



Highlights of [GAO-04-656](#), a report to the Chairman, Subcommittee on Social Security, Committee on Ways and Means, House of Representatives

SOCIAL SECURITY ADMINISTRATION

More Effort Needed to Assess Consistency of Disability Decisions

Why GAO Did This Study

Each year, about 2.5 million people file claims with the Social Security Administration (SSA) for disability benefits. If the claim is denied at the initial level, the claimant may appeal to the hearings level. The hearings level has allowed more than half of all appealed claims, an allowance rate that has raised concerns about the consistency of decisions made at the two levels. To help ensure consistency, SSA began a “process unification” initiative in 1994 and recently announced a new proposal to strengthen its disability programs. This report examines (1) the status of SSA’s process unification initiative, (2) SSA’s assessments of possible inconsistencies in decisions between adjudication levels, and (3) whether SSA’s new proposal incorporates changes to improve consistency in decisions between adjudication levels.

What GAO Recommends

To build an effective strategy to address possible inconsistencies in its decisions, we recommend that SSA quickly expand its assessment of inconsistency by implementing several specific enhancements. In its comments, SSA had some reservations concerning our findings, conclusions, and recommendations but agreed to pilot one recommendation and consider the others as it refines its new proposal. We continue to believe that SSA should implement our recommendations without delay to ensure the effectiveness of its new proposal.

www.gao.gov/cgi-bin/getrpt?GAO-04-656.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Robert Robertson, 202-512-7215, robertsonr@gao.gov.

What GAO Found

SSA has only partially implemented its process unification initiative. Although the agency initially made improvements in its policies and training intended to address inconsistency in decisions made at the two adjudication levels, it has not continued to actively pursue these efforts. Further, as part of this initiative, the agency implemented a review of hearings level decisions to identify ways to improve training and policies, but no new improvements were made as a result of the review. Finally, the agency began tests of two process changes intended to improve the consistency of decision making between the two adjudication levels. One test, which is ongoing, was not well designed and therefore will not provide conclusive results. The other test was abandoned because of implementation difficulties.

SSA’s assessments have not provided a clear understanding of the extent and causes of possible inconsistencies in decisions between adjudication levels. The two measures SSA uses to monitor inconsistency of decisions have weaknesses, such as not accounting for the many factors that can affect decision outcomes, and therefore do not provide a true picture of the changes in consistency. Furthermore, SSA has not sufficiently assessed the causes of possible inconsistency. For example, SSA conducted an analysis in 1994 that identified potential areas of inconsistency, but it did not employ more sophisticated techniques—such as multivariate analyses, followed by in-depth case studies—that would allow the agency to identify and address the key areas and leading causes of possible inconsistency. SSA has yet to repeat or expand upon this 10-year-old study.

SSA’s new proposal incorporates changes intended to improve consistency in decisions between levels. However, challenges may hinder its implementation. Most stakeholder groups for adjudicators and claimant representatives told us that a number of aspects of the proposal hold promise for improving consistency. These included one change, being tested as part of the process unification initiative, that requires state adjudicators to more fully develop and document their decisions, as well as several new changes, such as providing both adjudication levels with equal access to medical expertise. However, stakeholder groups also told us that insufficient resources and other obstacles might hinder the implementation of some changes. Adding to uncertainties about the proposal’s overall success is its dependence on a new electronic folder system that would allow cases to be easily accessed by various adjudicators across the country. However, this technically complex project has not been fully tested.