



Office *of the* Inspector General
SOCIAL SECURITY ADMINISTRATION

Congressional Response Report

Field Office Closures in the
Philadelphia Region

A-03-18-50720 | September 2018

OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

September 27, 2018

The Honorable Donald S. Beyer, Jr.
Member, United States House
of Representatives
1119 Longworth House Office Building
Washington, DC 20515

Dear Mr. Beyer:

In a May 1, 2018 letter, you asked that we review the circumstances and procedures the Social Security Administration (SSA) used in deciding to close the Arlington, Virginia, field office. Based on your request, we evaluated SSA's (1) reasons for the field office closures, (2) plans to mitigate any effects on individuals served by the field offices, and (3) adherence to its internal policies related to congressional and public notification of the office closures. After we received your letter, Representative Elijah Cummings' office contacted us regarding closure of an SSA office in Baltimore North, Maryland. Since both the Arlington and Baltimore North offices are under SSA's Philadelphia Regional Office, we also reviewed Baltimore North's closure and will share a copy of this report with Representative Cummings.

My office is committed to combating fraud, waste, and abuse in SSA's operations and programs. Thank you for bringing your concerns to my attention. The report highlights various facts pertaining to the issues raised in your letter. To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

If you have any questions concerning this matter, please call me or have your staff contact Walter Bayer, Congressional and Intragovernmental Liaison, at (202) 358-6319.

Sincerely,



Gale Stallworth Stone
Acting Inspector General

Enclosure

cc:
Commissioner of Social Security

Field Office Closures in the Philadelphia Region

A-03-18-50720



September 2018

Office of Audit Report Summary

Objective

To address concerns from Representatives Donald S. Beyer, Jr., and Elijah E. Cummings regarding the closing of Social Security Administration (SSA) field offices in Arlington, Virginia, and Baltimore North, Maryland. We evaluated SSA's (1) reasons for the field office closures, (2) plans to mitigate any effects on individuals currently served by the field offices, and (3) adherence to its internal policies related to congressional and public notification of the office closures.

Background

Periodically, SSA reviews its field offices to ensure service delivery is consistent with the needs of the area. Policy requires that SSA notify Congress and other stakeholders about significant service delivery changes after the change is approved by the Deputy Commissioner for Operations. The policy states that the SSA regional office should discuss significant service delivery changes with affected Senators and Representatives or a staff member representing that individual. The policy instructs SSA to hold discussions with all other parties who may have a stake in the proposed changes, such as community leaders.

Conclusions

In June 2018, SSA closed the Arlington, Virginia, and Baltimore North, Maryland, field offices because the leases had expired, the lessors would not renew the leases, and the General Services Administration (GSA) could not locate suitable replacement space. As a result, the Regional Commissioner proposed to close both field offices and consolidate its employees with neighboring offices that support the existing service areas.

The proximity of field offices near the Arlington and Baltimore North field offices should help mitigate any of the closure's negative effects. Within a 17-mile radius of both field offices, there are five field offices near the now closed Arlington field office and seven near the now closed Baltimore North field office. The nearby locations will provide designated areas to service customers, a larger staff, and continued accessibility to public transportation for customers.

SSA's policy requires that the Regional Commissioner notify congressional and other stakeholders of the Arlington and Baltimore North field offices' closure. However, the policy does not contain specific timeframes for the notifications. However, SSA does provide guidance to its regional offices on the suggested timeframes for these notifications. The SSA guidance states that notifications must be made at least 90 days before the date of the consolidation except in extenuating circumstances, such as critical health, safety, space, and renovation issues. SSA first notified the affected congressional officials of the Arlington field office closure on March 6, 2018—about 107 days before the closure and Baltimore North field office closure on March 6 and 7, 2018—about 107 or 108 days before the closure. SSA also notified various stakeholders for both field offices, such as local community leaders, between 30 and 106 days before the closure.

In response to our draft report, SSA stated it continues to evaluate its field office consolidation policy and will make updates, where necessary, to ensure consistent regional business processes.

TABLE OF CONTENTS

Objective	1
Background	1
Arlington, Virginia, Field Office	2
Baltimore North, Maryland, Field Office	2
Results of Review	2
Reasons for the Field Office Closures	3
Arlington, Virginia, Field Office Closure	3
Baltimore North, Maryland, Field Office Closure	3
Plans to Mitigate Any Effects on Individuals Served	4
Internal Policies Related to Congressional and Public Notification	5
Conclusions	6
Agency Comments	6
Appendix A – Congressional Request Letter	A-1
Appendix B – Scope and Methodology	B-1
Appendix C – Agency Comments	C-1

ABBREVIATIONS

AIMS	Administrative Instructions Manual System
FY	Fiscal Year
GAM	General Administration Manual
GSA	General Services Administration
OIG	Office of the Inspector General
Pub. L. No.	Public Law Number
SAR	Service Area Review
SSA	Social Security Administration

OBJECTIVE

Our objective was to address concerns from Representatives Donald S. Beyer, Jr., and Elijah E. Cummings regarding the closing of Social Security Administration (SSA) field offices in Arlington, Virginia, and Baltimore North, Maryland.¹ We evaluated SSA's (1) reasons for the field office closures, (2) plans to mitigate any effects on individuals served by the field offices, and (3) adherence to its internal policies related to congressional and public notification of the office closures.

BACKGROUND

SSA's Administrative Instructions Manual System (AIMS) outlines its policy for assessing field offices for consolidation or closure.² Each year, Area Directors review the field offices for which they are responsible. The annual review compiles such information as whether an office is leased or owned, average number of monthly visitors, and number of field office employees. If the Area Director determines additional analysis is necessary to determine whether a change is needed, he/she may conduct a Service Area Review (SAR).³ A SAR is a complete office assessment that includes a review of the office's demographic and workload factors, accessibility, and other unique or special needs.⁴ SARs help SSA determine whether it should upgrade, downgrade, consolidate, or realign field offices into or out of an existing area or make no change.⁵

After the Deputy Commissioner for Operations approves a field office change, AIMS requires that the Regional Commissioner notify congressional and other stakeholders (community leaders, advocacy groups, etc.) about any significant service delivery change, such as a field office closing. Specifically, the Regional Commissioner is required to make telephone contact with congressional members or their staffs as well as written notification (most preferably by email). The policy also instructs Regional Commissioners to hold discussions with all other parties who may have a stake in the proposed changes.⁶ However, AIMS does not define timeframes for the congressional or other stakeholder notification. The Agency does provide guidance⁷ that notifications (congressional, union, staff, and local stakeholders) must be made at least 90 days before the date of the consolidation except in extenuating circumstances. SSA

¹ In May 2018, Representative Cummings requested the OIG conduct a review regarding the closure of the Baltimore North, Maryland, field office; however, this request was not in an official letter.

² SSA, AIMS, *General Administration Manual* (GAM), ch. 12.05, sec. 12.05.11 (January 12, 2017).

³ SSA, AIMS, GAM, ch. 12.05, sec.12.05.03.B (January 12, 2017).

⁴ SSA, AIMS, GAM, ch. 12.05, secs.12.05.04, 12.05.06, and 12.05.09 (January 12, 2017). See Appendix B for the elements that should be included in each SAR.

⁵ SSA, AIMS, GAM, ch. 12.05, secs.12.05.03, 12.05.04, and 12.05 .06 (January 12, 2017).

⁶ SSA, AIMS, GAM, ch. 12.05, sec.12.05.11.A and B (January 12, 2017).

⁷ SSA, *Operations Service Delivery Change Request Business Process*, provides guidance to regions for service delivery changes.

indicated the exception allows for certain circumstances that require greater flexibility and caution, such as those involving critical health, safety, space, and renovation issues.

Arlington, Virginia, Field Office

The Arlington, Virginia, field office was located at 1401 Wilson Boulevard, Suite 200, Arlington, Virginia, 22209. In November 2017, the field office employed 1 manager and 10 staff members who served Arlington County and the nearby Washington, DC, area. According to the 2017 Census, approximately 237,000 individuals were residing in Arlington, Virginia. About 27,000 residents were receiving Social Security benefits. In Fiscal Year 2017, the field office serviced, on average, approximately 96 visitors a day. About 49 percent of the office's workload related to visitors obtaining new or replacement Social Security number cards.

Baltimore North, Maryland, Field Office

The North Baltimore, Maryland, field office, also known as Baltimore North, was located in Suite 428, Rotunda Mall, 711 West 40th Street, Baltimore, Maryland, 21211. As of February 2017, the field office was in a temporary space that was smaller than the previous Baltimore North office because the Baltimore North office's lessor did not want to renew the lease and the General Services Administration (GSA) could not locate suitable space. As a result, in February 2017, while nine employees were officially assigned to the North office, only four employees worked in the redesigned office space daily. According to the 2014 Census, about 68,000 people were residing in Baltimore North. As of 2011, approximately 15,000 residents were receiving benefits from SSA. On average, the field office served 50 visitors a day, with about 50 percent being served via telephone, mail, fax, or the Internet.

RESULTS OF REVIEW

As of June 2018, SSA had closed the Arlington and Baltimore North field offices because their leases had expired, the building owners would not renew the leases, and GSA could not locate suitable replacement space. While GSA searched for suitable replacement space for several years for both locations, it was not able to locate viable space that met SSA requirements. As a result, the Regional Commissioner proposed to close both field offices and consolidate its employees into neighboring field offices in the existing service areas.

SSA policy requires that the Regional Commissioner notify congressional and other stakeholders of the Arlington and Baltimore North field offices' closure.⁸ However, the policy does not contain specific timeframes for the notifications. SSA first notified the affected congressional officials of the Arlington field office closure on March 6, 2018—about 107 days before the closure—and the Baltimore North field office closure on March 6 and 7, 2018—about 107 and 108 days before the closure, respectively. SSA also notified various stakeholders for both field offices, such as local community leaders, between 30 and 106 days before the closure.

⁸ SSA, AIMS, GAM, ch. 12.05, sec.12.05.11.A (January 12, 2017).

Reasons for the Field Office Closures

In June 2018, the Arlington and Baltimore North field offices were closed because their leases expired, the lessor would not renew the leases, and GSA could not locate suitable replacement space. The lessors were not willing to expand the leases past the lease period because both field office locations had been approved for redevelopment or repurposing. Further, while GSA searched for suitable replacement space for several years for both locations, it could not locate viable space that met SSA's requirements. As a result, the Regional Commissioner proposed to close both field offices and relocate the workload and employees to neighboring offices in the existing service areas.

Arlington, Virginia, Field Office Closure

In August 2004, SSA entered into a 10-year lease agreement for the Arlington field office space. Before the lease expired, the Agency entered into three lease extensions making the final expiration term September 2018. However, in June 2014, the lessor obtained approval to redevelop the building site. The lessor's plan was to turn the site into a residential and commercial property. Therefore, the lessor informed SSA it would no longer renew the lease. SSA contacted GSA to search for a new location for the Arlington field office. GSA conducted three market surveys and advertised on seven occasions for space from July 2016 to September 2017 as well as attempted to modify the lease's terms (expanded the delineated area and relaxed several technical requirements) to secure a viable alternative location. Unfortunately, none of the changes yielded market interest, and, in November 2017, GSA informed SSA it could not secure a viable location that would meet SSA's space requirements. As a result, in December 2017, the Regional Commissioner recommended to close the Arlington field office and consolidate its employees with neighboring Virginia-area field offices. On June 21, 2018, the office officially closed.

Baltimore North, Maryland, Field Office Closure

SSA entered into a 10-year lease agreement in 2004 for the Baltimore North field office space. However, in February 2013, a developer was granted approval to redevelop the area where the field office was located. As a result, GSA began searching for a new location for the Baltimore North field office. After several market surveys and GSA's inability to locate suitable space, SSA entered into a 2-year lease at a nearby site in February 2017 (due to expire in February 2019) while GSA continued searching for a permanent location. However, the new temporary space did not have a waiting room for customers and was significantly smaller. As a result, only four of the nine employees who were officially assigned to the Baltimore North office could work in the redesigned office space daily.⁹ This caused customers to form lines outside the office (in communal areas within the building) while they waited for service, which led to repeated complaints from other tenants in the building as well as the lessor. In July 2017,

⁹ This new space was only 900 square feet, less than one-quarter of the prior office space. As a result, there was only room for four employees; the other five employees were deployed to nearby offices in the metropolitan Baltimore area.

SSA received a letter from GSA noting that the lessor was not interested in maintaining SSA as a long-term tenant and would not provide additional lease extensions. Further, the letter stated there was no path to procuring new leased space within the delineated area, and SSA should start arranging to relocate its employees to other nearby locations as they needed to vacate the space no later than February 15, 2019. As a result, in November 2017, the Regional Commissioner recommended closing the Baltimore North field office and transferred the remaining four employees to other nearby field offices. The SAR and Service Delivery Assessment for Baltimore North assisted the Agency with determining where and how to realign workloads and employees. On June 22, 2018, the office officially closed.

Plans to Mitigate Any Effects on Individuals Served

To mitigate the effects of closing its Arlington and Baltimore North field offices, SSA consolidated its employees and workloads into existing field offices in the nearby areas. This lessened the disruption to customers as the other locations provided suitable space with designated areas to service customers, a larger staff, and continued accessibility to public transportation.

There are five other field offices within a 17-mile radius of the Arlington field office that are accessible by public transportation. For instance, the Washington, DC, Downtown office (formerly M. St.) is 4 miles away and accessible via public transportation. In addition, the Alexandria and Fairfax field offices are between 10 and 17 miles away and accessible via public transportation and a major interstate highway. These offices also supply free parking. Additionally, the Agency noted that the DC metro area constituents (including those in the Arlington area) heavily used online services. For example, for the quarter ended September 2017, about 62 percent of retirement and 47 percent of disability claims received were filed online via the Internet for the Arlington field office. Therefore, a majority of their Social Security transactions could be handled online or via self-help computer stations in the local offices.¹⁰

There are seven other field offices within a 10-mile radius of the closed Baltimore North field office and accessible by public transportation that can continue servicing customers who require face-to-face service. For example, the Baltimore Northeast office is approximately 4 miles away, and Baltimore Wabash is about 6 miles away. For customers who do not require face-to-face service, SSA informed us that most of their business may be conducted online or via the National 800-Number. Further, customers will have a reception area and will no longer have to wait in hallways for face-to-face contact.

¹⁰ Self-help personal computers are available in over 800 offices nationwide. These computers allow individuals to access SSA's online services using computers in field offices, enabling them to complete some transactions without waiting to see an SSA representative.

Internal Policies Related to Congressional and Public Notification

SSA policy requires that the SSA Regional Office hold discussions about any significant service delivery changes with affected Senators and Representatives as well as their respective staff members after the Deputy Commissioner for Operations approves a closure.¹¹ Furthermore, according to policy, SSA should hold discussions with all other parties who may have a stake in the proposed changes, such as community leaders.¹² However, the policy does not contain specific timeframes for the notifications. In our May 2015 report, *The Social Security Administration's Field Office Consolidation Decision Process*,¹³ SSA stated it would notify stakeholders and community leaders at least 180 days before the proposed consolidation date and allow a 30-day comment period for feedback before consolidating a field office based on an investigation by the Senate Special Committee on Aging.¹⁴ The 180-day recommendation accompanied the *2015 Appropriations Act*,¹⁵ but Congress did not extend the notification guidelines or recommendations in the *2016 to 2018 Appropriation Acts*. Therefore, SSA did not include the 180-day notification requirement in its policy.

However, SSA's *Operations Service Delivery Change Request Business Process* states notifications (congressional, union, staff, and local stakeholders) must be made at least 90 days before the date of a consolidation except in extenuating circumstances.¹⁶ SSA indicated the exception allows for certain circumstances that require greater flexibility and caution, such as those involving critical health, safety, space, and renovation issues. Because both building owners declined to renew leases for the offices, they met the criteria for an extenuating circumstance for congressional notification. Additionally, the notification timeframes are at the discretion of the Regional Commissioner who has oversight of the field office.

SSA verbally informed the affected congressional officials of the Arlington field office closure on March 6, 2018, 107 days before the closure. SSA also notified in writing various stakeholders, such as local community leaders and the public, between March 8 and May 7, 2018, which was between 45 and 105 days before the closure. The Agency contacted 44 individuals and organizations, such as the Arlington Aging and Disability Services, Arlington County Government, and Navy Mutual Association, to notify them of the office closure. In addition to verbal notification, the Agency provided written notification of the closure to

¹¹ SSA, *AIMS*, GAM, ch. 12.05, sec. 12.05.11.A (January 12, 2017).

¹² SSA, *AIMS*, GAM, ch. 12.05, sec.12.05.11.A (January 12, 2017).

¹³ SSA, OIG, *The Social Security Administration's Field Office Consolidation Decision Process*, A-07-15-25027, (May 2015).

¹⁴ Senate Special Committee on Aging, *Reduction in Face-to-Face Services at the Social Security Administration*, p. 16.

¹⁵ Fiscal Year 2015 explanatory statement, 151 Cong. Rec. H9842 {December 11, 2014} associated with the Consolidated and Further Continuing Appropriations Act of 2015, Pub. L. No. 113-235, 128 Stat. 2130.

¹⁶ SSA, *Operations Service Delivery Change Request Business Process*.

congressional officials between March 12 and May 22, 2018, 30 to 101 days before the office closure.

SSA verbally informed the affected congressional officials of the Baltimore North field office closure on March 6 and 7, 2018, 107 and 108 days before the closure. The Agency also notified the congressional officials via email on March 9, 2018 and via mail on May 22, 2018. SSA notified various other stakeholders, such as local community leaders and the public, between March 8 and May 21, 2018, which was between 30 and 106 days before the closure. According to SSA, it contacted 23 individuals and organizations to notify them of the office closure.

We also conducted a review of a field office closing in Milwaukee, Wisconsin, at the request of Representative Gwen Moore. In response to our July 2018 report, *Milwaukee Social Security Administration Field Office Closure*,¹⁷ SSA stated it was reviewing its field office consolidation policy and regional business processes to ensure consistency and identify areas for improvement. Additionally, in the future, if GSA needs to expand its search area for a given relocation, SSA stated it will inform the local congressional delegation when it encounters difficulties finding space for office relocations.

CONCLUSIONS

Expiring leases, lessors not renewing the leases, and GSA's inability to locate suitable replacement space led to SSA's decisions to close the Arlington and Baltimore North field offices. Following extensive searches, GSA could not secure space in either service area. As a result, the Regional Commissioner recommended closing the Arlington and Baltimore North field offices and consolidating their employees into surrounding field offices. According to SSA, the surrounding field offices provide suitable space with designated areas to service customers, a larger staff, and access to public transportation.

AGENCY COMMENTS

In response to our draft report, SSA stated it continues to evaluate its field office consolidation policy and will make updates, where necessary, to ensure consistent regional business processes, see Appendix C.



Rona Lawson
Assistant Inspector General for Audit

¹⁷ SSA, OIG, *Milwaukee Social Security Administration Field Office Closure*, A-05-18-50671, (July 2018).

APPENDICES

Appendix A – CONGRESSIONAL REQUEST LETTER

DONALD S. BEYER, JR.
8TH DISTRICT, VIRGINIA

VICE RANKING MEMBER
COMMITTEE ON
SCIENCE, SPACE, AND TECHNOLOGY
COMMITTEE ON NATURAL RESOURCES
JOINT ECONOMIC COMMITTEE

Congress of the United States
House of Representatives
Washington, DC 20515-4608
May 1, 2018

WASHINGTON OFFICE:
1119 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-4376

DISTRICT OFFICE:
5285 SHAWNEE ROAD
SUITE 250
ALEXANDRIA, VA 22312

Gale Stallworth Stone
Acting Inspector General
Social Security Administration (SSA)
300 Altmeyer Building
6401 Security Blvd.
Woodlawn, MD 21235

Dear Acting Inspector General Stone:

H.R. 1625, the Fiscal Year 2018 Consolidated Appropriations Act, contained language noting that your office is reviewing decisions to close field offices, including whether SSA has followed internal procedures in proposing consolidation, notifying the public and considering feedback from public input. The language specifically states that while the Inspector General review is ongoing, the Acting Commissioner should not make any final decisions related to field office locations under review.

I raise this with respect to the proposed closure of the only SSA field office in Arlington, Virginia. The reason stated for the closure is the inability to find suitable space. Given the vacancy rate within Arlington County and the likely continued availability of the existing space, office space availability is not an issue. Indeed, Arlington County has made an overture to assist with finding a suitable space so that the field office can stay within the County.

Closure of the field office will force my constituents to suffer from the lack of in-person services, especially to a metro accessible office. That is no small matter when many elderly and disabled Arlingtonians who may lack access to a car or internet access depend upon this field office. In addition, I am concerned that there has been no public notice and no public input in this decision. I ask that you consider these factors in your review of this proposal.

I ask that you provide me with a full accounting of whether federal law, regulations and SSA procedures have been followed in the case of this proposed consolidation, including notification to the public and consideration of feedback from public input. Please provide this accounting in a timely manner as the office is proposed for closure on June 21st and I need to ensure my constituents maintain services.

I look forward to your review of this and other office closure decisions and your recommendations for further action that best serves my constituents and the American public.

Sincerely,


Donald S. Beyer Jr.

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Appendix B – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed the applicable section of the Administrative Instructions Manual System related to the field office consolidation process.
- Reviewed prior Office of the Inspector General and Government Accountability Office reports related to customer service delivery planning and consolidation of physical infrastructure.
- Reviewed applicable sections of the following appropriations acts and applicable sections of associated explanatory statements:
 - *Consolidated Appropriations Act of 2014*, Pub. L. No. 113-76, 128 Stat. 5, p. 406;
 - *Consolidated and Further Continuing Appropriations Act of 2015*, Pub. L. No. 113-235, 128 Stat. 2130, p. 2511;
 - *Consolidated Appropriations Act of 2016*, Pub. L. No. 114-113, 129 Stat. 2242, p. 2645;
 - *Consolidated Appropriations Act of 2017*, Pub. L. No. 115-31, 131 Stat. 135, p. 559; and
 - *Consolidated Appropriations Act of 2018*, Pub. L. No. 115-141, 132 Stat. 348.
- Reviewed and obtained information from the Philadelphia Social Security Administration's (SSA) Regional Commissioner's Office related to the Arlington, Virginia, and Baltimore North, Maryland, Field Office closures.
- Interviewed congressional staff from the office of Representative Donald Beyer, Jr.
- Obtained and reviewed correspondence sent to congressional staff.
- Interviewed General Services Administration officials regarding the closure of the Arlington, Virginia, and Baltimore North, Maryland, field offices.
- Obtained and reviewed information and correspondence regarding efforts to find suitable space.

We conducted our review between April and August 2018 in Philadelphia, Pennsylvania. The principal entity reviewed was SSA's Philadelphia Regional Commissioner's Office. We conducted this 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 findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: September 25, 2018 Refer To: SIJ-3

To: Rona Lawson
Assistant Inspector General for Audit

Stephanie Hall

From: Stephanie Hall
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Congressional Response Report, "Field Office Closures in the Philadelphia Region" (A-03-18-50720) -- INFORMATION

Thank you for the opportunity to review the draft report. As indicated in the report, we made the decisions to close the Arlington, Virginia and Baltimore North field offices due to the inability to renew expired leases and locate suitable replacement space. We continue to evaluate our field office consolidation policy and will make updates, where necessary, to ensure consistent regional business processes.

Please let me know if we can be of further assistance. You may direct staff inquiries to

Trae Sommer at (410) 965-9102.

MISSION

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Baltimore, Maryland 21235

FAX: 410-597-0118

Telephone: 1-800-269-0271 from 10:00 a.m. to 4:00 p.m. Eastern Standard Time

TTY: 1-866-501-2101 for the deaf or hard of hearing