



# Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

## MEMORANDUM

**Date:** May 8, 2024

**Refer To:** 042301

**To:** Gina Clemons  
Deputy Commissioner  
for Analytics, Review, and Oversight

**From:** Michelle L. Anderson *Michelle L. Anderson*  
Assistant Inspector General for Audit

**Subject:** Using Medicare Claim Data to Identify Deceased Beneficiaries Aged 80 to 89

In lieu of a report, we are issuing this memorandum to inform the Social Security Administration (SSA) of our review of beneficiaries who have not used Medicare Part A or B for longer than 3 years. We are not making a formal recommendation for corrective action; the Agency may act in response to this information as it deems appropriate.

Our objective was to determine whether SSA could identify deceased beneficiaries aged 80 to 89 using its Medicare claims data. We will not perform additional work on this audit because our analysis of Medicare claims data identified a minimal number of deceased individuals aged 80 to 89, and as such, we are focusing our resources on other audits.

SSA's Medicare Non-utilization Project (MNUP) identifies beneficiaries who the Centers for Medicare & Medicaid Services determines have not used Medicare Part A or B for longer than 3 years and (1) are aged 90 and older, (2) are in current pay status, and (3) have a domestic address. MNUP verifies the beneficiary is alive and capable of managing their benefits and ensures program integrity and payment accuracy. SSA reviews the Social Security record of those beneficiaries identified through MNUP and sends the beneficiary or their representative payee, if applicable, an interview notice for a scheduled appointment with the beneficiary. SSA completes the interview either by telephone or at the beneficiary's home. If SSA is unable to locate the beneficiary, it suspends benefits until it is able to locate the beneficiary.<sup>1</sup> If the beneficiary resides in a nursing home, SSA contacts nursing homes to verify a beneficiary is alive, and will begin representative payee development, if necessary, before it suspends benefits.

We identified 12,153 beneficiaries enrolled in Medicare aged 80 to 89 who had not used Medicare Part A or B for 3 years. As of November 15, 2023, these beneficiaries were in current pay status and had no date of death on the Master Beneficiary Record.

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<sup>1</sup> SSA, POMS, GN 02602.630 A.2 (December 3, 2021).

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We obtained data for the 12,153 beneficiaries in our population and conducted the following:

- We matched identifying information<sup>2</sup> for the 12,153 beneficiaries against rejected state death reports provided by State Vital Records Offices to SSA from November 1, 2018 through October 31, 2022. SSA uses state-owned death data to administer its programs, prevent improper payments to deceased individuals, and identify individuals who could be eligible for survivor benefits. SSA rejects death reports that do not pass its verification checks to prevent posting erroneous death information to SSA records.<sup>3</sup> We identified four beneficiaries a state had reported as deceased, but SSA rejected the death report. These beneficiaries remained in current pay status on the record as of March 2024.
- We reviewed a random sample of 50 beneficiaries to determine whether available records contained a date of death. We reviewed SSA's Master Beneficiary Record, Numident, and Supplemental Security Record as well as third-party sites, LexisNexis®, Find a Grave®, and Legacy®, for death information. We identified one beneficiary who may have had two Social Security numbers. SSA indicated the beneficiary was deceased on one record while alive and in current pay on the second record. We did not identify death information for the remaining beneficiaries.

Our Program Audit Division 4 staff will provide the information for these five beneficiaries to SSA. We are making no recommendations that require management's resolution. However, this memorandum is providing information for the Agency to take any action it deems appropriate. If you wish to discuss this memorandum, please contact me or have your staff contact Jennifer Storz, Audit Director, Program Audit Division 4, at [jennifer.storz@ssa.gov](mailto:jennifer.storz@ssa.gov).

cc:  
Trae Sommer

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<sup>2</sup> We matched the Social Security number, last name, first name, middle initial, date of birth, and gender on the state death report to the Numident.

<sup>3</sup> We are conducting an audit of SSA's rejection of state death reports.