



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: June 3, 2022

Refer To: A-06-20-51007

To: Gina Clemons
Deputy Commissioner
Office of Analytics, Review and Oversight

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

Subject: Match of Railroad Retirement Board Death Information Against Social Security Administration Records

We matched Railroad Retirement Board (RRB) death information against Social Security Administration (SSA) records and identified 70 beneficiaries in current payment status whose personally identifiable information matched that of deceased individuals in the RRB data.

In lieu of a report, we are issuing this memorandum to inform the Agency of these cases. We are not making a formal recommendation for corrective action; the Agency can take action in response to this information as it deems appropriate. For example, the Agency may wish to coordinate with RRB to verify these beneficiaries' vital status and—for those confirmed to be deceased—record the deaths on the Numident, terminate benefits, and initiate collection of overpayments.

Our Dallas Audit Division will coordinate with your staff and provide information on these beneficiaries as well as the documentation we obtained that corroborates their deaths. We ask that, if Agency personnel suspect fraud to have occurred, they refer the allegation to our Office of Investigations.

BACKGROUND

The *Railroad Retirement Act* replaces the *Social Security Act* for rail industry employers and employees and provides monthly annuities for employees based on age and service or disability. Effective for entitlement after December 31, 1974, the *Acts* provide that railroad retirement annuities be offset by entitlement to SSA benefits.¹

In most cases where railroad workers are also entitled to Social Security benefits, SSA adjudicates the claims but certifies the payments to the RRB. The RRB then combines RRB and SSA benefits and certifies the payments to the Department of the Treasury (Treasury).

¹ SSA, *POMS*, RS 01601.310, B.1 (April 10, 2017).

SSA reimburses RRB for Social Security benefits RRB certifies to Treasury. By not certifying the SSA payments to Treasury, SSA precludes duplication of payment by both Agencies.² SSA systems use Ledger Account File code “E” to designate Social Security records with payments certified by the RRB.

In cases where SSA has certification responsibility, SSA certifies benefit payments directly to Treasury. SSA systems use Ledger Account File code “C” to designate Social Security records with payments certified by SSA.

We obtained data from the RRB that provided the personally identifiable information of RRB beneficiaries who died through February 2020. We processed the data through SSA’s Enumeration Verification System and against SSA payment records. SSA does not consider RRB death information as verified and will not terminate benefits based on this information without additional verification.³

DECEASED BENEFICIARIES IN CURRENT PAYMENT STATUS

We identified 70 beneficiaries in current payment status whose personally identifiable information matched that of deceased individuals in the RRB data. SSA certified payments⁴ for five beneficiaries and appears to have issued approximately \$480,000 in Old-Age, Survivors and Disability Insurance benefits after their deaths.

- In two cases, public records searches corroborated the beneficiaries’ 2013 and 2020 dates of death. We also obtained the beneficiaries’ obituary and funeral home information.
- In one case, SSA systems contained a January 2020 worksheet noting the beneficiary had Stage 4 cancer and received hospice care. RRB data indicate the beneficiary died in February 2020. SSA issued approximately \$8,300 in payments after death before *suspending* the payments in June 2021.
- In two cases, we did not obtain information corroborating the beneficiaries’ 1997 and 2009 deaths. However, according to dates of birth in SSA records, the beneficiaries would be age 103 and 104,⁵ respectively. Given their advanced ages, it is increasingly likely they are, in fact, deceased.

SSA records indicated RRB certified payments⁶ for the other 65 beneficiaries. We found no record of SSA face-to-face interaction with the beneficiaries after the dates of death the RRB provided.

² See Footnote 1.

³ SSA, *POMS*, GN 02602.050, D (October 30, 2017).

⁴ The beneficiaries’ payment records contained Ledger Account File code “C.”

⁵ SSA suspended the beneficiary’s benefit payments in March 2022.

⁶ The beneficiaries’ payment records contained Ledger Account File code “E.”

- We obtained information from SSA systems⁷ and public records that corroborated 63 of the 65 beneficiaries' deaths.
- Although SSA payment records indicated the beneficiaries were alive and receiving benefit payments, RRB personnel stated that, since the RRB was already aware these beneficiaries were deceased, it stopped certifying their payments to Treasury months or years before. We did not determine whether SSA reimbursed RRB for any payments it certified after these beneficiaries' deaths.

If you wish to discuss this memorandum, please call me or have your staff contact Ron Gunia, Director.

⁷ SSA's Master Beneficiary Record, Numident, IMain Evidence Portal, Shared Processes EVID screen, and information SSA receives from Centers for Medicare & Medicaid Services and the U.S. Department of Veterans Affairs.