



Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

Audit Report

Follow-up: The Social Security
Administration's Implementation of
Mail Procedures

042312 January 2024



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: January 25, 2024

Refer to: 042312

To: Martin O'Malley
Commissioner

From: Gail S. Ennis *Gail S. Ennis*
Inspector General

Subject: Follow-up: The Social Security Administration's Implementation of Mail Procedures

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration's offices were complying with the requirements established in the Agency's Mail Handling Business Process Document.

Please provide within 60 days a corrective action plan that addresses each recommendation. If you wish to discuss the final report, please call me or have your staff contact Michelle L. Anderson, Assistant Inspector General for Audit.

Attachment

Follow-up: The Social Security Administration's Implementation of Mail Procedures 042312



January 2024

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration's (SSA) offices were complying with the requirements established in the Agency's Mail Handling Business Process Document (BPD).

Background

Mail processing at SSA offices is primarily a manual workload. This requires that managers and employees open each mail item, scan the program-related documents into a workload management system, and assign to staff. SSA's regional offices are responsible for monitoring the status of mail handling in their region.

In July 2021, we issued an interim report on *The Social Security Administration's Processing of Mail and Enumeration Services During the COVID-19 Pandemic* that highlighted the exponential increase in the Agency's volume of mail, and SSA did not have detailed policies or performance metrics related to mail processing. In September 2021, SSA issued a Mail Handling BPD that focused on 10 key issues significant to mail processing. In May 2022, we reported on efforts SSA had taken to address our earlier findings; however, we did not verify SSA's new mail procedures worked as intended.

We judgmentally selected and visited 87 SSA offices throughout the continental United States. At each office, we interviewed management and observed the mail handling process.

Results

SSA offices had improved mail processing since our July 2021 review. SSA offices we visited generally complied with the requirements in the Agency's Mail Handling BPD. The BPD provided guidance and direction to help employees effectively process mail. While most offices were meeting the requirements of 6 of the 10 BPD key issues, some offices did not always meet the requirements for the following 4 key issues:

1. Undeliverable returned mail,
2. Remittances and returned unendorsed Department of the Treasury checks,
3. Mail triaging and timeliness, and
4. Scanning mail.

According to 48 (55 percent) of 87 office managers, a staffing shortage was the main cause of delays in mail handling because they had to prioritize servicing in-office customers over processing mail.

SSA recognized the BPD mail-handling timeliness metrics needed to be adjusted to correspond with workloads, and the monitoring process could be enhanced because it did not identify all non-compliant offices that required remediation. SSA stated it is working with the non-compliant offices we identified to determine whether remediation is needed and is continuing with automation initiatives to centralize and digitize mail handling.

Recommendations

1. Evaluate and adjust, where appropriate, the timeliness metrics for mail handling to correspond with, and support, the current mail workload.
2. Evaluate and adjust, where appropriate, the monitoring process for mail handling to better identify non-compliant offices that require remediation.
3. Take action, as needed, for offices we identified as non-compliant with the BPD requirements.

SSA agreed with our recommendations.

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ABBREVIATIONS

BPD	Business Process Document
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
Treasury	Department of the Treasury

OBJECTIVE

To determine whether the Social Security Administration's (SSA) offices were complying with the requirements established in the Agency's Mail Handling Business Process Document (BPD).¹

BACKGROUND

SSA has more than 43,000 employees who work at approximately 1,200 locally based field offices, 8 processing centers, 7 Social Security Card Centers, and Workload Support Units nationwide.² SSA's regional offices are responsible for monitoring how mail is handled in their region. Mail processing at SSA offices is primarily a manual workload, which requires that managers and employees open each envelope or package and scan program-related documents into a workload management system.³ Once they scan the documents, they assign⁴ the work to employees for processing.

Our review of SSA's mail handling during the COVID-19 pandemic determined the volume of mail exponentially increased during the pandemic, and some offices had large backlogs of unprocessed mail. We alerted SSA it did not have comprehensive, specific, or detailed policies; management information; or performance metrics related to how it processed mail.⁵ In September 2021, SSA issued a Mail Handling BPD that focused on 10 key issues⁶ significant to mail processing and SSA's expectations and timeliness. In January 2022, SSA reported approximately 99 percent of its offices met the new timeliness guidelines. In May 2022, we reported on efforts SSA had taken to address our earlier findings; however, we did not verify SSA offices accurately reported the timeliness of their mail workloads or if SSA's new mail procedures worked as intended.⁷

SSA continued developing initiatives to improve its mail-handling process. SSA stated it developed a plan for the Mail Centralization & Digitization project to remove workflow redundancies; automate the assignment, processing, and tracking of incoming mail; and digitize incoming mail.

¹ SSA, *Operations Mail Handling Business Process Document*, September 2021. For this review, we used the revised April 2022 BPD.

² Field offices generally provide the full range of SSA services; processing centers handle complex retirement, survivors, and disability-benefit payment decisions; and card centers process Social Security number applications for residents of specific geographical locations.

³ SSA workload management systems include WorkTrack (used by field offices and Workload Support Units) and Paperless (used by processing centers).

⁴ Before an employee is assigned work, the scanned document(s) is profiled to associate the document received with the customer's assigned Social Security number.

⁵ SSA, OIG, *Interim Report: The Social Security Administration's Processing of Mail and Enumeration Services During the COVID-19 Pandemic*, A-08-21-51036 and A-15-21-51015 (July 2021).

⁶ See Appendix A for a summary of SSA's 10 key areas for mail handling.

⁷ SSA, OIG, *The Social Security Administration's Mail Processing During the COVID-19 Pandemic*, A-08-21-51115 (May 2022).

SCOPE AND METHODOLOGY

To accomplish our objective, we selected a judgmental sample based on high mail volume and processing times in 87 offices throughout the continental United States to conduct our site reviews in February and March 2023. At each site, we interviewed office management and observed the mail processing area. We obtained copies of incoming mail, including original documents from the offices we visited. We traced these documents to SSA's workload management systems to determine whether offices scanned and profiled according to the required timeliness metric. See Appendix B for our audit scope and methodology.

RESULTS OF REVIEW

SSA offices had improved mail processing since our July 2021 review. SSA offices we visited generally complied with the requirements in the Agency's Mail Handling BPD. According to office managers, the procedures and metrics listed in the BPD provide guidance and direction to effectively process mail. While most offices were meeting the requirements of 6 of the 10 BPD key issues, some offices did not always meet the requirements for the following 4 key issues:

1. Undeliverable returned mail,
2. Remittances and returned unendorsed Department of the Treasury (Treasury) checks,
3. Mail triaging and timeliness, and
4. Scanning mail.

According to 48 (55 percent) of 87 office managers, a staffing shortage delayed mail handling because employees had to make servicing in-office customers a priority over processing mail. We did not validate this, but we plan to conduct a separate review of staffing at SSA offices.⁸ SSA is working with the non-compliant offices we identified to determine whether remediation is needed.

SSA recognized the BPD mail-handling timeliness metrics needed to be adjusted to correspond with workloads, and the monitoring process could be enhanced because it did not identify all non-compliant offices that required remediation. SSA established the BPD metrics during the COVID-19 pandemic to help offices reduce their mail backlogs. However, SSA has not revised the metrics since it re-opened its offices to the public in April 2022. According to SSA, it is re-evaluating some of the metrics. SSA's mail-handling process requires that field offices self-report the volume of mail received and whether they are meeting the BPD's timeliness metrics. It is the regional mail coordinators' responsibility to monitor these reports to determine whether remediation is needed. However, they do not verify the accuracy of the information reported.

⁸ Our audit scope did not include a review of SSA's staffing levels.

MAIL-HANDLING REQUIREMENTS

All 87 offices visited complied with SSA's Lost Evidence⁹ and Monitoring the Status of Mail procedures BPD issues.¹⁰ Most offices complied with the Receiving Mail, Opening Mail/Drop Box Items, Unprocessed Social Security Number Applications, and Returning Documents BPD issues. Of the 87 offices visited, the following offices complied with the timeliness metrics established:¹¹

- 86 (98.9 percent) received mail directly from mail carriers,¹²
- 84 (96.6 percent) opened mail within 1 business day of receipt,
- 81 (93.1 percent) processed all Social Security number applications within 5 business days of receipt, and
- 79 (90.8 percent) returned all original primary evidence documents to customers within 3 business days of receipt and kept a log of the returned documents.¹³

Some offices did not always meet the metrics for the undeliverable returned mail, remittances and returned unendorsed Treasury checks, mail triaging and timeliness, and scanning mail BPD key issues. Of the 87 offices:

- 73 (83.9 percent) processed their undeliverable returned mail¹⁴ within 5 business days of receipt, as required. However, the remaining 14 offices had undeliverable returned mail over 30-days-old. Moreover, three of these offices had mail dated back to January 2022, and one with mail dated back to September 2019.¹⁵

⁹ SSA requires that offices receive inquiries from customers regarding potentially lost documents to research, locate, and return the documents. If the offices do not locate the documents, they should pay to replace them. SSA POMS, GN 00301.210.A.5 and B.3 (August 9, 2023).

¹⁰ Managers of sites that receive mail from the public must report the volume of mail received and indicate whether they are meeting each of the timeliness metrics in the BPD each week. Regional mail coordinators are responsible for reviewing these reports to determine where mail backlogs exist and developing a plan to support locations that need help.

¹¹ Some offices were non-compliant with more than one of the timeliness metrics.

¹² SSA, POMS, GN 02403.004.B.1 (September 21, 2012).

¹³ An original is any document the claimant submits as proof of an entitlement factor. SSA, POMS, GN 00301.015 (July 15, 2010) and GN 00301.030 (January 3, 2024). Examples of original documents include birth and marriage certificates, passports, drivers' licenses, and foreign identification or naturalization documents.

¹⁴ SSA, POMS, GN 02605.055.A (July 17, 2023). Some undeliverable returned mail may require development SSA, such as contact notices and Representative Payee Accounting Forms. SSA must have a current address for all beneficiaries so that SSA can contact them when necessary to ensure that entitlements still exist.

¹⁵ We did not ask these offices to open the undeliverable mail. Office managers stated they would open and process the mail as time permits.

- 67 (77 percent) complied with the requirements for remittances and returned unendorsed Treasury checks.¹⁶ Specifically, the offices processed to completion all remittances and returned unendorsed Treasury checks within 1 business day of receipt,¹⁷ recorded receipt in the office's remittance log, and secured¹⁸ checks that could not be processed to completion the same day. The remaining 20 offices¹⁹ had the following issues:
 - 17 did not process remittances within the required timeframe. Of these, 15 offices had checks that remained unprocessed 3 to 31 days after the 1-business-day requirement. Additionally, two offices had unprocessed checks that dated back to July 2020 and November 2021. The banks could return these checks as non-negotiable since they were not endorsed within 6 months, as required by banks.^{20,21}
 - 5 did not use remittance logs, as required.²² In fact, 1 office had 58 checks dating back to October 2022 with no record they existed. The new remittance manager was unaware these unprocessed checks were locked in a safe because they were not recorded in the office's remittance log.
 - 2 did not properly secure the unprocessed checks.²³ For example, 1 office had 77 unprocessed checks that were unsecured and accessible to office staff.
- 36 (41.4 percent) scanned and profiled mail within 5 business days of receipt, as required. The remaining 51 offices, on average, scanned and profiled mail within 10 business days of receipt.²⁴

SSA indicated the timeframes were generally reasonable and allowed for the mail to be processed timely. The offices we visited appeared to have significantly decreased mail backlogs since our May 2022 audit.²⁵ However, SSA has not revised the metrics since it re-opened the offices to the public in April 2022. According to SSA, it is re-evaluating some of the metrics. SSA also continues with automation initiatives to reduce the volume of mail received in its offices. SSA should ensure timeliness metrics effectively correspond with, and support, the current and future mail workload.

¹⁶ We plan to conduct a separate review of processing remittances and unendorsed Treasury checks.

¹⁷ SSA, *Operations Mail Handling Business Process Document*, September 2021. For this review, we used the revised April 2022 BPD.

¹⁸ SSA, *POMS*, GN 02403.004 (September 21, 2012) and GN 02403.002 (April 27, 2018).

¹⁹ Some offices were non-compliant with more than one of the metrics.

²⁰ Uniform Commercial Code, Article 4, Part 4 § 4-404 (2002). SSA, OIG, *The Social Security Administration's National Remittance Process, A-04-16-50111* (March 2017).

²¹ We did not obtain the amounts for the checks during our site visits, because it was not part of our audit's scope.

²² SSA, *POMS*, GN 02403.004.D (September 21, 2012). Two of these five offices were also non-compliant with the timeliness metric. We accounted for the non-compliance only once for these two offices.

²³ These two offices were also non-compliant with the timeliness metric.

²⁴ Mail received and traced included wage information, attorney forms, garnishments, withholding forms, and tax documents.

²⁵ See Footnote 7.

SSA also requires that field offices self-report the volume of mail received and whether they are meeting the BPD's timeliness metrics each week. It is the regional mail coordinators' responsibility to review these reports to determine whether remediation is needed. However, they do not verify the accuracy of the information reported. Additionally, SSA stated it requires that area directors who oversee multiple field offices within a region assess compliance with the mail-handling metrics during an onsite visit at least once a year. SSA has identified and initiated two remediation plans since April 2022. Based on our findings, SSA determined an additional office needed remediation in March 2023. SSA should ensure its procedures effectively monitor the mail handling process.

CONCLUSION

SSA offices had improved mail processing since our July 2021 review. However, the Agency needs to continue monitoring and adapting its oversight of the mail to ensure it meets the needs of the public. This is vital for millions of Americans who depend on SSA to process documents and forms they have mailed to SSA offices, which are necessary to pay benefits, issue Social Security number cards, and provide other services.

RECOMMENDATIONS

We recommend SSA:

1. Evaluate and adjust, where appropriate, the timeliness metrics for mail handling to correspond with, and support, the current mail workload.
2. Evaluate and adjust, where appropriate, the monitoring process for mail handling to better identify non-compliant offices that require remediation.
3. Take action, as needed, for offices we identified as non-compliant with the BPD requirements.

AGENCY COMMENTS

SSA agreed with the recommendations, see Appendix C.



Michelle L. Anderson
Assistant Inspector General for Audit

APPENDICES

Appendix A – MAIL HANDLING BUSINESS PROCESS DOCUMENT

In September 2021, the Social Security Administration (SSA) issued a Mail Handling Business Process Document (BPD) to its offices. The BPD focused on 10 key issues significant to mail processing and SSA's expectations and timeliness, as follows:¹

1. Receiving Mail

- The United States Post Office must deliver all mail directly to an SSA employee.

2. Opening Mail/Drop Box Items

- Employees should open all mail and items from the drop box daily but no later than 1 business day from receipt.

3. Mail Triaging and Timeliness

- Employees should sort the mail by workload type and date received to ensure each piece of mail is handled by its corresponding deadline, based on the following workload-type categories and handling timeframes:
 - Original documents should be returned to customers within 3 business days of receipt.
 - Social Security number applications should be processed within 5 business days of receipt.
 - Remittances and returned unendorsed Department of the Treasury (Treasury) checks should be processed to completion within 1 business day of receipt.
 - Undeliverable mail should be processed within 5 business days of receipt.
 - Time-sensitive requests, such as Title 16 non-medical appeals, must be prioritized to avoid an interruption or reduction in benefits.
 - All other mail should be processed within 5 business days of receipt.

4. Scanning Mail

- SSA offices must scan and profile paper mail within 5 business days of receipt.

5. Unprocessed Social Security Number Applications

- Employees must process all Social Security number applications within 5 business days of receipt.

¹ SSA, *Operations Mail Handling Business Process Document*, September 2021. For this review, we used the revised April 2022 BPD.

6. Remittances and Returned Unendorsed Treasury Checks

- Employees must process remittances and returned unendorsed Treasury checks to completion within 1 business day of receipt.
- If received via mail, the remittances and returned unendorsed Treasury checks must be logged into a remittance log.
- If employees cannot process Treasury checks to completion the same day, they must secure the remittances and returned unendorsed Treasury checks in a safe or lockbox until processed.

7. Returning Documents

- Employees must return all original primary evidence documents to the customer within 3 business days of receipt.

8. Undeliverable/Returned Mail

- Employees are required to process undeliverable mail within 5 business days of receipt.

9. Lost Evidence

- If a customer inquires about potentially lost documents, the employee should research, locate, and return the documents to the customer. If documents cannot be located, SSA must pay the cost to replace the documents.

10. Monitoring the Status of Mail

- Managers of sites that receive mail from the public must report the volume of mail received and whether they are meeting each of the timeliness metrics outlined in the BPD each week. Regional mail coordinators are responsible for reviewing these reports to determine where mail backlogs exist and developing a plan to support locations that need assistance.

Appendix B – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed the Social Security Administration’s (SSA) Mail Handling Business Process Document (BPD).¹
- Retrieved and analyzed data from SSA’s Workload Management Systems (Paperless Processing and WorkTrack)² to identify trends of workload management issues.
- Judgmentally selected and visited 87 SSA offices³ throughout the continental United States:
 - 69 fields offices (selected based on high processing time for mail between September and December 2022),
 - 8 processing centers,
 - 7 Social Security number card centers,
 - 2 Workload Support Units, and
 - The Wabash Mail Center (receives the incoming mail and processes some of the mail for Processing Center 8).⁴
- For each office visited, we:
 - Interviewed managers and staff familiar with mail-related policies and systems to determine whether they had implemented the established goals and metrics in the BPD.
 - Discussed with office managers the cause(s) for inefficiencies related to mail processing and the potential impact on services provided by SSA.
 - Observed the mail process, including office management of backlog mail workloads and undeliverable mail, to determine, if possible, whether the metrics were being met.
 - Obtained copies of incoming mail, including original documents from the offices we visited, and traced the documents to the workload management system to determine whether they were scanned and profiled according to the required timeliness metric.
 - Obtained an update from SSA on initiatives it is pursuing to improve mail processing.

¹ SSA, *Operations Mail Handling Business Process Document*, September 2021. For this review, we used the revised April 2022 BPD.

² Paperless Processing and WorkTrack allow employees and managers to electronically view, track, assign, and transfer documents. Employees at field offices and Workload Support Units manage workloads in WorkTrack. Processing Center employees use Paperless to manage their workloads.

³ When we use the term “offices,” we collectively refer to SSA field offices, processing centers, card centers, Workload Support Units, and the Wabash Mail Center. We visited these offices in February and March 2023.

⁴ Field offices generally provide the full range of SSA services; processing centers handle complex Social Security retirement, survivors, and disability-benefit payment decisions; and card centers process Social Security number applications for residents of specific geographical locations.

We conducted our audit from December 2022 through October 2023 in Atlanta, Georgia. We assessed the reliability of the data by (1) verifying the data and records were within the requested parameters (date range of the mail processed and workload management system codes for the SSA office) and (2) tracing selected mail items to the workload management systems. As a result, we determined the data used in this report were sufficiently reliable given our audit objective's intended use of the data.

We assessed the significance of internal controls necessary to satisfy the audit objective. This included an assessment of the five internal control components, including control environment, risk assessment, control activities, information and communicating, and monitoring. In addition, we reviewed the principle of internal controls associated with the audit objective. We identified the following components and principles as significant to the audit objective:

- Component 3: Control Activities
 - Principle 12: Implement Control Activities
- Component 5: Monitoring
 - Principle 16: Perform Monitoring Activities
 - Principle 17: Remediate Deficiencies

We conducted this performance audit 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 objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: December 28, 2023

Refer To: TQA-1

To: Gail S. Ennis
Inspector C

From: Scott Frey 
Chief of St...

Subject: Office of the Inspector General Draft Report "Follow-up: The Social Security Administration's Implementation of Mail Procedures" (042312) - INFORMATION

Thank you for the opportunity to review the draft report. We appreciate OIG's acknowledgement of the steps we have taken to improve mail processing in our offices. We agree with the recommendations.

Please let me know if I can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.



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