



Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

Audit Report

The Social Security
Administration's Mail Processing
During the COVID-19 Pandemic

A-08-21-51115 | May 2022



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: May 13, 2022

Refer To: A-08-21-51115

To: Kilolo Kijakazi
Acting Commissioner

From: Gail S. Ennis, 
Inspector General

Subject: The Social Security Administration's Mail Processing During the COVID-19 Pandemic

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration had adequate controls over mail processing during the COVID-19 pandemic.

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

The Social Security Administration's Mail Processing During the COVID-19 Pandemic

A-08-21-51115



May 2022

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) had adequate controls over mail processing during the COVID-19 pandemic.

Background

On March 18, 2020, in response to the COVID-19 pandemic, SSA began limiting in-person services and redirecting most customers to its on-line and telephone services. These limits increased the volume of, and SSA's reliance on, mail. By April 2020, SSA had assigned more than 90 percent of its employees to full-time remote work. Only a small number of employees remained on-site at SSA offices to handle such non-portable work as processing mail.

Mail processing at SSA offices is primarily a manual workload. On-site employees must open and scan program-related mail into a workload management system. Once scanned, remote employees can assign and process the electronic documents. On-site employees must also mail documents printed in the office.

To accomplish our objective, we visited 73 SSA field offices, processing centers, and card centers. We interviewed the office managers, observed mail being processed, documented backlogged mail workloads, and sampled available mail items. We also held discussions, and corresponded, with representatives from the National Council of Social Security Management Associations and other Federal agencies.

Results

SSA lacked adequate controls over mail processing at its field offices, processing centers, and card centers during the COVID-19 pandemic. The Agency lacked (1) management information and performance metrics and (2) comprehensive policies and procedures to track and return original documents. We also identified large backlogs of unprocessed mail at some SSA offices. On July 29, 2021, we issued an interim report notifying Agency officials of our findings so they could begin taking corrective action. Since then, the Agency reported it had eliminated its mail backlogs. We did not re-visit offices to verify that SSA employees had processed the mail backlogs.

Based on our interim report, SSA established procedures and timeliness guidelines to better manage its mail workload. As of January 2022, SSA reported approximately 99 percent of its offices were meeting the new timeliness guidelines. We did not verify that SSA offices accurately reported the timeliness of their mail workloads or that SSA's new mail procedures were working as intended. Representatives from the National Council of Social Security Management Associations indicated its members expressed concern that adhering to the timeliness guidelines adversely affects other workloads.

SSA could implement additional changes to facilitate timely and efficient processing of mail. For example, SSA could reduce manual actions by investing in software or equipment, expanding its use of Post Office Boxes, outsourcing mail duties to contractors, and expanding its use of centralized printing services. SSA could also reduce the volume of mail it sends and receives associated with original documents, forms, correspondences, and undeliverable mail workloads. SSA is considering initiatives to improve its mail processes.

Recommendations

We made eight recommendations for SSA to improve management of mail at its offices. SSA agreed with our recommendations.

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ABBREVIATIONS

| | |
|-----------|---|
| C.F.R. | Code of Federal Regulations |
| EM | Emergency Message |
| Fed. Reg. | Federal Register |
| HHS | Department of Health and Human Services |
| NCSSMA | National Council of Social Security Management Associations |
| OIG | Office of the Inspector General |
| OMB | Office of Management and Budget |
| PC | Processing Center |
| PO | Post Office |
| POMS | Program Operations Manual System |
| SSA | Social Security Administration |
| SSN | Social Security Number |
| U.S.C. | United States Code |
| USPS | United States Postal Service |

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) had adequate controls over mail processing during the COVID-19 pandemic.

BACKGROUND

On March 18, 2020, in response to the COVID-19 pandemic, SSA began limiting in-person services and redirecting most customers to its on-line and telephone services.¹ Before the pandemic began, SSA reported its offices served more than 800,000 visitors per week. As of March 2021, 1 year into the pandemic, SSA stated it was only serving approximately 10,000 visitors per week, a more than 98-percent decrease from pre-pandemic levels. The limits on in-person services increased the volume of, and SSA's reliance on, mail.

SSA has more than 44,000 employees who work at approximately 1,200 locally based field offices, 8 processing centers (PC), 7 Social Security card centers, and support offices nationwide.² By April 2020, SSA had assigned more than 90 percent of its employees to full-time remote work to ensure their safety during the pandemic.³ Only a small number of employees, mostly managers, remained on-site at SSA offices⁴ to handle such non-portable work as processing mail.⁵

In September 2020, SSA provided its Regional Commissioners flexibility to bring a limited number of employees back to work on-site to process non-portable workloads, including mail. In March 2021, SSA revised its guidance to limit in-person staffing in its offices to 25 percent of normal occupancy.⁶ However, most employees did not return to the office before March 30, 2022, and SSA did not resume in-person services until April 7, 2022.

¹ For more information on SSA's telephone services during the COVID-19 pandemic, see SSA, OIG, *The Social Security Administration's Telephone Service Performance, A-05-20-50999* (November 2021).

² Field offices generally offer the full range of SSA services. PCs review and process claims. A card center is a central location for processing of Social Security number (SSN) applications for residents of specific geographical locations.

³ The Office of Management and Budget (OMB) issued a memorandum to heads of Federal agencies consistent with the President's national guidelines for *Opening Up America Again*. Initially, all agencies were to continue maximum telework but could gradually return to normal operations based on conditions in specific geographic areas. OMB, *Aligning Federal Agency Operations with the National Guidelines for Opening up America Again, M-20-23*, p. 4 (April 20, 2020).

⁴ When we use the term "offices," we collectively refer to SSA field offices, PCs, and card centers.

⁵ Other in-office workloads include managing facilities and security and limited appointments for critical issues. Examples of in-office appointments available during the COVID-19 pandemic included processing applications for original SSN cards, issuing immediate payments to beneficiaries with dire needs, and verifying the identities of individuals erroneously recorded as deceased.

⁶ SSA's guidance complied with OMB, *COVID-19 Safe Federal Workplace: Agency Model Safety Principles, M-21-15*, p. 2 (January 24, 2021).

Mail processing at SSA offices is primarily a manual workload. On-site employees must open and scan program-related mail into a workload management system. Once scanned, remote employees can assign and process the electronic documents. Employees working remotely print materials by routing documents to central print vendors or their local office printers. Then, on-site employees manually sort and mail documents printed in the office.

To accomplish our objective, we obtained information on SSA's mail processes and interviewed SSA employees who were experts in mail-related policies and systems. Between April and July 2021, we visited 73 SSA offices. We limited our office visits to field offices, PCs, and card centers.⁷ We interviewed the office managers, observed mail being processed, documented backlogged mail workloads, and sampled available incoming and outgoing mail items. We held a discussion and corresponded with representatives from the National Council of Social Security Management Associations (NCSSMA).⁸ We also interviewed representatives from the Department of State, U.S. Postal Service (USPS) Office of Inspector General, and Treasury Inspector General for Tax Administration to gain an understanding of mail processes at facilities under their respective reviews. See Appendix A for more information on our scope and methodology.

Scope Limitation

Two to 3 weeks before we visited offices from June 17 through July 16, 2021, we notified management of the date and time of our arrival. In some cases,⁹ SSA personnel addressed backlogs in anticipation of our visit, which impaired our ability to gain an understanding of the true state of the Agency's mail and Social Security number (SSN) card operations. We were not assured that what we observed in the selected offices generally represented all offices. Consequently, we do not assert—and the reader should not infer—that our observations represented the conditions in all of SSA offices. To address our concerns, for the remaining offices we visited between July 22 and July 28, 2021, we provided no more than 4 hours' advance notice before we arrived on site.

⁷ We did not randomly select the offices we visited. See Appendix A for information on how we selected the offices.

⁸ NCSSMA is a professional association that comprises approximately 3,400 SSA field office and teleservice center managers. NCSSMA's mission is to improve SSA management and program administration by ensuring the Agency includes the knowledge and experience of front-line management in all phases of planning and decision making.

⁹ We have evidence that SSA employees in two offices took actions to move or process backlogged mail before our visits. For another three offices, we have evidence that SSA employees took actions to prepare for our visits which may have included addressing backlogged mail.

RESULTS OF REVIEW

SSA lacked adequate controls over mail processing in its field offices, PCs, and card centers during the COVID-19 pandemic. The Agency lacked (1) management information and performance metrics and (2) comprehensive policies and procedures to track and return original documents. We also identified large backlogs of unprocessed mail at some SSA offices. On July 29, 2021, we issued an interim report notifying Agency officials of our findings so they could begin taking corrective action.¹⁰ Since then, SSA advised us it had eliminated backlogs of unprocessed mail and established procedures and timeliness guidelines to better manage its mail workload. We did not re-visit offices to verify that SSA employees had processed the mail backlogs or that SSA's new mail procedures were working as intended. We also determined SSA could implement additional changes to facilitate timely and efficient processing of mail.

Management Information and Performance Metrics

SSA did not maintain data on the volume of incoming, outgoing, or pending¹¹ mail. Office managers indicated the volume of mail exponentially increased during the COVID-19 pandemic, but SSA officials were unable to provide us with data to support the managers' assertions. Without this information, SSA management cannot know how much unprocessed mail it has, what is in the mail, or how long it has had the mail. To address this issue, SSA surveyed its office managers to identify mail backlogs and instituted an ongoing process for gathering management information.

Because SSA did not maintain data on mail volumes, it did not have sufficient information to adjust staffing levels or redistribute workloads to ensure mail was processed timely. Managers in five of SSA's eight PC mail centers indicated they did not have sufficient on-site staff to process mail during the pandemic. One PC manager indicated they planned to double on-site staff after SSA removed pandemic restrictions. Another PC manager indicated they would need at least 30 additional employees (more than 40 percent of the mailroom's current workforce) to process mail timely. Managers in many field offices also reported they were overwhelmed by mail duties, and those duties interfered with their managerial responsibilities. In August 2021, SSA advised us it was increasing on-site staff up to 25 percent of normal occupancy, and its Deputy Commissioners could request exceptions to the 25-percent limit as needed to handle the backlog of original documents.¹²

¹⁰ 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).

¹¹ This is mail that SSA employees had opened but not yet uploaded to a workload management system.

¹² SSA's process complied with OMB, *COVID-19 Safe Federal Workplace: Agency Model Safety Principles, M-21-15*, p. 2 (January 24, 2021).

SSA had no performance metrics for mail processing in its offices that are managed by internal staff. However, SSA had an inter-agency agreement with the Department of Health and Human Services (HHS) to perform such mailroom services as receiving, delivering, and metering mail, for its Mid-America PC. The agreement required that HHS process 95 percent of all properly addressed incoming and outgoing mail for SSA within 1 business day.¹³ To address performance metrics issues at other SSA offices, SSA established timeliness guidelines in August 2021. For example, SSA requires that employees open mail within 1 business day of receipt and scan it into a workload management system within 5 business days of receipt. SSA reported that, as of January 2022, approximately 99 percent of its offices were meeting the new timeliness guidelines. (We did not re-visit offices to verify that SSA accurately reported the timeliness of their mail workloads.)

We identified large backlogs of unprocessed mail at some SSA offices, including unopened mail, remittances, unnegotiated benefit checks, documents waiting to be scanned, unprocessed applications for new or replacement SSN cards,¹⁴ and mail the USPS returned to SSA because it was undeliverable. SSA advised us that employees eliminated the mail backlogs by November 2021.¹⁵ To prevent future backlogs, SSA now requires that office managers submit daily reports of the mail counts and indicate whether they are meeting each new timeliness deadline. Regional staff monitors these reports and implements remediation plans to ensure offices with delayed mail processing meet the prescribed deadlines as quickly as possible.

NCSSMA representatives recognized the need for establishing uniform mail handling timeliness guidelines. However, NCSSMA stated it conducted a survey in which members expressed concern that adhering to the guidelines adversely affects other workloads. NCSSMA members indicated that, unless SSA increases staffing levels, prioritizing mail workloads and adding duties associated with tracking original documents, will limit the time employees have to process other critical workloads.

Controls over Original Documents

SSA lacked comprehensive policies and procedures to track and return original documents—including driver's licenses, birth certificates, passports, and naturalization documents—that customers provided as proof of eligibility for benefits or SSN cards. Without effective controls, there is heightened risk that SSA may delay returning or lose sensitive documents. Delays in processing original documents may postpone customers' benefit payments¹⁶ or receipt of their SSN cards. Further, customers may need the documents returned to verify their identities, travel, or conduct other business.

¹³ We visited the office and determined HHS was meeting SSA's performance metric. We also determined SSA had established procedures to monitor compliance with this requirement.

¹⁴ For more information on SSA's enumeration workloads, see SSA, OIG, *The Social Security Administration's Enumeration Services During the COVID 19 Pandemic, A-15-21-51015* (in-progress as of May 2022).

¹⁵ We did not re-visit offices to independently confirm the accuracy of the Agency's assertion.

¹⁶ Benefit payments include those related to initial and post-entitlement determinations for Old-Age, Survivors and Disability Insurance beneficiaries and Supplemental Security Income recipients.

During our office visits, we identified large backlogs of original documents waiting to be processed and returned to customers. For example, 1 PC had more than 9,000 unprocessed original documents that it had received as early as 7 months before we visited. SSA instructed its employees to “make every effort to ensure that the claimant’s document is returned promptly”¹⁷ but had not defined a timeframe for returning documents before our review.

As a result of our review, SSA instituted timeliness guidelines requiring that employees scan and return original documents to customers within 3 business days of receipt. In September 2021, SSA issued instructions requiring that employees return sensitive documents¹⁸ through tracked mail and record the tracking information in a workload management system. These new procedures allow employees to confirm that SSA received and returned the customers’ documents. SSA also instructed employees to discourage customers from mailing important documents and made additional in-office appointments available for customers to present important original documents.¹⁹

Mail Delivery Issues

SSA advised us that its offices experienced inconsistent and untimely mail delivery from the USPS during the pandemic. This resulted in increased workloads for offices once the mail was delivered. In addition, employees at three of the offices we visited reported the USPS or special carriers left mail or packages outside the offices in publicly accessible areas after business hours and over weekends.²⁰ SSA reported it had resolved the delivery issues with the USPS or special carriers at these offices.

Opportunities to Reduce Manual Processing of Mail

Incoming Mail

While some SSA offices use different software and equipment to process incoming mail, most do not have modern software or equipment. SSA should evaluate the cost-effectiveness of investing in software and equipment to help accurately and timely process incoming mail.²¹

¹⁷ SSA, POMS, GN 00301.275, B.1 (April 17, 2012).

¹⁸ Sensitive documents include congressional inquiries, documents from a foreign custodian of record, and other documents that would be costly to replace. Special handling requirements also apply to documents that meet other specified criteria.

¹⁹ SSA, EM-21056, B (September 8, 2021). Important documents include driver’s licenses, passports, and immigration documents.

²⁰ This mail may have included original documents or personally identifiable information.

²¹ We acknowledge that upgrading mail processing software and equipment may not be cost-effective at offices with low mail volumes.

- **Sorting and opening regular mail.** SSA employees in most offices manually sort and open envelopes and extract the contents.²² Available software and equipment can read address and barcode information to sort unopened mail by component or workload. Equipment can also apply date stamps, open envelopes, and extract and scan the envelopes' contents.
- **Controlling tracked mail.** SSA employees at most PCs we visited used manual logs to record information on mail received with tracking numbers.²³ However, hand-held scanners are available for purchase that could improve the efficiency of tracking mail by electronically capturing information and digital signatures. Employees could access the tracking information remotely on commercially or internally developed software.
- **Uploading mail to a workload management system.** Uploading, classifying, and assigning mail to employees in a workload management system is time-consuming. SSA could partially automate this workload by using barcodes and text-recognition software.²⁴ SSA already includes barcodes on certain centrally printed forms and notices. These barcodes contain encrypted data, including the name, address, and SSN. However, only one office has the software and equipment to decrypt the barcodes to text and import the information into a workload management system.²⁵

SSA can reduce the need for employees to manually sort incoming mail by expanding its use of Post Office (PO) Boxes. SSA policy instructs offices to use PO Boxes to the maximum extent possible for long term, high-volume workloads.²⁶ We found some high-volume PC mail centers use PO Boxes to sort incoming mail by component or workload, but not all PCs fully use them. Expanding the use of PO Boxes would provide SSA a relatively low-cost method to receive high-volume workloads separate from the general mail stream.

SSA also has not fully explored the potential benefits of outsourcing mail duties to contractors. SSA uses contractors to process portions of mail workloads for two PCs, thereby reducing the need for SSA employees to take manual actions.²⁷ SSA determined outsourcing mail duties in these PCs would either reduce or maintain existing costs compared with processing mail internally. SSA advised us that regional components decide whether to outsource mail duties at PCs, and the Agency has not conducted national studies about the cost-effectiveness of outsourcing mail duties.

²² We visited one PC that had three machines to open, count, and date stamp mail. Another PC had a machine to open envelopes.

²³ One PC we visited used scanners to automatically upload tracked mail information into commercial software.

²⁴ NCSSMA representatives suggested SSA include barcodes on all forms and letters that will automatically identify and route incoming mail to the correct component when scanned into a workload management system.

²⁵ SSA's Wilkes-Barre Direct Operations Center has scanning equipment and software that converts information encrypted in barcodes on Continuing Disability Review forms into text. SSA uses additional software to import the barcode data into a workload management system for employees to take necessary actions.

²⁶ SSA determined that PO Boxes provide a relatively low-cost method for its offices to receive high volume workloads separate from the general mail stream.

²⁷ SSA contracted mailroom services, including receiving, delivering, and metering mail, for its Mid-America PC to HHS. SSA also contracted with a vendor to manage mail for its Office of Disability Operations.

Outgoing Mail

Multiple SSA applications have central print functionality that eliminates the need for in-office employees to sort and mail notices. SSA instructs employees to route forms and publications to central print vendors to reduce locally printed output when the option is available. However, employees do not always use central print functions. In addition, not all SSA applications allow employees to route notices to the central print vendors. In April 2021 congressional testimony, a former President of NCSSMA encouraged SSA to implement a comprehensive remote printing initiative to direct all field office print traffic to centralized printing locations.²⁸

We analyzed samples of outgoing mail at the field offices we visited to determine the types of notices SSA employees printed and mailed locally and obtained suggestions from NCSSMA on improving centralized printing.²⁹ Approximately 8 percent of outgoing mail included original documents that could not be mailed from centralized printing locations. See Appendix B for information on the outgoing mail we identified in our sample reviews. For the remainder of locally produced mail, SSA should consider expanding centralized print services by:

- making systems default to centralized printing when available;
- including an option to send reply envelopes with centrally printed notices;
- expanding centralized printing of continuing disability review packages; and
- adding options to allow employees to centrally print and mail notices from additional applications.

Agency Initiatives

SSA acknowledges it could improve efficiencies in its mail processes by reducing manual actions. To reduce manual processes, SSA scheduled expansions of centralized printing functions for implementation in Fiscal Year 2022.³⁰ SSA is also exploring options to:

- expand its use of text-recognition software;
- use such mechanisms as artificial intelligence and robotic mail processing; and
- hire a contractor to centralize and digitize mail processes.

²⁸ Senate Committee on Finance, Testimony of former NCSSMA President, *Hearing on Social Security During COVID: How the Pandemic Hampered Access to Benefits and Strategies for Improving Service Delivery*, April 29, 2021.

²⁹ We determined the outgoing mail samples we obtained from PCs did not represent all PC workloads. Therefore, we did not analyze the sampled outgoing mail envelopes obtained from the PCs.

³⁰ SSA established a Central Print Workgroup with an objective to investigate short-, mid-, and long-term solutions to reduce locally printed materials. The Agency added central print functionality to two applications and plans to release the functionality in one more application in Fiscal Year 2022.

Opportunities to Reduce the Volume of Mail

Reliance on Original Documents

Generally, claimants must submit an original document, or a copy certified by the custodian of record, as evidence to support entitlement to benefits.³¹ Obtaining original documents is a labor-intensive process that involves requesting, receiving, certifying, scanning into a workload management system, and returning the evidence. Based on our sample review, approximately 21 percent of PC mail and 39 percent of field office mail appeared to contain original documents.³² Reducing requests for original documents would save postage and labor costs as well as reduce the time it takes employees to process program-related actions. SSA reducing its reliance on original documents would also benefit customers because they sometimes pay fees to obtain these documents.³³

In February 2008, SSA changed its policies to reduce requests for original documents by allowing SSA employees to accept certain claimants' alleged age and citizenship information if it matches that in SSA's systems. SSA could further reduce requests for original documents by applying similar tolerance policies to other forms of information if the alleged information matches information in SSA systems or the Agency determines the likelihood of fraud is low.

SSA has agreements with certain government and private entities to obtain electronic information. For example, SSA employees in some field offices can obtain electronic copies of a customer's birth, marriage, divorce, and death certificates online through their State's Bureau of Vital Statistics. Several SSA managers with whom we spoke expressed a desire for SSA to enter into additional agreements to increase their employees' access to online records and decrease the need to obtain original documents from customers.

³¹ SSA, POMS, GN 00301.015, A (July 15, 2010) and GN 00301.030, A (May 15, 2015) describe acceptable documentary evidence.

³² We did not sample mail from card centers because card center mail is generally for the same workload.

³³ 20 C.F.R. § 422.107(a) requires that documents submitted as evidence for an SSN card be originals or copies of the original documents certified by the custodians of the original records.

Electronic Forms and Correspondences

SSA indicated that electronic correspondences reduce incoming and outgoing mail volumes and save significant time and resources. Expansion of electronic forms and correspondences also supports the Agency's goal to improve customer service through electronic Government.³⁴ SSA has a limited number of electronic forms on its Website that either process actions automatically or upload forms to the appropriate workload management system.³⁵ We analyzed samples of unopened mail from our field office and PC visits and summarize our results in Appendix B. Based on our samples and discussions with SSA managers, we believe the Agency should consider adding online forms to allow:

- beneficiaries living outside the United States to update their account information;
- individuals to apply for underpayments owed on the records of deceased beneficiaries;
- beneficiaries to report pension and workers' compensation information to SSA; and
- disabled beneficiaries to complete SSA's continuing disability review questionnaires.³⁶

SSA employees have limited capabilities to send and receive emails from the public. SSA's eMailer application allows employees to distribute general information to the public via email or text message.³⁷ To protect the public's personal information, the only information an employee can send a customer in an unencrypted email is the recipient's names, information, or documentation SSA needs, and the employee's contact information. Therefore, SSA employees primarily rely on telephone and direct mail contact to obtain customers' private information. Other Federal agencies—including the Internal Revenue Service—use secure electronic messages to correspond with the public.³⁸ Similar secure messaging services would help SSA employees process actions timely and efficiently by avoiding manual actions and delivery times associated with sending and receiving mail through the USPS.

³⁴ 44 U.S.C. § 3601(3) defines electronic government as “. . . the use by the Government of web-based Internet applications and other information technologies . . . to a) enhance the access to and delivery of Government information and services to the public . . .; or b) bring about improvements in Government operations that may include effectiveness, efficiency, service quality, or transformation.”

³⁵ See ssa.gov/forms for a list of available forms and indications whether customers can submit forms online.

³⁶ Beneficiaries who receive continuing disability review mailers from the Wilkes-Barre Direct Operations Center already have the capability to complete the forms online. Similar services are not available for continuing disability review mailers sent from other components, but SSA has scheduled expansion of online continuing disability review forms in Fiscal Year 2022.

³⁷ The “Do Not Reply” email prevents employees from receiving direct responses from the public.

³⁸ The Internal Revenue Service will not initiate email contact without an individual's consent. In addition, the Internal Revenue Service requires that individuals register for secure electronic messaging services before communicating through email.

SSA allows customers to access certain notices online through the *my Social Security* portal and gives them the choice to stop receiving paper versions of some online notices. Individuals with *my Social Security* accounts may opt to receive courtesy notifications via text or email when they receive new correspondences in their accounts.³⁹ However, there are only four types of notices⁴⁰ available online. In congressional testimony, a former President of NCSSMA encouraged SSA to expand its use of electronic notices.⁴¹

Undeliverable Mail

Approximately 6 percent of the mail received in the field offices we visited was returned because it was undeliverable.⁴² Some of the returned undeliverable mail may require such action as suspending or terminating beneficiaries' payments.⁴³ Other returned mail may contain original documents.⁴⁴ Undeliverable mail workloads also have cyclical spikes when SSA sends mass mailings.⁴⁵ One PC manager advised us that, in 2021, their office had to pay employees overtime to process about 300,000 returned notices from mass mailings.

SSA could reduce the undeliverable mail workload by taking steps to ensure it sends mail to the correct addresses.⁴⁶ For example, SSA's enumeration systems use software to validate and correct addresses according to USPS standards before mailing SSN cards. Installing similar software on other SSA systems would reduce mail returned for an invalid address.⁴⁷

³⁹ The courtesy notifications do not indicate the type of notice, only that the customer has new correspondence in their *my Social Security* account.

⁴⁰ The notices are the Cost-of-Living Adjustment, Income-Related Monthly Adjustment Amount Benefit Rate Increase, Recovery and Collection of Overpayment, and Preliminary Claims System Summary of Potential Benefits Notice.

⁴¹ Senate Committee on Finance, Testimony of former NCSSMA President, *Hearing on Social Security During COVID: How the Pandemic Hampered Access to Benefits and Strategies for Improving Service Delivery*, April 29, 2021.

⁴² See Table B-2.

⁴³ SSA, POMS, GN 02605.055 (June 11, 2013) and GN 02605.060 (April 1, 2005) provide guidance on actions that SSA employees should take when they receive undeliverable mail.

⁴⁴ When SSA receives undeliverable mail that contains original documents submitted with an SSN card application, policy instructs Agency employees to conduct follow-up procedures to identify the applicant's current address. If SSA employees cannot obtain a current address, they are to hold the undeliverable mail and shred the contents if they have no further contact with the applicant within 30 days. However, SSA extended the timeframe for shredding the documents to 6 months during the COVID-19 pandemic. SSA, EM-22002 (January 11, 2022).

⁴⁵ Cyclical mass mailings include annual SSA-1099 forms and Cost-of-Living Adjustment notices.

⁴⁶ SSA relies on beneficiaries and representative payees to provide current address information. The Agency also automatically updates addresses for Old-Age, Survivors and Disability Insurance beneficiaries based on the USPS National Change of Address database if certain criteria are met. SSA, POMS, GN 02605.046 (October 4, 2019).

⁴⁷ We may review undeliverable mail in a separate audit.

Agency Initiatives

SSA encourages its employees to send forms and publications through its eMailer program to reduce the volume of printed materials. SSA also established long-term goals to reduce mail volumes by (1) considering policy and operational flexibilities to minimize the number of original documents customers submit through the mail, (2) maximizing use of online services, and (3) exploring technological solutions to improve mail processing. To reduce mail volumes, SSA scheduled expansions of online forms and notices for implementation in Fiscal Year 2022. SSA is also exploring options to:

- allow customers to securely upload documents from their personal devices;⁴⁸
- develop video services that would allow employees to visually inspect original documents;
- add capabilities for customers to electronically sign and submit forms online;
- add capabilities for employees to communicate with customers electronically through secure messages; and
- expand the National Change of Address contract⁴⁹ to update addresses for Supplemental Security Income recipients.

In December 2021, the President issued an executive order⁵⁰ requiring that the Commissioner of Social Security provide a report within 120 days that analyzes services that require original or physical documentation and identifies opportunities for policy reform. The order also requires that the Commissioner develop a mobile-accessible online process to allow customers to upload forms, documents, and evidence. Under this executive order, the Agency must also remove requirements for physical signatures consistent with applicable law and to the extent practicable. We will monitor SSA's actions based on this order and conduct additional reviews if necessary.

⁴⁸ SSA's Mobile Wage Reporting application allows certain Supplemental Security Income recipients to report their wages using a mobile device.

⁴⁹ SSA matches its addresses for Old-Age, Survivors and Disability insurance beneficiaries against the USPS' National Change of Address database four times a year. SSA updates its address records if there is an exact match between the beneficiary's name and current address on SSA records and the prior address on the USPS database.

⁵⁰ *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, Executive Order No. 14058 86 Fed. Reg. 71357 (December 13, 2021).

RECOMMENDATIONS

We recommend SSA:

1. If cost-effective, invest in software and equipment to reduce manual processing of incoming mail.
2. Expand the use of Post Office Boxes for long-term, high-volume workloads.
3. If cost-effective, outsource additional mail duties to contractors.
4. Incorporate centralized printing of forms and notices into SSA's systems modernization efforts.
5. Implement policy and operational changes, where appropriate, to decrease reliance on original documents.
6. Implement options for customers to submit the most frequently used forms online.
7. Implement capabilities for employees to securely correspond with the public electronically.
8. Implement online versions of the most frequently sent notices.

AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix C.



Michelle L. Anderson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed pertinent sections of the Social Security Administration’s (SSA) policies and procedures and applicable regulations.
- Reviewed information from SSA’s Paperless Processing and WorkTrack systems.¹
- Interviewed SSA employees who were experts on mail-related policies and systems.
- Visited 73 SSA offices.² We selected the majority of the offices based on the proximity to an Office of the Inspector General volunteer’s residence, services provided, and size of the field office. We interviewed office managers, observed mail processes, and documented backlogged mail workloads. These offices included:
 - 59 field offices;
 - 8 processing centers (PC)—we also visited 2 of the PCs’ mail processing centers, which were managed by external contractors. The external contractor for one of the PCs also processes mail for SSA’s Headquarters. However, we did not evaluate the contractor’s processing of Headquarters mail; and
 - 6 Social Security card centers.
- We obtained and analyzed samples of incoming mail including:
 - 469 envelopes from 49 field offices³ and
 - 172 envelopes from 7 PCs.⁴
- We obtained 423 samples of outgoing mail envelopes from 47 field offices.⁵ We determined the outgoing mail samples we obtained from PCs did not represent all PC workloads.⁶ Therefore, we did not analyze the sampled outgoing mail envelopes obtained from the PCs.
- Interviewed representatives from the Department of State, U.S. Postal Service Office of Inspector General, and Treasury Inspector General for Tax Administration to obtain an understanding of mail processes at facilities under their respective reviews.
- Held a discussion and corresponded with representatives from the National Council of Social Security Management Associations about SSA’s mail processes.

¹ Paperless and WorkTrack are workload management systems that provide employees and managers the ability to electronically view, track, assign, and transfer documents. Employees at field offices and Social Security card centers manage workloads in WorkTrack. PC employees use Paperless to manage their workloads.

² When we use the term “offices,” we collectively refer to SSA field offices, PCs, and card centers. We did not randomly select the offices we visited.

³ We did not have samples of incoming mail items from 10 field offices we visited. See Appendix B.

⁴ One PC did not have any available incoming mail to sample at the time of our visit. See Appendix B.

⁵ We did not have samples of outgoing mail items from 12 field offices we visited. See Appendix B.

⁶ We based this conclusion on the fact that there was no available outgoing mail at the time of our visit for two of the eight PCs. In addition, other PCs only had available outgoing mail samples from specific components or workloads which were not representative of workloads from the entire PC.

- On July 29, 2021, we issued an interim report to the Acting Commissioner describing critical issues related to policy and practices that affect the timely and efficient processing of mail and enumeration-related work that required immediate attention.⁷
- Identified actions the Agency took to address concerns described in our interim report.

We conducted our audit between April and December 2021, visiting 73 SSA offices throughout the continental United States. We determined the data used for this audit were sufficiently reliable to meet our audit objective. The primary entities audited were the Offices of the Deputy Commissioner for Operations and Budget, Finance, and Management. We assessed the significance of internal controls necessary to satisfy the audit objective. This included an assessment of the five internal control components: control environment, risk assessment, control activities, information and communication, and monitoring. We also reviewed the principles of internal controls associated with the audit objective. We identified three components and three principles as significant to the audit objective.

- Component 1: Control Environment
 - Principle 2: Exercise oversight responsibility
- Component 3: Control Activities
 - Principle 10: Design control activities
- Component 5: Monitoring
 - Principle 16: Perform monitoring activities

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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

SCOPE LIMITATION

Two to 3 weeks before we visited offices from June 17 through July 16, 2021, we notified management of the date and time of our arrival. In some cases,⁸ SSA personnel addressed backlogs in anticipation of our visit, which impaired our ability to gain an understanding of the true state of the Agency's mail and Social Security number card operations. We were not assured that what we observed in the selected offices generally represented all offices. Consequently, we do not assert—and the reader should not infer—that our observations represented the conditions in all of SSA offices. To address our concerns, for the remaining offices we visited between July 22 and July 28, 2021, we provided no more than 4 hours advance notice before we arrived on site.

⁷ SSA, OIG, *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).

⁸ We have evidence that SSA employees in two offices took actions to move or process backlogged mail before our visits. For another three offices, we have evidence that SSA employees took actions to prepare for our visits which may have included addressing backlogged mail.

Appendix B – MAIL WE SAMPLED DURING OFFICE VISITS

We sampled 172 incoming mail items from 7 of 8 Social Security Administration's (SSA) processing centers (PC).¹ The mail samples appeared to contain 53 original documents.² Of the 147 samples with envelopes attached, SSA received 46 (31 percent) in reply envelopes.³ We classified the incoming mail items under the workload categories in Table B-1.

Table B-1: Incoming PC Mail

| Workload Category | Count of Mail Items | Percent of Total |
|---|----------------------------|-------------------------|
| Death Underpayment | 24 | 14 |
| Foreign Development | 23 | 13 |
| Pension Information | 22 | 13 |
| Address Verification | 18 | 10 |
| Medicare | 16 | 9 |
| Other ⁴ | 13 | 8 |
| Workers' Compensation | 13 | 8 |
| Overpayment | 12 | 7 |
| Attorney | 11 | 6 |
| Request for Replacement Social Security Card | 8 | 5 |
| Address Change | 5 | 3 |
| Old-Age, Survivors and Disability Insurance Application | 4 | 2 |
| Representative Payee | 3 | 2 |
| Total | 172 | 100 |

¹ One PC did not have available incoming mail for sampling because employees had processed the mail before we arrived.

² Some sampled envelopes contained multiple original documents.

³ Employees do not have the option to send reply envelopes with correspondences mailed through centralized printing vendors. However, reply envelopes help employees route mail to the appropriate employee or component.

⁴ The "Other" category includes mail workloads with less than three sampled items.

We sampled 469 incoming mail items from 49 field offices.⁵ These mail samples appeared to contain 371 original documents.⁶ Of the 290 samples with envelopes attached, SSA received 79 (27 percent) in reply envelopes. We classified the incoming mail items under the workload categories in Table B–2.

Table B–2: Incoming Field Office Mail

| Workload Category | Count of Mail Items | Percent of Total |
|---|----------------------------|-------------------------|
| Enumeration | 172 | 35 |
| Old-Age, Survivors and Disability Insurance Application | 70 | 14 |
| Other ⁷ | 54 | 11 |
| Supplemental Security Income Application | 32 | 6 |
| Medicare | 31 | 6 |
| Continuing Disability Review | 30 | 6 |
| Undeliverable Mail | 30 | 6 |
| Supplemental Security Income Redetermination | 19 | 4 |
| Representative Payee | 18 | 4 |
| Voluntary Tax Withholding | 16 | 3 |
| Attorney | 15 | 3 |
| Overpayment | 11 | 2 |
| Total | 498⁸ | 100 |

⁵ We did not have samples of incoming mail items from 10 field offices we visited. In general, these offices did not have samples for us to review because employees had processed the mail before we arrived.

⁶ See Footnote 2.

⁷ The “Other” category includes mail we could not classify and workloads with fewer than nine sampled items.

⁸ We sampled 469 incoming mail items, but some envelopes contained multiple documents related to different workloads.

We sampled 423 outgoing mail items from 47 field offices.⁹ We determined the outgoing mail samples we obtained from PCs did not represent all PC workloads.¹⁰ Therefore, we did not analyze the sampled outgoing mail envelopes obtained from the PCs.

We determined that 32 (8 percent) pieces of the outgoing field office mail appeared to contain original documents that could not have been returned from a centralized printing location.¹¹ We also determined an additional 28 (7 percent) of the outgoing mail items contained reply envelopes and therefore could not be sent from a centralized printing location. We classified the outgoing field office mail items under the workload categories in Table B–3.

Table B–3: Outgoing Field Office Mail

| Workload Category | Count of Mail Items | Percent of Total |
|---|----------------------------|-------------------------|
| Old-Age, Survivors and Disability Insurance Application | 78 | 17 |
| Enumeration | 74 | 17 |
| Supplemental Security Income Application | 73 | 16 |
| Appointment | 72 | 16 |
| Supplemental Security Income Redetermination | 35 | 8 |
| Close Out Letter | 24 | 5 |
| Benefit Verification | 20 | 5 |
| Other ¹² | 20 | 5 |
| Representative Payee | 20 | 5 |
| Medicare | 15 | 3 |
| Continuing Disability Review | 13 | 3 |
| Total | 444¹³ | 100 |

⁹ We did not have samples of outgoing mail items from 12 field offices we visited. In general, these offices did not have samples for us to review because employees had processed the mail before we arrived.

¹⁰ We based this conclusion on the fact that there was no available outgoing mail at the time of our visit for two of the eight PCs. In addition, other PCs only had available outgoing mail samples from specific components or workloads, which did not represent workloads from the entire PC.

¹¹ See Footnote 2.

¹² The “Other” category includes mail workloads with less than 10 sampled items.

¹³ We sampled 423 outgoing mail items, but some envelopes contained multiple documents related to different workloads.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: May 9, 2022

Refer To: TQA-1

To: Gail S. Ennis
Inspector General

From: Scott Frey 
Chief of Staff

Subject: Office of the Inspector General Draft Report "The Social Security Administration's Mail Processing During the COVID-19 Pandemic" (A-08-21-51115) — INFORMATION

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

Since the July 29, 2021 interim report, we implemented a number of changes to address the mail backlogs. After working down the backlog, we have continued to monitor the workload to ensure it is handled timely. We are pursuing automation options to improve our mail intake and processing. We are also developing an online process to submit forms and documentation.

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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