FYs 2020–2021 Agency Priority Goal Action Plan

Improve Supplemental Security Income Payment Accuracy

Goal Leaders:

Goal Leader: Marianna LaCanfora, Deputy Commissioner, Office of Analytics, Review, and Oversight

Deputy Goal Leader: Erik Jones, Assistant Deputy Commissioner, Office of Operations

Overview

Goal Statement and Targets

Improve the integrity of the Supplemental Security Income (SSI) program by focusing our efforts on reducing overpayments (Annual Targets Only).

- By September 30, 2020, achieve an SSI overpayment accuracy rate of 94 percent.
- By September 30, 2021, achieve an SSI overpayment accuracy rate of 94 percent.

Challenge

Our greatest payment accuracy challenge is the SSI program. An SSI recipient's monthly income, resources, and living arrangements affect his or her eligibility and monthly benefit amount. Improper payments (overpayment and underpayment errors) often occur if recipients, representative payees, or deemors[1] fail to report changes timely. Even relatively minor changes can result in an improper payment.

Based on the most recent data in our FY 2019 SSI Stewardship Review (a statistically valid review of the non-medical factors of the SSI program):

- The SSI overpayment accuracy rate was 91.9 percent, totaling projected overpayments of $4.6 billion.
- To improve SSI payment accuracy by about one-tenth of one percent represents about $56.9 million in SSI program payments.

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[1] A deemor is a person (e.g., parent or spouse) whose income and resources we consider when determining a person's eligibility or payment amount for SSI.

Overview

- To meet our overpayment accuracy goal, the agency needs to eliminate about $1.1 billion in improper payments.

Our FY 2019 SSI Stewardship Review identified the following top reasons for SSI overpayment errors:

- <u>Financial Accounts</u>: Financial account-related overpayments averaged $1.15 billion per year and represented 21 percent of the total overpayment deficiency dollars for the 5-year period FY 2015 through FY 2019.
- <u>Wages</u>: Wage-related overpayments averaged $1.14 billion per year and represented 21 percent of the total overpayment deficiency dollars for the 5-year period FY 2015 through FY 2019.
- <u>In-Kind Support and Maintenance (ISM)</u>: Overpayments resulting from ISM, or help from others in the form of food, clothing, or shelter, averaged $578 million per year and represented 7 percent of the total overpayment deficiency dollars for the 5-year period FY 2015 through FY 2019.

Opportunities

We strive to increase our payment accuracy by using more data and technology, including:

- Providing an option for reporting earnings using authority from the Bipartisan Budget Act of 2015, Section 826, "Electronic Reporting of Earnings;"
- Expanding our myWageReport (myWR) management information capabilities to target marketing and increase online wage reporting transactions; and
- Implementing information exchanges with payroll data providers to reduce improper payments as authorized in the Bipartisan Budget Act of 2015, Section 824, "Use of electronic payroll data to improve program administration."

Leadership and Implementation Team

Office of Analytics, Review, and Oversight (OARO)
APG Leadership and Implementation Teams

Leadership Team

Marianna LaCanfora, *Deputy Commissioner (OARO)* Goal Leader
Erik Jones, *Assistant Deputy Commissioner (Office of Operations)* Deputy Goal Leader
Executive Director (OARO) Audits and Improper Payments Prevention Staff
Associate Commissioner (Office of Operations) Office of Public Service and Operations Support

Implementation Team

Division Director (OARO) Improper Payments Prevention Staff
Associate Commissioner (Office of Budget, Finance, and Management) Office of Financial Policy and Operations
Associate Commissioner (Office of Retirement and Disability Policy) Office of Income Security Programs
Associate Commissioner (Office of Operations) Office of Electronic Services and Technology

Goal Structure and Strategies

The SSI Payment Accuracy APG supports the following strategic goal and objective defined in our FYs 2018–2022 Agency Strategic Plan.

- Strategic Goal 3: Ensure Stewardship
- Strategic Objective 3.1: Improve Program Integrity

By focusing on the root causes of improper payments, we plan to:

- Promote all wage reporting options
- Continue utilizing non-home real property commercial records
- Increase data exchange partnerships to obtain income, resources, and data regarding absence from the US

Key indicators of success in our goal progress include:

- Increased timely wage reporting
- Increased identification of countable resources
- Increased awareness of SSI rules and regulations, including situations when an individual leaves the United States and are ineligible for benefits

Goal Structure and Strategies

Implementation Strategies:

- Conduct SSI non-medical redeterminations: To ensure the most cost-effective investment of agency resources, we use an automated method that predicts and identifies cases most likely to incur overpayments. Our estimates indicate that non-medical redeterminations conducted in FY 2020 will yield a return on investment of about $3 on average of net Federal program savings over 10 years per $1 budgeted for dedicated program integrity funding, including SSI and Medicaid program effects.

- Increase timely wage reporting to address a root cause of improper payments and prevent its reoccurrence: SSI recipients, deemors, and representative payees may use the following options to report wages:
    - Mail;
    - Direct contact with our employees via phone or in-person;
    - A mobile application (i.e., SSI Mobile Wage Reporting);
    - A dedicated toll-free number (i.e., SSI Telephone Wage Reporting); or
    - myWageReport (myWR) (located behind the *my* Social Security portal).

Goal Structure and Strategies

- Collection of non-home real property (NHRP) metrics: In FY 2020, we will assess the impact and evaluate the effectiveness of the project on improper payments. We use commercial records as a lead to determine whether an individual owns real property that does not serve as his or her principal place of residence and may be a countable resource. We will collect data to measure the outcomes, based upon suspension or denial of SSI benefits, of this electronic process.

- Collaborate with partners to reduce improper payments: We will pursue additional data through a variety of sources (e.g., payroll providers, financial institutions, information providers, and other federal partners including the Department of Homeland Security) in coming years.

Summary of Progress – FY 2020 Q3

Overall APG Progress

As of the end of the third quarter, we remain on track to meet our SSI wage reporting and SSI non-medical redeterminations targets and completed our milestone.[2,3]

We continue to work with the Department of Homeland Security (DHS) to expand our data exchange to include U.S. citizens. DHS completed backfilling FY 2019 and FY 2020 historical U.S. citizen foreign travel data in the Arrival and Departure Information System (ADIS). DHS expects to complete backfilling of FY 2018 data by the end of August 2020. We will conduct a study to develop protocols for analyzing the reliability of the U.S. citizen foreign travel data once sufficient historical data is available in ADIS.

In June 2020, we completed our evaluation of the effectiveness of NHRP on improper payments. We estimate the present value of the reduction in Federal SSI payments over the entire period of effect (2018–2027) is $155 million. Additionally, we estimated the return-on-investment of completed NHRP matches in FY 2018 to be 19-to-1.

Our primary indicator measures the accuracy of payments to persons receiving SSI benefits by reviewing all non-medical factors of eligibility and payment. We expect our FY 2020 results to be impacted by our decision to suspend overpayment processing and collection to help ensure income and healthcare security for our beneficiaries during the COVID-19 pandemic.

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[2] FY 2020 results are through June 26, 2020, which is the end of the operating month.
[3] Effective March 17, we took steps to protect the public and our employees from COVID-19. At this time, we are still assessing how the COVID-19 pandemic will impact our workload performance ([and hiring] where appropriate)."

Key Milestones

We have identified quarterly milestones to assess our progress toward completing the SSI payment accuracy goal.

Milestone Summary		
Key Milestone	**Milestone Due Date**	**Milestone Status**
FY 2020		
Conduct a root cause analysis of the current online wage reporting failures and implement a systems fix.	Q1	Complete
Formalize a corrective action plan process that will serve as a mechanism for components to document, track, measure, and monitor the timely completion of activities that will help reduce improper payments.	Q2	Complete
Implement refresher myWR application training for field office employees.	Q3	Complete
Increase the number of wage reports we process using all SSI wage reporting options by 2 percent over the FY 2019 annual total.	Q4	On-Track
Complete 100 percent of budgeted non-medical SSI redeterminations for FY 2020.	Q4	On-Track

Key Milestones

Key Milestone	Milestone Due Date	Milestone Status
FY 2021		
Issue a report on the feasibility of expanding the Access to Financial Information searches.	Q1	
Automate an information exchange with a payroll data provider as authorized in the Bipartisan Budget Act of 2015, Section 824.	Q2	
Initiate automated alerts that will prompt employees to review cases with potential SSI entitlement.	Q3	
Complete 100 percent of budgeted non-medical SSI redeterminations for FY 2021.	Q4	
Increase the number of wage reports we process using all SSI wage reporting options by 2 percent over the FY 2020 annual total.	Q4	

Key Indicators

Historical Data

Primary Indicator: SSI Overpayment Accuracy (Annual Targets Only)
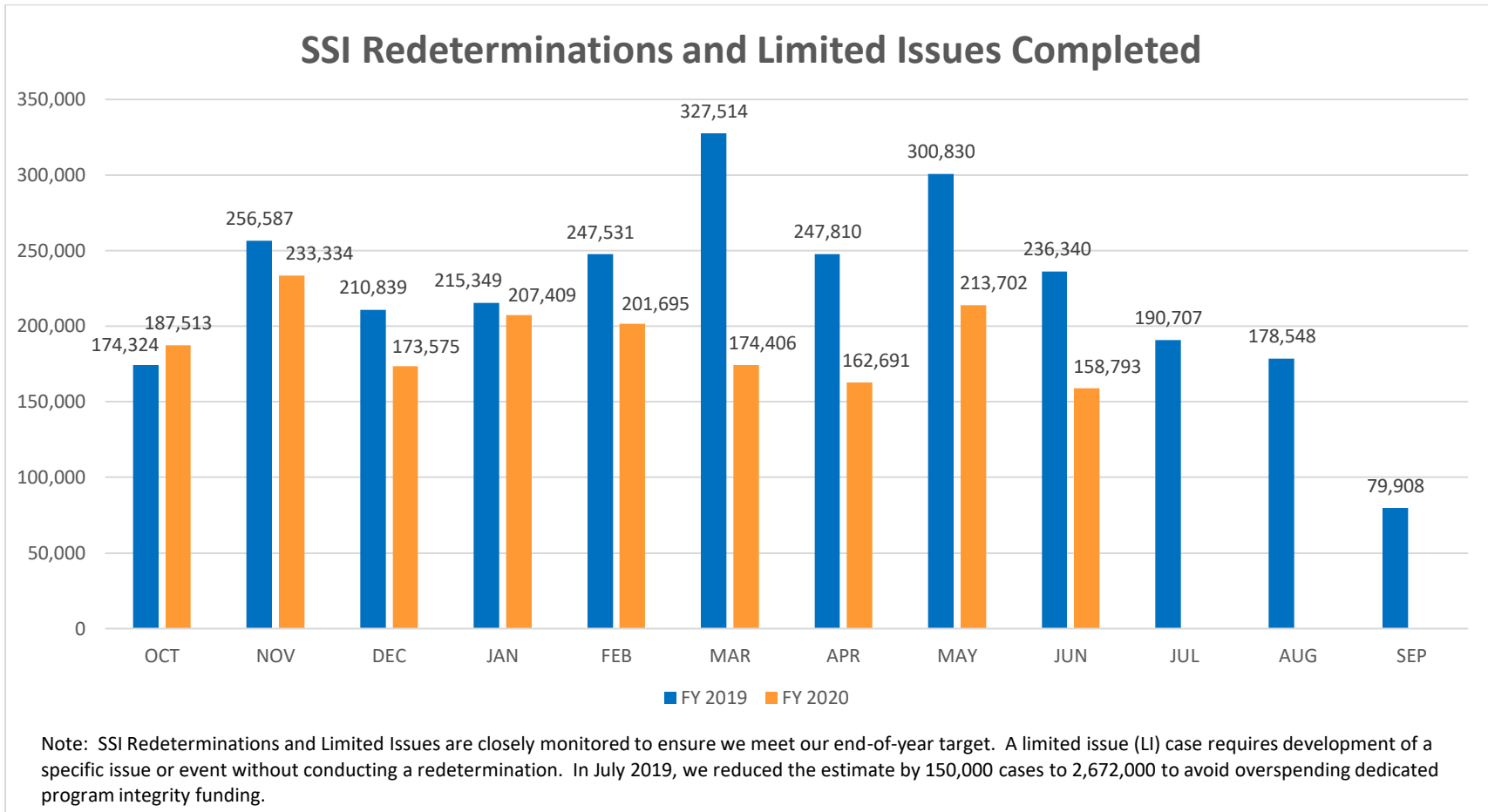
- FY 2020 Target: 94 percent of SSI payments free of overpayment.
- FY 2021 Target: 94 percent of SSI payments free of overpayment.

SSI Overpayment Accuracy

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
SSI Overpayment Accuracy	93.9%	92.4%	92.7%	91.8%	91.9%
SSI Overpayment Target	95.0%	95.0%	94.0%	94.0%	94.0%
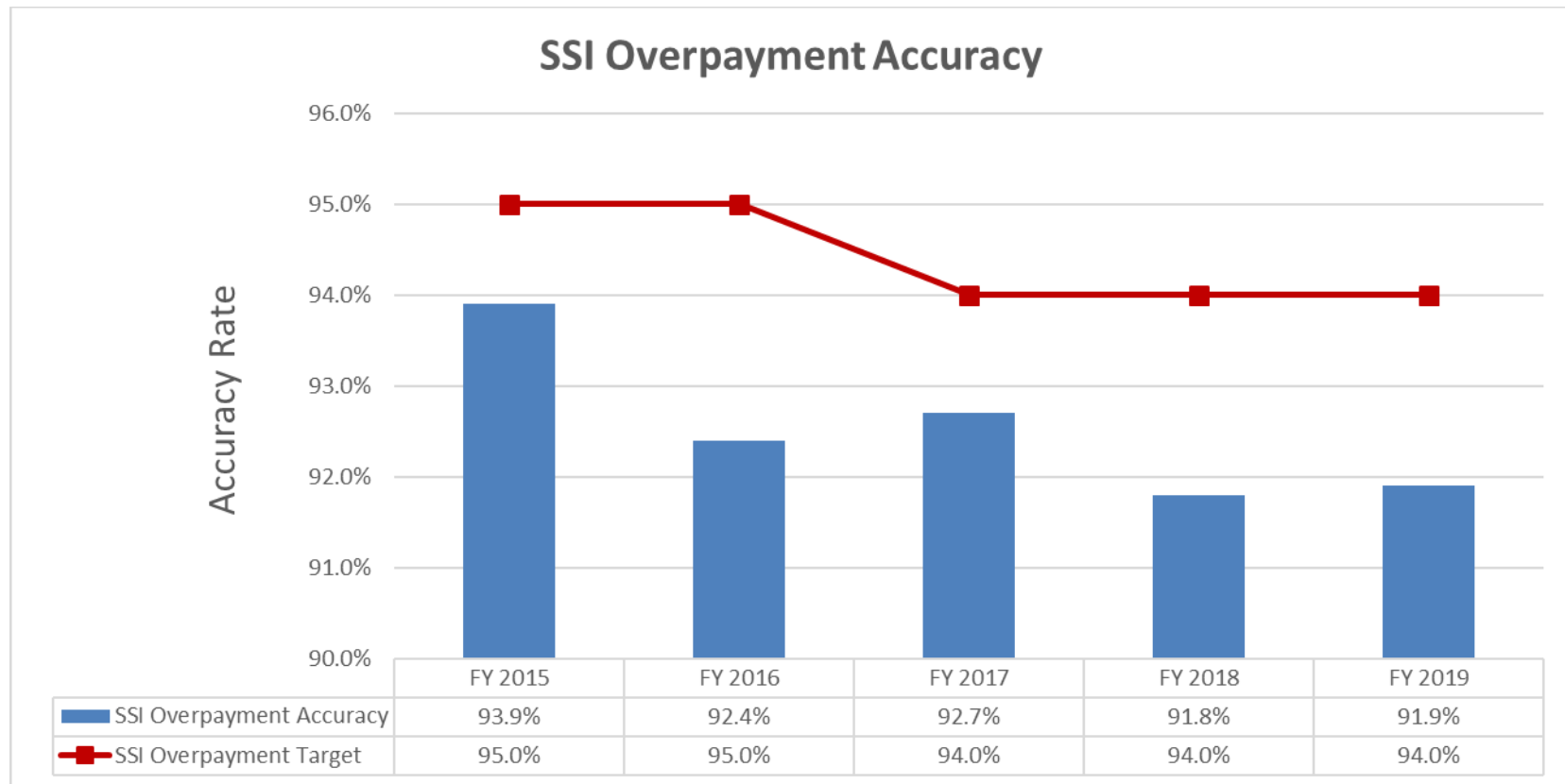
Key Indicators

Secondary Indicator: SSI Non-Medical Redeterminations Completed

- FY 2020 Target: 2,150,000
- FYTD 2020 Results: 1,713,118

SSI Redeterminations and Limited Issues Completed

Month	FY 2019	FY 2020
OCT	174,324	187,513
NOV	256,587	233,334
DEC	210,839	173,575
JAN	215,349	207,409
FEB	247,531	201,695
MAR	327,514	174,406
APR	247,810	162,691
MAY	300,830	213,702
JUN	236,340	158,793
JUL	190,707	
AUG	178,548	
SEP	79,908	

Note: SSI Redeterminations and Limited Issues are closely monitored to ensure we meet our end-of-year target. A limited issue (LI) case requires development of a specific issue or event without conducting a redetermination. In July 2019, we reduced the estimate by 150,000 cases to 2,672,000 to avoid overspending dedicated program integrity funding.
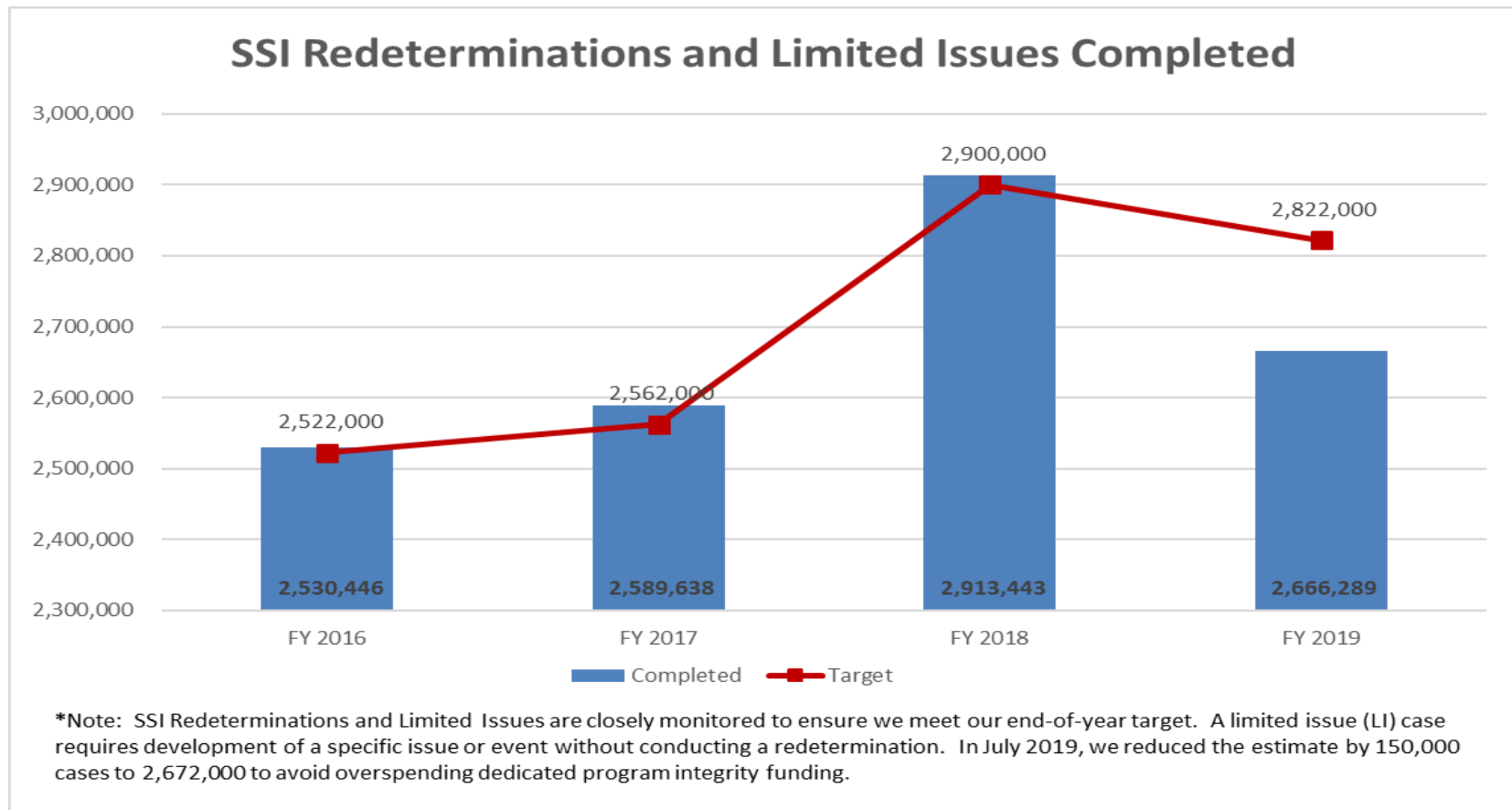
Key Indicators

Historical Data

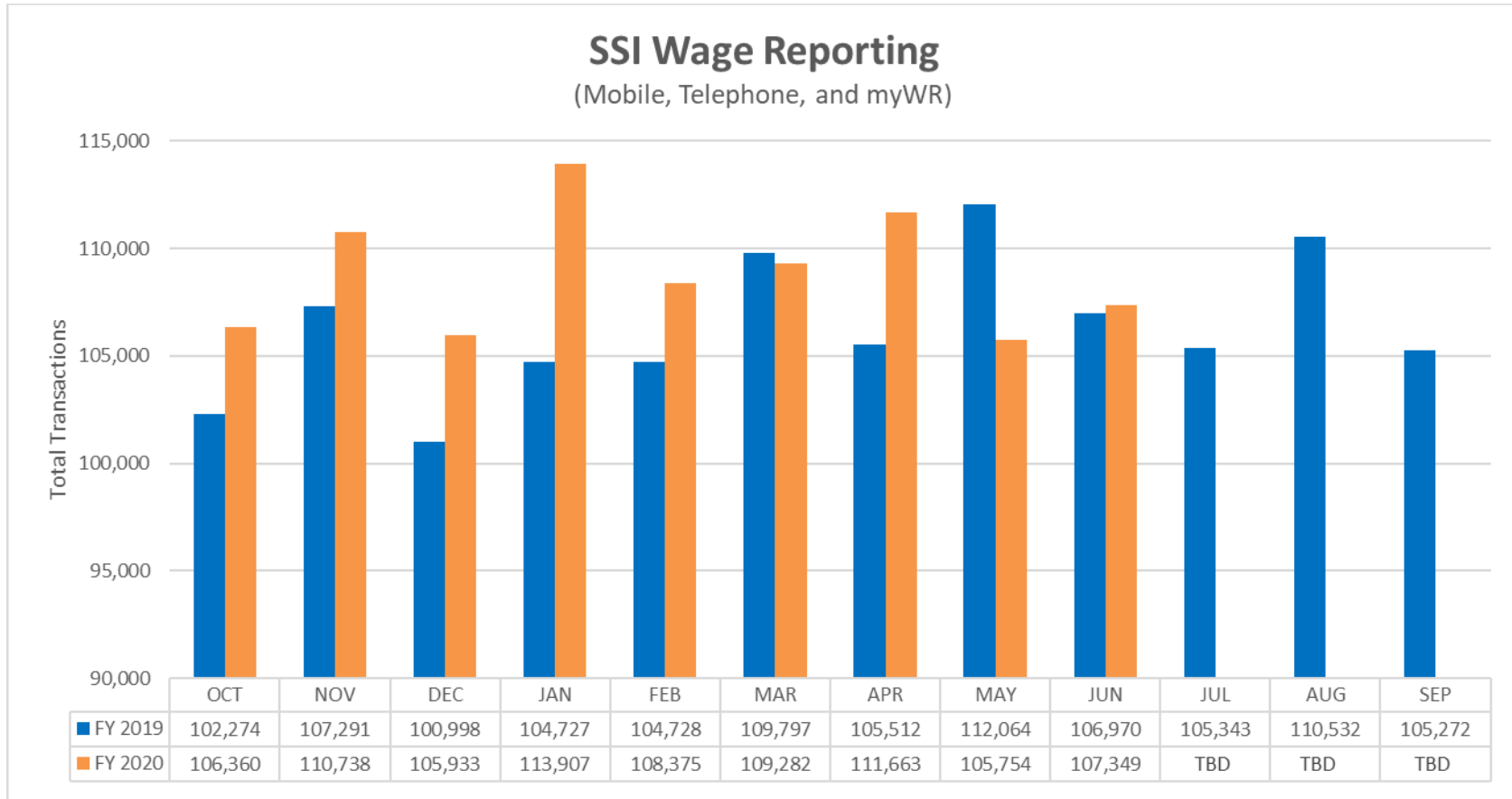SSI Non-Medical Redeterminations Completed:

- FY 2020 Target: Complete 100 percent of budgeted SSI non-medical redeterminations (2,150,000).
- FY 2021 Target: Complete 100 percent of budgeted SSI non-medical redeterminations.

SSI Redeterminations and Limited Issues Completed

	FY 2016	FY 2017	FY 2018	FY 2019
Target	2,522,000	2,562,000	2,900,000	2,822,000
Completed	2,530,446	2,589,638	2,913,443	2,666,289

*Note: SSI Redeterminations and Limited Issues are closely monitored to ensure we meet our end-of-year target. A limited issue (LI) case requires development of a specific issue or event without conducting a redetermination. In July 2019, we reduced the estimate by 150,000 cases to 2,672,000 to avoid overspending dedicated program integrity funding.

Key Indicators

Secondary Indicator: SSI Wage Reporting

- FY 2020 Target: 1,301,018
- FYTD 2020 Results: 979,361

SSI Wage Reporting
(Mobile, Telephone, and myWR)

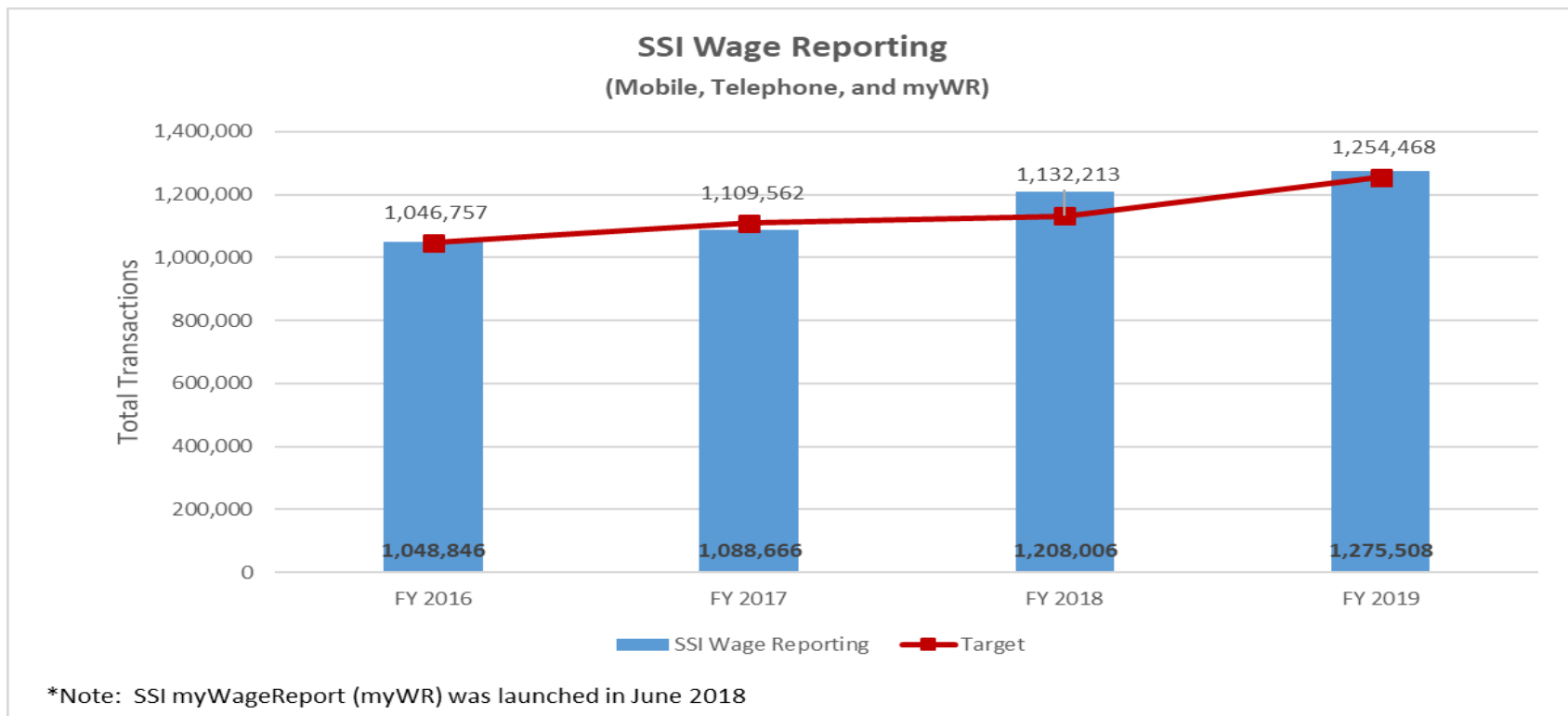|	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
FY 2019	102,274	107,291	100,998	104,727	104,728	109,797	105,512	112,064	106,970	105,343	110,532	105,272
FY 2020	106,360	110,738	105,933	113,907	108,375	109,282	111,663	105,754	107,349	TBD	TBD	TBD

Key Indicators

Historical Data

SSI Wage Reporting:

- FY 2020 Target: Increase the number of total wage reports we process using SSI telephone wage reporting (TWR), SSI mobile wage reporting (MWR), and myWR by 2 percent (1,301,018) over the number in FY 2019.
- FY 2021 Target: Increase the number of total wage reports we process using SSI TWR, MWR, and myWR by 2 percent over the number in FY 2020.
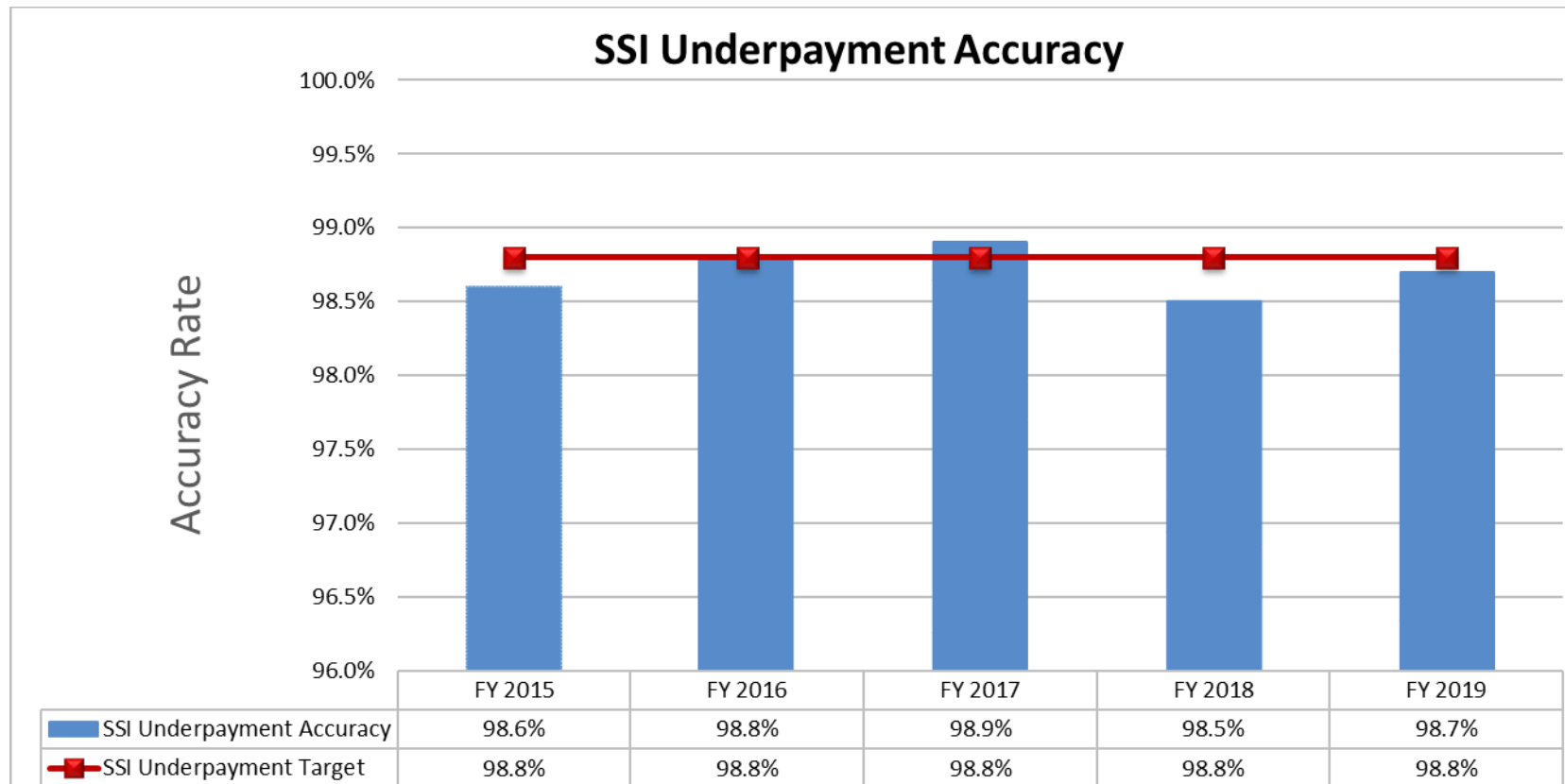

SSI Wage Reporting
(Mobile, Telephone, and myWR)

Target values: FY 2016: 1,046,757; FY 2017: 1,109,562; FY 2018: 1,132,213; FY 2019: 1,254,468

SSI Wage Reporting bar values: FY 2016: 1,048,846; FY 2017: 1,088,666; FY 2018: 1,208,006; FY 2019: 1,275,508

Legend: ■ SSI Wage Reporting ■ Target

*Note: SSI myWageReport (myWR) was launched in June 2018

Key Indicators

Historical Data

Secondary Indicator: SSI Underpayment Accuracy (Annual Targets Only)

- FY 2020 Target: 98.8 percent of SSI payments free of underpayment.
- FY 2021 Target: 98.8 percent of SSI payments free of underpayment.

SSI Underpayment Accuracy

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
SSI Underpayment Accuracy	98.6%	98.8%	98.9%	98.5%	98.7%
SSI Underpayment Target	98.8%	98.8%	98.8%	98.8%	98.8%

Assumptions and Risks

We have identified the following assumptions for accomplishing the goal. We have also identified the following risks that could affect our progress along with mitigation plans to address these risks.

Assumptions
We receive funding for continuation of program integrity activities, including SSI redeterminations.
We report our SSI payment accuracy on an annual basis, which we believe is the most accurate and cost-effective method for such reporting.

Key Risks	Mitigation
Reliance on SSI recipients to timely self-report changes that may affect eligibility or payment amount	We continue to pursue data exchanges to secure data directly and reduce our dependence on SSI recipients to self-report.
SSI program design makes eligibility requirements complex	We continue to propose legislation that would simplify the SSI program and reduce self-reporting requirements.
Limited information technology (IT) resources	We have a sound business process that assesses the viability of IT proposals, ensures they align with our Agency Strategic Plan, and prioritizes our IT investments to use available IT resources.

Data Accuracy and Reliability

The annual SSI Stewardship review is our methodology for determining payment accuracy.

Each year, we report the findings of our SSI stewardship (non-medical payment accuracy) review. These findings provide the basis for SSI payment accuracy reports to monitoring authorities and meet the reporting requirements of the Improper Payments Information Act of 2002, as amended by the Improper Payments Elimination and Recovery Act of 2010, and the Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERA).

SSA's Office of the Inspector General (OIG) conducts an independent audit of our IPERA report each fiscal year. In doing so, we provide OIG with all supporting documentation for information in the SSI stewardship report. OIG has concluded that this information is accurate and reliable.

We also use Stewardship data to identify trends. Those trends, combined with further analysis, are used to identify corrective action plans to reduce improper payments.

Additional Information

Internal Stakeholders:

Improper Payment Oversight Board: The board provides enterprise-wide governance and accountability and serves as the corporate team that: oversees all improper payment related activities for the agency; collaborates and shapes improper payment strategies; resolves cross-component differences; and drives timely results.

External Stakeholders:

Congress: Congress has a continued interest in our efforts to reduce improper payments. Our executive leadership has testified before the House Committee on Ways and Means about our corrective actions to reduce improper payments and increase debt collection.

Claimant Advocacy and Disability Advocacy Organizations: These organizations advocate for the rights of individuals applying for and/or receiving SSI.

The Public: We balance our program integrity responsibilities with our commitment to serve the public and issue timely payments. In FY 2019, the agency paid approximately $58 billion in Federal benefits and State supplementary payments to approximately 8 million SSI recipients on average each month (approximately 2.7 million of whom concurrently receive Old Age and Survivors Insurance or Disability Insurance benefits). We remain focused on the integrity of our programs and minimizing improper payments, which include both overpayments and underpayments.

The Office of Management and Budget (OMB): OMB oversees the implementation of our strategies to reduce improper payments.