



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

*Audit Report*

Manual Actions on Old-Age,  
Survivors and Disability Insurance  
Post-entitlement Alerts

*A-07-18-50621 | March 2020*



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

**MEMORANDUM**

**Date:** March 9, 2020

**Refer To:**

**To:** The Commissioner

**From:** Inspector General

**Subject:** Manual Actions on Old-Age, Survivors and Disability Insurance Post-entitlement Alerts  
(A-07-18-50621)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether Social Security Administration processing center employees correctly processed Old-Age, Survivors and Disability Insurance post-entitlement alerts produced by the Title II Redesign system.

If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, at 410-965-9700.

A handwritten signature in cursive script that reads 'Gail S. Ennis'.

Gail S. Ennis

Attachment

# Manual Actions on Old-Age, Survivors and Disability Insurance Post-entitlement Alerts

## A-07-18-50621



March 2020

Office of Audit Report Summary

### Objective

To determine whether Social Security Administration (SSA) processing center (PC) employees correctly processed Old-Age, Survivors and Disability Insurance (OASDI) post-entitlement alerts produced by the Title II Redesign (T2R) system.

### Background

Once a beneficiary becomes entitled to OASDI benefits, SSA must update its records to reflect changes in the beneficiary's circumstances. SSA refers to these updates as post-entitlement actions. T2R is SSA's primary post-entitlement processing system. In some instances, T2R cannot process post-entitlement actions to update beneficiaries' records and PC employees must do so.

When updates must be manually processed, T2R produces alerts. A PC employee must review the alert, correct any issues that prevented T2R from automatically processing the update, and make the necessary changes to the beneficiary's record.

We identified 52,108 OASDI post-entitlement alerts T2R produced on or after January 1, 2017 and designated as processed and completed by PC employees from January 24 through February 6, 2019. We reviewed a random sample of 200 post-entitlement alerts to determine whether PC employees processed them correctly.

### Findings

Of the 200 OASDI post-entitlement alerts we reviewed, PC employees incorrectly processed 83 (42 percent). Of the 83 incorrectly processed alerts, 48 resulted in improper payments totaling \$329,767 through May 2019. Based on our sample results, we estimate PC employees incorrectly processed approximately 555,000 alerts, resulting in approximately \$1.3 billion in improper payments.

For 45 of the 83 alerts, PC employees took incorrect manual post-entitlement actions and did not update the beneficiaries' records correctly. Our analysis showed that, in some instances, employees took incorrect manual actions because they did not—for unknown reasons—follow the provided instructions when they processed alerts. In other instances, employees may have incorrectly processed the alerts because of vague and generic alert language and corresponding written instructions.

Employees processed the remaining 38 alerts incorrectly because they cleared the alerts without taking corrective actions. SSA does not require that employees document why they did not take corrective action on alerts. Thus, we were unable to determine why employees cleared the alerts without taking action.

### SSA Initiatives to Improve Manual Processing

In recent months, SSA has provided PC employees refresher training on the manual processing of post-entitlement actions and implemented a national quality review process that includes these actions. In a future audit, we will ascertain whether these newly implemented initiatives improve the accuracy of post-entitlement processing actions.

### Recommendations

We made seven recommendations for SSA to correct errors identified during our review, improve its controls over PC employees' actions on post-entitlement alerts produced by T2R, and monitor training and quality initiatives to increase post-entitlement alert processing accuracy. SSA agreed with our recommendations.

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## **ABBREVIATIONS**

OARO	Office of Analytics, Review, and Oversight
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
PC	Processing Center
PCACS	Processing Center Action Control System
POMS	Program Operations Manual System
SSA	Social Security Administration
T2R	Title II Redesign
U.S.C.	United States Code

## OBJECTIVE

Our objective is to determine whether Social Security Administration (SSA) processing center (PC) employees correctly processed Old-Age, Survivors and Disability Insurance (OASDI) post-entitlement alerts produced by the Title II Redesign (T2R) system.

## BACKGROUND

The OASDI program provides benefits to wage earners and their family members who meet certain criteria in the event the wage earner retires, becomes disabled, or dies.<sup>1</sup> Once a beneficiary becomes entitled to OASDI benefits, SSA must update its records to reflect changes in the beneficiary's circumstances to ensure it continues issuing the correct benefit payment. SSA refers to updates to existing records as post-entitlement actions. Some post-entitlement actions include predictable events, such as beneficiaries attaining specific ages when SSA must terminate or adjust their benefits. For example, SSA terminates children's benefits at age 18 unless they are a full-time elementary or secondary school student or disabled.<sup>2</sup> Also, SSA converts disability benefits to retirement benefits when beneficiaries attain full retirement age.<sup>3</sup> Other post-entitlement actions include unpredictable events, such as a beneficiary's death, changes of address or marital status, or work activity.<sup>4</sup>

T2R is SSA's primary post-entitlement processing system, which automatically processes approximately 50 million post-entitlement actions annually. However, in some circumstances, T2R cannot automatically process post-entitlement actions to update beneficiaries' records and PC employees must do so manually. Common situations that require manual processing include changes to beneficiaries' records as follows.

- **Occurred longer than 4 years in the past:** For example, beneficiaries may report to SSA marriages or divorces that occurred more than 4 years ago.
- **Involve beneficiaries who are entitled to benefits under multiple records:** For example, beneficiaries may receive benefits based on their own earnings and a spouse's earnings.
- **Apply to records with incorrect or incomplete information:** For example, beneficiaries' records may contain incorrect benefit payment amounts if SSA employees previously miscalculated the beneficiaries' earnings.

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<sup>1</sup> *Social Security Act*, 42 U.S.C. §§ 402,423 (govinfo.gov 2018).

<sup>2</sup> SSA, *POMS*, RS 00203.035, A.2 (March 21, 2016) and RS 00203.001, A.1 (July 9, 2018).

<sup>3</sup> SSA, *POMS*, GN 00201.005, B.3 (March 26, 2019).

<sup>4</sup> SSA, *POMS*, GN 02602.050, A (September 3, 2019) and GN 00203.005, C.2 (March 1, 1997).

When updates to beneficiaries’ records require manual processing, T2R sends alerts to the Processing Center Action Control System (PCACS).<sup>5</sup> SSA uses PCACS to track and manage all PC workloads, including T2R alerts. SSA assigns T2R alerts via PCACS by adding them to PC employees’ pending workload lists. PC employees must review the alerts and identify any issues on the records that prevented T2R from automatically processing the post-entitlement actions. Then, they must resolve the issues and manually make the necessary changes to the beneficiaries’ records. After PC employees address the alerts, they move the alerts from their pending to completed workload lists, which also designates them as completed in PCACS.

During Calendar Years 2013 through 2018, T2R produced approximately 8.3 million alerts for post-entitlement actions it could not automatically process (see Table 1).<sup>6</sup> Although T2R produced alerts for fewer than 3 percent of total post-entitlement actions during this timeframe, the resulting workload for PC employees was substantial. Further, PC employees must manage the T2R alert workload in conjunction with other priority OASDI workloads, such as benefit claims, hearings, and continuing disability reviews.<sup>7</sup> To reduce the impact the T2R alert workload has on its PCs, SSA plans to increase the automation of post-entitlement actions in the future, which would reduce the number of alerts requiring manual action; however, according to comments from multiple SSA components, implementation “. . . is on hold . . . due to systems available resources.”<sup>8</sup>

**Table 1: T2R Alerts, Calendar Years 2013-2018<sup>9</sup>**

Year	Alerts	Total Actions	Percent of Actions with Alerts
2013	1,252,327	54,738,524	2.3%
2014	1,140,155	47,093,248	2.4%
2015	1,306,561	47,174,762	2.8%
2016	1,587,222	52,203,393	3.0%
2017	1,530,300	53,178,007	2.9%
2018	1,453,966	54,201,866	2.7%
<b>Total</b>	<b>8,270,531</b>	<b>308,589,800</b>	<b>2.7%</b>

<sup>5</sup> T2R produces three categories of output: alerts, exceptions, and processing limitations. Throughout this report, we use the term “alert” to refer to all categories of output produced by T2R.

<sup>6</sup> T2R produces one alert for each attempted action.

<sup>7</sup> PC employees are responsible for resolving complex OASDI issues.

<sup>8</sup> SSA provided the comments in a consolidated response from the Offices of Operations; Systems; and Analytics, Review and Oversight.

<sup>9</sup> Data are from SSA’s Benefit Information Systems’ *T2 Process Statistics – Yearly Summary* report.

From PCACS, we identified 52,108 OASDI post-entitlement alerts produced by T2R on or after January 1, 2017 and designated as processed and completed by PC employees from January 24 through February 6, 2019. We reviewed a random sample of 200 post-entitlement alerts to determine whether PC employees processed them correctly.<sup>10</sup>

## RESULTS OF REVIEW

Of the 200 OASDI post-entitlement alerts we reviewed, PC employees incorrectly processed 83 (42 percent).

- Of the 83, 48 resulted in improper payments totaling \$329,767 through May 2019 (see Table 2). This includes \$134,562 in overpayments and \$195,205 in underpayments. Based on our sample results, we estimate PC employees incorrectly processed approximately 318,000 alerts, resulting in approximately \$1.3 billion in improper payments.<sup>11</sup>
- The remaining 35 did not result in improper payments. Improper payments did not occur because the post-entitlement action would not have changed the beneficiaries' benefit payments. We estimate PC employees incorrectly processed approximately 237,000 alerts that did not result in improper payments. However, T2R may continue to produce alerts requiring manual actions whenever it attempts to change the records until PC employees manually resolve the issues causing the alerts and make the necessary changes to the records.

For 45 of the 83 alerts, PC employees took incorrect manual post-entitlement actions and did not update the beneficiaries' records correctly. Our analysis showed that, in some instances, employees took incorrect manual actions because they did not—for unknown reasons—follow the provided instructions when they processed alerts. In other instances, employees may have incorrectly processed the alerts because of vague and generic alert language and corresponding written instructions. Employees processed the remaining 38 alerts incorrectly because they cleared the alerts without taking corrective actions. SSA does not require employees to document why they did not take corrective action on alerts. Thus, we were unable to determine why employees cleared the alerts without taking action.

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<sup>10</sup> See Appendix A for the scope and methodology of our review.

<sup>11</sup> We determined one error, which had a \$131,915 improper payment, was an outlier; therefore, we excluded it from our projected improper payments. See Appendix B for our sampling methodology and results.

**Table 2: Reasons for Incorrect Alert Processing**

Error Reasons	Errors with Improper Payments	Overpayments	Underpayments	Total Improper Payments (Absolute)	Errors Without Improper Payments	Error Total
Incorrect Manual Actions	27	\$52,683	\$54,478	\$107,161	18	45
No Corrective Actions	21	\$81,879	\$140,727	\$222,606	17	38
<b>Total</b>	<b>48</b>	<b>\$134,562</b>	<b>\$195,205</b>	<b>\$329,767</b>	<b>35</b>	<b>83</b>

## Incorrect Manual Actions

PC employees took incorrect manual post-entitlement actions when they processed 45 of the 200 post-entitlement alerts and did not update beneficiaries’ records correctly. For 27 of the 45 alerts, employees’ incorrect manual actions resulted in improper payments totaling \$107,161. The errors for the remaining 18 alerts did not result in improper payments. However, because employees incorrectly addressed the alerts, future post-entitlement actions may continue to require manual processing.

Our analysis showed that, in some instances, employees did not—for unknown reasons—follow the provided instructions when they processed post-entitlement alerts. This resulted in the employees taking incorrect manual actions. In other instances, employees may have incorrectly processed the alerts because of vague alert language and corresponding written instructions. A June 2018 report by SSA’s Office of Analytics, Review, and Oversight (OARO), also stated employee errors in processing post-entitlement alerts occurred in part because the “. . . [alert language] that gave technicians information on how to correct the processing was vague and generic.”<sup>12</sup>

When SSA assigns an alert to a PC employee’s workload list, he/she must determine the appropriate corrective actions to take by reviewing the alert details, which include an alpha-numeric code and a brief description of the attempted action and why T2R could not automatically process the action. Then, the employee must search for the alpha-numeric code in SSA’s written instructions to determine how to process the alert. We found SSA’s alert details and written instructions could be improved, as they did not always (1) specify what action was required by the employee, (2) identify which beneficiaries’ records the employee needed to correct, or (3) include issue-specific guidance on corrective actions employees needed to take.

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<sup>12</sup> SSA, OARO, *Fiscal Years 2013-2017 Title II Post-Entitlement Processing Center Inline Review Report*, p. ii (June 2018).

For example, SSA assigned a PC employee a T2R alert, with an alert reason of “unable to process with two [dually entitled beneficiaries].” SSA’s written instructions for the alert directed the employee to “verify and correct or add any missing multiple entitlement data.” However, no beneficiaries on the record had incorrect or missing multiple entitlement data; therefore, the employee was provided inaccurate instructions for addressing the alert. Accordingly, the employee did not take necessary actions to increase the benefits payable to beneficiaries on the record beginning January 2015, resulting in a \$4,852 underpayment to the beneficiaries as of October 2019. Further, the underpayment will increase each month until SSA corrects the record. The underpayment may have been avoided had SSA’s alert instructions accurately outlined the actions required by the employee.

In May 2015, OARO established the T2R Workgroup, comprising employees from multiple SSA components, to review and analyze alert codes and descriptions. The workgroup meets each month to discuss potential updates and is engaged in an ongoing discussion of policies undergoing further analysis. SSA stated the workgroup has initiated many updates to policies and procedures since its inception. However, based on our analysis of sample alerts and their related processing procedures, many of the alert codes and descriptions remain vague and alert processing accuracy remains a concern. Thus, SSA should ensure the T2R Workgroup continues analyzing and updating alert language and corresponding written processing procedures to provide PC employees with detailed and specific guidance.

## No Corrective Actions

PC employees cleared 38 of the 200 post-entitlement alerts without taking required corrective actions. When employees clear alerts, they remove the alerts from their pending workload lists and PCACS designates them as completed. According to SSA’s Office of Operations, alerts should only be cleared when “an employee completes all necessary actions” or “verifies that all actions [to address the alert] were previously processed.”

For 21 of the 38 alerts on which employees did not take necessary actions to correct the beneficiaries’ records, improper payments resulted, totaling \$222,606. For example, T2R produced an alert because the benefit amounts for children receiving benefits under their deceased mother’s earnings record were incorrect. An employee cleared the alert without taking corrective action and did not document why he/she did not take action. The children’s benefit amounts were incorrect beginning August 2016, and SSA overpaid them \$23,508 through October 2019. Further, the overpayments will increase each month until SSA corrects the children’s benefit amounts.

For the remaining 17 alerts, employees’ failure to take corrective actions did not result in improper payments. However, because employees did not address the reasons for the alerts, future actions may continue to require manual processing. For example, T2R produced an alert when it could not update Medicare information due to invalid payment information on the record. An employee cleared the alert and included a remark that no action was necessary. When a subsequent action was attempted, T2R produced another alert because the employee had not resolved the invalid payment information and SSA had not detected the unresolved alert.

T2R will produce alerts requiring manual actions any time it attempts to change the record until a PC employee takes a manual action to correct record.

SSA does not require that employees document why they did not take action on alerts. Thus, we were unable to determine why employees cleared the alerts without taking action. Further, SSA does not have a process for managers to monitor alerts employees cleared without taking corrective actions. To mitigate the risk of employees inappropriately clearing alerts, SSA should update its policy to require that PC employees document their reasons for clearing alerts without taking corrective actions and monitor T2R alerts employees cleared without taking corrective actions.

## SSA Initiatives to Improve Manual Processing

Our review identified a 42-percent error rate in PC employees’ T2R alert processing. OARO also identified inaccuracies in employees’ processing of T2R alerts in three reports with error rates ranging from 27 to 38 percent (see Table 3).<sup>13</sup>

**Table 3: OARO Identified T2R Alert Processing Error Rates**

Report Date	Fiscal Years Included in Review	T2R Alert Processing Error Rate
October 2012	2011	29%
May 2014	2012 - 2013	38%
June 2018	2013 - 2017	27%

Specifically, OARO reviewed manual post-entitlement actions from Fiscal Years 2011 through 2017 and identified persistent and substantial errors, including employees

- taking manual actions that did not address the reason for the alerts,
- making errors in manual calculations or inputs,
- incorrectly referring the alert to another employee for action, and
- not taking corrective action.

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<sup>13</sup> SSA, Office of Quality Performance, *Fiscal Year 2011 Title II Post-Entitlement Processing Center Actions Report* (October 2012); SSA, Office of Budget, Finance, Quality, and Management, *Fiscal Years 2012 and 2013 Title II Post-Entitlement Processing Center Actions Report* (May 2014); SSA, OARO, *Fiscal Years 2013-2017 Title II Post-Entitlement Processing Center Inline Review Report* (June 2018).

In addition to establishing the T2R Workgroup previously discussed in this report, OARO recommended SSA address the errors by providing employees refresher training and conducting quality reviews.<sup>14</sup> According to OARO, SSA has taken steps to mitigate the errors in this workload.

- In Calendar Year 2019, SSA provided PC employees refresher training on processing various post-entitlement actions. Though the training did not focus on interpreting and processing T2R alerts, it did provide instruction on using automation tools to improve the accuracy and efficiency of manual post-entitlement actions in general.
- In October 2019, SSA implemented a national PC quality review program, which will increase management oversight of PC workloads. Under the program, SSA will randomly select and review “a specified number” of cases for each employee. The program will provide employees feedback on their case processing accuracy and managers information to determine training needs and measure training effectiveness. However, although manually processed post-entitlement alerts may be randomly selected for review, the program will not specifically target the T2R alert workload.

OARO does not plan to conduct regular internal reviews of manual post-entitlement actions. However, as resources permit, OARO stated it may conduct an additional review of manually processed T2R alerts in the future “. . . to determine if the steps [SSA has] taken were effective in improving the accuracy of these types of cases.” Based on the large dollar value of the errors identified in our audit, we recommend SSA implement a quality review focused specifically on manually processed T2R alerts to ensure the accuracy of this workload improves.

## CONCLUSIONS

PC employees incorrectly processed 42 percent of the post-entitlement alerts we reviewed. The errors occurred because employees (1) took incorrect manual actions and (2) cleared alerts without taking corrective actions. Accordingly, we estimate PC employees did not correctly process approximately 555,000 alerts, which resulted in approximately \$1.3 billion in improper payments to beneficiaries. SSA’s internal reviews also identified error rates ranging from 27 to 38 percent spanning a 7-year period. Because of the financial impact of T2R alert processing errors and persistent error rate, it is imperative SSA establish controls to improve the accuracy of this complex and error-prone workload. Even a small improvement in the accuracy of this workload could substantially reduce improper payments. For example, if the error rate for the population we identified decreased by 25 percent, SSA could avoid improper payments totaling approximately \$335 million.

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<sup>14</sup> SSA, OARO, *Fiscal Years 2013-2017 Title II Post-Entitlement Processing Center Inline Review Report* (June 2018).

SSA initiated multiple initiatives to improve PC employees' manual processing of post-entitlement actions including establishing the T2R Workgroup. Further, SSA recently provided PC employees refresher training and implemented a national quality review program that included post-entitlement actions. It is too early to determine whether the new initiatives will improve post-entitlement processing accuracy. In a future audit, we will ascertain whether these newly implemented initiatives have improved the accuracy of post-entitlement processing actions.

## RECOMMENDATIONS

We recommend SSA:

1. Correct the records associated with the 83 T2R alerts identified by our audit.
2. Analyze a sample of the remaining T2R alerts in our population that may require corrective action and assess the feasibility of broadening the review.
3. Ensure the T2R Workgroup continues analyzing and updating alert language and corresponding written processing procedures to provide PC employees with detailed and specific guidance.
4. Update its policy to require that PC employees document their reasons for clearing alerts without taking corrective actions.
5. Monitor T2R alerts employees cleared without taking corrective actions.
6. Implement a quality review focused specifically on manually processed T2R alerts to ensure the accuracy of this workload improves.
7. Monitor training and quality initiatives to determine whether they improve T2R alert processing accuracy and, if not, revise the initiatives.

## AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix C.



Rona Lawson  
Assistant Inspector General for Audit

# *APPENDICES*

## Appendix A – SCOPE AND METHODOLOGY

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To accomplish our objective, we:

- Reviewed applicable sections of the *Social Security Act* and Social Security Administration’s (SSA) Program Operations Manual System, technical guidance, and reports.
- Reviewed prior SSA and Office of the Inspector General reports.
- Obtained a data extract of 52,108 Title II Redesign (T2R) alerts from the Processing Center Action Control System.<sup>1</sup> The alerts were designated as completed from January 24 through February 6, 2019. The Processing Center Action Control System purges alert records 2 weeks after SSA designates them as completed. As such, our population comprised alerts processed within a 2-week period.
- Reviewed a random sample of 200 alerts to determine whether processing center employees manually processed the alerts correctly.<sup>2</sup> To do so, we
  - Reviewed records, alert output, manual action documentation, employee remarks, and notices from the following SSA systems and queries.
    - Processing Center Action Control System
    - Transaction History Query
    - Master Beneficiary Record
    - Payment History Update System
    - Recovery of Overpayments, Accounting, and Reporting
    - Hospital Insurance/Supplemental Medical Insurance Query
    - Online Retrieval System
    - Claims File User Interface
    - Paperless Read Only Query System

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<sup>1</sup> We use the term “alert” to refer to the three categories of output produced by T2R: alerts, exceptions, and processing limitations. T2R produces one alert for each attempted action to update a beneficiary’s record.

<sup>2</sup> During our sample review, we found processing center employees designated some alerts as completed without taking corrective action, but took actions to address the issues identified in the alert in conjunction with related cases. In such cases, we verified the accuracy of the related actions, some of which occurred outside of our 2-week period.

- Considered as errors alerts for which employees did not
  - make the necessary updates to the beneficiaries' records and/or
  - correct issues on records that prevented the T2R system from automatically processing the change.<sup>3</sup>
- Determined whether errors would result in improper payments.

We conducted our review between September and October 2019 in Kansas City, Missouri. The principal entity audited was the Office of Operations. We determined the data used for this audit were sufficiently reliable to meet our objective. 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 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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<sup>3</sup> We distinguished between alerts, exceptions, and processing limitations when determining appropriate corrective actions and potential impact.

## Appendix B – SAMPLING METHODOLOGY AND RESULTS

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### Sampling

From our population of 52,108 alerts,<sup>1</sup> we selected a random sample of 200 alerts for review.

**Table B–1: Population and Sample Size**

Description	Number of Alerts
Population Size (2-week period) <sup>2</sup>	52,108
Sample Size	200
Estimated Total Population (52-week period) <sup>3</sup>	1,354,808

### Sample Errors and Projections

Social Security Administration employees incorrectly processed 83 (42 percent) of the 200 post-entitlement alerts we reviewed.

#### *Errors with Improper Payments*

Of the 83 errors, 48 resulted in improper payments totaling \$329,767.<sup>4</sup> Accordingly, we estimate processing center employees incorrectly processed approximately 318,000 alerts, resulting in improper payments totaling over \$1.3 billion (see Table B–2).

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<sup>1</sup> See Appendix A for the scope and methodology of our review.

<sup>2</sup> Our population included alerts designated as completed from January 24 through February 6, 2019. The Processing Center Action Control System purges alert records 2 weeks after SSA designates them as completed. As such, our population comprised alerts processed within a 2-week period.

<sup>3</sup> Because our population comprised alerts processed within a 2-week period, we multiplied our projections by 26 to arrive at a projection for a 52-week period. Though the alerts were processed within a 2-week period, Title II Redesign produced them on various dates between January 1, 2017 and February 6, 2019, mitigating any potential effects of cyclical shifts in the workload. Thus, we believe our population of alerts processed within this 2-week period is representative of alerts processed throughout a year.

<sup>4</sup> This includes \$134,562 in overpayments and \$195,205 in underpayments. We calculated improper payments through May 2019.

**Table B–2: Errors with Improper Payments**

Description	Number of Alerts	Improper Payments
Sample Results <sup>5</sup>	47	\$197,852
Projected Quantity/Point Estimate (2-week period)	12,245	\$51,548,360
Projection – Lower Limit (2-week period)	9,717	\$28,461,575
Projection – Upper Limit (2-week period)	15,085	\$74,635,146
Estimated Total (52-week period)	318,370	\$1,340,257,360

**Note:** All projections are at the 90-percent confidence level.

### *Errors Without Improper Payments*

The remaining 35 errors did not result in improper payments. However, because employees did not correctly address the alerts, future post-entitlement actions may continue to require manual processing and incur avoidable administrative costs.<sup>6</sup> We estimate processing center employees incorrectly processed approximately 237,000 alerts (see Table B–3).

**Table B–3: Errors Without Improper Payments**

Description	Number of Alerts
Sample Results	35
Projected Quantity (2-week period)	9,119
Projection – Lower Limit (2-week period)	6,890
Projection – Upper Limit (2-week period)	11,731
Estimated Total (52-week period)	237,094

**Note:** All projections are at the 90-percent confidence level.

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<sup>5</sup> We determined one error, which had an improper payment of \$131,915, was an outlier; therefore, we excluded it from our projected improper payments.

<sup>6</sup> We did not quantify administrative costs because SSA does not track the cost to process manual post-entitlement actions.

## Appendix C – AGENCY COMMENTS

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### SOCIAL SECURITY Office of the Commissioner

#### MEMORANDUM

Date: March 3, 2020

Refer To: S1J-3

To: Gail S. Ennis  
Inspector General

*Stephanie Hall*

From: Stephanie Hall  
Chief of Staff

Subject: Office of the Inspector General Draft Report, “Manual Actions on Old-Age, Survivors and Disability Insurance Post-entitlement Alert” (A-07-18-50621) -- INFORMATION

Thank you for the opportunity to review the draft report. We recognize that manual processing of post-entitlement actions is error prone. As a result, we recently provided refresher training to technicians on using automation tools to improve the accuracy of these actions. We also implemented a national quality review process that will include random reviews of post-entitlement actions completed by processing center (PC) technicians. We agree with OIG’s recommendations to take further action to reduce improper payments and in response, we will provide more detailed policy guidance to our technicians and emphasize the importance of resolving these alerts and documenting our actions. Additionally, through various automation initiatives, we will continue our efforts to reduce or eliminate manual actions in the PCs.

Please let me know if we can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.

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