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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**FOLLOW-UP: CHILDHOOD CONTINUING  
DISABILITY REVIEWS AND  
AGE 18 REDETERMINATIONS**

September 2011      A-01-11-11118

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**AUDIT REPORT**

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## Mission

By conducting independent and objective audits, evaluations and investigations, we inspire public confidence in the integrity and security of SSA's programs and operations and protect them against fraud, waste and abuse. We provide timely, useful and reliable information and advice to Administration officials, Congress and the public.

## Authority

The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:

- Conduct and supervise independent and objective audits and investigations relating to agency programs and operations.
- Promote economy, effectiveness, and efficiency within the agency.
- Prevent and detect fraud, waste, and abuse in agency programs and operations.
- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.
- Keep the agency head and the Congress fully and currently informed of problems in agency programs and operations.

To ensure objectivity, the IG Act empowers the IG with:

- Independence to determine what reviews to perform.
- Access to all information necessary for the reviews.
- Authority to publish findings and recommendations based on the reviews.

## Vision

We strive for continual improvement in SSA's programs, operations and management by proactively seeking new ways to prevent and deter fraud, waste and abuse. We commit to integrity and excellence by supporting an environment that provides a valuable public service while encouraging employee development and retention and fostering diversity and innovation.



# SOCIAL SECURITY

## MEMORANDUM

Date: September 23, 2011

Refer To:

To: The Commissioner

From: Inspector General

Subject: Follow-up: Childhood Continuing Disability Reviews and Age 18 Redeterminations (A-01-11-11118)

## OBJECTIVE

The objectives of our review were to determine whether the Social Security Administration (SSA) (1) conducted childhood continuing disability reviews (CDR) at least every 3 years for children under age 18 whose impairments were likely to improve in accordance with the *Social Security Act* provisions; (2) conducted age 18 redeterminations before recipients attained age 20; and (3) continued seeking special funding for CDR workloads.

## BACKGROUND

Under Title XVI of the *Social Security Act*,<sup>1</sup> SSA is required to:

1. Perform CDRs at least every 3 years on all children under age 18 whose impairments are likely to improve (or, at the Commissioner's option, recipients whose impairments are unlikely to improve).<sup>2</sup>
2. Redetermine, within 1 year of the individual's 18<sup>th</sup> birthday, the eligibility of any individual who was eligible for Supplemental Security Income (SSI) childhood payments in the month before attaining age 18, by applying the criteria used in determining initial eligibility for individuals who are age 18 or older.<sup>3</sup>

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<sup>1</sup> *Social Security Act* § 1614(a)(3)(H), 42 U.S.C. § 1382c(a)(3)(H).

<sup>2</sup> *Social Security Act* § 1614(a)(3)(H)(ii)(I), 42 U.S.C. § 1382c(a)(3)(H)(ii)(I).

<sup>3</sup> *Social Security Act* § 1614(a)(3)(H)(iii)(II), 42 U.S.C. § 1382c(a)(3)(h), states age 18 redeterminations are to be completed either during the 1-year period beginning on the individual's 18<sup>th</sup> birthday or, in lieu of a CDR, whenever the Commissioner determines an individual's case is subject to a redetermination.

Our 2006 audit found that SSA had not completed all childhood CDRs and age 18 redeterminations in a timely manner.<sup>4</sup> Based on our sample results, SSA did not complete 39 percent of childhood CDRs and 12 percent of age 18 redeterminations timely.<sup>5</sup> Additionally, we estimated SSA

- paid about \$194.7 million in SSI payments to approximately 205,900 recipients under age 18 who should not have been paid and
- paid about \$4.5 million in SSI payments improperly to approximately 5,600 recipients who did not have an age 18 redetermination completed by age 20.

As a result of our prior audit, SSA agreed to

1. conduct childhood CDRs at least every 3 years for children under age 18 whose impairments are likely to improve, in accordance with the *Social Security Act* provisions;
2. conduct age 18 redeterminations before recipients attain age 20; and
3. continue seeking special funding for CDR workloads.

To perform this follow-up review, we analyzed a file of about 1.5 million SSI recipients who were receiving benefits in January 2011 and identified

- 653,478 recipients under age 18 who had been receiving SSI for at least 4 years (childhood CDR cases) and
- 52,073 recipients who were at least age 20 and were receiving SSI before their 18<sup>th</sup> birthday (age 18 redetermination cases).

For each group of recipients, we selected a random sample of 275 cases—for a total of 550 cases. See Appendix B for more information on our scope, methodology, and sample results.

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<sup>4</sup> SSA OIG, *Childhood Continuing Disability Reviews and Age 18 Redeterminations* (A-01-06-21093), December 2006.

<sup>5</sup> We used the same definition of timely for this follow-up review as we did for our December 2006 audit. We considered a childhood CDR timely if SSA completed it within 12 months after the scheduled review date. Additionally, we considered an age 18 redetermination timely if SSA completed it before the recipient attained age 20.

For FY 2009, SSA estimated that the CDR process yielded a savings-to-cost ratio of roughly \$12.50 to \$1. This savings-to-cost ratio encompasses all CDRs—under both the SSI and Old-Age, Survivors and Disability Insurance programs—as well as age 18 redeterminations.<sup>6</sup>

## RESULTS OF REVIEW

During this follow-up review, we determined that SSA had not completed all childhood CDRs and age 18 redeterminations in a timely manner. Based on our sample results, SSA did not complete 79 percent of childhood CDRs and 10 percent of age 18 redeterminations timely. As a result, we estimate:

- SSA paid about \$1.4 billion in SSI payments to approximately 513,300 recipients under age 18 that it should not have paid.<sup>7</sup> Additionally, SSA will continue paying approximately \$461.6 million annually until these reviews are completed.<sup>8</sup>
- SSA improperly paid about \$5.7 million in SSI payments to approximately 5,100 recipients who did not have an age 18 redetermination completed by age 20. Additionally, the Agency will continue paying approximately \$6.3 million annually until these reviews are completed.

## CHILDHOOD CDRs

Table 1 shows the results of the 275 sample cases we reviewed.

Table 1: Childhood CDRs		
Results of Childhood CDRs	Recipients	Percent
CDRs not completed timely	216	78.5%
CDRs not due as of April 2011	58	21.1%
CDRs completed timely	1	0.4%
<b>Total</b>	<b>275</b>	<b>100.0%</b>

<sup>6</sup> SSA, *Annual Report of CDRs, Fiscal Year 2009*, issued February 15, 2011, page 6.

<sup>7</sup> SSA, *Annual Report of the SSI Program*, August 19, 2010, pages 97 and 98, the lowest annual cessation rates after all appeals between FYs 2005 through 2009 were 13.1 percent for childhood CDRs and 29.2 percent for age 18 redeterminations. Therefore, throughout our report, we counted only 13.1 percent of the dollars related to childhood CDRs that were not completed and 29.2 percent of the dollars related to age 18 redeterminations that were not completed. (See Appendix B for additional details on our methodology.)

<sup>8</sup> Our projections for the childhood CDR cases are substantially higher than our 2006 review, as SSA did not initiate CDRs for 201 of our sample CDR cases. In Appendix C, we compare the 275 sample cases from our current review to the sample cases in our 2006 review.

Of the 216 CDRs not completed timely,

- 201 were never initiated;<sup>9</sup>
- 7 had been initiated but not completed as of April 2011; and
- 8 were completed more than 1 year after the scheduled review date—6 had benefits continued and 2 had benefits ceased.

Since the Agency did not complete the CDRs timely, SSA paid about \$583,700 that it should not have paid.<sup>10</sup> Additionally, SSA will continue paying the 208 recipients who did not have CDRs initiated or completed about \$194,200 annually until the CDRs are finished. Examples of childhood CDRs not completed timely include the following.

- SSA scheduled a 12-year-old recipient diagnosed with speech and language delays for a disability review in January 2008. SSA did not initiate the CDR until March 2011—more than 3 years after the scheduled CDR date. As of April 2011, the CDR was still pending a decision. Since February 2009 (1 year after the scheduled CDR date), SSA paid this recipient \$15,800. Additionally, the Agency will continue to pay this recipient about \$6,900 over the next year.
- SSA scheduled a 15-year-old recipient diagnosed with attention deficit disorder for a CDR in May 2007. As of April 2011, SSA had not initiated the CDR. Since June 2008 (1 year after the scheduled CDR date), SSA paid this recipient about \$26,500. Additionally, the Agency will continue paying this recipient about \$8,800 over the next year.

Table 2 shows the timeframe from the scheduled childhood CDR date through the earlier of the CDR completion date or April 2011.

<b>Table 2: Childhood CDRs – Aging Schedule</b>		
<b>Timeframe</b>	<b>Recipients</b>	<b>Percent</b>
5 or more years	63	29.2%
4 years but less than 5 years	48	22.2%
3 years but less than 4 years	51	23.6%
2 years but less than 3 years	30	13.9%
Less than 2 years	24	11.1%
<b>Total</b>	<b>216</b>	<b>100.0%</b>

<sup>9</sup> For two of these cases, SSA did not initiate a childhood CDR; however, the Agency initiated an age 18 redetermination for each case in 2011, and both were pending as of April 2011. One recipient should have had a childhood CDR initiated in June 2005 and the other in December 2006.

<sup>10</sup> Of 216 CDRs that were not completed timely, we did not count dollars for 7 cases—6 continuances and 1 cessation case that was later overturned on appeal. SSA paid the remaining 209 recipients from 1 month to almost 8 years (with a median of almost 3 years) after the Agency should have completed the childhood CDRs.

SSA cited budget constraints, staffing, and capacity issues in the disability determination services for why the Agency had not initiated the CDRs. Additionally, for the reviews initiated but not completed timely, SSA cited field office errors and delays because of other priority workloads and failure to cooperate by the recipient's representative payee.<sup>11</sup>

See Appendix C for a comparison of childhood CDRs in our current review and our December 2006 report.

## AGE 18 REDETERMINATIONS

Table 3 shows the results of the 275 sample cases we reviewed.

Table 3: Age 18 Redeterminations		
Results of Age 18 Redeterminations	Recipients	Percent
Reviews completed timely	248	90.2%
Reviews not completed timely	27	9.8%
<b>Total</b>	<b>275</b>	<b>100.0%</b>

Of the 27 age 18 redeterminations not completed timely,

- 17 had been initiated but not completed as of April 2011,<sup>12</sup> and
- 10 were completed after the recipient's 20<sup>th</sup> birthday—4 had benefits continued and 6 had benefits ceased.

Since SSA did not complete these reviews timely, the Agency paid about \$30,100 that it should not have paid.<sup>13</sup> Additionally, SSA will continue paying the 17 recipients who did not have reviews completed about \$33,200 annually until the reviews are finished.

For example, a recipient diagnosed with an intellectual disability started receiving benefits in 2003 at age 12.<sup>14</sup> SSA initiated an age 18 redetermination in March 2008—2 months before the recipient attained age 18. As of April 2011, the review was still pending because of a field office error, and the child moved three times during the

<sup>11</sup> A representative payee is a person, agency, organization, or institution selected to receive and manage benefits on behalf of a recipient who cannot manage or direct the management of his or her finances because of age, mental, and/or physical impairments. *Social Security Act* §§ 205(j) and 1631(a), 42 U.S.C. §§ 405(j) and 1383(a), and 20 C.F.R. §§ 404.2001-2065 and 416.601-665.

<sup>12</sup> For four of these reviews, SSA stopped the age 18 redetermination without deciding whether to continue paying benefits.

<sup>13</sup> Of the 27 age 18 redeterminations not completed timely, we did not count dollars for the 4 cases in which the decision of the review was a continuance. The remaining 23 recipients were paid from 1 month to 14 months (with a median of 6 months) after the reviews should have been completed.

<sup>14</sup> In accordance with Pub. L. No. 111-256, 124 Stat.2643-2645 (October 2010), the term "intellectual disability" replaces the term "mental retardation."

review process. This recipient had received about \$8,400 since her 20<sup>th</sup> birthday. Additionally, the Agency will continue paying this recipient about \$9,100 over the next year.

SSA stated it did not complete the reviews because of (1) field office error; (2) budget constraints; (3) recipients moving during the review process; (4) fugitive felon issues involving recipients; and (5) failure to cooperate with SSA.

### SPECIAL FUNDING FOR CDR WORKLOAD

In December 2006, we issued our prior review and recommended that SSA continue seeking special funding for CDR workloads. Since that time, SSA has requested special funding for the CDR workload for Fiscal Years (FY) 2009 through 2012.<sup>15</sup> Table 4 shows the amount requested and received for these years. (The special funding SSA receives is for all CDRs, which includes adult CDRs as well as childhood CDRs and age 18 redeterminations.)

Although SSA received additional funding, the number of childhood CDRs conducted in FY 2009 as compared to FY 2005 declined 83 percent.<sup>16</sup> However, the number of age 18 redeterminations SSA conducted increased by 83 percent.<sup>17</sup>

<b>Table 4: Special Funding for CDR and Redetermination Workloads</b>		
<b>FY</b>	<b>Requested</b>	<b>Received</b>
2009	\$240,000,000	\$240,000,000
2010	\$485,000,000	\$485,000,000
2011	\$513,000,000	\$484,030,000
<b>Sub-Total</b>	<b>\$1,238,000,000</b>	<b>\$1,209,030,000</b>
2012	\$623,000,000	To be determined <sup>18</sup>
<b>Total</b>	<b>\$1,861,000,000</b>	

<sup>15</sup> SSA did not request special funding in FY 2008, as the budget for FY 2008 was submitted in February 2007, which was only a couple months after we issued our report.

<sup>16</sup> In FY 2005, SSA conducted 61,387 childhood CDRs compared to only 10,637 conducted in FY 2009. SSA, *Annual Report of the SSI Program*, August 19, 2010, page 97.

<sup>17</sup> In FY 2005, SSA conducted 55,331 age 18 redeterminations, and in FY 2009, the number of these reviews increased to 100,986. SSA, *Annual Report of the SSI Program*, August 19, 2010, page 97.

<sup>18</sup> As of August 2011, Congress had not acted on the FY 2012 request. Therefore, SSA does not know if it will receive the special CDR funding it requested.

Furthermore, Table 5 shows the number of childhood CDRs and age 18 redeterminations conducted from FY 2000 to May 2011.<sup>19</sup>

<b>Table 5: Childhood CDRs and Age 18 Redeterminations Conducted</b>		
<b>FY</b>	<b>Childhood CDRs</b>	<b>Age 18 Redeterminations</b>
2000	140,699	51,713
2001	95,835	48,944
2002	163,768	54,947
2003	127,444	53,905
2004	103,437	53,232
2005	61,387	55,331
2006	19,384	40,640
2007	4,440	71,359
2008	4,707	69,430
2009	10,637	100,986
2010	16,677	87,310
2011 (through May)	18,679	64,182
<b>Total</b>	<b>767,094</b>	<b>751,979</b>

Overall, SSA has decreased the number of childhood CDRs conducted since FY 2000. However, the number has been steadily increasing since FY 2009, which was the first year since our last review that SSA received special funding. As of May 2011, the Agency surpassed the number of childhood CDRs conducted in FY 2010.

## **CONCLUSION AND RECOMMENDATION**

Overall, SSA did not comply with the childhood CDR and age 18 redetermination provisions in the *Social Security Act*, which require these reviews within specific timeframes. Based on our sample results, the Agency did not complete 79 percent of childhood CDRs and 10 percent of age 18 redeterminations timely.

CDRs and redeterminations are key activities in ensuring the integrity of the SSI program and maintaining and improving payment accuracy. By conducting these reviews timely, SSA can identify recipients no longer eligible to receive disability benefits and stop their payments, thus protecting taxpayer dollars.

<sup>19</sup> SSA, *Annual Report of Continuing Disability Reviews*, FYs 2000 through 2009. SSA's Office of Quality Performance provided the information for FYs 2010 and 2011.

According to SSA, budget constraints and other priority workloads have forced the Agency to shift focus from conducting childhood CDRs and age 18 redeterminations. However, the Agency should make every effort to complete these reviews when they come due, to comply with the provisions of the *Social Security Act*.

We recommend SSA conduct childhood CDRs and age 18 redeterminations within the specific timeframes provided for in the *Social Security Act*.

## **AGENCY COMMENTS**

SSA agreed to conduct childhood CDRs and age 18 redeterminations as its budget and other priority workloads will allow. (See Appendix D.)

A handwritten signature in black ink, appearing to read "Patrick P. O'Carroll, Jr.", with a stylized flourish at the end.

Patrick P. O'Carroll, Jr.

# Appendices

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APPENDIX A – Acronyms

APPENDIX B – Scope, Methodology, and Sample Results

APPENDIX C – Comparison of Sample Cases for Childhood Continuing Disability  
Reviews from Current Review to Prior Review

APPENDIX D – Agency Comments

APPENDIX E – OIG Contacts and Staff Acknowledgments

## Acronyms

CDR	Continuing Disability Review
FY	Fiscal Year
OIG	Office of the Inspector General
SSA	Social Security Administration
SSI	Supplemental Security Income

# Scope, Methodology, and Sample Results

To accomplish our objective, we:

- Reviewed applicable sections of the *Personal Responsibility and Work Opportunity Reconciliation Act of 1996* (Public Law 104-193, 110 Stat. 2105), the *Social Security Act*, and Social Security Administration (SSA) regulations, rules, policies, and procedures.
- Reviewed a prior Office of the Inspector General report.
- Obtained a file of all Supplemental Security Income (SSI) recipients who were under age 21 and receiving benefits in January 2011. We tested the data obtained for our audit for accuracy and completeness and determined them to be sufficiently reliable to meet our audit objectives. From this file, we identified 2 populations:
  - 653,478 recipients under age 18 with a date of birth after April 1, 1993 and an application date of January 1, 2007 or earlier (childhood continuing disability review [CDR] cases).
  - 52,073 recipients over age 18 with a date of birth between January 1, 1990 and December 31, 1990 (age 18 redetermination cases).

For each population, we selected a random sample of 275 cases—for a total of 550 cases—and projected our sample results to each population.

For the childhood CDR cases, we determined whether SSA completed a CDR timely. Specifically, we:

1. Reviewed SSA's systems, including the Supplemental Security Record, Disability Control File, and Disability Determination Service Query to obtain each individual's scheduled disability review date. If the scheduled disability review date was unavailable, we used 3 years after the most recent determination, which could have been an allowance or CDR continuance.
2. Determined whether SSA completed the childhood CDRs timely (no later than 12 months after the individual's scheduled disability review date).

For age 18 redetermination cases, we determined whether SSA completed a redetermination timely (by the recipient's 20<sup>th</sup> birthday).

- Referred cases to SSA in which childhood CDRs and age 18 redeterminations were not initiated, were still pending, or were stopped without a decision to determine why these reviews were not completed.
- Quantified for each sample case:
  1. The amount of SSI payments issued because SSA did not complete a childhood CDR timely. Specifically, we quantified:
    - a. The amount of SSI payments issued between the 1-year anniversary of the scheduled disability review date and the earlier of the month of cessation or April 2011 (the date we reviewed the case).
    - b. The amount of SSI payments the Agency could have continued to pay over a 12-month period when a CDR was not completed. To calculate this amount, we multiplied the amount of the April 2011 payment by 12.
  2. The amount of SSI payments issued because SSA did not complete an age 18 redetermination timely. Specifically, we quantified:
    - a. The amount of SSI payments issued between the date the individual turned 20 and the earlier of the month of cessation or April 2011 (the date we reviewed the case).
    - b. The amount of SSI payments the Agency could have continued to pay over a 12-month period when an age 18 redetermination was not completed. To calculate this amount, we multiplied the amount of the April 2011 payment by 12.
- Obtained disability cessation rates resulting from childhood CDRs and age 18 redeterminations from the SSI annual report.<sup>1</sup> The lowest annual cessation rates after all appeals between Fiscal Years 2005 through 2009 were 13.1 percent for childhood CDRs and 29.2 percent for age 18 redeterminations. See the tables on the following page.

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<sup>1</sup> SSA, *Annual Report of the Supplemental Security Income Program*, August 2010, pages 97 and 98.

Childhood CDRs			
FY	Total CDRs	Cessations After All Appeals <sup>2</sup>	Percent
2005	61,387	11,855	19.3%
2006	19,384	3,716	19.2%
2007	4,440	910	20.5%
2008	4,707	833	17.7%
2009	10,637	1,392	<b>13.1%</b>

Age 18 Redeterminations			
FY	Total Reviews	Cessations After All Appeals	Percent
2005	55,331	18,636	33.7%
2006	40,640	14,890	36.6%
2007	71,359	26,508	37.1%
2008	69,430	24,091	34.7%
2009	100,986	29,504	<b>29.2%</b>

- Reduced calculations by the appropriate cessation rates for those sample cases where childhood CDRs or age 18 redeterminations were not completed.
- Projected sample results to each population.

We conducted our audit between April and May 2011 in Boston, Massachusetts. The entities audited were the Offices of Disability Programs under the Deputy Commissioner for Retirement and Disability Policy and Disability Determinations under the Deputy Commissioner for Operations. 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 objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>2</sup> The cessation rates after all appeals will likely increase in the future as appeals currently pending are completed.

## SAMPLE RESULTS AND PROJECTIONS

Table B-1: Childhood CDRs	
Population size	653,478
Sample size	275

Table B-2: Payments Issued Because SSA Did Not Complete Childhood CDRs Timely	
Sample results	\$583,661
Point estimate	\$1,386,944,460
Projection lower limit	\$1,271,943,867
Projection upper limit	\$1,501,945,052

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

Table B-3: Payments SSA Could Potentially Save by Completing All Childhood CDRs Timely	
Sample results	\$194,246
Point estimate	\$461,584,123
Projection lower limit	\$431,984,473
Projection upper limit	\$491,183,772

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

Table B-4: Childhood CDRs Not Completed Timely	
Sample cases	216
Point estimate	513,277
Projection lower limit	484,038
Projection upper limit	539,469

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

Table B-5: Age 18 Redeterminations	
Population size	52,073
Sample size	275

<b>Table B-6: Payments Issued Because SSA Did Not Complete Age 18 Redeterminations Timely</b>	
Sample results	\$30,059
Point estimate	\$5,691,874
Projection lower limit	\$3,518,909
Projection upper limit	\$7,864,839

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

<b>Table B-7: Payments SSA Could Potentially Save by Completing All Age 18 Redeterminations Timely</b>	
Sample results	\$33,168
Point estimate	\$6,280,643
Projection lower limit	\$3,689,376
Projection upper limit	\$8,871,909

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

<b>Table B-8: Age 18 Redeterminations Not Completed Timely</b>	
Sample cases	27
Point estimate	5,113
Projection lower limit	3,660
Projection upper limit	6,913

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

## Comparison of Sample Cases for Childhood Continuing Disability Reviews from Current Review to Prior Review

Table C-1 shows the results of the 275 childhood continuing disability review (CDR) cases analyzed in our current review as compared to the 275 childhood CDR cases analyzed for our prior review in 2006.<sup>1</sup>

<b>Table C-1: Childhood CDRs – All Sample Cases</b>				
Results of Childhood CDRs	Current 2011 Review	Percent	Dec. 2006 Review	Percent
CDRs not completed timely	216	78.5%	106	38.5%
CDRs not due at time of review	58	21.1%	44	16.0%
CDRs completed timely	1	0.4%	125	45.5%
<b>Total</b>	<b>275</b>	<b>100.0%</b>	<b>275</b>	<b>100.0%</b>

Table C-2 further breaks out the 216 and 106 childhood CDR cases SSA did not complete timely from our reviews. As shown below, the number of CDRs not initiated was 55 in the prior audit and 201 in the current audit—an increase of almost four times the amount. This difference in CDRs not initiated explains the substantial increase in our projection dollars as we calculated payments made to recipients for CDRs not completed. See Appendix B for our methodology.

<b>Table C-2: Childhood CDRs Not Timely</b>		
Results of Childhood CDRs	Current Review	Prior Review
CDRs not initiated	201	55
CDRs initiated but not completed at time of our review	7	7
CDRs completed more than a year after scheduled CDR date	8	44
<b>Total</b>	<b>216</b>	<b>106</b>

<sup>1</sup> SSA, Office of the Inspector General, *Childhood Continuing Disability Reviews and Age 18 Redeterminations (A-01-06-21093)*, December 2006.

## Agency Comments



## SOCIAL SECURITY

Date: September 14, 2011

Refer To: S1J-3

To: Patrick P. O'Carroll, Jr.  
Inspector General

From: Dean S. Landis /s/  
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Follow-up: Childhood Continuing Disability Reviews and Age 18 Redeterminations"(A-01-11-11118)—INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Frances Cord, at (410) 966-5787.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, “FOLLOW-UP: CHILDHOOD CONTINUING DISABILITY REVIEWS AND AGE 18 REDETERMINATIONS” (A-01-11-11118)**

**Recommendation**

Conduct childhood continuing disability reviews (CDRs) and age 18 redeterminations within the specific timeframes provided for in the Social Security Act.

**Response**

We agree. We will conduct childhood CDRs and age 18 redeterminations as our budget and our other priority workloads will allow.

## OIG Contacts and Staff Acknowledgments

### ***OIG Contacts***

Judith Oliveira, Director, Boston Audit Division

David Mazzola, Audit Manager

### ***Acknowledgments***

In addition to those named above:

Frank Salamone, Senior Auditor

Katie Greenwood, Senior Auditor

Kevin Joyce, IT Specialist

Michael Atherton, IT Specialist

For additional copies of this report, please visit our Website at [www.socialsecurity.gov/oig](http://www.socialsecurity.gov/oig) or contact the Office of the Inspector General's Public Affairs Staff Assistant at (410) 965-4518. Refer to Common Identification Number A-01-11-11118.

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The Office of the Inspector General (OIG) is comprised of an Office of Audit (OA), Office of Investigations (OI), Office of the Counsel to the Inspector General (OCIG), Office of External Relations (OER), and Office of Technology and Resource Management (OTRM). To ensure compliance with policies and procedures, internal controls, and professional standards, the OIG also has a comprehensive Professional Responsibility and Quality Assurance program.

### **Office of Audit**

OA conducts financial and performance audits of the Social Security Administration's (SSA) programs and operations and makes recommendations to ensure program objectives are achieved effectively and efficiently. Financial audits assess whether SSA's financial statements fairly present SSA's financial position, results of operations, and cash flow. Performance audits review the economy, efficiency, and effectiveness of SSA's programs and operations. OA also conducts short-term management reviews and program evaluations on issues of concern to SSA, Congress, and the general public.

### **Office of Investigations**

OI conducts investigations related to fraud, waste, abuse, and mismanagement in SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, third parties, or SSA employees performing their official duties. This office serves as liaison to the Department of Justice on all matters relating to the investigation of SSA programs and personnel. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

### **Office of the Counsel to the Inspector General**

OCIG provides independent legal advice and counsel to the IG on various matters, including statutes, regulations, legislation, and policy directives. OCIG also advises the IG on investigative procedures and techniques, as well as on legal implications and conclusions to be drawn from audit and investigative material. Also, OCIG administers the Civil Monetary Penalty program.

### **Office of External Relations**

OER manages OIG's external and public affairs programs, and serves as the principal advisor on news releases and in providing information to the various news reporting services. OER develops OIG's media and public information policies, directs OIG's external and public affairs programs, and serves as the primary contact for those seeking information about OIG. OER prepares OIG publications, speeches, and presentations to internal and external organizations, and responds to Congressional correspondence.

### **Office of Technology and Resource Management**

OTRM supports OIG by providing information management and systems security. OTRM also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, OTRM is the focal point for OIG's strategic planning function, and the development and monitoring of performance measures. In addition, OTRM receives and assigns for action allegations of criminal and administrative violations of Social Security laws, identifies fugitives receiving benefit payments from SSA, and provides technological assistance to investigations.