Office of the Inspector General

Kenneth S. Apfel Commissioner of Social Security

Inspector General

Southwest Tactical Operations Plan: Investigative Results

Attached is the Inspector General's final report entitled, "Southwest Tactical Operations Plan: Investigative Results" (A-06-97-22008). The report presents the results of the Southwest Tactical Operations Plan and our review of characteristics shared by recipients whose payments were suspended. We have added a finding and modified the recommendations for clarification purposes based on comments we received during the exit conference.

You may wish to comment on any further action taken or contemplated on our recommendations. If you choose to offer comments, please provide your comments within the next 60 days. If you wish to discuss the final report, please call me or have your staff contact Pamela J. Gardiner, Assistant Inspector General for Audit, at (410) 9 65-9 700.

David C. Williams

Attach ment

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EXECUTIVE SUMMARY

OBJECTIVES

Our objectives were to (1) provide information on the results of the Southwest Tactical Operations Plan (STOP) and (2) identify characteristics of individuals who provided false information to obtain Supplemental Security Income (SSI).

BACKGROUND

SSI has specific eligibility requirements. One of the primary requirements is that individuals must be U.S. residents, and either citizens, nationals, or eligible aliens. (The formers tandards under title XVI of the Social Security Act provided SSI to aliens law fully admitted for permanent U.S. residence; or aliens permanently residing in the United States under color of law. Several recent laws and amendments have made changes to the SSI alien program. 1) In addition, individuals must maintain a continued presence in the United States. 2

Social Security Administration (SSA) staffin field offices (FO) along the U.S.-Mexico border have alleged that individuals are qualifying for SSI while in the United States and subsequently move to a foreign country. If not detected, recipients will continue receiving payments for which they are not eligible. The SSA Office of the Inspector General (OIG) implemented STOP in El Paso, Texas, to determine if individuals are fraudulently receiving SSI payments.

We requested an extract of data from the Supplemental Security Record (SSR), the data base SSA uses to maintain information on SSI recipients. We selected all SSI recipients with a mailing address in the 79901 and 79912 I IPcodes of EI Paso, Texas. A letter was sent to these recipients requesting that they provide, by mail, documents to prove that they are U.S. residents. Any individual who did not provide documentation, provided insufficient documentation, or had a questionable address was investigated to establish residency. We used data analysis software programs to analyze the collected data.

¹ Public Law 104-19 3; Public Law 104-208; Public Law 105-18, and Public Law 105-33.

i

According to the Program Operations Manual System, an individual who is not in the United States for 30 consecutive days is considered outside of the United States and is ineligible for SSI until he or she is in the United States for 30 consecutive days (SI 00501.410).

FIND INGS

- NEARLY ALL RECIPIENTS RESPONDED TO STOPLETTER
- MORE THAN ONE-FOURTH OF RECIPIENTS WERE INVESTIGATED.
- ONE-FOURTH OF INVESTIGATED RECIPIENTS HAD PAYMENTS SUSPENDED SAVING OVER \$2.9 MILLION
- SUSPENDED RECIPIENTS SHARE COMMON CHARACTERISTICS
- MORE THAN ONE-HALF OF SUSPENDED RECIPIENTS EXHIBITED FOUR OR MORE CHARACTERISTICS

CONCLUSION AND RECOMMENDATIONS

We identified a variety of characteristics associated with the individuals SSA suspended based on our investigative results. A majority of suspended recipients exhibited four or more of these characteristics. We recognize that nonresident claim ants and recipients from other FOs might exhibit different characteristics or combinations and/or frequencies of the same characteristics. However, our findings suggest that it is possible to develop indicators of nonresidents. This, combined with the number of the STO P-related suspensions and the resulting \$2,932,516 in costs awings based on a 5-year projection, suggests that SSA's efforts are well spent on trying to identify nonresidents. Therefore, we recommend that SSA:

- de ve lop guidance on using locally de term ined characteristics which would warrant in-depth investigation to accurately de term ine residency status;
- diary cases of recipients whose characteristics indicate they are likely to become nonresidents or who are prone to periods of absence from the United States for follow-up contacts (e.g., telephone calls to the stated residence to determine if the recipient is still residing there); and
- conduct face -to-face redeterminations with recipients whose characteristics suggest that they might be nonresidents or prone to periods of absence from the United States.

The costsavings are based on the total of overpayments made to suspended recipients combined with what SSA would have paid these individuals over a 5-year period had we not identified the residency issues. The actual costsavings may be less if individuals are able to re-establish residency and again receive SSI. See Appendix B for greater detail on how we developed the cost savings.

AGENCY COMMENTS

SSA agrees with our recommendations and plans to implement them. The Agency stated that techniques identified in this report and other residency studies will be used to develop recipient characteristics. These characteristics may be helpful locally in determining if recipients are residents and profiling those who should receive face-to-face redeterminations in order to establish and/or verify residency.

TABLE OF CONTENTS

Page	
EXECUTIVE SUMMARYi	
INTRO D UCTIO N	
FIND INGS 5	
■ NEARLY ALL RECIPIENTS RESPONDED TO STOPLETTER5	
■ MORE THAN ONE-FOURTH OF RECIPIENTS WERE INVESTIGATED	
ONE-FOURTH OF INVESTIGATED RECIPIENTS HAD PAYMENTS SUSPENDED SAVING OVER \$2.9 MILLION	
SUSPENDED RECIPIENTS SH ARE COMMON CH ARACTERISTICS	
MORE TH AN ONE-HALF OF SUSPENDED RECIPIENTS EXH IBITED FOUR OR MORE CHARACTERISTICS	
CONCLUSION AND RECOMMENDATIONS	
A PPEND ICES	
Appendix A - SSA's Comments to Draft Report	
Appendix B - Projected Cost Savings	
Appendix C - Major Report Contributors	
Appendix D - SSA Organizational Chart	

INTRODUCTION

OBJECTIVES

Our objectives were to (1) provide information on the results of STOP and (2) identify characteristics of individuals who provided false information to obtain SSI.

BACKGROUND

SSA administers two programs under the Social Security Act--title II (0 ld-Age, Survivors, and Disability Insurance) and title XVI (SSI). SSI, a needs-based program, provides assistance to aged, blind, or disabled adults, and blind or disabled children. SSI was established in 1972 and was intended to aid individuals who had little or no Social Security coverage.

SSI Eligibility

SSI has specific eligibility requirements. One of the primary eligibility requirements is that individuals must be U.S. residents, and either citizens, nationals or eligible aliens. (The formers tandards under title XVI of the Social Security Act provided SSI to aliens law fully admitted for permanent U.S. residence; or aliens permanently residing in the United States under color of law. Several recent laws and amendments have made changes to the SSI alien program.) In addition, individuals must maintain a continued presence in the United States.

Successfully obtaining SSI assistance generally brings automatic eligibility to Medicaid, Food Stamps, and other Federal and State programs. Since it is an entry point for receiving other assistance, the impact of individuals fraudulently receiving SSI is far-reaching.

SSA FO Allegations

SSA staffin FOs along the U.S.-Mexico border have alleged that individuals are qualifying for SSI while in the United States and subsequently move to a foreign country. If not detected, recipients will continue receiving payments for which they are not eligible. An OIG report on an SSA initiative in Chula Vista, California, disclosed that 47.2 percent of the SSI recipients that SSA staffire ferred for

residency verification were found ineligible because they were residing in Mexico.⁴ While problems similar to this might be occurring in other areas of the United States, it is believed to be most prevalent along the U.S.-Mexico border.

0 IG Pilot Project

The SSA OIG implemented STOP in EI Paso, Texas, to determine if individuals are fraudulently receiving SSI payments. The pilot project was intended to identify, suspend, and terminate SSI assistance to recipients receiving payments based on fraudulents tatements regarding residency. OIG also looked at other eligibility factors, including:

- age,
- disability,
- citizenship,
- type of residence,
- income, and
- resources.

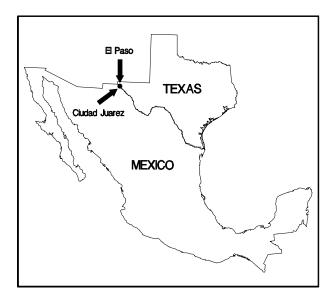
The pilot project included: (1) a mailer operation requesting that individuals mail in proof of residency; and (2) a matching operation with the U.S. Immigration and Naturalization Service and the Texas Bureau of Vital Statistics to validate SSA data related to citizenship, alien status, and birth records.

Both O IG Offices of Investigations (O I) and Audit (O A) worked on the pilot project. O I prim arily was responsible for investigating questionable cases (e.g., potential nonresidency) that arose as a result of the review; O A prim arily was responsible for analyzing the outcomes of the individual initiatives of the pilot project (e.g., mailer operation, the impact on the SSA FO). Based on these efforts, the O IG will determine the usefulness of such an effort in other locations.

⁴ SSA, OIG, The Adequacy of the Residency Verification Process for the Supplemental Security Income Program, A-06-96-62001, May 1997, page 5.

Project Location

We selected the EI Paso FO as the pilot project site because of its proximity to the U.S.-Mexico border. EI Paso, a city of approximately 652,000, shares its city border with the Mexican border. Directly across the Rio Grande (connected by various foot and automobile bridges) is Ciudad Juarez, Mexico, a city of approximately 1.2 million. The relative ease of travel be tween the two cities has resulted in many people identifying EI Paso and Ciudad Juarez as one large city. SSA staff and



El Paso residents with whom we spoke believed residency choices often are based on cost and proximity to family and friends rather than the desire to live in a specific country. Therefore, SSA staffhave suggested that some El Paso SSI recipients may not be meeting the residency requirements.

METH ODOLOGY

We requested an extract of data from the SSR, the data base SSA uses to maintain information on SSI recipients. We selected all SSI recipients with a mailing address in the 79901 and 79912 IPcodes of EIPaso, Texas. These IIP codes were selected judgmentally to address a variety of factors, including proximity to the U.S.-Mexico border, assumed household income levels, the nature and number of alleged nonresident recipients, and the number of recipients in the final sample.

We collected data from November 1996 through February 1997. A letter was sent to recipients requesting that they provide, by mail, documents to prove that they are U.S. residents. Any individual who did not provide documentation, provided insufficient documentation, or had a questionable address was investigated to establish residency. We used data analysis software programs to analyze the collected data. Since the primary focus of STOP was to verify residency, we did not determine whether recipients would remain eligible based on recently enacted or proposed legislative changes.

This report is one in a series of reports related to STOP. Additional reports focus on the demographic characteristics of sampled recipients, the impact of STOP on FO operations, and a planned follow-up review looking at the future payment status of suspended recipients. This inspection was conducted in accordance with the *Quality Standards for Inspections* is sued by the President's Council on Integrity and Efficiency.

FIND INGS

STO PRESULTS

NEARLY ALLRECIPIENTS RESPONDED TO STOP LETTER

Of the 2,107 SSI recipients to whom we sent letters, we included 2,089 (99.1 percent) in our residency review. The remaining 18 recipients (0.9 percent) were no longer eligible for SSI and were excluded from our review. Reasons for their exclusion are shown below.

Table 1: Recipients Excluded From STOP

Reason Excluded from Review	Num ber Excluded from Review
D ie d	10
Excess Income or Resources	4
In Prison	3
Not Disable d	1

Forty-Five Percent of Recipients or Their Representatives Responded to the STOP Letter In-Person

Although the STOP letter requested recipients or their representatives to mail their response, 45.2 percent of the cases resulted in an initial face-to-face contact with recipients or their representatives. The STOP workers collected and reviewed documentation and interviewed these individuals. For those providing documentation through the mail, STOP workers did not interview the recipients or their representatives unless they failed to provide adequate documentation.

Table 2: Type of Initial Contact in Response to Mailer

Initial Contact	Num berofCases	Percentage of Cases
Mail	1,105	52.9
Office Visit	9 4 4	45.2
Pi one	18	O.9
No Contact	22	1.0
Total	2,089	100.0

Most Recipients or Their Representatives Provided Rent and Utility Receipts to Verify Residency

In order to support their claim of residency, we requested that these recipients provide, by mail, evidence of their U.S. residency for the past year. The types of evidence we asked for included:

- (1) property, income, or other tax payment records;
- (2) utility bills, leases, or rent payment records; and
- (3) documents that show participation in social service programs.

Of the 2,089 sampled recipients, 1,922 (92.0 percent) provided one or more documents to support their residency. Rent and for utility receipts were provided most often as residency-supporting documents. Of the 1,922 recipients providing documents, 1,309 (68.1 percent) provided rent receipts and 1,060 (55 percent) provided utility receipts.

MORE THAN ONE-FOURTH OF RECIPIENTS WERE INVESTIGATED

We considered 661 (31.6 percent) recipients for further investigation based on their response--645 because they provided inadequate documentation to support their residency or had a questionable address and 16 because they were over age 80.5 Prior to conducting the investigations, 65 recipients or their representatives provided evidence to support residency. Therefore, excluding the recipients referred strictly based on age and those that subsequently provided documentation, we investigated 580 recipients (27.8 percent) due to residency concerns.

The Most Frequently Stated Reason for Investigation Was Insufficient Evidence of Residency

Of the 580 investigated recipients, 304 (52.4 percent) were investigated based on their failure to provide sufficient evidence to support their residency. Other reasons included recipients initially failing to respond to our letter (116 or 20.0 percent), preliminary findings of residency issues (83 or 14.3 percent), questionable addresses (74 or 12.8 percent), and other (3 or 0.5 percent).

6

We found the 16 recipients investigated because of age to be alive. We had determined that they were residents of the United States based on their responses to our letter.

ONE-FOURTH OF INVESTIGATED RECIPIENTS HAD PAYMENTS SUSPENDED SAVING OVER \$2.9 MILLION

Of the 580 recipients investigated, 153 (26.4 percent-or 7.3 percent of total reviewed population) failed to meet residency requirements. Suspending these individuals produced a projected 5-year costsavings of \$2,932,516 in SSI payments. The reasons why payments were suspended for these 153 individuals are shown below.

Table 3: Reasons SSI Payments Suspended

Re as ons Payments Sus pended	Num berofSuspended Recipients	Pe rce nt of Sus pe nde d Re cipie nts
Recipients Residing Outside the United States	134	87.6
Recipient not in the United States for 30 Continuous Days	16	10.4
Failure to Respond to Letter	3	2.0

CH ARACTERISTICS OF SUSPENDED RECIPIENTS

We reviewed available SSA data on the 153 recipients whose SSI payments were suspended to determine if characteristics existed that could have led us to question their residency in the United States and, in turn, conduct additional reviews and/or investigations. In the remainder of the report, we discuss characteristics common to these 153 STOP recipients, as well as characteristics STOP workers thoughtwould be indicators of nonresidency prior to conducting STOP.

SUSPENDED RECIPIENTS SHARE COMMON CHARACTERISTICS

More Than Three-Quarters of Suspended Recipients II ad No Face-to-Face Rede term ination Interview with SSA in 2 or More Years

Of the suspended recipients, 79.8 percenth ad no face-to-face redeterm ination review with SSA in 2 or more years. This outcome is not entirely unexpected. SSA procedures require face-to-face redeterm inations in specific instances only (e.g., cases that match established profiles) and these results are similar to those of other sampled recipients. If owe ver, lack of face-to-face contact be tween SSA and recipients limits SSA's ability to ascertain whether individuals remain

U.S residents. Table 4 summarizes the length of time since suspended recipients last had a face-to-face redetermination with SSA.

Table 4: Last SSA Face-To-Face Rede term ination Review

Ye ars Since Last Face-To-Face Re vie w	Num berofSuspended Recipients	Percent of Suspended Recipients
Less Than 1 Year	14	9.2
1 Year But Less Than 2 Years	17	11.1
2 Years But Less Than 4 Years	29	19 .0
4 Years But Less Than 7 Years	17	11.1
7 Years or More	76	49 .7

More Than Two-Thirds of Suspended Recipients Were Male

Although males accounted for 41.7 percent of all reviewed recipients, they accounted for 68.6 percent (105 out of 153) of recipients whose payments were suspended. In addition, 12.0 percent of all males had their payments suspended, while 3.9 percent of females did.

Table 5: Recipients Who Are Male

Ch aracte ris tic	A II Re cipie nts (n=2,089)	Not In ves tigate d (n=1,509)	In ves tigate d (n=580)	Sus pe nde d (n=153)
M ale	41.7%	39 .1%	48.6%	68.6%
	(n=872)	(n= 59 0)	(n= 282)	(n=105)

Almost Two-Thirds of Suspended Recipients II ave Codes That Reflect Alien Status

Of the 153 suspended recipients, 64.1 percent have status codes of "K," "P," "R," or "S." Each of these codes reflect alien status. In addition, 10.3 percent of all recipients with status codes reflecting an alien status had their payments suspended due to residency issues (9.8 of 9.53 recipients).

⁶ The codes' meanings are as follows: "K" — Law fully admitted to United States for perm anent residence; "P" — A lien who entered the United States before 1/1/1/2 with continuous residence since then (presumed legally admitted for perm anent residence); "R" — A lien granted legal temporary resident status; and "S" — A lien granted legal perm anent resident status.

Table 6: Recipients With "K," "P," "R," and "S" Alien Codes

Ch aracte ris tic	A II Re cipie nts (n = 2,089)	Not In ves tigate d (n = 1,509)	In ves tigate d (n=580)	Sus pe nde d (n = 153)
Selected Alien	45.6%	45.7%	45.3%	64.1%
Code	(n=953)	(n = 69 0)	(n=263)	(n=98)

Over One-Halfof Suspended Recipients Had at Least One Address Change

Address changes may indicate a lack of stability in the community. This may increase the likelihood that an individual may live outside the United States for a period of time. Of the suspended recipients, 59.5 percent had address changes in 1995 or 1996.

Table 7: Recipients With Address Changes in 1995 and 1996

Ch aracte ris tic	A II Re cipie nts (n=2,089)	Not In ves tigate d (n = 1,509)	In vestigated (n=580)	Sus pe nde d (n = 153)
Address	48.4%	44.5%	58.8%	59 .5%
Ch anges in	(n=1,012)	(n=671)	(n=341)	(n=9.1)
1995 or 1996				

One-Fourth of Suspended Recipients II ave Different Mailing and Residence Addresses

Recipients may have different mailing and residence addresses for a variety of reasons, including: (1) preference for having mail delivered to another person's residence, such as a parent or friend; (2) concern that mail may be stolen from a residence mail box; or (3) desire that SSI payments are received in a timely manner (when the recipient moves frequently). However, having different mailing and residence addresses also may assist some recipients in hiding the fact that they are not U.S. residents.

Although 6.2 percent of all reviewed recipients have different mailing and residence addresses, 25.5 percent of all suspended recipients have this characteristic. In addition, 39 of the 68 investigated recipients (57.4 percent) who have different residence and mailing addresses had their payments suspended.

Table 8: Recipients With Residence Addresses That Are Different Than Mailing Addresses

Ch aracte ris tic	A II Re cipie nts (n=2,089)	Not In ves tigate d (n = 1,509)	In ves tigate d (n=580)	Sus pe nde d (n = 153)
Different	6.2%	4.1%	11.7%	25.5%
Residence and	(n=130)	(n = 62)	(n = 68)	(n=39)
M ailing				
Addresses				

Almost One-Fourth of Suspended Recipients Live in Another Person's Household

Recipients residing in another person's household often had little documentation to support their residency. Virtually all documentation available was in the name of the owner or primary renter of the household--not in the recipient's name. Therefore, we investigated 69.2 percent (108 out of 156) of these recipients. After conducting these investigations--speaking with neighbors, allowing recipients to provide additional evidence--payments were suspended for 34.2 percent (37 out of 108) of those investigated who lived in another person's household. Overall, 24.2 percent of all suspended recipients alleged they were living in another person's household.

Table 9: Recipients Who Alleged Living in Another Person's Household

Ch aracte ris tic	A II Re cipie nts (n=2,089)	Not In ves tigate d (n=1,509)	Investigated (n=580)	Sus pe nde d (n = 153)
Li√e in Another	7.5%	3.2%	18.6%	24.2%
Person's	(n=156)	(n=48)	(n=108)	(n=37)
H ousehold				

Over One-Fifth of Suspended Recipients Rented Commercial Mail Boxes

SSA requires the street address /location of the residence from any person using a mail box as an address. By making a commercial mail box appear as a residence, the requirement is circum vented and the possibility of recipients receiving payments fraudulently increases. For example, we found several cases where recipients used an address similar to the following when using a commercial mail box:

123 Main Street, Apt. 45 El Paso, TX 79901 As shown in Table 10, 21.6 percent of all suspended recipients rented commercial mail boxes even though only 8.1 percent of those investigated rented such boxes. In fact, 70.2 percent (33 out of 47) of those investigated who rented commercial mail boxes had their SSI payments suspended.

Table 10: Recipients Who Rent Commercial Mail Boxes to Receive Their Mail

Ch aracte ris tic	A II Re cipie nts (n=2,089)	Not In ves tigate d (n = 1,509)	In ves tigate d (n=580)	Sus pe nde d (n = 153)
Re n ting	3.2%	1.3%	8.1%	21.6%
Com m e rcial	(n = 67)	(n=20)	(n = 47)	(n=33)
Mail Boxes				

A Im ost 0 ne-Fifth of Suspended Recipients Were 69 Years 0 Id or 0 Ider When They Applied for SS^{I}

SSA staffexpressed concern about individuals who initially applied for SSI later than age 65. They believed that most individuals who were eligible would apply for SSI upon reaching age 65. They concluded that individuals applying well after age 65 were more likely to be obtaining SSI fraudulently. However, the overall percentage of investigated individuals who were suspended (26.3 percent, or 152 out of 577) is only slightly lower than the percentage of investigated individuals over age 69 at time of SSI application who were suspended (30.3 percent, or 27 out of 89).

Table 11: Recipients Who Were 69 or Older at the Time They Applied for SSI

Ch aracte ris tic	A II Re cipie nts (n=2,070)	Not In ves tigate d (n = 1,49 3)	In√es tigate d (n=577)	Sus pe nde d (n=152)
69 or Olderat	13.2%	12.3%	15.4%	17.8%
Time of	(n=273)	(n=184)	(n = 89)	(n=27)
Application				

Less than One-Fifth of Suspended Recipients Use Direct Deposit

One method for recipients to receive SSI or other assistance while residing in a foreign country is to request that SSA "direct deposit" their checks into an account at a financial institution. As shown in Table 12, 15.7 percent of the suspended recipients had their checks direct deposited. However, this is lower than the overall figure of 18.0 percent for all reviewed recipients and suggests

11

Not all recipients had age information. Therefore, numbers of recipients listed in the table and narrative for this finding are less than corresponding numbers for other findings.

that other characteristics may play a greater role in residency fraud for this population.

Table 12: Recipients With Direct Deposit

Ch aracte ris tic	A II Re cipie nts (n=2,089)	Not In ves tigate d (n = 1,509)	In ves tigate d (n = 580)	Sus pe nde d (n = 153)
Dire ct De posit	18.0%	17.5%	19 .1%	15.7%
	(n=375)	(n=264)	(n=111)	(n=24)

Under One-Twentieth of Suspended Recipients II ad Prior Residency Issues

Although relatively small in number, what makes this significant is that 33.3 percent of all recipients (7 out of 21), and 50 percent of those investigated (7 out of 14), who had their SSI payments suspended in 1995 or 1996 due to residency issues again had their SSI payments suspended.

Table 13: Recipients With Prior Residency Issues

Ch aracte ris tic	A II Re cipie nts (n=2,089)	Not In ves tigate d (n = 1,509)	In ves tigate d (n=580)	Sus pe nde d (n = 153)
Prior Residency	1.0%	0.5%	2.4%	4.6%
ls s ue s	(n=21)	(n = 7)	(n=14)	(n = 7)

MORE THAN ONE-HALFOF SUSPENDED RECIPIENTS EXHIBITED FOUR OR MORE CHARACTERISTICS

Of the 153 suspended recipients, 58.9 percenth ad 4 or more of the 10 characteristics identified as indicators of nonresidency. However, our analysis of these characteristics did not point to a single profile (e.g., males living in another person's household using direct deposit and having a commercial mail box). In contrast, only 20.4 percent of all other recipients had four or more of the characteristics.⁸

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⁸ No recipients exhibited more than seven total characteristics.

Table 14: Recipients With Shared Characteristics

Num berof Characteristics	Percentage of Suspended Recipients	Percentage of All 0 ther Recipients
0	0.0	0.8
1	1.3	14.9
2	15.0	32.8
3	24.8	31.1
4	30.1	14.9
5	19 .6	4.3
6	7.2	1.0
7	2.0	0.2

CONCLUSION AND RECOMMENDATIONS

We identified 10 characteristics associated with the individuals SSA suspended based on our investigative results. A majority of suspended recipients exhibited four or more of these characteristics. We recognize that nonresident claim ants and recipients from other FOs might exhibit different characteristics or combinations and/or frequencies of the same characteristics. However, our findings suggest that it is possible to develop indicators of nonresidents. This, combined with the number of the STO P-related suspensions and the resulting \$2,932,516 in costs awings based on a 5-year projection, suggests that SSA's efforts are well spent on trying to identify nonresidents. Therefore, we recommend that SSA:

- 1. de ve lop guidance on using locally de term ined characteristics which would warrant in-depth investigation to accurately de term ine residency status;
- 2. diary cases of recipients whose characteristics indicate they are likely to become nonresidents or who are prone to periods of absence from the United States for follow-up contacts (e.g., telephone calls to the stated residence to determine if the recipient is still residing at the residence); and
- 3. conduct face-to-face redeterminations with recipients whose characteristics suggest that they might be nonresidents or prone to periods of absence from the United States.

AGENCY COMMENTS

SSA agrees with our recommendations and plans to implement them. (See Appendix A for the full text of SSA's comments.) The Agency stated that techniques identified in this report and other residency studies will be used to develop recipient characteristics. These characteristics may be helpful locally in determining if recipients are residents and profiling those who should receive face-to-face redeterminations in order to establish and/or verify residency. We have modified the report to address technical comments.

APPENDICES

SSA'S COMMENTS TO DRAFT REPORT

PROJECTED COST SAVINGS

Based on the investigation, the Office of the Inspector General (OIG) determined when an individual initially failed to meet the residency requirements and totaled all payments made between this month and the month the investigation took place to determine the amount of the overpayment. An example will help illustrate this point. OIG determined that an individual was living in Mexico as of December 1, 1994. The investigation took place in January 1997. Assuming the payment was \$295 a month for the entire period, the overpayment would total \$7,670 (26 x \$295) for this individual.

O IG used the month ly payment amount for an individual and multiplied it by 60 to determine the 5-year costs awings for the individual. Using the above example, the 5-year costs awings associated with this individual would be $\$17,700 (60 \times \$295)$.

O IG totaled all overpayments and costs avings for the 153 suspended recipients to arrive at the \$2,932,516 in projected costs avings.

MAJOR REPORT CONTRIBUTORS

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For Additional copies of this report, please contact the Office of the Inspector General's Public Affairs Specialist at (410) 9 66-9 135. Refer to Common Identification Number A-06-9 7-22008.

SSA ORGANIZATIONALCH ART