

OIG

Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

*Audit Report*

Accuracy of Auxiliary Payments to  
Children After Divorce

*A-13-11-21100 | May 2014*

**OIG** Office of the Inspector General  
SOCIAL SECURITY ADMINISTRATION

**MEMORANDUM**

**Date:** May 12, 2014

**Refer To:**

**To:** The Commissioner

**From:** Inspector General

**Subject:** Accuracy of Auxiliary Payments to Children After Divorce (A-13-11-21100)

The attached final report presents the results of our audit. Our objective was to determine whether the Social Security Administration terminated auxiliary benefits to a stepchild when a marriage between the beneficiary and the child's parent ended in divorce.

If you wish to discuss the final report, please call me or have your staff contact Steven L. Schaeffer, Assistant Inspector General for Audit, at (410) 965-9700.



Patrick P. O'Carroll, Jr.

Attachment

# Accuracy of Auxiliary Payments to Children After Divorce

## A-13-11-21100



May 2014

Office of Audit Report Summary

### Objective

To determine whether the Social Security Administration (SSA) terminated auxiliary benefits to a stepchild when a marriage between the beneficiary and the child's parent ended in divorce.

### Background

An individual is eligible for Old-Age, Survivors and Disability Insurance (OASDI) benefits as a stepchild if (1) his/her natural or adoptive parent married the beneficiary after the child was born or (2) he/she was conceived before the natural or adoptive parent married the beneficiary but was born after that marriage.

Pub. L. No. 104-121, the *Contract with America Advancement Act of 1996*, requires that, effective July 1996, a stepchild's entitlement to benefits end the month after the natural parent's divorce from the beneficiary. Before this change, the divorce had no effect on a stepchild's entitlement.

In 2003 and 2006, SSA's Office of Budget, Finance, Quality, and Management (OBFQM) assessed the accuracy of stepchild benefits. These studies identified over \$12 million in processing errors. OBFQM found that even when divorces were reported to the Agency, the termination action for the stepchild was often mishandled.

### Our Findings

SSA issued payments to auxiliary beneficiaries after the parents' divorce. We identified 1,390 stepchildren whom SSA determined were entitled to auxiliary OASDI benefits, and the beneficiary's marriage ended in divorce in or after June 2007. We randomly selected 60 of the 1,390 stepchildren to determine whether SSA properly terminated their benefits after the parents divorced.

Of the 60 beneficiaries sampled, we found SSA did not take appropriate action to terminate OASDI benefits for 11 stepchildren. Based on our analysis, we estimate SSA overpaid about \$3.1 million to 248 stepchildren. Unless SSA takes action to identify and correct these errors, we estimate the stepchildren will receive additional overpayments of approximately \$479,000 until they reach age 18 or are older and a full-time student.

### Our Recommendations

We recommend SSA:

1. Review the benefits for the 11 stepchildren we identified, collect OASDI overpayments, and initiate termination actions, as appropriate.
2. Determine and implement the most cost-effective process to prevent and detect overpayments to stepchildren after the parents' divorce.

SSA agreed with our recommendations.

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## ABBREVIATIONS

C.F.R.	Code of Federal Regulations
MBR	Master Beneficiary Record
OASDI	Old-Age, Survivors and Disability Insurance
OBFQM	Office of Budget, Finance, Quality, and Management
OIG	Office of the Inspector General
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
U.S.C.	United States Code

## OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) terminated auxiliary benefits to a stepchild when a marriage between the beneficiary<sup>1</sup> and the child's parent ended in divorce.

## BACKGROUND

SSA administers the Old-Age, Survivors and Disability Insurance (OASDI) program under Title II of the *Social Security Act*. The OASDI program provides benefits to qualified retired and disabled workers and their dependents as well as survivors of insured workers.<sup>2</sup>

An individual is eligible for OASDI benefits as a stepchild if

- his/her natural or adoptive parent married the beneficiary after the child was born or
- he/she was conceived before the natural or adoptive parent married the beneficiary but was born after that marriage.<sup>3</sup>

Pub. L. No. 104-121, the *Contract with America Advancement Act of 1996*, requires that, effective July 1996, a stepchild's entitlement to benefits end the month after the natural parent's divorce from the beneficiary. Before this change, a divorce had no effect on a stepchild's entitlement. If the beneficiary legally adopted the stepchild, entitlement may have continued after the divorce. Further, if the beneficiary died, the stepchild's entitlement to benefits did not end.

In 2003 and 2006, SSA's Office of Budget, Finance, Quality, and Management (OBFQM)<sup>4</sup> assessed the accuracy of stepchild benefits.<sup>5</sup> These studies identified over \$12 million in processing errors. OBFQM found that even when divorces were reported to the Agency, the termination action for the stepchild was often mishandled. Specifically, the studies reported the stepchild's benefits were

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<sup>1</sup> In this report, the term "beneficiary" refers to the wage earner (numberholder) upon which the stepchild's benefits are based.

<sup>2</sup> *Social Security Act* § 201 et seq., 42 U.S.C. § 401 et seq.

<sup>3</sup> If the beneficiary is alive when the child applies, the child must have been his/her stepchild for at least 1 year immediately preceding the day the child applies. If the beneficiary is deceased when the child applies, the child must have been his/her stepchild for at least 9 months immediately preceding the day the beneficiary died. The 9-month requirement is not applicable if the marriage between the beneficiary and the natural or adoptive parent lasted fewer than 9 months under certain conditions.

<sup>4</sup> Effective October 1, 2013, the Office of Quality Performance was realigned under the Office of the Deputy Commissioner for Budget, Finance, Quality, and Management.

<sup>5</sup> SSA OBFQM, *Unreported Divorces/Stepchild Terminations a Source of Title II Improper Payments*, March 2008. Both studies were discussed in the March 2008 report.

- not terminated in cases where the natural parent's benefits were terminated because of divorce, which resulted in an overpayment to the stepchild or
- in a suspended payment status instead of being terminated, which impacted the benefits of other auxiliary beneficiaries on the record.<sup>6</sup>

The 2003 study also found the stepchild's benefits were not terminated in the correct month. However, the 2006 study reported this issue had been corrected.

To conduct our review, we obtained an electronic data extract from SSA's Master Beneficiary Record (MBR) as of September 2012. The data extract contained 15,702 records indicating (a) a stepchild was on the record; (b) a marriage end date of July 1996 or later; and (c) the marriage ended in divorce or annulment/voidable. We applied additional screening criteria to these records and identified 1,390 stepchildren whom SSA determined were entitled to auxiliary OASDI benefits, and the beneficiary's marriage ended in divorce in or after June 2007.<sup>7</sup> We randomly selected 2 samples from the 1,390 stepchildren to determine whether SSA had properly terminated their OASDI benefits after their parents divorced. One sample included 30 stepchildren in current payment status as of September 2012 (Sample Frame 1), and the other sample included 30 stepchildren in a non-payment status as of September 2012 (Sample Frame 2). See Appendix A for a discussion of our scope and methodology and Appendix B for our sampling methodology and results.

## RESULTS OF REVIEW

Stepchildren continued receiving OASDI benefits after their parents divorced. Of the 60 stepchildren we reviewed, 11 were improperly paid. As a result, the stepchildren received about \$150,000 in OASDI overpayments. Further, an additional \$31,000 in overpayments could accrue over the life of the claims<sup>8</sup> if SSA does not take action to correct these errors. Finally, OBFQM had previously identified issues related to the posting of child relationship data, and we found these problems continued.

### Payments to Stepchildren After Divorce

Of the 60 stepchildren reviewed, we found 11 (18 percent) did not have their OASDI benefit payments properly terminated. Based on our calculations, we estimate about 248 stepchildren's

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<sup>6</sup> Although the stepchildren did not receive benefits while in suspended pay status, any other entitled auxiliaries on the record may not be paid correctly until the stepchild's record is terminated. This type of error could result in an underpayment to other entitled beneficiaries.

<sup>7</sup> Since OBFQM reviewed terminations from July 1996 through May 2007 as part of its prior studies, our review focused on marriages that ended in June 2007 or later.

<sup>8</sup> According to C.F.R. §404.350, a child can receive benefits on the earnings record of a person insured for OASDI if the child is under age 18, the child is 18 years or older and has a disability that began before age 22, or the child is 18 years or older and qualifies for benefits as a full-time student.

payments were not terminated properly after the parents' divorce. These stepchildren received OASDI overpayments totaling approximately \$3.1 million. The amount of overpayments could increase by approximately \$479,000 if SSA does not take corrective actions.

We determined 6 of the 30 stepchildren's payments in Sample Frame 1 should have been terminated when the parents' marriages ended in divorce, but they were not. This resulted in approximately \$100,000 in OASDI overpayments (see Table 1) through October 2013. We found these stepchildren inappropriately received benefits up to 6 years after their payments should have been terminated.

**Table 1: Overpayments to Stepchildren in Current Payment Status as of September 2012**

Error Period	Duration of Improper Payments	Payment Status as of October 2013	Amount Overpaid as of October 2013	Estimated Potential Future Overpayments
11/11 – 9/13	23 months	suspended <sup>9</sup>	\$5,677	N/A <sup>10</sup>
4/09 – 10/13	55 months	current	\$20,836	\$1,568 <sup>11</sup>
6/12 – 10/13	17 months	current	\$9,636	\$18,810 <sup>12</sup>
2/12 – 10/13	21 months	current	\$14,401	\$4,837 <sup>13</sup>
11/07 – 10/13	72 months	current	\$42,603	\$5,845 <sup>14</sup>
12/11 – 5/13	18 months	terminated	\$6,606	-
<b>TOTAL</b>			<b>\$99,759</b>	<b>\$31,060<sup>15</sup></b>

As of October 2013, four of the six stepchildren were still in current payment status. Therefore, additional overpayments could subsequently accrue. If SSA does not take action to terminate

<sup>9</sup> This child had a technical dual entitlement. Technical entitlement exists when an individual is eligible to receive benefits on more than one record, but benefits are only payable on one record.

<sup>10</sup> We did not estimate potential overpayments for this stepchild. As of October 2013, the child was not receiving benefits on the stepparent's record. The child was in current payment status on the natural parent's record.

<sup>11</sup> We calculated the potential overpayment by multiplying the stepchild's latest monthly benefit amount by the number of months until he/she reached age 18. We did not adjust our estimate for future cost-of-living increases.

<sup>12</sup> Id.

<sup>13</sup> According to SSA's records, the stepchild was over age 18 and qualified for benefits as a full-time student. We calculated the potential overpayment by multiplying the stepchild's latest monthly benefit amount by the number of months until he/she was no longer a full-time student. We did not adjust our estimate for future cost-of-living increases.

<sup>14</sup> Id.

<sup>15</sup> The estimated future overpayments covered a period of 4 to 33 months.

benefit payments to these stepchildren, we estimate an additional \$31,000 in overpayments could be made until these children reach age 18 or are older and a full-time student.

In Sample Frame 2, we determined 5 of the 30 stepchildren who were in non-payment status as of September 2012 were overpaid after the parents' marriage ended in divorce. This resulted in approximately \$50,000 in OASDI overpayments (see Table 2).

**Table 2: Overpayments to Stepchildren in a Non-Payment Status as of September 2012**

Error Period	Duration of Improper Payments	Overpayment Amount
8/07 – 2/10	31 months	\$7,243
7/10 – 4/11	10 months	\$3,710
3/08 – 8/08	6 months	\$2,580
9/07 – 6/11	46 months	\$22,105
1/09 – 2/11	26 months	\$14,601
<b>TOTAL</b>		<b>\$50,239</b>

We found these stepchildren incorrectly received benefits for up to 4 years, until they were terminated by the system for other reasons. Specifically, the stepchildren were terminated

- because they reached age 18 or 19 and were not disabled or
- because they were no longer full-time students and were between ages 18 and 19 or were a disabled child and were no longer disabled.

In the 11 error cases, we found SSA had correctly terminated the natural/adoptive parent's benefits after the divorce. However, the Agency failed to properly terminate benefits for the stepchildren. This occurred because SSA staff did not post the child relationship end date after the parents' divorce. Consequently, the stepchildren continued receiving benefits. We recommend SSA review these cases to initiate termination and collect the OASDI overpayments, as appropriate.

Based on our sample results, we estimate about 248 stepchildren's benefits were not terminated properly after the parents' divorce and therefore they received OASDI overpayments totaling approximately \$3.1 million. Further, unless SSA takes action to correct these errors, we estimate the stepchildren could receive additional overpayments of approximately \$479,000. As such, we recommend SSA take action to detect any additional stepchildren who are improperly receiving benefits.

In November 2013, we discussed the error cases with SSA. Operations staff members informed us it was their practice not to review cases while the audit was ongoing. Staff will review our application of SSA policy and confirm our overpayment calculations after we conclude our

audit; therefore, the errors we identified may change, and stepchildren may continue receiving payments to which they are not entitled.

## Initiatives to Prevent and Detect Overpayments

In its March 2008 report, OBFQM reported that many of the errors related to stepchild terminations were preventable if the Agency made certain system enhancements and addressed policy/procedural issues. Based on our results, SSA needs to take actions to prevent and detect future occurrences.

### *Child Relationship Data Not Posted*

The child relationship screen records the details of the child's relationship to the beneficiary. It documents the initial claims determination and any subsequent updates on the MBR. According to SSA's policy, these data must be present for every child beneficiary.<sup>16</sup> The Title II Redesign Entitlement and Eligibility process uses data from the child relationship screen to resume, reinstate, suspend, or terminate benefits for children. If the child relationship end date is present, the system processes a termination action. Specifically, SSA's regular transcript attainment and selection pass (1) selects cases in which the child relationship end date is the month before the current processing month for child claimants in payment status and (2) sends the Social Security numbers to the Title II Redesign child relationship module to terminate benefit payments.

Under the Title II Redesign, two separate input actions by SSA staff must be made to terminate both the natural parent and stepchild's benefit payments. Specifically, it requires that SSA staff update the beneficiary marriage and child relationship screens. OBFQM previously reported<sup>17</sup> the failure to make separate inputs on two different screens was the root cause of SSA not correctly terminating benefits to stepchildren. We determined this problem still existed. As discussed above, we also found SSA staff had not posted the child relationship end date after the parents' divorce for our 11 error cases. To prevent overlooked stepchild payment terminations, SSA should modify its process for recording child relationship data or consider automating the termination process so the stepchild's entitlement would automatically stop when the natural parent divorces the beneficiary.

### *Actions Not Taken for Reported Divorces*

Although SSA had divorce information pertaining to our error cases, the stepchildren continued receiving benefits for several months or years after the parents' divorce. During our review, we inquired about any recently completed, ongoing, or planned initiatives the Agency had in place to improve payment accuracy for stepchildren. SSA's Office of Operations reported it was not aware of any such initiatives. Further, we learned the Office of Systems did not have an

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<sup>16</sup> SSA, POMS, SM 03020.070.A (effective October 20, 2010).

<sup>17</sup> SSA OBFQM, *Unreported Divorces/Stepchild Terminations a Source of Title II Improper Payments*, March 2008.

approved information technology proposal<sup>18</sup> to address the suggested modifications in OBFQM's report.

In its March 2008 report,<sup>19</sup> OBFQM suggested the Agency periodically match known divorces with stepchild information to identify overlooked stepchild terminations. In November 2013, we confirmed SSA had not performed any such matches. Had the Agency performed a periodic match or taken other equivalent actions, it may have detected the errors we identified much earlier and reduced the amount of overpayments.

## CONCLUSIONS

SSA issued payments to auxiliary beneficiaries after the parents divorced. Of the 60 beneficiaries sampled, we found SSA did not take appropriate action to terminate OASDI benefits for 11 stepchildren. As a result, the stepchildren received about \$150,000 in OASDI overpayments. Further, an additional \$31,000 in overpayments could accrue if SSA does not terminate the stepchildren's records. Also, OBFQM previously reported issues related to the posting of child relationship data, and we found these problems continue. Based on our analysis, we estimate SSA overpaid about \$3.1 million to 248 stepchildren. Unless SSA takes action to identify and correct these errors, we estimate the stepchildren will receive additional overpayments of approximately \$479,000. To ensure this does not happen in the future, SSA should consider (a) modifying the input process for stepchild terminations, (b) implementing concurrent termination actions for both the natural parent and stepchild after divorce, and/or (c) establishing an automated periodic review of proven divorces to detect overlooked stepchild terminations.

The President's Budget for Fiscal Years 2013 through 2015 includes a legislative proposal to terminate benefits for a stepchild in the same month as benefits are terminated for a parent. SSA believes this proposal would address a significant part of this problem, and the Agency continues to support it.

## RECOMMENDATIONS

We recommend SSA:

1. Review the benefits for the 11 stepchildren we identified, collect OASDI overpayments, and initiate termination actions, as appropriate.
2. Determine and implement the most cost-effective process to prevent and detect overpayments to stepchildren after the parents' divorce.

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<sup>18</sup> Information technology projects are approved by SSA's Strategic Information Technology Assessment and Review Board.

<sup>19</sup> SSA OBFQM, *Unreported Divorces/Stepchild Terminations a Source of Title II Improper Payments*, March 2008.

## AGENCY COMMENTS

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

# *APPENDICES*

## Appendix A – SCOPE AND METHODOLOGY

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To accomplish our objective, we:

- Obtained and reviewed applicable Federal laws and regulations and pertinent sections of the Social Security Administration’s (SSA) Program Operations Manual System (POMS), Modernized Systems Operations Manual, and SSA Handbook.
- Reviewed prior Office of Budget, Finance, Quality, and Management and Office of the Inspector General reports pertaining to unreported marriages and divorces, and benefit payments to stepchildren.
- Interviewed personnel from SSA’s Offices of Operations, Systems, and Retirement and Disability Policy.
- Obtained and analyzed a data extract from SSA’s Master Beneficiary Record (MBR) as of September 2012. See Appendix B for detailed information.
- Selected 2 random samples of 30 stepchildren. For the sampled cases, we examined information in SSA’s MBR, Numident, Representative Payee System, Modernized Claims System, and Claims File Records Management System.
- For each sampled case, we:
  - ✓ Determined whether the stepchild received benefits after the parents’ divorce. Specifically, we determined whether the stepchild was still in current payment status. If the stepchild’s payment was terminated, we determined whether the termination occurred timely.
  - ✓ Confirmed the divorced spouse was the stepchild’s natural or adoptive parent.<sup>1</sup>
  - ✓ Determined whether the divorce between the beneficiary and natural/adoptive parent was proven.<sup>2</sup>
  - ✓ Determined whether the stepchild was inappropriately placed in a suspended status instead of being terminated. If applicable, evaluated the effects on other auxiliary beneficiaries on the record.

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<sup>1</sup> Marital information on the MBR was not always complete. For six sample cases, we found the marriage between the beneficiary and the stepchild’s natural/adoptive parent was not posted on the MBR. However, since we did not identify any evidence of divorce or annulment, we presume this is the beneficiary’s current spouse, and thus, the stepchild could continue receiving benefits. In November 2013, we discussed this issue with SSA.

<sup>2</sup> According to SSA policy, proof of divorce is generally required. However, an allegation of divorce is acceptable if the termination of marriage is also a terminating event for benefits. SSA, POMS, GN 00305.140 (effective October 31, 2011).

- ✓ Determined whether the beneficiary had legally adopted the stepchild, as he/she may still qualify for benefits as the beneficiary's adopted child.
  - ✓ Determined whether administrative finality applied.<sup>3</sup>
  - ✓ Determined whether the divorce was applicable to other stepchildren on the record.
  - ✓ Identified the period in which the stepchild was inappropriately receiving benefits and calculated the estimated overpayment.
- Assessed the system controls that SSA had in place to ensure auxiliary benefits to stepchildren were terminated when the marriage between the beneficiary and the parent ended.
  - Identified the recently completed, ongoing, and planned initiatives SSA had in place to improve payment accuracy for stepchildren.

We conducted our review at SSA's Headquarters in Baltimore, Maryland, from April through November 2013. We found the data used for this audit to be sufficiently reliable to meet our audit objective. Further, any data limitations were minor in the context of this assignment, and the use of the data should not lead to an incorrect or unintentional conclusion. The primary entities audited were the Offices of the Deputy Commissioners for Operations, Systems, and Retirement and Disability Policy.

We conducted our review in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

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<sup>3</sup> The applicability of administrative finality depends on the facts of each case. According to information provided by SSA staff, administrative finality does not apply to the cases in our sample. SSA, POMS, GN 04001.030.B (effective December 22, 1989) and GN 03101.040.B (effective June 17, 2011).

## Appendix B – SAMPLING METHODOLOGY AND RESULTS

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We obtained and analyzed data extracted from the Social Security Administration’s (SSA) Master Beneficiary Record (MBR). As of September 2012, we had identified 1,390 stepchildren from all 20 segments of the MBR that met the following screening criteria.

- A stepchild was present on the record.
- The record contained a Marriage End Date of June 2007 or later.<sup>1</sup>
- The Marriage End Reason was Divorce.<sup>2</sup>
- The stepchild had a ledger account file code<sup>3</sup> other than N (disallowed), ND (denied), T3 (terminated by the divorce, marriage, or remarriage of the beneficiary) or T1 (terminated because of death of the beneficiary).

We separated these stepchildren into two Sample Frames.

- SAMPLE FRAME 1 —463 stepchildren in current payment status as of September 2012.
- SAMPLE FRAME 2 — 927 stepchildren who were not in current payment status as of September 2012.<sup>4</sup>

We selected a random sample of 30 stepchildren from each sample frame, for a total of 60 stepchildren. For each sample item, we reviewed SSA’s records to determine whether the Agency properly terminated auxiliary benefits to stepchildren when the marriage between the beneficiary and the child’s parent ended in divorce.

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<sup>1</sup> Since the Office of Budget, Finance, Quality, and Management reviewed terminations from July 1996 through May 2007 as part of its prior studies, our review focused on marriages ending in June 2007 or later.

<sup>2</sup> Less than 1 percent (22 of the 15,702 records) involved an annulled marriage. Therefore, we focused our efforts on marriages ending in divorce.

<sup>3</sup> These codes indicate the payment status of the beneficiary. SSA, POMS, SM 00550.020 (effective May 15, 2009).

<sup>4</sup> The stepchildren in Sample Frame 2 had a ledger account file code of either D, S, T, or X. All of these codes indicate the beneficiary is not receiving monthly benefits. SSA, POMS, SM 00550.020 (effective May 15, 2009).

**Table B-1: Population and Sample Size**

	Sample Frame 1	Sample Frame 2	Total Number of Stepchildren
Population Size	463	927	1,390
Sample Size	30	30	60

Based on our two samples, we determined SSA overpaid about \$150,000 in Old-Age, Survivors and Disability Insurance (OASDI) benefits to 11 stepchildren. Using a straight-line methodology,<sup>5</sup> we estimate about 248 stepchildren were not terminated properly after the parents' divorce. These stepchildren received OASDI overpayments totaling approximately \$3.1 million as of October 2013. Unless SSA takes action to correct these errors, we estimate additional overpayments of approximately \$479,000 could accrue until these children reach age 18 or older and a full-time student.

**Table B-2: Overpayments to Stepchildren in Current Payment Status as of September 2012**

	Number of Stepchildren	OASDI Overpayments as of October 2013	Estimated Potential Future Overpayments
Sample Results	6	\$99,759	\$31,060
Straight-Line Estimate	93	\$1,539,614	\$479,359

**Note:** We used a straight-line estimation method to calculate the number of stepchildren and related overpayments. The estimates assume all variables remain equal.

**Table B-3: Overpayments to Stepchildren in Non-Payment Status as of September 2012**

	Number of Stepchildren	OASDI Overpayments
Sample Results	5	\$50,239
Straight-Line Estimate	155	\$1,552,385

**Note:** We used a straight-line estimation method to calculate the number of stepchildren and related overpayments. The estimates assume all variables remain equal

<sup>5</sup> We based our straight-line estimate on the following equation: Population Size/Sample size x Sample Results.

## Appendix C – AGENCY COMMENTS

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## SOCIAL SECURITY

### MEMORANDUM

Date: April 18, 2014 Refer To: SIJ-3

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

From: Katherine Thornton /s/  
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, “Accuracy of Auxiliary payments to Children After Divorce” (A-13-11-21100) -- 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 Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,  
“ACCURACY OF AUXILIARY PAYMENTS TO CHILDREN AFTER DIVORCE”  
(A-13-11-21100)**

**Recommendation 1**

Review the benefits for the 11 stepchildren we identified, collect OASDI overpayments, and initiate termination actions, as appropriate.

**Response**

We agree. We will review the 11 identified cases and take appropriate corrective action by July 2014.

**Recommendation 2**

Determine and implement the most cost-effective process to prevent and detect overpayments to stepchildren after the parents' divorce.

**Response**

We agree. We will analyze the sample cases from this review to determine what actions are cost-effective and feasible to prevent overpayments to stepchildren. We will complete this analysis by the end of fiscal year 2014.

## Appendix D – MAJOR CONTRIBUTORS

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Shirley E. Todd, Director

Florence Wolford, Audit Manager

Melinda Byrd, Senior Auditor

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