



# Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

## *Audit Report*

### Follow-up on Cost-benefit Analysis of Processing Low-dollar Overpayments

072403 May 2026



# Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

## MEMORANDUM

**Date:** May 6, 2026

**Refer to:** 072403

**To:** Frank Bisignano  
Commissioner

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

**Subject:** Follow-up on Cost-benefit Analysis of Processing Low-dollar Overpayments

The attached final report presents the results of the Office of Audit's review. The objective was to follow up on prior recommendations related to capturing the average cost to collect overpayments and determine whether there are actions the Social Security Administration could take to improve the processing of low-dollar overpayments.

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 Jeffrey Brown, Deputy Assistant Inspector General for Audit.

Attachment

# Follow-up on Cost-benefit Analysis of Processing Low-dollar Overpayments 072403



May 2026

Office of Audit Report Summary

## Objective

To follow up on prior recommendations related to capturing the average cost to collect overpayments and determine whether there are actions the Social Security Administration (SSA) could take to improve the processing of low-dollar overpayments.

## Background

An overpayment occurs when an individual receives a benefit payment greater than the amount to which they are entitled. Regardless of the overpayment amount, SSA generally initiates recovery actions by sending a notice requesting full and immediate refund. SSA may terminate collection, in part, when the cost of collection is likely to exceed the amount recovered.

SSA uses its Cost Analysis System (CAS) to provide the overall average cost to collect overpayments in the Old-Age, Survivors, and Disability Insurance (OASDI) and Supplemental Security Income (SSI) programs. In a prior audit, we found SSA did not use the same methodology to capture the average costs of OASDI and SSI overpayments. Specifically, SSA did not have an estimated cost to collect an SSI overpayment when multiple actions are required. Therefore, we did not review low-dollar SSI overpayments for this audit.

From a population of 3,983 low-dollar OASDI overpayments SSA established between October 1, 2021 through September 30, 2024, we reviewed a sample of 250.

## Results

SSA agreed with our prior recommendations to update its methodology to capture the average cost of collecting overpayments and re-evaluate its process for collecting overpayments where the value of the overpayment is less than what it spends to collect the overpayments. However, as of the date of our review, it had not implemented them. SSA stated it would need to create a new workload tracking system for the SSI program to be consistent with OASDI tracking, but it did not have resources to put toward this effort.

Of the 250 low-dollar OASDI overpayments we reviewed, SSA took actions on 50 (20 percent) that we did not consider cost-beneficial because it sent more notices to the overpaid individuals than required. Since SSA could not provide its average cost to send an overpayment notice, we applied the average cost to collect overpayments as reported in CAS during our audit period, and we did not consider it to have been cost-beneficial to recover these 50 overpayments. Specifically, we estimate SSA spent \$14,492 to attempt to recover the 50 overpayments, which totaled \$8,129.

Projected to our population, we estimated SSA spent \$4.6 million to recover almost 16,000 low-dollar OASDI overpayments totaling almost \$2.6 million. Therefore, we estimate SSA spent about \$2 million more than it would recover.

SSA has the authority to terminate or suspend collection actions when it cannot collect any substantial amount or the cost of collection is likely to be more than the amount it will recover. However, neither SSA's regulations nor policy specify the criteria the Agency or its employees will use to determine when the cost of collection is likely to be more than the amount recovered and therefore collection actions should be terminated or suspended.

## Recommendations

We made four recommendations for SSA to ensure consistency in its methods for calculating the average costs to process overpayments, take appropriate actions for low-dollar overpayments we identified, and update policy to specify the criteria the Agency or its employees shall use to determine when the cost of collection is not cost-beneficial. SSA agreed to implement our recommendations.

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## **ABBREVIATIONS**

CAS	Cost Analysis System
C.F.R.	Code of Federal Regulations
DI	Disability Insurance
FY	Fiscal Year
OASDI	Old-Age, Survivors, and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
ROAR	Recovery of Overpayments, Accounting and Reporting
RSI	Retirement and Survivors Insurance
SSA	Social Security Administration
SSI	Supplemental Security Income
SSR	Supplemental Security Record
U.S.C.	United States Code

## OBJECTIVE

Our objective was to follow up on prior recommendations related to capturing the average cost to collect overpayments and determine whether there are actions the Social Security Administration (SSA) could take to improve the processing of low-dollar overpayments.

## BACKGROUND

Overpayments are made when an individual's benefit payments are greater than the amount to which they are entitled. For Fiscal Year (FY) 2025, SSA reported it processed approximately 2.6 million overpayments and recovered over \$4.4 billion in Old-Age, Survivors, and Disability Insurance (OASDI) and Supplemental Security Income (SSI) overpayments.<sup>1</sup>

### Overpayment Recovery

When SSA determines an individual has been overpaid, it generally initiates recovery actions regardless of the dollar amount. SSA first sends a notice requesting a full and immediate refund and informs the individual of their right to request a waiver and reconsideration.<sup>2</sup> SSA's preferred method of recovery is full and immediate refund.<sup>3</sup> If a full refund is not possible, SSA may recover an overpayment through either of the following methods.

- SSA may withhold all or part of an individual's monthly benefit, decrease a payment from another SSA-administered program, or withhold all or part of the benefits payable to another individual on the same Social Security record.<sup>4</sup>
- When benefit withholding is not possible and an overpaid person cannot make a full refund in a single payment, they may enter into an agreement with SSA to repay the overpayment through monthly installment payments or a compromise settlement.<sup>5</sup>

Active collection is a mandatory debt-collection process that generally consists of billing notices and diary alerts.<sup>6</sup> According to policy, SSA may terminate collection action when the debtor cannot or will not repay, the debtor cannot be located, the cost of collection is likely to exceed the amount recovered, or the debt is delinquent at least 2 years.<sup>7</sup>

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<sup>1</sup> SSA, Cost Analysis System, *SC3-SUM Report*, September 2025 and SSA, *Agency Financial Report Fiscal Year 2025*, p. 197 January 15, 2026.

<sup>2</sup> SSA, *POMS*, GN 02210.001 (June 25, 2024) and GN 02210.150, A (January 27, 2022).

<sup>3</sup> SSA, *POMS*, GN 02210.150, A (January 27, 2022).

<sup>4</sup> SSA, *POMS*, GN 02210.001 (June 25, 2024), GN 02210.008 (March 24, 2003), GN 02205.005, A (December 20, 2012), and GN 02210.015, A.2 (February 13, 2012).

<sup>5</sup> SSA, *POMS*, GN 02210.180, A (October 1, 2025) and GN 02215.100, A (October 3, 2024).

<sup>6</sup> SSA, *POMS*, GN 02215.235, B.1 (November 2, 2021).

<sup>7</sup> SSA, *POMS*, GN 02215.235, C.2 (November 2, 2021).

## Cost Analysis System

The *Social Security Act* authorizes SSA to allocate administrative costs to the trust funds for which it provides administrative support.<sup>8</sup> The cost-allocation process determines actual administrative costs chargeable to trust fund activities, general fund programs, and other reimbursable programs. SSA uses its Cost Analysis System (CAS) to allocate administrative costs to the trust and general fund programs it administers, including the SSI program, Retirement and Survivors Insurance (RSI), and Disability Insurance (DI) programs.<sup>9</sup> CAS provides workload, work year, and administrative cost data needed to accomplish essential cost accounting functions.

CAS includes the overall average cost to collect overpayments in its *SC3-SUM Report* (see Table 1). The average cost considers the costs to process initial overpayments, such as notice preparation, documentation, systems input, and changes to collection methods. We did not independently verify the CAS calculations.

**Table 1: Average Cost to Collect Overpayments by Program per CAS SC3-SUM Report**

FY	RSI	DI	SSI
2022	\$226.27	\$420.86	\$90.18
2023	\$221.94	\$391.25	\$88.33
2024	\$209.56	\$351.65	\$85.48

## Prior Audit

In a July 2015 audit, we found SSA did not use the same methodology to capture the average costs of OASDI and SSI overpayments.<sup>10</sup> The average cost to collect OASDI overpayments reported in CAS included the total cost for all actions related to collecting overpayments from beneficiaries under each program. However, the average cost to collect an SSI overpayment, as reported in CAS, did not represent the cost of collecting the SSI overpayment when multiple actions were required.

We recommended SSA capture in CAS the average cost of collecting an SSI overpayment using a similar methodology as it did for the OASDI program. SSA agreed to implement our recommendation. However, in February 2020, SSA informed us it did not have adequate system resources to implement the recommendation. In addition, SSA did not have plans to change CAS to capture the information needed to implement our second recommendation, which was to re-evaluate its process for collecting overpayments where the value was less than what SSA expended to collect them.

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<sup>8</sup> *Social Security Act* § 201 (g)(1)(A)(ii), 42 U.S.C. § 401 (g)(1)(A)(ii).

<sup>9</sup> Collectively the OASDI program.

<sup>10</sup> SSA, *OIG Cost-benefit Analysis of Processing Low-dollar Overpayments*, A-07-14-14065, (July 2015).

## SCOPE AND METHODOLOGY

To accomplish our objective, we met with SSA subject-matter experts to obtain information on SSA's implementation of prior recommendations related to capturing the average cost to process overpayments. In addition, we obtained populations of OASDI and SSI overpayments SSA established between October 1, 2021 through September 30, 2024. See Appendix A for more details about our scope and methodology.

**OASDI Population:** 59,192 OASDI overpayments from 1 segment of the Recovery of Overpayments, Accounting and Reporting (ROAR) system. Of these, 3,983 were below the average cost to collect per SSA's CAS (see Table 1). We reviewed a random sample of 250 of these low-dollar OASDI overpayments to determine whether the Agency's actions to recover them were cost-beneficial and there were actions the Agency could take to improve how it processed them. We reviewed the following.

- The overpaid individual's current payment status.
- The low-dollar overpayment's outstanding balance as of the date of our review.
- Actions taken on the overpayment, including collections, waivers, and terminations.
- Whether there were other overpayments on the record and, if so, the outstanding balance and status of the other overpayments, which may affect the treatment of the sampled overpayment.

**SSI Population:** 378,470 SSI overpayments from 1 segment of the Supplemental Security Record (SSR), of which 56,890 were below the average cost to collect per CAS. We did not review a sample of low-dollar SSI overpayments because, as identified in our prior audit, SSA did not have an estimated cost to collect each overpayment. Therefore, we would not be able to determine whether the actions SSA took to recover them were cost-beneficial.

## RESULTS OF REVIEW

SSA agreed with our prior recommendations to update its methodology to capture the average cost of collecting overpayments and re-evaluate its process for collecting overpayments where the value of the overpayment is less than what it spends to collect the overpayments. However, as of the date of our review, SSA had not implemented our recommendations. SSA stated it would need to create a new workload tracking system for the SSI program to be consistent with OASDI tracking, but it did not have resources to put toward this effort. Although SSA has not addressed our prior recommendations, we continue to believe there are actions SSA could take to improve the processing of low-dollar overpayments.

For 50 (20 percent) of the 250 low-dollar OASDI overpayments we reviewed, SSA took actions that we did not consider cost-beneficial because it sent more notices to the overpaid individuals than required by policy. We did not consider this cost-beneficial because the overpayment amounts were less than we estimated SSA spent to attempt collection. While the remaining 200 overpayments were also low-dollar, SSA's actions were appropriate because it sent the minimum number of notices required by policy.<sup>11</sup>

## Follow-up on Prior Recommendations

CAS tracks work years, costs, and processed counts then calculates the average unit cost using the same methodology for OASDI and SSI overpayments. However, OASDI and SSI use different systems to obtain data for CAS to determine the average overpayment costs, and each system tracks the processed counts differently. While both systems use workload sampling to derive the work years and costs associated with overpayments for both OASDI and SSI, the calculations SSA performs vary by program.

- For OASDI overpayments, SSA determines the average cost per RSI and DI overpayment by dividing the total processing costs by the number of overpayments. For example, in FY 2024, there were 687,144 RSI overpayments with processing costs totaling \$143,998,608. Therefore, the average cost per RSI overpayment was \$209.56 (see Table 1).
- For SSI overpayments, SSA determines the average cost per action by dividing the total processing costs by the number of actions. Actions include such activities as generating notices and documenting waiver or reconsideration requests. For example, in FY 2024, there were 1,631,672 actions on SSI overpayments with processing costs totaling \$139,468,739. Therefore, the average cost per SSI overpayment was \$85.48 (see Table 1).

According to SSA subject-matter experts, there was no way to determine the average number of actions taken on an SSI overpayment to calculate the average cost using the same methodology for OASDI. Subject-matter experts stated SSA created the SSI workload tracking system when it was making manual inputs from paper forms. SSA would need to create a new system because it could not revise the SSI system to make it consistent with OASDI tracking to address our prior recommendations. As of the date of our review, SSA did not have resources to put toward this effort.

Without improvements, SSA cannot compare the average costs to process overpayments in the OASDI and SSI programs to identify potential inefficiencies in the recovery process. If SSA could compare the average costs of processing overpayments, it would have more accurate information to allocate resources or identify cost savings or efficiencies in overpayment processing and recoveries. The average cost per overpayment provides a complete estimate of overpayment processing that is not captured in an average cost per action.

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<sup>11</sup> 20 C.F.R. §404.527(b)(1) and SSA, *POMS*, NL 00601.040, B.1.h. (January 9, 2015).

## Sample Review of Low-dollar Overpayments

When SSA finds it has overpaid an individual, it sends them a notice as soon as possible. The notice must explain the individual was overpaid; the reason for, and the amount of, the overpayment; and the individual's liability for repayment.<sup>12</sup> For overpayments to individuals who are not receiving benefits, in addition to the original notice, SSA must send a reminder notice and a past-due notice, for a total of three notices.<sup>13</sup> SSA also sends a notice to beneficiaries when SSA takes an action that affects a beneficiary's benefits or status.<sup>14</sup>

Of the 250 overpayments we sampled, SSA took actions on 50 (20 percent) that we did not consider cost-beneficial. For these overpayments, the Agency sent multiple notices—more than required by policy—including billing statements and reminders about electronic payment options, to encourage debtors to repay the overpayments.

- SSA recovered 29 overpayments totaling \$3,968 via remittances or benefit withholding after it sent between 3 and 9 notices.
- For 15 overpayments totaling \$3,027, SSA sent 4 or 5 notices, but these debtors were no longer receiving benefits. Therefore, benefit withholding was not possible, and SSA was not collecting remittances via installment agreements.
- For six overpayments totaling \$1,134, SSA terminated collection activities after sending between four and eight notices.

SSA could not provide us its average cost to send an overpayment notice. Therefore, we applied the average cost to collect overpayments SSA reported in CAS during our audit period (see Table 1) and estimated SSA spent \$14,492 to attempt to recover these 50 overpayments, which totaled \$8,129. Therefore, SSA spent an estimated \$6,363 more than it recovered or could potentially recover.

Based on our sample results, we estimate SSA spent \$4.6 million to recover almost 16,000 overpayments totaling almost \$2.6 million—about \$2 million more than it would potentially recover. See Appendix B for our sampling methodology and results.

SSA has the authority to terminate or suspend collection actions when it cannot collect any substantial amount or the cost of collection is likely to be more than the amount it will recover.<sup>15</sup> For some overpayments, SSA has set administrative tolerances for restricting collection activity based on the amount of the overpayment. For example, SSA will terminate collection activity for an overpayment of \$30 or less when the overpaid individual is not receiving benefits and did not respond to the initial overpayment notice, if no one else is receiving benefits on the payment record.<sup>16</sup> However, SSA has not identified the criteria it should use to determine when the cost of collection is not beneficial. Therefore, SSA's policies do not specify when collection actions

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<sup>12</sup> SSA, *POMS*, GN 02201.009 (June 7, 2024).

<sup>13</sup> 20 C.F.R. § 404.527(b)(1).

<sup>14</sup> SSA, *POMS*, NL 00601.040 (January 9, 2015).

<sup>15</sup> 31 U.S.C. § 3711, 31 C.F.R. part 903, and SSA, *POMS*, GN 02215.235, C.2.c (November 2, 2021).

<sup>16</sup> SSA, *POMS*, GN 02201.013, D.1 (May 28, 2024).

should be terminated or suspended in accordance with its authority to do so based on the cost of collection.

## **CONCLUSION**

SSA should not pursue recovery of overpayments when it is not cost beneficial to do so. However, to determine the cost/benefit of pursuing overpayment recovery, SSA must have relevant cost information. By calculating the average cost to process SSI overpayments using a similar approach as OASDI overpayments, SSA could better identify the cost/-benefit of processing low-dollar overpayments and establish criteria for determining when it is not cost-beneficial to pursue overpayment recovery.

Although SSA did not take actions on our prior recommendations, our sample results reveal a continued need for SSA to identify improvements in the efficiency and cost-effectiveness of its overpayment recovery policy and processes. Improvements will enable SSA to reduce the risk of incurring more costs in attempts to recover low-dollar overpayments than it could actually recover. In addition, SSA could realize better use of resources and potential cost savings.

## **RECOMMENDATIONS**

We recommend SSA:

1. Identify alternative methods for calculating the average cost to process OASDI and/or SSI overpayments to ensure consistency across both programs.
2. Terminate collection activities for the 15 low-dollar overpayments we identified that had not been terminated or collected.
3. Review the remaining population of 3,733 low-dollar OASDI overpayments and terminate collection activities where appropriate.
4. Determine the criteria for when the cost of collection is not cost-beneficial and update policy to specify when collection actions should be terminated or suspended.

## **AGENCY COMMENTS**

SSA agreed to implement our recommendations; see Appendix C.

# ***APPENDICES***

## Appendix A – SCOPE AND METHODOLOGY

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To accomplish our objective, we:

- Reviewed applicable Federal laws and sections of the Social Security Administration’s (SSA) policies, procedures, and training materials related to low-dollar overpayment collections.
- Analyzed SSA’s policies and procedures to determine how it collects low-dollar overpayments.
- Followed up with SSA on its implementation of prior recommendations related to updating the Cost Analysis System (CAS) to capture the average cost to process Supplemental Security Income (SSI) overpayments, including systems limitations.
- Obtained and reviewed cost information from CAS to determine the average cost to process overpayments by fiscal year.
- Obtained a data extract of overpayments SSA established on the Recovery of Overpayments, Accounting and Reporting (ROAR) system and the Supplemental Security Record (SSR) on or after October 1, 2021 through September 30, 2024. From 1 segment of the ROAR<sup>1</sup> and SSR,<sup>2</sup> our populations included
  - 59,192 Old-Age, Survivors, and Disability Insurance (OASDI) overpayments, of which 3,983 were below the average cost to collect per SSA’s CAS and
  - 378,470 SSI overpayments, of which 56,890 were below the average cost to collect per SSA’s CAS.
- Reviewed a random sample of 250 low-dollar OASDI overpayments to determine the extent to which SSA took actions to recover them.<sup>3</sup> We reviewed the following.
  - The overpaid individual’s current payment status.
  - The low-dollar overpayment’s outstanding balance as of the date of our review.

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<sup>1</sup> ROAR controls the recovery and collection activities related to OASDI benefit overpayments. One segment of the ROAR represents 20 percent of the total population of OASDI beneficiaries. However, to ensure consistency with the review of the SSR segment, we selected the Social Security numbers that corresponded with one segment of the SSR. Therefore, for purposes of this review, one segment of the ROAR represents 5 percent of the total population of OASDI beneficiaries.

<sup>2</sup> The SSR is a file of all current and previously entitled SSI recipients. The SSR contains all information necessary to determine eligibility and payment amounts, and it controls the recovery and collection activities related to SSI overpayments. It is divided into 20 equal segments based on the last 2 digits of the Social Security number; thus, 1 segment of the SSR represents 5 percent of the total population of SSI recipients. Because each segment contains similar characteristics, the characteristics of 1 segment are deemed to represent all 20 segments.

<sup>3</sup> SSA does not have an estimated cost to collect an SSI overpayment when multiple actions are required. Therefore, we did not review a sample of low-dollar SSI overpayments because we would not be able to determine whether the actions SSA took to recover them were cost-beneficial.

- Actions taken on the overpayment, including collections, waivers, and terminations.
- Whether there were other overpayments on the record and if so, the outstanding balance and status of other prior overpayments, which may affect the treatment of the sampled overpayment.
- Obtained information from SSA subject-matter experts to gain an understanding of overpayment policies and systems used to determine the average overpayment costs.

We conducted our audit work from March 2025 through February 2026. We assessed the reliability of the data extract provided by conducting electronic testing and reviewing existing information about the data and the system that produced them. We determined the data were sufficiently reliable for the purposes of this report.

The principal entities audited were SSA's Offices of Field Operations, Law and Policy, and the Chief Information Officer. We assessed the significance of internal controls necessary to satisfy the audit objective. This included an assessment of the five internal control components. In addition, we reviewed the principles of internal controls associated with the audit objective. We identified the following components and principles as significant to the audit objective.

- Component 1 – Control Environment
  - Principle 4: Demonstrate commitment to competence
- Component 3 – Control Activities
  - Principle 10: Design control activities
- Component 4 – Information and Communication
  - Principle 13: Use quality information
- Component 5 – Monitoring
  - Principle 16: Perform monitoring activities
  - Principle 17: Evaluate issues and 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 B – SAMPLING METHODOLOGY AND RESULTS

We obtained our Old-Age, Survivors, and Disability Insurance (OASDI) population as detailed in Appendix A. To conduct this review, we used a simple random sample statistical approach. This is a standard statistical approach used to create a sample from a population completely at random. As a result, each sample item had an equal chance of being selected throughout the sampling process, and the selection of one item had no impact on the selection of other items. Therefore, we were guaranteed to choose a sample that represented the population, absent human biases, and ensured statistically valid conclusions of, and projections to, the entire population under review. Our sampling approach for this review ensures our reported projections are statistically sound and defensible.

**Table B–1: Population and Sample Size**

Description	Number of Overpayments
Population Size	3,983
Sample Size	250
Estimated Total Population (Population x 20 segments)	79,660

Of the 250 overpayments sampled, we did not consider the Social Security Administration’s (SSA) actions on 50 (20 percent) cost-beneficial. For these overpayments, the Agency sent multiple notices, including billing statements and reminders about electronic payment options, to encourage debtors to repay the overpayments.

SSA could not provide us the average cost to send an overpayment notice. Therefore, we applied the average cost to collect Retirement and Survivors Insurance (RSI) and Disability Insurance (DI) overpayments (collectively the OASDI program) as SSA reported in its Cost Analysis System (CAS) SC3-SUM report during our audit period.

**Table B–2: Average Cost to Collect Overpayments per CAS SC3-SUM Report**

Fiscal Year	RSI	DI
2022	\$226.27	\$420.86
2023	\$221.94	\$391.25
2024	\$209.56	\$351.65

We estimated SSA spent \$14,492 to attempt to recover these 50 overpayments, which totaled \$8,129. Therefore, SSA spent \$6,363 more than it recovered or could potentially recover. Based on our sample results, we estimate SSA spent \$4,617,860 in its recovery efforts for 15,940 overpayments. We estimate SSA spent about \$2,027,660 more than it would potentially recover.

**Table B-3: OASDI Overpayments**

<b>Description</b>	<b>Overpayments</b>	<b>Cost to Collect</b>	<b>Excess Cost</b>
Sample Results	50	\$14,492	\$6,363
Projected Quantity	797	\$230,893	\$101,383
Projection – Lower Limit	639	\$181,549	\$73,566
Projection – Upper Limit	974	\$280,236	\$129,200
Estimate in 20 Segments (Projected Quantity x 20)	15,940	\$4,617,860	\$2,027,660

Note: All statistical projections are at the 90-percent confidence level.

## Appendix C – AGENCY COMMENTS

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### SOCIAL SECURITY Office of the Commissioner

#### MEMORANDUM

Date: May 1, 2026

Refer To: TQA-1

To: Michelle L. Anderson  
Assistant Inspector General for Audit

A handwritten signature in black ink, appearing to read "Chad Poist".

From: Chad Poist  
Chief Risk Officer

Subject: Office of the Inspector General Draft Report, "Follow-up on Cost Benefit Analysis of Processing Low-dollar Overpayments" (072403) -- INFORMATION

Thank you for the opportunity to review the draft report. We agree with the recommendations.

Please let me know if I can be of further assistance. You may direct staff inquiries to Amy Gao, Director of the Audit Liaison Staff.



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