



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

Old-Age, Survivors and Disability
Insurance Benefits to Individuals
Who Are Recorded as Deceased on
the Supplemental Security Record

A-13-17-50176 | December 2020

MEMORANDUM

Date: December 9, 2020

Refer To:

To: The Commissioner

From: Inspector General

Subject: Old-Age, Survivors and Disability Insurance Benefits to Individuals Who Are Recorded as Deceased on the Supplemental Security Record (A-13-17-50176)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration was incorrectly issuing Old-Age, Survivors and Disability Insurance benefits to individuals who were recorded as deceased on the Agency's Supplemental Security Record.

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



Gail S. Ennis

Attachment

Old-Age, Survivors and Disability Insurance Benefits to Individuals Who Are Recorded as Deceased on the Supplemental Security Record

A-13-17-50176



May 2020

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) was incorrectly issuing Old-Age, Survivors and Disability Insurance (OASDI) benefits to individuals who were recorded as deceased on the Agency's Supplemental Security Record (SSR).

Background

The OASDI program provides benefits to retired and disabled workers, including their dependents and survivors. Under OASDI, benefits are not payable for the month of the beneficiary's death and later. SSA records OASDI payments on its Master Beneficiary Record (MBR). The Supplemental Security Income (SSI) program provides payments to financially needy individuals who are aged, blind, or disabled. Under the SSI program, payments are not payable the month after the recipient's death and later. SSA records SSI payments on the SSR. When SSA receives a death report, policy requires that it terminate the decedent's payments, record death information on the Numident and payment records, and initiate recovery for any payments issued for the month of death and later.

In December 2017, we referred to SSA 233 beneficiaries to whom the Agency continued issuing OASDI benefits but who had dates of death on the SSR.

Findings

SSA incorrectly paid \$1.1 million to 63 individuals. This consisted of approximately

- \$1 million in OASDI benefits to 23 individuals whom SSA recorded as deceased on the SSR; and
- \$111,000 in underpayments due 40 SSI recipients.

There were no payment errors for the remaining 170 beneficiaries we reviewed for whom SSA had inconsistent death information on its records.

All 233 beneficiaries we referred to SSA had errors on their records—either the death on the SSR was incorrect and the beneficiary was still alive or OASDI payments were being issued to a deceased beneficiary. SSA reported the 233 beneficiary death discrepancies occurred because of administrative or data entry errors. SSA corrected the death discrepancies during this audit thereby preventing additional incorrect payments.

Agency Actions Resulting from the Audit

As of May 2020, SSA had terminated benefits to 23 deceased beneficiaries and initiated recovery of approximately \$985,000 in incorrect payments. For the 233 beneficiaries we identified, where appropriate, SSA either removed the incorrect dates of death from the SSR or posted the correct dates of death to the Numident and MBR/SSR. As of July 2020, the Agency issued SSI underpayments totaling approximately \$48,000.

Recommendations

We made two recommendations related to the beneficiaries we identified and one recommendation for SSA to prevent date of death discrepancies between the MBR and the SSR.

SSA agreed with our recommendations.

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ABBREVIATIONS

MBR	Master Beneficiary Record
OARO	Office of Analytics, Review, and Oversight
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSI	Supplemental Security Income
SSR	Supplemental Security Record
Treasury	Department of the Treasury
U.S.C.	United States Code

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) was incorrectly issuing Old-Age, Survivors and Disability Insurance (OASDI) benefits to individuals who were recorded as deceased on the Agency's Supplemental Security Record (SSR).

BACKGROUND

The OASDI program provides monthly benefits to retired and disabled workers, including their dependents and survivors.¹ Under OASDI, benefits are not payable for the month of the beneficiary's death and later.² The Supplemental Security Income (SSI) program provides payments to financially needy individuals who are aged, blind, or disabled.³ Under the SSI program, payments are not payable the month after death and later.⁴ SSA records OASDI payments on the Master Beneficiary Record (MBR)⁵ and SSI payments on the SSR.⁶

When SSA receives a death report, policy requires that it record death information on the Numident.⁷ The system SSA uses to record death information automatically sends it to the Agency's payment systems to terminate the decedent's benefits and initiate recovery of any payments issued for the month of death and later.⁸ Before December 2015, to identify and prevent incorrect payments to deceased beneficiaries, SSA used its Death Alert, Control and Update System to match reports of death from Federal, State, and local agencies against the MBR or SSR.

In December 2015, SSA implemented the Death Information Processing System to add, change, or remove beneficiaries and non-beneficiaries' death information from the Numident.⁹ Once the System records the death information on the Numident, it automatically sends that information to

¹ *Social Security Act*, 42 U.S.C. §§ 402, 423 (govinfo.gov 2018).

² SSA, *POMS*, GN 02408.610, A.1 (June 20, 2019).

³ *Social Security Act*, 42 U.S.C. § 1381 (govinfo.gov 2018); 20 C.F.R. §§ 416.101, 416.110 (govinfo.gov 2019).

⁴ SSA, *POMS*, SI 02301.250, A.1 (January 4, 2016).

⁵ The MBR contains payment and other background information on all OASDI beneficiaries. SSA establishes the record when it receives an initial claims action. The Agency uses the information from the MBR to determine eligibility and benefit amounts, and administer the OASDI program.

⁶ The SSR contains payment and other information on all SSI recipients. SSA establishes the record when it receives an application for SSI payments. The Agency uses the information from the application and other sources to determine eligibility for, and administer, the SSI program.

⁷ SSA records death information on the Numident, an electronic file that contains information for each individual issued a Social Security number.

⁸ SSA, *POMS*, GN 02408.005, C (November 3, 2008), SSA, *POMS*, GN 02602.050, A (September 3, 2019), and SSA, *POMS*, GN 02230.018 (July 22, 2010).

⁹ SSA, *POMS*, GN 02602.051, A (October 5, 2017).

the Agency’s payment systems to be recorded on the beneficiary’s MBR or SSR, if those records exist. SSA employees must review an individual’s record to ensure staff correctly posts information to the Numident and payment records.¹⁰

SSA’s Death Alerts Tracking System contains a list of death alerts employees need to resolve. SSA’s systems generate death alerts for employees to resolve when (1) a third-party death report for the beneficiary must be verified, (2) the decedent’s name on the payment record does not match the Numident, (3) the Death Information Processing System was not used to input death information, and/or (4) the death information is on the Numident but not the MBR and/or SSR.¹¹ In Calendar Year 2019, SSA reported it processed 163,422 death alerts.

In a 2018 report, we found SSA needed to improve controls to ensure it resolves death discrepancies between the Numident and MBR or SSR. We estimated 7,094 beneficiaries had unresolved death discrepancies between the Numident and MBR or SSR. Additionally, we estimated SSA had not detected approximately \$1.4 million incorrectly issued after the deaths of 697 beneficiaries.¹²

According to SSA, timely input of reports of death prevents incorrect payments.¹³ Payment errors occur when the Agency does not receive notifications of death, receives delayed notifications of death, or receives incorrect dates of death. For Fiscal Year (FY) 2018, SSA reported, “Approximately 58 percent of all death-related deficiency dollars resulted in [overpayments] for [the Old-Age and Survivors Insurance]” program¹⁴

For our current review, we identified 233 OASDI beneficiaries in current pay as of December 2017 who had a corresponding terminated SSR with a recorded date of death. For these records, the dates of death ranged from 1974 through 2017. According to SSA’s records, the Agency continued issuing OASDI benefits to these individuals despite dates of death on the SSR. In December 2017, we referred these beneficiaries to SSA for review and the Agency subsequently took action to correct the records. See Appendix A for more information.

RESULTS OF REVIEW

SSA incorrectly issued OASDI benefits to individuals recorded as deceased on the SSR. Since the beneficiaries were deceased, SSA should have terminated their OASDI benefits. Additionally, some OASDI beneficiaries did not receive SSI payments to which they were entitled because the Agency erroneously recorded them as deceased. Of the 233 OASDI beneficiaries we reviewed, SSA incorrectly paid \$1.1 million to 63 beneficiaries. There were no

¹⁰ See Footnote 9.

¹¹ SSA, *POMS*, GN 02602.065, A (September 3, 2019).

¹² SSA, OIG, *Deceased Beneficiaries Who Had Different Dates of Death on the Social Security Administration’s Numident and Payment Records*, A-09-17-50259 (March 2018).

¹³ SSA, OARO, *Fiscal Year 2019 Title II Death Probe Report*, p. 6 (January 2020).

¹⁴ SSA, OARO, *Fiscal Year 2018 Title II Payment Accuracy Report*, p. 13 (June 2019).

payment errors for the remaining 170 beneficiaries we reviewed. SSA reported the death discrepancies occurred because of administrative or data entry errors.

Death Discrepancies

Of the 233 beneficiaries,

- 23 were deceased, and SSA incorrectly paid them approximately \$1 million in OASDI benefits;
- 19 died after we referred them to SSA, so the earlier date of death on the SSR was erroneous; and
- 191 were alive when we concluded our assessment and SSA resolved the death discrepancies.¹⁵ Of these, 40 had a prior period of SSI eligibility resulting in SSI underpayments of approximately \$111,000.¹⁶

Benefits Issued to Deceased Beneficiaries

SSA incorrectly issued OASDI benefits to individuals recorded as deceased on the SSR. In November 2019, SSA's Office of Operations verified 23 of the 233 beneficiaries continued receiving OASDI benefits despite having dates of death on the SSR.¹⁷

We found the beneficiaries' payment records had either (1) a valid death recorded on the SSR when we referred the beneficiaries for review or (2) unresolved death discrepancies between the MBR or SSR. An incorrect date of death on the MBR or SSR could result in undetected incorrect payments to deceased beneficiaries and/or survivors. SSA's Office of Operations confirmed beneficiaries' payment records had death discrepancies and reported the discrepancies occurred because of administrative or data entry errors. As a result, SSA incorrectly paid the 23 beneficiaries approximately \$1 million in OASDI benefits. See Appendix B for list of deceased beneficiaries to whom SSA issued incorrect payments.

To determine whether the beneficiaries were alive, Office of Operations' employees reviewed beneficiaries' payment records and obtained death-related supporting documentation. Agency

¹⁵ As of March 2020, for one beneficiary, SSA staff reported it obtained information that indicated the individual was alive after November 28, 1997, the date of death on the SSR. The Agency is taking action to locate this individual.

¹⁶ As of July 2020, SSA paid approximately \$48,000 in SSI underpayments, leaving about \$63,000 in underpayments outstanding. For 27 of the 40 beneficiaries, SSA paid the total SSI underpayments. Underpayments are due to the 13 remaining SSI recipients.

¹⁷ Of the 23 beneficiaries, 21 had dates of death before the Agency implemented the Death Information Processing System. Two beneficiaries had dates of death before subsequent updates to the Death Information Processing System software.

employees also requested in-person and telephone interviews. When beneficiaries failed to respond, SSA took action to suspend or terminate OASDI benefits.

SSA staff reported the Agency has various information system controls to identify benefit payments issued for deceased beneficiaries. For example, SSA performs a monthly comparison of death data (recorded on the Numident) to the MBR and SSR. If there are death date discrepancies, the process generates alerts for field office resolution. Of the 23 beneficiaries, 10 had death information recorded on the Numident. Of the 10, 1 beneficiary required review and the Death Alert Tracking System generated a death alert for field office employees to resolve.

The Agency also uses a process to cross-reference beneficiaries with OASDI and SSI payment records. However, if SSA employees do not enter the cross reference process accurately, the MBR and SSR will not update to reflect the death information on both records. This will cause one payment record to be terminated when the beneficiary is deceased, but the other payment record will remain in current payment status. As of July 2020, SSA had not stated whether the failure of these controls resulted in the identified errors.

Actions to Recover Benefits Issued After Beneficiaries' Death

Generally, any benefits issued after the month of death and later are incorrect payments and not subject to SSA's overpayment recovery procedures.¹⁸ Instead, the Department of the Treasury (Treasury) is responsible for recovering these payments¹⁹ from financial institutions through a reclamation process.²⁰ SSA initiates the reclamation process by electronically submitting a request for stop payment to Treasury. Similarly, for electronic fund transfers, Treasury and the financial institution that received the payments are responsible for recouping the incorrect payments.²¹ However, Treasury only has the authority to reclaim incorrect paper check payments for the prior 12 months.²²

For the 23 beneficiaries, the Agency issued approximately \$1 million in incorrect payments.

- For five beneficiaries, SSA used Treasury's reclamation process to recover the full payment amounts, totaling approximately \$162,000.

¹⁸ SSA, *POMS*, GN 02201.001, F (October 18, 2017) and SSA, *POMS*, GN 02401.917 (February 18, 2020).

¹⁹ SSA, *POMS*, GN 02408.001 (March 13, 2019) and SSA, *POMS*, GN 02408.610, A.3 (June 20, 2019).

²⁰ Reclamation is the process Treasury uses to reclaim Federal benefit payments issued after death, for checks cashed over a forged signature, or for payments that were not due. Department of the Treasury, *Green Book*, ch. 5 (March 2020).

²¹ SSA, *POMS*, GN 02408.610, A.4 (June 20, 2019).

²² SSA, *POMS*, GN 02401.917, A (February 18, 2020) and SSA, *POMS*, GN 02408.301, C (March 6, 2019).

- For 16 beneficiaries, the Agency initiated approximately \$740,000²³ in reclamation recovery actions, of which SSA collected approximately \$317,000, leaving approximately \$423,000 uncollected; and
- For two beneficiaries, Treasury returned the credit of approximately \$30,000 to SSA for checks not cashed. However, approximately \$53,000 remained outstanding. In March 2020, SSA reported no further reclamation recovery actions were possible.

Of the 23 cases, our Office of Investigations reviewed allegations pertaining to 15 beneficiaries. For the remaining eight beneficiaries, SSA's Office of Operations reported two did not require referral to our Office of Investigations since the Agency recovered all the incorrect payments; and for six beneficiaries, the Agency reported it would submit investigation referrals, if necessary.

For example, in one case reviewed by our Office of Investigations, the beneficiary's SSR contained a date of death of September 23, 2004. In January 2018, an SSA employee contacted the Mississippi Bureau of Vital Records to obtain the beneficiary's date and place of death. SSA staff subsequently confirmed the date of death on the SSR was valid, terminated OASDI benefits, and resolved the death discrepancy between the MBR and SSR. The beneficiary's MBR showed SSA incorrectly paid approximately \$199,000 for the period November 2004 through January 2018. In August 2018, the Agency initiated approximately \$199,000 in reclamation recovery actions, of which all the incorrect payments remain outstanding as of May 2020.

Beneficiaries Due Supplemental Security Income Underpayments

SSA did not issue SSI payments due some OASDI beneficiaries because it erroneously recorded them as deceased. An underpayment occurs when a recipient does not receive a payment that is due or receives a payment that is less than the amount due.²⁴ We reviewed SSA's records for the 233 beneficiaries and found 40 were alive but erroneously recorded as deceased on the SSR. These individuals were due approximately \$111,000 in SSI underpayments, ranging from approximately \$3 to \$27,000. For example, a beneficiary's SSR contained a date of death of July 17, 2014. In November 2019, SSA reported an Agency employee conducted an in-person interview that confirmed the beneficiary was not deceased. The SSA employee removed the erroneous date of death from the beneficiary's SSR and resumed SSI payments. The individual was underpaid approximately \$15,000 in SSI from July 2014 through November 2019.

²³ For two beneficiaries, SSA initiated reclamation requests for approximately \$19,000 less than the full benefit amounts issued after death.

²⁴ SSA, *POMS*, SI 02101.001, A.1 (December 14, 2004).

AGENCY ACTIONS RESULTING FROM THE AUDIT

As of May 2020, SSA had terminated OASDI benefits to the 23 deceased beneficiaries, and initiated recovery actions for approximately \$985,000 in incorrect payments. For the 233 beneficiaries we reviewed, where appropriate, SSA either removed the incorrect deaths from the SSR, or posted the correct deaths to the Numident, MBR and/or SSR. As of July 2020, the Agency issued SSI underpayments totaling approximately \$48,000.

CONCLUSIONS

We identified 233 beneficiaries who had death discrepancies between the MBR and SSR. Of the 233, approximately \$1.1 million in incorrect payments pertained to 63 individuals. Of these, the Agency issued approximately \$1 million in incorrect OASDI benefits to 23 deceased beneficiaries. Additionally, 40 beneficiaries were determined alive and eligible to receive approximately \$111,000 in SSI underpayments. The Agency corrected the death discrepancies between the MBR and SSR, preventing additional incorrect payments after death. Removing incorrect deaths from beneficiaries' records will facilitate recipients receiving the appropriate payments they are due.

RECOMMENDATIONS

We recommend SSA:

1. Complete all appropriate actions to recover the payments the Agency incorrectly issued after the deaths of the 16 beneficiaries we identified in our audit.
2. Pay approximately \$63,000 due to 13 SSI recipients.
3. Assess whether additional death discrepancies occurred between the MBR and SSR after SSA system improvements in 2015 and 2016. If such discrepancies occurred, take necessary action to prevent future discrepancies.

AGENCY COMMENTS

SSA agreed with our recommendations. The full text of SSA's comments is included in Appendix C.



Michelle L. Anderson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

From the Social Security Administration’s (SSA) Master Beneficiary (MBR) and Supplemental Security Records (SSR), we obtained an electronic data extract of Old-Age, Survivors and Disability Insurance (OASDI) beneficiaries in current pay status with a corresponding SSR in a terminated pay status. This extract identified 884 beneficiaries, as of September 2017, who continued receiving OASDI benefits but had dates of death on the SSR.

We further applied several screening scenarios to the data to exclude beneficiaries who were not deceased. For example, we removed beneficiaries with name discrepancies on the MBR and SSR and beneficiaries with information in SSA’s systems indicating Agency staff previously reinstated benefits after determining the beneficiary was not deceased. After applying the additional screening scenarios, we identified and reviewed all 233 beneficiaries.

To accomplish our objective, we

- obtained and reviewed applicable Federal laws and regulations pertaining to the OASDI¹ and Supplemental Security Income² programs;
- reviewed SSA policies and procedures related to death reporting and prior Office of the Inspector General reports;
- identified SSA’s ongoing and planned initiatives to improve beneficiary death reporting;
- reviewed queries from MBRs and SSRs as well as payment histories for each beneficiary;
- obtained and reviewed the Department of the Treasury’s Treasury Check Information System to identify paper check and automated clearinghouse payments issued to deceased beneficiaries, and payment recoveries;
- referred the 233 beneficiaries to SSA for review and appropriate administrative action; and
- identified and documented SSA’s actions including quantifying incorrect payments after death and any related investigative referrals.

The principal entity reviewed was the Office of the Deputy Commissioner for Operations. We conducted our review in Baltimore, Maryland, between June 2019 to July 2020. We determined the data used in this report were sufficiently reliable given our review objective and its intended use. 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

¹ *Social Security Act*, 42 U.S.C. §§ 402, 423 (govinfo.gov 2018).

² *Social Security Act*, 42 U.S.C. § 1381 (govinfo.gov 2018); 20 C.F.R. §§ 416.101, 416.110 (govinfo.gov 2019).

Appendix B – BENEFITS ISSUED TO DECEASED BENEFICIARIES

The Social Security Administration incorrectly issued approximately \$1 million in Old-Age, Survivors and Disability Insurance (OASDI) benefits to 23 beneficiaries recorded as deceased on the Agency’s Supplemental Security Record (SSR). SSA recovered approximately \$509,000 as of May 2020.

Table B–1: OASDI Incorrect Payments Made to Deceased Beneficiaries

Beneficiary	Date of Death on the SSR	Incorrect Payments	Treasury Reclamation	Amount Recovered as of May 2020
1	September 11, 2014	\$29,273	Yes	\$1420
2	November 28, 2012	\$14,590	Yes	\$14,461
3	February 6, 2014	\$9,754	Yes	\$0
4	May 14, 2014	\$19,256	Yes	\$18,776
5	May 25, 2009	\$59,348	No ¹	\$13,245
6	October 3, 2014	\$14,646	Yes	\$820
7	May 28, 2014	\$37,533	Yes	\$335
8	November 10, 2000	\$234,730	Yes	\$217,516
9	September 23, 2004	\$199,224	Yes	\$0
10	September 2, 2015	\$9,282	Yes	\$9,282
11	October 7, 2015	\$20,706	Yes	\$9,863
12	November 30, 2013	\$23,506	No ¹	\$16,416
13	January 14, 2012	\$21,411	Yes	\$13,507
14	January 20, 2015	\$21,321	Yes	\$21,321
15	March 30, 2011	\$47,141	Yes	\$0
16	January 3, 2012	\$48,564	Yes	\$48,564
17	February 16, 2016	\$13,593	Yes	\$11,539
18	January 5, 2016	\$16,681	Yes	\$2,240
19	May 15, 2014	\$27,050	Yes	\$21,849
20	November 29, 2013	\$10,406	Yes	\$5,306
21	August 31, 2015	\$27,962	Yes	\$27,962
22	May 19, 2014	\$42,801	Yes	\$0
23	August 3, 2007	\$54,853	Yes	\$54,853
Total		\$1,003,631	21	\$509,275

¹ For two beneficiaries, SSA paid OASDI benefits after death via paper check and reported reclamation is no longer possible.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: November 17, 2020

Refer To:

To: Gail S. Ennis
Inspector General

Stephanie Hall

From: Stephanie Hall
Chief of Staff

Subject: Office of the Inspector General Draft Report, "Old-Age, Survivors and Disability Insurance Benefits to Individuals Who Are Recorded as Deceased on the Supplemental Security Record" (A-13-17-50176) – INFORMATION

Thank you for the opportunity to review the draft report. We agree with the recommendations.

Please let me know if we can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.



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