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# Parental payment abuse within the Supplemental Security Income program

Darlean Taylor-King  
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# Walden University

COLLEGE OF MANAGEMENT AND TECHNOLOGY

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Darlean King

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2008

ABSTRACT

Parental Payment Abuse within the Supplemental Security Income Program

by

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MBA., Averett College, 1993

B.A., University of the District of Columbia, 1985

Dissertation Submitted in Partial Fulfillment  
of the requirements for the Degree of  
Doctor of Philosophy  
Applied Management and Decision Sciences

Walden University  
2008

## ABSTRACT

Management of Social Security Administration (SSA) has been challenged by the phenomena of overpayments with its Supplemental Security Income (SSI) program. Oversight authorities of SSA had expressed concerns about the overpayment abuse caused by parents as representative payees for disabled minor children. It was important to address this problem because the amount of overpayments prior to 1998 had caused integrity issues for management of SSA and increased federal debt from SSI claimants. The purpose of this study was to examine how management of SSA and the SSI program had responded to the concerns of the oversight authorities. Theoretical foundations for this study were based on systems concepts and theories as basic rationale for the examination of feedback from systems operation and for organizational learning about the phenomena of overpayments. This study employed a case study methodology using an approach that examined the SSI program and its operational procedures. The questions for this study involved inquiries into processes and procedures that were developed for improving payment accuracy of SSI claims. Data analysis was performed by comparing the change in overpayment amounts to the implementation of different technological and operational procedures for the SSI program over time using time series analysis. The results of this study suggested that technology that allows sharing communications between federal and state governmental organizations improved overpayment detection and collection for the SSI program. This sharing provided positive social change that could have implications for improved operational efficiency in many other social service programs in the United States.



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## DEDICATION

This study is dedicated to obtaining knowledge for change. “Thought is always operating in knowledge isn’t it. If there were no knowledge, thought would not be.

Thought is always operating in the field of the known”(Krishnamurti, 1991, pg. 36).



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## CHAPTER 1: INTRODUCTION TO THE STUDY

### Introduction

The Supplemental Security Income (SSI) program is a federal welfare program for low income aged, blind, and disabled people in the United States. The program is administered by Social Security Administration (SSA). When a disabled minor child (biological, adopted, or a stepchild) lives in the household of a parent that does not receive SSI payments, deeming rules are applied (SSA, 2007a). In the case of a child, deeming is the process of allocating a portion of a parent's income and resources to the child for determining monthly payment amount (SSA). Living arrangements of a parent are also important for determining a child's monthly payment amount for the SSI program (SSA). Information pertaining to changes in income, resources, and living arrangements affect the amount of deemed income to minor children.

Minor children that participate in the SSI program are required by law (47 FR 30475, July 14, 1982, as amended at 69 FR 60237, Oct. 7, 2004) to have an individual, or in some cases, an organization to act as representative payees (SSA 2007b). (SSA) reported that representative payees are selected by SSA. They are needed if individuals are determined unable to handle their funds. (SSA) the payee can be a person, agency, organization, or an institution.

SSA (2001a) stated that representative payees are required to use SSI payments to meet recipient needs. They should conserve and save payments that are not needed for current living demands (SSA). A record of expenses must be kept and any changes that could affect eligibility and/or payment amounts must be reported to employees of the SSI



program in a timely manner (SSA). Once the information is reported, SSA updates their records for payment of claims.

SSA (2003a) reported that the SSI program serviced approximately 6.7 million recipients and about half of its recipients were minor children. Representative payees were required for 5.3 million of those recipients. (SSA) found that of those 5.3 million representative payees, 84 % are parents or spouses. In 2003, they received \$44.4 billion in SSI payments.

For the SSI, program income can be earned, unearned, inkind, and deemed SSA, (2007a). Resources can be in the forms of cash, checking or saving accounts, stocks from companies, U.S. saving bonds in the names of recipients, land owned by recipients, life insurance policies, property and vehicles owned by recipients, deemed resources, or anything a recipient own that could be converted to cash (SSA). Living arrangements can be in a house, apartment, or mobile home that is rented or owned (SSA). They could live in other people homes, or they can live in a group or board care facility or in an institution. SSI payment amounts are dependent on income, resources, and living arrangements of recipients (SSA). If change occurs in income, resources, and living arrangements adjustments to payment amounts should made.

For assessing a child's monthly payment amount, parents have to participate by reporting changes that can occur in income, resources, and living arrangements. The SSI program has some challenges because eligibility and payments amounts are contingent on parent's income, resources, and living arrangements that can change on a monthly basis. According to Dyer (1999) the SSI program is dependent on participants to report income, resources, and living arrangement changes that may affect eligibility and payment

amounts of benefits. A common characteristic of the SSI program that makes it susceptible to fraudulent and abusive behavior and improper payments are participants' reporting behaviors (Young, 1983). SSA (2006a) reported that participants that do not report or report false, inaccurate, and/or incomplete information of changes in income, resources, and living arrangements contribute to overpayments of the SSI program.

Overpayments from the SSI program are the total amount of money a recipient receives that is more than what they should have received (SSA, 2007a). In 1997, the General Accounting Office (GAO) recognized the growth of recipients in the SSI program and media coverage of some program abuses (GAO, 1998a). The (GAO) compared their prior studies of management control deficiencies, poor management of debt, and complex policy issues and decided to designate the SSI program as a high risk program. The (GAO) found overpayments for year 1997 were \$2.6 billion. Recovery activities resulted in the collection of only \$437 million. The (GAO) concluded the amount of overpayments was unacceptable and so were management practices of the SSI program.

In 1990 the GAO started a program to assess government programs and functions that were identified as high risk. The Determining Performance and Accountability Challenges and High Risks are the guidelines used to designate federal programs as high risk (GAO, 2005b). The GAO reviews a program or a function to determine if the risk is an inherent problem or a system operation problem. The GAO determined three areas that were of major concern for the administration of the SSI program. GAO (1998a) reported the areas as: (a) eligibility of applicants and continuing eligibility after they received payments, (b) detection and collection of overpayments, and (c) fraud and abuse issues.

They were placed as high priority concerns for the administration of the SSI program. SSA (2002a) stated that the GAO also criticized SSA management for operational procedures that caused integrity issues for the SSI program.

The GAO (1998a) concluded that one of the reasons the SSI program was considered a high risk program was because of an agency culture of administering the SSI program as an entitlement program instead of a welfare program that required more effort and attention to income and asset verification. Management of the SSI program constantly faces challenges with verifying income, resources, and living arrangement changes of its recipients.

In addition to having concerns about the GAO, management adherence to various laws, for example, the Paperwork Reduction Act of 1980 (PRA) should also be considered when addressing the overpayment dilemma. Some purposes listed in the U.S. National Archives and Records Administration (2008) for the PRA:

Minimize the paperwork burden for individuals...Ensure the greatest possible public benefit from and maximize the utility of information created, collected, maintained, used, shared and disseminated by or for the Federal Government...The reduction of information collection burdens on the public and the improvement of service delivery to the public. (p. 1).

The first management responsibility listed in the PRA involves, “carrying out the agency’s information resources management activities to improve agency productivity, efficiency, and effectiveness” (PRA, 2008, p. 1).

There is a difference between overpayments and participant fraud. Overpayments can be caused by several reasons. Fraud occurs when a participant makes incorrect statements to deceive intentionally (SSA, 2000a). For example, it has been reported in the

media that parents encourage their children to fake mental problems so they can receive SSI payments (GAO, 1996). In 1994, SSA (2000a) reported that the Social Security Independence and Program Improvements Act of 1994 established an Office of Inspector General (OIG) for SSA. In August 1994, legislation (H. R. 4277) was signed by President Clinton, making SSA an independent agency. Since SSA became an independent agency, (SSA, 2000a) reported that the OIG is mandated by the Inspector General Act of 1978. The OIG is charged with the duty to perform several functions. One of OIG functions, according to (SSA), is in the prevention and detection of fraud, waste, and abuse in the SSI program. (SSA) noted that OIG has the authority to perform audits, evaluations, and investigations separately and objectively of agency operations.

#### Statement of the Problem

The problem this study examined was overpayment abuse caused by parents that are representative payees for disabled minor children. The effect of overpayments on a minor child's SSI record that is caused by a parent nonreporting behavior creates hardship for the child when he/she reaches the age of 18. SSA (2003a) found that parents that have minor disabled children receiving SSI payments represent about fifty percent of the beneficiaries of the SSI program.

Parents, as representative payees, are held responsible for reporting changes in income, resources, and living arrangements for a minor child (SSA, 2007a). If those changes are unreported for a considerable amount of time an overpayment occurs on the child's record (SSA). When the child reaches the age of eighteen and is no longer receiving SSI payments, he/she may be held liable for the repayment of overpayments, which they [the child] did not cause. The representative payee could be held responsible

if it can be proven the payments were not used on the child behalf (SSA). Information updates, that are crucial for claim payment accuracy, need to be improved so the integrity of the SSI program and the plight of disabled children could change for the better.

### Background of the Problem

A major challenge for management of SSA has been stewardship issues of the SSI program. Stewardship issues for SSA involve debt management and preventing false and improper payments of the SSI program (SSA, 2005). The amounts of overpayments and financial performance of the SSI program according to SSA (2006a) must be reported annually to congress and other oversight authorities to stay in compliance with the Office of Management and Budget (OMB) guidelines from the provisions of the Improper Payment Information Act of 2002. The results of the reviews (SSA, 2006a) assist in planning corrective action and program performance monitoring activities as required by the Government Performance and Results Act of 1993.

The reviews or procedures used to correct and monitor participant reporting behaviors that this study was concerned with are the age 18 disability redeterminations and nondisability redeterminations. In 1996, Congress issued orders (P.L. 104-193) to compound the child disability guidelines (Policy Net-POMS, 2000a). Congress had concerns over the growth and media coverage reports about children being manipulated so they could qualify for SSI payments (SSAB, 2006). Congress included a requirement for all 18 years old recipients to be redetermined for disability eligibility. (SSAB) reported that the guideline required 18 year old recipients to be redetermined based on adult disability guidelines instead of childhood disability guidelines.

In 1996 through 2004, 400,000 18 year olds redeterminations were performed. The decision to continue payments, of those approved was 56 %. Those that resulted in denials were 44 % (SSAB, 2006). Representative payees (parents) could request reconsideration of the decision if they were denied and they could elect to have payments continued. If they were denied at the reconsideration level, they could request a hearing. If they were denied at the hearing level, they could request a review by the Appeal Council review board. After that, they could appeal in the Federal courts (SSAB). Of the 1996 through 2004 recipients that were reviewed and went through the appeal process, (SSAB) 65 % were approved and 33 % were not. (SSAB) reported parents usually elect continuation of payments and discourage their child from work activities due to their fear of sudden lost of income and health insurance

SSAB (2006) reported that the payments received during the appeals process of denied 18 year olds are considered overpayments and must be paid back to SSA. (SSAB) found that since 1996, SSI records have shown a third of the 18 year olds were denied continuation of SSI payments because they were determined not to have a disability that caused them not to work, 22 % became full time workers and 15 % worked part time. (SSAB) Conclusions of the study reported that there is a waste of youths at an early age and waste of a national asset.

Nonmedical redeterminations are reviews required for factors of income, resources, and living arrangements changes that affect eligibility and payment levels. Nonmedical redeterminations can occur as scheduled or unscheduled processes (SSI Report, 2007). Institutionalized recipients are not scheduled, but may require review every 6 years on an as need basis. Scheduled redeterminations are made on a yearly basis.

SSA schedules nonmedical redeterminations for cases that are most likely to have errors in payment due to changes in circumstances of income, resources, and living arrangements (SSI Report). If parents of disabled children do not report changes in income, resources, or living arrangements prior to or during a nonmedical redetermination, overpayments occur and the child could be held responsible for repayment. SSA (2007b) reported that the only way a representative payee may be held liable for the overpayment is if the payments can be determined not to have been used for the child's welfare.

The 18 year old and nonmedical redeterminations are used as integrity and payment accuracy reviews. However, the SSI program has limited resources and budget restrictions for integrity and payment accuracy reviews (SSA, 2007c). The processes of redetermination also helps to determine if the recipient is alive and if there has been any work activity from the recipient (SSA, 2006b). How redeterminations reflect integrity is determined by processes that limit or control behavior that cause overpayments caused by fraud, abuse, or mismanagement. GAO (1997a) reported improved performance in the areas of fraud, abuse, and mismanagement improves public confidence towards the Federal government usage of taxpayer's money.

In order to perform nonmedical reviews there must be employees and management in SSA field offices. Managers of the SSI program have expressed concerns about the quality of nonmedical work loads performed in field offices. They complained about pressures from high volume workloads and the lack of management in field offices to ensure that proper time and care is given to the quality of reviews (SSAB, 2003).

Because of funding restraints, decreases in the level of employees, and increases in other workloads, redeterminations have not been performed as required by law (GAO, 1997a). The management of SSA is also faced with challenges that pertain to their workforce. SSA (2007d) found that diversity issues, leadership development, retirement of employees have a major impact on services provided by the SSI program.

SSA management acknowledged that to do the required workloads properly it has to rely on technology and increase the level of employees that demonstrate flexibility and intelligence to meet the demands of changing environments (GAO, 1996). To help in the process of discovering information that is not reported by participants, (GAO, 1998a) reported that computer matching with other federal and state organizations and computer software implementation allow SSA to uncover and verify important information.

For the SSI program, SSA is allowed to share information with the Office of Child Support Enforcement (OCSE) to find data on recently hired recipients, the wages they earn, and unemployment payments. Employees can access the SSA Access to State Online (SASRO) software to verify State administered payments (SSA, 2007d). Data matches for the SSI program is not always effective with verifying information. (GAO, 1998a) found that information received is sometimes over a year old and by that time overpayments have accrued on recipients records.

Some technological applications have been introduced as tools for management for computer system operations to detect and collect overpayment (SSA, 2006a). In 1999, The Foster Care Independence Act (FCIA) authorized by the Debt Collection Improvement Act (DCIA) initiated an external debt collection tool called the Treasury Offset Program (TRO) for SSI program (SSA). The different types of redeterminations



and computer software applications are tools for management of the SSI program.

Mamaghani (2006) management tools are components of organizational systems that incorporate procedures and technology to improve organizational performance.

#### Purpose of the Study

The purpose of this study was to examine how well management of SSA and the SSI program has responded to the concerns of congress and other oversight authorities. Examination of some management practices developed or implemented over the past 8 years (1998 through 2005) that address the problem of noncompliance of participants with reporting changes in income, resources, and living arrangements that result in overpayments and integrity issues for the SSI program were of concern. This study examined processes and procedures that were implemented to address the overpayment dilemma of the SSI program and the effectiveness of those processes and procedures for improvement in the payment accuracy of SSI claims.

#### Nature of the Study

The organizational setting for this study was the SSA with special interest in its administration of the SSI program. Qualitative methodology using the case study approach was utilized. According to Yin (2003) the case study approach is used often in areas of public administration, public policy, and management science. These areas of usage are considered practice oriented disciplines that involve social science research. The case study approach is also used often in dissertation research in all of these areas.

The case study approach was appropriate for this study for several reasons. SSA is a Federal agency and in many cases it is difficult to receive permission for primary data research. "U.S. federal agencies have made surveys and questionnaires a bureaucratically

hazardous affair due to the clearance procedures required” (Yin, 2003, p. xiii). Case studies can offer understanding of organizational practices and policy issues and insights into those issues for further research (Merriam, 1998). A case study can explain a bounded system with time frames and describe the case in different contexts (Creswell, 1998). The case for this study was the SSI program bounded in time (1998 to 2005).

The case study approach was chosen because it is different from other qualitative research methods (ethnography, phenomenology, field research, or grounded theory) in that it can describe complicated views and processes of a program (Merriam, 1998). Another reason why the case study approach was appropriate for this study is that the true purpose of all case studies is that they try to highlight a decision or set of decisions as to why the decisions were taken, how the decisions were implemented, and what resulted from the decision(s) made (Schramm as quoted in Yin, 2003, p. 12).

Data were gathered from secondary sources, for example, audit reports, congressional and other oversight agencies reports, and SSA correspondence to congressional inquiries, financial, and performance reports that pertain to the SSI program. The data was obtained by accessing and utilizing the Internet. Secondary analysis of information from multiple sources was used to examine the research questions. Time series analysis was used to classify and study patterns of overpayment amounts, program’s participation levels, technological implementation dates, and work processes implementation dates to examine their impact on the detection and recovery of overpayments for the SSI program. Time series analysis aids in determining if management decisions toward controlling overpayments are reasonably correct and are

having a positive affect towards reporting behaviors of participants and integrity issues of the SSI program.

### Research Questions

This study was concerned with how management practices have changed to improve/ensure compliance with reporting requirements of change in income, resources, and living arrangements from participants of the SSI program that have been designed to lessen overpayment amounts and improve the integrity of the program. Questions for this study were:

1. What were the SSI overpayment amounts and trend from 1998 through 2005?
2. What technological innovations were developed to detect overpayments during the same time period and how have they improved debt collection?
3. How has workflow processes or procedures, performed by employees, addressed the feedback in the form of overpayments from SSI disability claims processing?
4. How has participation levels changed from 1998 through 2005 and how has this impacted management practices?
5. How have changes in management practices resulted in improved accuracy of payment for SSI disability claims?

### Theoretical or Conceptual Support for the Study

SSA is an open system organization and the administration of SSA use an open systems approach to management that is based on general systems theory. von Bertalanffy (1950) is recognized as the founder of general systems theory (Berrien, 1968). The primary focus of the theory is to recognize an entity as a system (Berrien).

“Incorporation of information from several different disciplines makes it possible to understand the full system operations” (Bertalanffy as quoted in Certo, 2000, p. 37).

There are two basic types of systems: closed and open. Closed systems have no involvement with the environment. Open systems are constantly involved with the environment (Certo, 2000). SSA has constant interaction or involvement with the governmental, sociocultural, technological sectors of the environment.

Regulations, laws, and politics are involved with the government sector (Daft, 1989). For example, initiatives from the executive branch of government found in the National Performance Review (1993) and the legislative branch of government found in the Government Performance and Results Act (1993) charge Federal managers to pay attention to program results instead of processes as they manage public programs. Emphasis is placed on program examination and accountability measures. Newcomer (1998) SSA is a federal organization that administers federal programs (SSI) and management must adhere to the guidelines established by the President and Congress.

The sociocultural sector of the environment deals with the demographic components and value appropriations of society (Daft, 1998). Some examples of sociocultural concerns for the SSI program are age of recipients and income distribution of recipients. The technological sector involves computer usage and production mechanisms techniques (Daft). An example of how technology is used in federal organizations is listed, SSA (2004) as an initiative in the President Management Agenda (PMA). The initiative is a way of ensuring annual investments in computer technology.

A system and its environment are described by Harmon and Mayer (1986) as:

Inputs, throughputs, and outputs...[inputs] the energy and resources

imported into the system from its environment, [throughputs] the transformation or processing of the energy and resources within the system, and the [outputs] export of the transformed inputs back into the environment (p. 164).

For management of open systems organizations to comprehend the effectiveness of systems operations, feedback from the environment is used as a sign to adjust input process (Harmon & Mayer).

SSA inputs human, material capital, and financial resources from the environment. The PMA lists Strategic Management of Human Capital as one of the five key government initiatives. The initiative states, “having processes in place to ensure the right person is in the right job, at the right time, and who is not only performing, but performing well” (SSA, 2004, p. 46). Inputs are of two kinds, maintenance and signal. Berrien (1968) stated that maintenance inputs give the system energy to make it operational. Signal inputs provide data for processing within the system.

The SSI employees perform work processes to produce payments to disabled people. Production of an organization shows ability to supply what society needs. The measures of production for the SSI program are information processed and clients served. The quality and quantity of the finished product (payment of claims) represent output for SSA (Donnelly, Gibson, & Ivancevich, 1976). The processes of work have always and will remain a lasting problem for organizations. Sinha and Van de Ven (2005) reported the order and procedures of work processes are vital for the system. Every day the work processes affects performance and economic issues, describe organizational theories and activities, and the work processes continue to change.

The use of technology, as reported by SSA (2000b), has affected the way SSA service the public and how work processes of the SSI program are performed and completed. SSA has invested a considerable amount of time and money in providing the resources necessary to meet the challenges the agency face with the workloads and its workforce. (SSA) from the years 1993 through 2000 there was a demand for technological tools to enhance employee performance and achievement of goals and objectives.

SSA (2000b) stated that computers are placed on each employee's desk to allow employees the access to information that is needed to perform their job. Automation makes information readily available in electronic form and decreases the need for paper. (SSA) investments in technology also enhance communication of management information, obtaining information from other government agencies, and improve work processes of employees across the country.

SSA is the suprasystem for the SSI program. Suprasystems evolve out of their subsystems and become dependent on subsystem' output (Berrien, 1968). They gradually gain control over subsystems by specialization of structure and function in subsystems by reason of growth requirement. A subsystem performs processes that results in particular outputs that contribute to the larger system (Berrien). The output of a subsystem, according to Berrien (1968):

Are those energies, information, or products that the components discharge from the system into the suprasystem....The output must be useful to the suprasystem....Each system must, if it is to survive, deliver products that are acceptable to its environment. If the products are unacceptable, either the producing system itself takes on a different state...or the environment operates in such a fashion that the system is destroyed. (pp. 27, 28)

The primary purpose of an organization is to produce quality outputs for people or the environment (Swanson, 1994). The output goal of the SSI program is centered on the accuracy of payments made to disable people.

A ramification of systems theory is that systems operations must be flexible to changing environments (Berrien, 1968). The congressional inquires, other oversight authority inquires, and audit reports of SSA about the SSI program operations are forms of feedback from systems operations. SSA (1998) reported:

The Government Performance and Results Act (GPRA) of 1993 requires agencies to develop and institutionalize processes to plan for and measure mission performance in basic management cycle. Planning, execution, and measurement are integral parts of the traditional management feedback loop. GPRA defines specific efforts, at the highest level, that Federal agencies must undertake to address this measurement process. (p. 60)

Overpayments from the SSI program are a form of feedback for management of SSA and the SSI program to make decisions towards organizational learning. Malhotra (1996) concluded that, “an entity learns if, through its processing of information, the range of its potential behaviors is changed” (p. 2).

Open systems organizations have a natural tendency to move towards destruction or nonexistence. The process is defined as entropy (Harmon & Mayer, 1986). When the SSI program was designated as a high risk program in 1997, an assumption can be made that the SSI program was moving towards entropy. Hodgets (1989) open systems must be able to adapt to changing environments during its operation.

Another system's concept that is applicable to management of SSA and the SSI program is adaptation. When management of an organization adjusts or change practices, policies, inputs, and/or outputs due to change in the environments (internal, external) the

process represent its adaptiveness. Organizations that do not adapt to change in the environment may cause their systems operation to fail (Donnelly et al., 1976). Mantell (1972) reported that managers who implement the systems concept are adaptive planners. They realize the contrast between real and perceived notions of systems theory. Management wants to understand subsystems components of the larger organization to make proper adjustments in response to environmental changes.

To promote a more efficient Federal government, Congress have made some strides by creating the Chief Financial Officers Act of 1990 (CFO), The Government Performance and Results Act of 1993 (GPRA), the Government Management Reform Act of 1994 (GMRA), and the National Performance Review (NPR). SSA (1996) stated that the aims of these Acts and the Review are to express to management of federal organizations to manage for results and accountability. SSA has made it a priority to implement the Acts intentions.

#### *Feedback from Program Operations*

Feedback is a major function of systems theory. Information from systems operation is sent back to the input function of the system. A ramification of feedback is that systems must be flexible to changing environments while staying in operation (Berrien, 1968). The congressional inquires, other oversight authority inquires, and audit reports of SSA about the SSI program operations are forms of feedback. SSA (1998) reported:

The Government Performance and Results Act (GPRA) of 1993 requires agencies to develop and institutionalize processes to plan for and measure mission performance in basic management cycle. Planning, execution, and measurement are integral parts of the traditional management feedback loop. GPRA defines specific efforts, at the highest level, that Federal agencies



must undertake to address this measurement process. (p. 60)

Overpayments from the SSI program is a form of feedback for management of SSA and the SSI program to make decisions for systems survival and in turn the SSI program.

### *Feedback for Organizational Learning*

Organizational learning is defined, “as the ability of an organization to gain insight and understanding from experience through experimentation, observation, analysis, and willingness to examine both successes and failures” (Malhotra, 1996, p. 1). The theoretical foundation of organizational learning is systems theory (Mirvis, 1996). A function of organizational learning that is applicable to this study is single loop feedback. Loverde (2005) explained that, “a loop is knowledge of results that guides activity” (p. 30). It is reported that, “all learning depends on feedback....The engineering concept of feedback applied not only to servo-mechanisms but also to human decision-making and social settings....All decisions (including learning) take place in the context of feedback loops” (Sterman, 2000, p. 25).

With single loop learning it is important that the organization has been established and the general view of management towards learning is focused on how to meet current goals within an established organizational culture (Loverde, 2005). The single feedback loop for organizational learning, according to Sterman (2000) is:

Classical negative feedback whereby decision makers compare information about the state of the real world to various goals, perceive discrepancies between desired and actual states, and take action that (they believe) will cause the real world to move towards the desired state. (p. 25)

Management of SSA and the SSI program have learned that SSI participants do work and can own resources that affect payment amounts from feedback information. Malhotra

(1996) stated, “an entity learns if, through its processing of information, the range of its potential behavior is changed.” (p. 2)

### Assumptions

Assumptions for this research effort were as follows:

1. Overpayments are indicators of improper payment of SSI claims to recipients.
2. Improper payments are indicators of feedback control problems.
3. The use of feedback is a valuable tool for organizational learning.
4. The more management of Federal organizations considers feedback from program operation, learns from the feedback, and implements change accordingly, the higher the chance of survival.

### Limitation

Sources of data for this study were limited to SSI program records and previous studies of program performance by oversight authorities. Permission was not granted for research activities to obtain primary data from management, staff, or recipients of the SSI program (see appendices A - C). There are some limitations of using secondary data. Zikmund (1994) stated that researchers may find that the data were not designed specifically for their needs, the information may become outdated rather quickly, concepts used may be defined by the researcher, the format of reported data may be different for the researcher’s purpose, and accuracy of the data is not under the control of the researcher.

Data for this study are from federal government records and publications. Program records include congressional inquiry reports, SSA responses to those inquiry reports, and financial and performance records of the SSI program. The SSI program is

the only cash transfer program under examination for this study. The study is bounded in the time frame of 1998 through 2005.

### Definitions of Terms

The definitions of terms are applicable to this study of the SSI program and of SSA as a social insurance organization.

*Boundary of a system.* “Is that region separating one system from another whose function is to filter or select inputs and outputs. It can be distinguished by some difference in the relationships existing among the components within the boundary compared with relationships which occur across the boundary” (Berrien, 1968, p. 32).

*Deemed Income.* Portions of parental income and/or resources that is allocated to a child (SSA, 2007a).

*Disabled Child.* People under age 18 that have a physical or mental medically determinable condition that results in noticeable or serious functional limitations that is expected to last a year or more or results in death (The House Committee on Ways and Means [HCWM], 2003).

*Feedback.* Is a tool that controls output by sending messages for input adjustment or for change. Its consequences can keep a relatively steady state of system operation regardless of external conditions that would cause it to change (Berrien, 1968).

*Fraud.* An intentional act to deceive (SSA, 2000c).

*Improper Payments.* Payments that are made in error or that was made in an incorrect amount (SSA, 2006a).

*Integrity.* Paying the correct amount of benefits to the right recipients at the right time (SSA, 2007c).

*Overpayments.* The amount of money a recipient receives in any given month that is more than they should have received (SSA, 2007a).

*Subsystems.* Processes and procedures result in particular outputs that contribute to the larger system (Berrien, 1968).

*Suprasystems.* They evolve out of their subsystems and become dependent on subsystem's output. They gradually gain control over subsystems by specialization of structure and function in subsystems by reason of growth requirement (Berrien, 1968).

*Systems.* "Is a set of components, interacting with each other, and a boundary which selects both the kind and rate of flow of inputs and outputs to and from the system" (Berrien, 1968, p. 32).

#### Scope and Delimitations

This study was concerned with management practices of the SSI program. The practices have focused on the areas of payment accuracy review procedures and processes and integrity procedures and process reviews. Noncompliance behaviors of participants towards reporting changes in income, resources, and living arrangements pertain to payment accuracy concerns (SSA, 2006a). These three areas are reported as the three main causes of overpayments for the SSI program (SSA). Changes in medical conditions pertain to integrity reviews (SSA). These procedures and processes help management to detect improper payments and have a major impact towards the SSI program system operations (SSA). SSA (2006c) reported that technology is also used by management of SSI program to obtain information from outside sources, overpayment control, data accounting and recovery entries on SSI recipient's records, and consistency of debt management of recipients receiving SSI payments.

### Significance of the Study

This study was significant because it examined a gap in the literature that pertains to participant (parental) responsibility of social service programs. Most studies concentrate on organizational behavior towards participants. In the SSI program, participant's reporting behavior affects payment accuracy of claims and it affects the future generations of disabled people. As the population of disabled people continue to exist and increase, it is important for organizations to adapt and learn from experience. In order for social welfare programs to survive, individual behaviors must conform to the rules and regulations of that system (Harmon & Mayer, 1986). The SSI program is one of the largest federal programs that offer assistance to people with disability (GAO, 1997b). The continuation of the program is vital for the low income disabled people in the United States. It is important that assistance be available for them. The SSI program is faced with challenges that warrant management to seek and implement changes that are ethically sound for future generations. The examination of management practices toward addressing those challenges can offer insight for future management and researchers for a program that is instrumental and mandated by law to assist disabled people in the United States of America.

### Summary

The SSI program was created in part to assist parents with disabled children. Management practices that ensure timely reporting of changes in income, resources, and living arrangements can have a positive effect on integrity issues and the survival of a program that benefits society as a whole. Each disabled child born represent challenges and responsibility for parents and members of society. Disabled children become adults

and have to experiences a transitional phase to adulthood. Their disability can cause some problems in that transition. They do not need financial problems as well, especially if they did not create them. Gordon and Milakovich (2001) remarked that the SSI program was enacted to satisfy the Federal government responsibility to ensure social insurance for the disabled people of the United States. “Government has also been asked to alleviate various kinds of human distress—through Supplemental Security Income payments....Rules and regulations accompany basic legislation to make it possible to administer such programs fairly and equitably” (Gordon & Milakovich, 2001, p. 441). Management of SSA and the SSI program have created and implemented strategies in response to the concerns from the environment.

When parents apply for SSI on behalf of a disabled child, it is usually because they need financial assistance and the SSI program is the last resort (GAO, 1995). Family income is usually limited and in some cases the parents are disabled themselves (GAO). Reporting changes in their income, resources, and living arrangements may be the least of their concern. Bobis, Field, and Msall (2006) found that low income people have major concerns with housing, food, and healthcare on a daily basis. In addition, having a disabled child or children can cause hardship for parents that have other things to do.

Some examples of healthcare hardships are reported by Bobis et al. (2006):

Childhood disability has been estimated to result in 66 million days of restricted activity, 24 million days lost from school, 5 million days spent in the hospital, and 26 million physicians contacts annually...its impact on children and their development, education, healthcare needs, and family is clearly profound. (p. 2)

Chapter 2, Literature Review, the SSI program and its entitlements for minor children are described. The deeming process is further explored. A description of both types of redetermination processes is explained. Management assurance policies of SSA were explored. Some codes of federal regulations that are for representative payees of minor children and 18 year olds are described. Some technological innovations as they pertain to SSI program detection and recovery of overpayments were examined. Workforce challenges and integrity issues of the SSI program were explored. The theoretical basis for this study was described.

Chapter 3, Research Methodology, a description of the research approach chosen to examine the problem of improper payments that results in overpayments for the SSI program and integrity issues are presented. An analysis was performed by comparing overpayment levels and dates to some of the procedures and technological applications management of SSA has implemented to improve the detection and recovery of overpayments and improve integrity issues of the SSI program. The qualitative methodology using the case study approach was described. The benefits of using existing records for secondary data in a case study are presented. Time series analysis was defined and the benefits of using time series analysis were listed. Validity and reliability issues were addressed.

Chapter 4, Findings of the Study, reviewed dissemination of information from federal agencies and some technological applications used to administer the SSI program. SSA management reporting requirements to Congress and the public are described. The responses to the research questions and the interpretations from research are reported.

Chapter 5, Summary, Conclusions, Implications, and Recommendations, presented the answers to the research questions. A comparison of SSI processes and procedures to the homeostasis equilibrium mechanisms of systems theory is performed. The social change ramifications and the recommendations for further study and action were reviewed.



## CHAPTER 2: LITERATURE REVIEW

### Introduction

The content of this chapter has examined and described some of the policies, procedures, and technology innovations to improve the administration of the SSI program. The sections on program entitlement and the deeming process describe minor children policy for the SSI program. The sections on the redeterminations describe procedures of the SSI program that govern eligibility and payment accuracy of claims. The sections on the representative payee program and management assurance examine duty guidelines for the administration of the SSI program. The section on other views report on studies and reports performed on the SSI program. Technology applications are described in another section. The sections on workforce challenges and integrity issues examine some environmental concerns of the SSI program as an open system. The reasons why the case study approach was chosen as opposed the other qualitative approaches are also explained.

The strategy used for searching for data and information for this study involved accessing data through the SocIndex with Full Text, Business Source Premier, and Academic Search Premier from Walden's library databases. Key words and phrases, such as, *social service programs, low income people, disabled people, fraud, and abuse* were used. The internet was also accessed using key words and phrases like the *SSI program, disability, minor children, eligibility, fraud, abuse, overpayments, and technology*. The search engine <http://www.google.com> was accessed using questions pertaining to studies and reports that presented research on the SSI program.

### The Birth of the SSI Program

The SSI program provides cash payments to low income aged, blind, and disabled people in the United States. Prior to the establishment of the SSI program in 1972, individual States and local governments were responsible for the low income aged, blind, and disabled people that needed cash assistance (Kennedy, 1999). The three means tested programs that were administered by state and local governments and replaced by the SSI program, were the Old Age Assistance (OAA), Aid to the Blind (AB), and Aid to Permanently and Total Disabled (APTD) (Kennedy). Congress also included low income children under the age of 18 as eligible individuals for the SSI program (Kennedy). The Aid to Families with Dependent Children (AFDC) program offered payment for children as a component of a low income family unit (Kennedy). One of the main changes from AFDC to the SSI program was that children could receive payments for their individual blind and disabled status and not because of family membership (Kennedy).

The SSI program is a Federal program administered by the SSA. Kennedy (1999) stated that congressional concerns of creating a national program for low income aged, blind, and disabled people center around standard minimum payment levels and general eligibility requirements were two of the main goals. (Kennedy) reported one reason why SSA was chosen to administer the SSI program was because of its field offices locations all over the country.

The initial rules and regulations mandated by congress for minor children participation in the SSI program stipulated that minor children should be considered based on guidelines similar to adults (Perrin & Stein, 1991). There were some issues about comparing childhood disability to that of an adult because the adult standards were

based on their ability to work (Perrin & Stein). In the mid 1970's criteria that determined childhood disability and eligibility for the SSI program were developed by SSA. The eligibility and disability requirements were made available to the public in 1977 (Perrin & Stein).

#### SSI Program Entitlements for Minor Children

Qualifications for children for the SSI program required the child to be under the age of 18 or a full time student under the age of 22, not married, and met the requirements of disability, income, resources, citizenship, and residency (HCWM, 2003). Payments started in 1974 for the SSI program (HCWM). The disability determination process for minor children at that time, involved the comparison of conditions of a child to a listing of adult and childhood impairments.

Ford and Schwamm (1992) reported the impairments had to match or at least equal the adult or childhood listings for a favorable decision. If there were no comparison or match to the impairment lists, the child was found not entitled to disability payments from the SSI program. This process was determined to be invalid because there was no step for children in the determination process after comparing conditions to impairment lists (Ford & Schwamm). The adult determination process used vocational assessments if no match or comparison was found to impairment lists. There were no assessments criteria for children (Ford & Schwamm). Several thousands of low income children were denied payments based on this determination process (Ford & Schwamm).

SSA has used the Listing of Impairments since the SSI program began to verify disability conditions in a timely fashion for adults and children (Ebling, Elgen, Green, & Lefko, 2006). The listing describes physical and mental impairments, evaluation criteria,

and it is found in the Social Security regulations (Ebling et al., 2006). If an individual condition meets or match the evaluation criteria they would automatically be eligible for SSI payments (Ebling et al.). Arrangements of the conditions on the listing are by body systems. For example, respiratory, musculoskeletal, and cardiovascular body systems. Severity and diagnostic levels are also included on the listing (Ebling et al.).

For the determination of childhood disability the process ended with the impairment list. Ebling et al., (2006) reported that for adults there is another way. Consideration of age, education, and work experience based on functional activity caused by medical conditions is the other way an adult could be found disabled. SSA updates to the listings dates back to the 1980s. Updates needed to be performed because of medical advances (Ebling et al.). Another concern for SSA was to make sure all adjudicators understood and applied the listing uniformly to make disability decisions. In 2004, SSA published final rules on how to use the listing for disability decisions and updates for some body systems (Ebling et al.).

The U. S. Supreme Court, on February 20, 1990, made a landmark decision that changed the disability determination process for children. The case that caused the change was by Zebley. The class action suit started in Pennsylvania on behalf of Zebley, two other plaintiffs, and all individuals that has or will engage in the disability process for childhood disability determination (Ford & Schwamm, 1992). Zebley had cerebral palsy, developmental delay, and speech and hearing problems. Individually, those conditions did not match or equal the lists of impairments. Perrin and Stein (1991) reported that he was denied SSI payments. He would have been considered very disabled had clinicians viewed his case and considered all of his conditions as one.

The precedent court decision is referred to as the Sullivan v. Zebley case. In a 7-2 decision rendered by the U. S. Supreme Court it was found that the childhood disability determination process was not in line with congressional intent (Ford & Schwamm, 1992). According to Ford and Schwamm (1992), the court found:

The fact that vocational analysis is inapplicable to children does not mean that a functional analysis cannot be applied to them. An inquiry into the impact of an impairment on the normal daily activities of a child of the claimant's age—speaking, walking, washing, dressing, and feeding oneself, going to school, playing, etc. is, in our view, no more amorphous or unmanageable than an inquiry into the impact of an adult's impairment on his ability to perform any other kind of substantial gainful work which exists in the national economy. (p. 3)

The U.S. Supreme Court went further to declare that the lists used for the disability determination process for children were not exhaustive and that they listed impairments that were common among children and not uncommon impairments (Ford & Schwamm, 1992). For example, spina bifida, downs syndrome, and muscular dystrophy were some uncommon conditions for children at that time. According to (Ford & Schwamm) the court also noted that if disability determinations were performed on 18 year olds for those conditions, they would be found disabled for SSI payments.

SSA response to the court decision was to appoint experts in child development and disability impairments for the development of disability criteria based on functional assessment of children (Ford & Schwamm, 1992). The experts engaged in the evaluation of development or functioning capacities of children from infancy to adulthood. The evaluations covered areas of cognitive, communicative, motor, social, and personal/behavioral activities of children. These findings or regulations became part of the disability determination process for children and were effective as of year 1991 (Ford

& Schwamm, 1992). In 1996, (HCWM, 2003) found Public Law 104-193 under the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) declared a different definition for childhood disability. (HCWM) reported minor children must have a physical or mental impairment that affects functional ability and cause limitations that will be expected to last a year or more or results in death.

Financial and resource eligibility for a minor child living in the same household with a parent is based on a complicated formula. (Bobis et al., 2006) reported that SSI payments depends on how many parents are in the household and how much earned, unearned, and resources the parents has. For example, (Bobis et al.) concluded that a single parent with one disabled child should gross less than \$2333 of earned income a month and have resources less than \$2000. A parent can own a car and a residence as resources and still qualify for SSI payments for a disabled child.

For SSI purposes, the process that allocates parental income and resources is called deeming (SSA, 2007a). A child must be under the age of 18, unmarried, and lives with the parent(s) for the deeming rules to apply. Deductions are made on parent(s) and ineligible children behalf in the household. The remaining amount, after subtracting the deductions, is used to determine if the disabled child qualify for SSI payments and the amount of payment (SSA). More details on income and resource allocation of parent to child deeming will be discussed further later in this study.

The process of determining eligibility for the SSI program involves the determination of physical and/or mental impairments, the severity of those impairments, and the amount of income and resources for the household (SSA, 2007a). Figure 1

demonstrates a simplified version of the process for determining SSI eligibility and payment amounts.

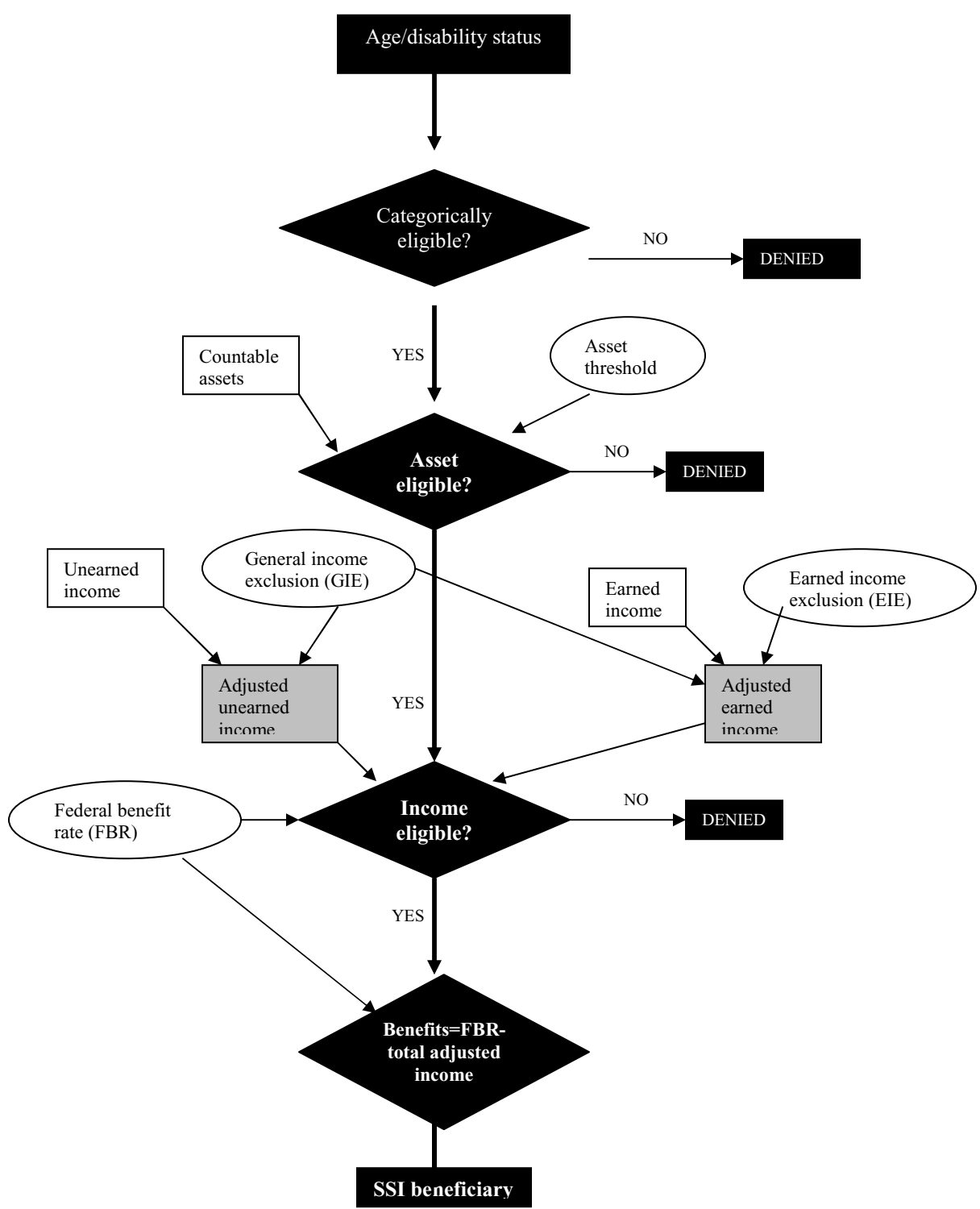


Figure 1. Simplified Rules for Determining SSI Eligibility and Benefit Amount. Social Security Bulletin, 64 (2), p. 18.



The citizenship and residency eligibility for minor children are: (a) A citizen of the United States or obtained citizenship by naturalization. (b) Have permission from the Immigration and Naturalization Service to stay in the United States. (c) Reside in the United States or the Northern Mariana Islands. (d) Children that have parents in military forces that are station overseas. Excluded are citizens of the U. S. that live in Puerto Rico, Guam, United States' Virgin Island do not qualify for residency reasons (Committee on en with Disabilities, 2001).

#### SSI Parent to Child Deeming

A portion of a parent's income and resources may be deemed to a disabled child that lives in the same household of the parent or the child is away at school and returns home for holidays, weekends, or summer vacations from school and is under the parents control (SSA, 2007a). There is no limit on the amount of parental income but, there is a limit of deemed income for the child to be eligible for SSI payments (SSA). The deemed income (Hannsgen & Sandell, 1996) is considered the child's personal income for SSI payment calculations. Excluded income of a parent involves payments from public assistance programs and income received from the SSI program on the parent's own behalf (Hannsgen & Sandell).

In 1992, there was a deeming rule change that affected the amount of deemed income for children of the SSI program (Hannsgen & Sandell, 1996). The new deeming rule increased payment amounts for children and also increased the number of children that became eligible for SSI payments. Prior to the deeming changes in 1992, complaints from legal representative of disabled people and employees of the SSI program were received by SSA. In 1984, a parent took Health and Human Services to court because of

income reduction for having another child. The case was titled *David Parker Secretary*. A district federal court in Massachusetts, “found that the deeming formula bore no rational relationship to the manifest purpose for which the deeming statute was enacted” (Hannsgen & Sandell, 1996, p. 44).

The formula for deeming parental income for a child monthly payment amount can be found in the Social Security Act (Section 1614(f) (2)). It was changed because the old deeming rules caused problems in some situations. The change was reflected in the last step of the computation. The last step involved earned and unearned income.

According to Hannsgen and Sandell (1996):

Any remaining earned income was sometimes divided by two. This final step was applicable only if both earned income and unearned income remained after the initial set of deductions. Thus, having a small amount of earned income could actually help a family get a higher SSI check by allowing them to reduce their deemed earnings in half. Any unearned income could increase the SSI payment amount. (p. 44)

(Hannsgen & Sandell) stated that changes with the new deeming rules for the last step in the computation reduced the three columns on the old form to one column on the new form and if there were any income remaining after deductions it was divided by two even if no unearned income remained.

There are break even points that determine if parental monthly income will allow a child to receive payments from the SSI program. If parental income matches exactly to the break even points, no income is due to the child. If the income is less than the break even points the child will be due payments from the SSI program (Golden & Sheldon, 2003). The table below show different family sizes and various amounts of parental income and break even points. The table is applicable if there is one eligible disabled

child in the household. The remaining children (if any) are ineligible and have no countable income and the parent(s) has either earned or unearned income (Policy Net, 2006). The reporting behavior of parents should be regular. Reporting changes in income, resources, and living arrangements within 10 days of the change is necessary for the correct assessment of minor children monthly payment amount for the SSI program.

Table 1

*Parent to Child Deeming Break Even Points (1 Parent)*


---

Parent to Child Deeming (1 Parent)				
Number of Ineligible Children	Earned Income 1 Parent		Unearned Income 1 Parent	
	Reduction Begins	Eligibility Cease	Reduction Begins	Eligibility Cease
0	1,331.00	2,581.00	643	1,268.00
1	1,632.00	2,882.00	944	1,569.00
2	1,933.00	3,183.00	1,245.00	1,870.00
3	2,234.00	3,484.00	1,546.00	2,171.00
4	2,535.00	3,785.00	1,847.00	2,472.00
5	2,836.00	4,086.00	2,148.00	2,773.00
6	3,137.00	4,387.00	2,449.00	3,074.00

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Table 2

*Parent to Child Deeming Break Even Points (2 Parents)*


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Parent to Child Deeming (2 Parents)				
Number of Ineligible Children	Earned Income 2 Parent		Unearned Income 2 Parent	
	Reduction Begins	Eligibility Cease	Reduction Begins	Eligibility Cease
0	1,933.02	3,183.00	944	1,569.00
1	2,234.02	3,484.00	1,245.00	1,870.00
2	2,535.02	3,785.00	1,546.00	2,171.00
3	2,836.02	4,086.00	1,847.00	2,472.00
4	3,137.02	4,387.00	2,148.00	2,773.00
5	3,438.02	4,688.00	2,449.00	3,074.00
6	3,739.02	4,989.00	2,750.00	3,375.00

---

### Redetermination Processes

There are two redetermination processes used for the SSI program. SSA (2007a) one redetermination process (nonmedical) involves the review of income, resources, and living arrangement to determine continued eligibility and correct payment amounts. The other process involves a disability redetermination (medical) of 18 year olds.

Redetermination can occur by telephone, in field offices, or by mail (SSA). SSA (2005b) found that both forms of redeterminations are used for finding and stopping overpayment for the SSI program.

SSA performs periodic computer interfacing with federal and state agencies to discover any changes in income and resources for SSI recipients. (SSA, 2007e) nonmedical redeterminations are triggered by posting indicators on recipient's records. The indicators are called limited issues. Once the limited issue is recognized scheduled nonmedical redeterminations can take place. Each year SSA schedules redeterminations for cases that have or more than likely have payment errors at least once every 6 years (SSA). Some times participants will walk into offices to report changes in income and resources. Those redeterminations are considered unscheduled (SSA). Administrative budgetary limitations may determine the amount of nonmedical redeterminations performed and other workload requirements. (SSA) reported if nonmedical redetermination are not completed in a given year, they are completed the in the next year.

Frequently overpayments are created when nonmedical redeterminations are performed. One of the main reasons nonmedical redeterminations are performed is to detect inaccuracy of payments. Another reason for nonmedical redetermination is that it

is a tool or strategy to improve reporting behaviors (SSAB, 2002). Results of nonmedical redeterminations show that changes in wages (income) were the number one cause of overpayments for the SSI program. Financial accounts (resources) were second, and unreported changes in living arrangements are third for improper payments (SSAB). In some cases the nonreporting of child support payments uncovers fraud. (SSAB) reported requiring and performing nonmedical redeterminations is one of the main strategies to detect and stop overpayments.

The age 18 disability redeterminations reviews are mandated by the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996. The changes to the SSI program affected all minor children that applied for SSI payments on or after August 22, 1996, minor children claims that are adjudicated on or after August 22, 1996, and many current (Policy Net, 2000b). How the redetermination affected recipients of the SSI program is that 18 years old recipients must have a review on their disability condition within 1 year after age 18 and it must be based on adult criteria (Policy Net). As minor children, the disability criteria used was for minor children. Because of the adult criteria many young adults lost their eligibility for the SSI program (Policy Net). The National Council on Disability in 1997 reported that of the 62,000 age 18 redeterminations performed, 56% were referred for cancellation over the country (Auxter, 1999). Figure 2 illustrates the redetermination process of 18 year olds (Childhood Disability Redeterminations).

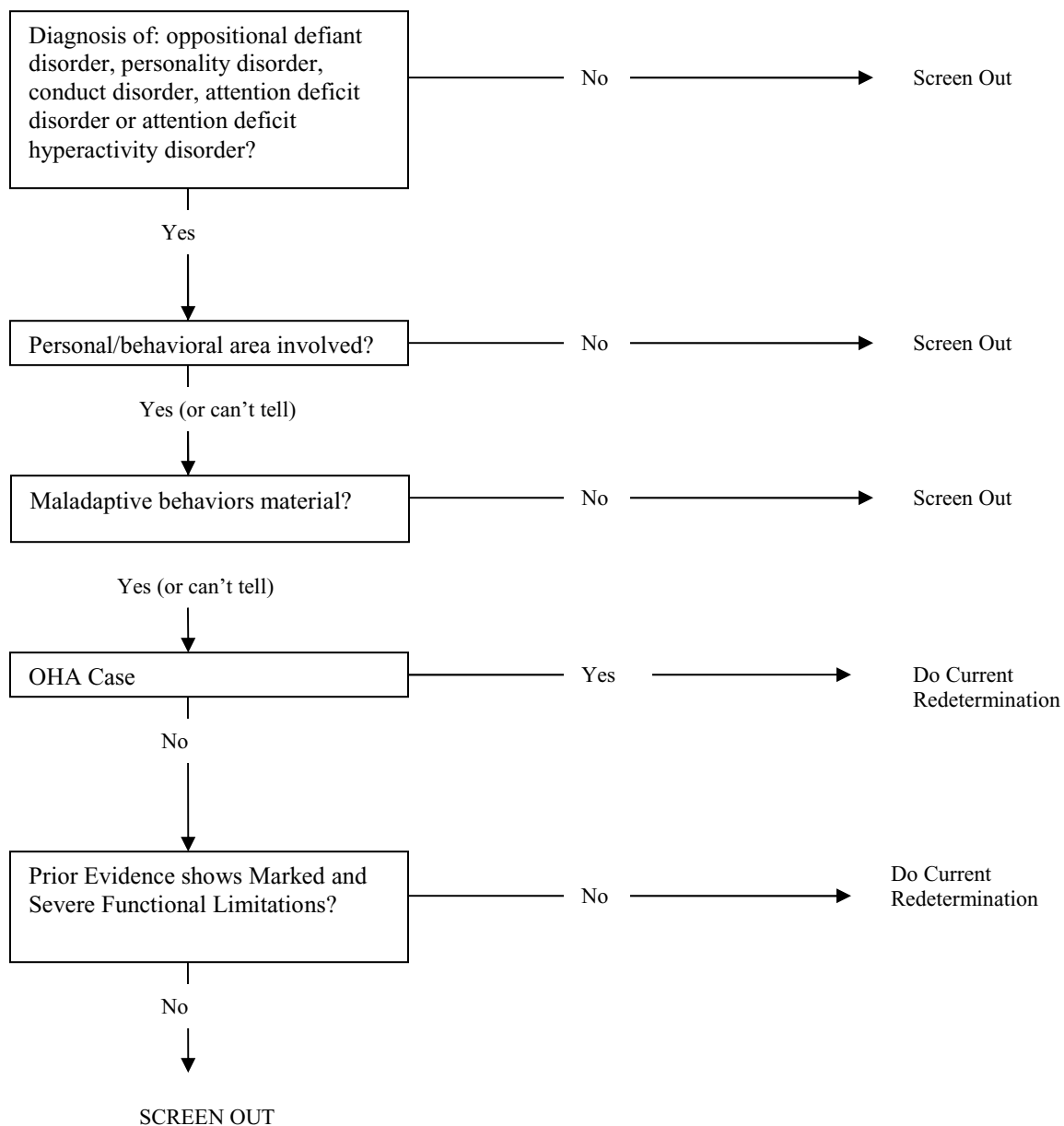


Figure 2. Childhood Disability Redeterminations-General. Policy Net-POMS

DI25299.001

Overpayments may result from the appeals process of 18 year old redeterminations (SSAB, 2006). If from the redetermination process cessations are determined, the recipient or in many cases parents as representative payees may request reconsideration and remain in payment status until the appeal process is exhausted (SSAB). The reconsideration process starts with sending the original denied case back to the State agency. If the case is denied at that level, an appeal request can be made at the SSA administrative law judge level. From that point, if the case is denied, a request for SSA appeals council review can take place. (SSAB) stated that if denied at that level, the recipient or representative payee can take the case to the federal court.

Both types of redeterminations can result in overpayments on a minor child's or young adult SSI record (SSAB, 2002). In either case, the overpayment is a federal debt and must be paid back to SSA (SSAB). Redeterminations have proven to be one of the best ways of detecting and stopping improper payments (SSAB). SSA employees have expressed concern about increased workloads and SSA recognized that the number of recipients has outnumbered its ability to perform the required amount of redeterminations (SSAB).

#### The Representative Payee Program of SSA

The beginning of the Representative Payee Program started in 1939 when congress passed legislation to extend SSA benefits to wives of retired workers and widows and dependent children (SSA, 2000d). Also, within the same legislation in 1939, congress gave SSA the authority to assign representatives payees for recipients found incapable of managing their funds. (SSA) the recipients had mental or physical impairments or were legally incompetent to an extent considered severe enough that they could not manage



their benefits to take care of their needs. SSA determined if an individual needed a representative payee by medical evidence, living situations, how recipients currently handle funds, and how recipients were supplying their own food, clothing, and shelter. (SSA) reported in 1972, when the SSI program was established, the representative payee program was included.

Recipients who are under the age of 18 and who are not emancipated are required to have a representative payee to receive SSI payments. Parents may serve as representative payees for minor children (OIG, 1997). In some cases the parent may not have custody of the child. Spouses, other relatives, legal guardians, friends, or institutions may also serve as representative payees (OIG). General responsibilities of a representative payee include timely monitoring of the recipient's food, clothing, medical care, and personal needs. Report changes to SSA if their ability to be representative payee becomes a hardship. (OIG) inform SSA of any changes in the recipients living arrangements, income, resources that may affect benefits amounts or eligibility for SSI payments. (OIG) return checks paid in error or not due to the recipient due to death or incarceration. (OIG) complete and submit accountability reports to SSA on how funds were used and how much was saved.

In addition to those responsibilities listed, if a person is a payee for a minor child, they are required to make sure treatment is given to the child if needed. Failure to tend to medical needs of a minor child can be cause for termination as representative payee (SSA, 2006d). After the representative payee makes sure daily needs and medical needs are met, funds may be spent on dental, educational training, and special purchases. (SSA)

for example, furniture and home improvements if they are for the betterment of the recipient.

Sometimes, a minor child may be due large sums of back payments because the disability determination process may take over 6 months or several years to make a favorable decision (SSA, 2006d). In those cases the representative payee must open a separate account on behalf of the child. SSA recognized the account as a dedicated account. (SSA) concluded that records must be kept on how the money was spent and receipts from purchases. Money from the dedicated account can only be used on medical, education, or job skill training. (SSA) reported special equipment, housing modifications, therapy, rehabilitation, or other services relevant to the minor child circumstances are allowed as expenses for a dedicated account. (SSA) found that if funds are used for any other reason the representative payee must first get approval from SSA or repayment may be required from the representative's own funds.

SSA has implemented a computerized Representative Payee System (RPS) for the representative payee program. SSA (2001b) reported the RPS system is instrumental in detecting fraud, appropriateness of applicants, and showing trends in representative payment services. (SSA) the RPS verifies social security numbers of representative payees, checks records electronically for misuse and fraud activity, and the RPS system does not allow selection of a person convicted of certain crimes by producing edits.

#### Management Assurance of SSA

The passing of the Social Security Act in 1935 established Social Security as an independent agency. In 1939 the President Reorganization Plan No. 1 changed Social Security to a subcabinet agency. In 1953, President Eisenhower moved Social Security to

the Department of Health, Education and Welfare (HEW). In 1980, HEW was replaced by Health and Human Services (HHS). SSA was made part of HHS and for years operated as a subunit of HHS (SSA, 2000e). In 1994, the SSA Independence Act became law and SSA began its operation as an independent agency on March 31, 1995 (SSA). SSA had its own responsibilities to manage the programs, promoting awareness of its services, and plan for the future. (SSA) the Commissioner of SSA gained status as a cabinet level position and reported to the President of the United States.

The intent for making SSA an independent federal agency again was to establish accountability measures for the public and responsibility to congress. Certain Acts were passed to make federal government more efficient by focusing on the principles of results-oriented management and financial accountability (GAO, 1996a). The Chief Financial Officers Act of 1990 (CFO Act), the Government Performance and Results Act of 1993 (GPRA), the Government Management Reform Act of 1994 (GMRA), and the National Performance Review (NPR) were for the purposes of making government work better at less cost (GAO). Since SSA became an independent agency in 1995 the administration had to adhere to the Acts and laws for compliance.

The Acts and laws describe specific requirement for performance reporting. A description of some of the Acts is reported by Collins (1997):

The Chief Financial Officers Act of 1990...establishes Chief Financial Officers in major Federal agencies and includes among their responsibilities provision for systematic measurement of performance. Performance reporting in the Government Performance and Results Act of 1993...is part of a larger system to be adopted by each Federal agency in order to integrate planning, budgeting, management, and performance assessment. The Government Management Reform Act of 1994... calls for agency financial statements that reflect the

results of agency operations and beginning with FY 1997, a government-wide financial statement that includes results of government-wide operations. (p. 2)

The NPR started in March 1993. Its main purpose was to review the federal organizations to find ways to improve their operations. The review period was for 6 months. The NPR identified 384 recommendations that pertained to several different aspects of program operations. Over the years the name of the review is no longer NPR. GAO (1999) the title has been changed to the National Partnership for Reinventing Government.

Also included in Collins description of Federal agency performance reporting is The Federal Financial Management Improvement Act of 1996 (FFMIA) and the Information Technology Management Reform Act of 1996 (ITMRA) (Collins, 1997). The FEMIA, “is intended to increase the capability of agencies to monitor the execution of their budgets by providing better support for the preparation of reports that compare spending of resources to results of activities” (Collins, 1997, p. 2). The ITMRA, “is intended to improve the ways that agencies acquire, use, and dispose of information technology and, thereby, to improve the productivity, efficiency, and effectiveness of Federal programs” (Collins, 1997, p. 2).

SSA compliance with the CFO Act is of being the first to produce an accountability report that was designed to give a holistic view of program performance and financial status (GAO, 1996a). The completion and accuracy of timely financial information is required by the CFO Act and the GMRA (GAO). In accordance with the GPRA, (GAO) SSA served as a pilot agency and worked towards improving the strategic management processes, creating performance criteria that supply information to program managers, congress, and the public. (GAO) SSA has also measured satisfaction levels

with its customers and employees to improve customer service objectives of the NPR Act.

The FEMIA objectives are met by SSA for maintaining a good status in producing financial statements with no mistakes cited by auditors and by having up to date financial systems in compliance with the law (SSA, 2006e). To comply with the ITMRA, GAO (1997b) SSA modernized its information systems by replacing computer terminals attached to mainframe computers to personal computer networks. (GAO) the objective was to improve productivity and customer services and offer enhancement for future technological investments.

#### Some Technological Innovations of the SSI Program

Information technology has gained more importance with SSA as workloads increase and public expectations for faster service continue to rise (GAO, 2002). The support of information technology is necessary for the large amount of programmatic and administrative activities required to meet goals and objectives of the SSI program (GAO). Information technology is also important for research activities and policy development.

A technological innovation that pertains to the detection and recovery of the SSI program overpayments is computer matching. Computer matching is regulated by the Computer Matching and Privacy Protection Act of 1988. Its framework is to protect matching activities by providing individuals due process before benefits are denied or terminated (SSA, 2000f). SSA (1996b) SSA has computer matching capabilities with the Office of Personnel Management, the Department of Public Affairs, the Railroad Retirement Board, Internal Revenue Service, Health Care Financing Administration,

State Wage and Unemployment records, Saving Bonds records, Prison, and jail records.

Some parents of disabled children have contact or affiliations with these agencies.

For example, the Internal Revenue Service (IRS) is required by law, The Deficit Reduction Act of 1984 (Public Law 98-369) to supply SSA with non wage information, interest payments from financial institution, income from dividends, and unemployment compensation, about SSI recipients (HCWM, 2003). In fiscal year 1987, computer matches from the IRS and SSI records made 239,000 matches. Another example of computer matching with state and local agencies that benefit the SSI program is interfacing with public institutions ((HCWM). After 1996, (HCWM) the law (Public Law 104-193) required the Commissioner of SSA to contract with mental institution and prisons to give names, social security numbers, date of birth, and other identifying information to stop SSI payments to be in compliance with prohibition of payments to residents of public institutions if they reside a full calendar month or longer.

SSAs field offices, as of January 2001, have the capability to access wage information, new employed individuals, and unemployment payment data from the Office of Child Support Enforcement from on line access to their databases (GAO, 2002). Verification of income and employment is essential for determining eligibility and payment amounts. (GAO) the interfacing with the Office of Child Support Enforcement makes information retrieval more quickly and accurate. In fiscal year 1999, it was estimated that about \$600 million was prevented in overpayments because of the computer matching process.

SSA has the authority to use TRO to recover overpayments (GAO, 1998a). The TRO is an automated debt collection tool to recover debt caused by overpayments of the

SSI program from people who are no longer receiving SSI payments. Its long term usage may deter recipients from not reporting information about income and resources (GAO). SSA (2006b) the Foster Care Independence Act (FCIA) of 1999 gives SSA the authority to use TRO as a debt collection tool. (SSA) the Deficit Reduction Act of 1984 gives SSA the authority to collect debts directly from revenue sources like the IRS. SSA implemented the TRO process in 1992.

In 1998, the TRO process was expanded to include SSI overpayments (SSA, 1999b). The process starts by SSA sending notices to the Treasury Department of recipients with past due debts from overpayments. The treasury department subtracts the debt from recipient's income tax refunds. (SSA) the debts can be collected even if the debt has been written off by SSA. The notices from SSA must list correct amounts of overpayments. The amounts must be past due and legally collectable and the debt must be referred to the Secretary of the Treasury within 10 years after the debt occurred (SSA, 1997). The program at the treasury department is called the Treasury Offset Program (TOP). "TOP is a centralized offset program through which Financial Management Service (FMS) offsets tax refund payments, as well as other non-tax Federal payments, to collect delinquent debts owed to Federal agencies and States" (Department of the Treasury, 2005, p.2).

#### Views about the SSI Program

The SSI program is available to low income disabled people and it is a part of the national economic safety net for disabled people (Auxter, 1999). Issues of fraud, misuse of funds by representative payees, reporting behaviors of participants, and the detection and recovery of overpayments are concerns of oversight authorities and the public (GAO,

1997c). Some studies, reports, and views about fraud and abuse, the representative payee program, and technological applications of the SSI program are described below.

### *Fraud and Abuse*

Dean and Melrose (1997) reported on a study that involved interviewing a small sample (35 respondents) on fraud in social security benefits and uncovered some theoretical principles. Investigations on attitudes and motivation of participants involved in such activities that deceived the federal government was of concern. The authors make mention that social policy academics and poverty lobbyists are coy about fraud and SSA and place it as a minor problem. Inferences are given towards individual fraud cases known as fiddling than organized fraud cases where middlemen are involved.

The results from the study found that claimants who fiddle were not fully aware of how the system works. Dean and Melrose (1997) suggested, the main reason for fiddling was due to economic necessity by not having enough income. The claimants also believed that many people were fiddling which caused them to feel comfortable about their behavior. They felt that having low income was of more concern than the chance of getting caught. Most of the claimants felt they had a legal right to claim for benefits and unsure about their obligations. (Dean & Melrose) they also felt that fiddling was not bad. But, they experienced some levels of stress from performing such behavior. No conclusive evidence was found towards the type of people that fiddled.

Participants of the SSI program have 10 days to report changes that affect eligibility (Livermore, 2003). If they do not report there are non reporting penalties. (Livermore) reported that the first time a \$25 penalty could be access. For a second occurrence a \$50 penalty can be accessed and \$100 for each subsequent occurrences.



Greenberg and Wolf (1986) reported that fraudulent behavior may not be the case from participants' nonreporting or misreporting of income by participants is found. Management of welfare programs should distinguish between failure to report income due to inertia, oversight, ignorance, or not knowing the rules and regulations. Fraudulent behavior is evident when such information is requested by the agency and willful withholding or misrepresentation of income is performed.

Young (1983) focused on behavior of abuse. One specific characteristic that is explored in the article that makes social programs vulnerable to abusive behavior from participants is the reliance on client reporting of information that have a direct affect on eligibility and monthly payments amounts. Information reported that is false, inaccurate, and incomplete towards income, resources, and living arrangements are the three main sources of overpayments for the SSI program.

SSAB (2003) reported on a yearly problem for the SSI program that is wage reporting. Retrospective monthly accounting system is used to compute SSI payment amounts. The principles of retrospective accounting involve basing payments on known or reported data or information for a past month. For example, (SSAB) the payment that is made in August is based on income received in June. If income is reported and recorded timely overpayments should not occur. The retrospective accounting system makes it less complicated to compute monthly payments amounts for SSI recipients. The participants of the SSI program retrospective accounting make it difficult for them because they live at or near the poverty level and decrease in monthly payment amounts causes difficulties (SSAB).

Living arrangement is also a primary factor in determining monthly payment amounts that contribute to overpayments for SSI recipients (SSAB, 2003). The SSAB reported, from one of their observations, that program rules that govern recipients living arrangements are complicated and difficult to administer. The process of determining living arrangement also cause equity issues and is an area that is vulnerable to fraud and abuse (SSAB). The GAO (SSAB) also has commented on the need to simplify rules pertaining to the living arrangement process and noted that SSA has done little to make the rules less complicated.

The SSI program has had a problem with people transferring valuable resources to qualify for SSI payments. According to GAO (1996b):

Beginning in 1981, individuals filing SSI claims were prohibited from transferring resources for less than fair market value to qualify for SSI. Under the provision prohibiting such transfers, SSI applicants or recipients who got rid of resources to qualify for SSI had the uncompensated value of those resources counted toward the resource limit for 24 months from date of transfer. As a result, such individuals were probably ineligible for SSI benefits for 2 years after transferring resources. (p. 3)

The restriction of transferring resources for less than fair market value to qualify for SSI benefits was lifted in 1988 by Congress. (GAO) in 1989, the number of nonexcludable resources transfers increased dramatically.

#### *The Representative Payee Program*

Views from Huse (2003), the Inspector General, on the representative payee program of SSA are found in a statement to the HCWM. The HCWM observed the need to better protect recipients from representative payee misuse of funds (HCWM, 2003). Another view from (HCWM) was that improvements should be made in the selection of

people as representative payees, monitoring of the payees activities towards spending funds, and measures to penalize and stop misuse of funds.

If more attention is given as to who is selected it may reduce some of the problems of misuse (SSA, 2003a). For example, “ a study was performed that identified 121 individuals serving as representative payee for others whose own benefits were stopped by SSA because they were fugitive felons or parole or probation violators” (SSA, 2003a, p. 3). Once a suitable representative payee is selected SSA should monitor the use of funds to ensure the beneficiary needs are being met. A yearly accountability form must be completed (SSA). It has been recommended that if the payees do not complete the accountability form the benefits checks are to be redirected to field offices and the requirement for the representative payees to complete the accounting form must be done before releasing checks (SSA). SSA management decided to wait on that action until legislation was passed to support such actions.

Punishment and deterrence guidelines for representative payee misconduct can be found in the Civil Monetary Penalty (CMP) program (SSA, 2003a). Some of the cases that involve misconduct of representative payees are not enforceable under the current CMP program. SSA (2003a):

For example, the benefits of a disabled child whose mother (as a minor herself) could not serve as her sons representative payee were instead paid to the father. The father, who did not live with the child and the child’s mother, converted more than \$10,000 of his child’s benefits to his own use. The U.S. Attorney declined to prosecute the father criminally, and the case was referred to my office [Inspector General] for consideration under CMP statutes. Unfortunately, the current CMP statutes do not provide for penalties to be imposed for conversion of benefits by representative payees. (p. 4)

The observation that the CMP program rules needs to be amended to address concerns that pertain to the conversion of SSI payments by representative payees should be viewed necessary to combat the misuse of funds.

The Committee on Social Security Representative Payees National Research Council (2007) found that the most of the representative payees perform their responsibilities within the guidelines of the representative payee program at SSA. There was a lack of knowledge of placing unused funds in a saving account for the beneficiary. It was noted that the representative payee program at SSA does not require adequate accountability measures and reporting criteria by payees. The current system appears not to be useful in detecting possible misuse of funds by representative payees.

The primary tool that SSA uses to detect misuse of funds by representative payees is the yearly accounting form (SSA, 2006d). The misuse of funds can also be brought to SSA attention from allegations reported by relatives, beneficiaries and other persons that are concerned about the welfare of the recipient (SSA). The Committee on Social Security Representative Payees National Research Council (2007) claims that the accountability form does not have adequate questions or request information for discovering misuse of funds and the form is not kept in SSA data bases. In cases of allegations, most of the personal reports are not investigated or documented as misuse of funds. If a change is made by selecting another representative payee it is usually noted as more suitable payee.

#### *Technological Applications*

A primary responsibility of SSA is to administer the SSI program to ensure only eligible disabled people receive the benefit and that payment amounts are accurate (GAO,

1996c). In 1996, the GAO performed an assessment of implementing access to state agency information electronically (GAO). The objectives were to “improve the administration of the SSI program, reduce overpayments, and be easily implemented nationwide in SSA field offices where the public applies for SSI” (GAO, 1996c, p. 1).

GAO visited three states where the testing of using on line access to state data was occurring (GAO, 1996c). At SSA headquarters, regional and field offices officials were interviewed and overpayment data was analyzed from SSI records. GAO found that the administration of the SSI program could be improve and a significant amount of overpayments could be detected or prevented if information was easily accessible from state databases for claims processing and post entitlement processing (GAO). The study occurred between July 1995 and July 1996. (GAO) it was reported that \$131.3 million in overpayments could have been detected or prevented due to nonreported or inaccurate reported of income information for a 12 month period nationwide.

The GAO (2002b) described SSA request to Congress for new authority and tools to address the integrity problems of the SSI program. The creation of the Foster Care Independence Act of 1999 gave SSA such authority and tools to deter fraudulent and abusive behaviors, recipients income and financial resources could be better detected, and improve the capability to recover overpayments (GAO). The Act granted SSA the authority to obtain information from banks and other financial organizations (GAO). Computer matching capabilities were acquired to identify overpayments caused by unreported income and living arrangement changes (GAO). Automation improvements (GAO) were also implemented to help management of the SSI program and field employees to control overpayment workloads.

Software was updated on the computer systems of SSA nationwide that automatically access several internal and external databases that house financial, employment, and income and resource changes (GAO, 2002b). When the social security number is entered the examination starts automatically. SSA was granted access to the Office of Child Support Enforcement's National Directory of New Hires (NDNH). It is a main source of information that has unemployment and new hire data from all over the country (GAO). The access to NDNH (GAO) was estimated to result in about \$200 million for the SSI program overpayment problems.

#### Workforce Challenges of the SSI Program

One other reason why SSA was chosen to administer the SSI program is that SSA was already supplying exceptional service to the aged and disabled people through the Social Security benefit programs (SSAB, 2002). Congress and SSA management assumed the added responsibility of administering the SSI program would fit right in with the existing organizational structure. As it turned out, applications for disability payments out numbered the applications for the aged (SSAB). The disability determinations process, interviewing applicants, and determining resource eligibility requirements took more time and effort than anticipated by Congress and SSA management (SSAB). Staff increases (SSAB) were requested by SSA management and Congress granted permission to hire additional staff and increase usage of overtime.

There are several problems that SSI employees face while administering the program. Overpayment, nonmedical redeterminations, and representative payee adjudication are complex and time consuming workload processes (SSAB, 2002). All of SSI overpayments are not subject to automated collection tools. SSI recipients can

request a waiver for overpayments. SSA has been granted authority to overlook or waive overpayments if it finds that the recipient is without fault and if the collection of overpayments that would defeat the purpose of the SSI program or is against equity and good conscience (SSAB). The debt is no longer owed if waived (SSAB). To process a waiver request requires research into past activities, for example, work and unemployment records of recipients and/or parent (s) and SSI payment history of recipient's records. In a study of SSA waiver process, the OIG, "found that nearly nine percent of the waivers were incorrectly granted and half were inadequately supported....field offices often do not pursue overpayment collection because staff is too busy. It is easier for them to waive the debt" (SSAB, 2002, p. 23).

Some examples of problems with nonmedical redetermination processing reported by staff include recipient's reporting of changes in living arrangements and resources (GAO, 1997c). Some concern from staff is that false statements are made to receive a higher level of cash (GAO). For example, when a couple lives in the same household and receives SSI payments, the amount is less than if they were living separately. Once the couple find out they can receive more money by living apart, allegations are made to that effect and verification must be obtained for proof (GAO). In some cases ownership of resources, such as, houses, land, and cash are transferred by some recipients to be eligible for SSI payments (GAO). "Although these transfers are legal, using them to qualify for SSI benefits raises serious questions about SSAs ability to protect taxpayer dollars from waste and abuse and may undermine the public's confidence in the program" (GAO, 1997c, p. 4).

When unreported income is detected by system automation techniques, alerts to field office staff is generated (SSAB, 2002). There is pressure on staff to complete daily work that is urgent and it makes it difficult for staff to follow up on the alerts received in a timely manner. Field office managers have expressed concern over the quality of work from staff (SSAB). They lack sufficient level of staff to perform all of the work activities required by the SSI program. Managers have concern for themselves as well (SSAB). The reduction of management staff (SSAB) had created more responsibility for the remaining managers and had caused major deficiency in their capacity.

The representative payee program is another process that has caused concerns for staff and management of the SSI program. “In May 2000, the Inspector General told the House Ways and Means Social Security Subcommittee that representative payee activities are a workload that gets deferred in field offices. It is not addressed because there are other priorities that interfere” (SSAB, 2002, p. 24). The field office staff has commented to the Board that pressure to complete work in a timely fashion makes it difficult or impossible to investigate and verify qualification of representative payees according to the standards that are set (SSAB, 2002). There are staffing problems in the field offices. (SSAB) a survey that was performed in December 2001 disclosed that over 97 % of the respondents placed emphasis on obtaining processing goals creates pressure and burnout and is affecting employee morale.

#### Integrity Issues of the SSI Program

Administering the SSI program is very complex. Its’ design must be flexible and responsive to the changing needs of recipients (SSA, 1999a). There have been several changes in procedures and processes to accommodate changes in laws enacted in



response to SSAs management strategy to address concerns from the environment (SSA). To strengthen the program integrity further, the OIG and the management of SSA developed an all inclusive anti fraud plan titled Zero Tolerance for Fraud. (SSA) the purpose of the plan is to prevent and detect fraud, investigate and enforce charges to those who misrepresent or omit information to obtain benefits that are not due to them.

The antifraud plan has three goals. The goals are to, “change programs, systems, and operations to reduce instances of fraud; eliminate wasteful practices that erode public confidence in SSA; and prosecute vigorously, individuals or groups who violate the integrity of SSAs programs” (SSA, 1999a, p. 12). (SSA) the stewardship of the SSI program remains one of the top priorities for management of SSA.

Every year SSA conducts stewardship studies of the SSI program (SSAB, 2003). Samples of nonmedical reviews in current payment status are reviewed for statistical analysis and goal attainment. The studies revealed that SSA is better at detecting overpayments than preventing overpayments (SSAB). A survey conducted by the National Council of Social Security Management Association asked managers in field offices about the integrity of the SSI program. SSAB (2000) one hundred and eleven managers responded to the survey. Fifty percent rated the SSI claim work as fair or poor.

The staff voiced concern about the integrity of the SSI program (SSAB, 2000). Some comments were that they do not ask certain questions because it takes too long to resolve and investigate issues (SSAB). Areas of question involved living arrangements, earning, and representative payee investigation. Interviewing claimants is given higher priority (SSAB). The results of the survey concluded that greater emphasis needed to be placed on preventing problems before they occurred (SSAB).

### Using the Case Study Approach for this Study

A research approach that is designed to address the need to produce data and information that justifies service provision of service organizations is the case study approach. It is a research approach that can be developed from assumptions to explore specific problems of service organizations and measured by analytical tools (Greenwood & Lowenthal, 2005). Other qualitative research approaches have different perspectives from which to study subjects or situations.

The ethnography approach allows a researcher the perspective of studying an entire culture (Trochim, 2006). Even though an organization can have a specific culture that is not the perspective of this study. Phenomenology has a philosophical perspective. The approach allows the researcher to focus on understanding how people subjective experiences and interpretation of those experiences influence their view of the world (Trochim). The perspective of this study is about management of SSA strategic responses to problems of the SSI program. (Trochim) field research requires a researcher to go into the field and observe, take notes to analyze a phenomenon in its natural environment. SSA is a Federal organization. Permission was not granted to report on observations from employees, claimants, or management for this study. (Trochim) the grounded theory approach to qualitative methodology requires a researcher to develop theory that is rooted in observations. Since reporting on observations was denied for this study, the grounded theory could not be used.

One advantage to the case study approach is that it is a compelling mechanism that can describe programs input, process, and output to outsiders (McNamara, 2007). Another advantage of the case study approach is that it is an excellent way of exposing

complex concern or objectives that are already known and can build upon experiences from previous inquiry. Relationships can be detailed and analyzed for certain events or circumstances (Soy, 2006). One other advantage to the case study approach Yin (2003) is that it allows researcher to see a whole view of reality of management and organizational processes.

### Summary

Management of SSA and the SSI program have responded to feedback from behaviors of participants and the concerns from oversight authorities from the environment. Management responses included the implementations of strategies that sought permission through laws that shaped procedures, processes, focus, resources, technological upgrades, and implementation to better administer the SSI program more efficiently. The SSI program was established in 1974 for daily operations (SSA, 2000a). The original intent for the program was set up on participant cooperation towards reporting data and information needed for eligibility and payment determinations. Through the years, participant reporting behaviors were less than the original intent assumed (SSA). This researcher has come to the conclusion that, as long as management practices of SSA and the SSI program continues to respond with objectives, goals, and performances that address environmental changes and concerns of oversight authorities, the system that offers cash benefits to low income disability people in the United States should continue to thrive.

Chapter 3 further explained the case study approach to examine the problem of improper payments of the SSI program. An analysis was performed by comparing overpayment levels and dates to some of the procedures and technological applications

management of SA has implemented to improve the detection and recovery of overpayments that improve integrity issues of the SSI program. The benefits of using existing records for secondary data are presented. Time series analysis was described.

Chapter 4 reviewed the dissemination of information from federal organizations. Technological applications that aid in the detection and recovery of SSI overpayments are described. The responses to the research questions from this research effort and the interpretation of those findings are reported.

Chapter 5 explored organizational learning from the view point of SSI overpayments. The answers to the 5 research questions are covered. Recommendations for further study and actions are reported.

## CHAPTER 3: METHODOLOGY

### Introduction

The purpose of this study was to examine how well management of SSA and the SSI program has responded to the concerns of congress and other oversight authorities. Examination of some management practices developed or implemented over the past 8 years (1998 through 2005) that addressed the problem of noncompliance of participants on reporting changes in income, resources, and living arrangements that result in overpayments and integrity issues for the SSI program were of concern. The study helped determine how effective those practices were towards meeting the programs' objectives and goals for payment accuracy and reporting requirements and in turn, gauge any improvement with integrity issues of the SSI program.

Management of SSA and the SSI program has responded by trying to control feedback from governmental, sociocultural, and technological sectors of the environment. Feedback control is a function that produces a natural balance of open systems operations. In system theory the process is called homeostasis (Clayton, Myrtle, Rose, Siegel, & White, 1980). Since organizations have interactions with the environment there is a normal tendency of trying to stay balanced. The process (Clayton et al., 1980) can involve adjustments to goals, objectives, or purpose that will keep parts of its operational function as if no harm was done.

Congressional assessments, other oversight authorities inquiries, and financial reports from the SSI program acts as sensors that take information from output of program operations, match it to organizational goals, objectives, or purpose and respond by reporting its findings to management of SSA and the SSI program. This process is

referred to as a feedback loop in systems theory (Clayton et al., 1980). Management of SSA and the SSI program (Clayton et al.) have implemented procedures, policies, and technological mechanisms in response to the information received from feedback loops from the environment.

### Research Design

Qualitative methodology using a case study approach was appropriate for this study. Qualitative methodology is ideal for documenting experience to understand human observations that are not conducive to numbers (Babbie & Rubin, 1997). According to Merriam (1998) the case study approach has heuristic quality. A description of heuristic quality is described by Merriam (1998):

Explains the reasons for a problem, the background of a situation, what happened, and why. Explains why an innovation worked or failed to work. Discusses and evaluates alternatives not chosen. Evaluates, summarizes, and concludes, thus increasing its potential applicability. (p. 31)

SSA is a social service organization that manages several different forms of social insurance programs for people in the United States. The case study approach was appropriate for this research effort for several reasons discussed later in this chapter.

### Case Study Method

Le Play (1806-1882), Malinowski (1884-1942), and the Chicago school were instrumental in the recognition of case research in the United States in the 19<sup>th</sup> century (Harra, Lautamo, & Salminen, 2006). Case study research main reason is description. For social service agencies, the study should analyze the phenomenon of organizations delivery to better position themselves to the dynamic influences from the environment that may influence the service that is administered (Babbie & Rubin, 2001).

Creswell (1998) described a case study as a bounded system that is studied over a time frame using many forms of examination that have or give detailed information. The case for this proposed study is the SSI program. The time frame is (1998 through 2005). Unit of analysis will be of several different types. The case can be about an organization, a program within an organization, and decisions made by management of an organization (Babbie & Rubin, 1997). This study was concerned with management decisions towards meeting certain goals and objective of the SSI program.

#### Using Existing Records for Case Study Research

Examination of a program is not necessarily dependent on primary sources of data or information. Information or data obtained from secondary sources is considered existing records. Initially, the data or information was collected for other reasons or purposes. There are two different types of existing records. Some records are collected from regular organizational processes. Other records are from outside sources, such as, surveys or reports about participants and statistical data (Peterson, n.d.). Records that are from program operation of federal organizations are required by law (SSA, 1999b). SSA is required by the Government Performance and Result Act (GPRA) of 1993 (SSA) to create and solidify processes for planning and measurement of operations as apart of the feedback loop.

The use of existing records of a program's performance that pertain to finance, operations, and correspondence (internal, external) does not invade on daily operations of the administration of the program because the information is there already (McNamare, 2007). The ability to obtain records (Peterson, n.d.) is enhanced by availability and accessibility of information and data. The cost can be minimum, no staff or limited

number of staff, are needed, and information of past years performance can be readily available.

For this study, secondary records and reports were used because of refusal from SSA to grant permission for a field study to collect primary data (see appendices A-C). The use of secondary records and reports for this research was approved by my committee members. The committee members also gave instructions to notify my employer of the change in research protocol.

#### Nature of Secondary Data Sources

Secondary data or information found using existing records can serve for future research (Cooper & Emory, 1991). Previous researchers that have studied phenomena of organizations had different purposes or reasons to conduct the study. They document information and data that is considered secondary data sources that can be used for future research by others. In some cases, primary activities to gather data or information are not feasible for an individual researcher (Cooper & Emory). For example, activity from census reports on populations or areas and industry performance. Secondary data and information (Cooper & Emory) fills a gap on some reference criteria. Secondary data or information is an important segment of an expanded research effort and it can be the only data and information used for a research project.

#### Data Collection Procedures

Data and information for this study were from public records. The data were secondary from operational, performance, financial, and authority oversight reports and inquiries since permission was not granted for primary data collection activities. (see appendices A-C) The reports and inquiries were obtained by utilizing the Internet.



Congressional inquiries, administrative, procedural, and operational reports that focused on the SSI program are of interest for data and information for this study. The validity and reliability of SSA reports are found in the Social Security Administration Information Quality Guidelines 2005. For research purposes, the guidelines described the terms of utility, objectivity, integrity, transparency, and reproducibility.

The usefulness of data and information from the guidelines of SSA sources described its utility. SSA data and information dissemination process provide analytical and statistical reports available and accessible for all audiences. Objectivity is addressed by making sure the information and data are accurate, reliable, and unbiased in their presentation. Security of information and data refers to integrity. Transparency involves descriptions of methods, data, and information that are clear to explain operational and production designs. Guidelines for usage for research purposes are documented as reproducibility allowances of sources (SSA, 2005b).

Data collection procedures for this research effort involved three principles reported by Yin (2003): (a) Use of multiple sources, (b) A presentable database of information, and (c) Evidence of external observations. Multiple sources are from oversight inquiries, financial reports, and program performance and operation reports. Databases include statistical studies from program results of administration. Evidence is from fiscal year operational reports.

#### Types of Data and Information for Analysis

Nonreporting changes in income, resources, and living arrangements cause overpayments for the SSI program. This study is concerned with how management practices have changed to deal with noncompliance of those reporting requirements and

improvement towards integrity issues of the SSI program. The research questions for this study required different types of data and information to answer them and public records were used.

Question 1. What were the SSI overpayment amounts and trend from 1998 through 2005? This question was addressed by accessing web sites of SSA on the Internet. Sources of data and information are from SSA reports titled: Fiscal Year 2006 Performance and Accountability Report, SSI Corrective Action Plan, Causes of Supplemental Security Income Overpayments Fiscal Years 1996 through 1999, SSI Corrective Action Plan: Removing SSI from GAO's High Risk List, Financial Indicator Reports, and Management Discussion and Analysis. Types of data: The fiscal years (October through September) 1998 through 2005 and amounts of overpayments (represented in U.S. currency) that occurred during those years.

Question 2. What technological innovations were developed to detect overpayments during the same time period and how have they improved debt collection? Accessing the Internet has supplied sources that address this question. Sources of data and information are from the United States General Accounting Office titled: Social Security Administration Agency Must Position Itself Now to Meet Profound Challenges. The Office of the Inspector General report titled: Social Security Administration: Supplemental Security Income Overpayments. Types of information and data are: Names and descriptions of technological innovations and dates of implementation.

Question 3. How has workflow processes or procedures, performed by employees, addressed the feedback in the form of overpayments from SSI claims processing? Reports used are from the Congressional Research Service titled: CRS

Report for Congress: Social Security Administration: Administrative Budget Issues, SSA 2007 Annual Report of the SSI Program, Annual Statistical Supplement, and the 2006 Annual Report of the Supplemental Security Income Program. Types of data and information were descriptions of processes or procedures, dates of implementation, numbers of recipients involved in the processes or procedures.

Question 4. How has participation levels changed from 1998 through 2005 and how has this impacted management practices? Reports used are: SSA 2006 Annual Report of the SSI Program, Annual Statistical Supplement 2006: Supplemental Security Income, and the SSI Annual Statistical Report 2004. Types of data and information are: A description of management practices and the number of participants for the fiscal years 1998 through 2005.

Question 5. How have changes in management practices resulted in improved accuracy of payment for SSI disability claims? Reports used are: SSI Annual Statistical Report 2004 and SSA 2005 Annual Report of the SSI Program. Types of data and information are descriptions of management practices and levels of overpayments for the time span of years 1998 through 2005.

The yearly overpayment amounts for the SSI program were averaged and tabulated over the 5 year period to answer question number one. A description of automation and interfacing technology that SSA uses for detection and recovery of overpayments and the order of implementation dates will be used to answer question number two. A description of the two different types of redeterminations and their dates of implementation, overpayment levels over the years 1998 through 2005 were used to answer question number three. Amount of disabled participants of the SSI program over

the years 1998 through 2005 were tabulated to answer question number four. Levels of overpayments for the SSI program compared to implementation dates of management practices were compared and contrasted to answer question number five.

### Data Analysis

Data analysis was performed by using time-series analysis. Time series analysis is, “a set (or series) of numerical values of a particular variable listed in chronological order....[that] involves classifying and studying the patterns of movement of values of the variable over regular intervals of time” (Eng, Murph, & Sanders, 1985, p. 362).

Overpayment amounts for the SSI program over the years of 1998 through 2005, program participation levels, technological innovations implementation dates, and work processes or procedure dates were compared and contrasted to examine their impact on overpayment detection and recovery. Time series analysis aided in determining if management decisions towards controlling overpayments were reasonably correct and had a positive affect towards reporting behavior of participants and integrity issues of the SSI program.

### Importance of Time Series Analysis

An important area of management decision making is the ability to forecast or predict future trends in operation processes. A quantitative method that is instrumental in forecasting or predicting operational procedures is time series analysis (Levin, 1987). To better understand patterns of past and current performance of a program or an organization, time series analysis can offer insight for future investments in the program or organization (Eng et al., 1985). Management of SSA and the SSI program must engage in the activity of planning in order to cope with changing environments. Forecasting,

planning, and decision making for the future of the SSI program have major impact on strategies, goals, policies, and procedures that affect disabled people of the United States.

### Summary

Inaccurate, even fraudulent reporting of changes in income, resources, and living arrangements are the three main causes of overpayments for the SSI program.

Observation as to what management has done to detect and recover overpayments help to describe what has been done in attempts to restore the integrity of the SSI program.

Management of SSA and the SSI program is constantly faced with challenges with changing environments.

Chapter 4 listed the responses from this research effort. Interpretations are reviewed. The technological applications that aid the SSI program in the detection and recovery of overpayments are reviewed.

Chapter 5 described the summary and conclusion of this study. Organizational learning opportunities are explored for the management of the SSI program. The answers to the research questions of this study are reported.

## CHAPTER 4: FINDINGS OF THE STUDY

### Introduction

The purpose of this study was to examine how well management of SSA and the SSI program has responded to the concerns of congress and other oversight authorities. Examination of some management practices developed or implemented over the past 8 years (1998 through 2005) that address the problem of noncompliance of participants with reporting changes in income, resources, and living arrangements that result in overpayments and integrity issues for the SSI program were of concern. This study helped determine how effective those practices were in meeting the programs' objectives and goals toward payment accuracy and reporting requirements and in turn, gauge any improvement with integrity issues of the SSI program.

Since this study used public records for analysis this chapter is arranged to describe required management activities regarding data collection activities designed to satisfy inquiries from oversight authorities and the public. The review of standards about quality, objectivity, utility, and integrity of disseminated information from Federal organization were described. Also, the standards, as they pertain to SSA as a Federal organization that disseminates information to the different audiences and the mechanisms/reports used to report financial, work processes, and procedures that respond to the inquiries are examined. Responses to the research questions listed in chapter 1 are developed using data from those documents to create trend analysis that reflect performance data generated from those reports dated between the years 1998 through 2005.

## Dissemination of Information from Federal Agencies

The Office of Management and Budget (OMB) was directed by congress, section 515 of the Treasury and General Appropriations Act for Fiscal Year 2001, (Public Law 106-554; H. R. 5658), to issue government wide requirements on standards for federal agencies information dissemination practices to the public. The requirements are considered guidelines on policy and procedures for federal agencies that disseminate information and are published in the Federal Register (66 FR 34489) (Federal Register [FR], 2002). SSA is a federal organization that has to adhere to the guidelines set by OMB to be in accordance with the law.

The guidelines were designed, “to help agencies ensure and maximize the quality, utility, objectivity, and integrity of information that they disseminate (meaning to share with, or gives access to, the public). It is crucial that information Federal agencies disseminate meets these guidelines” (FR, 2002, p. 8452). The OMB guidelines that are listed in the FR (2002) defined:

Quality as the encompassing term, of which, ‘utility,’ ‘objectivity’ and ‘integrity’ are the constituents. Utility refers to the usefulness of the information to the intended users. Objectivity focuses on whether the disseminated information is being presented in an accurate, clear, complete, and unbiased manner, and as a matter of substance, is accurate, reliable, and unbiased. Integrity refers to security—the protection of information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification. (p. 8453)

The guidelines apply to most of the Federal agencies that adhere to the Paperwork Reduction Act of 1995 (PRA).

The PRA defines agency as, “any executive department, military department, Government corporation, Government controlled corporation, or other establishment in

the executive branch of Government (including the Executive Office of the President), or any independent regulatory agency” (Public Law 104-13, 1995, p. 164). The GAO is excluded from the PRA and OMB guidelines because of its mission or purpose.

According to GAO (2005a):

The audit, evaluation and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analysis, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO’s commitment to good government is reflected in its core values of accountability, integrity, and reliability. (p. 22)

The information and data from this study are from reports disseminated by federal agencies that have to abide by the PRA and OMB guidelines except the GAO reports and studies.

#### Electronic Information Retrieval and Dissemination of Federal Records

Most of the information used to answer the research questions of this study are obtained from electronic records of the federal government. The Internet is the source. The OMB guidelines also pertain to information disseminated on the internet. Since the internet allows agencies to communicate and disseminate information quickly and easily to a large audience, it offers many benefits to society. If the information does not meet certain quality guidelines it causes potential problems for agencies if those quality guidelines are not followed (FR, 2002).



Management of SSA has several different audiences that they disseminate information to electronically. Several principles were applied in the development of the OMB guidelines. FR (2002) reported:

OMB designed the guidelines to apply to a wide variety of government information dissemination activities that may range in importance and scope. OMB designed the guidelines to be generic enough to fit all media, be they printed, electronic, or other form. OMB designed the guidelines so that agencies will meet basic information quality standards. OMB designed the guidelines so that agencies can apply them in a common-sense and workable manner. (pp. 8452, 8453)

During President Clintons' administration, the technological aspect of government involved the concept of reinventing government (NPR, 1994). The, "underlying rationale is that our current system of government was invented as an Industrial Age methodology, designed to achieve Progressive Era goals of fighting corruption; we now need a 'reinvented' Information Age methodology, designed to fight over-spending" (NPR, 1994, p. 2). Technological applications have been implemented for the administration of SSI program to become more efficient in disability claims processes, procedures, and information retrieval and dissemination for accountability measures to oversight authorities and the public.

### SSA Reporting Responsibilities

In 1996, the congress required the Commissioner of SSA, by the passing of the Personal Responsibility and Work Opportunity Act of 1996 (Public Law 104-193), to report on a yearly basis to the president and the congress (SSA, 2006f). The annual report from SSA is to relay information and projection on program performance of the SSI program, as well as, the other social service programs administered by SSA (SSA). The Government Performance and Results Act of 1993 (GPRA) require federal agencies to

consult with the senate and house appropriations committees and subcommittees that have authority over funding to evaluate agency performance in achieving program goals. Streeter (1998) reported multiyear strategic plans, annual performance plans, and annual performance reports are involved with GPRA performance evaluation process.

SSA is further mandated by the Improper Payments Information Act of 2002, to report on overpayments of the SSI program (SSA, 2006a). The OMB guidelines require overpayment reports on a yearly basis (SSA). The OIG conducts yearly audits, evaluations, and investigations on fraud, waste, and abuse of the SSI program to administration officials, congress, and the public (OIG, 2004). Data and information was collected from such reports and records found on electronic databases for this study.

#### Data Matching and Data Sharing at SSA

In order for SSA to perform data matching and data sharing activities with other public and private organizations the social security number is used as identifiers (Streckewald, 2000). Originally social security numbers were created and used by SSA to associate wages or earnings with individuals who worked in jobs that were covered by social security and to pay benefits in accordance to those wages or earnings amounts (Streckewald). Workers were required to have social security numbers and the guidelines were published in Treasury regulations in 1936 after the passing of the Social Security Act of 1935 (Streckewald). Through the years, the use of social security numbers as identifiers have expanded in government and private organizations for record keeping, electronic business applications, and automated data processing (Streckewald).

Data matching by SSA is used to verify eligibility, to protect the integrity of their programs, and as a debt collection tool (Streckewald, 2000). The use of social security

numbers is instrumental to the process of data matching with other federal and state agencies. SSA computer matching is mandated by the Computer Matching and Privacy Protection Act of 1998 (Streckewald). A description of how computer matching occurs at SSA is reported by Streckewald (2000):

A computer comparison of an entire non-SSA database of information is matched against an entire SSA database (e.g., all Federal Workers Compensation cases compared to all disability beneficiaries). The computer compares the records for discrepant information, and may also identify characteristics of highly suspicious cases. After the computer comparison discovers discrepancies, an alert is sent to an SSA employee to investigate. The employee notifies the beneficiary, advising him or her that information produced by matching may disqualify the individual from receiving benefits or results in a reduction of benefits, but no adverse action will be taken until he or she has had an opportunity to contest the information. Only after due process has been satisfied will SSA take action, if warranted, to change the benefits. (p. 7)

To improve the payment accuracy of the SSI program data matching with organizations that have records of wages and financial accounts are being heavily pursued.

Data sharing by SSA and other federal and state organizations was developed as a debt collection tool (Streckewald, 2000). The three most used debt collection tools by data sharing of SSA are, "Tax Refund Offset [TRO] Program where SSA refers delinquent debts to Treasury; Treasury Offset Program [TOP] which expands offset to government payments other than tax refunds; and Credit Bureau Reporting where delinquent debtors are reported to Equifax and Trans Union" (Streckewald, 2000, p. 8). Data sharing guidelines are provided under the Debt Collection Improvement Act of 1996. In 1999, SSA saved about \$700 million by data sharing with other Federal and State agencies. Other Federal, State, and local agencies in 1999 saved almost \$1.5 billion (Streckewald).

## Time Series Analysis as Visualizing Change for System Enhancements

Notation of time is used to record change. Graphical presentations that record actual performances of organizations that go through changes over time represent change as being instrumental for decision making. Few (2007) stated:

Visual representations of data take advantage of the unique ability of visual perception to detect meaningful patterns that might otherwise remain hidden....Wisely used, graphical representation can be extremely effective in making large amounts of certain kinds of numerical information rapidly available to people (p.1).

Federal organizations have been given objectives and agenda items that take into consideration technological revenues that affords decision making using those advancements (Few). Quantitative data that change through time and that is recognized by oversight authorities helps to understand the context of historical performance. “It is not enough to focus on what’s happening today. We must see what’s happening in the context of history to understand it fully” (Few, 2007, p. 2).

Time series analysis affords recognition of the magnitude of change, shape of change, velocity of change, and the direction of change. Few (2007) considered:

Magnitude of change is the difference between measures of something taken at two points in time....Shape of change ...is taken by the value of something as it varies through time, moving up and down, right and left, or both....Velocity refers to the speed or rate at which changes occur....The overall or general direction of change in a series of time-series values is called the trend, which is often displayed in graph as a trend line. (pp. 5, 6)

Change is constant. Mechanisms that afford understanding or offer documentation requirement of sequences of change that aids in better decision making towards performance of federal organizations to accomplish objectives and goals should be

considered. The quantitative aspect of analysis for this study was performed by using a time series template that depicts trend and forecast models from the data. Since this study address environmental changes that can affect time series values, the intuitive approach as a qualitative method of analysis was utilized. “Subjective, or intuitive qualitative approaches, are based on the ability of the human mind to process information that, in most cases, is difficult to quantify....the historical pattern of the time series is not expected to continue into the future”(Anderson, Sweeny, & Williams, 2004, pp. 206, 207).

### Responses to the Research Questions

The responses to the research questions were obtained from public records found on the Internet. The data found from those records were used to create the Tables. The Figures that represent trend models are from a time series template created by Aczel (2006) and Sounderpandian (2006). Within the trend model,  $Z_t$  represents the variable. Time is denoted by subscript of lower case t. Year 1998 is represented by one, year 1999 is represented by 2, and so on.

#### *Question 1*

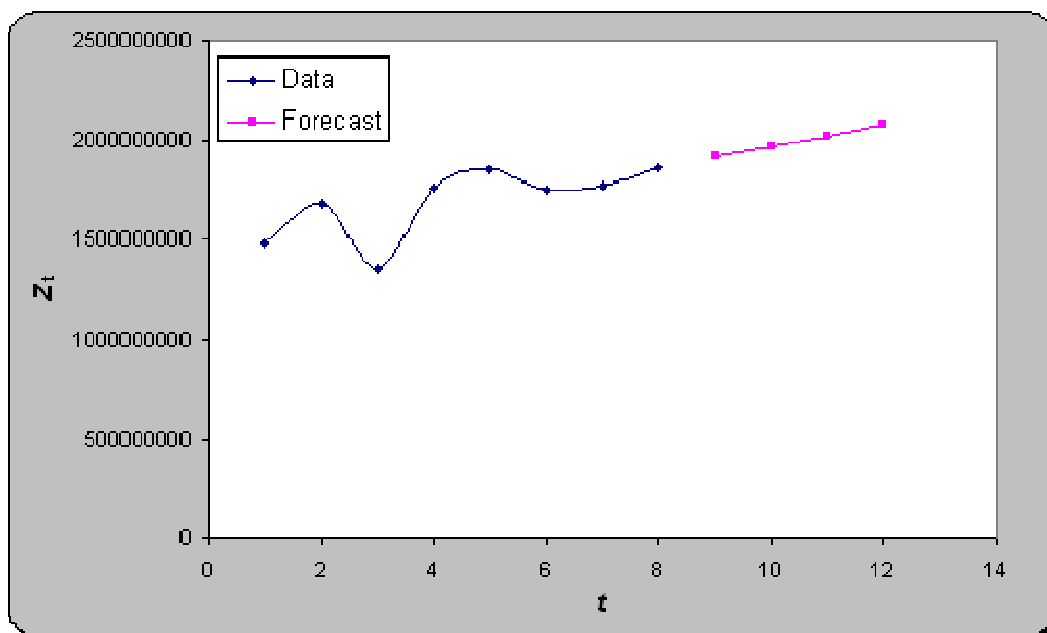
What were the overpayment amounts and trend from 1998 through 2005? Table 3 below represents the overpayment amounts (new receivables) for each of those years.

Table 3

#### *New Receivables of SSI Benefit Overpayments (In Millions)*

YEARS	OVERPAYMENT AMOUNTS
1998	\$1,485,123,256
1999	\$1,681,586,729
2000	\$1,357,459,432
2001	\$1,766,295,642
2002	\$1,852,102,709
2003	\$1,748,661,573
2004	\$1,774,633,443
2005	\$ 1,859,714,871

Figure 3 represents the trend model fluctuations for the SSI program for new receivables from years 1998 through 2005.



*Figure 3.* Overpayment Trends of the Supplemental Security Income Program 1998 through 2005.  $Z_t$  represents the variable amount of money. Time is denoted by subscript of lower case  $t$ .

*Question 2*

What technological innovations were developed to detect overpayments during the same time period and how have they improved debt collection? Table 4 below represents the eligible debt that was detected by TOP technological application for 1998 through 2005.

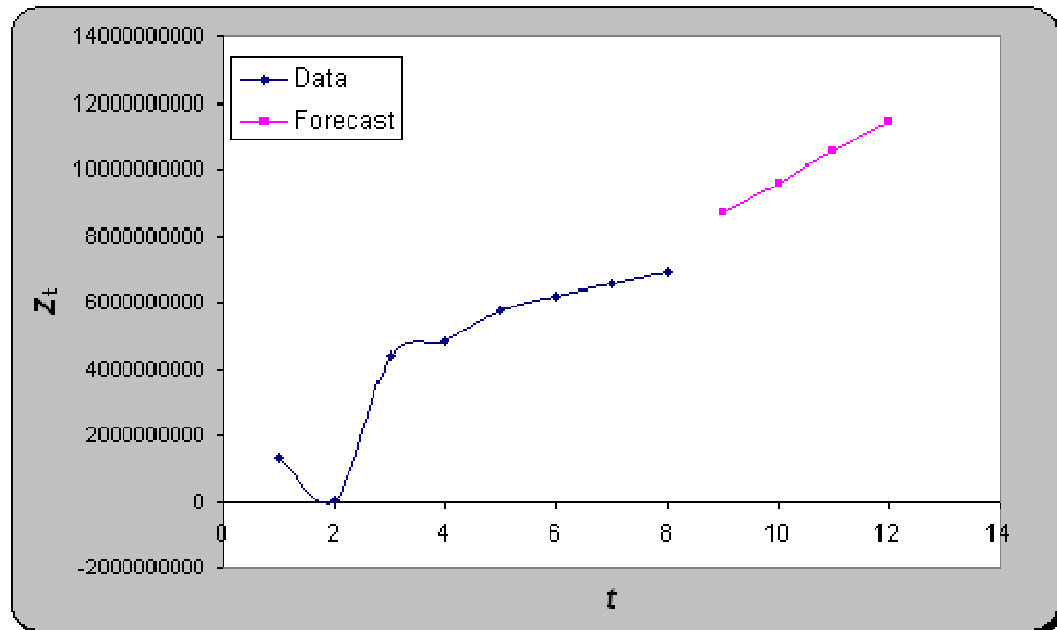
Table 4

*Eligible Debt Amounts Detected by the Treasury Offset Program (TOP) of the Supplemental Security Income Program*

YEARS	ELIGIBLE DEBT
1998	\$1,300,000,000
1999	\$37,678,537
2000	\$4,366,324,423
2001	\$4,788,187,220
2002	\$5,735,866,883
2003	\$6,176,261,641
2004	\$6,548,266,208
2005	\$6,879,000,981



The trend model in Figure 4 shows the fluctuations in the amount of eligible debt for collection by the TOP for the SSI program for years 1998 through 2005.



*Figure 4.* Eligible Debt for Collection by the Treasury Offset Program.  $Z_t$  represents the variable amount of money. Time is denoted by subscript of lower case  $t$ .

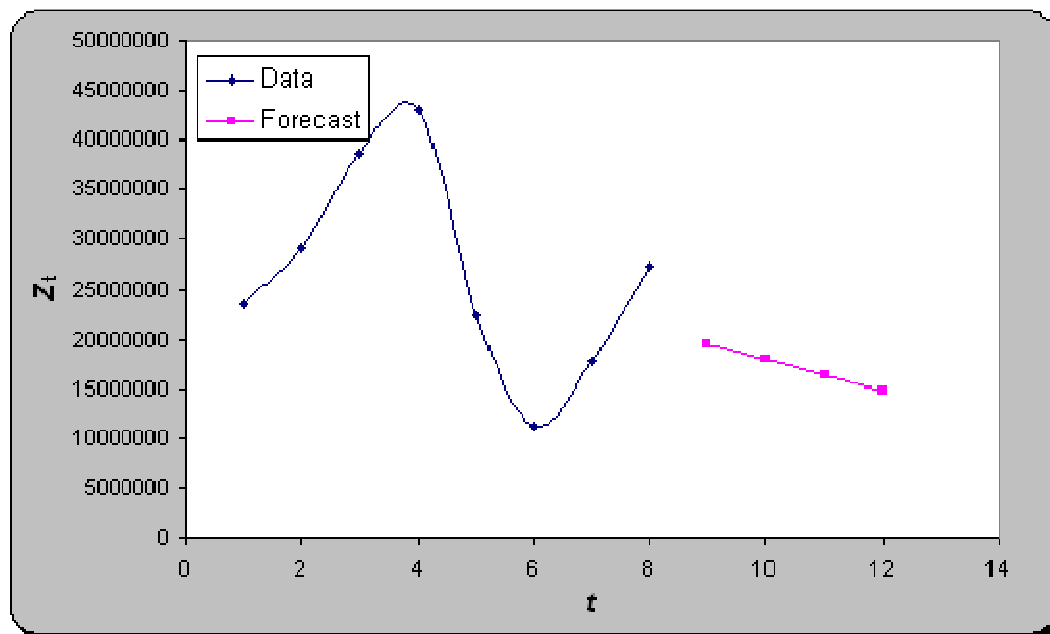
The Table 5 below describes the collection amounts of delinquent debt by the Treasury Refund Offset technological application.

Table 5

*Collection Amounts of Delinquent Debt by the Treasury Refund Offset (In Millions)*

YEARS	COLLECTION AMOUNTS
1998	\$23,500,000
1999	\$29,051,580
2000	\$38,611,736
2001	\$43,056,600
2002	\$22,293,830
2003	\$11,205,100
2004	\$17,742,786
2005	\$27,315,503

Collection amounts fluctuations for delinquent debt using the Treasury Refund Offset program technological application of the SSI program are depicted in figure 5.



*Figure 5.* Collection Amounts of Delinquent Debt by Treasury Refund Offset.

$Z_t$  represents the variable amount of money. Time is denoted by subscript of lower case  $t$ .

*Question 3*

How has workflow processes or procedures, performed by employees, addressed the feedback in the form of overpayments from SSI disability claims processing? The workflow processes or procedures are non-medical redeterminations and 18 year old redeterminations. The Table 6 below represents the amount of nonmedical redeterminations performed by employees for the various years.

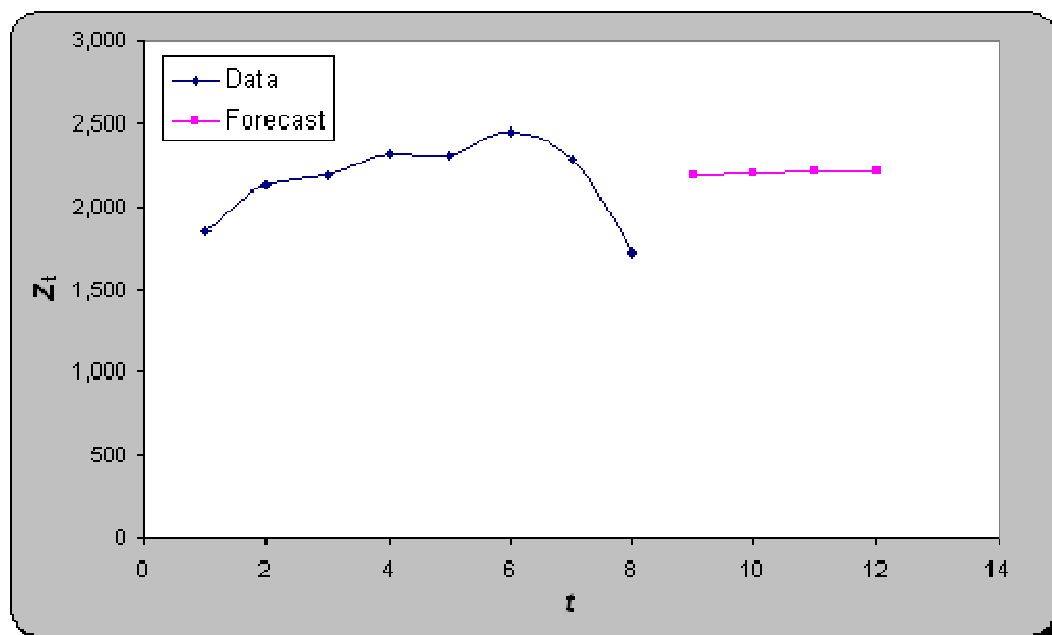
Table 6

*SSI Nonmedical Redeterminations Completed, Fiscal Years 1998 through 2005*

*(In Thousands)*

YEARS	NONMEDICAL REDETERMINATIONS
1998	1,853
1999	2,122
2000	2,182
2001	2,316
2002	2,311
2003	2,450
2004	2,279
2005	1,725

The trend model in Figure 6 shows the fluctuation of movement for nonmedical redeterminations from years 1998 through 2005.



*Figure 6.* Nonmedical Redeterminations of the Supplemental Security Income Program.

$Z_t$  represents the variable number of nonmedical redeterminations performed. Time is denoted by subscript of lower case  $t$ .

Table 7 displays the amount of initial 18 year old redeterminations performed by employees for the various years.

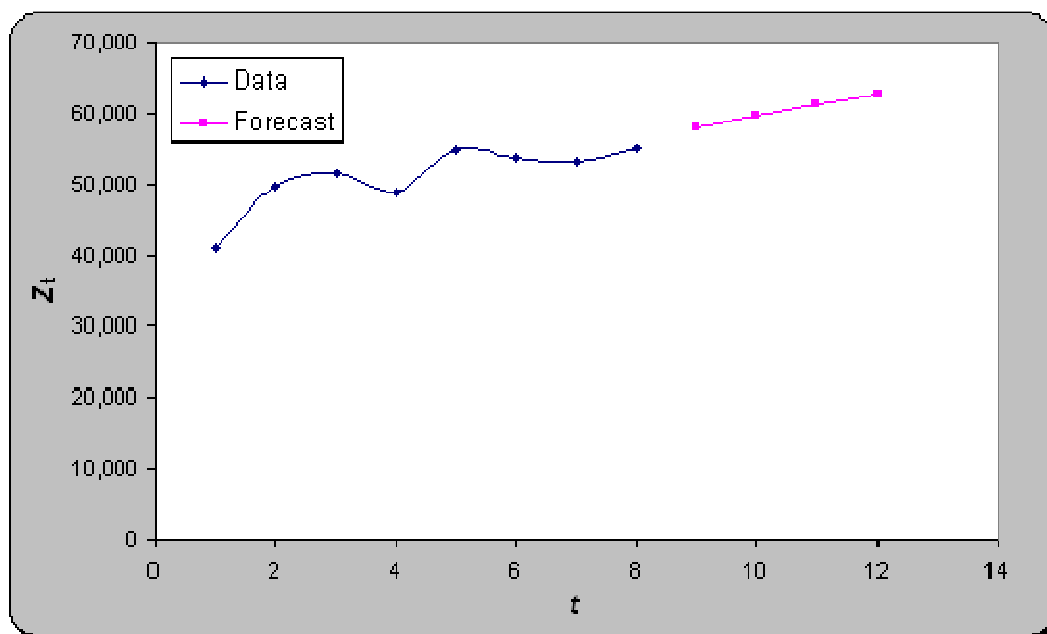
Table 7

*SSI 18 Year Old Redeterminations Initial Decisions (Medical)*

YEARS	18 YEAR OLD REDETERMINATIONS
1998	40,945
1999	49,557
2000	51,713
2001	48,944
2002	54,947
2003	53,905
2004	53,232
2005	55,331

*Note.* “Public Law 104-193 extended the requirement of redetermination of SSI eligibility to all SSI child recipients who reach age 18, with such redetermination being based on the adult eligibility criteria” (SSI, 2007, pp. 2, 3).

The trend model below is of 18 year old redeterminations performed by employees for the 1998 through 2005.



*Figure 7.* Redeterminations at age 18 of the Supplemental Security Income Program.

$Z_t$  represents the variable number of 18 year old redeterminations processed. Time is denoted by subscript of lower case  $t$ .

Table 8 lists the amounts of overpayments identified by the nonmedical redetermination process performed by employees for the years 1998 through 2005.

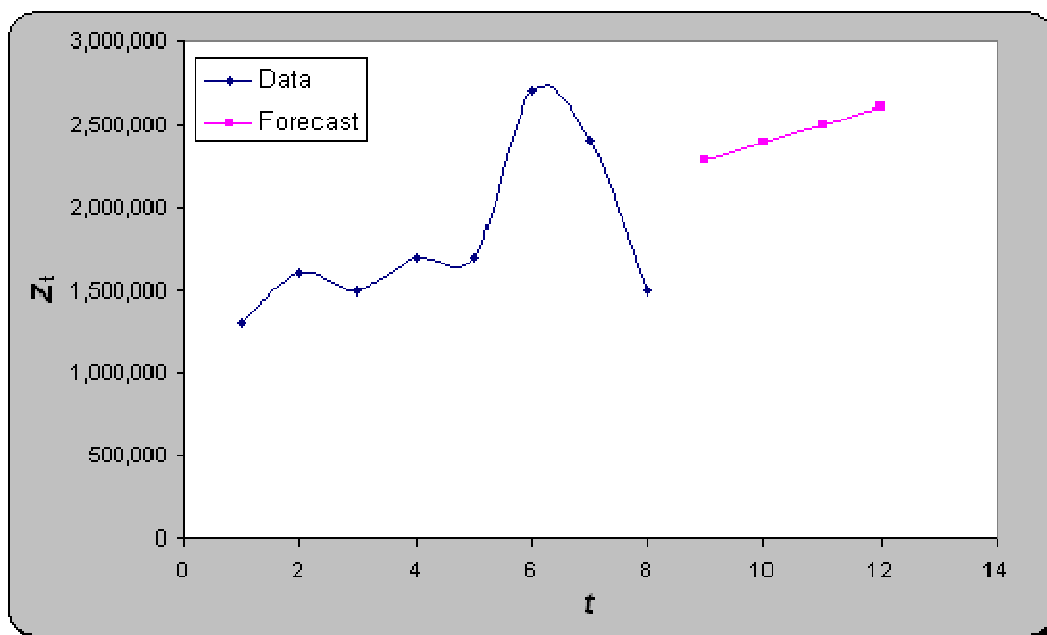
Table 8

*Supplemental Security Income Overpayments Identified Each Year From  
Nonmedical Redeterminations*

YEAR	OVERPAYMENTS IDENTIFIED
1998	\$1.3 billion
1999	\$1.6 billion
2000	\$1.5 billion
2001	\$1.7 billion
2002	\$1.7 billion
2003	\$2.7 billion
2004	\$2.4 billion
2005	\$1.5 billion



The trend model of overpayments identified by nonmedical redeterminations performed by employees is shown in Figure 8 for years 1995 through 2005.



*Figure 8.* Nonmedical Redeterminations Overpayment Amounts Identified

$Z_t$  represents the variable amount of money. Time is denoted by the subscript of lower case  $t$ .

*Question 4*

How has participation levels changed from 1998 through 2005 and how has this impacted management practices? Table 9 below lists disabled adult participation levels (allowances) for the SSI program from the years 1998 through 2005.

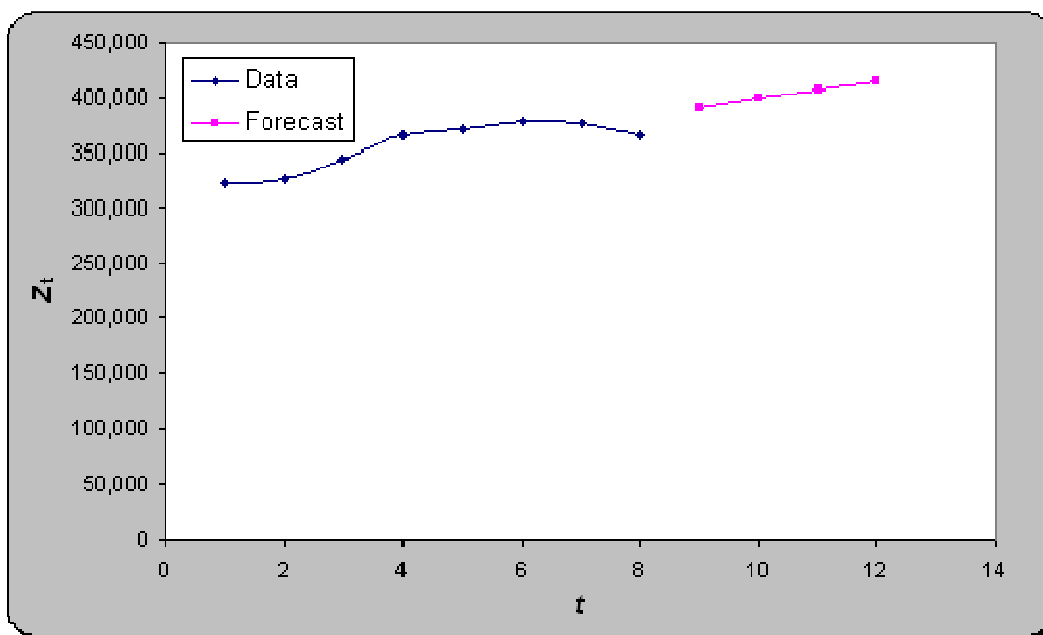
Table 9

*Disabled Adults Allowances of the SSI Program*

YEAR	ALLOWANCES
1998	332,734
1999	326,607
2000	344,163
2001	365,932
2002	371,233
2003	377,623
2004	376,224
2005	365887

*Note.* “SSI recipients are among the poorest of the poor. For them SSI is truly the program of last resort and is the safety net that protects them from complete impoverishment” (SSA, 2002, p. 3).

The trend model in Figure 9 shows the adult participant levels from years 1998 through 2005.



*Figure 9.* Disabled Adult Allowances of the Supplemental Security Income Program.

$Z_t$  represents the variable number of adult allowances processed. Time is denoted by subscript of lower case  $t$ .

Table 10 lists the disabled children (under age 18) participant levels from years 1998 through 2005.

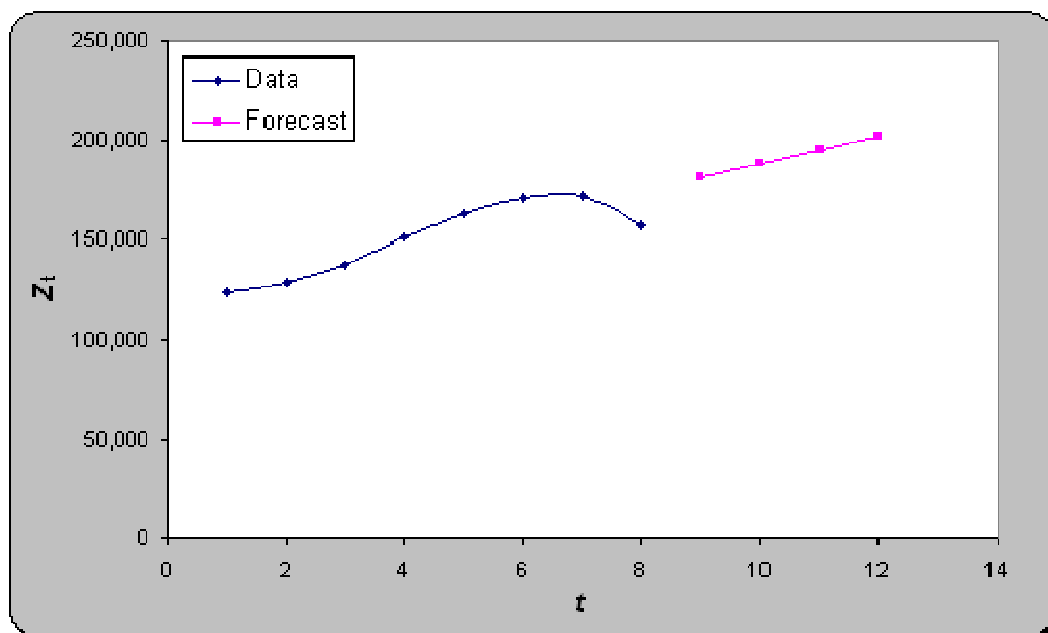
Table 10

*Disabled Children Allowances of the SSI Program*

YEARS	ALLOWANCES
1998	123,249
1999	128,543
2000	136,989
2001	151,288
2002	163,772
2003	171,531
2004	172,184
2005	157,275

*Note.* “These children are subject parent to child deeming until they reach the age of 18. At age 18 these individuals continue to be eligible for SSI if they meet the definition of blindness or disability for individuals age 18 or older and, as a result are classified as blind or disabled adults” (SSI, 2006, p. 29).

The trend model of Figure 10 shows the trend in minor children allowances for the SSI program from years 1998 through 2005.



*Figure 10.* Disabled Children Allowances of the Supplemental Security Income Program.

$Z_t$  represents the variable number of children allowances processed. Time is denoted by subscript lower case  $t$ .

*Question 5*

How have changes in management practices resulted in improved accuracy of payment for SSI disability claims? Table 11 below lists the percentages of SSI claims that were paid with no overpayments for 1998 through 2005.

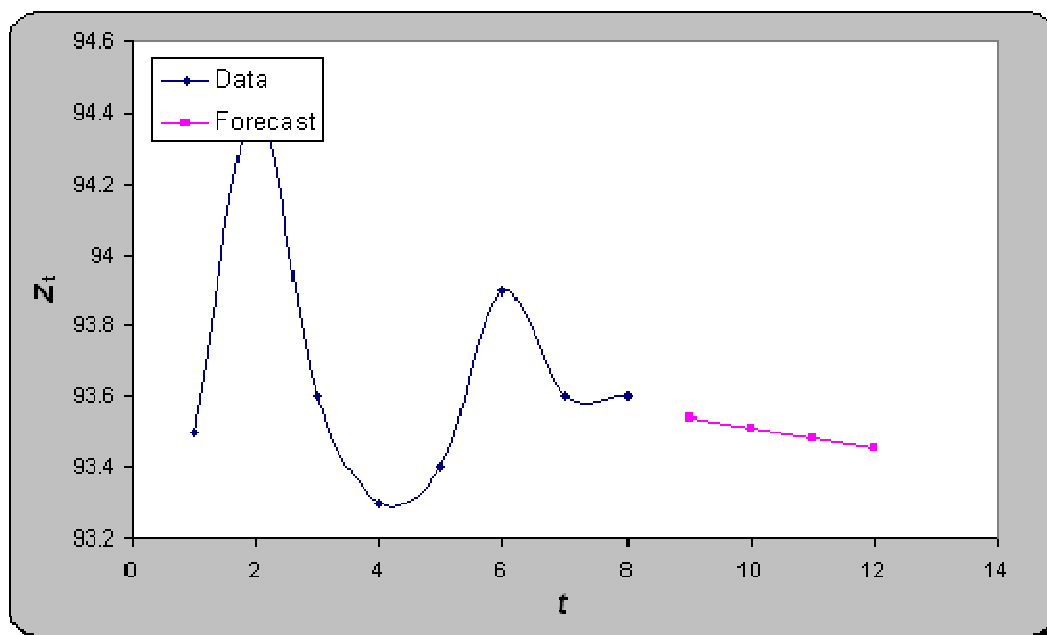
Table 11

*Percentages of SSI Payments Free of Overpayments*

YEARS	PERCENT OF SSI PAYMENTS FREE OF O/P
1998	93.5%
1999	94.4%
2000	93.6%
2001	93.3%
2002	93.4%
2003	93.9%
2004	93.6%
2005	93.6%

*Note.* “SSA is committed to further improving payment accuracy. Each 1 percent increase in payment accuracy equates to \$350 million of error prevented” (SSA, 2004a, p.101).

Figure 11 represents the trend of SSI claims paid that are without overpayments for years 1998 through 2005.



*Figure 11.* Percent of SSI Payments Free of Preventable Overpayments.  $Z_t$  represents the variable percent. Time is denoted by subscript of lower case  $t$ .

### Interpretation of Findings

To aid in the interpretation of the findings from this study, a brief overview of some of the problems that the SSI program faced prior to 1998 is required. The number of recipients between 1974 and 1996 increased from 4 million to 6.6 million. The payments of benefits increased from \$3.8 billion to about \$25 billion. SSI outstanding debt in 1997 and detected overpayments totaled \$2.6 billion. Recovery only totaled \$437 million and SSA had to write off \$562 million in overpayment debt. The remaining \$1.6 billion was found to be unrecoverable (GAO, 1998b). “When these accumulated write-offs are added to the outstanding SSI debt after collections for 1997, the actual amount of un-recovered SSI debt since 1989 exceeds \$3.4 billion”(GAO, 1998b, p. 27).

It is important for SSA to collect overpayments (GAO, 1991). The overpayments are considered a federal debt. GAO (1991) reported:

When overpayments owed the federal government are not paid or when repayment is late, the government loses the current use of such funds; the government also loses because of an increase in bad debt, resulting in additional expenses for collecting overpayments and additional interest expense for servicing the debt. In addition, when overpayments are not collected, the government may send a message to other debtors that repayment can be avoided, and consequently, fewer people may pay back voluntarily. (p. 10)

Other concerns from oversight authorities were that management of SSA lacked effective direction to protect the financial integrity of the SSI program (GAO, 1998b). Specific complaints from oversight authorities are “inadequate attention to verifying recipients’ initial and continuing eligibility for SSI benefits, a lack of priority given to recovering SSI overpayments, insufficient attention to addressing program fraud and abuse, and ineffective SSI policy development and program planning” (GAO, 1998b, p. 2).



In other words, between 1989 and 1997 the SSI program had major problems and management was not addressing them. Presented in the Table 12 below are SSI write offs from overpayments.

Table 12

*Write Offs of SSI Overpayment Debt (In Millions)*

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YEARS	AMOUNTS
1989	\$118
1990	\$112
1991	\$103
1992	\$123
1993	\$134
1994	\$185
1995	\$214
1996	\$251
1997	\$562

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Table 13 list the overpayment debt of the SSI program from years 1989 through 1997.

Table 13

*SSI Overpayment Debt and New Detected Overpayments from Years 1989 through 1997*

*(In Millions)*

YEAR	AMOUNTS
1989	\$ 1,138
1990	\$1,222
1991	\$ 1,281
1992	\$ 1,582
1993	\$ 1931
1994	\$ 1,933
1995	\$ 2,125
1996	\$ 2,338
1997	\$ 2,615

The trend models, presented above, represented a graphical presentation of change in SSI program as management addressed the dilemma of overpayments.

According to the University of Rhode Island (n.d.):

To extract the information embedded in any time-series graph, you should begin by conceptually decomposing the movement of the variables being graphed into separate components: long term trends, short term cyclical movements, seasonal patterns and unexplained fluctuations called noise. (p.1)

The fluctuations depicted in the trend models could represent noise that management of SSA created because of the attention applied to the overpayment problem of the SSI program. Tables 14 through 21 below lists the findings of overpayment and collection amounts, eligible debt, participation levels, nonmedical redetermination amounts, and percentage of payment accuracy of SSI disability claims. The amounts of those areas and whether there is an increase or decrease when compared to the previous year were indicated starting in the year 1999 to 2005. Year 1998 is the first year under study and was considered the starting point for this study.

#### *Year 1998 Interpretations*

Overpayment Amounts/Collection Amounts/Eligible Debt: Implementation of a debt collection program was authorized by the Domestic Employment Reform Act of 1994. The Act extended the Tax Refund Offset program to the SSI program for delinquent debt (SSA, 1998). Computer matching activities began with the National Directory of New Hires database and the SSI program. Many records contained wage and unemployment compensation amounts but, some of the amounts were inaccurate or not reported (Dyer, 1999). Redeterminations: SSA conducted 80,000 more non-medical redeterminations than in year 1997. Improvements were made to the redetermination process by improving

the method for selecting high error profile cases (SSA, 1999c). Participation Levels: The number of claimants decreased from 1996 level of 2.3 to 2.2 in 1997. It is projected that the level of claimants will remain level (around 2.2 %) until 2022 (Dyer, 1999). Payment Accuracy Rate: “The changes in the SSI index of dollar accuracy rate from one year to the next are not statistically significant” (SSA, 1998). Table 11 below list the findings from public records for year 1998 in each area that pertain to the research questions of this study.

Table 14

*Research Results from Public Records for Year 1998*

AREA	AMOUNTS	CHANGE
Overpayment Amount	\$1.5 (billion)	n/a
Eligible Debt	\$1.3 (billion)	n/a
Collection Amount	\$24 (million)	n/a
Nonmedical Redeterminations	\$1.3 (billion)	n/a
Adult Allowances	332,734 (thousand)	n/a
Children Allowances	123,249 (thousand)	n/a
Payment Accuracy Rate	93.5 (percent)	n/a

*Year 1999 Interpretations*

Overpayment Amounts/Eligible Debt/Collection Amounts: The Foster Care

Independence Act was signed into law in December 1999. This Act granted authority for management of SSA to use of all available debt collections tools for the recovery of SSI debts. The use of credit bureau reporting private collection agencies, interest charging, federal salary and administrative offsets were included in the tool package (SSA, 2000f). SSA also, “implemented a process to automatically transfer existing debts on closed records to new Supplemental Security records” (SSA, 1999c, p. 26). Under the Federal Financial Management Improvement Act (FFMIA) a weakness was found that pertain to the accuracy of the accounting records for the SSI program (SSA, 1999c).

Redeterminations: An increase of 219,000 high error cases was selected for field office processing (SSA, 1999c). Participation Levels: “36.5 percent of all SSI recipients also receive Social Security benefits. Most did not have any other income. For 4.5 percent of the recipients, earnings were a source of additional income, and 11.7 percent had unearned income from other sources” (SSA, 1999c p. 4). Payment Accuracy Rate: “Dollar accuracy in the SSI program has remained relatively stable over the past 4 years” (SSA, 1999c, p. 99). Table 15 below list the findings from public records for year 1999 for each area that pertain to the research questions of this study.

Table 15

*Research Results from Public Records for Year 1999*

AREAS	AMOUNTS	CHANGE
Overpayment Amounts	\$1.7 (billion)	Increase
Eligible Debt	\$38 (million)	Decrease
Collection Amounts	\$29 (million)	Increase
Nonmedical Redeterminations	\$1.6 (billion)	Increase
Adult Allowances	326,607 (thousand)	Increase
Children Allowances	128,543 (thousand)	Increase
Payment Accuracy Rate	94.4 (percent)	Increase

*Year 2000 Interpretations*

Overpayment Amounts/Eligible Debt/Collection Amounts: SSA implemented three new projects to help clear the problem with the accuracy of SSI accounting records. The three new projects, according to SSA (2000f) were:

New overpayment recovery process to automatically initiate recovery of uncollected overpayments on title XVI [SSI] beneficiary's current payment record. SSA improved financial reporting by correcting about \$120 million of uncollectible overpayments as accounts receivables. SSA implemented a new system to accurately report overpayments as accounts receivables for financial reporting. (p. 33)

The formation of Cooperative Disability Investigation (CDI) teams was to combat disability fraud. A pilot project to determine the value of real time access to wage, unemployment, and new hire information from the Federal Office of Child Support Enforcement was performed (SSA 2000f). Redeterminations: Based on a reduction in the operating plan budget less redetermination was completed than planned. Participation Levels: No significant change. Payment Accuracy Rate: Did not change in a statistically significant way from previous years. Table 16 lists the amounts for year 2000 that address the research questions for this study.

Table 16

*Research Results from Public Records for Year 2000*

AREAS	AMOUNTS	CHANGE
Overpayment Amounts	\$1.4 (billion)	Decrease
Eligible Debt	\$4.5 (billion)	Increase
Collection Amounts	\$37 (million)	Increase
Nonmedical Redeterminations	\$1.5 (billion)	Decrease
Adult Allowances	344,163 (thousand)	Increase
Children Allowances	136,989 (thousand)	Increase
Payment Accuracy Rate	93.6 (percent)	Decrease

*Year 2001 Interpretations:*

Overpayment Amounts/Eligible Debt/Collection Amounts: Continuance of all fore mentioned debt collection activities. The CDI teams showed a significant increase in the number of Office of the Inspector General investigation conducted and closed. Planning and development of two major debt collection tools (cross program recovery and administrative wage garnishment) also started in 2001. Implementation of 16 new SSI overpayment and underpayment screens for online access was installed in an effort to enhance the Modernized Supplemental Security Income Claims System (MSSICS) (SSA, 2001c). Completion of a three corrective action reviews involved.

1. Automating overpayment transfers to newly established records for recovery.
2. Recording special codes on SSRs to remove inaccurate overpayment and underpayment data from program accounting totals.
3. Implementing MOURS [Modernized Overpayment and Underpayment Reporting System] Release 1 to accurately account for and report SSI overpayments and underpayments (SSA, 2001c, p.44).

Redeterminations, “we processed more than the targeted number of redeterminations” (SSA, 2001c, p. 44). Participation Levels, “there has been substantial growth in the number of claims pending adjudication which is consistent with a longer lag time between application and the allowance process” (SSI, 2007, p. 34). Payment Accuracy Rate: The percent of SSI payments free of preventable overpayments did not change significantly. Table 17 lists the amounts of the individual areas from the research questions for year 2001.



Table 17

*Research Results from Public Records for Year 2001*

AREAS	AMOUNTS	CHANGE
Overpayment Amounts	\$1.8 (billion)	Increase
Eligible Debt	\$4.8 (billion)	Increase
Collection Amounts	\$43 (million)	Increase
Nonmedical Redeterminations	\$1.7 (billion)	Increase
Adult Allowances	365,932 (thousand)	Increase
Children Allowances	151,288 (thousand)	Increase
Payment Accuracy Rate	93.3 (percent)	Decrease

*Year 2002 Interpretations:*

Overpayment Amounts/Eligible Debt/Collection Amounts: Correction of the material weakness that pertained to the accounting of SSI debt management information about the Agency resulted in no open material weakness of the program. From the planning and developments efforts in year 2001 SSA included the “addition of three new debt collection tools to its existing debt management program to improve the Agency’s ability to collect SSI program debts. The Agency implemented mandatory cross program recovery, administrative offset and credit bureau reporting for title XVI overpayments”

(SSA, 2002b). SSA began referring SSI debt to the TOP for collection by administrative offset from other Federal payments and tax refunds. Also by 2002, seventeen CDI teams were formed and the teams prevented \$62.9 million in improper payments (SSA, 2002b). Redeterminations, “we processed more redeterminations than projected” (SSA, 2002b). Participation Levels, “historical data indicate that applications have grown fairly rapidly beginning in calendar year 2002” (SSI, 2007 p. 30). Percent of Accuracy: The percent of SSI payments free of overpayments did not change in a significant way from previous years. Table 18 list the individual amounts that pertain to the research questions for year 2002.

Table 18

*Research Results from Public Records for Year 2002*

AREAS	AMOUNTS	CHANGE
Overpayment Amounts	\$1.8 (billion)	Same
Eligible Debt	\$5.7 (billion)	Increase
Collection Amount	\$22.2 (million)	Decrease
Nonmedical Redeterminations	\$1.7 (billion)	Same
Adult Allowances	371,233 (thousand)	Increase
Children Allowances	163,772 (thousand)	Increase
Payment Accuracy Rate	93.4 (percent)	Increase

*Year 2003 Interpretations*

Overpayment Amounts/Eligible Debt/Collection Amounts: There were several activities that management of SSA performed to improve payment accuracy and integrity issues of the SSI program during 2003. Those activities, according to SSA (2003b) involved:

Systems control by “netting” of additional amounts due for some months against excess payments made for other months. Aggressively using new debt collection tools, i.e., reporting errors to credit bureaus referring debtors to the Treasury Offset Program, recovering tens of millions of dollars through recovery of SSI overpayments from OASDI benefits (cross-program recovery). Referring cases to the Agency’s OIG for prosecution or administrative sanctions. Piloting electronic verification of vital events, e.g. electronic death verification. Conducting a monthly wage reporting pilot. Exploring the feasibility of electronic verification of bank accounts. Publishing a Notice of Proposed Rulemaking for ‘administrative’ wage garnishments. (p. 41)

The SSI program was removed from GAO high risk list. SSA management efforts towards prevention, detection, and collection of overpayments were recognized.

Redeterminations: High error profile cases for nonmedical Redeterminations were increased. Targeted number of non-medical redeterminations was not meet because of a mailing problem that delayed 100,000 letters to claimants (SSA, 2003b). Participation

Levels: Same as above. Payment Accuracy Levels: Same as above. Table 19 described year 2003 amounts that pertain to the research questions.

Table 19

*Research Results from Public Records for Year 2003*

AREAS	AMOUNTS	CHANGE
Overpayment Amounts	\$1.7 (billion)	Decrease
Eligible Debt	\$6.1 (billion)	Increase
Collection Amounts	\$11.2 (million)	Decrease
Nonmedical Redeterminations	\$2.7 (billion)	Increase
Adult Allowances	377,623 (thousand)	Increase
Children Allowances	171,531 (thousand)	Increase
Payment Accuracy Rate	93.8 (percent)	Increase

*Year 2004 Interpretations:*

Overpayment Amounts/Eligible Debt/Collection Amounts: Completion of a pilot program for monthly wage reporting using touch-tone and telephone technology. A feasibility test was implemented to gauge financial organizations allowance of electronic verification of bank accounts (SSA, 2004b). Redeterminations: More redeterminations were processed earlier in the year than in previous years that resulted in overpayments. A system problem occurred causing the number of redeterminations to be incorrectly calculated. Correction was made in May, but new data could not be recalculated. The actual performance for 2004 of nonmedical redeterminations is only from May through

September. Because of budget constraints, SSA had to reduce the number of redeterminations (SSA, 2004b). Participation Levels, “reflects a projected permanent upward shift in applications due to signature proxy process” (SSI, 2007, p. 30). Payment Accuracy Rate: Same as above. The amounts are listed in Table 20 for year 2004 results of this study.

Table 20

*Research Results from Public Records for Year 2004*


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AREAS	AMOUNTS	CHANGE
Overpayment Amounts	\$1.8 (billion)	Increase
Eligible Debt	\$6.5 (billion)	Increase
Collection Amounts	\$17.7 (million)	Increase
Nonmedical Redeterminations	\$2.4 (billion)	Decrease
Adult Allowances	376,224 (thousand)	Decrease
Children Allowances	172,184 (thousand)	Increase
Payment Accuracy Rate	93.6 (percent)	Decrease

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*Year 2005 Interpretations*

Overpayment Amounts/Eligible Debt/Collection Amounts: Computer matches with the *Department of Homeland Security* for deportation information was implemented.

Identification of many more additional debtors were found to be eligible for offset against Social Security benefits. Redeterminations: Overall budget constraints caused a reduction in the amount of nonmedical redeterminations. Participation Levels: Same as above.

Payment Accuracy Level: Same as above. Table 21 lists the results from public records for year 2005.

Table 21

*Research Results from Public Records for Year 2005*

AREAS	AMOUNTS	CHANGE
Overpayment Amounts	\$1.8 (billion)	Same
Eligible Debt	\$6.9 (billion)	Increase
Collection Amounts	\$27.3 (million)	Increase
Nonmedical Redeterminations	\$1.5 (billion)	Decrease
Adult Allowances	365,887 (thousand)	Decrease
Children Allowances	157,275 (thousand)	Decrease
Payment Accuracy Rate	93.6 (percent)	Same

## SUMMARY

For this study, a trend model was used to visualize change through time of leadership efforts in strategic management, performance measurements, and accountability reporting for the SSI program. Management of SSA has developed and implemented some technological processes (treasury offset and treasury refunds) and administrative procedures (nonmedical and 18 year old redeterminations) to help ensure accuracy of payment of SSI claims and improve the integrity of the SSI program. For interpreting the results of those technological processes and administrative procedures it involved views from a systems oriented analyst prospective. There are several analytic views for organizations. According to Swanson (1994):

The power-oriented analysis will tend to focus on political strategies....The economically oriented analyst will tend to focus on strategies to optimize financial return on organizational investment....The mechanistically oriented analyst will tend to focus on strategies for getting more and more output per worker or process....The humanistically oriented analyst will tend to focus on creating harmony in the workplace and on making work life more pleasant. (p.13)

The above views offer limited or inadequate bases for problem solving for this study. Decision makers that hold these views, independently or in combination, restrict themselves to a limited set of problems and solutions (Swanson, 1994). Because of the purpose of the SSI program it is important that the output (payment of SSI claims) is accurate. The input (employees and capital) and processes and procedures (throughput) should be strategically aligned for better results in the payment of disability claims.

The theoretical aspect of this study and the systems oriented analysts view is based on open systems theory. "All the parts, or subsystems, work together to achieve the purpose of the whole organization" (Swanson, 1994, p. 13) .The technological processes

and administrative procedures that were examined in this study were viewed as homeostatic equilibrium mechanisms that were acquired by leadership of SSA for the SSI program systems survival in uncertain environments.

In chapter 5 a comparison is made between SSI procedures and processes that pertain to SSI overpayment dilemma to the homeostasis equilibrium mechanisms to systems theory. The answers to the 5 research questions are presented. How the SSI overpayment dilemma can be instrumental for organizational learning is reported. The conclusion of the study is provided and the recommendation for further study and action are described.



## CHAPTER 5: SUMMARY, CONCLUSION, IMPLICATIONS AND RECOMMENDATIONS

### Summary

The research questions were developed to explore management activities that addressed the problem of overpayments within the SSI program operations from 1998 through 2005. In 1997, the SSI program was placed on a high risk list because of management's inability to address the problem of participant's nonreporting behavior. The questions that this study were concerned with involved comparing the change in overpayment amounts to the different technological processes and administrative procedures implemented from 1998 through 2005 that management of SSA developed and implemented to address concerns from oversight authorities about improper payments resulting from program operation. Some of the goals or objectives of management of SSA were to improve reporting behavior of participants, detect and collect overpayments and improve integrity ratings of the SSI program. The five research questions for this study were:

1. What were the SSI overpayment amounts and trend from 1998 through 2005?
2. What technological innovations were developed to detect overpayments during the same time period and how have they improved debt collection?
3. How have workflow processes and procedures, performed by employees addressed the feedback in the form of overpayments from SSI disability claims processing?
4. How has participation levels changed from 1998 through 2005 and how have participation levels impacted management practices?

5. How have changes in management practices resulted in improved accuracy of payment for SSI disability claims?

### Conclusions

The fact that leadership of SSA has created and implemented technological processes and administrative procedures to address the phenomena of overpayments (feedback) of its subsystems (SSI program) is a response common to open systems theory. The response relates to the homeostasis equilibrium mechanism to open systems theory. The action from management towards SSI overpayments caused the SSI program to be removed from the GAO high risk list.

#### *Homeostasis Equilibrium Mechanisms of the SSI Program*

Homeostasis equilibrium mechanisms of open systems cause the, “tendency of a system to maintain internal stability, owing to the coordinated response of its parts to any stimulus tending to disturb its normal condition” (Aber & Melillo, 1991, p. 7). According to Berrien (1968):

When a factor is known that can shift a homeostatic state in one direction it is reasonable to look for automatic control of that factor or for a factor (or factors) which operate in the opposite direction....and may be regarded as emphasizing the confident belief that homeostasis is not accidental but is the result of organized self government and that research for the governing agencies will be rewarded by their discovery. (p. 37)

Noncompliance from participants with the reporting of changes in income, resources, and living arrangements has shifted the payment accuracy rate and has caused concern for the integrity of the SSI program. The technological processes and administrative procedures were implemented as mechanisms that operate in the opposite direction. The treasury offset program and the treasury refund program operates in opposite directions as to the

noncompliance behavior. The SSI program was rewarded with more information that could shift the payment accuracy rate and integrity ratings of the SSI program more positively.

*Question 1*

What were the SSI overpayment amounts and trend from 1998 through 2005? Prior to 1998, there was a steady increase in overpayment amounts from 1989 through 1997 (see Figure 3). From 1998 through 2005 overpayment amounts did not show a steady increase. There were fluctuations (increases and decreases) in the overpayment amounts. The increases from 1998 through 2005 did not exceed year 1997 overpayment amount (see Table 3). In conclusion, prior to 1998 management of SSA was not addressing the overpayment problem of the SSI program. Starting in 1998 management started to address the problem of SSI overpayments by implementing collection and detection procedures and applying technological applications.

*Question 2*

What technological innovations were developed to detect overpayments during the same time period and how have they improved debt collection? The Treasury Offset Program (TOP) and the Treasury Refund Offset (TRO) program were the technological innovations used to detect and collect SSI overpayments. In conclusion, prior to year 1998, management of SSA did not use the TOP and TRO program for debt detection or collection for the SSI program. The amounts detected (see Table 4) and collected (see Table 5) caused major improvements for the overpayment dilemma of the SSI program.

*Question 3*

How have workflow processes and procedures, performed by employees, addressed the feedback in the form of overpayments from SSI disability claims processing? The workflow processes that address feedback from SSI overpayments are redeterminations. There are two different procedures for redeterminations. One procedure involves review of income, resources, and living arrangements (nonmedical). The other procedure involves a disability review of 18 year olds (medical). Table 6 lists the number of nonmedical redeterminations and Table 7 lists the number of medical redeterminations. The redetermination process and procedures address the overpayment dilemma of the SSI program because “management uses the feedback as a direct link to stewardship goals” (SSA, 2004, p. 55). In conclusion, the redetermination processes supplies vital information that is used in accountability reports on a yearly basis. The redeterminations are mandatory. If participants do not keep appointment, follow up letters are sent to warn them that their benefits may be terminated if the necessary information is not received in a timely manner. SSA has several options for participant to supply the information. If participants cannot make appointments, the information can be sent through the mail. Telephone interviews can be performed. SSI employees are instructed to give the redeterminations workloads top priority.

*Question 4*

How has participation levels changed from 1998 through 2005 and how has this impacted management practices? Each fiscal year management of SSA has to make decisions about work processes based on budgetary concerns and levels of participation in its programs. For the SSI program, decisions about how many redeterminations (medical and

nonmedical) should be performed, by employees, are addressed on a yearly basis. For example, year 2003, participation levels ranked as one of the highest levels from years 1998 through 2005 (see Tables 9 & 10). Management made the decision to increase the number of medical and nonmedical redeterminations performed for that year (see Tables 6 & 7). For the same year, 2003, the overpayments identified were the highest (see Table 9). In conclusion, by year 2003 the SSI program had been on the high risk list for 7 years (1997-2003). By 2003, management had the technology and authority to aggressively improve the SSI overpayment problem. The practices and decisions that management implements have a major impact on the detection and collection of SSI program overpayments.

#### *Question 5*

How have changes in management practices resulted in improved accuracy of payment for SSI disability claims? The accuracy rate of payment of SSI claims from years 1998 through 2005 have fluctuated between 93.3% and 94.4% (see Table 11). “Each 1 percent increase in payment accuracy equates to \$350 million of error prevented” (SSA, 2004a, p.101). In conclusion, SSA is constantly challenged with improving the accuracy rate of SSI claims processing. This could be in part to not using real time data or outdated information to update records. The goal of management is to operate at 96% accuracy. From 1998 through 2005 the target goal has never been met.

#### Study Implication for Social Change

The use and reliance on information technology, administrative processes and procedures from SSA management to gather information/data for program operations has

opened new arenas for social service organizations to manage knowledge. According to

Leung (2007):

Knowledge management refers to the ability to manage ‘knowledge.’ It can be generally defined as the collection of mechanisms and processes that govern the creation, collection, storage, retrieval, dissemination and utilization of organization knowledge that help an organization to compete. (p. 183)

SSA is a, “social service organizations [that] have [sic] started to use information and communication technology for knowledge management purposes with the aim of improving service efficiency and effectiveness” (Leung, 2007, p. 181). SSA is no longer solely reliant on participant reporting behavior for program operations efficiency.

Traditional views of organizations held by theorists, like Taylor (1947) and Simon (1952) on organizations and knowledge were reported on by Harvard Business Review (1998):

As a machine for information processing...the only useful knowledge is formal and systematic—hard (read: quantifiable) data, codified procedures, universal principles. And the key metrics for measuring the value of new knowledge are similarly hard and quantifiable—increased efficiency, lower cost, improved return on invest. (p. 23)

In today's business organizations there are new and different ways of viewing knowledge usage. However, technology has created new and different ways of obtaining new knowledge for social service organizations to gather and learn from.

Management of SSA has also instituted administrative processes and procedures to further support the notion/decision of directing performances measures to receive information/data from participants. The change has demonstrated a shift towards a learning organization. A learning organization was described by Senge (2006) as places:

Where people continually expand their capacity to create the results they

truly desire, where new and expansive patterns of thinking are nurtured, where collective aspiration is set free, and where people are continually learning to see the whole (reality) together....Seeing, learning, and practicing to work with interrelations (circle of causality or 'feedback') as well as processes of change (or the time (delays) it takes for change to happen). The extent to which we seek and work with these feedbacks and delays hinges on the frames or lenses we are using to help us make sense of our realities. (p. 1)

Another theory about a learning organization is described by Gould (2000):

For an organization to survive its rate of learning must be equal to or greater than the rate of change in its external environment....The most effective insurance against being left behind by rapid technological change and a volatile economic environment is to embed within the organization processes which facilitate learning in order to keep abreast of change and to innovate. (p. 585)

A learning organization demonstrates skill in five main activities. They are, “systematic problem solving, experimentation with new approaches, learning from their own experiences and past history, learning from the experiences and best practices of others, and transferring knowledge quickly and efficiently throughout the organization” (Harvard Business Review, 1998, pp. 52, 53). To address the problems of payment accuracy and integrity issues of the SSI program, in 1998, management of SSA sought new mechanisms to obtain information/knowledge about its environment for efficient program operations and system survival. As a reward, the SSI program is still in existence for future generations of low income disabled people in the United States.

This study has described some of the uses and reliance on information technology, processes, and procedures that SSA has implemented for payment accuracy and integrity problems of the SSI program. The implication towards social change is that social service organizations are no longer dependent only on participant reporting changes in their circumstances for efficient program operations. Obtaining the right to

share information by use of technology and to develop processes and procedures by law gives social service organizations tools to enhance productivity and efficiency for program operation.

#### Recommendations for Further Actions

The fact that participant behaviors in the SSI program can represent change in social environments for social service organizations can offer indications that adjustments are needed. Fortunately, management of SSA sought, and has been granted authority, to share data/information with other Federal and State agencies as a different mechanism to obtain needed information/data for knowledge and efficiency for program operation. The next step or action could involve real time access to data/information to further reduce overpayments for the SSI program. SSAs computer matches for earned income and financial account information are from 6 to 21 months old. Overpayments can accrue during that time and collection actions cannot occur until overpayments are detected (GAO, 1998b). SSA is an organization that has adapted to changing behaviors from participants in its SSI program. Other avenues were established to obtain needed information/data for efficient system operation that improves access to crucial data and information for system survival from other organizations. According to Allee (1997):

One reason organizations are changing so much may be that the old structures simply created too many barriers to learning. Knowledge and learning want to happen. Yet, in the traditional multi-layered bureaucracy, information and knowledge does not flow freely. There are too many constraints and controls for information to move easily through organizations. (pp. 95, 96)

Views of knowledge as another system are expressed by Allee (1997). System thinking about knowledge requires the incorporation of system principles into organizational



design. One generalization about knowledge is that it is continually in motion. There are five systems principles or enabling conditions for knowledge creation or development. They are considered as the connective tissue for holding together the integrity of a system. According to Allee (1997):

Intention...is a core component of purpose, vision, and values....Successful networks have strong central core of purpose, values, and intentions.  
 Autonomy...is the ability of individuals to act independently. If people understand purpose, vision, and values, they have the foundation they need to make decisions....Fluctuation and creative chaos....stimulate interaction between the organization and the external environment. This interaction is encourage by continual dialogue, questioning, and reconsidering existing premises....Redundancy refers to intentional overlapping of information, knowledge and business activities....Requisite variety...the organization's ability to match its internal diversity to the variety and complexity of the environment in which it operates. (pp. 103, 104)

Recognition of knowledge as a system should help in supporting information exchange within the system it supports.

#### Recommendations for Further Study

The rationale behind the policy that requires 18 years olds to be responsible for repayment of overpayments from their SSI record as a minor child needs further study. Minor children that receive SSI payments are required by law to have representative payees (usually parents) that are responsible for reporting changes in income, living arrangements and resources. Failure of representative payees to report changes in income, living arrangements, and resources, in a timely manner, causes large amounts of overpayments on the child's record. Eighteen year olds that did not have control over, or the responsibility to report changes should not be held responsible for repayment of those overpayments.

The probability of collecting overpayments from representative payees for failure to report changes on minor disabled children SSI records need to be furthered studied. According to Policy Net (2003) the recipient is held responsible for repayment if the incorrect payments were used for him/her. The representative payee could be held responsible for repayment if the money was not spent on the recipient for support and maintenance or blame for the overpayment can be placed on the representative payee. If overpayments on an 18 year olds record are from nonreporting of changes in income, living arrangements, or resources from their representative payee, the payee should be liable for repayment.

Most 18 year old recipients of the SSI program quality of life are damaged because of debt owed to the Federal government from participation in the SSI program as minors. "Rules, like legislation, attempt to structure the future. By creating new conditions, eliminating existing ones, or preventing others from coming into being, rules implement legislation that seeks to improve the quality of life" (Kerwin, 1994, p. 7). Another approach for influencing child welfare policy or legislation is stated by Kufeldt, Simard, Thomas, and Vachon (2005), "if we start to focus upon what 'ought' to be provided for children, instead of what 'must not' happen to children...the legal system can begin to accommodate the goals of children's services" (p.305).

#### Closing Statements

This study was undertaken to examine the phenomena of overpayments within the SSI program. In a sense, it has also documented organizational change in obtaining crucial information/data for operational system survival. At first, this researcher approached the task by reviewing the organizational structure, mission statement,

management roles, and rules and regulations of SSA and the SSI program. The mission statement of SSA really created the fundamental theme to study management responses to the problems of overpayments and integrity issues of the SSI program for this study. The mission of SSA is, “to promote the economic security of the nation’s people through compassionate and vigilant leadership in shaping and managing America’s Social Security programs” (SSA, 1999c, p. 1). This researcher has concluded, after this research effort that the management of SSA is adhering to its mission statement.

Even though the SSI program is structured in such a way that overpayments will continue to occur in substantial amounts, having processes and procedures in place, that are fully functional to collect, detect, and prevent overpayments shows adjustments and actions towards nonreporting behavior of participants in a compassionate and vigilant manner. Technology is a mechanism that offers SSA and participants of its programs a common ground for information/data exchange by verifying past actions of changes in earned/unearned income, living arrangement and resources that are acceptable by law for accountability on both parts (organization and participant) levels. Recognition of such information from management of social service organizations and their participants creates opportunities for different societal environments (low income disabled people) to survive and improve parts of the social systems structures in the United States.

Results from this study may suggest to other government agencies that by sharing data through technological means, it may lessen office traffic and reporting requirements from program participants. Furthermore, by sharing data through technological means, it could help government agencies comply more with the Paperwork Reduction Act. If management of social service organizations (federal and state) works together, it would

facilitate another level of communication for the phenomena of system operations to occur for the betterment of the social service programs and society as a whole.

The SSI program is designed to help disabled people and in many cases it does. If the provision that make 18 year olds responsible for overpayments caused by representative payee's nonreporting behavior is rescinded, it could positively affect the generational cycle of poverty by lessening hardship for young disabled adults. SSI research and policy development division may be interested in reading this study to gain insight into low income disabled children transition into young adults.

Other organizations that have direct contact with parents and disabled children or children with special needs may also be interested in reading this study. Some examples of organizations in the Washington D.C. area are: Advocates for Justice and Education, Inc. and Community Parent Resource Center. These organizations support parents of children with special needs through advocacy, training, information, and empowerment.

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## APPENDIX A: RESEARCH REQUEST

From: Darlean King

Date: February 3, 2007

To: Washington D.C. District Manager

Subject: Permission to Conduct Research by Questionnaires

Attached please find a letter about the program I am in. The questionnaire is about Title 16 Social Insurance Specialist attitudes towards penalties and sanction usage towards preventing parental payment abuses in the Supplemental Security Income (SSI) program. Training that equips employees in the SSI units for implementation of the penalties and sanctions provisions will also be of focus. "Staff rarely uses penalties to encourage recipient compliance with reporting policies" (GAO, 2002, p.9). Title 16 unit members are being targeted because they have front line responsibility to invoke or use the penalty and sanction provisions.

The samples of possible questions for the questionnaire are: (1) What are the attitudes of Title 16 CSR's in the District of Columbia towards penalties and sanctions provisions? (2) How often have you used them in the past year? Are you aware of ways to deal with fraudulent and abusive behaviors toward parental representative payee reporting responsibilities? Are you aware of provisions that could deter fraudulent and abusive behavior from recipients that are parents? Demographic data will also be documented.

Reference: GAO Report. Supplemental security income: Status of efforts to improve overpayment detection and recovery. Retrieved from:

<http://ebsco.waldenu.edu/ehost/delivery?vid=149&sid=448cecbf-2258-46be-95c5...>



# Walden University

## Minneapolis, MN

February 2, 2007

Lorna Walters  
Supervisor of District Managers  
SOCIAL SECURITY ADMINISTRATION  
Washington, DC

Dear Ms. Walters,

Darlean King is one of my advisees in Walden University's PhD program in Applied Management and Decision Sciences. She has completed all of her course work and is now ready to undertake her final requirement that of conducting an original research study. For her dissertation, Darlean would like to address the problem of payment abuses in the SSI program. Specifically, she would like to survey a small population of Social Insurance Specialists in other DC offices to discover how they feel about penalties and sanctions as a means of preventing parental payment abuses. After analyzing her data, she would then devise some sort of "training" program to address the concerns expressed by the Specialists. Her ultimate goal would be to develop a process for reducing parental payment abuses in the future.

Walden University has very strict requirements to protect the identity of the individual participants and to assure that the data is never linked to any specific individual. Even the demographic data will be non-specific. Ms. King simply needs access to a small group of Social Insurance Specialists that are not known personally to her, so that she can collect survey data regarding their knowledge of penalties and sanctions and their attitude toward their use. I hope that you can grant her permission for her study, as it will greatly assist her in completing her degree. As an aside, you should know that Walden is a fully accredited, distance education institution with a 26-year history of providing graduate education programs for adult students that are employed full-time. Their emphasis has always been on the "practical" applications of knowledge gained and the social impact of such applications.

Thank you for your consideration.

Sincerely,

Dr. Joseph E. Barbeau  
Faculty Mentor  
2 Acorn Circle  
Kennebunk, ME 04043

APPENDIX B: RESPONSE TO RESEARCH REQUEST

**From:** Walters, Lorna  
**Sent:** Tuesday, February 27, 2007 5:57 PM  
**To:** King, Darlean  
**Subject:** Permission  
Darlean,

I am denying your request to conduct a survey of the Title 16 Claims Representatives to obtain research for the paper you are writing for your advanced degree.

As officials of the federal government we must be sure that we always consider the Standards of Conduct in the course of performing our duties. To ask other employees to fill out a survey which is not related to the work of our agency might be a violation of the Standards having to do with "Using Official Information".

There is also the matter of using agency time for non-government related business. Even if you were to ask them to do it on their own time, you could not control that they would not use duty time to complete it. They might even complain about being approached about participating.

I do not make this decision lightly as I can understand your thought that the opinions of this group would add weight to your paper, but we must, as employees of the federal government, always be mindful of how our actions are viewed by others and by the public we serve.

I appreciate that you contacted me about the matter. It is an indication to me that you take your position and duties seriously and I value that.

*Lorna Walters  
District Manager  
M St. Washington DC  
202/653-2035, ext. 3001*

APPENDIX C: CHANGE IN RESEARCH PROTOCOL

To: Lorna Walters  
District Manager

From: Darlean King

Date: November 30, 2007

Subject: Amended Research Protocol

In accordance with your denial towards permission to obtain research data from Social Security Administration employees, this letter is to inform you that all data and information for my research will be gathered from public records. As you know, Social Security Administration, the General Accounting Office, the Congress, the Social Security Advisory Board, the Office of Inspector General and other oversight authorities perform studies, inquiries, produce reports, and data about the various programs of Social Security Administration on annual bases for public information and awareness. There is a wealth of data and information available for me to continue my research effort while abiding by your decision. My committee members advised that I inform you of my adherence to your decision towards conducting my study by using public records. I appreciate your time and attention to this matter.

Sincerely,

Darlean King

From: Walters, Lorna

> Sent: Tuesday, December 18, 2007 2:49 PM

> To: King, Darlean

> Subject: RE: Research Protocol

>

> Darlean - thank you for sending the memo as directed by your committee

> members. I think this is a wonderful solution. There is the Office of

> Policy here in DC which could probably help as well. If you would

> like the name of someone there I can send you the name of a person who

> just finished a detail in this office.

>

> Good luck - Send me a copy when you are done.

>

> Lorna

>

>

> \_\_\_\_\_

> From: King, Darlean

> Sent: Tuesday, December 18, 2007 7:51 AM

> To: Walters, Lorna

> Subject: Research Protocol

>

> Good Morning, Lorna. I hope the holiday season finds you well.

> Attached please find the letter my committee members advised me to

> write to you about my research project. Thanks, Lorna and have a

> wonderful day! Darlean.

## CURRICULUM VITAE

### **Darlean Taylor-King**

Telephone: (202) 678-2655

e-mail:Darlean.King@starpower.net

#### **Education:**

Ph.D student in Applied Management Decision Science,  
Walden University, Minneapolis, Minnesota (pending)

Master of Business Administration, Averett College,  
Danville, Virginia (1993)

Bachelor of Business Administration, University of the  
District of Columbia, Washington, DC (1985)

#### **Employment History:**

Social Security Administration: Contribute to the objectives of Social Security Administration by performing individual interviews for the various programs offered by the agency to service the public with social insurance. Apply knowledge of State and Federal laws involving welfare payments, social service programs, healthcare, veteran's benefits, and others for claim processing. Use existing technology and the various computer programs to adjudicate, resolve, and develop social security disability and supplemental security income claims. (2000 to present)

Georgetown Medical Center: Researched and developed group insurance benefits and patient information. Translate medical procedures and diagnosis codes into medical data for system processing. Adherence of the rules and regulations of the healthcare industry for processing claims for the various health insurance programs. (1998-2000)

Rock Creek Cemetery: Wrote/Created a procedural manual for the various duties of the office support team. Transform legacy records into electronic format for information retrieval by employees. (1996-1998)

Blue Cross Blue Shied Health Insurance Company: Researched, reviewed, and presented information to staff and management that pertained to timely and cost effectiveness of completion of projects. Coordinate the efforts of team members and support staff to maintain performance goals of the organization. Administer the payment of claims for Federal employee health contracts. (1988-1995)