



## SOCIAL SECURITY

### MEMORANDUM

Date: June 18, 2002

Refer To:

To: Beatrice M. Disman  
Regional Commissioner

From: Inspector General

Subject: Financial-Related Audit of A. Holly Patterson Extended Care Facility – A Representative Payee for the Social Security Administration (A-02-02-12034)

Attached is a copy of our final report. Our objectives were to determine whether the A. Holly Patterson Extended Care Facility (1) had effective safeguards over the receipt and disbursement of Social Security benefits and (2) ensured Social Security benefits were used and accounted for in accordance with the Social Security Administration's policies and procedures.

Please comment within 60 days from the date of this memorandum on corrective action taken or planned on each recommendation. 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.

A handwritten signature in blue ink, appearing to read "James G. Huse, Jr.", is positioned above the printed name.

James G. Huse, Jr.

Attachment

cc  
Jo Ellen Felice  
Fritz Streckewald  
Ellen Baese

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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**FINANCIAL-RELATED AUDIT OF  
A. HOLLY PATTERSON EXTENDED  
CARE FACILITY – A REPRESENTATIVE  
PAYEE FOR THE  
SOCIAL SECURITY ADMINISTRATION**

June 2002

A-02-02-12034

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**AUDIT REPORT**

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## **Mission**

**We improve SSA programs and operations and protect them against fraud, waste, and abuse by conducting independent and objective audits, evaluations, and investigations. We provide timely, useful, and reliable information and advice to Administration officials, the Congress, and the public.**

## **Authority**

**The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:**

- Conduct and supervise independent and objective audits and investigations relating to agency programs and operations.**
- Promote economy, effectiveness, and efficiency within the agency.**
- Prevent and detect fraud, waste, and abuse in agency programs and operations.**
- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.**
- Keep the agency head and the Congress fully and currently informed of problems in agency programs and operations.**

**To ensure objectivity, the IG Act empowers the IG with:**

- Independence to determine what reviews to perform.**
- Access to all information necessary for the reviews.**
- Authority to publish findings and recommendations based on the reviews.**

## **Vision**

**By conducting independent and objective audits, investigations, and evaluations, we are agents of positive change striving for continuous improvement in the Social Security Administration's programs, operations, and management and in our own office.**

# Executive Summary

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## OBJECTIVE

Our objectives were to determine whether the A. Holly Patterson Extended Care Facility (AHP) (1) had effective safeguards over the receipt and disbursement of Social Security benefits and (2) ensured that Social Security benefits were used and accounted for in accordance with the Social Security Administration's (SSA) policies and procedures.

## BACKGROUND

Some individuals cannot manage or direct the management of their finances because of their age or mental and/or physical impairments. Congress granted SSA the authority to appoint representative payees (Rep Payee) to receive and manage these beneficiaries'<sup>1</sup> payments. A Rep Payee may be an individual or an organization. SSA selects Rep Payees for Old-Age, Survivors and Disability Insurance beneficiaries or Supplemental Security Income (SSI) recipients when representative payments would serve the individual's interests.

Rep Payees are responsible for using benefits to serve the best interests of the beneficiary or recipient. Their duties include:

- Using benefits to meet the beneficiary or recipient's current and foreseeable needs;
- Conserving and investing benefits not needed to meet the individual's current needs;
- Maintaining accounting records of how the benefits are received and used;
- Reporting events to SSA that may affect the individual's entitlement or benefit payment amount;
- Reporting any changes in circumstances that would affect their performance as a Rep Payee; and
- Providing SSA annual *Representative Payee Reports* (RPR) accounting for how benefits were spent and invested.

AHP (formerly A. Holly Patterson Geriatric Center) is a nonprofit, 889-bed skilled nursing facility in Uniondale, New York. During our audit period, AHP was the Rep Payee for 313 beneficiaries who received Social Security benefits.

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<sup>1</sup> We use the term "beneficiary" generically in this report to refer to both Old-Age, Survivors and Disability Insurance beneficiaries and SSI recipients. A distinction is made when we refer to SSI recipients only.

## **RESULTS OF REVIEW**

AHP generally (1) had effective safeguards over the receipt and disbursement of Social Security benefits and (2) ensured Social Security benefits were used and accounted for in accordance with SSA's policies and procedures. However, we identified several areas where AHP could improve its performance as a Rep Payee. Specifically, in five cases, SSI recipients were overpaid \$1,890 because AHP did not report to SSA that the recipients had exceeded SSI resource limits. Based on the results of our statistical analysis, we estimate that SSA overpaid AHP at least \$3,901 for at least 13 beneficiaries during our audit period. Also, in three cases, AHP reported incorrect expense information on RPRs.

## **CONCLUSIONS AND RECOMMENDATIONS**

Generally, the Rep Payee met its responsibilities. However, we found a few areas where AHP could improve its performance as a Rep Payee. We recommend that SSA:

- Ensure the Rep Payee reviews all SSI cases with conserved fund balances over \$2,000, quantifies the overpayments, and returns the overpaid funds to SSA.
- Re-emphasize procedures with the Rep Payee for notifying SSA when events occur that affect the eligibility of individuals in its care.
- Clarify procedures with the Rep Payee for preparing the RPRs.

## **AGENCY COMMENTS**

In response to our draft report, SSA agreed with our recommendations. (See Appendix B for SSA's comments.)

## **REP PAYEE COMMENTS**

In response to our draft report, the Rep Payee reported that it strengthened its procedures and will be working with SSA to improve its performance as a Rep Payee. (See Appendix C for the Rep Payee's comments.)

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# Acronyms

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AHP	A. Holly Patterson Extended Care Facility
NHCC	Nassau Health Care Corporation
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
Rep Payee	Representative Payee
RPS	Representative Payee System
RPR	Representative Payee Report
SSA	Social Security Administration
SSI	Supplemental Security Income

## OBJECTIVE

Our objectives were to determine whether the A. Holly Patterson Extended Care Facility (AHP) (1) had effective safeguards over the receipt and disbursement of Social Security benefits and (2) ensured that Social Security benefits were used and accounted for in accordance with the Social Security Administration's (SSA) policies and procedures.

## BACKGROUND

Some individuals cannot manage or direct the management of their finances because of their age or mental and/or physical impairments. Congress granted SSA the authority to appoint representative payees (Rep Payee) to receive and manage these beneficiaries and recipients' payments.<sup>1</sup> A Rep Payee may be an individual or an organization. SSA selects Rep Payees for Old-Age, Survivors and Disability Insurance (OASDI) beneficiaries or Supplemental Security Income (SSI) recipients when representative payments would serve the individual's interests.

## REPRESENTATIVE PAYEE RESPONSIBILITIES

Rep Payees are responsible for using benefits to serve the best interests of the beneficiary or recipient. Their duties include:

- Using benefits to meet the beneficiary or recipient's current and foreseeable needs;
- Conserving and investing benefits not needed to meet the individual's current needs;
- Maintaining accounting records of how the benefits are received and used;
- Reporting events to SSA that may affect the individual's entitlement or benefit payment amount;
- Reporting any changes in circumstances that would affect their performance as a Rep Payee; and
- Providing SSA annual *Representative Payee Reports* (RPR) accounting for how benefits were spent and invested.<sup>2</sup>

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<sup>1</sup> 42 U.S.C. §§ 405(j), 1383(a)(2).

<sup>2</sup> Id.; 20 C.F.R., part 404, subpart U and part 416, subpart F.



About 7 million individuals have Rep Payees—approximately 4.4 million are OASDI beneficiaries, 2 million are SSI recipients, and 600,000 are entitled to both OASDI and SSI. The following chart reflects the types of Rep Payees and the number of individuals they served as of November 2001.

Type of Rep Payee	Number of Rep Payees	Number of Individuals Served
<i>Individual Payees: Parents, Spouses, Adult Children, Relatives, and Others</i>	4,949,000	6,160,000
<i>Organizational Payees: State Institutions, Local Governments and Others</i>	44,150	759,000
<i>Organizational Payees: Fee-for-Service</i>	850	81,000
<b>TOTAL</b>	<b>4,994,000</b>	<b>7,000,000</b>

AHP (formerly A. Holly Patterson Geriatric Center) is a nonprofit, 889-bed skilled nursing facility in Uniondale, New York. AHP opened in 1961 as a skilled nursing facility for the elderly residents of Nassau County. AHP became a subsidiary of the Nassau Health Care Corporation (NHCC) on September 29, 1999. NHCC—a public benefit corporation—was created to acquire and operate the health facilities of Nassau County, New York. During our audit period, AHP was the Rep Payee for 313 individuals who were receiving Social Security benefits.

AHP provides residents receiving OASDI benefits \$50 per month from their benefits for their personal expenses. SSI recipients receive only \$35 per month in payments from SSA, and AHP provides this entire amount to the residents for their personal expenses. The \$35 payment comprises a \$30 Federal payment and a \$5 State supplement. According to SSA’s procedures, SSI recipients who reside in AHP only receive \$35 per month for personal expenses since they are in a facility that is certified to receive Medicaid payments. Medicaid per diem payments cover the SSI recipient’s housing and food costs. SSI recipients receive an additional \$20 per month from the New York Department of Social Services for their personal expenses.

**SCOPE AND METHODOLOGY**

Our audit covered the period May 1, 2000 through April 30, 2001. During this period, AHP served as Rep Payee for 313 individuals. From this population, we selected a random sample of 50 individuals for substantive testing. To accomplish our objectives, we:

- Reviewed the Social Security Act, SSA regulations, rules, policies and procedures pertaining to Rep Payees.

- Contacted SSA regional and field office staff to obtain background information about the Rep Payee's performance.
- Obtained from SSA's Representative Payee System (RPS) and the Rep Payee a listing of individuals who were in the Rep Payee's care and received SSA funds any time during May 1, 2000 through April 30, 2001.
- Compared and reconciled the RPS and the Rep Payee's listings to identify the population of SSA individuals who were in the Rep Payee's care from May 1, 2000 through April 30, 2001.
- Reviewed and tested the Rep Payee's internal controls over the receipt and disbursement of OASDI benefits and SSI payments.
- Performed the following tests for each of the 50 individuals in our random sample.
  - Compared and reconciled benefit amounts paid according to the Rep Payee's records to benefit amounts paid according to SSA's records.
  - Reviewed the Rep Payee's accounting records to determine whether benefits were properly spent or conserved on the individual's behalf. We also determined whether SSA was due a refund of any overpaid benefits.
  - Traced a sample of recorded expenses to source documents and examined the underlying documentation for reasonableness and authenticity.
- Projected the results of our sample to the population (see Appendix A for details of our sampling methodology).
- Interviewed three beneficiaries, personal guardians, or caregivers to determine whether their basic needs were being met.
- Requested a sample of 30 RPRs from SSA to determine whether income and expenses were correctly reported.
- Reviewed 28 RPRs provided by the Rep Payee to determine whether the Rep Payee properly reported to SSA how benefits were used.
- Reviewed a sample of 10 Rep Payee applications (Form SSA-11) to evaluate the completeness and appropriateness of the information provided on the applications.

We performed our audit in Uniondale, New York, and the Office of the Inspector General's New York field office between August and December 2001. We conducted our audit in accordance with generally accepted government auditing standards.

# Results of Review

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AHP generally (1) had effective safeguards over the receipt and disbursement of Social Security benefits and (2) ensured Social Security benefits were used and accounted for in accordance with SSA's policies and procedures. However, we identified a few areas where AHP could improve its performance as a Rep Payee. Specifically, in five cases, SSI recipients were overpaid \$1,890 because AHP did not report to SSA that the recipients had exceeded SSI resource limits. Based on the results of our statistical analysis, we estimate that SSA overpaid AHP at least \$3,901 for at least 13 beneficiaries during our audit period. Also, in three cases, AHP reported incorrect expense information on RPRs.

## **OVERSIGHT OF SSA BENEFITS**

We determined that, for the 50 beneficiaries who received \$284,769 in SSA funds during our audit period, AHP accurately recorded benefits SSA paid it as well as expenses incurred on behalf of the individuals under its care. Our tests concluded that AHP maintained source documents for the sample items, which allowed us to determine the expenses were reasonable and valid.

## **EXCESS RESOURCES**

Under the SSI program, a recipient is limited to \$2,000 in resources to remain eligible for payment. If a recipient exceeds this resource limit, SSA suspends his or her payments. Such payments resume when the recipient's resources fall below the limit. The Rep Payee must notify SSA (1) of any event that affects the recipient's entitlement to benefits and (2) if a recipient's resources exceed \$2,000 in any month.

During our audit period, 5 of the 50 cases we reviewed had conserved funds over the \$2,000 SSI resource limit. As a result, these individuals received \$1,890 in overpayments from May 1, 2000 through April 30, 2001. The following table provides detailed information for our sample cases.

	Cases Reviewed	SSI Payments	OASDI Benefits	Total SSA Funds Paid	Cases Overpaid	Amount Overpaid
SSI Only	14	\$5,530	0	\$5,530	5	\$1,890
OASDI Only	34	0	\$277,327	277,327	0	0
Concurrent	1	210	1,702	1,912	0	0
No SSA Payments <sup>3</sup>	1	0	0	0	0	0
Total	50	\$5,740	\$279,029	\$284,769	5	\$1,890

Of the five cases overpaid, three individuals' conserved fund balances exceeded \$2,000 for the 12-month audit period; while two only had excess balances for a portion of our audit period. For example, the balance for one individual ranged from \$3,553 to \$4,202. As a result, the individual was ineligible for SSI payments. AHP did not report the excess resources to SSA and therefore received \$420 in SSI payments for which the individual was not eligible. AHP agreed with our findings and informed us that corrective actions had been or would be taken in all five cases.

## ACCURACY OF REP PAYEE REPORTS

We examined 28 RPRs obtained from AHP and found that most were accurate with regard to accounting for benefits. However, three of the reports incorrectly reported amounts as spent for the beneficiaries' food and housing. Rep Payees are required to classify expenditures on the RPRs based on how the funds were spent. For the three cases, funds spent for personal items were classified as having been spent for food and housing. All three RPRs were for SSI recipients. Since SSI recipients receive only \$35 per month in benefits, the entire amount is placed in an account for personal expenses. Since Medicaid paid all food and housing costs for all three cases, none of the SSI payments should have been reported on the RPRs as being spent on food and housing.

We requested 30 RPRs from SSA, but SSA could not locate all of the RPRs we requested. Therefore, we were unable to determine whether AHP actually reported to SSA how benefits were accounted for in all cases. (See the Other Matters section of this report for a further discussion on RPRs.)

<sup>3</sup> This case did not receive Social Security benefits during our audit period but received Veterans Administration benefits only.

# Conclusions and Recommendations

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Generally, the Rep Payee met its responsibilities. However, we found a few areas where AHP could improve its performance as a Rep Payee.

We recommend that SSA:

1. Ensure the Rep Payee reviews all SSI cases with conserved fund balances over \$2,000, quantifies the overpayments, and returns the overpaid funds to SSA.
2. Re-emphasize procedures with the Rep Payee for notifying SSA when events occur that affect the eligibility of individuals in its care.
3. Clarify procedures with the Rep Payee for preparing the RPRs.

## AGENCY COMMENTS

In response to our draft report, SSA agreed with our recommendations. Specifically, SSA has initiated a training process with the staff at AHP regarding timely reporting of SSI events, appropriate maintenance of SSI accounts and accurate completion of RPRs. (See Appendix B for SSA's comments.)

## REP PAYEE COMMENTS

In response to our draft report, the Rep Payee reported that it strengthened its procedures and will be working with SSA to improve its performance as a Rep Payee. (See Appendix C for the Rep Payee's comments.)

# Other Matters

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## **SSA's RETRIEVAL of RPRs**

Rep Payees are responsible for reporting how beneficiaries' payments are used by completing RPRs. Each year, the Rep Payee is required to submit these RPRs to SSA. To determine whether the Rep Payee properly completed and submitted RPRs, we requested the most recently completed RPRs from SSA for 30 of the Rep Payee's beneficiaries. SSA provided only 16 of the RPRs, while AHP provided 28 of the RPRs. Because SSA did not provide all the RPRs requested, we could not independently confirm the Rep Payee met its reporting responsibilities. Also, for the 14 RPRs SSA did not provide, we could not determine whether the Rep Payee properly submitted the reports. In addition, we were unable to determine whether the reason some RPRs were not provided was because they were unable to be located or because they were never submitted.

# *Appendices*

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## Sampling Methodology and Results

To complete our objective, we obtained a list from A. Holly Patterson Extended Care Facility (AHP) of all individuals for whom AHP was serving as a representative payee at any time between May 1, 2000 and April 30, 2001. From this list of 313 beneficiaries, we selected a random sample of 50 cases for detailed review. The results of our review of the sample cases are shown in the table below.

<b>Sample Results and Projections</b>	
Population size	313
Sample size	50
<b>Attribute Projection</b>	
Sampled cases overpaid	5
Projection of cases overpaid	31
Projection lower limit	13
Projection upper limit	60
<b>Variable Projection</b>	
Sample Results – Overpayments	\$1,890
Projection – Overpayments	\$11,831
Projection lower limit	\$3,901
Projection upper limit	\$19,762

Note: All projections were calculated at the 90-percent confidence level.



**Agency Comments**



## SOCIAL SECURITY

### MEMORANDUM

**Date:** June 14, 2002 S2D2-1

**To:** Assistant Inspector General for Audit

**From:** Regional Commissioner, N.Y.

**Subject:** Financial- Related Audit of A. Holly Patterson Extended Care Center (A-02-02-12034) - REPLY

This is in response to the draft report on the financial audit conducted by your staff at the A. Holly Patterson Extended Care Center, in Uniondale, New York.

The information contained in the report is valuable in that it provides insight into how a financial review is conducted by OIG Audit. As you know, SSA has the responsibility for monitoring the performance of organizational representative payees, fee-for-service payees and certain individual payees receiving benefits on behalf of others. It is extremely helpful to gain the perspective of an objective audit.

The report offered the three recommendations below where the facility could improve its performance as a representative payee. Our comments follow.

1. Ensure the payee reviews all SSI cases with conserved fund balances over \$2,000, quantifies the overpayments, and returns the overpaid funds to SSA.
2. Re-emphasize procedures with the payee for notifying SSA when events occur that affect the eligibility of individuals in its care.
3. Clarify procedures with the payee for preparing Representative Payee Reports.

We agree that each of these items must be addressed. The District Manager of our Freeport office has initiated a training process with the staff at A. Holly Patterson that should lead to timely reporting of SSI events, appropriate maintenance of SSI accounts and accurate completion of the Representative Payee Accounting Reports. She has established a special liaison in her office to oversee this process and to ensure lines of communication are open. This is particularly important because a new administrator of

the facility has been appointed and the responsibility of their SSA representative payee accounts reassigned to a new individual.

Your memo stated that the payee has also been asked to provide comments on the report. We would appreciate receiving a copy of their comments.

If your staff should have any questions, please have them contact Val Ryan of the Program Operations Center, at (212) 264-8354.

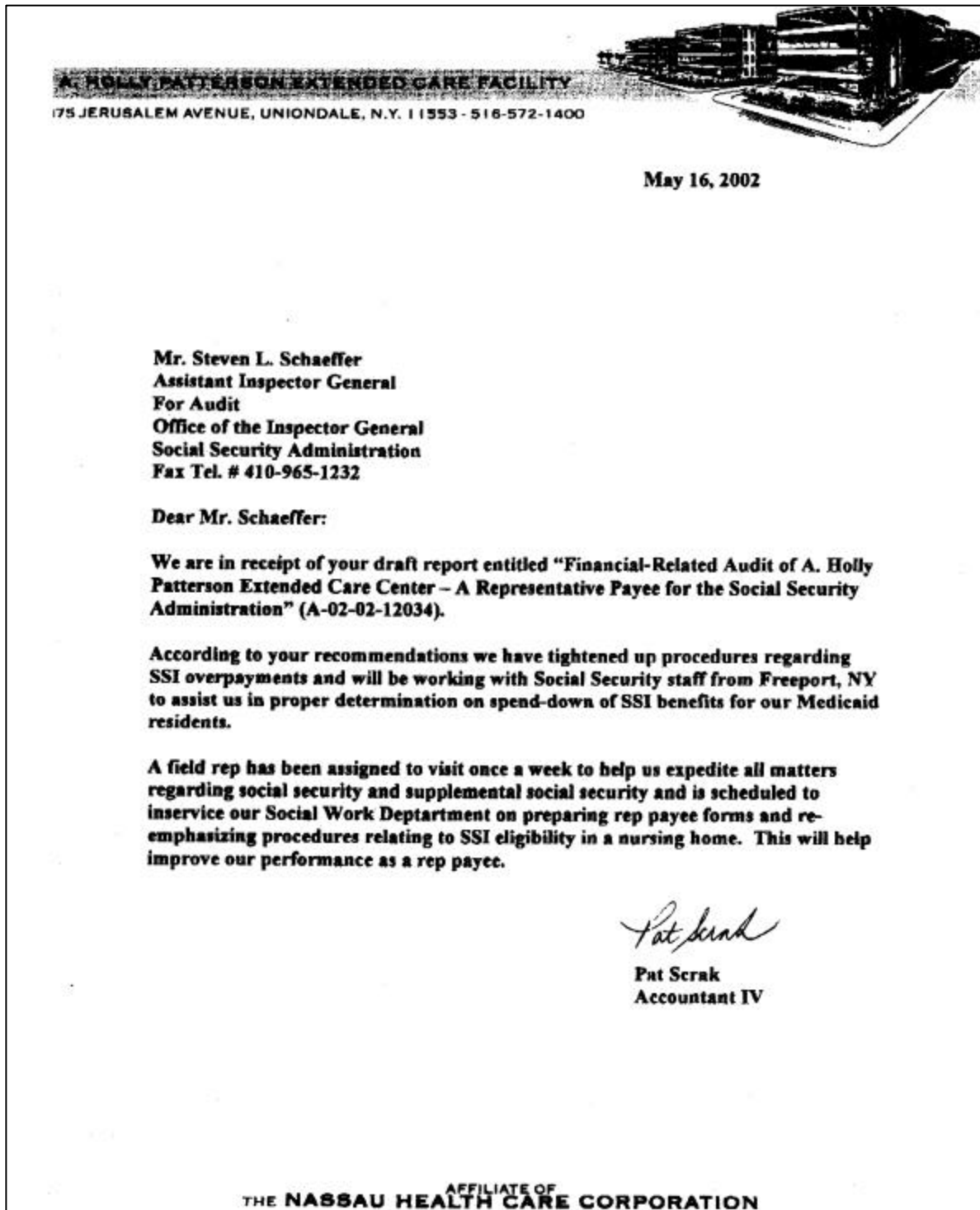
/s/

Beatrice M. Disman

CC: AC, OPSOS

CC: AC, OPB

Rep Payee's Comments



## **OIG Contacts and Staff Acknowledgments**

### **OIG CONTACTS**

Rona Rustigian, Director, Northern Audit Division, (617) 565-1819

Tim Nee, Deputy Director, (212) 264-5295

### **ACKNOWLEDGMENTS**

In addition to the persons named above:

Robert Blake, Senior Auditor

Arthur Treglia, Senior Auditor

For additional copies of this report, please visit our web site at [www.ssa.gov/oig](http://www.ssa.gov/oig) or contact the Office of the Inspector General's Public Affairs Specialist at (410) 966-1375. Refer to Common Identification Number A-02-02-12034.

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Treasurer, National Council of Social Security Management Associations, Incorporated	1
Social Security Advisory Board	1
AFGE General Committee	9
President, Federal Managers Association	1
Regional Public Affairs Officer	1
A. Holly Patterson Extended Care Facility	1
<b>Total</b>	<b>98</b>

# **Overview of the Office of the Inspector General**

## **Office of Audit**

The Office of Audit (OA) conducts comprehensive financial and performance audits of the Social Security Administration's (SSA) programs and makes recommendations to ensure that program objectives are achieved effectively and efficiently. Financial audits, required by the Chief Financial Officers Act of 1990, assess whether SSA's financial statements fairly present the Agency's financial position, results of operations, and cash flow. Performance audits review the economy, efficiency, and effectiveness of SSA's programs. OA also conducts short-term management and program evaluations focused on issues of concern to SSA, Congress, and the general public. Evaluations often focus on identifying and recommending ways to prevent and minimize program fraud and inefficiency.

## **Office of Executive Operations**

The Office of Executive Operations (OEO) provides four functions for the Office of the Inspector General (OIG) – administrative support, strategic planning, quality assurance, and public affairs. OEO supports the OIG components by providing information resources management; systems security; and the coordination of budget, procurement, telecommunications, facilities and equipment, and human resources. In addition, this Office coordinates and is responsible for the OIG's strategic planning function and the development and implementation of performance measures required by the Government Performance and Results Act. The quality assurance division performs internal reviews to ensure that OIG offices nationwide hold themselves to the same rigorous standards that we expect from the Agency. This division also conducts employee investigations within OIG. The public affairs team communicates OIG's planned and current activities and the results to the Commissioner and Congress, as well as other entities.

## **Office of Investigations**

The Office of Investigations (OI) conducts and coordinates investigative activity related to fraud, waste, abuse, and mismanagement of SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, physicians, interpreters, representative payees, third parties, and by SSA employees in the performance of their duties. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

## **Counsel to the Inspector General**

The Counsel to the Inspector General provides legal advice and counsel to the Inspector General on various matters, including: 1) statutes, regulations, legislation, and policy directives governing the administration of SSA's programs; 2) investigative procedures and techniques; and 3) legal implications and conclusions to be drawn from audit and investigative material produced by the OIG. The Counsel's office also administers the civil monetary penalty program.