplish our objective, we

- reviewed the applicable sections of the *Social Security Act (Act)*, U.S. Code, and the Social Security Administration's (SSA) Program Operations Manual System;
- interviewed SSA employees from the San Francisco Regional Office, Western Program Service Center and Office of Income Security Programs;
- extracted a random sample of 250 concurrent beneficiaries and obtained queries from SSA's MBR, SSR, and Retirement Survivors and Disability Insurance Payment History, as well as the Representative Payee System.

We determined whether the computer-processed data from the MBR and SSR systems were sufficiently reliable for our intended use. We conducted tests to determine the completeness and accuracy of the data. These tests allowed us to assess the reliability of the data and achieve our audit objectives.

We evaluated the adequacy of SSA's controls to prevent the direct payment of concurrent benefits to individuals who have been appointed a representative payee. Specifically, we determined whether the interface between the MBR and SSR identified situations in which benefit payments SSA paid both directly and to representative payees for concurrently entitled beneficiaries. The amounts reported represent the total benefit payments made to and on behalf of the concurrent beneficiaries through the date that we obtained our data extract (April 1, 2005).

We performed audit work in Richmond, California, between April and December 2005. The entity audited was SSA's Office of Income Security Programs under the Deputy Commissioner for Disability and Income Security Programs. We conducted our audit in accordance with generally accepted government auditing standards.

## Sampling Methodology and Results

On April 1, 2005, we obtained a data extract from the Social Security Administration's (SSA) Master Beneficiary (MBR) and Supplemental Security Records (SSR) of concurrent beneficiaries with conflicting payment methods. The concurrent beneficiaries were all in current pay status receiving both representative payee and direct payments.

We randomly selected 250 concurrently entitled beneficiaries for review. For each sample item, we verified that the conflicting payment methods existed and computed the amounts paid to, and on behalf of, the beneficiaries during this period. We also computed benefit payments mailed to different addresses or deposited into different bank accounts for the sample beneficiaries.

Of the 250 concurrently entitled beneficiaries in our sample, we found that each beneficiary was receiving one benefit through a representative payee while the other was being paid directly to the beneficiary. However, some of these beneficiaries did not receive payments within our audit period, which ended April 1, 2005. Therefore, our statistical projections are based on the approximate \$3.6 million paid directly to 244 of the sample beneficiaries and the approximate \$3.8 million paid to 245 of our sample representative payees on their behalf. In addition, we found that benefit payments for 25 of our sample beneficiaries were mailed to different addresses or deposited to different bank accounts. However, in one case no payments were made within our audit period. Accordingly, our statistical projection is based on the approximately \$1.1 million in payments made to and on behalf of 24 of our sample beneficiaries.

Projecting these results to our population of 11,399 concurrently entitled beneficiaries, we estimate SSA paid \$166 million in direct payments while their representative payees received \$175 million. Further, if SSA does not resolve whether the 11,399 concurrent beneficiaries should be paid directly or through a representative payee, we estimate that additional benefit payments totaling \$81.8 million will be paid over the next 12 months. In addition, we estimate that SSA mailed to different addresses or deposited into different bank accounts benefit payments totaling \$49.7 million. The following tables provide the details of our sample results and statistical projections.

**Table 1 – Conflicting Payment Methods**

<b>Description</b>	<b>Direct Payments</b>	<b>Representative Payee</b>
Sample Results	\$3,641,601	\$3,858,794
Point Estimate	\$166,042,464	\$175,945,613
Lower Limit	\$142,532,306	\$152,796,910
Upper Limit	\$189,552,623	\$199,094,315

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

**Table 2 – Different Addresses or Bank Accounts**

<b>Description</b>	<b>Number of Cases</b>	<b>Benefit Payments</b>
Sample Results	24	\$1,090,079
Point Estimate	1,094	\$49,703,277
Lower Limit	768	\$27,790,483
Upper Limit	1,504	\$71,616,070

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

**Table 3 – 12-Month Estimate for Conflicting Payment Methods<sup>1</sup>**

<b>Description</b>	<b>Direct Payments</b>	<b>Representative Payee Payments</b>
Point Estimate	\$3,093,412	\$3,727,353
Lower Limit	\$2,864,497	\$3,507,579
Upper Limit	\$3,322,327	\$3,947,128
Annual Estimate (Population)	\$37,120,944	\$44,728,236

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

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<sup>1</sup> Our estimates were based on the monthly benefit amounts paid to our sample cases during March 2005.

## Agency Comments



## SOCIAL SECURITY

### MEMORANDUM

**Date:** March 30, 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, "Concurrent Title II and Title XVI Beneficiaries Receiving Representative Payee and Direct Payments" (A-09-05-15144) – INFORMATION

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

Please let me know if we can be of further assistance. Staff inquiries may be directed to Ms. Candace Skurnik, Director, Audit Management and Liaison Staff, on extension 54636.

Attachment:  
SSA Response



**COMMENTS ON THE OFFICE OF INSPECTOR GENERAL (OIG) DRAFT REPORT,  
“CONCURRENT TITLE II AND TITLE XVI BENEFICIARIES RECEIVING  
REPRESENTATIVE PAYEE AND DIRECT PAYMENTS”  
(A-09-05-15144)**

Thank you for the opportunity to review and comment on the draft report. We appreciate your conducting this audit of concurrent Title II and Title XVI beneficiaries receiving representative payee (Rep Payee) and direct payments.

Recommendation 1

SSA should determine whether the 11,399 concurrent beneficiaries should have their benefits paid directly or through a Rep Payee.

Comment

We agree. However, due to the age of OIG's data, we will perform a new match between the Master Beneficiary Record (MBR) and the Social Security Record (SSR) systems to identify cases currently having these conditions. We anticipate completing the match, establishing a control mechanism for this workload, and issuing processing instructions to field office (FO) personnel by June 2006.

Recommendation 2

SSA should determine whether potential Rep Payee misuse exists for the approximately 1,100 cases where payments were sent to different addresses, P.O. Boxes, or bank accounts and, if so, refer the cases to OIG for possible criminal, civil and/or administrative remedies.

Comment

We agree with the intent of this recommendation and as part of the instructions described in response to recommendation one, we will advise FO personnel to pay special attention to cases having different addresses. When appropriate, we will determine if a misuse investigation is warranted. We will remind FO personnel that any time misuse exists, the case must be referred to OIG for consideration of possible criminal, civil and/or administrative remedies.

Recommendation 3

SSA should develop a systems edit/alert to prevent and/or detect instances in which concurrent payments are made directly to a beneficiary and a Rep Payee.

### Comment

We agree. The Agency is currently developing a process within the Representative Payee System (RPS) that will prevent the selection of different payees for concurrent entitlements. Implementation is expected September 30, 2006. However, the report should clarify that the cases OIG identified were instances in which the FO personnel did not enter the payee information into RPS. The changes we are making in the RPS cannot identify these discrepancies; they would have to be identified via the type of match described in the response to the first recommendation. We are currently evaluating the value and feasibility of conducting periodic matches between the MBR and the SSR to find and resolve any future cases of this type.

### Recommendation 4

SSA should remind technicians to verify whether beneficiaries are concurrently entitled when making Rep Payee determinations.

### Comment

We agree. Implementing this recommendation would improve SSA's efficiency in detecting and preventing concurrent payments to Rep Payees and beneficiaries. We will issue a reminder in the processing instructions scheduled for release by June 2006.

## **OIG Contacts and Staff Acknowledgments**

### ***OIG Contacts***

James J. Klein, Director, San Francisco Audit Division, (510) 970-1739

Joe Robleto, Audit Manager, (510) 970-1737

### ***Acknowledgments***

In addition to those named above:

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Brennan Kraje, Statistician

Kimberly Beauchamp, Writer-Editor

For additional copies of this report, please visit our web site at [www.socialsecurity.gov/oig](http://www.socialsecurity.gov/oig) or contact the Office of the Inspector General's Public Affairs Specialist at (410) 965-3218. Refer to Common Identification Number A-09-05-15144.

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