

# OTHER REPORTING REQUIREMENTS

## **Payment Integrity**

## **Background**

We take seriously our responsibility to ensure eligible individuals receive the benefits to which they are entitled, and to safeguard the integrity of benefit programs to better serve our customers. Our employees work hard to pay the right person the right amount at the right time. Ensuring program stewardship is one of our three agency strategic goals.

Our program integrity workloads are critical to ensuring efficient programs and accurate payments in our Old-Age and Survivors Insurance (OASI), Disability Insurance (DI) (referred to as OASDI when discussing them in combination), Supplemental Security Income (SSI), and Administrative Payments programs. As good stewards of our resources and taxpayer funds, these workloads help ensure eligible individuals timely receive the benefits to which they are entitled and safeguard the integrity of benefit programs by confirming eligibility and preventing fraud. We remain focused on the integrity of our programs, including minimizing improper payments (IP). "Ensure Stewardship of SSA Programs" is a Strategic Goal in our Agency Strategic Plan for Fiscal Years (FY) 2022–2026. Each year, we report IP findings, both overpayments (OP) and underpayments (UP), from our stewardship reviews of the nonmedical aspects of the OASDI and SSI programs. We conduct Medical Continuing Disability Reviews (CDR) to determine whether disability beneficiaries meet the programs' medical criteria. Terminating disability benefits after a CDR does not necessarily mean that the original determination was incorrect; it means the beneficiary's medical condition has improved and the beneficiary no longer meets our definition of disability. Therefore, we consider the benefits received before improvement to be proper.

On March 2, 2020, S. 375, the *Payment Integrity Information Act of 2019* (PIIA) was signed into law. This law changed government-wide IP reporting requirements by repealing and replacing the *Improper Payments Information Act of 2002*, the *Improper Payments Elimination and Recovery Act of 2010*, the *Improper Payments Elimination and Recovery Improvement Act of 2012*, and the *Fraud Reduction and Data Analytics Act of 2015*. On March 5, 2021, the Office of Management and Budget (OMB) published a revised version of OMB Circular No. A-123, Appendix C, *Requirements for Payment Integrity Improvement*, to implement the provisions of PIIA. The goal of the revised version of OMB Circular A-123, Appendix C is to transform the payment integrity compliance framework and create a more comprehensive and meaningful set of requirements to allow agencies to spend less time complying with low-value activities and more time researching the underlying causes of IPs, balancing payment integrity risks and controls, and building the capacity to help prevent IPs.



In accordance with OMB guidelines, we report as improper those payments that resulted from:

- Our mistake in computing the payment;
- Our failure to obtain or act on available information affecting the payment;
- A beneficiary's failure to report an event; or
- A beneficiary's incorrect report.

PIIA requires agencies to review and assess all programs with annual outlays greater than \$10,000,000 for IP risk at least once every three years to identify those susceptible to significant IPs. Programs that are not likely to have an annual amount of IPs plus annual unknown payments above the statutory threshold (which is either (a) both 1.5 percent of program outlays and \$10,000,000 of all program payments made during the fiscal year, or (b) \$100,000,000) are in Phase 1. Per this definition, our Administrative Payments program is in Phase 1. Our assessment of IP risk in our Administrative Payments program in FY 2024 determined that the program is not susceptible to significant IPs. We will conduct another IP risk assessment of our Administrative Payments program in FY 2027. If a program in Phase 1 determines that it is likely to annually make IPs plus unknown payments above the statutory threshold then the program will move into Phase 2 the following year. Once in Phase 2 a program will have a different set of requirements such as reporting an annual IP and unknown payment estimate. Our OASDI and SSI programs are in Phase 2. Additional information about the IPs, root causes, and corrective actions in our programs can be found on PaymentAccuracy.gov.

A Phase 2 program that reports IPs resulting in monetary loss in excess of \$100,000,000 annually is considered a High-Priority program. Our OASDI and SSI programs meet the definition of High-Priority programs. This report provides a summary of our payment integrity activities and results for our High-Priority programs. There were no changes in payment integrity methodology for the reporting period. The information presented in this report complies with the guidance provided in OMB Circular No. A-123, Appendix C, *Requirements for Payment Integrity Improvement*, and OMB Circular No. A-136, *Financial Reporting Requirements*.

#### **Overview**

We are committed to ensuring we issue accurate payments to eligible individuals at the right time. Our internal quality reviews indicate that our FY 2023 OASDI benefit payments were 99.76 percent free of OPs, and 99.94 percent were free of UPs. For the same year, 90.82 percent of all SSI payments were free of OP, and 98.56 percent were free of UP. FY 2024 data will be available in the summer of FY 2025.

While our payment accuracy rates, including both OPs and UPs, are high, even small error rates add up to substantial IP amounts given the magnitude of the benefits we pay each year. For instance, based on our FY 2023 stewardship reviews, we estimate that we paid over \$1.4 trillion in benefit payments. Our combined OPs and UPs for OASDI totaled approximately \$4.1 billion. The combined OPs and UPs for SSI totaled approximately \$6.5 billion. With each tenth of a percentage point in payment accuracy representing about \$1.4 billion in OASDI and \$61.0 million in SSI program outlays, we are focused on combatting the leading causes of IPs and improving program integrity to protect taxpayer dollars.



As good stewards, we seek ways to do business better by addressing the root causes of IPs and improving payment accuracy. We are committed to continually improving the administration of our programs and working to identify and address potential inequities.



### **OASDI Improper Payments**

#### **OASDI Improper Payment Experience**

Based on our stewardship reviews, we estimate that we paid approximately \$1.4 trillion to OASDI beneficiaries in FY 2023. Of that total, we estimate \$3.3 billion were OPs, representing approximately 0.24 percent of outlays. We estimate that UPs during this same period were \$0.8 billion, the equivalent of approximately 0.06 percent of outlays. The following table shows our estimated IPs in the OASDI program broken out by OMB's IP cause categories.

## FY 2023 OASDI Improper Payments<sup>1, 2, 3, 4</sup> (Dollars in Millions)

	Dollars	Percent of Outlays
Outlays	\$1,352,425.85	
Proper Payments	\$1,348,333.17	99.70%
Improper Payments	\$4,092.67	0.30%
Overpayments	\$3,259.31	0.24%
Within the Agency's Control	\$850.88	0.06%
Data or Information Needed Does Not Exist	\$0.00	0.00%
Inability to Access Data or Information Needed	\$0.00	0.00%
Failure to Access Data or Information Needed	\$850.88	0.06%
Outside the Agency's Control	\$2,408.44	0.18%
Data or Information Needed Does Not Exist	\$0.00	0.00%
Inability to Access Data or Information Needed	\$2,408.44	0.18%
Failure to Access Data or Information Needed	\$0.00	0.00%
Non-Monetary Loss Improper Payments	\$833.36	0.06%
Underpayments	\$833.36	0.06%
Data or Information Needed Does Not Exist	\$0.00	0.00%
Inability to Access Data or Information Needed	\$52.29	0.00%
Failure to Access Data or Information Needed	\$781.07	0.06%
Technically Improper Payments	\$0.00	0.00%
Unknown Payments	\$0.00	0.00%
Improper Payments + Unknown Payments	\$4,092.67	0.30%

#### Notes:

- Amounts are estimated amounts from the FY 2023 annual stewardship reviews and may vary from actual amounts. FY 2024 data will be available in the summer of FY 2025.
- 2. There may be slight variances in the dollar amounts and percentages reported on <a href="PaymentAccuracy.gov">PaymentAccuracy.gov</a> due to rounding of source data. We derive percentages from unrounded source data.
- 3. Totals may not equal the sum of amounts due to rounding.
- 4. OMB Circular No. A-123, Appendix C, Requirements for Payment Integrity Improvement, defines IP cause categories.



#### **OASDI Improper Payment Causes and Corrective Actions**

Our stewardship review findings over the last 5 years show the major causes of IPs in the OASDI program are relationship and dependency, beneficiaries' employment activity (referred to as substantial gainful activity (SGA)), and errors in computations, accounting for 31, 25, and 18 percent of OASDI IPs, respectively. The major causes of OPs are relationship and dependency, SGA, and errors in computations, accounting for 40, 23, and 13 percent of OASDI OPs, respectively. The major cause of UPs is errors in computations, which accounts for 67 percent of OASDI UPs. OASDI IPs occur due to beneficiaries' failure to report changes that may affect benefits, or our failure to update benefit amounts in a timely manner. Below, we discuss corrective actions for these major causes. Additional information about the IPs, root causes, and corrective actions in the OASDI program can be found on <a href="PaymentAccuracy.gov">PaymentAccuracy.gov</a>.

#### **Relationship and Dependency**

#### **Description:**

Over the last 5 years, relationship and dependency errors account for 31 percent of OASDI IPs. Marital standing and child relationship factors are material when determining entitlement to certain auxiliary and survivor benefits. Technicians must establish the existence, duration, and validity of a marriage when the present or former marriage to the insured worker is a factor of entitlement. These errors occur when a beneficiary does not report a marriage, divorce, or remarriage timely.

Payment errors based on relationship and dependency correspond to the following OMB IP cause categories in the FY 2023 OASDI Improper Payments table: Overpayments/Within the Agency's Control/Failure to Access Data or Information Needed; and Overpayments/Outside the Agency's Control/Inability to Access Data or Information Needed.

Total projected OP deficiency dollars for FY 2019 through FY 2023: \$6.3 billion

Annual average: \$1.3 billion

#### **Corrective Actions:**

The findings from our stewardship reviews inform the agency's corrective action plans to reduce IPs. Through the Improper Payments Alignment Strategy (IPAS) process, we determine the most cost-effective strategies to remediate the underlying cause of the IP, and we monitor, measure, and revise the strategies, as needed. Because marital status and relationship reporting deficiencies recently became a leading cause of OASDI OPs in FYs 2022-2023, we will be developing an IPAS on this subject matter in FY 2025. In the interim, in FY 2024, we published several blogs and Social Security TV slides in field office waiting areas on the importance of reporting relationship changes to us for OASDI beneficiaries to improve the responsiveness of beneficiaries and recipients in self-reporting information that impacts benefit payments.



#### **Computations**

#### **Description:**

Over the last 5 years, errors in our computations account for 25 percent of OASDI IPs. We determine a person's benefit amount based on several factors, including age, earnings history, and the type of benefit awarded. Windfall Elimination Provision (WEP) computations also result in IPs. Inaccurate information and administrative mistakes can cause errors in calculating benefits.

Payment errors based on computations correspond to the following OMB IP cause categories in the FY 2023 OASDI Improper Payments table: Overpayments/Within the Agency's Control/Failure to Access Data or Information Needed; Overpayments/Outside the Agency's Control/Inability to Access Data or Information Needed; Underpayments/Inability to Access Data or Information Needed; and Underpayments/Failure to Access Data or Information Needed.

Total projected OP and UP deficiency dollars for FY 2019 through FY 2023: \$5.2 billion

Annual average: \$1.0 billion

#### **Corrective Actions:**

In FY 2025, we will complete an IPAS on Computations. Additionally, we are taking the following actions to address IPs related to computations:

- Robotic Processing Automation: We developed processes using UIPath software. In FY 2021, we pursued a contract with UIPath software, to create automated "robotic" programs that will perform routine or repetitive tasks. Robotic Processing Automation (RPA), or "BOTs," are available to Processing Center technicians to assist with processing manual awards or post-entitlement actions. Since January 2021, several BOTs have been created and placed into production. Use of BOTs reduces keystrokes and manual coding and detects exceptions and alerts before they occur. In FY 2025, we plan to enhance the existing RPA scripts and identify opportunities to automate computations and inputs to reduce input errors. We are making a long-term investment in robotics technology using the software to improve business processes and eliminate manual actions.
- Federal Employees' Compensation Act Data: We developed a data exchange for the Federal Employees' Compensation Act (FECA) data that we are on track to execute in FY 2025. The FECA workers' compensation program, which is administered by the Department of Labor (DOL), provides coverage to three million Federal and Postal workers. Receipt of FECA benefits can offset OASDI benefits. In December 2023, the agency established an eCOMP system Memorandum of Understanding with DOL to obtain FECA benefits to allow the agency to offset OASDI benefits and prevent or reduce OPs. Technicians can complete an ad hoc query in eCOMP to obtain FECA data, the FECA payment status, dates, amounts and it is immediately available to the technician via the eCOMP portal.



• Comprehensive Corrective Action Plan for Windfall Elimination Provision and Government Pension Offset: WEP applies when the wage earner receives Social Security retirement or disability benefits and is entitled to a pension based on non-covered work. Non-covered pensions are paid by employers that do not withhold Social Security taxes and may be based on earnings from employment in the United States or another country. The Government Pension Offset (GPO) provision adjusts Social Security spouse's or widow(er)'s benefits for those who receive a non-covered pension from a Federal, State, or local government in the United States. When GPO applies, the Social Security monthly benefit amount is reduced by two-thirds of the amount of the non-covered government pension.

We developed a comprehensive corrective action plan to address multiple underlying causes of WEP and GPO IPs. We developed policy, data, systems, and training solutions in line with each of the root causes of IPs. We developed a logic model framework to measure the effectiveness of completed corrective action that includes establishing benchmarks to evaluate the corrective actions, assessing the impact, if possible, and determining whether additional mitigation activities are necessary. In FY 2023, the WEP/GPO calculator was added to the redesigned SSA.gov website. In FY 2023, there was an increase in IPs related to WEP, but overall, since FY 2017, there has been a significant reduction in IPs related to WEP and GPO. In March 2024, we provided detailed information to technicians regarding the importance of securing non-covered Government Pension data timely, when applicable, in order to calculate the correct benefit amount.

#### **Substantial Gainful Activity**

#### **Description:**

SGA is continuously a leading cause of OPs in the OASDI program, accounting for 18 percent of OASDI IPs over the last 5 years. When disability beneficiaries work, several factors determine whether they remain eligible for monthly benefits. Beneficiaries' failure to report earnings in a timely manner accounts for 86 percent of SGA-related IPs and our failure to take the proper actions to process work reports accounts for the remainder.

Payment errors based on SGA correspond to the following OMB IP cause categories in the FY 2023 OASDI Improper Payments table: Overpayments/Within the Agency's Control/Failure to Access Data or Information Needed; and Overpayments/Outside the Agency's Control/Inability to Access Data or Information Needed.

Total projected OP deficiency dollars for FY 2019 through FY 2023: \$3.6 billion

Annual average: \$0.7 billion

#### **Corrective Actions:**

We are exploring ways that will make it easier for beneficiaries and employers to report wages, as well as ways we can obtain real time wage data to reduce IPs. We are taking the following actions to address IPs related to SGA:



- Payroll Information Exchange: To reduce the reliance on self-reporting of wages, we are developing new wage reporting tools, such as an automated information exchange with commercial payroll data providers authorized by section 824 of the *Bipartisan Budget Act of 2015*, now referred to as the Payroll Information Exchange (PIE). In February 2024, we published a Notice of Proposed Rulemaking (NPRM) describing the agency's plans for accessing and using information from payroll data providers to reduce IPs, which improves service to customers. The public comment period closed on April 15, 2024. We are carefully considering the comments as we draft the final rule. In FY 2024, we completed design of the automated PIE wage reporting notices and created a limited issue diary to alert technicians when incoming wage and employment information from PIE doesn't automatically post to the SSI record, requiring manual review and action. We plan to implement PIE after the final rule (regulation) is established. This timeline will ensure compliance with rulemaking requirements and allow us to respond to public concerns from the NPRM public comment period.
- **Continuing Disability Review Product:** We are developing the CDR Product. The CDR Product is a project to streamline the CDR process, increase efficiencies, and reduce IPs. The multifaceted product is comprised of four separate workstreams: Work CDR, Medical CDR, Electronic Disability Collect System (EDCS), and CDRs Modernization, across several component business and systems sponsors. In FY 2023, CDR Product released the i454 which allows adult beneficiaries with an online option to file the SSA-454 or a Medical CDR Report. When the customer uses this online version, the technician's process is streamlined and allows for quicker processing. In FY 2024, we released Multiple Pending Claim functionality to the EDCS that will reduce the reliance on paper processing. The eWork system, which processes and controls OASDI return-to-work cases, is now Multi-Factor Authentication (MFA) compliant. We are currently developing a modernized replacement of eWork which will be integrated into the existing EDCS application. The eWork replacement will reinforce policy and intuitively drive best practices to reduce IPs. In FY 2024 we made technical releases for the eWork replacement. We will release the minimum viable product to technicians in tandem with retiring eWork by the end of FY 2025.
- Reporting Responsibilities: Section 826 of the *Bipartisan Budget Act of 2015* required the Commissioner (COSS) to establish and implement a system permitting DI beneficiaries to report their earnings electronically. Our myWageReport (myWR) online application, allows DI beneficiaries, SSI recipients, concurrent beneficiaries, and representative payees to report wages and view, print, or save a receipt. DI self-reporters and their representative payees can report wages that occurred within a two-year timeframe from the reporting date. We promote use of our online wage reporting application, myWR, on social media with training videos. From October 2023 through February 2024, we released social media posts on Facebook and X sharing a link to our YouTube video to help beneficiaries learn why it is important to report wages and the automated electronic options for wage reporting.
- **Simplify Notices and Communications:** We are working to simplify our notices and communications. Some of our notices and communications can be complex, lengthy, and difficult to comprehend. The difficulty can sometimes result from the complexity of our programs and legal requirements to communicate certain information. We are



currently updating the Work Activity Report (SSA-821), to make it more understandable and more likely to be completed by applicants and beneficiaries. We use form SSA-821 to collect information about applicant's and beneficiary's work, applicable work incentives, and non-work-related pay. It allows us to make accurate decisions as to whether beneficiaries are performing SGA. We developed a Work Incentive Notice pilot for increasing completion of the SSA-821 by sending beneficiaries pre-notices that incorporate behaviorally informed language to encourage completion of these reports. In addition, throughout 2024 we reviewed new and revised agency notices for both clear messaging and plain language.

• WorkSmart: WorkSmart is a tool that identifies DI beneficiaries whose earnings put them at risk for being overpaid. We created the WorkSmart project to reduce IPs by alerting cases quickly after the beneficiary starts to work. In FY 2024, WorkSmart continued to alert cases for work CDRs based on available earnings data. WorkSmart will use PIE data when available to alert cases for a work CDR. We will continue to use WorkSmart to reduce OPs.



## **SSI Improper Payments**

#### **SSI Improper Payment Experience**

Based on our stewardship reviews, we estimate that we paid approximately \$61.0 billion to SSI recipients in FY 2023. Of that total, we estimate \$5.6 billion were OPs, representing approximately 9.18 percent of outlays. We estimate that UPs during this same period were \$0.9 billion, the equivalent of approximately 1.44 percent of outlays. The following table shows our estimated IPs in the SSI program broken out by OMB's IP cause categories.

## FY 2023 SSI Improper Payments<sup>1, 2, 3, 4</sup> (Dollars in Millions)

	Dollars	Percent of Outlays
Outlays	\$61,048.75	
Proper Payments	\$54,565.90	89.38%
Improper Payments	\$6,482.84	10.62%
Overpayments	\$5,604.97	9.18%
Within the Agency's Control	\$346.69	0.57%
Data or Information Needed Does Not Exist	\$0.00	0.00%
Inability to Access Data or Information Needed	\$0.00	0.00%
Failure to Access Data or Information Needed	\$346.69	0.57%
Outside the Agency's Control	\$5,258.28	8.61%
Data or Information Needed Does Not Exist	\$463.82	0.76%
Inability to Access Data or Information Needed	\$4,794.46	7.85%
Failure to Access Data or Information Needed	\$0.00	0.00%
Non-Monetary Loss Improper Payments	\$877.87	1.44%
Underpayments	\$877.87	1.44%
Data or Information Needed Does Not Exist	\$306.64	0.50%
Inability to Access Data or Information Needed	\$388.44	0.64%
Failure to Access Data or Information Needed	\$182.79	0.30%
Technically Improper Payments	\$0.00	0.00%
Unknown Payments	\$0.00	0.00%
Improper Payments + Unknown Payments	\$6,482.84	10.62%

#### Notes:

- 1. Amounts are estimated amounts from the FY 2023 annual stewardship reviews and may vary from actual amounts. FY 2024 data will be available in the summer of FY 2025.
- 2. There may be slight variances in the dollar amounts and percentages reported on <a href="PaymentAccuracy.gov">PaymentAccuracy.gov</a> due to rounding of source data. We derive percentages from unrounded source data.
- 3. Totals may not equal the sum of amounts due to rounding.
- 4. OMB Circular No. A-123, Appendix C, Requirements for Payment Integrity Improvement, defines IP cause categories.



## **SSI Improper Payment Causes and Corrective Actions**

Our stewardship review findings over the last 5 years show the major causes of IPs in the SSI program are changes in financial accounts, wages, and in-kind support and maintenance (ISM), which account for 28, 24, and 9 percent of SSI IPs, respectively. The major causes of OPs are changes in financial accounts, wages, and ISM, which account for 32, 20, and 5 percent of SSI OPs, respectively. The major cause of UPs is changes to ISM, which accounts for 28 percent of SSI UPs. SSI IPs occur due to recipients' failure to report or our failure to update payments in a timely manner. Below, we discuss corrective actions for these major causes. Additional information about the IPs, root causes, and corrective actions in the SSI program can be found on PaymentAccuracy.gov.

#### **Financial Accounts**

#### **Description:**

The leading cause of SSI IPs is financial accounts with countable resources over the allowable resource limits, accounting for 28 percent of SSI IPs over the last five years. When an applicant, recipient, or deemor has financial accounts with values exceeding the allowable resource limits, these accounts may result in periods of SSI ineligibility.

Payment errors based on financial accounts correspond to the following OMB IP cause category in the FY 2023 SSI Improper Payments table: Overpayments/Within the Agency's Control/Failure to Access Data or Information Needed; and Overpayments/Outside the Agency's Control/Inability to Access Data or Information Needed.

Total projected OP deficiency dollars for FY 2019 through FY 2023: \$8.5 billion

Annual average: \$1.7 billion

#### **Corrective Actions:**

We are taking the following actions to address IPs related to financial accounts:

• Non-medical Redeterminations/Limited Issues: A non-medical SSI redetermination (RZ) is a complete review of a recipient's or couple's non-medical eligibility factors (resources, income, and living arrangements) to determine whether the recipient or couple has remained eligible since the time of the previous decision, is still eligible for SSI, and has been receiving and will continue to receive the correct SSI payment amount. To ensure the most cost effective investment of agency resources, we use a predictive model to estimate the likelihood and magnitude of OPs to select cases for discretionary RZs. Other cases are selected for RZs outside our modeling process based on selected case characteristics, such as manual deeming of income. The RZ process also selects limited issue (LI) reviews, which are reviews of a specific issue or event related to a recipient's or couple's non-medical eligibility factors to determine whether the recipient or couple is still eligible for and receiving the correct SSI payment. In December 2023, we issued guidance on achieving FY 2024 RZ and LI workload goals, with reminders to field offices about best practices and following the order of priority when scheduling RZs



and LIs. In FY 2024, we completed more than 2.5 million SSI non-medical RZs and LIs. We plan to process about 2.5 million SSI RZs and LIs in FY 2025.

- Access to Financial Institutions: The purpose of Access to Financial Institutions (AFI) is to identify resources in financial accounts; excess resources are a leading cause of SSI payment errors. The AFI program uses an electronic process with participating financial institutions to verify bank account balances and detect undisclosed accounts in up to 10 nearby banks based on the residential address. In March 2023, we released Policy in Focus training and issued a frontline broadcast to remind technicians of AFI and SSI financial accounts policy. In August 2023, we issued a frontline broadcast to ensure that technicians are reviewing the financial account pages in the SSI claims path for accuracy before adjudicating an event. In FY 2024, we began analysis on optimizing the use of AFI. We expect to conclude our study on optimal frequency for use of AFI and related recommendations in FY 2025.
- Consolidated Claims Experience: The Consolidated Claims Experience (CCE) will be a single-entry point for employees to process all agency benefits. CCE includes eligibility screening, initial claims intake processing, and post-entitlement activities. Currently, only SSI is available in CCE, with additional claim types (i.e., OASDI and Title 18, Medicare) to be added in future releases. In FY 2023, there were several CCE updates in the SSI program to improve CCE software performance, correct software problems, and respond to employee feedback. In December 2023, CCE Announcements became available. Now, when updates are made within CCE, the technicians receive a brief message the first time they access the application describing the changes. Hyperlinks will be provided for the user to access more in-depth information. This enhancement is designed to assist our busy technicians by providing just-in-time information within CCE, so they do not have to pause and locate references related to CCE.
- **Simplify Notices and Communications:** We have been working to simplify our communications and target our outreach so recipients better understand reporting requirements. For example, we updated a blog for "Social Security Matters" that focuses on the importance of SSI recipients reporting their financial accounts and any changes related to financial accounts to us. In an effort to increase responsiveness of beneficiaries and recipients in self-reporting information that impacts payments, we used behavioral insights methods to improve the clarity and effectiveness of the blog.
- **Evaluation of Corrective Actions:** We developed a logic model framework to measure the effectiveness of completed corrective actions that includes establishing benchmarks to evaluate the corrective actions, assessing the impact, if possible, and determining whether additional mitigation activities are necessary. In FY 2024, we completed the evaluation of completed actions for financial accounts.

#### Wages

#### **Description:**

For more than a decade, wage discrepancies have been one of the leading causes of SSI IPs, accounting for 24 percent of SSI IPs over the last 5 years. Wage discrepancies occur when the



recipient or their deemor has actual wages that differ from the wage amount we used to calculate the SSI payment, either because the recipient failed to report a change, or we failed to make changes to payments in a timely manner.

Payment errors based on wages correspond to the following OMB IP cause categories in the FY 2023 SSI Improper Payments table: Overpayments/Within the Agency's Control/Failure to Access Data or Information Needed; Overpayments/Outside the Agency's Control/Inability to Access Data or Information Needed; Underpayments/Inability to Access Data or Information Needed; and Underpayments/Failure to Access Data or Information Needed.

Total projected OP and UP deficiency dollars for FY 2019 through FY 2023: \$7.2 billion

Annual average: \$1.4 billion

#### **Corrective Actions:**

We are taking the following actions to address IPs related to wages:

- Payroll Information Exchange: Please see our discussion of PIE under Corrective Actions for Substantial Gainful Activity in the OASDI Improper Payment Causes and Corrective Actions section.
- Non-medical Redeterminations/Limited Issues: Please see our discussion of Non-medical RZs/LIs under Corrective Actions for Financial Accounts in the SSI Improper Payment Causes and Corrective Actions section.
- **SSA Mobile Wage Reporting App:** SSI recipients, deemors, and representative payees may use the SSA Mobile Wage Reporting App (available for download at no cost from Google Play and Apple App) to report wages and ensure payment accuracy. We implemented MFA in September 2023. In FY 2024, we continued non-public facing technical enhancements to the application to offer a more secure method of authentication for application users.
- Reporting Responsibilities: We promote use of our online wage reporting application, myWR, on social media with training videos including information about the importance of creating a *my* Social Security account; how to submit wages using myWR, SSA Mobile Wage Reporting, or SSI Telephone Wage Reporting; who can report; and reminders on reporting responsibilities. From October 2023 through February 2024, we published social media posts on Facebook and X sharing a link to our YouTube video to help beneficiaries learn why it is important to report wages and the automated electronic options for wage reporting.
- **Simplify Notices and Communications:** We are currently updating the SSA-821 to make it more understandable and more likely to be completed by applicants.



#### **In-Kind Support and Maintenance**

#### **Description:**

ISM has been the third-leading cause of OPs and the leading cause of UPs, accounting for 9 percent of SSI IPs over the last 5 years. When processing initial claims and post-entitlement reviews, we ask questions to help us determine if recipients are paying their share of household expenses. If recipients are not paying their *pro rata* share, we generally count the difference between the *pro rata* share amount and the actual contribution as income to the recipient in the form of ISM. SSI recipients and their representative payees are required to notify the agency when a change occurs in household expenses, contributions, or composition. Failure to report or delays in reporting household changes are the primary causes of OPs and UPs related to ISM. Recipients and representative payees must report ISM changes (e.g., living arrangements) by phone, mail, or in person within ten days after the end of the month when the event happened. Self-reporting is the primary tool we use to obtain information on changes that affect ISM.

Payment errors based on ISM correspond to the following OMB IP cause categories in the FY 2023 SSI Improper Payments table: Overpayments/Within the Agency's Control/Failure to Access Data or Information Needed; Overpayments/Outside the Agency's Control/Data or Information Needed Does Not Exist; Underpayments/Data or Information Needed Does Not Exist; and Underpayments/Failure to Access Data or Information Needed.

Total projected OP and UP deficiency dollars for FY 2019 through FY 2023: \$2.7 billion

Annual average: \$0.5 billion

#### **Corrective Actions:**

We are taking the following actions to address IPs related to ISM:

- **Policy Changes:** The process and policies as well as statutory and regulatory requirements to administer ISM are complicated and pose challenges to the administration of our programs. As of September 30, 2024, we made three updates as part of the SSI regulation simplification (although they will not be reflected in the current IP numbers, as the IP rates reported in this AFR are for FY 2023):
  - Omitting Food from ISM Calculations The rule no longer counts as ISM an applicant's or recipient's receipt of informal food assistance from friends, family, and community networks of support. The new policy further helps in several important ways: the change is easier to understand and use by applicants, recipients, and agency employees; applicants and recipients have less information to report about food assistance received from family and friends, removing a significant source of burden; the reduced month-to-month variability in payment amounts will improve payment accuracy; and the agency will see administrative savings because less time will be spent administering food ISM.
  - Expanding the Rental Subsidy This expands nationwide the SSI rental subsidy policy, which was only available to SSI applicants and recipients residing in seven States (Connecticut, Illinois, Indiana, New York, Texas, Vermont, and Wisconsin).



- Under the rule, rental assistance, such as renting at a discounted rate, is less likely to affect a person's SSI eligibility or payment amount. This may increase the benefit amount some people are eligible to receive and will allow more people to qualify for critical SSI payments.
- Expanding the Definition of a Public Assistance Household This expands the definition of a public assistance household to include households receiving Supplemental Nutrition Assistance Program payments and households where only some members receive public assistance. The expanded definition will allow more people to qualify for SSI, increase some SSI recipients' payment amounts, and reduce reporting burdens for individuals living in public assistance households.
- National Change of Address: We have a National Change of Address (NCOA) contract and data exchange agreement with the U.S. Postal Service (USPS) for the OASDI program. We are electronically notified when an OASDI beneficiary reports an address change to the USPS, and in most cases, the new address information automatically posts to our records. We are updating a notice to add a reminder informing concurrent OASDI and SSI recipients to contact us because we may need additional information regarding their living situation. The notice will have clarified language to concurrent OASDI and SSI recipients informing them to contact us to report living arrangement changes that may have occurred with the address change received through the NCOA process.
- **Evaluation of Corrective Actions:** We developed a logic model framework to measure the effectiveness of completed corrective actions that includes establishing benchmarks to evaluate the corrective actions, assessing the impact, if possible, and determining whether additional mitigation activities are necessary. In FY 2024, we completed the evaluation of completed corrective actions for ISM.

## **Entitlement Reviews and Office of the Inspector General Anti-Fraud Activities**

We are committed to improving financial management by preventing fraudulent and IPs (see the Payment Integrity section for more information). Section 206 (g) of the *Social Security Independence and Program Improvements Act*, Public Law 103-296, requires us to report annually on the extent to which we reviewed cases of entitlement to monthly OASI and DI benefits (referred to as OASDI when discussing them in combination) and SSI payments; and the extent to which the cases we reviewed were those that involved a high likelihood or probability of fraud.

#### **Entitlement Reviews**

Entitlement reviews help ensure that continued monthly payments are correct. We select cases and undertake reviews, both prior to and after effectuation of payment, to ensure that development procedures and benefit awards are correct.

Due to the Coronavirus Disease 2019 (COVID-19) pandemic, we discontinued all quality assurance samples for the third quarter of FY 2020. For CDRs, we discontinued the sample for



the third and fourth quarters of FY 2020. As a result, the initial and reconsideration data include only cases reviewed during the first, second, and fourth quarters of FY 2020. The FY 2020 CDR data include only reviews completed during the first and second quarters of FY 2020. We resumed regular CDR sampling in the first quarter of FY 2021. While we continued quality assurance reviews throughout the year, due to low volume of disability determination services (DDS) CDR clearances in the fourth quarter of FY 2024, we suspended the CDR quality assurance sample in our analysis below.

We conduct the following major entitlement reviews:

#### **Disability Quality Assurance Reviews**

We perform quality assurance reviews of random samples of DDS determinations to measure our level of accuracy against standards mandated by the regulations. We review initial claims, requests for reconsideration, and determinations of continuing eligibility prior to the effectuation of the DDS determinations. The following table shows the quality assurance accuracy rates for FY 2020 through FY 2024.

#### **Quality Assurance Reviews**

	FY 2024	FY 2023	FY 2022	FY 2021	FY 2020
Percent of State DDS decisions to allow or continue not returned to the DDS offices for correction	97.38%	97.41%	96.87%	96.62%	96.62%
Number of cases reviewed	28,434	35,076	40,251	40,295	29,588
Number of cases returned to the DDS offices due to error or inadequate documentation	744	909	1,259	1,360	1,001

#### **DI Pre-Effectuation Reviews**

We perform pre-effectuation reviews of favorable DI and concurrent DI/SSI initial and reconsideration determinations using a risk-profiling system to select cases for review. This profiling system helps ensure the cost-effectiveness of pre-effectuation reviews, and it satisfies the legislative requirement that the cases we review are those that are most likely to be incorrect. We also review a sufficient number of CDR continuance determinations to ensure a high level of accuracy in those cases. The following table shows the DI pre-effectuation accuracy rates for FY 2020 through FY 2024.

#### **DI Pre-Effectuation Reviews**

	FY 2024	FY 2023	FY 2022	FY 2021	FY 2020
Percent of State DDS decisions to allow or continue not returned to the DDS offices for correction	95.64%	95.56%	95.03%	94.65%	95.23%
Number of cases reviewed	269,286	246,318	252,245	238,616	268,569
Number of cases returned to the DDS offices due to error or inadequate documentation	11,736	10,927	12,538	12,761	12,810



#### **SSI Pre-Effectuation Reviews**

We conduct pre-effectuation reviews of favorable SSI initial and reconsideration adult determinations. As in DI cases, we use a profiling system to select cases for review. The following table shows the SSI pre-effectuation accuracy rates for FY 2020 through FY 2024.

#### **SSI Pre-Effectuation Reviews**

	FY 2024	FY 2023	FY 2022	FY 2021	FY 2020
Percent of State DDS decisions to allow not returned to the DDS offices for correction	96.76%	96.66%	96.52%	96.27%	96.07%
Number of cases reviewed	93,930	84,352	81,333	86,779	94,105
Number of cases returned to the DDS offices due to error or inadequate documentation	3,046	2,820	2,834	3,239	3,696

#### **Continuing Disability Reviews**

We use periodic CDRs to determine whether beneficiaries continue to meet our medical standards for disability. We also conduct a quality review of those decisions. The following table shows the CDR accuracy rates for FY 2020 through FY 2024.

#### **CDR Accuracy**

	FY 2024	FY 2023	FY 2022	FY 2021	FY 2020
Overall accuracy	97.0%	97.2%	96.9%	96.5%	96.8%
Continuance accuracy	98.2%	98.3%	98.1%	97.7%	97.6%
Cessation accuracy	92.6%	93.6%	92.3%	92.3%	93.2%

#### **OASDI and SSI Quality Assurance Reviews**

Quality assurance reviews assess the accuracy of benefit payments. The following tables show the OASDI and SSI accuracy rates for FY 2020 through FY 2023. Data for FY 2024 are not yet available. We will report the FY 2024 data in our FY 2025 *Agency Financial Report* (AFR).

#### OASDI Accuracy<sup>1</sup>

	FY 2024	FY 2023	FY 2022	FY 2021	FY 2020
Overpayment accuracy	Data not yet available	99.76%	99.49%	99.83%	99.83%
Underpayment accuracy	Data not yet available	99.94%	99.86%	99.95%	99.94%



#### SSI Accuracy<sup>1</sup>

	FY 2024	FY 2023	FY 2022	FY 2021	FY 2020
Overpayment accuracy	Data not yet available	90.82%	91.98%	92.83%	91.24%2
Underpayment accuracy	Data not yet available	98.56%	98.82%	98.45%	98.67%

#### Notes:

- 1. There may be slight variances in the percentages reported on <a href="PaymentAccuracy.gov">PaymentAccuracy.gov</a> due to rounding of source data. We derive percentages from unrounded source data.
- 2. The FY 2021 AFR incorrectly stated the FY 2020 SSI OP accuracy rate was 91.25% due to a minor issue in the dollar error tabulation formula that was discovered in April 2022. The rate was corrected in the FY 2022 AFR.

#### **SSI Redeterminations**

SSI redeterminations are periodic reviews of non-medical factors to ensure that a recipient remains eligible for SSI payments and that we have paid and will continue to pay the recipient the correct amount. The following table shows the number of SSI redeterminations we completed for FY 2020 through FY 2024.

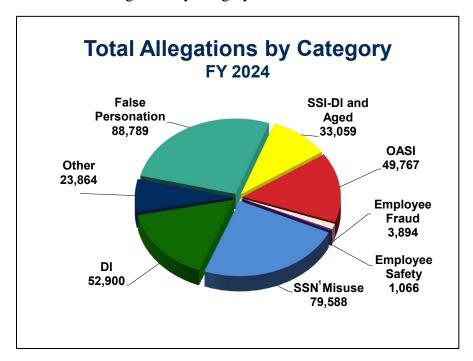
## SSI Redeterminations (In Millions)

	FY 2024	FY 2023	FY 2022	FY 2021	FY 2020
Number of redeterminations completed	2.55	2.52	2.20	2.37	2.15



## The Office of the Inspector General's Anti-Fraud Activities

In FY 2024, we worked with our OIG, the U.S. Department of Justice, and other government agencies on cases involving fraud, waste, and abuse as part of our fraud detection and prevention program for safeguarding our assets. In FY 2024, as in prior years, OIG received a significant number of imposter scam allegations. The following chart provides information from our OIG concerning fraud and other allegations by category in FY 2024.<sup>2</sup>



Note:

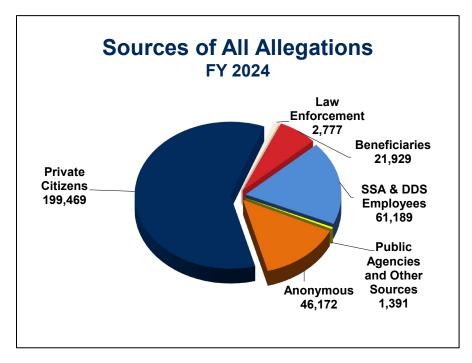
1. Social Security Number

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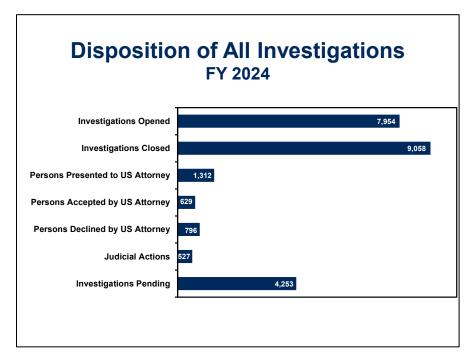
<sup>&</sup>lt;sup>2</sup> The category of an allegation may change in limited cases during an investigation. Therefore, the numbers reported in the charts may vary slightly from other Agency reporting such as Semiannual Reports to Congress.



The following chart provides information from our OIG concerning sources of all fraud and other allegations in FY 2024.



The metrics in the following chart include the total number of individual subjects or entities referred, accepted, and declined for prosecution by the DOJ where the investigative findings were not subject to pre-established prosecution declination guidelines. Additionally, these metrics are independent. Therefore, persons recorded as declined or accepted during the reporting year may have been presented during a prior year. Similarly, persons presented during the reporting year may not yet have been recorded as declined or accepted.





## **Civil Monetary Penalty Adjustment for Inflation**

The Social Security Act authorizes the COSS to impose a civil monetary penalty (CMP) for certain specific violations. Section 1129 of the Social Security Act authorizes a CMP against anyone who makes any material false statements or representations to the agency or knowingly withholds a material fact from the agency, to obtain or retain benefits or payments under Titles II, VIII, or XVI of the Social Security Act. A CMP may also be imposed against representative payees for the wrongful conversion of Social Security payments entrusted to their care.

Section 1140 of the *Social Security Act* (Section 1140) authorizes a CMP to protect the public from advertisements, solicitations, and other communications (including Internet websites, social media activities, and scam telephone calls) that may convey the false impression that we approved, endorsed, or authorized the communication. Section 1140 also prohibits the reproduction and sale of Social Security publications and forms without our authorization and places restrictions on the charging for services that we provide to the public without charge. The COSS delegated authority to enforce our Section 1140 CMP program to the Inspector General.

The Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015 expanded the categories of penalties that require adjustment for inflation to include CMPs under the Social Security Act and requires agencies to: (1) use an interim final rulemaking to adjust the level of CMPs in 2016 with an initial "catch-up" adjustment; (2) continue to make annual adjustments in future years; and (3) report on these adjustments annually. As required, we are providing information on our current CMPs; these amounts include the initial "catch-up" and annual adjustments. We will continue to make annual adjustments in future years and report on these adjustments annually.



## **Civil Monetary Penalty Adjustments**

			in monotary				
Statutory Authority	Penalty	Year Enacted	Latest Year of Adjustment (via statute or regulation)	Current Penalty Date of Adjustment	Current Penalty Level	Sub- Agency/ Bureau/Unit	Location for Penalty Update Details
Section 206 (b), Social Security Independence and Program Improvements Act of 1994, P. L. 103-296, 108 Stat. 1509	Flagrant Violation (Section 1129 of the Social Security Act, 42 U.S.C. 1320a- 8(a)(1))	1994	2024	01/15/2024	\$0-\$10,289	SSA/OIG	89 Federal Register 1973 (Jan. 2024)
Section 813 (c), <i>Bipartisan</i> <i>Budget Act of</i> <i>2015</i> , P. L. 114-74, 129 Stat. 603	Flagrant Violation (Section 1129 of the Social Security Act, 42 U.S.C. 1320a- 8(a)(1))	2015	2024	01/15/2024	\$0-\$9,704	SSA/OIG	89 Federal Register 1973 (Jan. 2024)
Section 428 (a), Medicare Catastrophic Coverage Act of 1988, P. L. 100-360, 102 Stat. 815	Flagrant Violation (Section 1140 of the Social Security Act, 42 U.S.C. 1320b- 10(b)(1))	1988	2024	01/15/2024	\$0-\$12,799	SSA/OIG	89 Federal Register 1973 (Jan. 2024)
Section 428 (a), Medicare Catastrophic Coverage Act of 1988, P. L. 100-360, 102 Stat. 815	Flagrant Violation (Section 1140 of the Social Security Act, 42 U.S.C. 1320b- 10(b)(2))	1988	2024	01/15/2024	\$0-\$63,991	SSA/OIG	89 Federal Register 1973 (Jan. 2024)



## **Biennial Review of User Fee Charges**

## **Summary of Fees**

In FY 2023 and FY 2024, we earned \$324 million and \$327 million in user fees, respectively. This revenue accounted for less than one percent of our total financing sources. We derived over 71 and 66 percent of user fee revenues from agreements with 20 States and the District of Columbia to administer some or all of the States' supplemental SSI benefits in FY 2023 and FY 2024, respectively. During FY 2024, we charged a fee of \$14.78 per payment for the cost of administering State supplemental SSI payments. This fee will increase to \$15.22 for FY 2025. We charge full cost for other reimbursable activity, such as earnings record requests from pension funds and individuals.

#### **Biennial Review**

The Chief Financial Officers Act of 1990 requires biennial reviews by Federal agencies of agency fees and other charges imposed for services rendered to individuals as opposed to the American public in general. The objective of these reviews is to identify such activities, charge fees as permitted by law, and periodically adjust these fees to reflect current costs or market value.

For our review of fees, we annually evaluate fees for: 1) States' supplemental SSI benefit payment processing; 2) Consent Based Social Security Number (SSN) Verification (CBSV); 3) electronic Consent Based SSN Verification (eCBSV); and 4) direct payment to representatives' fees. In addition, we review and evaluate our uniform standard fee structure for non-programmatic work every two years.

- States' Supplemental SSI Benefit Payment Processing: States are required to pay a fee for Federal administration of State Supplementary Payments (supplemental to Federal SSI payments). In accordance with Section 5102 of the *Balanced Budget Act of 1997*, we adjust the fee annually based on the percentage increase, if any, in the Consumer Price Index (CPI), unless the COSS determines a different rate is appropriate. As noted above, we updated the State SSI administrative fee from \$14.78 to \$15.22 for FY 2025 based on the change in the CPI. This information was communicated to the applicable States.
- Consent Based Social Security Number Verification: The CBSV program provides the business community and other government entities with a consent-based SSN verification. Based on our evaluation this year of CBSV projected costs and revenues, and other relevant information, we decided to continue to use the current rate of \$2.25 per transaction for FY 2025. Given the potential for fluctuation in the volume of verifications requested, we will monitor this activity and evaluate the fee during FY 2025, as necessary. The latest Federal Register Notice, with more information on the CBSV user fee is 2023-17146 (88 FR 54389).
- Electronic Consent Based Social Security Number Verification: The eCBSV program allows permitted entities to submit (based on the number holder's consent) the SSN, name, and date of birth of the number holder in connection with a credit transaction



or a circumstance described in Section 604 of the *Fair Credit Reporting Act* to the agency for SSN verification via an application programming interface. During FY 2024, we analyzed our fee structure and other relevant data including ongoing costs; prior unrecovered cost; and current fee pricing and determined that the user fee tier pricing structure should remain unchanged. While we noted a decrease in ongoing operating expenses from both prior year actuals and previous projections of costs, we still have prior year unrecovered costs that we need to collect to breakeven for this program. Therefore, we believe the best course of action is to maintain the existing fee pricing structure to continue to recover our prior year costs. Refer to Note 6, Accounts Receivable, Net, in the *Audited Financial Statements and Additional Information* section for more information.

Throughout FY 2024, we engaged with eCBSV customers regarding the eCBSV program. Based on user feedback, we evaluated and updated the user fee tier structure with regards to volume of transactions per tier. In FY 2024 we increased the maximum volume allowed in the highest tier. We are continuing to evaluate ongoing costs, fee revenue, and customer feedback as we prepare to analyze the user fee pricing structure in FY 2025. The latest Federal Register Notice, with more information on the eCBSV user fee is 2024-08152 (89 FR 27472).

- **Direct Payments to Representatives:** If a claimant is entitled to past-due benefits from the agency and was represented either by an attorney or by a non-attorney representative who has met certain prerequisites, the *Social Security Act* provides that we may withhold up to 25 percent of the past-due benefits and use that money to pay the representative's approved fee directly to the representative. When we pay the representative's fee directly to the representative, we must collect from that fee payment an assessment to recover the costs we incur in determining and paying representatives' fees. The *Social Security Act* provides that the assessment we collect will be the lesser of two amounts: a specified dollar limit; or the amount determined by multiplying the fee we are paying by the assessment percentage rate. During FY 2024, we set the maximum dollar limit at \$117 and kept the assessment percentage consistent at 6.3 percent based on our review of relevant cost data. The latest Federal Register Notice, with more information on the Direct Payment of Fees for Representatives is 2023-27955 (88 FR 88209).
- Uniform Standard Fees for Non-Programmatic Workloads: Every two years, including FY 2024, we evaluate and publish standard fees for non-programmatic workloads. This year, we performed an evaluation of time spent on these workloads and related direct and overhead cost rates. As a result, we made updates to the fees to reflect current costs or market values. We will perform another review of these fees during FY 2026. The latest Federal Register Notice, with more information on the Direct Payment of Fees for Representatives is 2024-18975 (89 FR 68232).

Beyond the fees noted above, we did not identify any other new fees that should be assessed during our biennial review.



## **Grants Programs**

OMB Circular No. A-136, *Financial Reporting Requirements*, requires agencies to report on Federal grant and cooperative agreement awards that have not yet been closed out and for which the period of performance, including any extensions, elapsed for more than two years. As noted in the following table, we have no such grants or cooperative agreements to report.

The agency has six grant programs monitored by Grants Management Officers (GMO). Each GMO is responsible for monitoring a workload to ensure timely grant closeouts. Although we currently do not have any expired grants that have exceeded the two-year timeframe for closeout, there are occasions when a GMO cannot immediately close a grant. In certain instances, closeout could be delayed by one year.

#### **Grants and Cooperative Agreements Summary**

Category	2-3 Years	3-5 Years	More than 5 Years
Number of Grants/Cooperative Agreements with Zero Dollar Balances	Not Applicable	Not Applicable	Not Applicable
Number of Grants/Cooperative Agreements with Undisbursed Balances	Not Applicable	Not Applicable	Not Applicable
Total Amount of Undisbursed Balances	Not Applicable	Not Applicable	Not Applicable

#### **Climate-Related Financial Risk**

We are committed to climate adaptation and resilience planning to reduce climate change risks and develop new opportunities that climate change may bring, where we can. Our <u>FYs 2024–2027 Climate Adaptation Plan</u> (CAP) reaffirms our vision to improve our capacity to assess and build resilience to climate change risks. Our CAPs, Sustainability Reports, Scorecards, and other climate and sustainability related reports are available on our <u>Sustainability website</u>.

## **Budget, Governance, Strategy, Risk Management, and Metrics**

The Office of the Chief Financial Officer (OCFO) leads our efforts to strategically plan actions that mitigate climate vulnerabilities and lessen climate-related financial risks at the agency. OCFO works closely with our Chief Sustainability Officer and other internal offices primarily involved in executing our sustainability and climate action programs.

In our CAP, we assess five climate hazard exposures – wildfires, flooding, sea level rise, extreme precipitation, and extreme heat – and the strategies we take to ensure our facilities, operations, and employees are resilient to climate change impacts to these extreme weather events. Examples of strategies include utilizing advanced metering systems to identify high-energy usage to reduce electrical loads and assess the need for any additional emergency generators and uninterruptable power supply systems; adjusting the intake of outside air during hazardous events, such as wildfires; monitoring our delegated sites for any imminent flooding caused by sea level rise; and incorporating acquisition-related climate ready considerations, such as supply



chain risks and climate innovation, into our processes to ensure agency contracting staff include these considerations in agency solicitations and contracts, where applicable.

Our financial risk exposure related to climate change mainly concerns the impact of energy usage to cool and heat our delegated sites. We budget for energy use and utilize previous energy usage data to adjust for the upcoming year for our delegated sites. We also budget for snow removal yearly to ensure employees remain safe and injury free during extreme precipitating events. We potentially face funding challenges if hazardous weather events take place and affect our operations and facilities. These funding challenges include the loss or replacement of facilities, fleet, and information technology equipment, as well as health and safety costs to keep operations active during severe climate-related events.

## **Debt Collection and Management**

#### **Debt Collection**

We have a robust debt collection program to recover all types of OPs, which helps ensure eligible individuals receive the benefits to which they are entitled, and it safeguards the integrity of benefit programs to better serve recipients. We use internal debt collection techniques (i.e., payment withholding and billing/follow-up), as well as external collection techniques authorized by the *Debt Collection Improvement Act of 1996* for OASDI debts and the *Foster Care Independence Act of 1999* for SSI debts.

The balance of delinquent debt for all programs is \$6.916 billion as of September 30, 2024. In FY 2024, we recovered \$4.671 billion using both our internal and external collection tools. Over the last 5 years (FY 2020 through FY 2024), we have collected a total of \$21.468 billion. The following tables provide a description of each of our internal and external debt collection techniques for OASDI and SSI OPs, and a summary of the results.

We recognize how critical it is for the public to understand the information we share, including the IP notices they receive from us. We are working to simplify our OP notices so they are more user-friendly and easier to understand.

Effective March 25, 2024, we changed existing policy and procedure for recovering OASDI OPs. Policy has been to default to full benefit withholding. However, with the change, we began applying a default of 10 percent withholding rate, or \$10 per month, whichever is more, to an overpaid individual. There will be limited exceptions to this change, such as when an OP resulted from fraud.

Additionally, when negotiating a rate of OP recovery, we traditionally required documentation of income and expenses for repayment timeframes that extended beyond 36 months. In February 2024, we changed our policy to extend this timeframe to 60 months and reduced the burden on our beneficiaries to provide additional financial and resource information.



#### **Internal Collections**

We utilize internal collection tools to recover payments of delinquent debt for individuals currently receiving payments. In FY 2024, we recovered \$4.668 billion using our internal collection tools, which accounted for about 99.9 percent of our total collections amount. Over the last 5 years (FY 2020 through FY 2024), we have collected a total of \$21.137 billion using our internal collection tools.

We offer individuals opportunities to ask us questions about their debts, request waivers in certain instances, and request alternative payment plans as needed. We continue working on technological improvements to make it easier for recipients to repay debts.

The following table provides a description of each of our internal debt collection techniques for OASDI and SSI OPs, and a summary of the results.

## FY 2024 Internal Collections (Dollars in Billions)

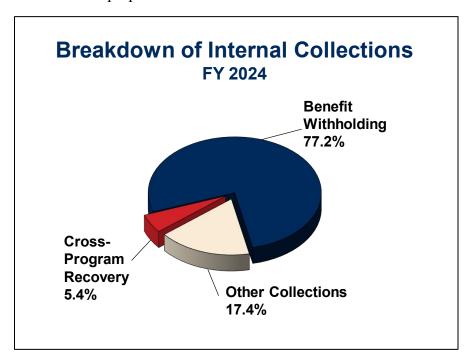
Recovery Method	Description	OASDI	SSI	Total <sup>1</sup>
Benefit Withholding	We withhold some or all benefit payments for OASI and DI beneficiaries and SSI recipients currently receiving payments. Benefit withholding typically accounts for the largest recovery of our total collections amount.	\$2.457	\$1.148	\$3.605
Cross-Program Recovery (CPR)	CPR collects OASDI OPs from monthly SSI payments and UPs, and SSI OPs from monthly OASDI benefit payments and UPs.	\$0.033	\$0.219	\$0.252
Other Collections	These are mostly voluntary payments received because of a notice requesting a refund of an OP.		\$0.341	\$0.811
Total Internal Collections <sup>1</sup>	The total amount recovered by utilizing our internal collection tools.	\$2.960	\$1.708	\$4.668

Note:

<sup>1.</sup> Totals do not necessarily equal the sum of rounded components.



The following chart highlights the allocation of OPs collected in FY 2024 through our various internal collection tools as a proportion of the total \$4.668 billion internal collections amount.





#### **External Collections**

We utilize external collection tools to recover payments of delinquent debt for beneficiaries and recipients no longer receiving payments. In FY 2024, we recovered \$3 million using our external collection tools, which accounted for less than 1 percent of our total collections amount. Over the last 5 years (FY 2020 through FY 2024), we have collected a total of \$321 million using our external collection tools.

Due to the COVID-19 pandemic, in March 2020, we suspended using the Treasury Offset Program (TOP). This suspension continued through FY 2024 and resulted in fewer collections through our external recovery methods.

The following table provides a description of each of our external debt collection techniques for OASDI and SSI OPs, and a summary of the results.

## FY 2024 External Collections<sup>2</sup> (Dollars in Billions)

Recovery Method	Description	OASDI	SSI	Total <sup>1</sup>
ТОР	TOP allows us to collect delinquent debt by tax refund offset, administrative offset, and Federal salary offset.	\$0.000	\$0.000	\$0.000
Administrative Wage Garnishment (AWG)	AWG allows us to recover delinquent OASDI and SSI OPs by ordering a debtor's employer to garnish up to 15 percent of the debtor's private-sector disposable pay (i.e., that part of a worker's total compensation after deduction of health insurance premiums and required deductions).	\$0.002	\$0.000	\$0.003
Total External Collections <sup>1</sup>	The total amount recovered by utilizing our external collection tools.	\$0.002	\$0.000	\$0.003

#### Notes:

- 1. Totals do not necessarily equal the sum of rounded components.
- 2. We use credit bureau reporting, non-entitled debtors, and automatic netting SSI as external collection tools. Collections derived from these recovery methods are subsets of the main recovery methods displayed in the table above. However, we track these collections for informational and decision-making purposes.



## **Debt Management**

The following two tables provide information on our debt management activities. We calculated the data shown in the tables by using accounts receivable amounts taken directly from the financial statements. We provide notes on activity that affected the change in accounts receivable activity between FY 2023 and FY 2024. We provide definitions of certain line items immediately following the Debt Management Activities Program and Administrative Table. For more information on our effort to curb OPs, please refer to the Payment Integrity section.

A design limitation in our Title II system, which is used to support debt management and the reporting of accounts receivable, prevents us from capturing and tracking long-term withholding agreements for debts owed by the public scheduled for collection beyond certain dates. Refer to Note 6, Accounts Receivable, Net, in the *Audited Financial Statements and Additional Information* section for more information.

We estimate that approximately 64,800 debts owed by the public are affected by payment plans extending beyond December 31, 2049. We estimate the total gross value of the post-year 2049 receivable amounts is approximately \$793 million as of September 30, 2024. Additionally, we estimate that approximately 600 debts owed by the public are affected by payment plans extending beyond October 14, 2073. We estimate the total gross value of the post-year 2073 receivable amounts is approximately \$9 million as of September 30, 2024. These amounts are not material to the consolidated financial statements.

The following tables do not include the amounts related to post-year 2049 or 2073 debt. Therefore, the Total New Receivables and Total Write-offs are understated. We are working to address the system limitation; however, the accounts receivable balance reported on the financial statements are presented fairly in all material respects.



## Debt Management Activities Consolidated Program and Administrative<sup>1</sup> (Dollars in Millions)

	FY 2024	FY 2023	FY 2022	FY 2021	FY 2020
Total receivables <sup>2</sup>	\$24,381	\$23,154	\$21,571	\$20,884	\$24,398
New receivables	\$10,491	10,049	8,582	9,061	6,332
Total collections	(4,940)	(4,922)	(4,665)	(4,517)	(4,100)
Adjustments	(926)	(189)	56	(617)	(1,129)
Total write-offs <sup>3</sup>	(3,398)	(3,355)	(3,286)	(7,441)	(2,539)
- Waivers	(303)	(267)	(278)	(281)	(260)
- Terminations	(3,095)	(3,088)	(3,008)	(7,160)	(2,279)
Non delinquent debt	17,464	16,567	15,232	14,833	14,263
Total delinquent debt	\$6,917	\$6,587	\$6,339	\$6,051	\$10,135
Percentage Analysis					
% of outstanding debt:					
- Non delinquent	71.6%	71.6%	70.6%	71.0%	58.5%
- Delinquent	28.4%	28.4%	29.4%	29.0%	41.5%
% of debt estimated to be uncollectible <sup>4</sup>	55.6%	57.3%	57.3%	56.3%	59.2%
% of debt collected	20.3%	21.3%	21.6%	21.6%	16.8%
% change in collections from prior fiscal year	0.4%	5.5%	3.3%	10.2%	-2.7%
% change in delinquencies from prior fiscal year	5.0%	3.9%	4.8%	-40.3%	-11.0%
Clearances as a % of total receivables	34.2%	35.7%	36.9%	57.3%	27.2%
- Collections as a % of clearances	59.2%	59.5%	58.7%	37.8%	61.8%
- Write-offs as a % of clearances	40.8%	40.5%	41.3%	62.2%	38.2%
Other Analysis					
Cost to collect \$1	\$0.08	\$0.085	\$0.06	\$0.07	\$0.06
Average number of months to clear receivables:					
- OASI	13	13	12	13	16
- DI	27	28	30	27	68
- SSI	39	36	45	48	66

#### Notes:

- 1. The consolidated values in the Debt Management activity table above do not necessarily equal the sum of the rounded program/administrative values broken out in the tables below.
- 2. Refer to Note 1, Summary of Signification Accounting Policies, and Note 6, Accounts Receivable, Net, in the *Audited Financial Statements and Additional Information* section for more information.
- 3. Total Write-offs/Terminations Previously, we re-evaluated delinquent and uncollectible debt that we were pursuing, finding them to be largely uncollectible, thereby inefficiently using our processing centers' limited resources. As a result, we wrote-off a portion of our OASI and DI debt during FY 2020 and FY 2021 and wrote-off a portion of our SSI program debt in FY 2021. We developed an automated process to evaluate debt for potential write-offs, which contributed to the write-off values in FY 2021 through FY 2024. The difference between FY 2021 and FY 2020 is primarily the targeted OASI, DI, and SSI write-offs in FY 2021, as both years have incurred write-offs as part of the automated process. By terminating collection activity on uncollectible debt, we are better reflecting current receivables on our financial statements as well as reducing the number of actions from the processing center pending backlog. While this debt is being written-off, it remains available for future collection. We can pursue collection efforts if the debtor becomes entitled to OASDI or SSI benefits.



- 4. Percentage of Debt Estimated to be Uncollected Our allowance for doubtful accounts methodology allows for all delinquent debt two years or older at 100 percent. For remaining debt that is not delinquent two years or more, we apply our uncollectible ratios, consistent with previous years. We add the fully allowed delinquent debt two years and older value to the calculated uncollectible value on the remaining debt to calculate the total allowance for doubtful accounts.
- 5. Cost to Collect \$1 The increase in administrative cost in FY 2023 is due to a change in methodology to include full costing (direct and supporting component costs) versus direct-only costing.

#### Definitions:

- 1. Adjustments Program debt adjustments represent: (a) written-off debts, by way of terminations, that we reinstate for collections; (b) changes in debts when we update debtor accounts with new information; and (c) minor differences between reports containing debt information that we use to maintain an ending accounts receivable balance.
- 2. Waivers Waivers represent the amount of OPs forgiven because the overpaid person: (a) is without fault in causing the debt; and (b) recovery would either defeat the purpose of the *Social Security Act* or be against equity and good conscience. Waivers permanently remove debts from our accounts receivable balance, which precludes any further collection efforts.
- 3. Terminations Terminations represent our decision to cease our own efforts to collect a debt because: (a) the debtor will not repay the debt or alleges they cannot pay the debt; (b) we cannot locate the debtor after diligent search; or (c) the debt is at least two years delinquent. Even though we terminate internal active collection, we may still use external collection efforts. If the debtor becomes entitled to OASDI benefits or eligible for SSI payments, we reinstate the debt and resume recovery through benefit/payment withholding.
- 4. Delinquent Debt A debt is delinquent when no voluntary payment has been made 30 days after the latest of the following: (a) the date we establish an OASDI debt; (b) the date of the initial OP notice for an SSI debt; (c) the date of the last voluntary payment; (d) the date of an installment or periodic payment arrangement (if we do not receive a payment); and (e) the date we decide a debtor remains responsible for a debt, in response to a due process action by the debtor.



# Debt Management Activities Program and Administrative Breakout (Dollars in Millions)

FY 2024						
	OASI	DI	SSI Federal	SSI State	Other	
Total receivables	\$4,262	\$6,351	\$13,200	\$539	\$29	
New receivables	3,507	2,733	4,078	165	8	
Total collections	(2,095)	(1,121)	(1,623)	(85)	(15)	
Adjustments	(213)	551	(1,240)	(23)	(1)	
Total write-offs	(438)	(1,801)	(1,130)	(28)	(1)	
- Waivers	(86)	(116)	(95)	(4)	(1)	
- Terminations	(352)	(1,685)	(1,035)	(24)	-	
Non delinquent debt	3,600	5,255	8,257	325	28	
Total delinquent debt	\$662	\$1,096	\$4,943	\$214	\$1	

FY 2023						
	OASI	DI	SSI Federal	SSI State	Other	
Total receivables	\$3,501	\$5,989	\$13,115	\$510	\$38	
New receivables	3,155	2,522	4,203	160	9	
Total collections	(2,195)	(1,157)	(1,481)	(78)	(11)	
Adjustments	(201)	526	(499)	(15)	-	
Total write-offs	(395)	(1,758)	(1,174)	(28)	(1)	
- Waivers	(73)	(113)	(77)	(3)	(1)	
- Terminations	(322)	(1,645)	(1,097)	(25)	-	
Non delinquent debt	2,851	4,927	8,450	302	37	
Total delinquent debt	\$650	\$1,062	\$4,665	\$208	\$1	



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