Payment Accuracy Task Force Report: Title II Relationship and Dependency

Executive Summary

Determining and paying accurate and timely program benefits is a primary commitment of the Social Security Administration (SSA) to the American public, along with good stewardship of the Social Security trust fund and the General Revenue fund. Toward these goals, SSA, in a cooperative effort with the Office of the Inspector General (OIG), created the Payment Accuracy Task Force (PATF) in 1996. Annually, an Associate Commissioner-level Steering Committee designates the payment error category to be addressed and charters an intercomponent issue team to develop agency-wide recommendations for policy, programmatic, operational, and systems improvements.

The PATF Steering Committee selected title II relationship and dependency payment errors for its fourth review. From Fiscal Year (FY) 1995 through FY 1998, title II relationship and dependency payment processing errors accounted for the largest portion of Old-Age and Survivors Insurance overpayment dollars, nearly $650 million or 40 percent of overpayment dollars, as reported in SSA's annual *Stewardship* report to the Congress. As of FY 1998, the *Stewardship* report includes reviews of non-medical aspects of title II Disability Insurance cases.

The *Social Security Act* provides title II benefits payable to the spouse, child, or survivor of an entitled disabled, retired, or deceased worker and prescribes specific criteria for establishing relationship and dependency. Both Federal and State law must be considered in determining entitlement to benefits.

To analyze sources and causes of title II relationship and dependency payment errors, we gathered information from as many sources as possible during our 120-day charter, April through July 2000. We reviewed salient SSA, OIG, and General Accounting Office reports, and analyzed all FY 1997 and FY 1998 *Index of Dollar Accuracy* (*IDA*) and *Stewardship* deficiency cases. We also analyzed a random sample of 223 title II relationship/dependency records from the Recovery of Overpayments and Accounting Report (ROAR) system. We made site visits to 2 program service centers (PSC) in Philadelphia

and Maryland and 12 field offices in Maryland, Nevada, and Florida. We sought additional input from over 20 key experts in various SSA Headquarters components, members of the PATF Steering Committee, and members of our PATF issue team.

Findings and Recommendations

Our findings and recommendations focus on title II relationship and dependency payment errors involving child beneficiaries. Our case folder reviews of FY 1997 – FY 1998 *IDA* and *Stewardship* payment errors and ROAR records, combined with our field office and PSC staff interviews, pointed us in this direction. As such, we are recommending the following procedural and operational changes to help improve payment accuracy processing for title II relationship and dependency cases involving child beneficiaries.

- *Improving Ways to Determine Out-of-Wedlock Child Relationships*

  - ✓ Revising *Form SSA-2519* (Child Relationship Statement) to Consider State Law when Determining Entitlement for Out-of-Wedlock Children

    Recommendation 1 – Add the following wording to *Form SSA-2519* to help claims representatives (CR) develop relationships for out-of-wedlock children: "*State of domicile*:" and "*When considering the status of an out-of-wedlock child for entitlement, a child cannot be disallowed until applicable State intestacy law is considered*."

  - ✓ *Providing Additional Training to Emphasize Use of State Intestacy Law*

    Recommendation 2 – Place more emphasis on initial CR training and providing subsequent refresher training to emphasize consideration of State intestacy laws before disallowing a claim for an out-of-wedlock child.

- *Improving Ways of Determining Stepchild Dependency*

  - ✓ Revising *Form SSA-783* (Statement Regarding Contributions) and Developing Supplemental Tools for One-Half Support Computation

    Recommendation 3 – Modify *Form SSA-783* to include the number of individuals in a household and their income.

    Recommendation 4 – Develop supplemental tool(s) to help with one-half support computations, e.g., an interactive computation screen supported by the Interactive Computation Facility, a worksheet for manual computation, and/or a desk guide.

  - ✓ Expanding the *Program Operations Manual System (POMS)* to Improve Instructions on Determining One-Half Support for Stepchildren

    Recommendation 5 – Revise *POMS* to include the information from the September 1996 Office of Retirement and Survivors Insurance program circular on determining one-half support for stepchildren.

- *Emphasizing Use of Shared Process and the Report of Contact Screen to Document Child Relationship Disallowances*

  Recommendation 6 – Stress the importance of field office staff using Shared Process to document evidence and the *Report of Contact* screen to document special determinations so that reconsideration reviewers have needed information to process requests for reconsideration of an initial determination.

- *Increasing Awareness that Legal Precedent Opinions Are Available in POMS* on CD-ROM

  Recommendation 7 – Distribute a program circular or other form of communication to remind field offices and PSCs that

legal precedent opinions on State and District of Columbia law are available in *POMS* on CD-ROM.

- *Reinforcing Reporting Responsibilities*

  Recommendation 8 – Reinforce reporting responsibilities either by modifying the MCS screen and application path to output and print the "claim type specific" reporting responsibilities on the application receipt itself or by generating an alert on the *Developmental Worksheet* as a reminder to print reporting responsibilities. This would eliminate the need to revisit the claims path for additional printing.

- *Studying the Efficacy of Mailing Recontact Forms to Children Ages 15 to 17 to Detect Unreported Marriages*

  Recommendation 9 – Conduct a study to determine the feasibility of continuing to send Beneficiary Recontact Program mailers to children ages 15 to 17, and to discern whether there are more efficacious ways to detect unreported marriages for this age group.

Other Cross-Cutting Payment Accuracy Issues

We identified four overarching payment accuracy issues during this review. Three of these issues have continued to resurface since PATF's inception in 1996. We believe all of these issues will continue to impact payment accuracy now, as well as in the future.

- ✓ *Reassessing Reporting Responsibilities*

  Suggestion – SSA convene a workgroup to look at building and implementing a new title II reporting process model.

- ✓ *Providing Incentives to Ensure Staff Receive Ongoing Training*

  Suggestion – SSA convene a workgroup to discuss potential incentives for managers to provide time for ongoing training for their employees, e. g., giving some form of workload credit for training.

  Suggestion – Give all operating component staff the opportunity to receive some type of *POMS* on CD-ROM refresher training; provide all offices with at least one copy of the reference book, *SSA Text Retrieval Application;* and inform each office about the *POMS* on CD-ROM hotline.

- ✓ *Supplementing Interactive Video Training*

  Suggestion – Seek ways to supplement IVT training with on-site face-to-face training. Also, routinely canvas field offices on which policies they need refresher training. Follow up those suggestions with on-site training conducted by employees skilled in both policy application and training delivery. The pool of trainers could be drawn from employee volunteers who have the incentive and skills to meet the identified training needs. Also, conduct an evaluation of IVT delivery to maximize its effectiveness.

- ✓ *Obtaining "Proof of Age" Needed for Entitlement*

  Suggestion – Modify appointment notices to read "*Original birth certificate, if available, or other proof of birth."*

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Acronyms

CR	Claims Representative
DI	Disability Insurance
FY	Fiscal Year
IDA	Index of Dollar Accuracy
IVT	Interactive Video Training
MCS	Modernized Claims System
NH	Number Holder
OASI	Old-Age and Survivors Insurance
OIG	Office of the Inspector General
OPB	Office of Program Benefits
OQA	Office of Quality Assurance and Performance Assessment
ORSI	Office of Retirement and Survivors Insurance
PATF	Payment Accuracy Task Force
POMS	Program Operations Manual System
PSC	Program Service Center
RCC	Regional Chief Counsel
RPOC	Report of Contact
ROAR	Recovery of Overpayments and Accounting Report
RSI	Retirement and Survivors Insurance
SSA	Social Security Administration
SSN	Social Security number
SR	Service Representative

Forms

SSA-783	Statement Regarding Contributions
SSA-1372	Student's Statement Regarding School Attendance
SSA-1387	Advance Notice of Termination of Child's Benefits
SSA-1388	Report of Student Beneficiary at End of School Year
SSA-1587	Children Ages 15-17
SSA-1588	Children in Direct Pay or Young Widows With a Child
SSA-1390	Report of Student Beneficiary About to Attain Age 19
SSA-2519	Child Relationship Statement

Glossary of Terms

Error Dollars — Incorrect over- and underpayments made to a case as a whole.

Deficiency Dollars — Errors, which may be multiple, made to a case causing incorrect payments.

***Index of Dollar Accuracy* Review** — Measures the accuracy of initial claims decisions (awards and disallowances) and estimates the impact of over- and underpayments by projecting their value over the expected life of the award, i.e., projected over 150 months.

Intestacy — Pertains to inheritance rights; dying without leaving a will.

FY 1998 Stewardship Payment Accuracy Rates*

- Retirement and Survivors Insurance (RSI) over- and underpayments – 99.9 percent each
- Disability Insurance (DI) overpayments – 99.1percent; underpayments – 96.7 percent

FY 1997 Index of Dollar Accuracy RSI Payment Accuracy Rates*

- 99.8 percent

***Stewardship* Review** – Provides an overall payment accuracy for all beneficiaries in current pay status. Monthly, about 80 RSI and 40 title II DI cases are selected for review, which includes interviewing recipients or representative payees, making collateral contacts (as needed), and redeveloping all factors of eligibility as of the current sample month.

**Most recent available data*

Payment Accuracy Task Force Report: Title II Relationship and Dependency

Introduction

The Social Security Administration (SSA) is strongly committed to maintaining a high payment accuracy rate, along with responsible stewardship for both the Social Security trust fund and the General Revenue fund. In Fiscal Year (FY) 1999, SSA paid $386 billion in Old-Age, Survivors, and Disability Insurance benefit payments to almost 44.6 million beneficiaries,[1] including retired and disabled workers, their dependents, and survivors of insured workers.[2] SSA is vigilant in its efforts to ensure slippage does not occur in payment accuracy rates, especially when a small number of case errors can potentially result in sizeable dollar errors. For example, based on the amount of benefits paid in calendar year 1999, each tenth of a percentage point of benefits incorrectly paid would equate to approximately $386 million in incorrect payments.

Payment Accuracy Task Force

The Payment Accuracy Task Force (PATF) initiative is a cooperative effort between SSA and the Office of the Inspector General (OIG) to help ensure that payment accuracy rates remain high. Annually, an Associate Commissioner-level Steering Committee selects a payment error category for review and charters an intercomponent issue team.[3] The Issue Team develops agency-wide recommendations addressing the designated concern (see Appendices A and B). PATF assists SSA in its efforts to improve payment accuracy by identifying policy, program, operational, and systems changes that facilitate world-class service delivery. Since October 1996, PATF has issued three reports addressing either Old-Age and Survivors Insurance (OASI)

[1] *The 2000 Annual Report to the Board of Trustees of the Federal Old-Age and Survivors and Disability Insurance Trust Funds, Pursuant to 42 U.S.C.401(c)* and *1395t*(b)(2)

[2] Approximately 12 million or 28 percent of these beneficiaries receive benefits as a worker's dependent.

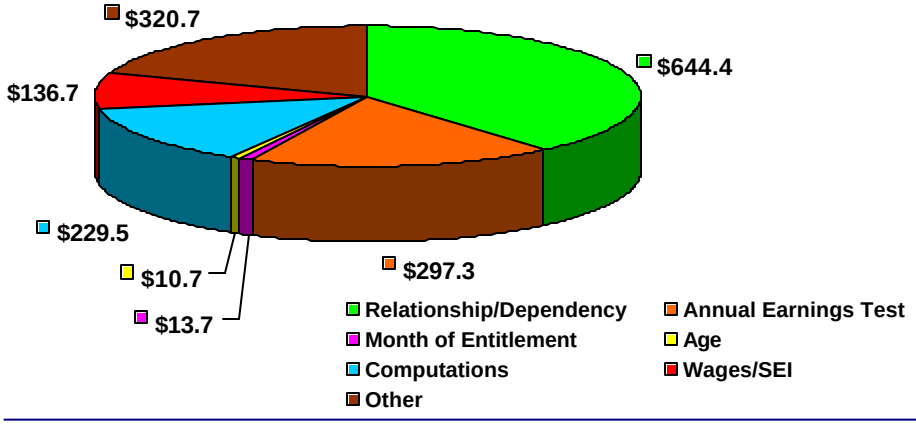
[3] The *Index of Dollar Accuracy* and *Stewardship* reports are used to determine the payment error category for review.

records or Supplemental Security Income earned and unearned income payment deficiencies.[4]

FY 2000 Issue — Title II Relationship and Dependency Payment Errors

PATF's fourth review is title II relationship and dependency payment errors. From FY 1995 through FY 1998, these payment errors accounted for the largest portion of OASI overpayment dollars in SSA's *Stewardship* report, nearly $645 million or 40 percent of the overpayment dollars (see figure 1).[5] Although the error cases were relatively small (3 percent), they generated high-deficiency dollars.

Figure 1. FY 1995 - FY 1998 *Stewardship* Overpayment Dollars (in millions)



[4] The prior PATF reports were *Payment Accuracy Task Force: Earnings Record Issue Team* (SSA/OIG, September 1997); *Payment Accuracy Task Force: SSI Earned Income Issue Team* (SSA/OIG, September 1998); and *Payment Accuracy Task Force-Supplemental Security Income-Unearned Income* (SSA/OIG, September 1999), see internet site -- <http://www.ssa.gov/oig/audit1.htm>.

[5] *FY 1998 Title II Payment Accuracy (Stewardship) Report* (Memorandum from the Deputy Commissioner for Finance, Assessment and Management, October 27, 1999). As of FY 1998, the *Stewardship* report includes reviews of non-medical aspects of title II Disability Insurance cases.

The title II relationship and dependency payment deficiency category encompasses a broad range of issues. These include, but are not limited to, issues associated with out-of-wedlock children, stepchildren, legally adopted children, student beneficiaries, common-law and deemed marriages, and beneficiary divorce. (See Appendix C for a list of the Office of Quality Assurance and Performance Assessments' [OQA] categorization of relationship/dependency deficiencies.)

Scope and Methodology

To determine the extent and causes of title II relationship and dependency payment errors, we gathered information from multiple sources. We reviewed salient OIG, General Accounting Office, and SSA reports,[6] as well as SSA initiatives related to title II relationship/dependency (see Appendix D). We also reviewed the 27 deficiency title II relationship/dependency cases from OQA's FY 1997 and FY 1998 *Index of Dollar Accuracy* (*IDA*) and *Stewardship* reviews (see Appendix E).

To augment the limited number of *IDA* and *Stewardship* deficiency cases, we used the Recovery of Overpayments and Accounting Report (ROAR) system to identify records with title II relationship/dependency overpayments. We selected records based on the fields: "Program Service Center" (PSC) so only domestic claims were included; "Type of Event" code; and an "Event Establishment Date" equal to or beyond August 31, 1999 (see Appendix F). We identified a universe of 25,716 ROAR records. From these, we randomly selected 223 cases for review.[7]

We also met with PSC and field office staff to identify potential policy, procedural, operational, and/or systems problems and solutions. In the Office of Central Operations in Baltimore, Maryland, the Center for Program Support staff helped us identify types of relationship and dependency claims that cause PSC technicians the most difficulty, and

[6] The FY 1998 *IDA* report was not completed at the time of this review.

[7] The ROAR sample was limited in that only overpayment records were identified. The extract was used to provide additional insight into the extent of overpayments that occur due to either systems or non-reporting problems.

the staff provided suggestions for minimizing errors. We also met with 10 reconsideration specialists, 5 claims authorizers, and 5 benefit authorizers in the Mid-Atlantic PSC in Philadelphia, Pennsylvania.

During May and June 2000, we visited 12 field offices in Maryland, Nevada and Florida to better understand the point-of-service process and identify any service barriers or best practices related to title II relationship/dependency case development.[8] We held individual and group discussions with 10 operations supervisors and/or management support staff, 120 claims representatives (CRs) and 56 service representatives (SR).

For a more comprehensive understanding of title II relationship/ dependency policy, procedures, operations, systems, and program administration, we spoke with over 20 key experts from various SSA Headquarters components (see Appendix G). The PATF Steering Committee representatives and the members of the PATF issue team also provided expert input about title II relationship/dependency payment errors and any related SSA activities underway to address these problems.

[8] We selected two field offices based on their proximity to Headquarters and served as pre-test sites. The other field offices were selected based on their dual ranking in the top 50 offices with the most Retirement and Survivors Insurance non-disability and Disability Insurance claims receipts. For economy, we added field offices that were near the top 50. Even so, the additional offices still ranked within the top 175 of 1300 field offices for Retirement and Survivors Insurance or Disability Insurance claims receipts.

Findings and Recommendations

Our findings and recommendations focused on title II relationship and dependency payment errors involving child beneficiaries. Our case folder reviews of FY 1997 – FY 1998 *IDA* and *Stewardship* payment errors and ROAR records, combined with our field office and PSC staff interviews, pointed us in this direction.[9] Nearly two-thirds of the FY 1997 – FY 1998 *IDA* and *Stewardship* cases we reviewed involved child-related payment processing errors, accounting for an estimated projection of over $208 million deficiency dollars (see Appendix E).[10] Field office and PSC staff also indicated that claims involving stepchildren and out-of-wedlock children were their most difficult to process. As such, we are recommending the following procedural and operational changes to help improve the accuracy of payment processing for title II relationship/dependency cases involving child beneficiaries.

Improving Ways of Determining Out-of-Wedlock Child Relationships

Out-of-wedlock children accounted for the largest number of FY 1997 - FY 1998 *IDA* title II relationship/dependency deficiency cases, representing an estimated projection of almost $40 million deficiency dollars. SSA has fixed protocols based on precise requirements of the *Social Security Act* that must be followed when

[9] Although divorce or marriage of a spouse error cases accounted for 40 percent of the FY 1997 – FY 1998 *IDA* and *Stewardship* title II relationship/dependency cases and 21 percent of our ROAR overpayment cases, the deficiencies were primarily caused by beneficiary failure to report and not field office processing errors. Very few of the field office or PSC staff we interviewed mentioned having problems with processing title II relationship/dependency cases involving marital relationships. There is little we can recommend to correct divorce or marriage of a spouse payment errors beyond reinforcing reporting responsibilities and a Office of Program Benefits and OIG effort to examine the feasibility of conducting States' Bureaus of Vital Statistics data matches to detect unreported marriages.

[10] This estimated projection is conservative since it does not include children who could be counted among the payment error cases involving marriage. *Note: Due to the small sample size, it is difficult to make reliable projections.*

developing relationship. For out-of-wedlock children, CRs must consult State intestacy law applicable to the primary numberholder's (NH's) State of residence (domicile).[11] CRs must be cognizant of the wide variations found among States' intestacy Laws. Our review of the FY 1997 – FY 1998 *IDA* and *Stewardship* relationship/dependency cases showed that out-of-wedlock children were being disallowed without consideration of applicable State intestacy law.

✓ Revising *Form SSA-2519* (Child Relationship Statement) to Consider State Law when Determining Entitlement for Out-of-Wedlock Children

Form SSA-2519 (Child Relationship Statement) is required in all disallowed child cases where the relationship to the primary NH is not established for an out-of-wedlock child. CRs are to assist the claimants in completing the form and to follow-up on any information needed to establish a child's entitlement. The form documents the potential existence of evidence that the primary NH acknowledged a parent-child relationship.

However, the form only assists CRs in developing child relationships under *section 216(H)(3)*[12] of Federal law. It does not provide guidelines for developing and documenting out-of-wedlock children under State intestacy law, which must be done before a disallowance can be considered proper.

To help ensure this type of payment error is reduced, we believe that *Form SSA-2519* should be modified to alert CRs about considering both Federal and State laws for cases involving out-of-wedlock children. Over one-half (51 percent) of the CRs we interviewed said it would be beneficial to modify the form to remind

[11] Where the child does not meet the provisions of State intestacy law, the adjudicator must consider the provisions of the Federal deemed child provision (*Social Security Act, section 216 [(h)][(3)]*).

[12] *Social Security Act, section 216 (h)(3)* states the NH must be decreed by a court to be the child's biological parent, be court ordered to contribute to a child's support because the child is his/her son or daughter, have acknowledged in writing that the child is his/her son or daughter, or be shown by evidence satisfactory to the Commissioner of Social Security to be the child's biological parent and must be living with or contributing to the child's support.

them to consider State intestacy law before disallowing an out-of-wedlock child.[13]

Recommendation 1

We recommend adding the following wording to *Form SSA-2519* to help CRs develop relationships for out-of-wedlock children:

- ***"State of domicile:"***
- ***"When considering the status of an out-of-wedlock child for entitlement, a child <u>cannot</u> be disallowed until applicable State intestacy law is considered."***[14]

✓ Providing Additional Training to Emphasize Use of State Intestacy Law

An Office of Retirement and Survivors Insurance (ORSI) report found that 83 percent of disallowance cases involving State intestacy law were processed incorrectly.[15] There was no indication that State intestacy law had been considered. The report suggests that the high incidence of incorrect cases could be an indicator that adjudicators are unaware of the requirement to use State intestacy law before disallowing a claim.

During our discussions with PSC reconsideration reviewers, we found they believed that CRs do not always consider State

[13] *Social Security Act, section 216(h)(2)(A*) requires use of State intestacy law that is applied by the State courts in which the worker was domiciled at the time of the application or at the time of death.

[14] State intestacy laws specify the requirements for establishing a parent-child relationship for inheritance purposes where the deceased NH died without leaving a will. As directed by the *Social Security Act*, SSA applies State intestacy law to establish a parent-child relationship in life and death claims.

[15] *Relationship and Disallowance Study*, Division of Entitlement and Program Management and Studies Staff, ORSI, March 1994.

intestacy laws before denying the claim of an out-of-wedlock child. Their opinion was based on the number of initial decisions made by CRs that they are overturning.

ORSI's findings and reconsideration reviewers' perceptions are consistent with what we heard from CRs. The CRs reported receiving insufficient training about considering State intestacy law before disallowing a claim. Almost 60 percent of the CRs could not recall being provided any training on processing out-of-wedlock child claims using State intestacy laws. Additionally, during initial CR training, there is only one statement about State intestacy laws contained in the training materials.[16]

Recommendation 2

- **Place more emphasis on initial CR training and providing subsequent refresher training to emphasize consideration of State intestacy laws before disallowing a claim for an out-of-wedlock child.**

Improving Ways of Determining Stepchild Dependency

As of July 1996, for a stepchild to become initially entitled, s/he must receive at least one-half support from the primary NH.[17] According to our review of FY 1997 – FY 1998 *IDA* and *Stewardship* title II relationship/dependency cases, incorrect determination of one-half support for stepchildren accounted for an estimated projection of over $12 million deficiency dollars.

[16] *Title II Claims Representative Basic Training Course*: "CAUTION: You may not disallow benefits for an illegitimate child solely because he/she does not qualify under *section 216(h)(3)*. You must develop the child's status under State law."

[17] *Program Operations Manual System GN 00306.232 Dependency Requirements – Stepchild*. Also, *The Contract With America Advancement Act of 1996* changed the dependency requirements for a stepchild. Before the law, a child had to "live with" or receive one-half support from the NH to be dependent.

✓ Revising *Form SSA-783* (Statement Regarding Contributions) and Developing Supplemental Tools for One-Half Support Computation

During our site visit discussions, 80 percent of the CRs and two-thirds of the reconsideration reviewers said that one-half support claims were their most difficult to process relative to other types of relationship/dependency claims. The most frequent problems CRs mentioned in processing relationship/dependency claims were development and computation of one-half support.

Form SSA-783 (Statement Regarding Contributions) is used to determine one-half support. The form captures such information as persons or agencies contributing to the stepchild's support, the stepchild's wages or income, and whether or not the stepchild lives with more than one parent. Either a pooled or non-pooled fund method is used to calculate one-half support.[18] SSA procedures prescribe that, unless excepted, the pooled fund method be applied first because it is less labor intensive.[19] However, to use the pooled fund method, certain information must be known, e.g., the number of persons living in a household and the amount of their income. This information is not captured on *Form SSA-783*.

Recommendations 3 & 4

To assist in more efficient and accurate development and calculation of one-half support for stepchildren, we recommend:

- **Modify *Form SSA-783* to include the number of individuals in a household and their income.**
- **Develop supplemental tool(s) to help with one-half support computation, e.g., an interactive computation screen**

[18] The pooled fund method assumes that all income coming into a household is co-mingled and that everyone shares equally in the funds used for support.

[19] If use of the pooled fund method results in one-half support being missed by a narrow margin, the non-pooled fund method is used. The non-pooled fund method calculates the actual cost of the stepchild's support and the NH's actual contributions towards that support.

supported by the Interactive Computation Facility,[20] a worksheet for manual computation, and/or a desk guide.

✓ **Expanding *Program Operations Manual System (POMS)* to Improve Instructions on Determining One-Half Support for Stepchildren**

In 1996, ORSI issued a program circular on determining one-half support for stepchildren.[21] The program circular has a destruction date of September 30, 1997 and is not available in *POMS* on CD-ROM. However, claims authorizers in the Office of Central Operations have been informed that the procedures are still valid.

Current *POMS* procedures on stepchild dependency requirements refer technicians to *POMS RS 1301.010* for guidance on how to determine one-half support.[22] However, the transmittal for that chapter of *POMS* has not been updated since April 1990, preceding the date of the ORSI program circular.

Recommendation 5

- **Revise *POMS* to include information from the September 1996 ORSI program circular on determining one-half support for stepchildren.**

[20] An interactive title II computation screen already exits. We are suggesting the capability to make one-half support computations be added to this site.

[21] *Determining One-Half Support for Stepchildren*, ORSI Program Circular, September 1996.

[22] *POMS GN 00306.232 Dependency Requirements – Stepchild and RS 01301.010 One-Half Support – General.*

Emphasizing Use of Shared Process and the Report of Contact Screen to Document Child Relationship Disallowances

POMS GN 00306.001E requires an adjudicator to document every decision that disallows a child for failure to establish a parent-child relationship. Documentation should include: the specific means used to meet the relationship requirement; the specific evidence requested; the efforts made to obtain information; and, if applicable, why the information was not obtained.[23] This written documentation constitutes an informal special determination.

POMS GN 00301.286 requires the adjudicator to electronically store evidentiary documents submitted in a claim by recording identifying data about the documents on the evidence screen from the Shared Process menu. An SSA employee can, at any time, use the evidence screen to determine whether an issue has already been proven and how. The data also provide an audit trail.

During our discussions with reconsideration reviewers, we were repeatedly told that identifying data about evidentiary documents are not recorded on Shared Process, but rather are recorded on the *Remarks* screen or the evidentiary document is certified and placed in a case folder. For some cases, we were told, the identifying information about evidentiary documents is not being recorded at all.

Often, the reconsideration reviewers are working with case folders that do not contain required documentation and, as a result, they have to either call the claims representative or re-contact the claimant for the same evidence. Even when the *Remarks* screen is used to document evidence, reconsideration reviewers said it does not provide the same level of detailed information as Shared Process would. Additionally, information placed on the *Remarks* screen can be overwritten or erased.[24]

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[23] *POMS GN 00306.001E – Parent Child Relationship General (Determining Status as a Child).*

[24] The use of Shared Process or other data collection systems would also coincide with the requirements of the *Government Paperwork Elimination Act of 1998*.

An ORSI study of relationship disallowance supports reconsideration reviewers concerns about special determinations and *Reports of Contact*. The study found that special determinations and report of contact information were frequently placed in case folders rather than noted on systems screens.[25] The study recommended that a reminder be sent to field offices to record all special determinations and report of contact information on the Modernized Claims System (MCS)[26] *Report of Contact (RPOC)* screen rather than placed in a case folder. This is particularly important to reconsideration reviewers because the *RPOC* screen allows them to directly access information.

However, what we heard during our field office discussions contradicted the reconsideration reviewers' concerns. Eighty-two percent of the CRs reported using Shared Process to record identifying data about evidentiary documents. Also, over half of the management support specialists and/or operations supervisors said they require their staffs to use Shared Process. Additionally, 93 percent of the CRs said they always use the MCS *RPOC* screen to document report of contact information and special determinations.

Recommendation 6

- **Stress the importance of field office staff using Shared Process to document evidence and the *RPOC* screen to document special determinations so reconsideration reviewers have needed information to process requests for reconsideration of an initial determination.**

Increasing Awareness that Legal Precedent Opinions Are Available in POMS on CD-ROM

As of July 1999, a compendium of Regional Chief Counsels' (RCC) legal precedent opinions on the application of State and District of Columbia law became available in *POMS* on CD-ROM, and it is

[25] *Relationship Disallowance Study*, ORSI, Internal Document, March 1994.

[26] See Appendix H for title II relationship/dependency MCS screens.

updated monthly.[27] However, 98 percent of the CRs and 9 of 10 reconsideration reviewers told us they were unaware the data base existed, saying they had never heard of it.

The State legal precedent opinions in *POMS* on CD-ROM provides all adjudicators with one, easily accessible, centrally maintained source for legal precedent opinions and a streamlined process for requesting new opinions.[28] The ability to update the data base each month provides immediate access to the most current advice on the application of State and District of Columbia law. This ensures claimants consistent, equitable treatment because adjudicators can more readily consider and apply the most current version of State law.

Recommendation 7

- **Distribute a program circular or other form of communication reminding field offices and PSCs that legal precedent opinions on State and District of Columbia law are available in *POMS* on CD-ROM.**

Reinforcing Reporting Responsibilities

SSA relies on claimants to self-report any changes that might affect the amount and continued receipt of benefit payments. Claimants are informed of their reporting responsibilities at the initial claim interview, as well as through a fact sheet, *Social Security Snapshot*; the MCS application that requires a claimant's signature showing agreement to

[27] The Office of Program Benefits was instrumental in developing the electronic process to access a compendium of legal precedents. Legal precedent opinions are legal advice that has been issued by the RCC on the application of State law, or Office of General Counsel (OGC) on DC law or foreign claims, in a coverage or title II or title XVI claim-related issue, and is designated for national distribution by the responsible Headquarters' Policy component (also, see *POMS GN 01010.800 ff. Legal Precedent Opinions)*.

[28] The legal precedent opinions are available in *part 15* (title II) and *part 16* (title XVI) of the *POMS* on *SSA PUBS* on CD-ROM. These chapters are the approved sources for legal precedent opinions for use in resolving coverage and title II and title XVI claims-related issues.

report events; the *Notice of Award*; periodic check stuffers; and media announcements and articles.

Even with the various ways SSA uses to inform claimants of their reporting responsibilities, almost two-thirds of the CRs told us claimants still assert they do not know they are supposed to self-report changes. Non-reporting still occurs despite the fact that CRs told us they advise claimants of their reporting responsibilities.

CRs are required to manually attach an instruction sheet with reporting responsibilities to the MCS claims receipt before giving it to the claimant. The instruction sheets are numbered to correspond with the appropriate claim type.[29] Since the claims receipt automatically prints out as the last page(s) of the application, we believe this is an opportune place to list reporting responsibilities, including those related to title II relationship/ dependency events. This method would provide the claimant with a visual, as well as hard copy, reminder.

Recommendation 8

- **Reinforce reporting responsibilities either by modifying the MCS screen and application path to output and print the "claims type specific" reporting responsibilities on the application receipt itself or by generating an alert on the *Developmental Worksheet* as a reminder to print the reporting responsibilities. This would eliminate the need to revisit the claims path for additional printing.**

Studying the Efficacy of Mailing Recontact Forms to Children Ages 15 to 17 to Detect Unreported Marriages

SSA's Beneficiary Recontact Program was implemented in 1993 to detect unreported marriages, reports of no child in-care situations for young widow/widowers, and unreported marriages for young children ages 15 to17. Being unmarried is a requirement for entitlement to child's benefits.

[29] For example, an applicant filing for retirement benefits will be given reporting responsibilities on *Form SSA-1 INST*.

Before 1996, there was a question on a representative payee accounting form that asked about a child's marital status. In 1996, children ages 15 to 17 began receiving mailed recontact forms to report their marital status. Seventy thousand mailers (840,000/year) were distributed per month to this age group in calendar year 1999, detecting only 522 marriages. Of those, only 49 were for children age 15.[30] Currently, recipients use about 163,000 burden hours to complete and return *Form 1588E* (Children in Direct Pay or Young Widow/Widower with a Child) and 835,000 burden hours for *Form 1587* (Children Age 15 to17).[31]

Additionally, 98 percent of the SRs told us they never or very seldom terminate benefits for 15 or 16-year-olds due to marriage. However, there were several instances in which SRs said they had referred an incorrect unreported marriage termination to a PSC so that a child could be reinstated. The incorrect determination was caused by failure to return *Form SSA-1587*.

The current process for identifying marital status of children ages 15 to17 appears to be neither cost-effective nor efficient. SSA pays approximately $375,000 per year for printing and mailing the recontact forms; but, in FY 1999, the mailings only identified about $470,000 in undetected overpayments. When offset against operational costs, the return-on-investment becomes negligible.

Recommendation 9

- **Conduct a study to determine the feasibility of continuing to send Beneficiary Recontact Program mailers to children ages 15 to 17, and to discern whether there are more efficacious ways to detect unreported marriages for this age group.**

[30] There are no available data to determine how many of the 49 terminations were subsequently reinstated.

[31] Burden hours are the amount of time it takes the public to complete government business, e.g., filling out forms, being interviewed.

Recap of Recommendations

Our findings and recommendations focus on title II relationship and dependency payment processing errors involving child beneficiaries. Our case folder reviews of FY 1997 – FY 1998 *IDA* and *Stewardship* payment errors and ROAR records, combined with our field office and PSC staff interviews, pointed us in this direction. Our recommendations for procedural and operational improvements are recapped below.

- *Improving Ways to Determine Out-of-Wedlock Child Relationships*

  - ✓ Revising *Form SSA-2519* (Child Relationship Statement) to Consider State Law when Determining Entitlement for Out-of-Wedlock Children

    Recommendation 1 – Add the following wording to *Form SSA-2519* to help CRs develop relationships for out-of-wedlock children: "*State of domicile*:" and "*When considering the status of an out-of-wedlock child for entitlement, a child cannot be disallowed until applicable State intestacy law is considered*."

  - ✓ Providing Additional Training to Emphasize Use of State Intestacy Law

    Recommendation 2 – Place more emphasis on initial CR training and providing subsequent refresher training to emphasize consideration of State intestacy laws before disallowing a claim for an out-of-wedlock child.

- *Improving Ways of Determining Stepchild Dependency*

  - ✓ Revising *Form SSA-783* (Statement Regarding Contributions) and Developing Supplemental Tools for One-Half Support Computation

    Recommendation 3 – Modify *Form SSA-783* to include the number of individuals in a household and their income.

Recommendation 4 – Develop supplemental tool(s) to help with one-half support computation, e.g., an interactive computation screen supported by the Interactive Computation Facility, a worksheet for manual computation, and/or a desk guide.

✓ Expanding *POMS* to Improve Instructions on Determining One-Half Support for Stepchildren

Recommendation 5 – Revise *POMS* to include the September 1996 ORSI program circular on determining one-half support for stepchildren.

- *Emphasizing Use of Shared Process and the Report of Contact Screen to Document Child Relationship Disallowances*

Recommendation 6 – Stress the importance of field office staff using Shared Process to document evidence and the *Report of Contact* screen to document special determinations so that reconsideration reviewers have needed information to process requests for reconsideration of an initial determination.

- *Increasing Awareness that Legal Precedent Opinions Are Available in POMS on CD-ROM*

Recommendation 7 – Distribute a program circular or other form of communication to remind field offices and PSCs that legal precedent opinions on State and District of Columbia law are available in *POMS* on CD-ROM.

- *Reinforcing Reporting Responsibilities*

Recommendation 8 – Reinforce reporting responsibilities either by modifying the MCS screen and application path to output and print the "claims type specific" reporting responsibilities on the application receipt itself or by generating an alert on the *Developmental Worksheet* as a reminder to print the reporting responsibilities. This would eliminate the need to revisit the claims path for additional printing.

- *Studying the Efficacy of Mailing Recontact Forms to Children Ages 15 to 17 to Detect Unreported Marriages*

  Recommendation 9 – Conduct a study to determine the feasibility of continuing to send Beneficiary Recontact Program mailers to children ages 15 to 17, and to discern whether there are more efficacious ways to detect unreported marriages for this age group.

Other Cross-Cutting Payment Accuracy Issues

We identified four overarching payment accuracy issues during our review. Three of these issues have continued to resurface since PATF's inception in 1996. We believe it is incumbent on us to mention all four since they will continue to impact payment accuracy now, as well as in the future.

❑ Reassessing Reporting Responsibilities

Both title II and title XVI payment accuracy depends on timely and accurate disclosure of information to determine initial and continued program eligibility and benefit amounts. In all four PATF reports, we have made recommendations and suggestions on how to improve the current process that relies heavily on self-reported information. However, the problem still persists about how SSA can ensure beneficiaries clearly understand, remember, and follow through with their reporting responsibilities so neither an incorrect eligibility decision nor incorrect benefit payment are made. SSA has acknowledged the reporting process needs to be reassessed by taking steps to build new models for student reporting and for title XVI. We believe it is time to do the same for title II.

Suggestion

We strongly suggest SSA convene a workgroup to look at building and implementing a new title II reporting process model.

❑ Providing Incentives to Ensure Staff Receive Ongoing Training

During this and our prior reviews, we found the amount of training staff receives varies widely among offices. Some provide training only when there are policy/procedural changes; others provide training as frequently as once a week. Workload demands appear to be one of the primary determinates of how much training is provided. Offices only receive work credits for production, so there is constant pressure to meet processing times. Office managers

have to decide the most efficient use of their resources and the time needed to meet public demands. As reported by the Social Security Advisory Board, *"…ongoing training is essential to building and maintaining the knowledge and skills employees need…Good training takes time, but time is in short supply as a result of downsizing and the struggle to keep up with daily workloads."*[32]

For example, we noted that one of the areas that consistently requires supplemental training is how to efficiently manipulate *POMS* on CD-ROM. During this review, two-thirds of field office staff reported they needed refresher training on how to retrieve information from the *POMS* on CD-ROM. Over one-third of field office staff said they rely on co-workers rather than *POMS* on CD-ROM when they need clarifications on policies/procedures to process a claim. This provides further evidence that *POMS* on CD-ROM is not being fully used. We were repeatedly told that *POMS* on CD-ROM is difficult to use; in particular, it is difficult to quickly search for information.

Suggestions

We offer two suggestions to help address these issues. We strongly urge SSA to convene a workgroup to discuss potential incentives for managers to provide time for ongoing training for their employees. We believe if some form of workload credit is given for training, more offices will stress training.

With respect to supplemental *POMS* on CD-ROM training, we suggest all operating component staff be given the opportunity to receive some type of refresher training. Additionally, we think all offices should have at least one copy of the reference book, *SSA Text Retrieval Application*, and should be informed about the *POMS* on CD-ROM hotline.[33]

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[32] *How the Social Security Administration Can Improve Its Service to the Public*, Social Security Advisory Board, September 1999.

[33] *POMS CD-ROM* Hotline Internet address is <POMS.Hotline@ssa.gov>; telephone number, (410) 965-5192. SSA's Digital Library, CD-ROM website page is http://library.ba.ssa.gov/library/research.htm.

❑ *Supplementing Interactive Video Training*

SSA is relying more than ever on systems technology to provide training to staff, e.g., Interactive Video Training (IVT) because it allows simultaneous national broadcasting to ensure uniform training. However, 90 percent of the interviewees said IVT was not their preferred training method, but would rather have face-to-face training. This latter mode of delivery allows for immediate feedback to questions and for tailoring the training to specific office needs. We also heard concerns about the broadcast panels' expertise and delivery skills. These concerns were also articulated during our FY 1999 PATF review.

We understand that field offices have different training needs depending on the segment of the population they serve. Also, we understand that field offices will have case specific issues that they want addressed and that IVT is not the forum for this kind of interchange because of the level of detail and number of policies that can be involved in any one case. These variations could impact the perception among some field personnel that panel expertise is lacking. Further, it is unrealistic to expect that individuals whose job skill is policy application will necessarily be skilled in delivery as well.

Suggestion

Accepting the limitations of IVT training and that field office training needs to continue to exist, we believe that SSA needs to take a proactive approach and seek ways to supplement IVT with on-site face-to-face training. We suggest that field offices routinely be canvassed on which policies they want refresher training, and follow-up those requests with on-site training conducted by employees skilled in both policy application and training delivery. The pool of trainers could be drawn from employee volunteers who have incentive and the skills to meet the identified training needs. In addition, we suggest an evaluation be conducted of IVT delivery to maximize its effectiveness.

❑ *Obtaining "Proof of Age" Needed for Entitlement*

Claimants filing an initial title II application are given or sent a notice to remind them of their appointment and what documents are needed. The appointment notice specifically tells the claimant the type of claim interview that is scheduled, the date and time of their appointment, the type of appointment (in-office or telephone), and the necessary proofs needed to establish their entitlement.

During our interviews with field office staff, it was brought to our attention that the notices only tell the claimant to provide "proof of age." It does not tell what is acceptable as preferred evidence for "proof of age," i.e., a public record of birth or a religious record established before the claimant obtained age 5.[34] The field offices are encountering problems because the claimants are submitting such evidence as driver licenses and voter registration cards for proof of age. These are not preferred, but rather secondary proofs. This situation causes follow-up visits or phone calls. The lack of clarification further exacerbates the situation when the claimant is filing out-of-state and does not have the preferred evidence readily available.

Suggestion

We spoke with the Office of Program Benefits and alerted them to this problem. We suggested the appointment notices be modified to read *"Original birth certificate, if available, or other proof of birth."* This language is already used for persons who are accessing the Internet Retirement Insurance Benefit application process. To be consistent, the same language should be used on the title II appointment notices as well.

[34] *POMS GN 00302.052 Preferred Evidence of Age*

Appendices

Appendix A

Payment Accuracy Task Force Steering Committee

Steven L. Schaeffer, Assistant Inspector General for Audit, Office of the Inspector General, Chairperson

Thomas Evans, Associate Commissioner, Office of Quality Assurance and Performance Assessment, Office of the Deputy Commissioner for Finance, Assessment and Management

Ernestine Durham, Director, Division of Operations Management, Office of Public Service and Operations Support, Office of the Deputy Commissioner for Operations

Steve Aprile, Director, Office of Workforce Analysis, Office of the Deputy Commissioner for Human Resources

Fritz Streckewald, Office of Program Benefits, Office of the Deputy Commissioner for Disability and Income Security Programs

Mark Nadel, Associate Commissioner, Office of Disability and Income Assistance Policy, Office of Policy

Vince Sanudo, Deputy Associate Commissioner, Office of Communications and Planning Technology, Office of the Deputy Commissioner for Communications

Pete Herrera, Associate Commissioner, Office of Systems Requirements, Office of the Deputy Commissioner for Systems

Virginia Baker, Social Insurance Specialist for Old-Age and Survivors Insurance Benefits, representing the Office of the Deputy Commissioner for Legislation and Congressional Affairs

Laraine Williams, Analyst, representing the Office of the Commissioner

Several of the Steering Committee members listed above were designated as representatives of their respective Associate Commissioners or their component's equivalent to the Associate Commissioner.

Appendix B

Fiscal Year 2000 Payment Accuracy Issue Team

- ***Office of the Inspector General/Office of Audit***

  Carolyn Neuwirth, Deputy Director
  Evan Buckingham, Senior Evaluator and Project Leader
  Janet Stein-Pezza, Program Analyst

- ***Deputy Commissioner for Operations/ Houston, Texas Field Office***

  Shirley Clack, Management Support Specialist

- ***Deputy Commissioner for Operations/ Gadsden, Alabama Field Office***

  Reggie Jenkins, Claims Representative

- ***Deputy Commissioner for Finance, Assessment and Management/Office of Quality Assurance and Performance Assessment***

  Naomi Keys, Social Insurance Specialist

- ***Deputy Commissioner for Disability and Income Support Programs/Office of Program Benefits Policy***

  Cynnie Mages, Policy Analyst

- ***Deputy Commissioner for Human Resources/Office of Workforce Analysis***

  Don Fuller, Management Analyst

Appendix C

Types of Title II Relationship / Dependency Deficiencies

Valid Ceremonial Marriage
Deemed Marriage
Common-Law Marriage
Duration of Marriage Requirement
10/20 Year Requirement for Divorced Spouses
Other Marriage Requirement
Beneficiary Divorced from Number Holder
Beneficiary Married

Other Relationship Requirements

Natural, Adoptive, or Step-parent Relationship
Natural, Legitimate Child Relationship
Illegitimate Child with Inheritance Rights or 216(H)(3)
Legally Adopted Child
Step-child Relationship
Other Child Relationship Requirement

Support/Dependency/Child-in Care Requirements

One-half Support for Parent
Support Requirement for Child
Child-in-Care

School Attendance

Full-time Attendance
Educational Institution

Appendix D

Title II Relationship / Dependency-Related Initiatives

We found four initiatives SSA has in place to improve the accuracy of title II relationship and dependency payments. These include:

Beneficiary Recontact Report

The Beneficiary Recontact Program was initiated in 1993 to detect unreported terminating events. Before the program was implemented, SSA relied on voluntary reports from claimants regarding suspension and termination events.

Beneficiary recontact report forms are mailed annually to young widow/widowers to detect unreported marriages and no child in-care situations and to children ages 15 to17 in direct pay or with representative payees to detect unreported marriages.

Marriage and Divorce Computer Matching Pilot

The Office of Program Benefits (OPB) is working with the Office of the Inspector General and the Office of the Actuary on a pilot to match the marriage records of four States against SSA payment records to detect unreported marriages. The study will determine the suitability of the four States' records for electronic matching.

Student Workgroup

In 1998, an intercomponent workgroup was formed to improve the student enforcement process. The workgroup was formed in response to an Office of Quality Assurance and Performance Assessment (OQA) report that revealed student benefits have the lowest net accuracy rate of any of the post-entitlement workloads.[1] OQA concluded the low accuracy rate for student benefits resulted from the complexity of the program and recommended elimination of most of the reporting process that follows initial entitlement. In June 2000, *Program*

[1] *Office of Program and Integrity Reviews Evaluation of Post-entitlement (PE) Changes*, September 12, 1994.

Operations Manual Systems (*POMS*) procedures were issued that require a personal contact with the student before the adjudication of the *Form SSA-1372-F4* (Student's Statement Regarding School Attendance).[2]

In addition, SSA plans to revise the student enforcement process to make it more efficient. The revised process requires a new version of *Form SSA-1387* (Advance Notice of Termination of Child's Benefits) be mailed to the representative payee 3 months before the child's eighteenth birthday. Simultaneously, a revised *Form SSA-1372* will be sent to the student for completion and school certification. The school maintains a tear-off portion of the form and uses it to notify SSA of any changes in attendance. Before processing *Form SSA-1372* and awarding benefits, SSA will inform the student of his/her reporting responsibilities. This new process is estimated by OQA to save 150 work years by eliminating a back-end verification process that was established when SSA paid college students. It also puts more emphasis on verifying school attendance before awarding benefits.

POMS on Policy Net

The Office of Policy and Technology (OPMT) is placing *POMS* on *Policy Net*. Users will have one central data base with access not only to *POMS* but also all Regional and Program Service Center supplements and Court decisions. Also, since *Policy Net* is accessed through the Internet, *POMS* can be updated instantly. This virtual process eliminates the lag time usually involved in updates. Currently, Office of Policy and Technology is conducting a pilot in 10 field offices to obtain user feedback.

[2] *POMS RS 00205 TN13 -- Student Benefits, effective date 6-28-2000.*

APPENDIX E

Title II Relationship / Dependency Payment Deficiency Dollars

Fiscal Year 1997 Index of Dollar Accuracy Cases

Type of Deficiency	*Retro $*	*Current $*	*Future $**	*Case Weight*	*Weighted Total $*
0530		(u) 227	34,050	31.4	1,076,786
0530	(o) 20	(o) 307	46,050	768.6	35,646,179
0530	(u) 6,310	(u) 1,235	185,250	32.8	6,323,676
0535	(u) 1,635	(u) 230	34,500	27.6	1,003,674
0715	(o) 1,960			761.9	1,493,324
0720	(u) 298			17.2	5,126
0720	(u) 4,101	(u) 641	96,150	31.5	3,178,097
0720	(u) 696	(u) 174		31.5	27,405
0720	(u) 1,544	(u) 472	70,800	29.1	2,118,945
0720	(u) 1,122	(u) 561		27.7	46,619
Totals	**$17,686**	**$3,847**	**$466,800**	**1,759.3**	**$50,919,831**

Code 0530 – 10/20 year requirement for divorced spouse
Code 0535 – Other Marriage Requirement
Code 0715 – Natural Legitimate Child Relationship
Code 0720 – Illegitimate Child With Inheritance Rights or 216 (h) (3)
**Life Cycle = 150 months*
o = overpayment; u = underpayment;
Retro=Retroactive (Before the Current Operating Month) Overpayment

Note: Due to the small number of sample cases, it is difficult to make reliable projections of deficiency dollars for either Fiscal Year 1997 or Fiscal Year 1998. The sampling variability of any such projection would be very large.

APPENDIX E (continued)

Title II Relationship / Dependency Payment Deficiency Dollars

Fiscal Year 1998 Index of Dollar Accuracy Cases

Type of Deficiency	*Retro $*	*Current $*	*Future $**	*Case Weight*	*Weighted Total $*
0520	(o) 233	(o)233	34,950	917.8	32,504,804
0530		(u)491	73,650	10.0	741,410
0530	(u) 2,871	(u)531	79,650	30.0	2,491,560
0535	(u) 250	(u)125	18,750	30.0	573,750
0535	(u)437	(u)95	14,250	16.0	236,512
0620	(o)6,327			304.8	1,928,779
0720	(u)2,560	(u)285	42,750	172.0	7,842,340
0720	(o)3,118	(o)727	109,050	233.5	26,357,842
0720	(u)1,787	(u)553	23,779	16.0	236,512
0720	(u)171			117.1	20,017
0730	(u)2,292			112.5	257,931
	(u)2,274			112.5	255,906
0820		(o)782	117,300	107.9	12,741,745
1010	(u)1,304			124.6	162,478
1010	(o)2,028	(o)507		479.7	1,216,040
Totals	**$25,652**	**$4,329**	**$514,129**	**2,788.4**	**$87,853,494**

Code 0520 – Common-law Marriage
Code 0530 – 10/20 Year requirement for Divorced Spouse
Code 0535 – Other Marriage Requirement
Code 0620 – Beneficiary Married
Code 0720 – Illegitimate Child With Inheritance Rights or 216 (h) (3)
Code 0730 - Stepchild Relationship
Code 0820 - Support Requirement for Child
Code 1010 – Full-time Attendance
**Life Cycle = 150 months*

o = overpayment; u = underpayment
Retro=Retroactive (Prior to Current Month) Opmt

Title II Relationship / Dependency Payment Deficiency Dollars

Fiscal Year 1997 through Fiscal Year 1998 Stewardship Payment Deficiency Dollars

Year	Deficiency Type	Deficiency Dollars Unweighted	Weighted Deficiency Dollars
1997	0620	(o) $93	$21,188,996
1997	1010	(o) $525	$143,510,017
1998	1010	(o) $500	$9,044,118
		Totals	$173,743,131

Code 0620 – Marriage/Termination
Code 1010 – Student – Full-Time Attendance
o - overpayment

APPENDIX F

Recovery of Overpayment Accounting and Reporting System Data Extract Summary

We used overpayment data from the Recovery of Overpayments Accounting and Report system based on certain types of events codes related to title II relationship/dependency. We reviewed more than 200 cases as listed below.

Type of Termination	*# of Cases*	*% of Cases*	*Overpayment Amount*	*% of Total Overpayment Amount*
Student	111	50%	$102,481.44	35%
Marriage	47	21%	$71,504.50	24%
No Child in-care	32	14%	$55,334.70	19%
Divorce	18	8%	$29,092.50	10%
Other	15	7%	$35,436.10	12%
TOTAL	***223***	***100%***	***$293,849.24***	***100%***

- Overpayments from students included terminations for the following reasons:
  - Student not in full-time attendance
  - Student did not return *Form SSA-1388*
  - Student turned age 19
  - Student turned 18 and payments were not terminated properly or timely.

- Terminations for Divorce include both benefits for a stepchild and a spouse.

- Terminations for Marriage include marriages by both those individuals receiving mother's/father's benefits and child beneficiaries.

- Terminations for No Child in-care includes both cases where the child left the beneficiaries' care and it was not reported and cases where the last child turned 16 and the system did not automatically terminate the benefits due to multiple household involvement.

- Overpayments listed under "Other" included cases where an adverse adjustment occurred, disability cessations, and other cases where we were unable to determine the cause.

The overwhelming majority of these overpayments resulted from a failure on the part of the beneficiary to report changes that affected entitlement status. A few cases were noted where the system failed to properly and timely terminate certain benefits. These cases were typically complex where more than one household is involved.

Appendix G

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Appendix H

Modernized Claims System Title II Relationship / Dependency Screens

The Modernized Claims System (MCS) is used to obtain information from the claimant filing for title II benefits during the initial claims and appeals processes. An input screen is an interactive screen that asks for information. An interactive screen is a display on a terminal that asks the claimant for information and gives the interviewer information.

The specific screens that capture relationship and dependency issues are the *CHD1*, *CHD2*, *DEPC*, *DCIC*, *NMAR*, and *CMAR*. Specific information for each screen can be found in the *Modernized Systems Operations Manual*, chapters 15, 16 and 17.

Child's Identification 1 (CHD1) is one of two screens that records basic information about each child filing on the numberholder's (NH) Social Security number (SSN). The "Child Relationship" field on this screen requires an entry of a code for the alleged type of child claimant as well as questions regarding disability and student status. This screen also has a "Date Dependency Met" field that is required in certain child claims.

Child's Identification 2 (CHD2) is the second of two screens that records basic information about each child filing on the NH's SSN. This screen contains questions about the date the child's relationship is established and records the dates the child lived with the number holder.

Dependent Children of NH (DEPC) screen requires the interviewer to list all children of the NH who are under age 18, ages 18 to 19 and attending secondary school, and disabled children 18 or older and disability began before age 22.

Dependent Children-in-Care (DCIC) screen lists the names of the NH's dependent children that a spouse has in his/her care. This is a mandatory screen for a spouse or surviving spouse with child-in-care claims. This screen shows the months each child was in the care of the spouse.

NH Marriage (NMAR) screen is used to record information about a number holder's marriages. A NMAR is completed for each marriage.

Claimant Marriage (CMAR) screen records information about a claimant's marriages. A CMAR is completed for each marriage.