Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

The Social Security Administration's Compliance with the Payment Integrity Information Act of 2019 in Fiscal Year 2024

152415 May 2025

Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: May 21, 2025 **Refer to:** 152415

To: Frank Bisignano
Commissioner

From: Michelle L. Anderson
Assistant Inspector General for Audit

Subject: The Social Security Administration's Compliance with the Payment Integrity Information Act of 2019 in Fiscal Year 2024

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration met all requirements of the *Payment Integrity Information Act of 2019* in the Fiscal Year 2024 Agency Financial Report and accompanying materials.

Please provide within 60 days a corrective action plan that addresses each recommendation. If you wish to discuss the final report, please call me or have your staff contact Jeffrey Brown, Deputy Assistant Inspector General for Audit.

Attachment

The Social Security Administration's Compliance with the Payment Integrity Information Act of 2019 in Fiscal Year 2024
152415

May 2025 **Office of Audit Report Summary**

Objective

To determine whether the Social Security Administration (SSA) met all requirements of the *Payment Integrity Information Act of 2019* (PIIA) in the Fiscal Year (FY) 2024 Agency Financial Report and accompanying materials.

Background

On March 2, 2020, the President signed PIIA to improve efforts to identify and reduce Government-wide improper payments (IP). In March 2021, the Office of Management and Budget updated Government-wide guidance on implementing PIIA to require that agencies report specific IP information in their annual financial reports and accompanying materials. Further, the law and guidance require that Inspectors General review the IP information their respective agencies report in their agency financial reports and accompanying materials.

Results

In FY 2024, SSA complied with eight PIIA reporting requirements but did not comply with two PIIA reporting requirements for the Supplemental Security Income (SSI) program because it did not (1) demonstrate improvements in payment integrity or reach a tolerable IP and unknown payment (UP) rate and (2) did not report an IP and UP estimate of less than 10 percent.

According to SSA, the leading causes of overpayments in the SSI program are financial accounts, wages, and in-kind support and maintenance. In addition, the leading causes of overpayments in the Old-Age, Survivors, and Disability Insurance (OASDI) program are substantial gainful activity, relationship and dependency, and computations. While SSA has made progress implementing corrective actions for both programs, it still has work to do to address IPs.

Recommendations

We previously recommended SSA:

- Finalize the IP alignment strategy for OASDI computations overpayment deficiency dollars.
- Conduct a study to expand Access to Financial Institutions (AFI) searches between the SSI initial application and subsequent eligibility redeterminations.
- Complete the expansion study for AFI and assess the effectiveness of lowering the countable liquid resource tolerance to $0.

SSA has not implemented these recommendations.
We encourage SSA to continue working on the recommendations from our prior reports. We are also recommending that SSA:

1. Complete the foreign travel data exchange project.
2. Finalize the IP alignment strategy for relationship and dependency overpayment deficiency dollars.

SSA agreed with our recommendations.

TABLE OF CONTENTS

ABBREVIATIONS

AFI	Access to Financial Institutions
CCE	Consolidated Claims Experience
CDR	Continuing Disability Review
C.F.R.	Code of Federal Regulations
Fed. Reg.	Federal Register
FTD	Foreign Travel Data
FY	Fiscal Year
IP	Improper Payment
IPAS	Improper Payments Alignment Strategy
ISM	In-kind Support and Maintenance
OASDI	Old-Age, Survivors, and Disability Insurance
OIG	Office of the Inspector General
OMB	Office of Management and Budget
OQR	Office of Quality Review
PIIA	*Payment Integrity Information Act of 2019*
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SGA	Substantial Gainful Activity
SSA	Social Security Administration
SSI	Supplemental Security Income
UP	Unknown Payment
U.S.C.	United States Code
WEP	Windfall Elimination Provision

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) met all requirements of the *Payment Integrity Information Act of 2019* (PIIA) in the Fiscal Year (FY) 2024 Agency Financial Report and accompanying materials.

BACKGROUND

On March 2, 2020, the President signed PIIA to improve efforts to identify and reduce Government-wide improper payments (IP).[1] Under PIIA, Federal agencies must identify all programs and activities that may be susceptible to significant IPs. Once the agency identifies these programs and activities, it is required to report on actions it has taken, or plans to take, to recover IPs and prevent future IPs.[2] See Appendix A for Agency reporting requirements.

Inspectors General are required to review their respective agencies' IP and high-dollar overpayment reporting requirements. Our compliance review for FY 2024 used a combination of requirements in Office of Management and Budget (OMB) Circulars A-123, Appendix C, *Requirements for Payment Integrity Improvement*,[3] and A-136, *Financial Reporting Requirements*;[4] OMB Annual Data Call Instructions;[5] and the Council of the Inspectors General on Integrity and Efficiency's guidance required under PIIA.[6] Refer to Appendix B for Inspector General reporting responsibilities and Appendix C for our scope and methodology.

SSA's Office of Quality Review (OQR) conducts stewardship reviews to examine the non-medical elements in the Old-Age, Survivors, and Disability Insurance (OASDI) and Supplemental Security Income (SSI) programs.[7] The reviews determine the accuracy of benefit entitlement and eligibility decisions and payments made. Each month, OQR selects a statistically valid sample of beneficiaries who received one or more payments during the review period. An OQR employee interviews the selected beneficiary or their representative payee, makes necessary collateral contacts, and re-develops all non-medical factors of entitlement as of the sample month.

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[1] *Payment Integrity Information Act of 2019 (PIIA),* Pub. L. No. 116-117, 134 Stat. 113 (2020). PIIA revised the Government's IP reporting requirements by repealing and replacing the *Improper Payments Information Act of 2002*, *Improper Payments Elimination and Recovery Act of 2010*, *Improper Payments Elimination and Recovery Improvement Act of 2012,* and *Fraud Reduction and Data Analytics Act of 2015*.

[2] *Payment Integrity Information Act of 2019*, 31 U.S.C. § 3352(b)(2)(B)(i).

[3] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement*, *M-21-19* (2021).

[4] OMB, *Financial Reporting Requirements*, *Circular A-136 Revised* (2024).

[5] OMB annual data call instructions are posted to community.max.gov (restricted access).

[6] Council of the Inspectors General on Integrity and Efficiency, *Guidance for Payment Integrity Information Act OIG Compliance Reviews* (2024).

[7] The OASDI program provides benefits to wage earners and their families who meet certain criteria in the event the wage earner retires, becomes disabled, or dies. See 20 C.F.R. part 404. The SSI program provides payments to individuals with limited income and resources who are aged, blind, or disabled. See 20 C.F.R. § 416.110.

OMB approved SSA to use these reviews to produce a statistically valid estimate of SSA's IPs.[8] IP amounts SSA identifies through its stewardship reviews can fluctuate greatly from year to year. As we stated in our 2020 report, SSA should re-evaluate its use of the stewardship reviews to estimate IPs.[9]

SSA reports the results of its stewardship reviews, in part, in the payment integrity sections of its Agency Financial Report and accompanying materials.[10] In accordance with OMB guidelines, SSA reports IPs that result from (1) its mistake in computing the payment; (2) its failure to obtain, or act on, available information that affects the payment; (3) a beneficiary's failure to report an event; or (4) a beneficiary's incorrect report.[11] Some stewardship cases have more than one error that causes an incorrect payment. SSA calls each error a deficiency. Data SSA reported in its FY 2024 Agency Financial Report and accompanying materials were for cases OQR sampled in FY 2023. SSA will not have the FY 2024 data until late FY 2025.

In FY 2019, SSA established the Improper Payment Prevention Branch, formerly known as the Improper Payments Prevention Team, to address IPs. Since FY 2019, the Improper Payment Prevention Branch has developed nine Improper Payments Alignment Strategies (IPAS) to determine the underlying causes of payment errors, develop corrective action plans, and determine cost-effective actions.[12]

RESULTS OF REVIEW

In FY 2024, SSA complied with 8 of the 10 PIIA reporting requirements. For the SSI program, SSA did not (1) demonstrate improvements to payment integrity or reach a tolerable IP and unknown payment (UP)[13] rate and (2) did not report an IP and UP estimate of less than 10 percent (see Table 1).

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[8] SSA, OIG, *The Social Security Administration's Compliance with the Improper Payments Elimination and Recovery Act of 2010 in the Fiscal Year 2011 Performance and Accountability Report*, *A-15-12-11244*, pp. 7 and 8 (March 2012).

[9] SSA, OIG, *The Social Security Administration's Compliance with the Improper Payments Elimination and Recovery Improvement Act of 2012 in the Fiscal Year 2019 Agency Financial Report*, *A-15-19-50842*, p. 14 (May 2020).

[10] SSA, *Agency Financial Report Fiscal Year 2024: Payment Integrity*, pp. 189 through 191 (November 2024).

[11] SSA, *Agency Financial Report Fiscal Year 2024: Payment Integrity*, p. 190 (November 2024).

[12] SSA has published nine IPAS: (1) Substantial Gainful Activity (SGA), (2) Financial Accounts, (3) SSI Wages, (4) Non-home Real Property, (5) Absence from the United States, (6) Medical Cessation processing, (7) Improving Death Data Processing, (8) Government Pension Offset and Windfall Elimination Provision, and (9) In-kind Support and Maintenance (ISM). The IPAS are living documents that SSA updates continually. The IPAS for SGA, Financial Accounts, SSI Wages and ISM were active as of February 2025. SSA retired the remaining IPAS at the end of 2023 or during FY 2024.

[13] According to OMB, if a program cannot discern whether a payment is proper or improper, the payment is considered an unknown payment. OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, part I, sec. (B), p. 12 (2021).

Table 1: SSA PIIA Compliance Reporting[14]

Requirement	OASDI	SSI
Published payment integrity information with the annual financial statement	Compliant	Compliant
Posted the annual financial statement and accompanying materials on the Agency website	Compliant	Compliant
Conducted IP risk assessment for each program with annual outlays greater than $10 million at least once in the last 3 years	Compliant	Compliant
Adequately concluded whether the program is likely to make IPs and UPs above or below the statutory threshold	Compliant	Compliant
Published IP and UP estimates for programs susceptible to significant IPs in the accompanying materials to the annual financial statement	Compliant	Compliant
Published corrective action plans for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement	Compliant	Compliant
Published IP and UP reduction target for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement	Compliant	Compliant
Has demonstrated improvements to payment integrity or reached a tolerable IP and UP rate	Compliant	**Noncompliant**
Has developed a plan to meet the IP and UP reduction target	Compliant	Compliant
Reported an IP and UP estimate of less than 10 percent for each program for which an estimate was published in the accompanying materials to the annual financial statement	Compliant	**Noncompliant**

SSA also timely submitted the OMB-required information used to populate the FY 2024 quarterly Payment Integrity Scorecards, which fulfills the high-dollar overpayment reporting requirements.[15] In addition, SSA completely and accurately provided supporting documentation for material facts and figures presented in its FY 2024 Agency Financial Report and accompanying information.

[14] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, part VI, sec. (C)(5), p. 52 (2021).

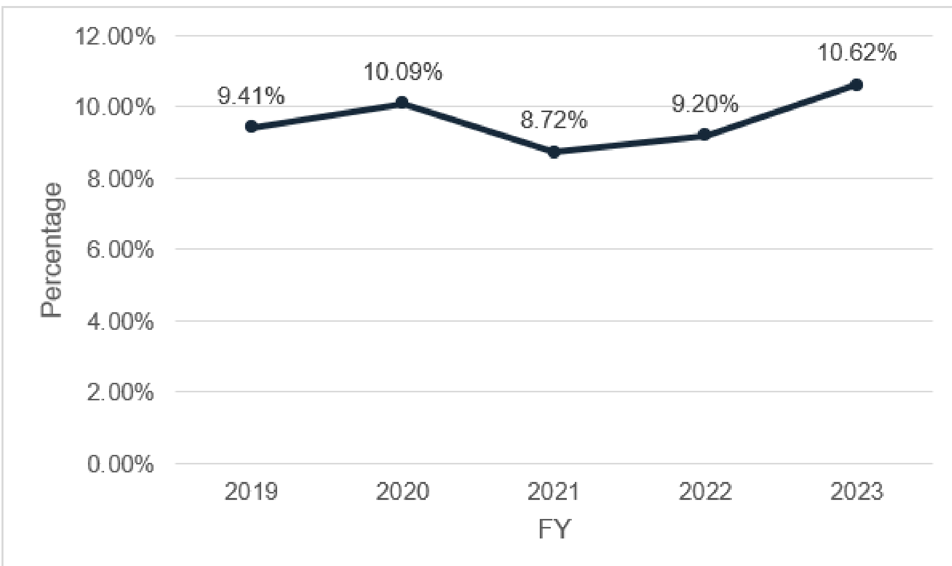
[15] Payment Integrity Scorecards describe root causes of IPs and planned mitigation actions and track the status of a program's accomplishments. *Payment Accuracy,* paymentaccuracy.gov (last visited on March 6, 2025).

Compliance Reporting for Improvements to Payment Integrity and Tolerable Rates

PIIA requires that agencies have demonstrated improvements to payment integrity or reached a tolerable IP and UP rate.[16] We concluded, for FY 2024, SSA was non-compliant because it did not demonstrate improvements to payment integrity, as the IP and UP rates for the SSI program increased from FYs 2022 to 2023.

PIIA was developed, "To improve efforts to identify and reduce government-wide [IPs]."[17] In addition, OMB guidance states, "This Administration will continue to make payment integrity a top priority, focusing on reducing improper payments and protecting taxpayer money a top priority."[18] While SSA has initiatives and corrective action plans to reduce IPs, it has not significantly improved SSI IP and UP rates since FY 2019.[19] As shown in Figure 1, after the SSI IP and UP rate dropped in FY 2021, it increased in FYs 2022 and 2023. In addition, since FY 2019, the SSI IP and UP rate has increased from 9.41 percent (approximately $5.32 billion) to 10.62 percent (approximately $6.48 billion).[20]

Figure 1: SSI IP and UP Rates (FYs 2019 Through 2023)



[16] The IP and UP rates are defined as "the degree of IPs and UPs measured against the outlays." OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, p. 64 (2021).

[17] *Payment Integrity Information Act of 2019 (PIIA),* Pub. L. No. 116-117, 134 Stat. 113 (2020).

[18] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement*, *M-21-19* (2021).

[19] Refer to Appendix D for SSA's initiatives.

[20] The total outlays used in the calculation for SSI IPs were approximately $57 billion in FY 2019 and approximately $61 billion in FY 2023.

A tolerable IP and UP rate is determined by agency senior management and is defined as ". . . the [IP] and [UP] estimate achieved with a balance of payment integrity risk and [processes to mitigate that risk]." Tolerable rates often include IPs that are unavoidable and beyond the agency's ability to reduce as well as IPs and UPs that are cost- or, sometimes, mission-prohibitive for the agency to prevent.[21]

SSA established the methodology for determining tolerable rates in July and October 2023 for SSI and OASDI, respectively. According to SSA, "The tolerable rate is the 5-year average of historical performance data of [IPs] outside of agency control, and therefore the tolerable rate is subject to change year to year." For FY 2024 PIIA compliance reporting, neither program met SSA's established tolerable rates. Regarding the OASDI and SSI programs not reaching SSA's tolerable rates, SSA stated:

> To a great extent, many of SSA's improper payments stem from the inherent nature of the programs and our reliance on self-reporting of beneficiaries, recipients, and their representative payees. The OASDI and SSI tolerable rates account for these types of improper payment causes as they are based on 5-year averages of overpayments and underpayments outside of agency control only. The tolerable rates do not, however, account for improper payments within our control. For the portion of improper payments within our control that would be cost or mission prohibitive to mitigate, we provided guidance to components on how they should, on a case-by-case basis, evaluate whether potential payment integrity initiatives should be pursued, consistent with the tolerable rate framework. Because the tolerable rate only consists of improper payments outside of agency control, the improper payment rate will be greater than the tolerable rate. Despite establishing a tolerable rate, we continue to pursue cost-effective initiatives that have the potential to reduce: the improper payment rates; the complexity of the programs; and/or our reliance on self-reporting.

Overpayments Caused by Financial Accounts

A leading cause of overpayments in the SSI program is resources above allowable amounts that recipients have in financial accounts.[22] To address this, in June 2011, SSA implemented the Access to Financial Institutions (AFI) program. AFI verifies alleged bank account balances with financial institutions and searches for undisclosed accounts at geographically relevant locations based on the individual's address. SSA uses AFI when it processes initial SSI applications and periodic eligibility redeterminations.[23] Between FYs 2019 and 2023, overpayments related to financial accounts averaged approximately $1.7 billion, as shown in Figure 2.

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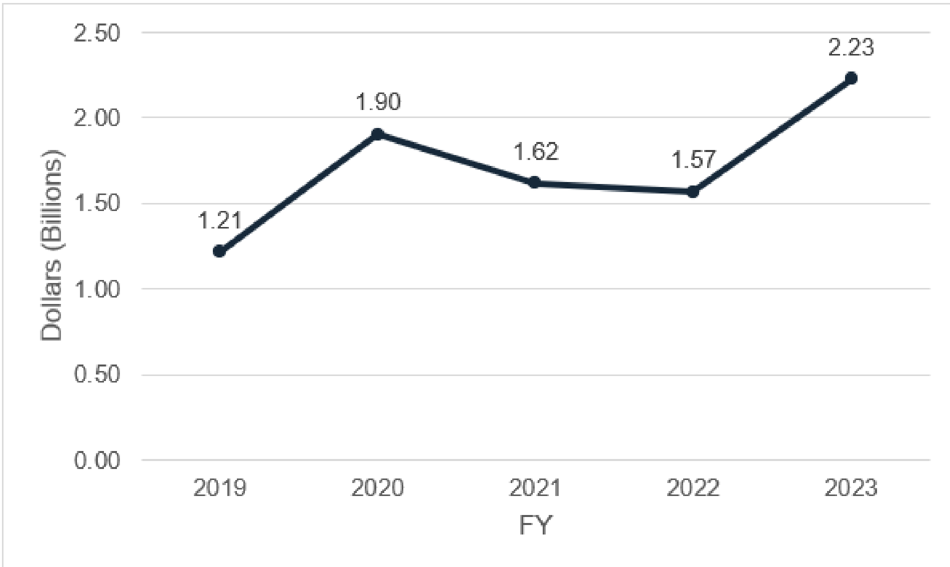
[21] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, p. 74 (2021).

[22] SSA, *Agency Financial Report Fiscal Year 2024: Payment Integrity*, p. 199 (November 2024).

[23] A redetermination reviews a recipient's non-medical eligibility factors (income, resources, and living arrangements) to determine whether the recipient is still eligible for, and receiving, the correct SSI payment. SSA, *POMS*, SI 02305.001, A (September 5, 2019).

Figure 2: SSI Financial Accounts Overpayment Deficiency Dollars (FYs 2019 Through 2023)[24]



SSA provided the following response regarding the increase in overpayments, based on OQR's stewardship review sample, from FYs 2022 to 2023.

> Recipients and their representative payees are required to notify us when a change occurs that affects their SSI eligibility and payment amount, such as resources that exceed allowable amounts. Failure to report these payment-affecting changes continues to be the primary cause of overpayment errors. Tools such as the [AFI] are effective to identify errors, but the SSI program continues to rely heavily on recipients to report changes timely to prevent errors. The [SSI] stewardship review does not capture data to conduct analysis of national economic factors that could impact SSI improper payments, so we do not have an explanation for the increase in overpayment deficiency dollars related to financial accounts from 2022-2023.

An IP initiative should have reduced these financial account deficiencies. SSA last updated the AFI program in January 2016 when it added a search feature to identify financial institutions by routing number.[25] During our 2019 review, SSA indicated it was exploring an expansion study that could reduce the AFI tolerance of countable liquid resources from $400 to $0. In our FY 2021 review, we recommended SSA complete the expansion study.

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[24] OQR provided the deficiency dollar amounts. We did not independently verify these data. SSA stated, "The size of the stewardship sample provides statistically reliable data on the overall payment accuracy of SSI payments issued in a specific fiscal year; however, the annual sample is not large enough to provide statistically reliable information about deficiencies for a given year. We summarize deficiency data over a rolling 5-year period."

[25] The routing number identifies the financial institution responsible for the payment.

In January 2025, SSA stated:

> In April 2023, the [AFI] study was put on an indefinite hold due to major competing priorities, resources, and service issues. We determined it was not feasible to do the study in fiscal year 2024 due to the operational effects of our resource and service crisis. We will evaluate the situation annually to determine the appropriate time to resume the study. The next evaluation will be in the third quarter of FY 2025.

In a September 2024 audit, we determined SSA's SSI financial account validation process, AFI, for applicants and recipients who alleged having less than $400 in financial accounts did not always lead to accurate SSI determinations. We recommended SSA lower its $400 resource-level tolerance for AFI application use to $0. SSA disagreed with the recommendation, stating:[26]

> Originally, we planned to conduct that study in FY 2023; however, resource constraints and competing priorities did not allow us to complete that study on time. We believe a study is necessary to understand the administrative costs and program impacts before adjusting the AFI tolerance to $0. Therefore, we reassert our commitment to conduct the study in FY 2025.

Several of our previous PIIA audits determined the Agency could have realized additional savings had it used AFI more often than at the initial SSI application and during periodic redeterminations. In December 2014, we reported SSA would not realize AFI's full potential to identify and prevent IPs until it used AFI for all cases.[27] We recommended SSA determine whether systems enhancements were feasible for the program. According to SSA, 89 percent of financial account overpayments occurred because of changes after the initial claim and redeterminations.[28] We estimated SSA could have prevented approximately $2 billion in overpayments caused by excess financial account balances in FY 2023 had it performed AFI searches between the initial application and redeterminations.[29] In May 2023, we recommended SSA conduct a study to expand AFI searches between the SSI initial application and subsequent eligibility redeterminations.[30] In January 2025, SSA provided an update to our recommendation and stated, "We are continuing our data exploration and analysis, and we expect that work to continue through the end of [FY] 2025. We are refining the methodology to find the optimal frequency for AFI inquiries by seeking input from subject matter experts."

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[26] SSA, OIG, *Supplemental Security Income Recipients Who Under-report Financial Account Balances, A-02-21-51028*, Appendix C (September 2024).

[27] SSA, OIG, *The Social Security Administration's Access to Financial Institutions Program, Limited Distribution, A-01-13-13069*, p. 3 (December 2014).

[28] We calculated this percentage using information from SSA's *Fiscal Year 2023 Title XVI Payment Accuracy Report*, p. 10 (June 2024).

[29] We calculated this estimate using information from SSA's *Fiscal Year 2023 Title XVI Payment Accuracy Report*, p. 10 (June 2024).

[30] SSA, OIG, *Compliance with the Payment Integrity Information Act of 2019 in the Fiscal Year 2022, A-15-22-51183,* p. 12 (May 2023).

As of the date of this report, SSA had not implemented our prior recommendations related to overpayments caused by financial accounts. As in prior years, we maintain SSA needs to implement new, or expand existing, corrective actions to address IPs related to resources recipients have in financial accounts that exceed allowable amounts. SSA should continue exploring the liquid resource tolerance reduction from $400 to $0 as well as reducing the barriers to using AFI between initial claims and redeterminations.

Overpayments Caused by Earnings

According to SSA, wage discrepancies are a leading cause of IPs in the SSI program.[31] Wage discrepancies occur when a recipient or their deemor[32] has actual wages that differ from those SSA used to calculate the SSI payment. SSA has developed three wage reporting systems to mitigate IPs based on wage discrepancies.

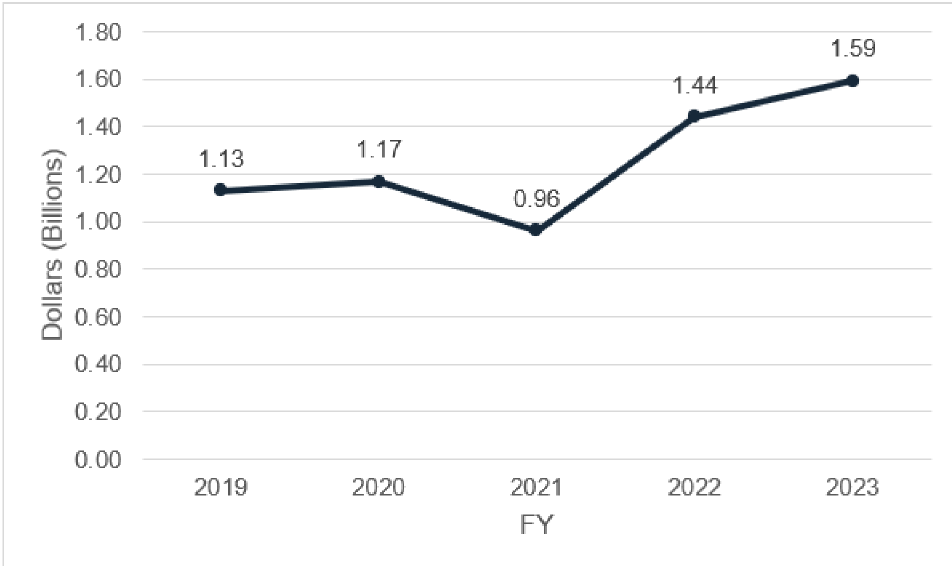
1. In FY 2008, SSA implemented the SSI Telephone Wage Reporting System.
2. In August 2013, SSA implemented SSI Mobile Wage Reporting.
3. In June 2018, SSA implemented online wage reporting for SSI recipients.

Overpayments related to wages increased in FYs 2022 and 2023, and averaged $1.3 billion from FYs 2019 to 2023, as shown in Figure 3.

[31] SSA, *Agency Financial Report Fiscal Year 2024: Payment Integrity*, p. 200 (November 2024).

[32] A deemor is an individual, such as an SSI recipient's ineligible spouse or parent, whose income and resources SSA considers when it determines a recipient's SSI eligibility or payment amount. SSA, *POMS*, SI 01310.127 (September 25, 2024).

Figure 3: SSI Wages Overpayment Deficiency Dollars (FYs 2019 Through 2023)[33]



SSA provided the following response regarding the increase in overpayments, based on OQR's stewardship review sample, from FYs 2022 to 2023.

> Recipients and their representative payees are required to notify us when a change occurs that affects their SSI eligibility and payment amount, such as wages. Failure to report these payment-affecting changes continues to be the primary cause of overpayment errors. The [SSI] stewardship review does not capture data to conduct analysis of national economic factors that could impact SSI improper payments, so we do not have an explanation for the increase in overpayment deficiency dollars related to wages from 2022-2023.

In addition, overpayments attributed to disabled beneficiaries who had engaged in SGA was a leading cause of IPs in the OASDI program. As shown in Figure 4, SGA overpayments fluctuated from FYs 2019 through 2023.

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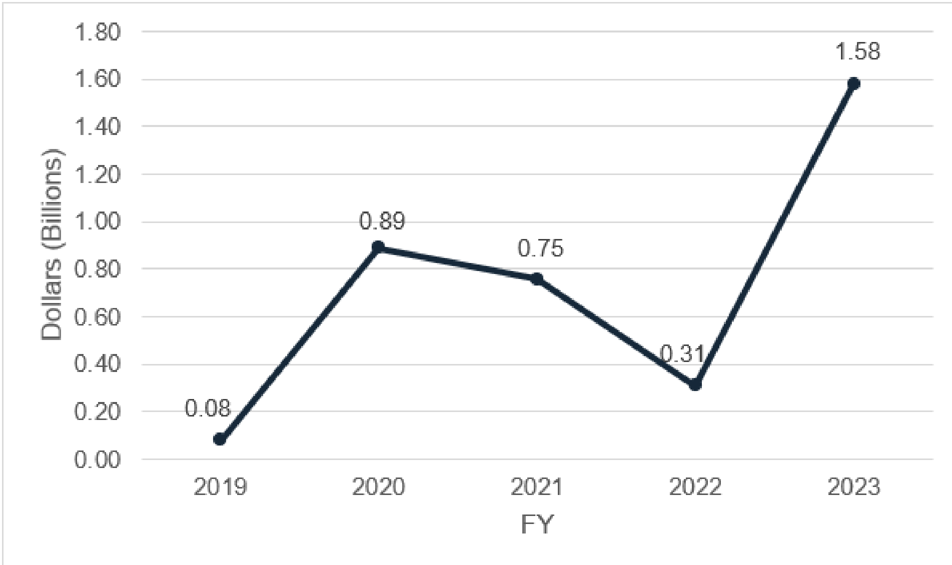
[33] See Footnote 24.

Figure 4: OASDI SGA Overpayment Deficiency Dollars (FYs 2019 Through 2023)[34]



SSA provided the following explanation for the increase in overpayments, based on OQR's stewardship review sample, from FYs 2022 to 2023.

> The difference in deficiency dollars is because in FY [20]22 there were 4 individual cases and in FY [20]23 there were 14 individual cases. SGA deficiencies are usually [overpayments] for the full month benefits. Depending on the amount of an individual's benefit, the OP amount can be lower or higher.

In FY 2019, SSA awarded a contract to build an information exchange to obtain monthly earnings data from third-party payroll data providers. SSA completed its first data exchange in August 2021. In December 2024, SSA published the final rule in the Federal Register for using electronic payroll data to improve program administration.[35] Although SSA implemented the commercial payroll information exchange on April 7, 2025, it will take several years from implementation for SSA to determine whether it effectively reduces IPs that are caused by wage and SGA reporting deficiencies. Because SSA has not substantially reduced overpayments due to wages and SGA, it should continue its efforts to implement other corrective actions to reduce these errors, as soon as possible.

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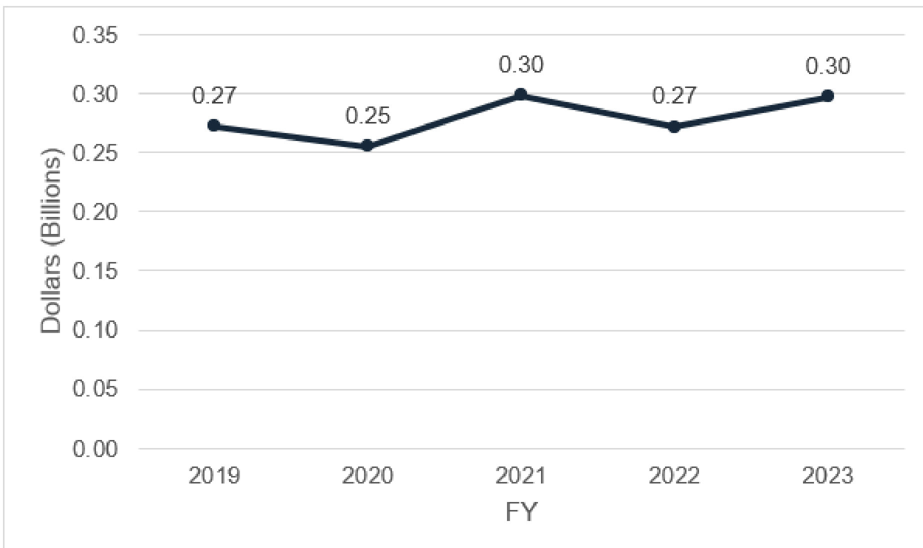
[34] OQR provided the deficiency dollar amounts. We did not independently verify these data. SSA stated, "The size of the stewardship sample provides statistically reliable data on the overall payment accuracy of OASDI payments issued in a specific fiscal year; however, the annual sample is not large enough to provide statistically reliable information about deficiencies for a given year. We summarize deficiency data over a rolling 5-year period."

[35] *Use of Electronic Payroll Data to Improve Program Administration,* 89 Fed. Reg. 107236 (December 31, 2024).

Overpayments Caused by In-kind Support and Maintenance

According to SSA, ISM discrepancies are a leading cause of IPs in the SSI program.[36] SSI recipients can receive ISM in the form of food, shelter, or both from family, friends, or other third-party sources. An SSI recipient's payment may be reduced for any ISM received for shelter unless they are paying their share of expenses. SSA includes a tolerance that prevents it from assessing ISM if a recipient is within a specific dollar amount of meeting their share of expenses. In October 2021, SSA increased the tolerance from $5 to $20.[37] SSI recipients and their representative payees are required to notify SSA when household expenses, including ISM, change. Figure 5 shows the ISM overpayment deficiency dollars in FYs 2019 through 2023.

Figure 5: SSI ISM Overpayment Deficiency Dollars (FYs 2019 Through 2023)[38]



[36] SSA, *Agency Financial Report Fiscal Year 2024: Payment Integrity*, p. 202 (November 2024).

[37] SSA, *POMS,* SI 00835.160, C.2. (September 29, 2023).

[38] See Footnote 24.

SSA provided the following response regarding the increase in overpayments, based on OQR's stewardship review sample, from FYs 2022 to 2023.

> Recipients and their representative payees are required to notify us when a change occurs that affects their SSI eligibility and payment amount, such as changes in living arrangements. Failure to report these payment-affecting changes continues to be the primary cause of overpayment errors. There are no tools to identify living arrangement errors, and the SSI program continues to rely heavily on recipients to report changes timely to prevent errors. The [SSI] stewardship review does not capture data to conduct analysis of national economic factors that could impact SSI improper payments, so we do not have an explanation for the increase in overpayment deficiency dollars related to in-kind support and maintenance from 2022-2023.

To address issues related to ISM, SSA issued three final rules that became effective on September 30, 2024.

1. The Agency no longer counts the value of food given to SSI recipients as ISM, which the Agency anticipates will lead to fewer benefit recalculations and, thus, fewer [IPs].[39]

2. The Agency updated how it determines the amount of rental subsidy/ISM when there is a parental-child relationship between the landlord or the landlord's spouse and the recipient.[40]

3. The Agency expanded the definition of a public assistance household to include the Supplemental Nutrition Assistance Program as an additional means-tested public income-maintenance program and to include households in which any other (as opposed to every other) household member receives public assistance.[41]

It will take several years from implementation for SSA to determine whether these new rules effectively reduce IPs caused by ISM discrepancies. We encourage SSA to continue developing and identifying regulations that would reduce ISM IPs.

Overpayments Caused by Relationship and Dependency

In FY 2024, SSA reported that one of the leading causes of overpayments in the OASDI program was relationship and dependency. Marital standing and child relationship factors are material when determining entitlement to certain benefits, and errors occur when a beneficiary does not report a marriage, divorce, or remarriage timely.[42] Figure 6 shows the relationship and dependency overpayment deficiency dollars for FYs 2019 through 2023.

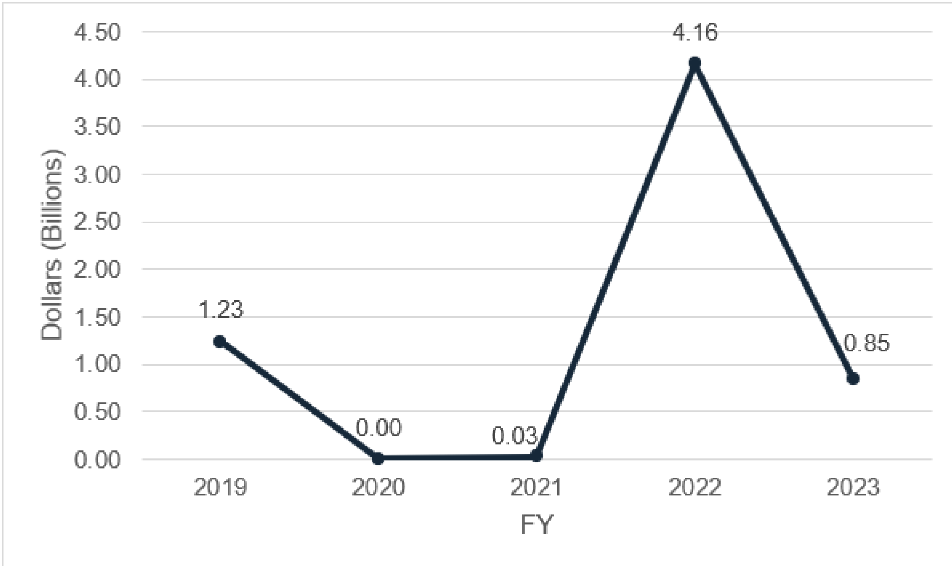
[39] *Omitting Food from In-Kind Support and Maintenance Calculations*, 89 Fed. Reg. 21199 (March 27, 2024).

[40] *Expansion of the Rental Subsidy Policy for Supplemental Security Income (SSI) Applicants and Recipients*, 89 Fed. Reg. 25507 (April 11, 2024).

[41] *Expand the Definition of a Public Assistance Household*, 89 Fed. Reg. 28608 (April 19, 2024).

[42] SSA, *Agency Financial Report Fiscal Year 2024: Payment Integrity*, p. 193 (November 2024).

Figure 6: OASDI Relationship and Dependency Overpayment Deficiency Dollars (FYs 2019 Through 2023)[43]



SSA provided the following explanation for why the relationship and dependency deficiency dollars decreased, based on OQR's stewardship review sample, from FYs 2022 to 2023.

> In general, we have reported a small number of relationship and dependency deficiencies in [OASDI] Stewardship. We discovered significant high dollar deficiencies throughout the FY [20]22 reporting period, which caused the top OP category to shift. These deficiencies, when weighted, represent both high projected dollar deficiencies and significant weighted case counts. We identified two deficiencies in this category in FY [20]22, one of which had a projected dollar deficiency of $4,110 million. In FY23, we identified three deficiencies but the highest deficiency represented about $467.5 million in projected dollar deficiencies. The projected dollar deficiencies for the remaining two deficiencies represented $382 million.

We asked SSA if there were any initiatives in progress to reduce relationship and dependency IPs. SSA provided the following response.

> We are in the beginning stages of developing our Improper Payment Alignment Strategy for Relationship and Dependency. [The Office of Financial Policy and Program Integrity] will use this process to obtain [A]gency-wide engagement and agreement on actions needed to remedy improper payment issues. Through the IPAS process, we will collaboratively identify or develop corrective actions with key stakeholders and determine the most cost-effective actions.

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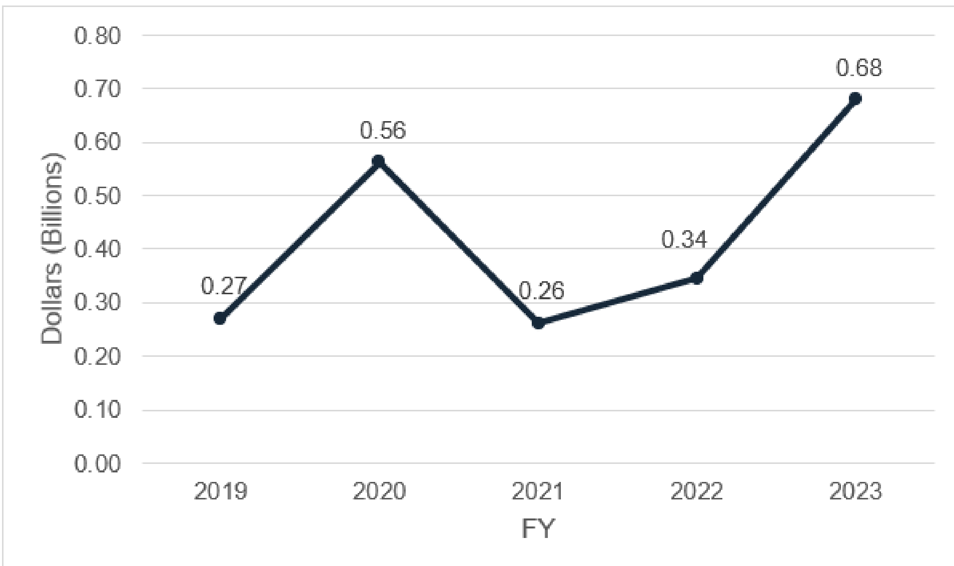
[43] See Footnote 34.

As relationship and dependency continues to be a leading cause of OASDI IPs, we recommend SSA finalize the IPAS for relationship and dependency overpayment deficiency dollars.

Overpayments Caused by Computations

In FY 2024, SSA reported that one of the leading causes of overpayments in the OASDI program was computations. Inaccurate information or administrative mistakes can cause errors in benefit calculations.[44] Overpayments related to computations fluctuated from FYs 2019 to 2023, as shown in Figure 7.

Figure 7: OASDI Computations Overpayment Deficiency Dollars (FYs 2019 Through 2023)[45]



When we asked why the computations deficiency dollars increased, based on OQR's stewardship review sample, from FYs 2022 to 2023, SSA stated "computations deficiencies fluctuate depending on the issue and the amount of an individual benefit."

[44] SSA, *Agency Financial Report Fiscal Year 2024: Payment Integrity*, p. 194 (November 2024).

[45] See Footnote 34.

For FYs 2019 to 2023, SSA determined the three leading causes of computations deficiencies that resulted in overpayments were (1) the windfall elimination provision (WEP),[46] (2) primary insurance amount computations, and (3) multi-entitlement computations.[47] During this period, WEP accounted for approximately $998 million (47 percent) of the computation overpayments for the OASDI program. WEP eliminated "windfall" Social Security benefits for retired and disabled workers who received non-covered pensions. Under WEP, SSA used a modified formula to determine a wage earner's monthly Social Security benefit.[48] In January 2025, the *Social Security Fairness Act of 2023* was signed into law repealing WEP, which increased monthly benefits for millions of beneficiaries previously affected by WEP.[49] According to SSA,

> The [*Social Security Fairness Act of 2023]* requires us to adjust benefits for over 2.8 million beneficiaries. Given that the law's effective date is January 2024, the month when WEP and GPO no longer applies, we will have to adjust these beneficiaries' past benefits as well as their future benefits, compounding the complexity and scope of implementation. Starting in February 2025, we began to pay retroactive benefits and increased monthly benefit payments to affected beneficiaries. We have been able to expedite payments using automation. For the many complex cases that cannot be processed automatically, additional time is required to manually update the records and pay both past due benefits and the new benefit amount. We anticipate that all beneficiary records will be updated by early November 2025.

In future PIIA reporting periods, we anticipate a decrease in overpayment computation errors caused by WEP because WEP was repealed in FY 2025.

Federal Employees' Compensation Act payments to eligible Federal employees can also offset OASDI benefits. In December 2023, SSA established a memorandum of understanding with the Department of Labor to obtain *Federal Employees' Compensation Act* data. SSA stated it is on track to execute the exchange in FY 2025.

In a prior report, we recommended SSA finalize the IP alignment strategy for OASDI computation overpayment deficiency dollars.[50] As of April 2025, the Agency anticipated it will complete this by September 30, 2025. SSA should continue finalizing the computations IPAS that will identify initiatives to reduce IPs and determine whether its existing initiatives are effective in reducing IPs in the OASDI program.

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[46] WEP can affect how SSA calculates a retirement or disability benefit. If a beneficiary works for an employer that does not withhold Social Security taxes from their salary, any pension they get from that employer can reduce Social Security benefits. SSA, *Windfall Elimination Provision, Publication No. 05-10045* (2025). The *Social Security Fairness Act of 2023*, Pub. L. No. 118-273, 138 Stat. 3232 (2025), repealed WEP.

[47] SSA, *Fiscal Year 2023 Title II Payment Accuracy Report*, p. 10 (July 2024).

[48] SSA, *POMS*, RS 00605.360 (February 29, 2024).

[49] *Social Security Fairness Act of 2023,* Pub. L. No. 118-273, 138 Stat. 3232 (2025).

[50] SSA, OIG, *The Social Security Administration's Compliance with the Payment Integrity Information Act of 2019 in Fiscal Year 2023, 152309,* p. 15 (May 2024).

Overpayments Caused by Absence from the United States

SSI recipients are generally ineligible for payments once they are absent from the United States for 30 consecutive days.[51] SSA stated,

> For the 5-year period of [FY] 2019 through FY 2023, absence from the U.S. attributed to an annual average of $110 million in overpayments in the SSI program. To reduce reliance on self-reporting of foreign travel, [SSA] entered into a data exchange agreement with the Department of Homeland Security … in May 2019 to obtain foreign travel data (FTD). The FTD project is a multi-phase project that began in FY 2019 and subsequent phases of the project are impacted by resource constraints.
>
> The FTD project is the only corrective action related to absence from the U.S. that the agency is currently pursuing. Funding for the expansion of the FTD project was not available in FYs 2020 and FYs 2022 through 2024. No funding was requested for FY 2025 due to other agency priority activities.

While SSA had not determined this to be one of the leading causes of IPs for the SSI program, the FTD project could reduce the occurrence of overpayments to individuals absent from the United States. SSA plans to request funding for the FTD project in FY 2026. We recommend SSA complete the FTD exchange project.

Office of the Inspector General Oversight

We are overseeing the SSI and OASDI programs through various audits. In FY 2024, we issued 51 reports that identified over $1.5 billion in questioned costs and over $10.5 billion in Federal funds that could be put to better use. In November 2024, we reported SSA faced major challenges in improving the prevention, detection, and recovery of IPs.[52] See Appendix E for our FY 2024 reports related to improving the prevention, detection, and recovery of IPs.

CONCLUSION

While SSA has made progress implementing corrective actions to address IPs, it still has work to do. SSA must be a responsible steward of the funds entrusted to its care by minimizing the risk of making IPs and recovering overpayments when they occur. In FY 2024, SSA issued over $1.5 trillion in benefit payments. Even the slightest error in the overall payment process can result in millions of dollars in IPs. Preventing IPs is more advantageous than recovering them since the Agency must expend additional resources to recover overpayments or process additional actions to rectify underpayments. SSA should prioritize and pursue actions to implement prior audit recommendations as well as implement new, or expand existing, corrective actions to reduce the occurrence of IPs.

[51] Social Security Act, 42 U.S.C. § 1382(f) and 20 C.F.R. § 416.215.

[52] SSA, OIG, T*he Social Security Administration's Major Management and Performance Challenges During Fiscal Year 2024*, *022401*, p. 21 (November 2024).

Recommendations

We recommend SSA:

1. Complete the FTD exchange project.

2. Finalize the IPAS for relationship and dependency overpayment deficiency dollars.

In our prior audit reports, we recommended SSA:

- Finalize the IP alignment strategy for OASDI computations overpayment deficiency dollars.

- Conduct a study to expand AFI searches between the SSI initial application and subsequent eligibility redeterminations.

- Complete the expansion study for AFI and assess the effectiveness of lowering the countable liquid resource tolerance to $0.

SSA has not implemented these recommendations. We encourage SSA to continue working on the existing recommendations from our prior reports.

Agency Comments

SSA agreed with our recommendations. In response to recommendation 1, SSA acknowledged that completing the FTD project could reduce the occurrence of SSI overpayments to individuals absent from the United States. According to SSA, the FTD project is the only corrective action it is currently pursuing to address this issue. However, SSA also stated it has been unable to advance the FTD project due to funding constraints. We encourage SSA to prioritize the FTD project for funding and completion to enable it to detect and prevent more improper payments and increase its payment accuracy. See Appendix F for the full text of the Agency's response.

APPENDICES

Appendix A – AGENCY REPORTING REQUIREMENTS

Office of Management and Budget (OMB) Circular A-136 outlines the information agencies are required to address in their annual *Agency Financial Report* or *Performance and Accountability Reports*. This information includes actions taken to address audit recovery recommendations.[1] OMB guidance defines significant improper payments (IP) as either exceeding $10 million and 1.5 percent of the program's total annual outlays or exceeding $100 million, regardless of the associated percent of the program's total outlays.[2] For each program and activity identified as at risk for significant IPs, the Social Security Administration (SSA) is required to use a sampling estimation methodology to produce a statistically valid estimate of the IPs and include those estimates in the materials that accompany the Agency's annual financial statements.[3]

Annual Data Call

Beginning in Fiscal Year (FY) 2020, information previously required by OMB Circular A-136[4] is reported on the payment accuracy website[5] through the OMB payment integrity annual data call.[6] OMB uses the data call information to populate the information posted on paymentaccuracy.gov. The data call instructions require that agencies complete a survey for agency compliance with the *Payment Integrity Information Act of 2019*, fraud, do not pay initiatives, recovery activities/audits, and program-level questions for each program with significant IPs.

[1] OMB, *Financial Reporting Requirements*, *Circular A-136 Revised*, section II.4.5 pp. 111 and 112 (2024).

[2] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, part II, sec. (C)(1), p. 19 (2021).

[3] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, part II, sec. (B), pp. 17 - 18 (2021).

[4] OMB, *Financial Reporting Requirements*, *Circular A-136 Revised*, sec. II.4.5 pp. 111 and 112 (2024).

[5] *Payment Accuracy,* paymentaccuracy.gov (last visited on March 6, 2025).

[6] OMB Annual Data Call instructions are posted to community.max.gov (restricted access).

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Quarterly Scorecards

Each quarter, high-priority programs must provide information through a mechanism determined by OMB. OMB determined this information would be provided through quarterly surveys, and the collected information will be published quarterly in a Payment Integrity Scorecard on paymentaccuracy.gov. This published information will fulfill the High Dollar Overpayment Reporting Requirements[7] and the High-Priority Program Reporting Requirements.[8]
The quarterly survey questions require that agencies report

- a description of the program;
- the status of each of the actions taken in the quarter;
- the leading root causes of IPs, the mitigation strategies to develop and address the root causes, and the impact of the mitigation strategies;
- the top two goals for the quarter, the progress of them, and the expected completion date of the goal;
- the top three accomplishments and completion dates; and
- actions taken to recover overpayments.

[7] Reducing Improper Payments, Executive Order 13520 of November 20, 2009, 74 Fed. Reg. 62,201, p. 62,203 (November 25, 2009).

[8] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21- 19*, part VII, section (B)(1), p. 56 (2021).

Appendix B – INSPECTOR GENERAL REPORTING RESPONSIBILITIES

Our compliance review for Fiscal Year (FY) 2024 used a combination of requirements in Office of Management and Budget (OMB) Circulars A-123, Appendix C, *Requirements for Payment Integrity Improvement,*[1] and A-136 *Financial Reporting Requirements;*[2] OMB Annual Data Call Instructions;[3] OMB Quarterly Surveys;[4] and the Council of the Inspectors General on Integrity and Efficiency's guidance required under the *Payment Integrity Information Act of 2019* (PIIA).[5]

OMB guidance specifies that each agency's Inspector General review the improper payment (IP) information in its annual *Agency Financial Report* or *Performance and Accountability Report* and accompanying materials[6] to determine whether the agency complied with PIIA.[7] According to OMB, compliance with PIIA means the agency has

1. published payment integrity information with the annual financial statement;
2. posted the annual financial statement and accompanying materials on the agency website;
3. conducted an IP risk assessment for each program with annual outlays greater than $10 million in at least 1 of the last 3 years;
4. adequately concluded whether the program is likely to make IPs and Unknown Payments (UP) above or below the statutory threshold;
5. published IP and UP estimates for programs susceptible to significant IPs and UPs in the accompanying materials to the annual financial statement;
6. published corrective action plans for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement;
7. published IP and UP reduction target for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement;

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[1] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, (2021).

[2] OMB, *Financial Reporting Requirements*, *Circular A-136 Revised* (2024).

[3] OMB Annual Data Call instructions are posted to community.max.gov (restricted access).

[4] OMB, *Program Scorecards*, paymentaccuracy.gov (last visited on March 6, 2025).

[5] Council of the Inspectors General on Integrity and Efficiency, *Guidance for Payment Integrity Information Act OIG Compliance Reviews* (2024).

[6] Accompanying materials include information provided by SSA through the annual data calls and quarterly surveys to OMB that is used to populate information on paymentaccuracy.gov, including quarterly program scorecards, annual IP datasets and the annual IPs dashboard.

[7] *Payment Integrity Information Act of 2019*, 31 U.S.C. §§ 3351-3353.

8. demonstrated improvements to payment integrity or reached a tolerable IP and UP rate;
9. developed a plan to meet the IP and UP reduction target; and
10. reported an IP and UP estimate of less than 10 percent for each program for which an estimate was published in the accompanying materials to the annual financial statement.

According to OMB, if an agency does not meet one or more of these requirements, it is not compliant with PIIA.[8]

Quarterly Scorecards

OMB requires that each agency's Inspector General assess the information provided on the agency's quarterly scorecards published on paymentaccuracy.gov and determine the extent of Inspector General oversight warranted to prevent monetary loss IPs. In addition, based on the information provided on the quarterly scorecards, the Inspector General may provide the agency head with concrete and actionable recommendations for modifying the agency's plans to recover monetary loss IPs as well as any actions the agency intends to take to prevent IPs and UPs from occurring in the future.

[8] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, Part VI, section (A), pp. 43 through 49 (2021).

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Appendix C – SCOPE AND METHODOLOGY

To accomplish our objectives, we:

- Reviewed the *Payment Integrity Information Act of 2019* (PIIA);[1] Office of Management and Budget (OMB) Circulars A-123, Appendix C, *Requirements for Payment Integrity Improvement,*[2] and A-136, *Financial Reporting Requirements;*[3] OMB Annual Data Call Instructions;[4] and Council of the Inspectors General on Integrity and Efficiency's guidance[5] to ensure compliance with all requirements of PIIA.

- Reviewed the payment integrity section of the Social Security Administration's (SSA) Fiscal Year (FY) 2024 *Agency Financial Report* and FY 2024 accompanying materials, which include information SSA provides through quarterly surveys and annual data calls to OMB that is used to populate information on paymentaccuracy.gov. Information on paymentaccuracy.gov includes quarterly program scorecards, annual improper payment datasets, and the annual improper payments dashboard.

- Reviewed applicable Federal laws and regulations and SSA's *Program Operations Manual System*.

- Requested and analyzed source data from SSA's Office of Mission Support to support material figures and statements in the Agency Financial Report and accompanying materials for accuracy and completeness.

- Reviewed meeting minutes for the Improper Payments Oversight Board and Associate Commissioner Improper Payments Roundtable.

- Reviewed the Improper Payments Prevention Branch's monthly initiatives at a glance and Improper Payments Alignment Strategies.

We conducted our audit from July 2024 through April 2025. The primary SSA entity audited was the Office of Mission Support. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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[1] *Payment Integrity Information Act of 2019 (PIIA),* Pub. L. No. 116-117, 134 Stat. 113 (2020).

[2] OMB, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement, M-21-19*, (2021).

[3] OMB, *Financial Reporting Requirements*, *Circular A-136 Revised* (2024).

[4] OMB Annual Data Call instructions are posted to community.max.gov (restricted access).

[5] Council of the Inspectors General on Integrity and Efficiency, *Guidance for Payment Integrity Information Act OIG Compliance Reviews* (2024).

Using the information we obtained from SSA and documentation we reviewed, we determined the computerized data we used during our audit were sufficiently reliable given our objectives and the intended use of the data should not lead to incorrect or unintentional conclusions.

We assessed the significance of internal controls necessary to satisfy the audit objectives. This included an assessment of the five internal control components, including control environment, risk assessment, control activities, information and communication, and monitoring. In addition, we reviewed the principles of internal controls as associated with the audit objectives. We identified the following five components and six principles as significant to the audit objectives.

- Component 1: Control Environment
    - Principle 2: Exercise oversight responsibility
- Component 2: Risk Assessment
    - Principle 7: Identify, analyze, and respond to risk
    - Principle 9: Analyze and respond to change
- Component 3: Control Activities
    - Principle 10: Design control activities
- Component 4: Information and Communication
    - Principle 15: Communicate externally
- Component 5: Monitoring
    - Principle 17: Evaluate issues and remediate deficiencies

Appendix D – The Social Security Administration's Initiatives

The Social Security Administration (SSA) provided the following narrative on its initiatives in progress for improper payments:

- **The Technician Experience Dashboard (TED)** - TED provides a holistic customer view, transaction history, and modernized path for inputs, which saves time and improves accuracy. In February 2024, SSA rolled TED out to all field offices and workload support units nationwide. Numerous enhancements were added to TED throughout the year, including integration of all Registration and Customer Support functionality, the ability to record and capture outbound call details, and the addition of External Tasks that allow technicians to launch from TED to external applications to complete actions, then return to TED to indicate the actions taken and build the customer's history.

- **Electronic Work Continuing Disability Review Application, formally known as Continuing Disability Review (CDR) Product -** Development is underway to replace and modernize the system technicians use to process CDRs based on work activity. The new system will enforce policy and best practices with an intuitive user interface and will eliminate system limitations that lead to large improper payments through delays and processing errors. This application will streamline the disability review process and will have a positive impact in reducing substantial gainful activity improper payments.

- **The Consolidated Claims Experience (CCE) -** SSA plans for this modern, consolidated user interface to decrease training time, streamline the user's process, and enable the Agency to phase out several legacy systems. CCE includes initial claims intake processing, and post-entitlement/post-eligibility activities. CCE will automate more computations, reduce manual actions, and assist technicians with identifying potential benefits for claimants or recipients to prevent missed entitlements. In Fiscal Year (FY) 2024, SSA released several updates to improve software performance.

- **Simplify Notices and Communications (OASDI):**

  In FY 2024 SSA,

  - Published the revised Notice Language Clearance Process policy that incorporates review and approval of notice language through the plain language and customer experience lenses with the goal of increasing clarity and customer satisfaction with our communications to the public.

  - Released a simplified *Work Activity* Form SSA-821 to the Office of Management and Budget (OMB) in August 2024 for approval. SSA also updated the Self-Employment Activity form (SSA-820) to simplify, consolidate and clarify the questions. SSA plans to send the form to OMB in FY 2025 for approval.

  - Formed a workgroup to redesign the *Subsidy Questionnaire* (Form SSA-3033) to simplify and reduce the burden on employers/service providers in responding to questions on whether they are providing subsidy to applicants and beneficiaries.

The Form provides examples of subsidy and calculating a subsidy amount. SSA will implement the revised Form in FY 2025.

- **WorkSmart (OASDI):** WorkSmart identifies Disability Insurance beneficiaries whose earnings put them at risk of being overpaid. In FY 2024, WorkSmart continued to alert cases for work CDRs based on available earnings data. WorkSmart will use available payroll information exchange data to alert cases for a work CDR.

- **Robotic Process Automation (Bot)** - SSA is using robotics software to improve business processes and eliminate manual actions. At the processing centers, seven Bots are available for technicians to assist with processing manual awards or post-entitlement actions. Bots increase the speed and accuracy of manual processing. Bots use the user interface to capture data and manipulate applications like humans. They interpret, trigger responses, and communicate with other systems to perform a variety of repetitive tasks. Bots can mimic many, if not most, human user actions. A workgroup led by the Office of Customer Service is working on proposals for additional Bots that will assist technicians in processing specific workloads or actions.

- **PolicyNet -** In September 2024, SSA released the 21st Century PolicyNet, which replaced PolicyNet, the 20+ year-old software platform that contains multiple applications and hosts tens of thousands of pages of policy instruction. The overall goals of 21st Century PolicyNet are an improved user experience, process efficiencies for the author, publisher, and researcher role, as well as improving searching capabilities, including the use of intelligent search.

- **Various Policy/Processing Reminders Related to Computations Released** - SSA updated integrated benefit computations resources and issued processing reminders on workers compensation lump sum processing.

- **Use of Behavioral Insights in External Communications -** In FY 2024, SSA used behavioral insights when drafting and publishing blogs on the importance of reporting changes to the agency.

- **Historical Death Data -** At the end of FY 2024, SSA awarded a contract to the National Association for Public Health Statistics and Information Systems on the acquisition of historical state death data. They are working with the National Association for Public Health Statistics and Information Systems on a multi-year effort to retrieve death data for states not previously audited by the Office of the Inspector General and before the Electronic Death Registration is implemented.

Appendix E – Fiscal Year 2024 Office of the Inspector General Reports

The following Office of the Inspector General reports were related to improving the prevention, detection, and recovery of improper payments.

- *Representative Payees Not in the Electronic Representative Payee System*, 052401 (September 2024)
- *Match of National Missing and Unidentified Persons System Information Against Social Security Administration Records*, 062402 (September 2024)
- *Unclaimed Social Security Administration Assets Held by States and the District of Columbia*, 062329 (September 2024)
- *Supplemental Security Income Recipients Who Under-report Financial Account Balances*, A-02-21-51028 (September 2024)
- *Discrepancies in the Electronic Representative Payee System*, 052402 (September 2024)
- *Disabled Beneficiaries Receiving Direct Payments Who Previously Had Representative Payees*, 052403 (September 2024)
- *Follow-up on the Accuracy of the Social Security Administration's Manual Billing Process to Collect Medicare Premiums*, 012310 (September 2024)
- *Follow-up Review of Numident Death Information Not Included on the Death Master File*, 062301 (July 2024)
- *Cross-referred Social Security Numbers*, 062308 (July 2024)
- *Challenges in Recovering Supplement Security Income Overpayments*, A-07-21-51018 (July 2024)
- *Preventing, Detecting, and Recovering Improper Payments*, 072401 (July 2024)
- *Match of State Department Death Information Against Social Security Administration Records*, 062313 (May 2024)
- *Disability Payments to Beneficiaries or Recipients Receiving Illinois or Texas Workers' Compensation Benefits*, A-06-20-50922 (May 2024)
- *Impact of Undetected Marriages on Social Security Administration Payments*, 012317 (April 2024)
- *The Social Security Administration's Enforcement of the Earnings Test*, A-08-21-51049 (February 2024)
- *Match of Puerto Rico Death Information Against Social Security Administration Records*, 022332 (January 2024)

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Appendix F– AGENCY COMMENTS

SOCIAL SECURITY
Office of the Commissioner

MEMORANDUM

Date: May 6, 2025 Refer To: TQA-1

To: Michelle L. Anderson
Acting Inspector General for Audit

From: Chad Poist
Chief of Staff

Subject: Office of the Inspector General Draft Report, "The Social Security Administration's Compliance with the Payment Integrity Information Action of 2019 in Fiscal Year 2024" (152415) -- INFORMATION

Thank you for the opportunity to review the draft report. We agree with the recommendations.

The foreign travel data (FTD) project could reduce the occurrence of overpayments to individuals absent from the United States. FTD is a multi-phase project that began in May 2019, when we signed a Memorandum of Agreement with the Department of Homeland Security/Customs Border Protection to gain access to foreign travel data. Due to funding constraints, we have not been able to advance the project since that time. So, while we agree with the recommendation to complete the foreign travel data project, absent funding for this project, we cannot make further gains.

Please let me know if I can be of further assistance. You may direct staff inquiries to

Amy Gao, Director of the Audit Liaison Staff, at (410) 966-1711.

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