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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**AUDIT OF THE  
WILKES-BARRE  
FOLDER SERVICING OPERATION**

September 2003

A-04-03-13040

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**AUDIT REPORT**

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# SOCIAL SECURITY

## MEMORANDUM

**Date:** September 23, 2003

**To:** The Commissioner

**From:** Inspector General

**Subject:** Audit of the Wilkes-Barre Folder Servicing Operation (A-04-03-13040)

## **OBJECTIVE**

Our objective was to determine the accuracy and condition of the physical and computerized folder inventory at the Wilkes-Barre Folder Servicing Operation (WBFSO).

## **BACKGROUND**

The Social Security Administration (SSA) stores all Title XVI folders at WBFSO, about 4.6 million folders. SSA hired a contractor to file, retrieve, and maintain case folders at WBFSO and update the electronic inventory systems. From September 2000 through February 2003, SSA paid the WBFSO contractor over \$5.5 million for these services. Additionally, SSA paid the contractor over \$1.3 million to perform the Master File Validation (MFV)<sup>1</sup> project from March 2001 to April 2002.

SSA and Disability Determination Services' staff routinely request Title XVI case folders from WBFSO to facilitate claims decisions. WBFSO personnel document the movement of folders in and out of the facility by recording the action in the Folder Control System (FCS). The FCS interfaces with SSA's Supplemental Security Income Control System (SSICS), and actions recorded in FCS are uploaded to SSICS each night. SSICS tracks Title XVI folder movement nationally and is the mechanism for SSA components to request folders.

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<sup>1</sup> MFV was a one-time project where the contractor traced folders listed in SSICS to its physical location. Inventory errors identified during the MFV were to be corrected by the contractor. We did not review the corrective actions taken by the contractor on the results of the MFV.

## **SCOPE AND METHODOLOGY**

Our audit assessed the accuracy, reliability and physical condition of the case folder inventories maintained at WBFSO. In conducting our audit we:

- Interviewed SSA and WBFSO contractor personnel to obtain an understanding of WBFSO operations.
- Evaluated the existing controls, policies, and procedures related to folder processing at WBFSO.
- Performed tests of the electronic and physical inventories. See Appendix A for a detailed description of our inventory tests.
- Evaluated the overall physical condition of 300 case folders to determine whether folders were torn or mutilated, properly labeled, filed in sequence, or had loose contents.
- Estimated the results of our electronic and physical inventory tests to the population of Title XVI case folders. See Appendix A for a detailed description of our sampling methodology.

Generally, we determined the computer-generated data used for our audit were sufficiently reliable to meet our audit objectives. This assessment was based on tests we performed on the completeness, accuracy, and validity of the FCS and SSICS inventory systems. The issues we identified with the completeness and accuracy of the data discussed in the results of review section of this report. The entity audited was the Center for Material Resources and Support within the Office of Central Operations. We performed our audit in Wilkes-Barre, Pennsylvania, and Atlanta, Georgia, from November 2002 to February 2003. We conducted our audit in accordance with generally accepted government auditing standards.

## **RESULTS OF REVIEW**

Our audit identified folders that were missing from WBFSO, and folders that either were not recorded or improperly recorded in the SSICS electronic inventory systems. Based on the errors identified, we estimate that, of the 4.6 million folders at WBFSO, approximately

- 77,000 folders recorded in SSICS as stored at WBFSO would not be found at the facility and
- 108,000 folders were not properly recorded in SSICS as stored at WBFSO, when in fact the folders were located at WBFSO.

In addition to the inventory accountability errors, we estimate that approximately 92,000 folders were stored at WBFSO that should have been destroyed. The additional storage cost for these folders is estimated at about \$13,400, annually. We also estimate that over 1.6 million folders had loose (unsecured) contents. Unsecured documents within a folder are susceptible to being misfiled or lost.

Finally, we found that individual post-entitlement (PE) documents,<sup>2</sup> received daily from SSA components, were not initially filed with the recipient's case folder already stored at WBFSO. In fact, PE documents were sorted, inventoried, packaged, and then shipped to the Federal Records Center (FRC) in Philadelphia, Pennsylvania, for storage. We believe this process is inefficient because it results in unnecessary storage and shipping costs and delays the delivery of case folders to the requester.

### **FOLDERS COULD NOT BE LOCATED WITHIN WBFSO**

Our test of the electronic inventory identified 5 of 300 folders we selected from the SSICS inventory could not be located at WBFSO. For the five folders, SSICS reported the following information.

- Four folders were sent to WBFSO from SSA components.<sup>3</sup> SSICS reported that three folders were sent to WBFSO on or before August 17, 2000, and the fourth was sent on November 18, 2002. Based on these sent dates, WBFSO should have received the folders before our audit period.<sup>4</sup>
- WBFSO received one folder in January 1976. Although SSICS reported that WBFSO had received this folder, the folder could not be located.

We could not determine whether WBFSO received the folders because SSA did not track folders through the shipping process. Since most folders are shipped via the U.S. Postal Service, without shipment tracking records, we could not determine the folders' final location. We estimate that approximately 77,000 of the 4.6 million folders would not be found at WBFSO. When folders cannot be located, claims decisions may be delayed, and SSA could have to expend scarce resources to locate or reconstruct folders.

We believe SSA should consider the use of a shipping service that tracks folders from the point of origin to the destination, such as Federal Express, United Parcel Service, or the U.S. Postal Services' Express Mail. A shipping services tracking system would

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<sup>2</sup> PE documents include all documents received after an initial claims decision that may affect a benefit payment. Examples of PE documents include records of changes of address or income and resources.

<sup>3</sup> When an SSA component updates SSICS to show a folder has been sent to WBFSO, the folder's location becomes WBFSO with a "cleared" status while the folder is in transit.

<sup>4</sup> As of July 7, 2003, SSICS reported that two of the four folders had not been received by the WBFSO and the remaining two folders had become eligible for destruction.

allow the Agency to monitor the location of case folders and make the WBFSO contractor more accountable for folders that are not properly updated in the inventory systems upon receipt at WBFSO. Also, opening the folder shipment workload to the commercial marketplace for competition is in accordance with the President's Management Agenda, which encourages the use of competitive sourcing.<sup>5</sup>

### **FOLDERS WERE NOT PROPERLY RECORDED IN THE ELECTRONIC INVENTORY SYSTEM**

To test the physical inventory, we selected 300 folders physically located at WBFSO and determined whether the case folder was properly recorded in both the FCS and SSICS inventory. We identified folders that were stored at WBFSO, but SSICS did not report the folders as part of the WBFSO folder inventory. We also found folders at WBFSO that were recorded in SSICS as destroyed but, these folders were still stored at the facility.

- Seven folders were found at WBFSO, but were recorded in SSICS as stored at a location other than WBFSO, lost, or inactive. Projecting this error, we estimate that approximately 108,000 folders were located at WBFSO but were not recorded in SSICS as being stored at WBFSO.
  - Three folders were recorded in SSICS as located somewhere other than WBFSO. As a result, requests from an SSA component would be directed to the records storage facility or field office identified in SSICS as housing the record, instead of WBFSO. Therefore, the initial request would be unsuccessful, and other actions would have to be initiated to locate the folder. This would delay the folder retrieval process or possibly result in a folder not being located.
  - Three folders were recorded in SSICS as lost. These folders would not be delivered to an SSA user unless the user knew that Title XVI folders were stored at WBFSO and a request to the facility might result in a folder being located and delivered.
  - One folder was recorded in SSICS as inactive. Folders stored at WBFSO that have had little movement, but do not qualify for destruction, are coded inactive and should be transferred to an FRC for storage. Similar to folders stored at another location, a request for this folder would be misdirected and delay the folders delivery.
- Six folders were recorded in SSICS as destroyed. Although SSICS indicated that the folders should have been destroyed between 1993 and 2002, the folders were still being stored at WBFSO. The WBFSO contractor did not identify and destroy

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<sup>5</sup> The President's Management Agenda, Fiscal Year 2002, Executive Office of the President, Office of Management and Budget, at 17-18.

folders that were scheduled for destruction. We estimate that approximately 92,000 folders were stored at WBFSO that should have been destroyed. SSA estimated the storage cost for the 92,000 folders was about \$13,400, annually.

## **FOLDERS HAD LOOSE CONTENTS**

Our tests of the 300 folders selected from the physical inventory identified 106 folders with loose contents. When the contents of folders are not properly secured, documents could be separated from the folder and misfiled or lost. According to SSA personnel, the WBFSO folders have loose contents because

- SSA components send folders to WBFSO without properly securing documents in the folder and
- SSA personnel loosely filed PE material in the case folders before the contractor's current responsibility related to PE documents.<sup>6</sup>

SSA personnel stated that the contractor was not required to secure loose documents inside a folder. In fact, SSA explained that this practice would be time-consuming, would increase the cost of the contract, and could result in material being misfiled within the folder. At the time of our audit, SSA required that the contractor secure folders with loose contents by rubber banding the outside of the folder before shipment.

SSA personnel stated that the SSA components shipping records to the WBFSO are responsible for securing documents inside the folder. However, SSA could not provide us with a policy that clearly defined who was responsible for securing documents in a folder prior to shipping. In fact, we found that SSA's policies and procedures do not adequately address the responsibilities and procedures for securing a folder's contents prior to shipping. We believe SSA needs to establish procedures to safeguard the contents of case folders prior to folder shipment.

Projecting this error to the universe of 4.6 million folders stored at the WBFSO, we estimate over 1.6 million folders have loose contents.

## **POST-ENTITLEMENT DOCUMENTS WERE NOT INITIALLY FILED WITH THE FOLDER**

PE documents received daily from SSA were not filed with the recipient's case folder already stored at WBFSO. In fact, upon receipt at WBFSO, PE documents were sorted, inventoried, packaged, and shipped to the FRC for storage. Over time, multiple PE documents for individuals are sent to the FRC and stored in separate folders. When an SSA component requests a folder, WBFSO requests PE documents from the FRC. Upon receipt from FRC, WBFSO files PE documents with the folder, which is then sent

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<sup>6</sup> For a description of the contractor's responsibility related to PE documents, see the section of this report titled "PE Documents Were Not Initially Filed With The Folder."

to the requestor. The process of retrieving and matching PE documents with a case folder takes approximately 30 to 45 days.

The process of storing PE documents at the FRC began in 1995. At that time, other tenants occupied the same building as WBFSO, and additional space was not available to store PE documents. However, at the time of our audit, these tenants were no longer located in the building, and SSA officials stated that space was available to store PE documents.

We believe PE storage procedures were inefficient, costly, and delayed the delivery of case folders to the requestor. At the time of our audit, SSA's PE documents occupied 127,862 cubic feet of space at the Philadelphia FRC at a cost of \$2.10 per cubic foot per year. In Fiscal Year (FY) 2002, the WBFSO requested 705,088 PE folders from the FRC and was charged \$1.05 per PE folder retrieval. Accordingly, SSA spent over \$1 million to retrieve, store, and ship PE documents in FY 2002 (see Table 1).

**Table 1: Summary of PE Costs**

<b>Service</b>	<b>Cost (Actual)</b>
FRC Retrieval Fees	\$740,342
FRC Storage Fees	268,510
Shipping to/from FRC	44,250
Totals	\$1,053,102

## **CONCLUSIONS AND RECOMMENDATIONS**

As a result of the inventory problems, Title XVI disability folders may not be readily available to SSA components to facilitate claims actions. The untimely retrieval of a case folder delays claim actions, and lost folders require that SSA expend scarce resources to locate or reconstruct folders. In the end, SSA's customers are inconvenienced or left skeptical about the Agency's ability to safeguard important documents. The records maintained at WBFSO are essential for SSA to make sound decisions regarding beneficiary entitlements and to deliver world-class service.

Therefore, we recommend that SSA:

1. Determine the location of the five missing folders. If the folders cannot be located, determine the necessary corrective action that should be taken on these folders.
2. Perform a cost-benefit analysis on using a shipping service that tracks folders from the point of origin to the destination.
3. Adjust SSICS to indicate that the seven folders recorded as stored at a location other than WBFSO, lost, or inactive are at WBFSO.



4. Destroy the six folders identified with expired destruction dates and remind the WBFSO contractor to follow the folder destruction schedule.
5. Establish procedures to safeguard the contents of case folders during the shipping process.
6. Determine whether filing PE documents at WBFSO would be cost beneficial and more efficient than the current practice of storing PE documents at the FRC.

### **AGENCY COMMENTS**

In response to our draft report, SSA agreed with Recommendations 1, 3, 4 and 6. With regards to Recommendation 2, SSA stated that the USPS has been a reliable shipper and the annual tracking of over two million folders would be a monumental task that would outweigh the benefit derived. In response to Recommendation 5, SSA stated that it currently takes appropriate measures to secure case folders by placing them in heavy-duty envelopes and sealed boxes during the shipping process. The full text of SSA's comments is included in Appendix B.

### **OFFICE OF THE INSPECTOR GENERAL RESPONSE**

We recommended that SSA consider the use of a shipping service that tracks folders because the current arrangements WBFSO has with the USPS does not include tracking. Without this tracking capability, which is usually provided by commercial shippers, SSA may not be able to locate folders lost during shipment. SSA's National Records Center in Kansas City, Missouri currently uses Federal Express for shipment services and informed us that the tracking service has been beneficial to its operations when a user claims that a folder was not received. We continue to believe that SSA should evaluate the use of a shipping service that tracks WBFSO shipments.

SSA places the contents of case folders at risk of loss when the contents are loosely filed. Once a folder leaves WBFSO's possession, there is no guarantee that the user will take the measures necessary to safeguard the folder's loose contents. We encourage SSA to establish procedures to safeguard the contents of folders throughout the entire shipping process.



James G. Huse, Jr.

# *Appendices*

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APPENDIX A – Sampling Methodology and Results

APPENDIX B – Agency Comments

APPENDIX C – OIG Contacts and Staff Acknowledgments

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## **Sampling Methodology and Results**

### **Methodology**

#### **Test of Electronic Inventory**

To test the electronic inventory, we traced a statistical sample of 300 folders recorded in SSICS as located in the WBFSSO on December 5, 2002, to their physical location within the facility.

<b>Universe</b>	<b>Universe Size</b>	<b>Sample Size</b>	<b>Selection Date</b>	<b>Selection Criteria</b>
All Folders in SSICS coded L00	4,622,979	300	12/5/02	SSN

#### **Test of Physical Inventory**

To test the physical inventory, we traced a statistical sample of 300 case folders physically located at the facility on December 3, 2002, to SSICS and FCS. Folders are filed at WBFSSO based on their terminal digits (the last four digits of a Social Security number). To select the folders, we randomly selected 300 terminal digit numbers between 0001 and 9999. For each randomly selected number, we chose the first folder stored in this terminal digit range.

<b>Universe</b>	<b>Universe Size</b>	<b>Sample Size</b>	<b>Selection Date</b>	<b>Selection Criteria</b>
All Folders in SSICS coded L00	4,616,813	300	12/3/02	SSN Terminal Digits

Since we did not manually count the inventory of folders on December 3, 2002, we relied on the total number of folders identified in the computerized inventory on this date as our universe.

## Sampling Methodology and Results (continued)

### Results

<b>Results from Test of the Electronic Inventory</b>	<b>Sample Error</b>	<b>Projected Error</b>	<b>Projection Lower Limit</b>	<b>Projection Upper Limit</b>
Not Found at WBFSO	5	77,050	30,464	160,518

<b>Results from Tests of the Physical Inventory</b>	<b>Sample Error</b>	<b>Projected Error</b>	<b>Projection Lower Limit</b>	<b>Projection Upper Limit</b>
Recorded in SSICS as stored at a location other than WBFSO, lost, or inactive	7	107,726	50,791	200,269
Recorded as destroyed in SSICS but still in WBFSO inventory	6	92,336	40,375	180,474
Folders with loose contents	106	1,631,274	1,419,702	1,852,897

All projections were made at the 90-percent confidence level.

**Agency Comments**



## SOCIAL SECURITY

MEMORANDUM

32281-24-977

Date: September 4, 2003

Refer To: S1J-3

To: James G. Huse, Jr.  
Inspector General

From: Larry W. Dye /s/  
Chief of Staff

Subject: Office of the Inspector General (OIG) Draft Report, "Audit of the Wilkes-Barre Folder Servicing Operation" (A-04-03-13040)—INFORMATION

We appreciate the OIG's efforts in conducting this review. Our comments on the report content and recommendations are attached.

Please let us know if we can be of further assistance. Staff questions can be referred to Trudy Williams at extension 50380.

Attachment:  
SSA Response

**COMMENTS OF THE SOCIAL SECURITY ADMINISTRATION (SSA)  
ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT  
REPORT, "AUDIT OF THE WILKES-BARRE FOLDER SERVICING  
OPERATION" (A-04-03-13040)**

Thank you for the opportunity to review and comment on the subject draft report. Our response to the specific recommendations is provided below.

The objective of the audit was to determine the accuracy and condition of the physical and computerized inventory at the Wilkes-Barre Folder Servicing Operation (WBFSO).

The audit identified 1.7 percent of the folders recorded in Supplemental Security Income Control System (SSICS) as stored at the WBFSO that could not be located at the facility. Also, 2.3 percent of the folders were not properly recorded in SSICS as stored at the WBFSO although they were located at the facility and 2 percent of the folders stored at the WBFSO should have been destroyed.

Recommendation 1

SSA should determine the location of the five missing folders. If the folders cannot be located, determine the necessary corrective action that should be taken on these folders.

SSA Comment

We agree. Three of the five missing folders are eligible for destruction and will be destroyed if they are located. If the remaining two folders are located, we will receipt them into the SSICS to establish the proper location. If the two folders cannot be located, we will reconstruct them, if necessary. We anticipate completing this action by October 15, 2003.

Recommendation 2

SSA should perform a cost-benefit analysis on using a shipping service that tracks folders from the point of origin to the destination.

SSA Comment

We disagree. For years, SSA has used the USPS to send benefit checks, important notices, and many other official documents. The USPS has proven to be a reliable shipper. Annually tracking the movement of over two million folders to and from the WBFSO would be a monumental task far outweighing any benefit derived.

OIG appears to make the assumption that discrepancies between SSICS records of folder location in the FSO and the actual physical location not in the FSO arise from losses during shipping. It is useful perhaps to distinguish between the tracking of folders individually (SSICS) and the proposed tracking of shipments (boxes of folders). Folders slated for shipment can be

(and sometimes are) removed before shipment and this action is then not accurately recorded in SSICS. Tracking the box shipment would not remedy this situation.

### Recommendation 3

SSA should adjust SSICS to indicate that the seven folders recorded as stored at a location other than WBFSO, lost, or inactive are at WBFSO.

### SSA Comment

We agree. SSICS has been updated to indicate the proper location of the folders.

### Recommendation 4

SSA should destroy the six folders identified with expired destruction dates and remind the WBFSO contractor to follow the folder destruction schedule.

### SSA Comment

We agree. The six folders eligible for destruction were destroyed. We have reminded the WBFSO contractor to follow the folder destruction schedule.

### Recommendation 5

SSA should establish procedures to safeguard the contents of case folders during the shipping process.

### SSA Comment

We disagree. We believe the Agency already takes appropriate measure to secure case folders. Folders are placed in heavy-duty envelopes or boxes that are securely sealed and therefore, materials are not separated from folders during the shipping process.

### Recommendation 6

SSA should determine whether filing PE documents at WBFSO would be cost beneficial and more efficient than the current practice of storing PE documents at the Federal Record Center (FRC).

### SSA Comment

We agree. In August 2003, SSA's Office of Central Operations began forming a workgroup to develop storage options for the WBFSO. The workgroup will determine whether filing PE documents at the WBFSO would be a viable option rather than the current practice of storing PE documents at the FRC. The workgroup anticipates having the analysis of this recommendation available by January 1, 2004.



## **OIG Contacts and Staff Acknowledgments**

### ***OIG Contacts***

Mark Bailey, Director, Kansas City/Atlanta Audit Division (816) 936-5591

Frank Nagy, Deputy Director, Atlanta Office (404) 562-5552

### ***Staff Acknowledgments***

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