

OIG

Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

*Audit Report*

Child Support and the Supplemental  
Security Income Program

*A-01-12-11219 | July 2013*

**OIG** Office of the Inspector General  
SOCIAL SECURITY ADMINISTRATION

**MEMORANDUM**

**Date:** July 25, 2013

**Refer To:**

**To:** The Commissioner

**From:** Inspector General

**Subject:** Child Support and the Supplemental Security Income Program (A-01-12-11219)

The attached final report presents the results of our audit. Our objective was to demonstrate the potential monetary impact if legislation is enacted that allows the Social Security Administration to (1) require that all parents applying for or receiving Supplemental Security Income (SSI) payments on behalf of their children file for child support, if appropriate, and (2) obtain and match State child support data with the SSI rolls to identify unreported child support payments that may impact SSI payments.

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



Patrick P. O'Carroll, Jr.

Attachment

cc:

Kathleen Sebelius, Secretary of the Department of Health and Human Services

# Child Support and the Supplemental Security Income Program

## A-01-12-11219



July 2013

Office of Audit Report Summary

### Objective

To demonstrate the potential monetary impact if legislation is enacted that allows the Social Security Administration (SSA) to (1) require that all parents applying for or receiving Supplemental Security Income (SSI) payments on behalf of their children file for child support, if appropriate, and (2) obtain and match State child support data with the SSI rolls to identify unreported child support payments that may impact SSI payments.

### Background

SSI is intended to be a program of last resort. Therefore, it is important to assess the other benefit programs for which an individual is eligible based on his/her own activities or based on indirect qualification through family circumstances. A recipient is not eligible for SSI if he/she does not apply for all other benefits for which he/she may be eligible; including veterans' compensation, pensions, Social Security benefits, and unemployment insurance benefits. Conversely, children who receive SSI are not required to file for child support benefits, even though filing for child support benefits is a condition of eligibility for income assistance programs such as Temporary Assistance for Needy Families, Medicaid, and Food Stamps.

### Our Findings

SSA could save approximately \$151.2 million, annually, if the number of individuals receiving and/or reporting child support increases by 100,000. Alternatively, SSA could save approximately \$302.4 million, annually, if the number of recipients receiving and/or reporting child support increases by 200,000. These dollar figures are conservative and are greatly reduced from figures we calculated assuming the results from 1999 SSA and Government Accountability Office studies are similar today.

Requiring cooperation with child support enforcement agencies would be consistent with the philosophy that the SSI program should serve as a program of last resort. Such a requirement could increase savings to the SSI program as well as improve the financial status of children receiving SSI.

Improving access to child support data would enhance the integrity of the SSI program by reducing overpayments to children who are receiving child support and help SSA identify unreported child support payments.

### Our Recommendation

We recommend that, in consultation with the Secretary of the Department of Health and Human Services (HHS), SSA consider legislative changes that would (1) require that all parents applying for or receiving SSI payments on behalf of their children under age 18 file for child support, if appropriate, and (2) authorize the Secretary of HHS to match State child support data with the SSI rolls to identify unreported or underreported child support payments which may impact SSI payments.

SSA agreed with our recommendation.

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## **ABBREVIATIONS**

CSE	Child Support Enforcement
FY	Fiscal Year
GAO	Government Accountability Office
HHS	Department of Health and Human Services
OCSE	Office of Child Support Enforcement
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
SSI	Supplemental Security Income
TANF	Temporary Assistance for Needy Families
U.S.C.	United States Code

## OBJECTIVE

Our objective was to demonstrate the potential monetary impact if legislation is enacted that allows the Social Security Administration (SSA) to (1) require that all parents applying for or receiving Supplemental Security Income (SSI) payments on behalf of their children file for child support, if appropriate, and (2) obtain and match State child support data with the SSI rolls to identify unreported child support payments that may impact SSI payments.

## BACKGROUND

SSI is intended to be a program of last resort. Therefore, it is important to determine the other benefit programs for which an individual is eligible based on his/her own activities or based on indirect qualification through family circumstances.<sup>1</sup> A recipient is not eligible for SSI if he/she does not apply for all other benefits for which he/she may be eligible, including veterans' compensation; pensions; workers' compensation payments; Social Security Old-Age, Survivors or Disability Insurance benefits; and unemployment insurance benefits. Conversely, children who receive SSI are not required to file for child support benefits, even though filing for child support benefits is a condition of eligibility for such income assistance programs as Temporary Assistance for Needy Families (TANF), Medicaid, and Food Stamps.<sup>2</sup>

When determining a child's monthly SSI payment, program rules under the *Social Security Act* exclude one-third of a child support payment received from countable income.<sup>3</sup> The remaining child support payment is subject to the \$20 general income exclusion.<sup>4</sup> The balance reduces the child's monthly SSI payment dollar for dollar. See Figure 1 for an example of how child support payments affect SSI payments.

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<sup>1</sup> SSA, POMS, SI 00510.001 A, effective August 5, 2010.

<sup>2</sup> TANF, Medicaid, and Food Stamp program applicants and recipients may not be required to cooperate with Child Support Enforcement (CSE) if they claim to have good cause for refusing to do so and the State agencies administering these programs determine the circumstances claimed make cooperation not in the best interests of the child.

<sup>3</sup> *Social Security Act* § 1612(b)(9), 42 U.S.C. § 1382a(b)(9).

<sup>4</sup> SSA, POMS, SI 00830.050 C2, effective September 27, 2010.

**Figure 1: Computation for Child Support Payments**

Monthly Federal SSI benefit rate for 2013 <sup>5</sup>		\$710.00
Average child support payment for 2011 <sup>6</sup>	\$219.00	
Minus 1/3 of the child support payment	(\$73.00)	
Minus the \$20 general income exclusion	<u>(\$20.00)</u>	
Total countable income (\$219-\$73-\$20)		<u>\$126.00</u>
SSI benefit (\$710-\$126)		<u>\$584.00</u>
Total income available to the child (\$584+\$219)		<u>\$803.00</u>

NOTE: This example assumes the child has no other income and does not include a state supplemental payment.

## Child Support Enforcement

Congress created the CSE program in 1975 to reduce welfare spending and help single parent families achieve or maintain economic self-sufficiency.<sup>7</sup> At the Federal level, the Office of Child Support Enforcement (OCSE) within the Department of Health and Human Services (HHS) has oversight responsibility of the program. All States and territories run a CSE program, usually in the human services department, department of revenue, or State Attorney General's office. CSE's mission is to increase the reliability of child support paid by parents when they live apart from their children by

- locating parents;
- establishing legal fatherhood (paternity);
- establishing and enforcing fair support orders;
- increasing health care coverage for children; and

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<sup>5</sup> SSA, POMS, SI 02001.020 C8, effective October 16, 2012.

<sup>6</sup> SSA, *SSI Annual Statistical Report, 2011*; released September 2012, pg. 50.

<sup>7</sup> *Social Services Amendments of 1974*, Pub. L. No. 93-647, § 101(a), 88 Stat. 2337, 2351 (codified at 42 U.S.C. §§ 651 *et seq.*)

- removing barriers to payment, such as referring parents to employment services, supporting healthy co-parenting relationships, supporting responsible fatherhood, and helping prevent and reduce family violence.

According to OCSE, in Fiscal Year (FY) 2011, there were 15.8 million cases (for 17.3 million children) in the CSE program, and \$27.3 billion was collected.<sup>8</sup>

## Obtaining Child Support Data

When parents who are receiving SSI payments also receive child support for their children, they are required to report the child support to SSA for benefit determinations;<sup>9</sup> however, not all parents do so. The *Social Security Act* prohibits OCSE from providing data to SSA to identify SSI recipients who do not report child support income to the Agency.<sup>10</sup>

While the *Social Security Act* requires that SSA provide Social Security numbers, addresses, and benefit data to OCSE, it does not provide for the disclosure of child support payment records to SSA. Both HHS and SSA OIG legal counsel confirmed that Title IV of the *Social Security Act* prohibits disclosure of payment records to SSA. To perform such a match, Title IV of the *Social Security Act* would need to be amended to allow SSA to use this information. See Appendix A for section 454A of the *Social Security Act*.

## Prior Reports and Studies

Studies indicate that many custodial parents of children on SSI do not pursue child support from the absent parent or do not report the child support payments they receive. For example, an SSA Office of Policy Brief refers to a 1999 SSA study that found, of about 1,500 single-parent households, 47 percent of the custodial parents had not pursued child support, and approximately two-thirds of these households might have received support had they pursued it.<sup>11</sup>

A 1999 Government Accountability Office (GAO) study found that in three of the four States with the largest number of children receiving SSI, about two-thirds of parents did not report child support payments to SSA.<sup>12</sup> The total amount of unreported child support collected by these SSI children was almost \$12 million. As a result, GAO estimated SSA overpaid those children \$7.7 million in SSI payments in 1 year. GAO recommended that Congress amend the *Social Security Act* to require that parents cooperate with applicable CSE services and SSA seek ways

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<sup>8</sup> HHS, OCSE, *FY 2011 Preliminary Report*, October 1, 2012.

<sup>9</sup> SSA, POMS, SI 02301.005 B2, effective November 5, 2007.

<sup>10</sup> *Social Security Act* § 454A, 42 U.S.C. § 654a.

<sup>11</sup> SSA, Office of Policy, Policy Brief No. 2004-02, *Child Support Payments and the SSI Program*, February 2004, pg. 5.

<sup>12</sup> GAO, *Supplemental Security Income: Increase Receipt and Reporting of Child Support Could Reduce Payments* (GAO/HEHS-99-11), January 1999, pgs. 9-10.

of obtaining data on CSE collections. SSA agreed with these recommendations but did not implement either of the recommendations.

We acknowledge the data in these studies were about 14 years old; however, we were unable to obtain more recent data. We found no indication that GAO followed up on its report or that SSA performed any further studies. Also, SSA was only able to locate and provide to us the draft report for its 1999 study; not a final report.<sup>13</sup>

For more current information on SSI recipients, we analyzed data in SSA's *SSI Annual Statistical Report, 2011*.<sup>14</sup> (See Appendix B for additional information about our scope and methodology.)

## RESULTS OF REVIEW

SSA could save approximately \$151.2 million, annually, if the number of individuals receiving and/or reporting child support increases by 100,000. Alternatively, SSA could save approximately \$302.4 million, annually, if the number of recipients receiving and/or reporting child support increases by 200,000. These figures are conservative and are greatly reduced from figures we calculated assuming the results from the 1999 SSA and GAO studies are similar today.

According to SSA, as of December 2011, about 1.3 million children under age 18 were receiving SSI. The Agency reported 857,569, 67 percent, of these children lived in a single-parent household;<sup>15</sup> however, only 175,888 children (13.8 percent) reported receiving child support. This is up from 89,950 (10.6 percent) in December 2000. As of December 2011, the average child support payment was \$219 per month compared to \$182 in December 2000.<sup>16</sup>

Table 1 and the information that follows show how we calculated potential savings. To calculate these potential savings, we used the average child support payment amount of \$219 per month, which would reduce a monthly SSI payment by \$126 because one-third of the child support plus \$20 is excluded from countable income (see Figure 1).

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<sup>13</sup> SSA, Quality Assurance and Performance Assessment, *Interim Draft Report on the Child Support Enforcement Study, Supplemental Security Income (SSI) and Child Support Findings and Preliminary National Study Findings*, October 14, 1998.

<sup>14</sup> SSA, *SSI Annual Statistical Report, 2011*; released September 2012.

<sup>15</sup> Additionally, 264,845 children live in a two-parent household. Some of these children may also be eligible for child support payments because one parent may be a step-parent and the absent parent could owe support.

<sup>16</sup> SSA, *SSI Annual Statistical Report, 2011*; released September 2012, pg. 50 for 2011 figures, and SSA, Office of Policy, Policy Brief No. 2004-002, *Child Support Payments and the SSI Program*, February 2004, pg. 5 for 2000 figures.

**Table 1: Possible Savings if Children Receiving Child Support Increased**

Number of Children on SSI Reporting Receipt of Child Support Income	Amount of SSI Reduction	Monthly Savings to the SSI Program Due to Child Support Income	Additional Monthly Savings Based on Potential Increase in SSI Children Receiving Child Support	Additional Annual Savings Based on Potential Increase in SSI Children Receiving Child Support
175,888 <sup>17</sup>	\$126	\$22,161,888	N/A	N/A
275,888*	\$126	\$34,761,888	\$12,600,000	\$151,200,000
375,888**	\$126	\$47,361,888	\$25,200,000	\$302,400,000

\* increase by 100,000

\*\* increase by 200,000

## Potential Increase in Children Receiving Child Support

Although Table 1 shows possible savings if the number of children with child support income increases by 100,000 and 200,000, we estimate that SSA could see a substantially higher number of children<sup>18</sup> receiving child support based on the following factors.

- We estimated that about 213,000 children may have been eligible for child support payments had their parent pursued it.<sup>19</sup> This number is based on data published in a 1999 SSA study—assuming these statistics hold true today. In this study, SSA reported that 47 percent of custodial parents had not pursued child support, and two-thirds of these households may have received child support had they pursued it.
- We estimated that about 374,000 children (in addition to the 213,000 discussed above) may have had unidentified child support payments.<sup>20</sup> This number is based on data published by GAO in a 1999 report and assumes these statistics held true today. In that report, GAO

<sup>17</sup> According to SSA, 175,888 children receiving SSI also reported child support income; see SSA, *SSI Annual Statistical Report, 2011*; released September 2012, pg. 50.

<sup>18</sup> We estimate that SSA could see approximately 587,000 more children receiving child support based on the information in the two bullets that follow this paragraph [213,000 + 374,000 = 587,000].

<sup>19</sup> We calculated this by subtracting the number of SSI children already reporting receipt of child support (175,888) from the number of children in one parent households (857,569), multiplying this by 47 percent and then multiplying this by two-thirds (based on the SSA study referred to in Office of Policy Brief No. 2004-02, *Child Support Payments and the SSI Program*, February 2004, pg. 5) [(857,569 – 175,888) \* 0.47 \* 2/3 = 213,593].

<sup>20</sup> We calculated this using the 1999 GAO report—*Supplemental Security Income: Increase Receipt and Reporting of Child Support Could Reduce Payments* (GAO/HEHS-99-11), January 1999—that found that 32 percent of children with child support posted to their record is 175,888. Therefore, we determined that 68 percent (without child support posted to their SSA records) would be 373,762 [(175,888 \* 0.68)/0.32 = 373,762].

stated that 68 percent of SSI children receiving child support did not have the child support posted to their SSI record.

## Legal Issues

Title IV of the *Social Security Act* would need to be amended for SSA to obtain child support payment information.<sup>21</sup> HHS oversees Title IV of the *Social Security Act*, and the purpose of Part D of the Title is, in part, to enforce child support obligations owed by non-custodial parents to their children. States maintain child support payment information in their automated child support systems, over which HHS exercises oversight. The law provides for the disclosure of information from the State database to the extent necessary to carry out the IV-D program and to State agencies administering programs under Titles IV, XIX, and XXI of the *Social Security Act*—not Title XVI, which encompasses SSI. Therefore, Title IV would need to be amended to provide for the use of this information by SSA. See Appendix A for section 454A of the *Social Security Act*.

## CONCLUSIONS

Requiring cooperation with CSE agencies would be consistent with the philosophy that the SSI program should serve as a program of last resort. Such a requirement could increase savings to the SSI program but also improve the financial status of children receiving SSI. Improving access to child support data would enhance the integrity of the SSI program by reducing overpayments to children receiving child support and help SSA identify unreported child support payments.

SSA may be able to reduce SSI payments by approximately \$151.2 million, annually, if the number of SSI recipients receiving and/or reporting child support income increased by 100,000. Alternatively, if the number of recipients receiving and/or reporting child support income increased by 200,000, SSA could save approximately \$302.4 million, annually.

## RECOMMENDATION

We recommend that, in consultation with the Secretary of HHS, SSA consider legislative changes that would (1) require that all parents applying for or receiving SSI payments on behalf of their children under age 18 file for child support, if appropriate, and (2) authorize the Secretary of HHS to match State child support data with the SSI rolls to identify unreported or underreported child support payments which may impact SSI payments.

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<sup>21</sup> The disclosure of child support information is currently limited by § 454A of the *Social Security Act*, 42 U.S.C. § 654a.

## AGENCY COMMENT

SSA agreed with our recommendation (see Appendix C).

# *APPENDICES*

## Appendix A – SOCIAL SECURITY ACT SECTION 454A

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### Automated Data Processing

Sec. 454A. [42 U.S.C. 654a] (a) In General.—In order for a State to meet the requirements of this section, the State agency administering the State program under this part shall have in operation a single statewide automated data processing and information retrieval system which has the capability to perform the tasks specified in this section with the frequency and in the manner required by or under this part.

(b) Program Management.—The automated system required by this section shall perform such functions as the Secretary may specify relating to management of the State program under this part, including—

(1) controlling and accounting for use of Federal, State, and local funds in carrying out the program; and

(2) maintaining the data necessary to meet Federal reporting requirements under this part on a timely basis.

(c) Calculation of Performance Indicators.—In order to enable the Secretary to determine the incentive payments and penalty adjustments required by sections [452\(g\)](#) and [458](#), the State agency shall—

(1) use the automated system—

(A) to maintain the requisite data on State performance with respect to paternity establishment and child support enforcement in the State; and

(B) to calculate the paternity establishment percentage for the State for each fiscal year; and

(2) have in place systems controls to ensure the completeness and reliability of, and ready access to, the data described in paragraph (1)(A), and the accuracy of the calculations described in paragraph (1)(B).

(d) Information Integrity and Security.—The State agency shall have in effect safeguards on the integrity, accuracy, and completeness of, access to, and use of data in the automated system required by this section, which shall include the following (in addition to such other safeguards as the Secretary may specify in regulations):

(1) Policies restricting access.—Written policies concerning access to data by State agency personnel, and sharing of data with other persons, which—

(A) permit access to and use of data only to the extent necessary to carry out the State program under this part; and

(B) specify the data which may be used for particular program purposes, and the personnel permitted access to such data.

(2) Systems controls.—Systems controls (such as passwords or blocking of fields) to ensure strict adherence to the policies described in paragraph (1).

(3) Monitoring of access.—Routine monitoring of access to and use of the automated system, through methods such as audit trails and feedback mechanisms, to guard against and promptly identify unauthorized access or use.

(4) Training and information.—Procedures to ensure that all personnel (including State and local agency staff and contractors) who may have access to or be required to use confidential program data are informed of applicable requirements and penalties (including those in section 6103 of the Internal Revenue Code of 1986),<sup>1</sup> and are adequately trained in security procedures.

(5) Penalties.—Administrative penalties (up to and including dismissal from employment) for unauthorized access to, or disclosure or use of, confidential data.

(e) State Case Registry.—

(1) Contents.—The automated system required by this section shall include a registry (which shall be known as the “State case registry”) that contains records with respect to—

(A) each case in which services are being provided by the State agency under the State plan approved under this part; and

(B) each support order established or modified in the State on or after October 1, 1998.

(2) Linking of local registries.—The State case registry may be established by linking local case registries of support orders through an automated information network, subject to this section.

(3) Use of standardized data elements.—Such records shall use standardized data elements for both parents (such as names, social security numbers and other uniform identification numbers, dates of birth, and case identification numbers), and contain such other information (such as on case status) as the Secretary may require.

(4) Payment records.—Each case record in the State case registry with respect to which services are being provided under the State plan approved under this part and with respect to which a support order has been established shall include a record of—

(A) the amount of monthly (or other periodic) support owed under the order, and other amounts (including arrearages, interest or late payment penalties, and fees) due or overdue under the order;

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<sup>1</sup> See Vol. II, Publ. L. No. 83-591, §6103.

(B) any amount described in subparagraph (A) that has been collected;

(C) the distribution of such collected amounts;

(D) the birth date and, beginning not later than October 1, 1999, the social security number, of any child for whom the order requires the provision of support; and

(E) the amount of any lien imposed with respect to the order pursuant to section [466\(a\)\(4\)](#).

(5) Updating and monitoring.—The State agency operating the automated system required by this section shall promptly establish and update, maintain, and regularly monitor, case records in the State case registry with respect to which services are being provided under the State plan approved under this part, on the basis of—

(A) information on administrative actions and administrative and judicial proceedings and orders relating to paternity and support;

(B) information obtained from comparison with Federal, State, or local sources of information;

(C) information on support collections and distributions; and

(D) any other relevant information.

(f) Information Comparisons and Other Disclosures of Information.—The State shall use the automated system required by this section to extract information from (at such times, and in such standardized format or formats, as may be required by the Secretary), to share and compare information with, and to receive information from, other data bases and information necessary to enable the State agency (or the Secretary or other State or Federal agencies) to carry out this part, subject to section 6103 of the Internal Revenue Code of 1986.<sup>2</sup> Such information comparison activities shall include the following:

(1) Federal case registry of child support orders.—Furnishing to the Federal Case Registry of Child Support Orders established under section [453\(h\)](#) (and update as necessary, with information including notice of expiration of orders) the minimum amount of information on child support cases recorded in the State case registry that is necessary to operate the registry (as specified by the Secretary in regulations).

(2) Federal parent locator service.—Exchanging information with the Federal Parent Locator Service for the purposes specified in section [453](#).

(3) Temporary family assistance and medicaid agencies.—Exchanging information with State agencies (of the State and of other States) administering programs funded under part A, programs operated under a State plan approved under title XIX, and other programs designated

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<sup>2</sup> See Vol. II, Pub. L. No. 83-591, §6103.

by the Secretary, as necessary to perform State agency responsibilities under this part and under such programs.

(4) Intrastate and interstate information comparisons.—Exchanging information with other agencies of the State, agencies of other States, and interstate information networks, as necessary and appropriate to carry out (or assist other States to carry out) the purposes of this part.

(5) Private industry councils receiving welfare-to-work grants.—Disclosing to a private industry council (as defined in section [403\(a\)\(5\)\(D\)\(ii\)](#)) to which funds are provided under section [403\(a\)\(5\)](#) the names, addresses, telephone numbers, and identifying case number information in the State program funded under part A, of noncustodial parents residing in the service delivery area of the private industry council, for the purpose of identifying and contacting noncustodial parents regarding participation in the program under section [403\(a\)\(5\)](#).

(g) Collection and Distribution of Support Payments.—

(1) In general.—The State shall use the automated system required by this section, to the maximum extent feasible, to assist and facilitate the collection and disbursement of support payments through the State disbursement unit operated under section [454B](#), through the performance of functions, including, at a minimum—

(A) transmission of orders and notices to employers (and other debtors) for the withholding of income—

(i) within 2 business days after receipt of notice of, and the income source subject to, such withholding from a court, another State, an employer, the Federal Parent Locator Service, or another source recognized by the State; and

(ii) using uniform formats prescribed by the Secretary;

(B) ongoing monitoring to promptly identify failures to make timely payment of support; and

(C) automatic use of enforcement procedures (including procedures authorized pursuant to section [466\(c\)](#)) if payments are not timely made.

(2) Business day defined.—As used in paragraph (1), the term “business day” means a day on which State offices are open for regular business.

(h) Expedited Administrative Procedures.—The automated system required by this section shall be used, to the maximum extent feasible, to implement the expedited administrative procedures required by section [466\(c\)](#).

## Appendix B – SCOPE AND METHODOLOGY

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To accomplish our objective, we:

- Reviewed applicable sections of the *Social Security Act* and the Social Security Administration's (SSA) regulations, policies, and procedures as well as other applicable Federal regulations.
- Reviewed January 1999 Government Accountability Office (GAO) report, *Supplemental Security Income (SSI): Increase Receipt and Reporting of Child Support Could Reduce Payments* (GAO/HEHS-99-11).
- Reviewed February 2004 SSA Office of Policy Brief No. 2004-02, *Child Support Payments and the SSI Program*.
- Reviewed SSA, Quality Assurance and Performance Assessment, *Interim Draft Report on the Child Support Enforcement Study*, October 14, 1998.
- Reviewed Department of Health and Human Services (HHS), Office of Child Support Enforcement, *Fiscal Year 2011 Preliminary Report*, October 1, 2012.
- Obtained information from HHS regarding legal issues with sharing child support data with SSA.
- Analyzed data from SSA's *SSI Annual Statistical Report, 2011*; released September 2012.
- Estimated potential savings to the SSI program based on an increase in children receiving and/or reporting child support payments.
- Provided our savings calculations to SSA's Office of Research, Evaluation, & Statistics for review.

We conducted our review between December 2012 and April 2013 in Boston, Massachusetts. The entity audited was the Office of Legislative Development and Operations under the Office of the Deputy Commissioner of Legislation and Congressional Affairs. We conducted our review in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We did not test the reliability of the data in the GAO and SSA reports we reviewed.

## Appendix C – AGENCY COMMENTS

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### MEMORANDUM

Date: July 11, 2013 Refer To: SIJ-3

To: Patrick P. O'Carroll, Jr.  
Inspector General

From: Kate Thornton /s/  
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Child Support and the Supplemental Security Income Program" (A-01-12-11219)--INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,  
"CHILD SUPPORT AND THE SUPPLEMENTAL SECURITY INCOME PROGRAM"  
(A-01-12-11219)**

**Recommendation 1**

Pursue legislative changes so the agency can (1) require that all parents applying for or receiving SSI payments on behalf of their children under age 18 file for child support, if appropriate, and (2) obtain and match State child support data with the SSI rolls to identify unreported or underreported child support payment which may impact SSI payments.

**Response**

We agree. However, we cannot act alone on a recommendation to “pursue” legislative changes. The decision to “pursue” legislative changes is an Administration decision that involves multiple stakeholder input, including input from the Office of Management and Budget, other agencies, and us. To make this recommendation actionable, please change “pursue” to “consider.” Additionally, please add our suggested language clarifying the Secretary of Health and Human Services (HHS) would need authorization to match the State child support data with the SSI rolls. The revised recommendation would read:

“In consultation with the Secretary of HHS, consider legislative changes that would (1) require that all parents applying for or receiving SSI payments on behalf of their children under age 18 file for child support, if appropriate, and (2) authorize the Secretary of HHS to match State child support data with the SSI rolls to identify unreported or underreported child support payments which may impact SSI payments.”

## Appendix D – MAJOR CONTRIBUTORS

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Judith Oliveira, Director, Boston Audit Division

David Mazzola, Audit Manager

Katie Greenwood, Senior Auditor

Brennan Kraje, Statistician

## MISSION

By conducting independent and objective audits, evaluations, and investigations, the Office of the Inspector General (OIG) inspires public confidence in the integrity and security of the Social Security Administration's (SSA) programs and operations and protects them against fraud, waste, and abuse. We provide timely, useful, and reliable information and advice to Administration officials, Congress, and the public.

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