

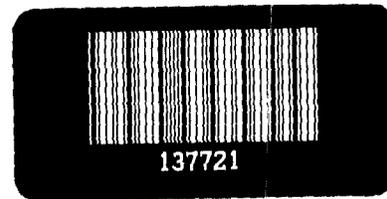
GAO

United States General Accounting Office  
Report to Congressional Committees

January 1989

# MEDICAID

## Some Recipients Neglect to Report U.S. Savings Bond Holdings



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**Human Resources Division****B-232864****January 18, 1989****The Honorable Lloyd Bentsen  
Chairman, Committee on Finance  
United States Senate****The Honorable Henry A. Waxman  
Chairman, Subcommittee on Health  
and the Environment  
Committee on Energy and Commerce  
House of Representatives**

In examining the reporting of income and assets by Medicaid recipients in nursing homes, we discovered that federal and state agencies cannot verify all of the U.S. savings bond holdings of applicants for Medicaid and other welfare programs. As this situation relates directly to the integrity of the Medicaid program, we are bringing it to the attention of your committees.

The Social Security Act (at 42 U.S.C. 1320b-7) requires state agencies that administer Medicaid, Aid to Families With Dependent Children (AFDC), Food Stamps, and certain other federal benefit programs to have an Income and Eligibility Verification System (IEVS). The law requires that the income verification process include comparing the income declared by program applicants and beneficiaries with information obtained from the Internal Revenue Service (IRS) and the Social Security Administration. Information available from these agencies includes data on interest earned on redeemed savings bonds and on bonds paying periodic interest. It does not, however, include the value of U.S. savings bond holdings. Such information is maintained by the Department of the Treasury and is not currently available to the states.

**Results in Brief**

In a limited test in Massachusetts, we identified 143 Medicaid nursing home residents whose individual bond holdings could render them ineligible for Medicaid benefits. Their combined outstanding bond holdings totaled about \$1.5 million. Most of the holdings were not reported on the individuals' Medicaid applications.

To help prevent ineligible individuals from obtaining Medicaid benefits, we believe that the Congress should require that (1) procedures for verifying savings bond holdings be included in IEVS and (2) the Secretary of the Treasury, upon request, make such information available to the states.

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## Background

Medicaid is a federally aided, state-administered medical assistance program that serves needy people. It became effective on January 1, 1966, under title XIX of the Social Security Act (42 U.S.C. 1396). The Health Care Financing Administration (HCFA), within the Department of Health and Human Services (HHS), has overall responsibility for administering the Medicaid program at the federal level.

The federal government currently provides from 50 to 79 percent of Medicaid expenditures for health services, depending on a state's per capita income. For fiscal year 1986, Medicaid expenditures were estimated at \$44.9 billion; the state and federal shares were estimated at \$20.2 billion and \$24.7 billion, respectively. The estimated federal share of Medicaid payments for nursing home care in fiscal year 1986 was about \$6.9 billion.

Generally, persons receiving cash assistance under the AFDC and Supplemental Security Income (SSI) programs are eligible for Medicaid assistance. Such persons are referred to as the categorically needy. Also, states can extend Medicaid coverage to the medically needy—people who meet the eligibility requirements for AFDC or SSI except for the income limits and who have relatively large medical bills.

Individuals are ineligible for Medicaid if they have income and assets, including cash or other liquid assets or property other than personal residences and automobiles, above state-specified levels either for cash assistance under AFDC or SSI or for assistance as medically needy. Among the assets that determine an individual's eligibility are U.S. savings bonds. Individuals with savings bond holdings above the state asset limits for AFDC, SSI, and Medicaid are ineligible.

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## Objectives, Scope, and Methodology

In our ongoing review of Medicaid program issues, we evaluated how U.S. savings bond holdings of Medicaid applicants are determined during the eligibility process. Our objectives were to (1) identify and assess the effectiveness of states' policies and procedures for verifying savings bond holdings and (2) determine the extent of savings bond holdings by Medicaid recipients residing in Massachusetts nursing homes.

We did our work at the state Medicaid agency in Boston; HCFA's headquarters in Baltimore, and its regional office in Boston; and the Department of the Treasury's Savings Bond Operations Office in Parkersburg, West Virginia.

To assess the effectiveness of states' efforts to verify savings bond holdings, we

- reviewed applicable federal and state laws, regulations, and procedures relating to Medicaid eligibility and the matching of Medicaid records and records of other federal programs to verify eligibility and
- discussed current procedures for savings bond verification with HCFA and Massachusetts Medicaid officials.

At our request, Treasury matched a file of 29,213 Massachusetts Medicaid-supported nursing home residents<sup>1</sup> as of December 31, 1984, with its savings bond files<sup>2</sup> as of April 1986, to identify recipients who owned or had redeemed savings bonds. For recipients with outstanding bonds valued at \$2,000 or more, we did a further analysis to determine the extent to which the bonds were purchased between the date of the Medicaid file and the date of the Treasury file. (See p. 4.) For these individuals, we extracted social security numbers from the Medicaid file and provided them on tape to Treasury's Savings Bond Operations Office. For a sample of 60 individuals with bond holdings of \$2,000 or more, selected in part randomly and in part to emphasize the recipients with the highest value of bond holdings, we reviewed Medicaid records to determine if the bond holdings and redemptions were reported on their Medicaid applications.

We did not evaluate the internal controls in the Massachusetts automated systems used to produce the Medicaid nursing home file. However, we were able to verify portions of the tape data for the 60 cases included in our manual review of Medicaid applications. Similarly, we did not evaluate the internal controls in the automated systems Treasury uses to monitor savings bond activity and perform data matches. However, we did verify certain matches to microfilm copies of savings bond registration records.

Our work was done between January 1986 and May 1987 in accordance with generally accepted government auditing standards.

<sup>1</sup>The file represented 80 percent of Massachusetts Medicaid nursing home residents as of that date.

<sup>2</sup>Treasury's current files include only savings bonds purchased or redeemed after January 1, 1974, when Treasury began tracking bond holdings using social security numbers.

## Some Massachusetts Medicaid Nursing Home Residents Have Undisclosed Savings Bonds

To be eligible for Medicaid in Massachusetts, individuals cannot have assets, other than their principal residence and automobile, valued at \$2,000 or more. Of the 29,213 Medicaid nursing home residents in Massachusetts as of December 31, 1984, all of whose records we matched with U.S. Treasury records, 143 had savings bond holdings exceeding the \$2,000 limit as of April 1986. The 143 nursing home residents had outstanding bonds worth about \$1.5 million, with individual holdings ranging from \$2,000 to over \$60,000 (see table 1).

**Table 1: Savings Bond Holdings of Massachusetts Medicaid Nursing Home Residents With \$2,000 or More in Bonds (1984)**

Range	Number	Total value
\$ 2,000-\$4,999	69	\$213,842
5,000-9,999	28	203,946
10,000-19,999	26	349,419
20,000-29,999	9	221,474
30,000-39,999	4	136,600
40,000-49,999	4	169,422
More than 50,000	3	179,641
<b>Total</b>	<b>143</b>	<b>\$1,474,344</b>

Of the approximately \$1.5 million in outstanding bonds, all but about \$23,000 were purchased before January 1985. Further, of the \$23,000 in bonds purchased after December 1984, about \$12,500 were purchased by or for two recipients who were in nursing homes when the bonds were purchased. For the remaining \$10,500 in bonds purchased by 11 individuals after December 1984, we did not attempt to determine whether the recipients were still in nursing homes at the time the bonds were purchased, but checked instead to see whether the recipients' bond holdings as of December 1984 were \$2,000 or more. For 8 of the 11 recipients, bond holdings were over \$2,000 at that time.

Another 262 Medicaid recipients had redeemed \$2,000 or more in bonds, or had a combination of outstanding and redeemed bonds totaling \$2,000 or more, with outstanding bonds of less than \$2,000. We could not readily determine when the bonds were redeemed or how the cash from the redeemed bonds was disposed of. If the cash was disposed of within 2 years of obtaining Medicaid eligibility, the disposition could render the individual ineligible for Medicaid. Other individuals may have assets that, when combined with savings bond holdings, could render Medicaid recipients with undisclosed bond holdings of less than \$2,000 ineligible for Medicaid.

## Most Bond Holdings Not Reported

Individuals applying for Medicaid are required to disclose all assets and income on their initial application. Annually thereafter, Medicaid agencies conduct redeterminations to verify continued eligibility. The recipients also must account for any assets disposed of during the 2 years immediately preceding their Medicaid application. Failure to disclose all assets can render the individual ineligible for Medicaid.

The application form used in Massachusetts specifically asks recipients to list government notes/bonds. To determine the extent to which Medicaid recipients indicated bond ownership or recent redemption, we reviewed applications for 60 of the 405 who owned (143) and/or had redeemed (262) bonds totaling \$2,000 or more. Of the 57 records that Massachusetts Medicaid officials were able to locate, 8 were for individuals who had redeemed their bonds more than 2 years before applying for Medicaid and therefore did not have to disclose bond ownership. Of the 49 records for which disclosure should have been made, 48 did not indicate any savings bond holdings or redemptions, and 1 identified some but not all of the bond holdings. Consequently, the 49 individuals could be declared ineligible for filing a false or incomplete Medicaid application.

HCFA and Massachusetts officials agreed that the bond holdings and redemptions identified in our match could affect Medicaid eligibility and expressed interest in the 405 individuals with outstanding and/or redeemed bonds in excess of \$2,000. Treasury cannot, however, release the identity of the 405 people because of restrictions contained in the Privacy Act of 1974 on release of personal data. GAO also is bound by law to maintain the confidentiality of this information.<sup>3</sup>

<sup>3</sup>The Privacy Act of 1974 generally prohibits federal agencies from disclosing personal information they maintain about individuals. There are, however, certain exceptions that constitute permissible disclosures—e.g., to another federal agency, upon request, for a civil or criminal law enforcement purpose; for routine uses (i.e., uses compatible with the purpose for which the record was collected) agencies establish; to the Congress; and to GAO in the course of the performance of its duties.

Although the Privacy Act permits disclosure of personal data to another government agency for a civil or criminal law enforcement activity, Treasury advised us in April 1987 that it does not believe it is authorized to disclose "unspecified" records, such as those of the 405 individuals, to HCFA under the law enforcement provisions. After careful consideration of the matter, GAO reached the same conclusion. Since our discussions with Treasury, the Congress enacted the Computer Matching and Privacy Protection Act of 1988 (Public Law 100-503). It amends the Privacy Act by providing a statutory basis for computer matching programs between government agencies if certain conditions are met, e.g., if there is a written agreement between the agencies and notice is published in the Federal Register. Prior to this act, matching programs were specifically authorized only in OMB guidelines implementing the Privacy Act.

To obtain the information, HCFA or Massachusetts would have to establish a computer matching program with Treasury in accordance with Office of Management and Budget guidelines and the Computer Matching and Privacy Protection Act of 1988, or IEVS would have to be expanded to give states access to data on the value of savings bond holdings.

## **IEVS Does Not Enable States to Verify Bond Holdings**

The Congress imposed the IEVS requirement to help ensure that federally funded public assistance and unemployment agencies make more accurate eligibility determinations and benefit payments. As a result, the agencies now exchange information with each other and obtain unearned income data from IRS and other income and wage data from the Social Security Administration and from state wage and unemployment insurance benefit data files.

State Medicaid agencies use certain federal information available under IEVS to check the accuracy of declared financial resources. Earnings and pension data are verified with the Social Security Administration, and unearned income data, such as interest and dividends, are verified with IRS. Information on interest earned on redeemed bonds and on bonds paying periodic interest can be verified with IRS. States do not, however, currently have access to the information they need to verify individual savings bond holdings. Without access to savings bond data files maintained by the Department of the Treasury, Massachusetts officials told us they cannot determine whether applicants for public assistance programs have unreported savings bond holdings.

Including savings bond holdings under IEVS would take advantage of existing verification programs. The Social Security Act (at 42 U.S.C. 1320b-7) requires Medicaid agencies to independently verify unearned income information when there is an apparent discrepancy between information reported from various sources and information reported to the state agency by the applicant or recipient. Starting with data from IEVS, a caseworker would determine actual circumstances and decide whether to take adverse action. This helps state agencies ensure that notices of adverse action are based on appropriate information. Because caseworkers already evaluate other information on the applicant, the primary administrative cost incurred would be for developing computer software programs to extract data from Treasury files.

The Social Security Act provides various safeguards to protect Medicaid applicants and recipients from improper use of information obtained

through IEVS. It requires agencies to independently verify certain information and to provide individuals with an opportunity to contest findings that might affect eligibility (42 U.S.C. 1320b-7(c)). The act also requires applicants and recipients to be notified at the time of application, and periodically thereafter, that information available through IEVS will be requested and utilized.

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## Conclusions

States lack adequate information to ensure that applicants for and recipients of public assistance accurately report U.S. savings bond holdings and redemptions. Our work in Massachusetts showed that the potential exists for individuals with extensive bond holdings to improperly establish Medicaid eligibility. Although IEVS includes various mechanisms for verifying income and eligibility information, it does not provide a mechanism for obtaining information needed to verify the savings bond holdings of applicants for public assistance.

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## Recommendation

We recommend that your committees report to the Congress a legislative proposal to amend the IEVS requirements to expand information available to the states under IEVS to include data files maintained by the Department of the Treasury on U.S. savings bond holdings and redemptions. Appendix I contains suggested legislative changes.

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## Agency Comments and Our Evaluation

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### Commonwealth of Massachusetts Comments

The Commonwealth of Massachusetts said that it would welcome efforts by the federal government to improve its ability to make eligibility determinations for its Medicaid program (see app. II). Massachusetts noted, however, the need for safeguards to protect the confidentiality of public and private records, in the event that IEVS is expanded.

We believe one advantage of making data on savings bond holdings available through an expansion of IEVS is that extensive safeguards are already in place to protect the confidentiality of records.

**HHS Comments**

HHS agreed that states lack a mechanism to ensure that savings bond holdings and redemptions are properly considered in the eligibility process (see app. III). HHS added that HCFA has worked with the Massachusetts Medicaid agency in an unsuccessful attempt to obtain savings bond data from Treasury. HHS said that it agrees with Treasury that the release of savings bond data raises significant policy issues and that additional supporting legislation would enable Treasury to make information available for computer matches.

**Treasury Comments**

The Department of the Treasury had not provided formal comments at the time this report was finalized. The Department's Bureau of Public Debt told us, however, that it supports in principle the establishment of a mechanism to assure that individuals applying for or receiving federal benefits are qualified to receive them. However, the Bureau considered it premature to formally support the draft legislative proposals because of certain concerns, discussed below, relating to the matching process, including verification of computer match data, accuracy of savings bond records, and Privacy Act considerations.

**Operational Impact**

The Bureau of Public Debt expressed concern about the large volume of records (28-34 million) that would be processed against its savings bond files and the cost to conduct what it estimates could exceed 100,000 microfilm searches to verify ownership.

We do not believe that the burden of computer matches and microfilm searches is as severe as the Bureau suggests. The number of records to be processed and searches to be conducted should be far fewer than the Bureau estimates. We do not believe that savings bond ownership needs to be verified during every annual eligibility redetermination. We envision a one-time pass against the savings bond file for current recipients, and then matches only for new applicants after that. When caseworkers discuss the computer match results with recipients, most situations should be resolved without a microfilm search. Searches would be required only when significant bond holdings are identified and the recipient denies ownership. The deterrent effect should also be recognized—that is, the likely effect of reducing the inclination by some applicants to inappropriately deny bond ownership.

**Accuracy and Verification of Savings Bond Records**

The Bureau of Public Debt expressed concern for Treasury's potential liability under the Privacy Act if improper determinations were made

because of "inaccurate" data. The Bureau stated that savings bond records are sufficiently accurate for the purposes for which they were established, but may not be accurate enough for making determinations of eligibility for benefit programs. The Bureau also was concerned that data from computer matches would be used to deny benefits without adequate verification.

The Privacy Act requires a federal agency, before disseminating any record to anyone other than another federal agency, to make reasonable efforts to assure the records are accurate "for agency purposes." The act does not place any further burden on an agency to ensure accuracy. Further, the Office of Personnel Management's Privacy Act guidelines reiterate that "[w]hile the Act recognizes that an agency cannot guarantee the absolute accuracy of its systems of records, any record disclosed to a person outside the agency . . . must be as accurate as appropriate for purposes of the agency which maintained the record." 40 Fed. Reg. 28,965 (1975).

Section 1137(c) of the Social Security Act (42 U.S.C. 1320b-7(c)) provides protection against use of inaccurate information. Paragraph (1), which we suggested amending to cover savings bond record disclosures, would require information released by Treasury to be independently verified by the appropriate agency before it terminates, denies, suspends, or reduces anyone's benefits. Paragraph (2) provides further protection to anyone whose benefits are threatened by requiring the appropriate agency to notify such individual of its findings and to give that individual an opportunity to contest them. Additionally, the recently enacted Computer Matching and Privacy Protection Act of 1988 requires independent verification of information and notice of and an opportunity to contest adverse findings. With these protections, the likelihood of an improper determination resulting from a Treasury disclosure is minimal, as is Treasury's potential liability.

### Ownership of Savings Bonds

The Bureau of Public Debt said that savings bond records may not be accurate enough for making eligibility determinations because the social security numbers may be of someone other than the first owner, particularly for gift bonds. The Bureau stated that because savings bond ownership is determined under Treasury regulations issued under federal law, courts have ruled that these regulations take precedence over state laws. The Bureau is concerned that states will make improper ownership determinations.

As previously discussed, eligibility determinations would not be made without verification of ownership. State Medicaid agencies, in accordance with federal Medicaid regulations, currently define asset ownership for the purpose of determining Medicaid eligibility. Federal regulations define savings bond ownership as it applies to applicants for and recipients of Medicaid benefits. Massachusetts Medicaid regulations are very specific with respect to savings bond ownership. Accordingly, improper ownership determinations are unlikely.

#### Sanctions for Improper Disclosure

The Bureau of Public Debt expressed concern over the lack of sanctions for improper disclosure of savings bond ownership records by states. The Bureau discussed the possible need for it to have authority to impose sanctions for such disclosures. In principle, we are not opposed to the Bureau gaining such authority. We note, however, that some protection against disclosure does exist.

Although IEVS does not provide for sanctions, it does provide protection against unauthorized disclosure. The Social Security Act (at 42 U.S.C. 1320b-7(a)(5)) requires states to incorporate adequate safeguards to ensure that information exchanged by state agencies is made available only to the extent necessary to assist in valid administrative needs of the program and information is adequately protected against unauthorized disclosure.

#### Authority to Issue Regulations

The Bureau of Public Debt said that our legislative proposal does not give Treasury the authority it would need to issue regulations and procedures to assure an orderly process.

If the legislation we are recommending were enacted, the Treasury Secretary would be required to make savings bond records available for income and eligibility verification purposes. The Secretary would have authority to issue any necessary regulations under 31 U.S.C. 321(b)(1), which provides that "[t]he Secretary may prescribe regulations to carry out the duties and powers of the Secretary."

In summary, we believe the concerns expressed by the Bureau of Public Debt have been adequately addressed under the IEVS program and our legislative proposal.

Copies of this report are being sent to the Secretary of Health and Human Services, the Secretary of the Treasury, the Director of the Office of Management and Budget, and the House and Senate committees and subcommittees having legislative and appropriation responsibilities for matters discussed in this report. We also will make copies available to others on request.

*Lawrence H. Thompson*

Lawrence H. Thompson  
Assistant Comptroller General

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Table 1: Savings Bond Holdings of Massachusetts  
Medicaid Nursing Home Residents With \$2,000 or  
More in Bonds

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## Abbreviations

AFDC	Aid to Families With Dependent Children
DEFRA	Deficit Reduction Act of 1984
GAO	General Accounting Office
HCFA	Health Care Financing Administration
HHS	Department of Health and Human Services
IEVS	Income and Eligibility Verification System
IRS	Internal Revenue Service
SSI	Supplemental Security Income



# Suggested Legislation

To expand the Income and Eligibility Verification System to give states access to information on applicants' bond holdings and redemptions, we suggest the following legislative changes:

- Amend section 1137(a)(2) of the Social Security Act (42 U.S.C. 1320b-7(a)(2)) by adding the following after "section 6103(1)(7) of Title 26," "and information from the Department of the Treasury pursuant to section 3121 of Title 31 relating to holdings and redemptions of savings bonds".
- Amend section 1137(a)(5)(B) of the Social Security Act (42 U.S.C. 1320b-7(a)(5)(B)) by adding the following after "section 6103(1) of Title 26": "and section 3121 of Title 31".
- Amend section 1137(c)(1) of the Social Security Act (42 U.S.C. 1320b-7(c)(1)) by adding the following after "section 6103(1)(7)(B) of Title 26": "or section 3121 of Title 31".
- Amend section 3121 of United States Code Title 31 by adding the following new subsection "(i)": "(i) For the purpose of income and eligibility verification, the Secretary of the Treasury shall, upon written request from an appropriate official, disclose information relating to savings bond holdings and redemptions to any Federal, State, or local agency administering a program listed in subsection (b) of section 1137 of the Social Security Act (42 U.S.C. 1320b-7(b))."

# Comments From the Commonwealth of Massachusetts



The Commonwealth of Massachusetts

Executive Office of Human Services

One Ashburton Place, Room 1109

Boston, Massachusetts 02108

MICHAEL S. DUKAKIS  
GOVERNOR  
PHILIP W. JOHNSTON  
SECRETARY

October 26, 1988

Lawrence H. Thompson, Assistant Comptroller General  
United States General Accounting Office  
General Accounting Office  
Human Resources Division  
Washington, D.C. 20548

Dear Mr. Thompson:

Governor Dukakis has asked me to respond to your office's proposed report regarding the relationship of individuals' bond income and Medicaid eligibility.

Thank you for sharing a copy of the draft report with the Commonwealth of Massachusetts. Please be assured that we would welcome efforts by the federal government -- administrative, regulatory, and/or statutory -- which would enable the Commonwealth to further improve on our ability to make Medicaid eligibility determinations appropriately. In the event that the federal government opts to pursue legislative initiatives to expand information available to the states under the income and eligibility verification system (IEVS) to determine Medicaid eligibility for individuals, we would encourage members of the Congress to incorporate stringent safeguards to protect the confidentiality of public and private records.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip W. Johnston".

Philip W. Johnston  
Secretary

# Comments From the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Washington, D.C. 20201

OCT 6 1988

Mr. Lawrence H. Thompson  
Assistant Comptroller General  
U.S. General Accounting Office  
Washington, D.C. 20548

Dear Mr. Thompson:

Enclosed are the Department's comments on your draft report, "Medicaid: Some Recipients Neglect to Report U.S. Savings Bond Holdings." The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

The Department appreciates the opportunity to comment on this draft report before its publication.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "R. P. Kusserow".

Richard P. Kusserow  
Inspector General

Enclosure

**Appendix III  
Comments From the Department of Health  
and Human Services**

**Comments of the Department of Health and Human Services  
on the General Accounting Office Draft Report,  
"Some Recipients Neglect to Report U.S. Savings Bond Holdings"**

GAO's draft report discusses the need to expand the information available to States under the Income Eligibility Verification System (IEVS) to include data on U.S. savings bond holdings of Medicaid and other welfare recipients. In a limited test in Massachusetts, GAO identified 143 Medicaid nursing home residents whose individual bond holdings could render them ineligible for Medicaid benefits. Their combined outstanding bond holdings totaled about \$1.5 million. Most of the holdings were not reported on the individuals' Medicaid applications. To help prevent ineligible individuals from obtaining Medicaid benefits, GAO believes that the Congress should require that procedures for verifying savings bond holdings be included in the IEVS.

HCFA has been actively involved in exploring avenues for verifying holdings and redemptions of U.S. savings bonds by Medicaid applicants and recipients that may affect their eligibility. We agree with the GAO conclusion that States lack a mechanism to ensure that savings bond holdings and redemptions are properly considered in the eligibility process.

HCFA has worked with the Massachusetts State agency in efforts to obtain savings bond data from the Treasury Department. These efforts have been to no avail. The Treasury Department indicated that such computer matches raised significant policy issues that require resolution by the Bureau of Public Debt. It believes and we agree that additional supporting legislation would enable them to make available information for the computer matches.

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# Major Contributors to This Report

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