

**The Social Security Administration's Comprehensive Integrity Review Process**  
**A-14-17-50097**



September 2018

Office of Audit Report Summary

**Objective**

To determine whether the Social Security Administration (SSA) ensured its Comprehensive Integrity Review Process (CIRP) identified potentially fraudulent or improper employee transactions in the most cost-effective manner.

**Background**

CIRP identifies, and alerts supervisors to, potentially fraudulent or improper activities and transactions made by their employees in certain SSA systems. When a supervisor receives a CIRP alert, he/she must determine whether the employee's activity was proper or potentially involved violations of SSA's security policy or fraud. In Calendar Year 2016, CIRP generated 386,441 alerts.

Agencies must periodically review their control activities to ensure they are relevant and effective. Furthermore, agencies must (1) carry out information resource management activities to improve productivity, efficiency, and effectiveness of Federal programs and (2) implement appropriate capital programming and investment control processes for assessing and managing the risks with, and maximizing the value of, information technology acquisitions.

**Findings**

As of June 2018, SSA had not comprehensively evaluated CIRP to ensure it identified potentially fraudulent or improper employee transactions. The Agency had not maintained or updated a cost-benefit analysis for CIRP, and it was not tracking or estimating the resources required to address CIRP alerts. As a result, the Agency could not be certain that CIRP identified potentially fraudulent or improper transactions in the most cost-effective manner.

CIRP did not cover all systems that personnel used to query or update sensitive information. Furthermore, CIRP only alerted management to transactions that met the Agency's established criteria. Because of these limitations, potentially fraudulent or improper activity may have gone undetected.

SSA's Integrity Review Handbook contained obsolete and outdated information. We also found instances where CIRP alert selection criteria were available to non-supervisory employees on SSA's Intranet. Finally, some supervisors informed us they had certified CIRP alerts and suspected fraud, but did not report them to the Office of the Inspector General.

**Recommendations**

We recommend SSA:

1. Conduct a comprehensive review of CIRP to determine whether it identifies improper or fraudulent transactions in the most cost-effective manner.
2. Review CIRP alert criteria to determine whether (a) existing criteria remain appropriate and (b) additional criteria should be developed and implemented.
3. Review CIRP guidance, including the Integrity Review Handbook, to ensure it is accurate and current.
4. Ensure access to CIRP policy and procedures is limited to only those individuals who need it.
5. Review instructions and procedures to ensure that, when supervisors suspect fraud, the cases are referred to the Office of the Inspector General for potential criminal investigation.

SSA agreed with our recommendations.