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**U.S. OFFICE OF PERSONNEL MANAGEMENT  
OFFICE OF THE INSPECTOR GENERAL  
OFFICE OF AUDITS AND EVALUATIONS**

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# **Final Evaluation Report**

**EVALUATION OF THE U.S. OFFICE OF  
PERSONNEL MANAGEMENT RETIREMENT  
SERVICES' EFFORTS TO IDENTIFY AND  
PREVENT IMPROPER PAYMENTS**

**Report Number 2025-OEI-001**

**June 23, 2026**

# EXECUTIVE SUMMARY

## *Evaluation of the U.S. Office of Personnel Management Retirement Services' Efforts to Identify and Prevent Improper Payments*

Report No. 2025-OEI-001

June 23, 2026

### **Why Did We Conduct the Evaluation?**

Effective stewardship of taxpayer funds is a critical responsibility of the federal government. The U.S. Government Accountability Office has highlighted improper payment issues across the federal government, including the inability to reasonably assure that appropriate actions are taken to reduce them. According to the U.S. Department of the Treasury, prevention of improper payments resulting in a monetary loss is the federal government's highest priority.

Our objective was to assess the effectiveness of the U.S. Office of Personnel Management's (OPM's) Retirement Services' (RS) efforts to identify and prevent improper payments.

### **What Did We Evaluate?**

We performed a comprehensive review of the surveys and projects OPM RS conducts to confirm eligibility of benefits and prevent improper payments. The scope and corresponding results of this evaluation were based on retirement eligibility data and activity that occurred at various times during fiscal years 2022 through 2024.

### **What Did We Find?**

During our evaluation, we determined that OPM RS conducts five surveys and three projects on varying schedules to verify annuitants' continued eligibility for retirement benefits and ultimately, to maintain the integrity of the annuity roll. RS uses these surveys and projects to identify accounts that should be suspended or dropped. Both suspended and dropped accounts will not receive funds dispersed from the Retirement Trust Fund.

RS provided evidence supporting their efforts to confirm eligibility of benefits and mitigate improper payments through retirement eligibility surveys and projects. However, we identified opportunities to improve RS practices in the following areas:

1. Enhancing efficiencies through transitioning to electronic administration of all surveys and projects
2. Utilizing current data and identifying and employing independent verification of survey responses
3. Improving the timeliness of suspensions
4. Consistently complying with prescribed frequencies for all surveys and projects
5. Ensuring the completeness of SOPs
6. More effective handling of projects associated with higher risk populations
7. Strengthening document retention practice

We made 12 recommendations that, if implemented, could improve RS' efforts to identify and prevent improper payments. RS concurred with all our recommendations.



**James L Tuel, Jr.**  
*Acting Deputy Assistant Inspector  
General for Audits*

# ABBREVIATIONS

<b>CSRS</b>	<b>Civil Service Retirement System</b>
<b>FERS</b>	<b>Federal Employees Retirement System</b>
<b>GAO</b>	<b>U.S. Government Accountability Office</b>
<b>IRS</b>	<b>Internal Revenue Service</b>
<b>MLE</b>	<b>Minimum Level of Earnings</b>
<b>MRA</b>	<b>Minimum Retirement Age</b>
<b>OCIO</b>	<b>Office of the Chief Information Officer</b>
<b>OIG</b>	<b>Office of the Inspector General</b>
<b>OPM</b>	<b>U.S. Office of Personnel Management</b>
<b>PII</b>	<b>Personally Identifiable Information</b>
<b>RS</b>	<b>Retirement Services</b>
<b>SOL</b>	<b>Services Online</b>
<b>SOP</b>	<b>Standard Operating Procedure</b>
<b>SSA</b>	<b>U.S. Social Security Administration</b>
<b>VAMS</b>	<b>Voluntary Agency Management System</b>

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# INTRODUCTION

This evaluation report details the results from our evaluation of the U.S. Office of Personnel Management's (OPM) efforts to identify and prevent improper payments in the retirement program. This evaluation was conducted by the OPM Office of the Inspector General (OIG), as authorized by the Inspector General Act of 1978, as amended.

OPM is responsible for administering two defined benefit retirement plans that provide retirement, disability,<sup>1</sup> and survivor<sup>2</sup> benefits to federal employees. The Civil Service Retirement System (CSRS) provides retirement benefits for most employees hired before 1984. The Federal Employees Retirement System (FERS) covers most employees hired in or after 1984.

Within OPM, Retirement Services (RS) is responsible for the governmentwide administration of retirement benefits and services for federal employees, retirees, and their families, serving nearly 2.7 million federal retirees and survivors who receive monthly annuity payments. After a case is added to the annuity roll, the active roster of individuals qualified to receive an annuity benefit, RS continues to serve annuitants by managing and making changes to their accounts. Additionally, RS administers and manages various surveys and projects to verify the annuitant's continued eligibility for benefits and ultimately to maintain the integrity of the annuity roll. Specifically, RS sends annuitants surveys and verification letters to return along with other documentation to verify eligibility. The focus of these efforts is on preventing improper payments resulting from when an annuitant is no longer eligible for a retirement benefit but continues to receive payments. According to the U.S. Government Accountability Office (GAO), improper payments are always an area of concern for the federal government. These include overpayments, underpayments, payments made to ineligible recipients, or even payments that weren't properly documented. While fraudulent payments are considered improper, not all improper payments are the result of fraud.

RS currently conducts five surveys and three projects on varying schedules to identify and prevent improper payments. The chart on the following page briefly summarizes each of the surveys and projects. (See appendix B for a full description.)

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<sup>1</sup> If a federal employee becomes incapacitated while in a federal position subject to the retirement system and meets the disability eligibility requirements, the employee may apply for a disability retirement. A disability retirement annuity is a benefit provided to protect an employee who is no longer able to provide useful and efficient service because of a medical condition.

<sup>2</sup> A survivor benefit occurs when an eligible spouse or child is paid a portion of the annuity after the retiree dies.

<b>RETIREMENT SERVICES ELIGIBILITY SURVEYS AND PROJECTS</b>	
<b>Survey(S)/Project(P)</b>	<b>Description</b>
<b>Disability Earnings (S)</b>	Entire population of disability annuitants under age 60 is surveyed annually to identify annuitants that have exceeded the earnings threshold. Benefits are reduced when earnings exceed the threshold.
<b>FERS Annuity Supplement Earnings (S)</b>	Entire population of non-disability annuitants who retire before age 62 and receive the FERS Annuity Supplement is surveyed to identify annuitants that have exceeded the earnings threshold. Supplement benefits are reduced or terminated when earnings exceed the threshold.
<b>Marital Status Certification (S)</b>	Survivor annuitants under age 55 who were married to the deceased annuitant for less than 30 years are surveyed annually to identify and terminate benefits for survivors that remarried before age 55.
<b>Representative Payee (S)</b>	Representative payees receiving benefits on behalf of annuitants, surviving spouses, and disabled dependents are surveyed every 2 years to confirm the beneficiary is still living, the payee is still the payee of record, and the annuity is being used in annuitant's best interest.
<b>Student Certification (S)</b>	Surviving dependents ages 18-22 receiving monthly annuity benefits are surveyed to confirm full-time enrollment in a qualifying educational program.
<b>Centenarian (P)</b>	Letters are sent to batches from a Master List of annuitants age 99 and over to confirm their living status and continued eligibility to receive benefits.
<b>Over 90 (P)</b>	Letters are sent biannually to a sample of 2,500 annuitants age 90-98 to confirm their living status and continued eligibility to receive benefits.
<b>Death Data Match (P)</b>	The entire population of annuitants is matched against government death records to identify unreported deceased annuitants, which results in suspension of the annuity and issuance of a letter to inform the annuitant of the suspension and request additional information.

According to RS staff, once the surveys and letters are returned, branch staff screen the response for completeness and update records. These surveys and projects are used to identify accounts that should be suspended or dropped. For each suspended account, RS performs additional follow-up by sending letters and/or emails to the annuitant to alert them of the suspension and providing information on how to rectify or dispute the determination. Once an account is dropped, RS will perform no additional outreach. Both suspended and dropped accounts will not have funds dispersed from the Retirement Trust Fund.

# RESULTS OF EVALUATION

This section details the results of our evaluation of OPM's efforts to identify and prevent improper payments. RS provided evidence supporting their efforts to confirm eligibility of benefits and mitigate improper payments through retirement eligibility surveys and projects. However, we identified the following opportunities for improvement.

## **1. Electronically Administered Surveys and Projects Needed**

We identified an opportunity to enhance efficiency by the electronic administration of all surveys and projects that, if executed, could better deploy resources and prevent improper payments. We consider this a critical area and at least a contributor to the subsequent findings noted in this report.

As of April 2025, the Disability Earnings Survey was the only survey or project administered electronically through OPM Retirement Services Online (SOL), a website used by retirees and families to manage federal retirement annuities. The remaining seven surveys and projects were administered manually, which consists of paper printing, mailings, and processing returned mailings of hardcopy surveys, letters, and other documentation. According to the FERS Annuity Supplement Earnings Survey and Over 90 Project reports in 2023, moving from paper surveys and automating a management tool will help reduce the manual process and improve processing and customer service. Further, we considered the U.S. Social Security Administration's (SSA) practices an industry standard due to the similarities with RS related to representatives requesting and customers providing information and documentation for processing. According to SSA's website as of April 2025, they released an online service option allowing SSA representatives to electronically request and customers to electronically submit forms and evidence, thereby eliminating the need to mail, fax, or deliver information to a local SSA office.

During our meetings, RS officials stated there have been discussions about automating other surveys and projects. Continuation of these manual practices required significant staff hours and increased the risk of delays.

### **Marital Status Certification Survey**

The 2022 Marital Status Certification Survey Report produced by RS noted the following:

- The initial 9,045 surveys were scheduled to be mailed in November 2023; however, after several delays due to technical and printing issues, they were sent in January 2024 (a nearly 2-month delay).
- A statement by the project leader repeating a recommendation for an automated submission option (that is, SOL) to improve the response and services provided to the survivor population.

- The data entry and mailing actions are still a manual process, and “the manpower used to complete the data entry process would be significantly decreased making it more cost effective while also significantly increasing the customer service experience and decreasing improper payments and overpayments.”

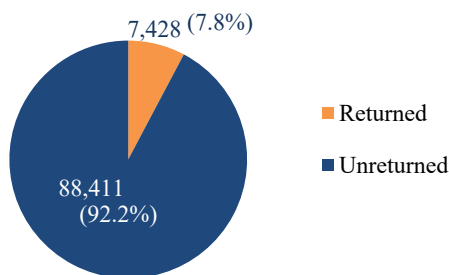
Also, we would note that RS mailed a second hardcopy survey to 1,222 non-responders to avoid suspension of these non-responders, requiring additional effort and resources to manually process these additional surveys.

**FERS Annuity Supplement Earnings Survey**

During walkthroughs, RS officials explained they manually administer the survey to the entire population of annuitants receiving the supplement, but annuitants are not required to return the survey if they earned less than the Minimum Level of Earnings (MLE) in the previous year. The FERS Annuity Supplement survey must be returned by June 30 of every year to adjust benefits by July 1, as needed. Every October (after the survey period ends), RS performs an interagency match against the SSA Master Earnings File for all annuitants receiving the FERS supplement whether annuitants reported any earnings on the survey. When the result of the match shows an annuitant exceeded the MLE, RS communicates with the annuitant and adjusts benefits as needed, which includes recouping any improper payments that occurred between July 1st and completion of the match in October.

According to an RS data tracking spreadsheet, RS sent this survey to 95,839 annuitants in 2023, and 88,411 (92.2 percent) surveys were not returned.

2023 FERS Annuity Supplement Earnings Survey: Returned vs Unreturned Surveys



Source: OIG Analysis

In addition to the unreturned surveys, we found that for 1,993 of the 7,428 (26.8 percent) returned surveys, annuitants reported earnings under the MLE, in which a returned survey was not required. According to RS officials, all returned surveys are manually processed and entered into the RS system of record. In our view, because most mailed surveys were not returned and SSA data indicates that the majority did not need to be returned, the

additional resources and staff hours spent manually administering this survey would be better utilized by administering it electronically.

**The Centenarian Project**

In addition to greater project efficiency, electronic administration of the Centenarian Project may help avoid reputational damage to RS and OPM. According to the Centenarian Project SOP,

annuitants not residing in a nursing facility or being cared for at home by a family member must provide a current photo of the annuitant holding a current newspaper. In our opinion and based on public reporting<sup>3</sup> describing the resemblance of the photo to a “hostage,” this requirement could be considered insensitive and undignified, thereby negatively affecting the reputation of RS and OPM. If RS continues to require current photos of the annuitant to verify their living status, transitioning to electronic submission of the photo in place of the annuitant holding a newspaper could provide RS with the photo’s underlying metadata<sup>4</sup> to identify date, time, and location, negating the need for a current newspaper to be held in the photo.

Additionally, RS officials stated there were two full-time equivalent employees performing the Centenarian Project as a collateral duty. These two employees were working from a Centenarian Project Master List dating back to October 2020 of annuitants age 99 and above. According to our analysis of the Master List spreadsheet, as of May 2025, RS had not resolved<sup>5</sup> 3,910 of 10,330 (37.9 percent) annuitant cases. Administering this project electronically could position RS to produce more with limited resources to prevent improper payments.

OPM leadership has made it a priority to “modernize and digitize the federal retirement process.” In our opinion, this modernization should include RS administering all surveys and projects electronically. This electronic implementation could result in the following benefits, some of which were reportedly realized by the SSA:

- Speeding up processing
- Expanding service options for people with disabilities and people in rural communities
- Improving regular communication with and notices to annuitants
- Saving on the cost of mailing printed surveys and letters
- Improving document security and retention
- Better safeguarding of personal information

### **Recommendation 1**

We recommend the Deputy Associate Director of RS establish a plan of action with milestones to administer all surveys and projects electronically.

### **Management Comments:**

“OPM concurs with this recommendation.” RS will collaborate with the Office of the Chief Information Officer (OCIO) to implement the electronic administration of all surveys. RS notes there are several competing initiatives currently underway, in particular the transition of all

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<sup>3</sup> OregonLive. (2025, September 6). 100-year-old Portlander to feds who cut off her pension benefits: I’m not dead yet! <https://www.oregonlive.com/portland/2025/09/federal-government-demands-100-year-old-prove-shes-alive-or-lose-pension.html>

<sup>4</sup> Metadata refers to the set of data that provides additional information about an image, such as the creation date and location.

<sup>5</sup> Resolved means that RS determined the annuitant to either be alive or deceased.

Retirement processing to a digital platform, and this initiative will be incorporated into the modernization portfolio.

**OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

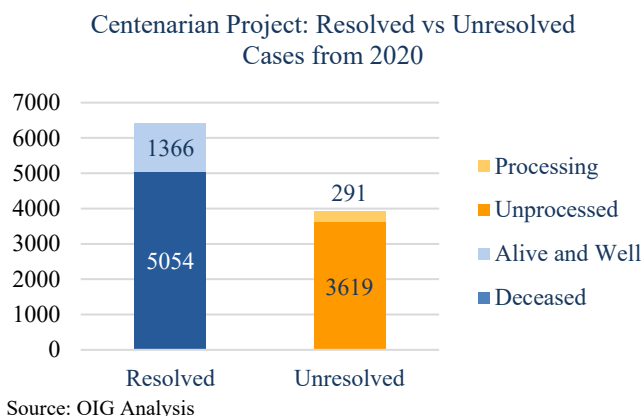
## **2. Current Data and Independent Verification Needed**

We found that RS relied on outdated data to conduct the Centenarian Project. Additionally, RS did not attempt to independently verify annuitant marital statuses for the Marital Status Certification Survey. According to GAO’s Standards for Internal Controls in the Federal Government, Principle 13 – Use Quality Information:

“Management should use quality information to achieve the entity’s objectives. ... Management obtains relevant data from reliable internal and external sources in a timely manner based on the identified information requirements. Relevant data have a logical connection with, or bearing upon, the identified information requirements. Reliable internal and external sources provide data that are reasonably free from error and bias and faithfully represent what they purport to represent. ... Sources of data can be operational, financial, or compliance related. Management obtains data on a timely basis so that they can be used for effective monitoring.”

### **The Centenarian Project**

During our walkthroughs, RS stated they were working from a list of centenarians compiled in 2020 to verify annuitant living statuses in 2025 as part of the Centenarian Project. RS staff had not requested an updated list of annuitants age 99 or over since the original request in 2020, which contained a total of 10,330 annuitants. Based on our analysis of RS’ tracking spreadsheet as of May 2025, RS resolved 6,420 (62.1 percent), and the remaining 3,910 (37.9 percent) were unresolved. The unresolved cases consisted of 291 active cases being processed<sup>6</sup> and 3,619 cases that had not been processed. While progress was made to confirm living status of centenarians during the 5 years, in our opinion, the status of a significant number of centenarians remained unresolved.



<sup>6</sup> Processed means an annuitant had been reached out to via a letter, but RS has not determined a living status. These cases can either be active (receiving annuity payments) or suspended (not receiving annuity payments).

Additionally, RS continued to use a list that excluded annuitants who turned 99 years old after 2020.

## **Recommendation 2**

We recommend the Deputy Associate Director of RS revise standard operating procedures for the Centenarian Project to include securing and using current annuitant data.

### **Management Comments:**

“OPM concurs with this recommendation.” RS will update procedures and collaborate with OCIO to ensure the most recent data is utilized for the project.

### **OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

### **Marital Status Certification Survey**

According to RS officials, the Marital Status Certification survey is a self-certified survey with no independent verification of annuitant marital status. Also, RS officials stated that no reliable independent data source had been identified or was available that covers all marital records from all states or countries. No evidence was provided to support RS’ efforts to pursue reliable external sources to perform independent verification of the Marital Status Certification Survey responses, as was their practice with two other surveys: FERS Annuity Supplement Earnings and Disability Earnings. Solely relying on self-certification can lead to improper payments if the annuitant does not accurately or truthfully identify themselves as remarried, which would render them ineligible for the survivor annuity.

In May 2025, the OPM OIG requested support from the Internal Revenue Service (IRS) to test the accuracy of survivor annuitants that continued to receive annuities based on their self-certified survey response. Specifically, we were attempting to identify survivor annuitants with a tax filing status of “married” and statistically project to the universe of survivor annuitants in 2022 who continued to receive benefits in 2023 based on their self-certified survey. At the time of this report, our efforts are ongoing. In our opinion, absent better sources of data, RS could benefit from pursuing and using IRS tax filing data to verify accuracy of survivor annuitants’ marital status. Similarly, we echo the following statement mentioned in the SSA OIG’s Informational Report, Preventing, Detecting, Recovering Improper Payments, dated July 2024, which states, “Obtaining data that assist with making eligibility and payment determinations from external sources, such as other federal and state agencies and financial institutions, is critical to preventing and detecting improper payments.”

**Recommendation 3**

We recommend the Deputy Associate Director of RS pursue third-party data sources (federal and/or state) to confirm the marital status of survivor annuitants.

**Management Comments:**

“OPM concurs with this recommendation.” RS will explore potential improvements, contingent upon available resources, system connectivity, and difficulty in implementation.

**OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

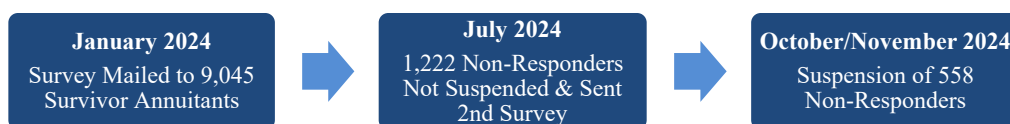
**3. Untimely Suspensions**

We found instances where RS did not comply with suspension timeframes prescribed by RS’ SOPs and on RS surveys and letters sent to annuitants. It should be noted that determining and establishing the appropriate time to suspend payments to avoid improper payments is RS management’s function and decision. We tested for compliance with their decisions as reflected in established procedures at the time of this evaluation. RS staff explained that suspension of annuitant accounts is an important tool for preventing improper payments since no money is disbursed to an annuitant when the account is suspended. However, in our opinion, suspensions must be timely to maximize effectiveness of curtailing improper payments.

**Marital Status Certification Survey**

RS did not follow their procedures to suspend survivor annuitants that did not respond to the 2022 Marital Status Certification Survey. According to the Marital Status Certification Survey SOP, “The Marital Survey takes place annually in May and runs through December. ... As of the close of the survey, all members of the population who did not [provide] a response are subsequently placed in a suspense status ... .”

However, as previously mentioned, the 2022 Marital Status Certification Survey was delayed and mailed on January 12, 2024. According to the Marital Status Certification Survey Report, Survey Year 2022, there were 1,222 of 9,045 (13.5 percent) survivor annuitants that did not respond to the survey sent on January 12, 2024. Rather than suspending these accounts, RS decided to mail a second survey to these non-responders. RS performed the second mailing of surveys in July 2024, which was 8 months after RS’s planned initial mailing in November 2023.



Of the 1,222 survivor annuitants sent a second survey, 558 did not respond, and ultimately, RS suspended the accounts over the two-month period of October and November 2024. Delaying suspension from July 2024 to the period of October to November 2024 increased the risk of prolonged provision of improper payments for those additional 3 to 4 months. Based on the Marital Status Certification Survey Report, Survey Year 2022, 16 of the 1,222 survivor annuitants that were sent a second survey in July were dropped due to a reported remarriage. All but one of these annuitants received 1 to 2 months of overpayment due to the delayed suspensions, which amounted to \$19,084 based on amounts from the Marital Status Certification Survey Report.

Furthermore, RS’ SOP states, “Survey forms that are returned to the office as undeliverable are suspended immediately.” Based on our analysis of the RS data tracking spreadsheet for the 2022 Marital Status Certification Survey, we found that RS suspended 90 undeliverable surveys on or after May 3, 2024. These suspensions occurred 112 days after the survey mailing date of January 12, 2024.<sup>7</sup>

**Over 90 Project**

RS did not follow their procedures to suspend annuitant accounts when letters for the Over 90 Project were returned as undeliverable or not returned. According to the Over Age 90 Project SOP:

- “All letters undeliverable or no response will be suspended,” and
- “All letters must be returned within 30 days from the date of the letter or the case will be suspended ... .”

**Over 90 Project: Suspension Times for Non-Responder Annuitant Accounts**



Source: OIG Analysis

Based on our analysis of the RS data tracking spreadsheet for the 2023 Over 90 Project, we found that letters for 130 of 2,499 (5.2 percent) cases were returned as undeliverable and eventually suspended. However, on average, the suspensions occurred approximately 215 days after the mailing dates, between July 28, 2023, and August 25, 2023. Also, we found that for all 190 of 2,499 (7.6 percent) cases that RS suspended, suspension times ranged from 174 days to 310 days.

Rather than suspending cases due to no response to the initial letters sent between July 28, 2023, and August 25, 2023, RS management decided to send a second letter on February 19, 2024, to

<sup>7</sup> Due to issues with document retention, we could not determine when the survey was returned as undeliverable and the data provided did not report that data point.

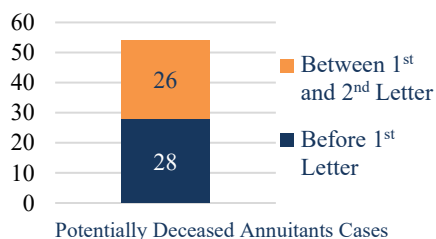
559 non-responders. According to RS staff, RS management decided not to suspend these accounts because of the large number of annuitants that did not respond to the first letter.

As a result of RS’ delays in suspending accounts, we identified cases that remained active for an extended period despite the evidence of potentially deceased annuitants receiving benefits. Specifically, based on the RS data tracking spreadsheet provided on May 13, 2025, there were 284 cases that remained “active” (not suspended) for over 300 days as of June 20, 2024 (the latest date on the RS provided report) with no response from the annuitant. The increased delay in RS following through with suspensions leads to an increased risk of improper payments. Further supporting the need for timely suspension, we found that for 52 suspended accounts for which the annuitant subsequently provided proof of living status, it took an average of less than one day for RS to restore benefits.

In addition, we tested the 490 cases of annuitants who did not respond to either of the two letters (and were not undeliverable) by performing an online obituary search using annuitant personally identifiable information (PII) (for example, name, date of birth, etc.) to identify any open-source evidence detailing the living status of these annuitants. We found online obituaries associated with 54 of 490 (11.0 percent) annuitants that did not respond to the first letter but were potentially deceased before RS mailed the second letter. In these cases, the obituaries indicated individuals with PII matching the annuitants were deceased before RS mailed the second letter. During the fieldwork stage of this evaluation, we sent RS a list of these potentially deceased annuitants for follow-up. The charts below show the results of our online search for potentially deceased annuitants, when these deaths occurred, and the number of possible improper payments made based on the 2023 Over 90 Project letter mailings.

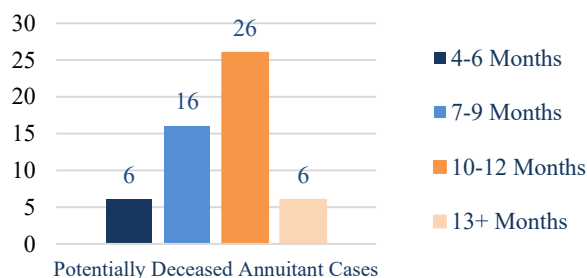
### 2023 Over 90 Project

Non-Response to Both Letters Found to be Potentially Deceased



Source: OIG Analysis

Months of Possible Improper Payments Based on Length of Potential Death



Source: OIG Analysis

#### **Recommendation 4**

We recommend that the Deputy Associate Director of RS establish internal controls to ensure compliance with established suspension timeframes described in RS Standard Operating Procedures.

#### **Management Comments:**

“OPM concurs with this recommendation.” RS notes current SOPs need to be updated to account for recent changes to the process and mentions that delays in suspension have not followed SOPs due to delays in retrieving necessary documentation for continued eligibility.

#### **OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

### **4. Surveys and Projects Not Conducted at Prescribed Frequencies**

While RS conducted all other surveys and projects consistent with the frequencies prescribed in SOPs, the Representative Payee Survey and Death Data Match Project were not. Specifically, we found that RS has not conducted the Representative Payee Survey since 2019. According to the SOP for the Representative Payee Survey, this survey should be conducted on a bi-annual basis (every 2 years). The purpose of the Representative Payee survey is “To identify the living status of representative payees, annuitants and survivors; to ensure benefits are being used for the wellbeing of the intended recipient of payments; and to prevent potential improper payments to individuals no longer serving as representative payees.”

The Death Data Match Project did not proceed with SSA data in 2024. According to the Death Data Match SOP, this project should be conducted semimonthly (twice per month). RS officials stated they decided at the end of 2023 to switch from using SSA data in favor of data provided by the U.S. Department of the Treasury. We confirmed that the Death Data Match Project restarted in 2025 using U.S. Department of the Treasury data.

Noncompliance with prescribed frequencies for conducting surveys and projects increases the risk of improper payments being paid to ineligible annuitants and representative payees.

#### **Recommendation 5**

We recommend the Deputy Associate Director of RS establish internal controls to ensure the Representative Payee Survey is conducted consistent with the frequencies prescribed in RS standard operating procedures.

### **Management Comments:**

“OPM concurs with this recommendation.” RS is currently seeking approval of a new official form letter from the Office of Management and Budget. As soon as approval is received, RS will conduct the Representative Payee survey.

### **OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

## **5. Updated Standard Operating Procedures Needed**

While RS had detailed SOPs on file for each survey and project describing the actions and timing RS staff should perform to confirm eligibility, we found that SOPs for the Student Certification Survey, the Over 90 Project, and the Centenarian Project need revisions to improve consistency and clarity.

### **Student Certification Survey**

We determined that the SOP for the Student Certification Survey did not specify forms acceptable for certification to prove students met eligibility requirements for survivor benefits. We reviewed the regulations governing the annuity benefit for an adult child enrolled in school and receiving the annuity. Specifically, 5 Code of Federal Regulations §831.672 states the following:

- “OPM must receive certification, in a form prescribed by OPM, that the child is regularly pursuing a full-time course of study in an accredited institution.”
- “OPM may periodically request the recipient of a child's annuity payments to furnish certification of school attendance. The certification must be completed in the form prescribed by OPM.”
- “If OPM requests the recipient of a child's annuity payments to provide a self-certification of school attendance, the recipient must complete and sign the certification form.”
- “If OPM requests the recipient of a child's annuity payments to provide a certification by the school, the certification must be signed by an official who is either in charge of the school or in charge of the school's records.”
- “OPM will accept a facsimile signature of a school official only if it is accompanied by a raised seal of the institution or other evidence clearly demonstrating the authenticity of the certification and making unauthorized use of the signature stamp unlikely.”

Based on our analysis, we found that the Student Certification Survey SOP included step by step instruction on how RS staff should process cases in their systems. However, the SOP lacked clarity on required details and adjoining documentation that RS officials processing the cases should review to make their determination on providing or continuing benefits. This could lead to inappropriate provision and continuation of benefits and increase opportunities for improper payments.

### **Over 90 Project**

According to RS officials, when the Over 90 Project survey began, RS selected about 100 people from each age from 90-99 and everyone over 100. The current SOP for the Over 90 Project states that of the total identified population, RS randomly selects “150 annuitants from ages 90-99 and 1,000 annuitants age 100 and over to derive a sample size of 2500 annuitants.” However, in 2021, the sample selection process changed. RS now selects annuitants who are ages 90-98 for this project, and ages 99 and older are included as part of the Centenarian Project.

### **Centenarian Project**

We found inconsistencies between steps noted in the Centenarian Project SOP and RS’ process described during our walkthroughs. The SOP states if there is an indication the annuitant is deceased through the Voluntary Agency Management System (VAMS), Accurint, and/or open-source data, the case is dropped in their system, and a death certificate is requested from the state vital records office. However, during our walkthroughs, RS officials stated they suspend the account if they suspect the annuitant is deceased, and suspended cases are still “worked,” while dropped cases are not.

Additionally, RS officials asserted that “if fraud is found they will report it by writing it up and letting the OIG Office of Investigations determine if there is fraud or not.” However, SOPs for all surveys and projects lacked guidance on when and how referrals to the OIG Office of Investigations for formal investigation should be exercised. Conversely, according to SSA’s operations manual, referral of centenarian cases to their OIG is mandatory when fraud is suspected at any time or when benefits are suspended for any reason to ensure program integrity. Again, we considered SSA’s practices an industry standard worthy of consideration. According to OIG Office of Investigations officials, timely referral of potentially fraudulent cases to the OIG is especially important due to the statute of limitations to seek remedies through the U.S. courts.

### **Recommendation 6**

We recommend the Deputy Associate Director of RS ensure all SOPs for surveys and projects are reviewed and updated to reflect current practices and specify the forms and documentation required to prove eligibility.

**Management Comments:**

“OPM concurs with this recommendation.” RS will review all survey and project SOPs and update as needed.

**OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

**Recommendation 7**

We recommend the Deputy Associate Director of RS update the Centenarian Project SOP to include procedures for when to suspend or drop an account if a possible death is discovered.

**Management Comments:**

“OPM concurs with this recommendation.” RS will include guidance on suspend or drop actions in the revised Centenarian Project SOP.

**OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

**Recommendation 8**

We recommend the Deputy Associate Director of RS coordinate with OIG Office of Investigations leadership to develop and establish written policies and procedures related to referring centenarian cases to OIG.

**Management Comments:**

“OPM concurs with this recommendation.” RS welcomes the opportunity to collaborate with the OIG on this project, while maintaining responsibility for the project.

**OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.” We emphasize the importance of coordinating with the OIG Office of Investigations to formalize the referral process and ensure timely referrals to the OIG.

**6. Additional Opportunities to Improve Projects Associated with Highest-Risk Populations**

As mentioned, RS performed the Over 90 and Centenarian Projects to retrieve proof of life and mitigate improper payments related to these high-risk populations. While these projects were a

proactive means of identifying and preventing improper payments related to these populations, we found additional opportunities to improve both projects.

### **Over 90 Project**

The Over 90 Project began in 2009 and was initiated based on a past OPM OIG recommendation. This project is performed every two years by contacting a sample of the overall population of annuitants aged 90-98, which in 2009 totaled 125,000.<sup>8</sup> According to the Over 90 Project data spreadsheet, there were a total of 305,298 annuitants aged 90-98 in 2023. We found that RS selects a sample of approximately 2,500 cases to confirm annuitant living status each time this project is performed, which represented less than one percent of the entire population of 305,298 annuitants in 2023. When the project began in 2009, the OIG agreed to this sample size as a start. However, since 2009, the overall population increased while the sample size remained. The sample size may not be statistically relevant to the total population or large enough to meaningfully identify improper payments due to unreported deaths.

### **The Centenarian Project**

In addition, the Centenarian Project SOP states that VAMS, Accurint, and various open-source obituary websites (for example, legacy.com, obituary.com, Google Search) are reviewed for existing death reports. However, the results of our analysis call into question RS' effort to use these tools to investigate cases. Specifically, we identified an annuitant on the Centenarian 2020 list who was suspended in 2022 after two letters were returned as undeliverable. As previously mentioned, RS staff stated that suspended cases are still "worked" to determine the annuitant's living status. However, we found an online obituary of an individual noting a death in October 1996 with matching PII (for example, name and date of birth) to the annuitant. Our Office of Investigations then requested a death certificate from the annuitant's state health department and confirmed the October 1996 death date. As a result of RS not properly working and identifying this death, approximately 26 years of potential improper payments totaling approximately \$487,000 were made. During this evaluation, we notified RS of this case and requested an official referral to our Office of Investigations for a formal fraud investigation and to pursue recoupment of any improper payments.

### **Recommendation 9**

We recommend the Deputy Associate Director of RS establish a plan of action with milestones to revise and implement the Over 90 Project's sampling methodology, ensuring the selected sample size is statistically relevant to the total population.

### **Management Comments:**

"OPM concurs with this recommendation." While RS agrees with the need to overhaul the

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<sup>8</sup> An OPM OIG audit report titled Stopping Improper Payments to Deceased Annuitants ([1K-RS-00-11-068](#), September 14, 2011), noted 125,000 annuitants on the roll in September 2009.

current sampling approach, limited resources will constrain the enhancement of this process. However, RS plans to incorporate this new sampling process into its broader modernization initiative.

**OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

**Recommendation 10**

We recommend the Deputy Associate Director of RS establish internal controls to ensure research and review of available systems and open-source sites are performed as noted in the existing Centenarian Project SOP.

**Management Comments:**

“OPM concurs with this recommendation.” RS uses the Do Not Pay Portal’s Death Reporting Confidence Scoring Tool, which assesses the risk of a particular death notice. RS will continue to work with the Department of Treasury to improve this tool, as well as work with OCIO and other OPM components to gain access to open-source sites.

**OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.” While the OIG acknowledges management’s concurrence, we believe it is important to clarify our position regarding certain details in management’s response. As noted in our findings, there appears to have been a lack of consistent commitment to leveraging open-source resources—such as conducting basic internet searches—to identify annuitant deaths. This gap has contributed to delays in detecting and addressing improper payments. Implementing the recommended internal controls would help ensure a systematic approach to mitigating these lapses, thereby improving the identification of annuitant deaths under the Centenarian Project and ultimately enhancing the project’s overall effectiveness.

**Recommendation 11**

We recommend the Deputy Associate Director of RS investigate the potential case of fraud discussed in this finding in coordination with OIG Office of Investigations leadership and pursue recoupment of any identified improper payments.

**Management Comments:**

“OPM concurs with this recommendation.” RS is actively working this case and will share information with the OIG once it becomes available.

### **OIG Comments:**

The OPM OIG finds management's comments responsive to the recommendation and consider the recommendation "Open."

## **7. Lack of Document Retention**

We found that RS was not retaining required documents in the majority of the sampled case files we reviewed. RS survey and project SOPs require the following documents to be retained:

- "All of the forms that required an adjustment to the FERS Supplement are processed in the survey tool and after the close of the survey should be sent to Boyers files." (FERS Annuity Supplement Survey SOP)
- "Check the Survey Response Management System Survey Database and indicate that the form has been received. Document will be filed in case. ... If the survivor is under 55 and married more than 30 years ... No further action will be required. The form will be filed in the case file." (Marital Status Certification Survey SOP)
- "The Project Lead and customer service specialist will manage the spreadsheet and order case files for the letters to be filed in case of letters returned notarized." (Over 90 Project SOP)
- "Upon receipt of the case file, a summary letter is inserted, letting others know why the account has been suspended and/or dropped and by whom. A copy of all documentation related to the review is also placed in the case file to include the living status letter, death certificate, and all supporting documents showing proof of life." (Centenarian Project SOP)
- For the student certification, "Print and maintain in file folder until an update" and "Place the document and return immediately to Open Files." (Student Certification SOP)

To assess document retention practices, we requested a sample of 10 case files from each project and survey for a total of 70 cases. We excluded the Representative Payee survey because it was not conducted during the evaluation period. We received 63 case files for review—5 Death Data Match case files, 1 Marital Status Certification case file, and 1 Centenarian case file were not available for our review in a timely manner. We further excluded the Death Data Match case files because this match had only recently resumed and the necessary documentation was not yet available in the case files. For the remaining 6 surveys and projects, we reviewed 58 case files. Our review specifically examined whether the required document—survey, letter, form, or other

material as outlined in RS’ SOPs—was properly retained in each of the 58 case files. We found that only 17 of 58 case files (29.3 percent) contained required documents in the case files. The findings are detailed in the table that follows.

### DOCUMENTATION RETENTION TESTING RESULTS

Survey/Project*	Sample Size	Case Files with Required Documents	Case Files Missing Required Documents
<b>Surveys</b>			
2022 Disability Earnings	10	0	10
2023 FERS Annuity Supplement	10	0	10
2022 Marital Status Certification	9	1	8
Student Certification**	10	9	1
<b>Projects</b>			
Centenarian	9	1	8
2023 Over 90	10	6	4
<b>Total</b>	<b>58</b>	<b>17</b>	<b>41</b>

Source: OIG Analysis

\* No case files were reviewed for the Representative Payee and Death Data Match project.

\*\*Documentation could include self-certification enrollment form, survey, or any other documents accepted by RS.

We also reviewed all 68 cases across 7 surveys and projects (excluding the Representative Payee survey) to evaluate RS’ accuracy in determining whether annuitant benefits should be continued, suspended, or dropped. For this case review, we considered source documentation to be either (1) surveys, letters, forms, or other documentation prescribed by OPM RS in SOPs found in case files (as mentioned above) and/or (2) internal RS generated reports. We found the following:

- 25 of 68 cases (36.8 percent) did not have enough source documentation for us to confirm the accuracy of benefit determinations
- 43 of 68 cases (63.2 percent) had enough source documentation for us to assess the accuracy of benefit determinations to continue, suspend, or drop benefits
  - 39 of 43 cases (90.7 percent) decisions were accurate
  - 4 of 43 cases (9.3 percent) decisions were inaccurately determined
    - 1 student certification case did not have documents to prove eligibility
    - 3 Over 90 Project cases had letters noted as not being returned on the report, but there was no record of the account having been suspended

Proper document retention is important to ensure that RS’ decisions have been made accurately and if any issues arise, all actions can be accounted for in the case file. We consider RS case files apart from their broader internal control system to ensure accurate processing of retired and survivor annuitant actions. According to GAO’s Standards for Internal Controls in the Federal Government documentation requirements:

“Documentation is required for the effective design, implementation, and operating effectiveness of an entity's internal control system. ... Management develops and maintains documentation of its internal control system.”

**Recommendation 12**

We recommend the Deputy Associate Director of RS establish internal controls to ensure documentation required to determine benefit eligibility is collected and maintained in compliance with RS procedures.

**Management Comments:**

“OPM concurs with this recommendation.” RS will ensure refresher sessions on “File in Case” procedures occur on a regular schedule as part of their efforts to strengthen internal controls around this process.

**OIG Comments:**

The OPM OIG finds management’s comments responsive to the recommendation and consider the recommendation “Open.”

# APPENDIX A: SCOPE AND METHODOLOGY

We conducted this evaluation in accordance with the Quality Standards for Inspection and Evaluation, December 2020, approved by the Council of the Inspectors General on Integrity and Efficiency.

The objective of this evaluation was to determine the effectiveness of OPM RS' efforts to identify and prevent improper payments to retirement annuitants. We conducted our fieldwork from March 2025 through September 2025 at OPM headquarters located at the Theodore Roosevelt Building in Washington, D.C. The scope and corresponding results of this evaluation were based on retirement eligibility data and activity that occurred at various times throughout fiscal years 2022 through 2024.

As part of the planning phase of this evaluation, we met with RS officials responsible for management and administration of RS efforts to mitigate improper payments through their eligibility surveys and projects to gain an understanding of the current state of their efforts and activities. Specifically, we interviewed RS officials from the following branches to determine their roles and responsibilities:

- Retirement Surveys and Students
- Quality Assurance
- Retirement Services Information Technology Program Management Office
- Retirement Inspections
- Fraud Branch

To meet our objective, we performed the following procedures:

- Reviewed and analyzed applicable laws and regulations, prior reports, studies, and other documentation to identify leads and areas of concern
- Interviewed RS officials to gain an understanding of processes and methods used to:
  - Generate the populations of annuitants associated with each survey and project
  - Send, receive, process, and verify responses
  - Make determinations on benefits eligibility
  - Suspend, drop, and reinstate an annuitant's benefit
- Analyzed SOPs associated with each RS retirement eligibility survey and project and compared them to current practices, focusing on timely suspension and dropping of accounts to mitigate overpayments

- Selected a judgmental sample of annuitants from RS surveys and projects (except the Representative Payee survey and the Death Data Match project) and tested for accuracy of eligibility determination and document retention
- Tested accuracy of annuitant survey and project responses using third-party data (including open-source internet sources), timeliness of processing by RS, and effectiveness of internal controls

We determined the data we used to support the findings, conclusions, and recommendations was sufficiently reliable. The evidence obtained provides a reasonable basis for our findings and conclusions based upon our objective.

## APPENDIX B: RS SURVEYS AND PROJECTS

**Disability Earnings Survey:** RS is required by law to send a form each year to all disability annuitants under the age of 60. RS officially started administering this survey fully electronically in OPM Retirement SOL<sup>9</sup> on February 14, 2025. Annuitants report their yearly earnings and, according to RS staff, the system automatically analyzes the responses to determine the annuitant's continued eligibility and flags any cases that are close to or over the 80 percent earnings limit<sup>10</sup> for review. If the 80 percent limit is reached, annuitants are considered restored to earning capacity and benefits will cease on June 30 of that year. RS verifies survey results through an annual interagency computer match with the SSA's Master Earnings File.

**FERS Annuity Supplement<sup>11</sup> Earnings Survey:** All FERS retirees are eligible for this supplement with some exceptions.<sup>12</sup> Salaries and/or wages the annuitant earns after retirement can affect continued receipt of this benefit, therefore the supplement is subject to an earnings test. Annuitants receiving this benefit are required to furnish their earnings yearly between the annuitant's Minimum Retirement Age (MRA) and age 62 to determine eligibility. An annuitant is not required to return the survey if they earned less than the MLE<sup>13</sup> unless their supplement was reduced in the previous year. RS verifies survey results through an annual interagency computer match with the SSA's Master Earnings File.

**Marital Status Certification Survey:** RS performs an annual mailing of marital surveys to survivors who receive a benefit from a deceased federal employee under either CSRS or FERS. Provisions under both retirement systems require OPM to end a survivor annuity benefit if the survivor annuitant remarries prior to turning 55, unless they were married to the deceased for at least 30 years prior to his or her death.

**Representative Payee Survey:** This biannual survey is sent to payees<sup>14</sup> that receive benefits on behalf of annuitants, surviving spouses, and disabled dependents who are unable to manage their finances. OPM sends this survey to: (1) ensure the beneficiary is still living, (2) confirm the person receiving benefits on behalf of the annuitant is still the payee of record, and (3) ensure the payee is using the annuity in the best interests of the annuitant.

**Student Certification Survey:** This survey is sent to adult children, aged 18 to 22, of a deceased federal employee or retiree, who are enrolled full time in a qualifying educational program. To

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<sup>9</sup> SOL lets annuitants (retirees or their spouses, ex-spouses, and children) manage their retirement account online.

<sup>10</sup> The 80 percent earning limit is equal to 80 percent of the current salary of the position the individual held before retiring.

<sup>11</sup> This supplement is a component of the FERS benefit and represents what the annuitant would receive from the SSA for their civilian service if he or she was receiving Social Security benefits on the day of retirement.

<sup>12</sup> Exceptions include disability retirees, specific "MRA +10" retirees, deferred retirees, and retirees age 62 and older.

<sup>13</sup> The MLE amount is set by the SSA. In 2024 the MLE was \$22,320.

<sup>14</sup> There are nine categories of representative payees, but only five categories are sent the survey— (1) other representative payee for adult, (2) organization or Institution for adult, (3) non-standard organization or institution for adult, (4) non-standard representative payee, and (5) other non-standard address. The other four categories are reserved for student survivors and disabled adult cases— (1) annuitant or survivor, (2) parent (for use of), (3) other than parent, and (4) legal guardian. These cases usually involve minor children or court designees and are monitored by the courts.

be eligible for the benefit, the adult child/student must maintain full-time enrollment at the educational institution. While these benefits do not start automatically, once the adult child's survivor benefit has been started, every year by law, OPM must confirm the adult child's eligibility to continue the benefit.

**Centenarian Project:** Started in 2020, this project seeks to confirm continued eligibility of the annuitant. This continuous project involves sending out letters to the Master List of annuitants age 99 and over. The letter must be notarized and returned within 30 days to avoid suspension, along with a copy of a valid ID, and a personal photo with a recent newspaper showing the date. RS will remove the annuitant from the rolls if RS confirms they are deceased.

**Death Data Match Project:** According to RS staff, RS initiated this project in 1985 as the result of an OIG Recommendation. This project leverages SSA's Death Master File data against the annuity roll to identify unreported deaths of annuitants. Twice a month, SSA<sup>15</sup> will send a list of newly reported deaths. Upon locating a matching account, RS will suspend the annuity account and issue a letter to inform the annuitant of the suspension and to request additional information.<sup>16</sup>

**Over 90 Project:** According to RS staff, RS initiated this project in 2009 due to an OIG recommendation. This project seeks to confirm continued eligibility of the annuitant by verifying their living status. A sample of 2,500 annuitants from the total population of annuitants age 90-98 is surveyed bi-annually in March.<sup>17</sup> A letter will be sent to annuitants in the sample population, and it must be notarized and returned.

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<sup>15</sup> During the period covered by this evaluation, this information was provided by SSA. Currently, OPM RS is working with the Treasury Department to receive the same data for this Project

<sup>16</sup> Additional information can be a death certificate or other information confirming proof of life.

<sup>17</sup> Prior to 2021, all annuitants aged 90 and over were part of the population sampled. However, currently, annuitants aged 99 and over are included in the Centenarian Project and are no longer included in this survey population.

# APPENDIX C: MANAGEMENT COMMENTS



## UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

### Retirement Services

MEMORANDUM FOR: LARRY R. PRICE JR.  
Lead Auditor, Office of Evaluations  
Office of the Inspector General

FROM: STANLEY McMICHAEL  
Acting Deputy Associate Director, Retirement  
Services – Washington, DC

SUBJECT: Draft Report on the Evaluation of the U.S. Office of Personnel  
Management Retirement Services' Efforts to Identify and Prevent  
Improper Payments (Report Number 2025-OEI-991)

Thank you for providing OPM the opportunity to respond to the Office of the Inspector General (OIG) draft report on the Evaluation of the U.S. Office of Personnel Management Retirement Services' Efforts to Identify and Prevent Improper Payments, 2025-OEI-991.

Responses to your recommendations including planned corrective actions, as appropriate, are provided below.

**Recommendation #1:** We recommend the Deputy Associate Director of RS establish a plan of action with milestones to administer all surveys and projects electronically.

Management Response: OPM concurs with this recommendation.

Retirement Services (RS) will collaborate with our OCIO partners to implement the electronic administration of all surveys. Given the number of competing initiatives currently underway, particularly the transition of all Retirement processing to a digital platform, this initiative has been incorporated into the modernization portfolio and will advance in alignment with the prioritization established by the Director of OPM.

**Recommendation #2:** We recommend the Deputy Associate Director of RS revise standard operating procedures for the Centenarian Project to include securing and using current annuitant data.

Management Response: OPM concurs with this recommendation.

RS will proceed with updating the procedures accordingly. In collaboration with our OCIO partners, we will ensure that the most recent data is routinely secured and utilized.

**Recommendation #3:** We recommend the Deputy Associate Director of RS pursue third-party data sources (federal and/or state) to confirm the marital status of survivor annuitants.

Management Response: OPM concurs with this recommendation.

RS will explore potential improvements, contingent upon available resources, system connectivity, and the level of implementation effort required.

**Recommendation #4:** We recommend that the Deputy Associate Director of RS establish internal controls to ensure compliance with established suspension timeframes described in RS Standard Operating Procedures.

Management Response: OPM concurs with this recommendation.

RS concurs that our current standard operating procedures (SOPs) must be updated to ensure compliance with recent changes. As we continue to serve our current population, delays in retrieving necessary documentation for continued eligibility have impacted our ability to suspend benefits in accordance with existing SOPs.

**Recommendation #5:** We recommend the Deputy Associate Director of RS establish internal controls to ensure the Representative Payee Survey is conducted consistent with the frequencies prescribed in RS standard operating procedures.

Management Response: OPM concurs with this recommendation.

RS will proceed with conducting the survey upon approval of the new official form letter by the Office of Management and Budget (OMB), as required under the Representative Payee Fraud Prevention Act of 2019.

**Recommendation #6:** We recommend the Deputy Associate Director of RS ensure all SOPs for surveys and projects are reviewed and updated to reflect current practices and specify the forms and documentation required to prove eligibility.

Management Response: OPM concurs with this recommendation.

RS will review all standard operating procedures (SOPs) related to surveys and projects and update them as necessary.

**Recommendation #7:** We recommend the Deputy Associate Director of RS update the Centenarian Project SOP to include procedures for when to suspend or drop an account if a possible death is discovered.

Management Response: OPM concurs with this recommendation.

RS will include guidance on suspend or drop in the revised/updated Centenarian Project SOP.

**Recommendation #8:** We recommend the Dupty Associate Director of RS coordinate with OIG Office of Investigation branch leadership to develop and establish written policies and procedures related to referring centenarian cases to OIG.

Management Response: OPM concurs with this recommendation.

RS welcomes the opportunity to collaborate with the OIG on this project. However, we maintain responsibility for the program, as it is administered through our overarching integrity framework.

**Recommendation #9:** We recommend the Deputy Associate Director of RS establish a plan of action with milestones to revise and implement the Over 90 Project's sampling methodology, ensuring the selected sample size is statistically relevant to the total population.

Management Response: OPM concurs with this recommendation.

While RS agrees with the need to revamp the current sampling approach, limited resources constrain our ability to enhance the existing process at this time. However, we will incorporate this effort into our broader modernization initiatives.

**Recommendation #10:** We recommend the Deputy Associate Director of RS establish internal controls to ensure research and review of available systems and open-source sites are performed as noted in the existing Centenarian Project SOP.

Management Response: OPM concurs with this recommendation.

RS's current process incorporates the use of the Do Not Pay Portal's (DNP) Death Reporting Confidence Scoring Tool (DRCST). The Tool utilizes a variety of sources to assess the risk of any particular notification of death. We continue to work with the Department of Treasury in improving DRCST. We will work with OCIO and other OPM components to gain access to open source sites.

**Recommendation #11:** We recommend the Deputy Associate Director of RS investigate the potential case of fraud discussed in this finding in coordination with OIG OI branch leadership and pursue recoupment of any identified improper payments.

Management Response: OPM concurs with this recommendation.

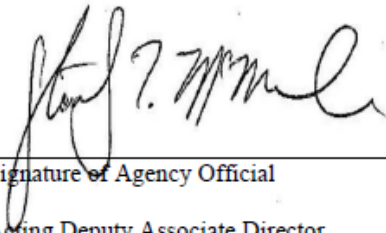
RS is actively working the case in question and will share completed information when it becomes available.

**Recommendation #12:** We recommend the Deputy Associate Director of RS establish internal controls to ensure documentation required to determine benefit eligibility is collected and maintained in compliance with RS procedures.

Management Response: OPM concurs with this recommendation.

RS will ensure that refresher sessions on 'File in Case' procedures are conducted with staff on a regular schedule, as part of our efforts to strengthen internal controls around this process.

We appreciate the opportunity to respond to this discussion draft report. If you have any questions regarding our response, please contact Chonan Bell, Quality Assurance, Retirement Services, 202-936-0432, [chonan.bell@opm.gov](mailto:chonan.bell@opm.gov).



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Signature of Agency Official

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Acting Deputy Associate Director  
Title of Agency Official

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1/8/2026  
Date

