FY 2024 Special Focus Review Report Pension and Fiduciary Service Quality of Social Security Administration Income Match

STATEMENT OF PURPOSE

- The Computer Matching Agreement between the Social Security Administration (SSA) and the Department of Veterans Affairs (VA) was enhanced and reestablished in July 2022. The first batch of claims including SSA income discrepancies with VA records were distributed through the National Work Queue under end product (EP) 150.
- Pension and Fiduciary Service (P&F) conducted case reviews of the final award, post due process along with the initial EP 150 to assess whether claims processors followed proper procedures and field guidance.
- The desired outcome is to gauge the effectiveness of the field guidance provided regarding processing the SSA income matches.
- This topic was the subject of a previous Special Focused Review (SFR) completed on February 2, 2024.

METHODOLOGY

- P&F conducted this SFR from July 10, 2024, through September 30, 2024, of SSA income match claims completed by the Milwaukee Pension Management Center (PMC) and the St. Paul PMC from May 1, 2024, through June 31, 2024
- A sample of claims were reviewed to assess SSA income match claims processing accuracy and to identify trends, training needs, and opportunities for process and procedural improvements.
- Office of Performance Analysis and Integrity (PA&I) provided a random sample of 60 closed SSA income match claims. Data provided for the SFR included the following EPs:
 - 600 PMC SSA Match and EP 150 SSA Match with a special issue, Up Front Verification.
 - Completed from May 1, 2024, to June 30, 2024.
 - The initial EP 150 SSA Match was concurrently reviewed.
- One Management and Program Analyst on the P&F Quality and Oversight (Q&O) team conducted the case reviews.

- A benefit entitlement (BE) error was called if an action taken violated current regulations or other directives and affected the outcome of a claim or had the potential to affect the outcome of a claim.
- A non-benefit entitlement (Non-BE) error was called for procedural and other deficiencies that did not affect the outcome of a claim.
- Appendix A is an SFR review checklist created specifically for this SFR and was used to analyze the sample of claims.

SUMMARY OF FINDINGS

A review of the sample cases found the following related to SSA income match issues:

BE Accuracy Findings:

- 91.67% (5 errors on 5 unique cases)
 - One claim paid the claimant the increase for additional eligibility and did not use the retro to cover the debt.
 - One claim failed to count SSA income back to the correct entitlement date.
 - One claim used the incorrect SSA income and awarded the wrong rate of benefits using the Replace Gross Rate function in Veterans Benefits Management System (VBMS)-Awards without an end date which will prevent future cost of living adjustment (COLA) increases for the award.
 - One claim did not establish an EP 600 to control for Due Process.
 - One claim failed to count SSA income received as a spouse of a Veteran (dual entitlement). The claims processor only checked for SSA under the spouse's Social Security Number (SSN).

Non-BE Accuracy Findings:

- 73.33% (25 errors on 16 unique cases)
 - Seven claims did not contain the VBMS note of PENDEBTNC: <insert total debt amount>".
 - Two due process letters did not inform the claimant of all the proposed rates and previously counted VA rates and SSA income.
 - Two due process letters informed the claimant of incorrect rates and/or dates.
 - Six claims did not have the special issue "upfront verification" listed under the EP 600.
 - Three claims did not have the special issue "upfront verification" listed under the EP 150.
 - Two claims did not have an award letter in VBMS.

- One claim had an award letter with incorrect income and rates listed.
- One claim had an award letter that did not inform the claimant of all income rates used in the decision of the award.
- One due process letter failed to include the correct SSA income under dual entitlement.

Overall Accuracy Findings:

- o 66.67% (based on 20 unique claims with errors)¹
 - 73.33% (based on 16 unique claims with errors) overall accuracy based on SSA Income Match related errors only.

Root Cause Analysis

The primary source of the errors was misapplication of the instructions provided to the field. Specifically, claims processors failed to issue proper due process to include a listing of all proposed rates, previously counted VA rates and SSA income. Additionally, claims processors failed to consistently use all required claim attributes.

Considering the 91.67 percent BE accuracy and that the overall accuracy rate of the SSA Income Match related errors increased from 51.67 percent on the last SFR to 73.33 percent on this SFR, a follow-up SFR is not recommended.

See Appendix B, C and D for a copy of the field instructions.

RECOMMENDATIONS

1. Share the SFR findings with the PMCs. Target completion date is November 30, 2024.

The expected outcome of this recommendation is to improve the accuracy of SSA income match claims. No additional approvals or collaboration outside of P&F are required to implement the recommendations.

ACTIONS TAKEN

1. Created a SFR review checklist specifically to analyze the sample of claims.

2. Returned the reviewed claims requiring a correction to the field on October 3, 2024.

¹ One claim contains one BE error and two Non-BE errors

APPENDICES

Appendix A. SFR Review Checklist



Appendix B. SSA Income Match Job Aid



SSA Income Match Interim Procedures -

Appendix C. SSA Debt Frequently Asked Questions



SSA Debt Frequently Asked Qı

Appendix D. SSA Income Match Guidance Email



SSA Income Match Guidance Email.pdf