United States General Accounting Office

GAO

Report to the Chairman, Subcommittee on Social Security, Committee on Ways and Means, House of Representatives

September 2000

SOCIAL SECURITY ADMINISTRATION

Longstanding Problems in SSA's Letters to the Public Need to Be Fixed

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GAO/HEHS-00-179

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Abbreviations

HHS	Department of Health and Human Services
SSA	Social Security Administration
SSI	Supplemental Security Income

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United States General Accounting Office
Washington, D.C. 20548

Health, Education, and
Human Services Division

B-284086

September 26, 2000

The Honorable E. Clay Shaw
Chairman, Subcommittee on Social Security
Committee on Ways and Means
House of Representatives

Dear Mr. Chairman:

The Old Age and Survivors Insurance and Disability Insurance programs, commonly referred to as Social Security, and the Supplemental Security Income (SSI) program provide monthly cash benefits to about 50 million beneficiaries. The Social Security Administration (SSA), which administers both programs, mails millions of letters each year to notify Social Security and SSI applicants and recipients about its decisions regarding their eligibility to receive benefits or changes in the amount of their benefits—important issues that have a bearing on their everyday lives. Because these letters serve as SSA's official means of communicating this information to the public, it is important that they be clearly written and easy to understand. If they are not clear, the public may miss important information about their eligibility, the continuation of their payments, or the recourse available to them if they disagree with SSA's decisions.

We have long been critical of SSA's letters. For example, in 1994, we reported that many SSA letters, particularly those dealing with Social Security overpayments, were difficult to understand.[1] Specifically, we found that SSA's letters excluded essential details needed to understand its decisions, presented information in an illogical order, and required complex analyses to reconstruct how SSA had made adjustments to benefit payments. To help you assess SSA's progress in improving its letters, you asked us to provide updated information on their quality. This report addresses (1) the problems that make SSA's letters difficult to understand and (2) the status of SSA's actions to fix the problems.

To address these issues, we interviewed SSA officials responsible for improving SSA's letters and reviewed documents on past and current

[1] *Social Security Administration: Many Letters Difficult to Understand* (GAO/T-HEHS-94-126, Mar. 22, 1994).

evaluations of the agency's letters and its initiatives to improve them. We focused our review on four categories of automated letters—Social Security award letters, SSI award letters, Social Security benefit adjustment letters, and SSI benefit adjustment letters—because these letters reach a large number of people and convey important information on their eligibility for benefits or changes in their benefit amounts that can significantly affect their lives.[2] SSA mails about 14.2 million of these letters each year. We used writing consultants to help us develop criteria to assess whether the letters communicated clearly and to verify our assessment of the types of problems that occur. To quantify the frequency of the problems we found in Social Security and SSI benefit adjustment letters, we reviewed a statistical sample of 1 day's production of letters. For Social Security and SSI award letters, we identified specific problems with the letters and obtained information from SSA about the number or percentage of letters that included problems we identified. We conducted our work between June 1999 and July 2000 in accordance with generally accepted government auditing standards. For more details about our scope and methodology, see appendix I.

Results in Brief

The majority of letters in each of the four categories we reviewed did not clearly communicate at least one of the following key points: (1) SSA's decision (that is, the action SSA was taking on a claim that prompted the agency to send the letter), (2) the basis for SSA's decision, (3) the financial effect of SSA's decision on the person addressed in the letter, or (4) the recourse the person could take in response to SSA's decision. The lack of clarity was caused by one or more problems, such as illogically sequenced information, incomplete or missing explanations, contradictory information, and confusing numerical information. An unclear explanation of the basis for SSA's decision was the most widespread problem among the four categories of letters. For example, it was difficult to understand the basis for SSA's decision in SSI award letters because the letters did not explain the relationship between program rules and the amount of the SSI benefit. Finally, a subgroup of SSI award letters—those sent to about 13 to

[2]SSA characterizes its letters as automated or manual. SSA considers a letter automated if its personnel input transaction data, such as a death or earnings report, and SSA's systems generate the letter without any other human intervention. If SSA personnel were involved in selecting paragraphs or providing individualized data, then SSA considers the letter to have been manually prepared.

15 percent of SSI awardees who are eligible for previous but not a future month's benefits—were unclear in communicating all four key points.

SSA acknowledges that these letters contain the problems we identified; however, for many of the problems, the agency has not taken any corrective action. Many of the problems we identified are not amenable to quick fixes but, rather, will require a comprehensive revision of the language used in the letters and rewriting the agency's software applications that generate them. The agency has repeatedly rescheduled plans to make comprehensive changes to its Social Security benefit adjustment letters because of competing demands for computer systems resources; the agency allocated resources to other priorities, such as making computer system changes that resulted from legislation. Recently, however, the agency announced plans to make significant changes to this category of letter, but few details are yet available. Major improvements to SSI letters were also delayed, but in this case SSA was waiting for resolution of a nationwide court case involving these letters. In September 1999, a federal court ordered SSA to develop and implement a plan to improve its SSI letters, prompting SSA to begin a major, multiyear initiative to improve its SSI award and benefit adjustment letters. This initiative is still in the early phase.

Overall, SSA has not placed a high priority on improving its letters to the public, and it will be years before the improvements are completed to most of these letters, even if there are no more delays and SSA adheres to its current plans. Because of past delays to letter improvement initiatives, we are recommending that SSA develop performance measures to monitor the agency's progress in making the necessary comprehensive improvements to these letters.

Background

The Social Security program and the SSI program provide monthly cash benefits to persons who meet the programs' eligibility requirements. In fiscal year 1999, 38 million persons received a total of $332.4 billion in Old Age and Survivors Insurance benefits, 6.5 million persons received $50.4 billion in Disability Insurance benefits, and 6.6 million persons received $28.1 billion in SSI benefits. The rules affecting eligibility and benefit amounts in these programs can be complex. Once individuals are determined to be eligible for Social Security or SSI benefits, changes in their circumstances, such as changes in the amount of their income, disability, or marital status, can affect their continuing eligibility for

benefits or the amount of their benefits.[3] When SSA learns of these changes—either through its own review processes or from individuals reporting changes in their circumstances to the agency—SSA adjusts individuals' eligibility status or benefit amounts accordingly.

The Social Security programs provide protection to insured workers and their dependents against the loss of earnings because of workers' retirement, disability, and death. The monthly cash benefits, which are intended to replace a portion of lost earnings, are financed through payroll taxes. The monthly benefit amount to which workers (and their dependents) are entitled is based on workers' lifetime earnings covered by Social Security. Individuals can begin receiving partial retirement benefits due them at age 62, or they can receive full benefits beginning at full retirement age, which is currently age 65. In addition, some individuals continue to work after they start receiving benefits. SSA continues to credit these earnings to the individuals' Social Security accounts, and their monthly benefits may increase as a result. However, once individuals receive retirement benefits, an earnings limit applies to persons who have retired and are younger than full retirement age. If earnings exceed established limits, SSA reduces the benefit amount. To determine whether and by how much to reduce benefit amounts, SSA requests individuals to provide estimates of their annual earnings. If their actual earnings are less than they estimated, SSA will have underpaid them and will need to adjust their payments. Monthly benefits paid to workers who retired before reaching full retirement age and their dependents are reduced by $1 for every $2 earned over the $10,080 annual limit for 2000.[4] For individuals receiving Social Security benefits based on disability, different rules govern subsequent earnings. During a trial work period, no earnings limit applies to disabled workers. But disabled workers who have completed the trial work period generally stop receiving benefits if their monthly earnings continue to exceed $700 as of 1999. For all these reasons, a person's earnings after he or she becomes disabled or retires before the full retirement age can result in overpayments, underpayments, or both.

[3]Our review did not include letters sent to persons whose benefits were terminated because they had been determined to be no longer disabled.

[4]In 1999, an earnings limit also applied to retired workers aged 65 to 69 and their dependents. Benefits were reduced by $1 for every $3 over $15,500. On April 7, 2000, Public Law 106-182, the Senior Citizens' Freedom to Work Act of 2000, eliminated the earnings limit for retired workers between full retirement age and age 70, effective January 1, 2000.

SSI, in contrast, is a means-tested program funded from general tax revenues designed to provide a minimum level of income to individuals with limited income and resources who are 65 or older or blind or disabled, including children. To qualify for benefits, individuals must have income and resources below the SSI program's limits. Qualified recipients receive monthly cash payments sufficient to raise their income to the level guaranteed by the federal SSI program. The amount of the SSI benefit varies according to income. Persons who have no income receive the maximum federal SSI benefit—currently $512 per month for an individual and $769 for a couple.[5] SSI recipients with income, including those receiving Social Security benefits, receive less.

Letters are one of SSA's primary means of communicating with the public. SSA estimates that each year it issues approximately 250 million letters and forms to the public, including claimants, workers, employers, and government agencies. These letters deal with a wide range of issues. SSA sends letters to Social Security and SSI applicants and recipients notifying them about their eligibility for benefits or changes in their eligibility or benefit amounts. SSA sends annual statements to Social Security beneficiaries documenting, for tax purposes, the amount of Social Security benefits received; annual estimates to current workers of future Social Security benefits; letters to employers about workers' Social Security numbers; letters to SSI recipients verifying, for other means-tested programs, the amount of their SSI benefits; and many other types of letters.[6] SSA has pledged to the public that its letters will clearly explain the agency's decisions so that the public can understand how and why SSA made them and what to do if it disagrees.

Responsibility for improving letters is shared among various SSA offices, including the office responsible for customer service, which helps identify problems, and the program offices, which are responsible for further analyzing problems and drafting revised language. The Office of Systems,

[5]States have the option of supplementing the federal SSI benefit with state payments. Forty-four states provide such a supplement to at least some SSI recipients.

[6]In 1996, we reviewed SSA's statements estimating current workers' future Social Security benefits based on their earnings. We identified problems that made the statements difficult to understand and recommended that SSA make several improvements to them. (See *SSA Benefit Statements: Well Received by the Public but Difficult to Comprehend* (GAO/HEHS-97-19, Dec. 5, 1996).) SSA subsequently revised the statements, consistent with our recommendations. We found the revised statements to be much improved. (See *Social Security: Providing Useful Information to the Public* (GAO/T-HEHS-00-01, Apr. 11, 2000).)

however, plays a key role because implementing changes often requires systems programmers to rewrite one of the multiple software applications that SSA uses to generate letters. SSA's Social Security program is currently supported by a new, redesigned system and about 25 separate systems applications, each dedicated to processing a specific type of transaction. SSA has one application that, among other transactions, processes claims for benefits and generates automated eligibility award or denial letters; another application processes transactions such as reports of work-related earnings and generates automated benefit adjustment letters. For the SSI program, the agency has one major system to process transactions for the program and produce automated SSI letters. Each software application has its own programmed logic to generate letters and its own language database. Depending on the particulars of the transaction, each application is programmed to select appropriate paragraphs from among the numerous paragraphs in its language database, many of which were written to be used in multiple situations. Once the paragraphs are selected, the software is programmed to complete paragraphs by filling in case-specific information from SSA's master records and sequence paragraphs to assemble letters. These master records contain account data for every beneficiary.

Problems in SSA's Letters Limit Their Understandability

Many of the letters in our review do not meet the agency's own communication standard or generally accepted principles of good communication. Social Security award letters, Social Security benefit adjustment letters, SSI award letters, and SSI benefit adjustment letters do not clearly communicate one or more of the following key points: SSA's decision (that is, the action SSA is taking on a claim that necessitated the letter), the basis for its decision (that is, the program rules and facts on which SSA based its decision), the financial effect of its decision on payments to the individual, and the recourse the individual has in response to SSA's decision. In addition, a subgroup of SSI award letters—those sent to about 13 to 15 percent of awardees who were found eligible for benefits for previous but not future months—were especially difficult to understand. These letters had problems that made it difficult to understand each of the four key points. The unclear communication in the four categories of letters we reviewed was caused by many of the same problems we identified in SSA's letters in 1994, such as illogically sequenced information, incomplete or missing explanations, contradictory information, and confusing numerical information.

Table 1 presents what we consider to be the most significant problems because of their frequency or their potential to adversely affect the individuals receiving the letters.

Table 1: The Most Significant Problems in Four Categories of SSA Letters and Their Estimated Frequency

Key point	Social Security letter		SSI letter	
	Award	Benefit adjustment	Award	Benefit adjustment
Decision		80% of cover sheets do not include all decisions that affect payments		
Basis for decision		100% illogically sequence explanations of SSA's decisions	100% do not explain relationship between program rules and benefit amounts	86% do not clearly explain relationship between program rules and changes in benefit amounts
Financial effect		86% lack clear explanations of adjustments		55% lack clear statement of timing or amount of change in benefits or other problems
Recourse	95% do not state how to appeal	24% do not fully state options for repaying overpayments or how to appeal		

Note: The percentages for the Social Security and SSI award letters are based on information that SSA provided to quantify the frequency of the problems we found with these letters. The percentages for the Social Security and SSI benefit adjustment letters are based on the sample of letters we reviewed.

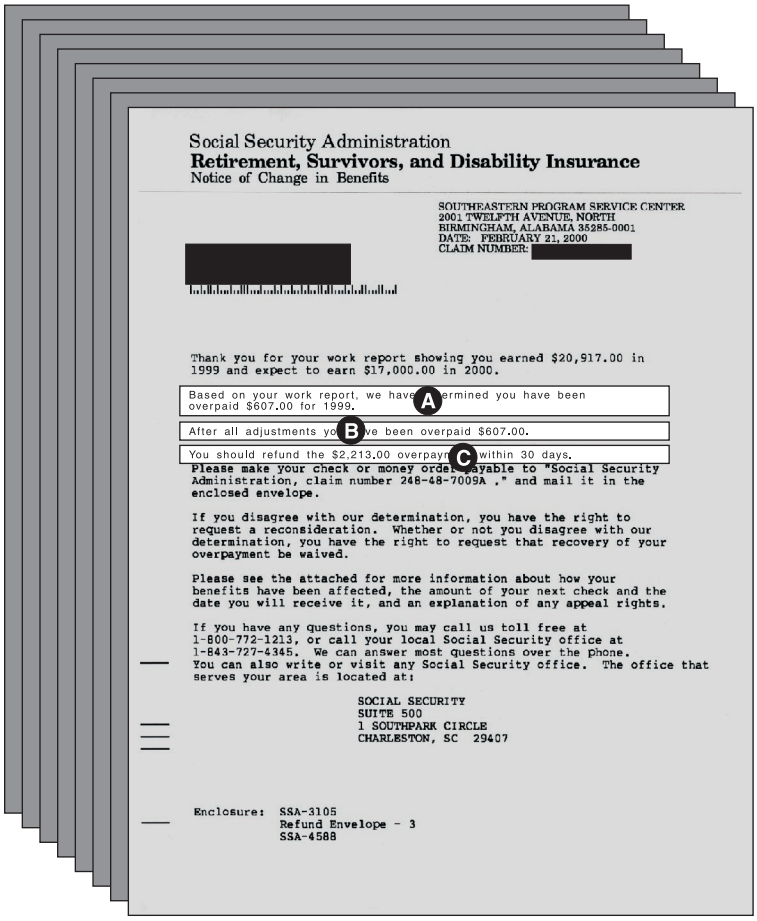
Some SSA Decisions Can Be Difficult to Understand Because of Incomplete Information

SSA's decision to award benefits or to adjust the amount of individuals' benefits was generally stated clearly in three of the four categories of letters. However, letters sent to inform Social Security beneficiaries of adjustments in their benefit amounts were not clear. In most of these letters, information necessary to understand SSA's decisions was buried in the letters' attachments or was not mentioned at all.

Most letters adjusting Social Security benefits consist of a cover sheet acknowledging earnings that individuals recently reported to SSA and sometimes a lengthy attachment. Information about possible changes in payments are detailed in the attachment and in worksheets that are often a part of the attachment. SSA's decision was unclear in 80 percent of the letters we sampled, most often because the cover sheets did not disclose all decisions discussed in the attachments. In these situations, the attachment may have also discussed other decisions SSA made about (1) amounts it

had overpaid or underpaid individuals or (2) its plans to withhold payments to recover amounts overpaid or both. For example, one cover sheet informed a beneficiary that she had been overpaid $607 but requested that she repay $2,213 (see fig. 1). This could confuse the reader until she read the attachment, which explained SSA's plans to also recover a prior overpayment. The explanation of the difference between the $607 overpayment and the $2,213 to be repaid was not given until later in the attachment.

Figure 1: A Social Security Benefit Adjustment Letter in Which SSA's Decision Is Unclear



Social Security Administration
Retirement, Survivors, and Disability Insurance
Notice of Change in Benefits

SOUTHEASTERN PROGRAM SERVICE CENTER
2001 TWELFTH AVENUE, NORTH
BIRMINGHAM, ALABAMA 35285-0001
DATE: FEBRUARY 21, 2000
CLAIM NUMBER: [redacted]

[redacted]

Thank you for your work report showing you earned $20,917.00 in 1999 and expect to earn $17,000.00 in 2000.

Based on your work report, we have determined you have been overpaid $607.00 for 1999. (A)

After all adjustments you have been overpaid $607.00. (B)

You should refund the $2,213.00 overpayment within 30 days. (C)

Please make your check or money order payable to "Social Security Administration, claim number 248-48-7009A ," and mail it in the enclosed envelope.

If you disagree with our determination, you have the right to request a reconsideration. Whether or not you disagree with our determination, you have the right to request that recovery of your overpayment be waived.

Please see the attached for more information about how your benefits have been affected, the amount of your next check and the date you will receive it, and an explanation of any appeal rights.

If you have any questions, you may call us toll free at 1-800-772-1213, or call your local Social Security office at 1-843-727-4345. We can answer most questions over the phone. You can also write or visit any Social Security office. The office that serves your area is located at:

SOCIAL SECURITY
SUITE 500
1 SOUTHPARK CIRCLE
CHARLESTON, SC 29407

Enclosure: SSA-3105
Refund Envelope - 3
SSA-4588

(A) Based on your work report, we have determined you have been overpaid $607.00 for 1999.

(B) After all adjustments you have been overpaid $607.00.

(C) You should refund the $2,213.00 overpayment within 30 days.

In some cases, however, the attachment did not explain the decision stated in the cover letter. We found a case in which the cover sheet informed an individual that (1) on the basis of his work report, SSA had determined that he had been overpaid $2,083.00 but that (2) after all adjustments, he had been overpaid $2,055.00, and (3) he should refund the $2,009.50 overpayment within 30 days. In this case, the attachment did not explain these differences.

Our finding is similar to one included in a 1992 study done under contract for SSA that cited cover sheets as not disclosing all essential actions addressed in attachments.[7] Such letters could conceivably cause the persons receiving them to call or visit SSA offices for explanations. This creates additional work for SSA employees that would not have been necessary had the letters completely and clearly stated all decisions up front.

The Basis for Most SSA Decisions Is Difficult to Understand Because of Multiple Problems

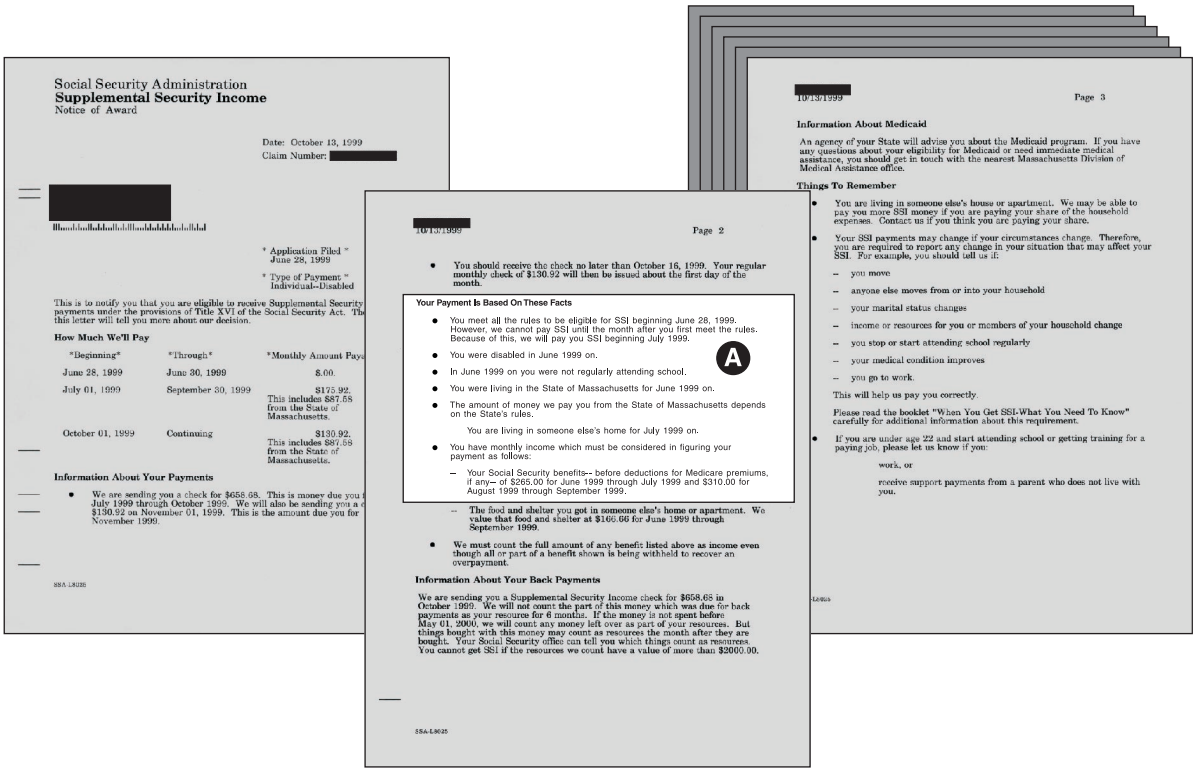
The basis for SSA's decisions—that is, the program rules and facts on which SSA based its decisions—was usually clear in the Social Security award letters but unclear in the three other categories of letters. In some cases, the basis for SSA's decisions was not clear because the rules were explained in complex language that was difficult to follow, or the rules were presented in an illogical order scattered throughout the letters. In other cases, the program rules or facts on which the decisions were based were not fully explained, and the relationship between an individual's income and adjustments to benefits could not be easily understood. SSA officials acknowledged that the latter situation occurs in all SSI award letters. In our review of SSI award letters, we found that these letters do not clearly show how income affects the amount of the SSI benefit, and the information provided on an individual's benefit amount and income is not organized in a way that enables the reader to easily understand the connection between the two. Given this limitation, the basis for SSA's decisions can be difficult to understand, even in a relatively simple award letter.

It is even more difficult to understand the basis for SSA's decisions when an individual is to be awarded several months' past due benefits and the benefit amount changes during the months covered by the award letter. An

[7]QS & A Research & Strategy, *Comprehension of Two Notices: Overpayment Notice and Due Process Notice* (Fairfax, Va.: Dec. 17, 1992).

award letter to a disabled individual illustrates this point. In October 1999, SSA notified an SSI applicant that she had been eligible for monthly benefits of $175.92 for July through September 1999 and $130.92 for October and November 1999. This information was presented on the first page of the letter. The facts on which SSA based the benefit amount—including the amount of her income—are described separately on the letter's second page (see fig. 2). It was not clear from the facts as presented on that page—which was the only explanation SSA gave for its decision in this letter—why this individual's benefits were reduced. No explanation was given for the change in the benefit amount for October and November 1999.

Figure 2: An SSI Award Letter in Which the Basis for SSA's Decision Is Unclear



Social Security Administration
Supplemental Security Income
Notice of Award

Date: October 13, 1999
Claim Number: [redacted]

[redacted]

* Application Filed *
June 28, 1999

* Type of Payment *
Individual--Disabled

This is to notify you that you are eligible to receive Supplemental Security payments under the provisions of Title XVI of the Social Security Act. Th this letter will tell you more about our decision.

How Much We'll Pay

Beginning	*Through*	*Monthly Amount Pays
June 28, 1999	June 30, 1999	$.00.
July 01, 1999	September 30, 1999	$175.92. This includes $87.58 from the State of Massachusetts.
October 01, 1999	Continuing	$130.92. This includes $87.58 from the State of Massachusetts.

Information About Your Payments

- We are sending you a check for $658.68. This is money due you f July 1999 through October 1999. We will also be sending you a c $130.92 on November 01, 1999. This is the amount due you for November 1999.

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- You should receive the check no later than October 16, 1999. Your regular monthly check of $130.92 will then be issued about the first day of the month.

Your Payment Is Based On These Facts

- You meet all the rules to be eligible for SSI beginning June 28, 1999. However, we cannot pay SSI until the month after you first meet the rules. Because of this, we will pay you SSI beginning July 1999.
- You were disabled in June 1999 on.
- In June 1999 on you were not regularly attending school.
- You were living in the State of Massachusetts for June 1999 on.
- The amount of money we pay you from the State of Massachusetts depends on the State's rules.

  You are living in someone else's home for July 1999 on.
- You have monthly income which must be considered in figuring your payment as follows:
  - Your Social Security benefits-- before deductions for Medicare premiums, if any-- of $265.00 for June 1999 through July 1999 and $310.00 for August 1999 through September 1999.
  - The food and shelter you got in someone else's home or apartment. We value that food and shelter at $166.66 for June 1999 through September 1999.
- We must count the full amount of any benefit listed above as income even though all or part of a benefit shown is being withheld to recover an overpayment.

Information About Your Back Payments

We are sending you a Supplemental Security Income check for $658.68 in October 1999. We will not count the part of this money which was due for back payments as your resource for 6 months. If the money is not spent before May 01, 2000, we will count any money left over as part of your resources. But things bought with this money may count as resources the month after they are bought. Your Social Security office can tell you which things count as resources. You cannot get SSI if the resources we count have a value of more than $2000.00.

SSA-L8025

[redacted] 10/13/1999 Page 3

Information About Medicaid

An agency of your State will advise you about the Medicaid program. If you have any questions about your eligibility for Medicaid or need immediate medical assistance, you should get in touch with the nearest Massachusetts Division of Medical Assistance office.

Things To Remember

- You are living in someone else's house or apartment. We may be able to pay you more SSI money if you are paying your share of the household expenses. Contact us if you think you are paying your share.
- Your SSI payments may change if your circumstances change. Therefore, you are required to report any change in your situation that may affect your SSI. For example, you should tell us if:
  - you move
  - anyone else moves from or into your household
  - your marital status changes
  - income or resources for you or members of your household change
  - you stop or start attending school regularly
  - your medical condition improves
  - you go to work.

  This will help us pay you correctly.

  Please read the booklet "When You Get SSI-What You Need To Know" carefully for additional information about this requirement.
- If you are under age 22 and start attending school or getting training for a paying job, please let us know if you:

  work, or

  receive support payments from a parent who does not live with you.

A Your Payment Is Based On These Facts

- You meet all the rules to be eligible for SSI beginning June 28, 1999. However, we cannot pay SSI until the month after you first meet the rules. Because of this, we will pay you SSI beginning July 1999.
- You were disabled in June 1999 on.
- In June 1999 on you were not regularly attending school.
- You were living in the State of Massachusetts for June 1999 on.
- The amount of money we pay you from the State of Massachusetts depends on the State's rules.

  You are living in someone else's home for July 1999 on.
- You have monthly income which must be considered in figuring your payment as follows:
  - Your Social Security benefits-- before deductions for Medicare premiums, if any-- of $265.00 for June 1999 through July 1999 and $310.00 for August 1999 through September 1999

SSA has long been aware that its SSI award letters do not clearly show the relationship between program rules and the amount of an SSI benefit. For example, an SSA document cites participants in a 1992 focus group as criticizing SSI award notices for not clearly explaining how SSA calculates benefit amounts and, in particular, for not explaining variations in the amount of monthly benefits. Also in 1992, the Office of Inspector General in the Department of Health and Human Services (HHS) recommended that SSA revise its SSI award letters to include a worksheet to show how SSA determined the benefit amount.[8] More recently, in January 2000, the U.S. District Court for the Eastern District of New York similarly instructed SSA to revise its SSI award letters to provide information necessary to permit a reasonable person to understand the basis for the agency's action on a number of subjects, including worksheets to show how benefits were computed.[9]

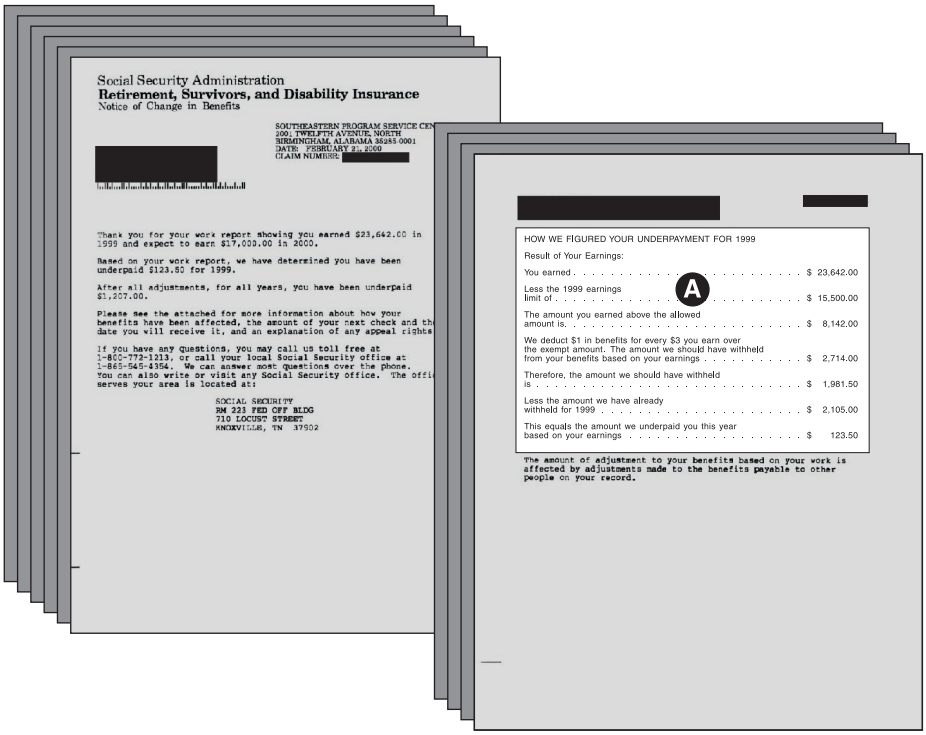
The Financial Effect of Many SSA Decisions Is Difficult to Understand Because of Confusing Time Periods and Numerical Information

The financial effect of SSA's decision was generally clear in the letters awarding Social Security and SSI benefits but not clear in letters adjusting them. In some cases, the letters contained conflicting information about when adjustments would occur and, additionally, in some cases it was not clear whether benefits were increasing or decreasing. Letters also contained confusing numerical information involving the computation of payment adjustments. For example, the financial effect of SSA's decision on amounts payable to or owed by individuals was unclear in 86 percent of the letters we sampled that involved adjustments of Social Security benefits. We found that worksheets, which were intended to show how SSA computed amounts overpaid or underpaid to individuals, used unexplained amounts. As shown in figure 3, one worksheet showed SSA's computations to support the fact that the agency should have withheld $2,714 of an individual's benefits because his yearly earnings were $8,142 over the limit. However, on the next line, the worksheet shows the amount that should have been withheld as $1981.50—an amount that the attachment did not explain. No explanation is given of the difference in the two amounts cited as "should be withheld."

[8]HHS, Office of Inspector General, *Examples of Revised Supplemental Security Income Notices,* OEI-07-9002461 (Sept. 1992).

[9]Ford et al. v. Apfel, No. CV-94-2736 (E.D.N.Y., Jan. 13, 2000).

Figure 3: A Social Security Benefit Adjustment Letter in Which the Financial Effect of SSA's Decision Is Unclear



Social Security Administration
Retirement, Survivors, and Disability Insurance
Notice of Change in Benefits

SOUTHEASTERN PROGRAM SERVICE CEN
200, TWELFTH AVENUE, NORTH
BIRMINGHAM, ALABAMA 35285 0001
DATE: FEBRUARY 21, 2000
CLAIM NUMBER:

Thank you for your work report showing you earned $23,642.00 in 1999 and expect to earn $17,000.00 in 2000.

Based on your work report, we have determined you have been underpaid $123.50 for 1999.

After all adjustments, for all years, you have been underpaid $1,207.00.

Please see the attached for more information about how your benefits have been affected, the amount of your next check and the date you will receive it, and an explanation of any appeal rights

If you have any questions, you may call us toll free at 1-800-772-1213, or call your local Social Security office at 1-865-545-4354. We can answer most questions over the phone. You can also write or visit any Social Security office. The offi serves your area is located at:

SOCIAL SECURITY
RM 223 FED OFF BLDG
710 LOCUST STREET
KNOXVILLE, TN 37902

HOW WE FIGURED YOUR UNDERPAYMENT FOR 1999

Result of Your Earnings:

You earned	$ 23,642.00
Less the 1999 earnings limit of	$ 15,500.00
The amount you earned above the allowed amount is.	$ 8,142.00
We deduct $1 in benefits for every $3 you earn over the exempt amount. The amount we should have withheld from your benefits based on your earnings	$ 2,714.00
Therefore, the amount we should have withheld is	$ 1,981.50
Less the amount we have already withheld for 1999	$ 2,105.00
This equals the amount we underpaid you this year based on your earnings	$ 123.50

The amount of adjustment to your benefits based on your work is affected by adjustments made to the benefits payable to other people on your record.

A HOW WE FIGURED YOUR UNDERPAYMENT FOR 1999

Result of Your Earnings:

You earned	$23,642.00
Less the 1999 earnings limit of	$15,500.00
The amount you earned above the allowed amount is	$ 8,142.00
We deduct $1 in benefits for every $3 you earn over the exempt amount. The amount we should have withheld from your benefits based on your earnings	$ 2,714.00
Therefore, the amount we should have withheld is	$ 1,981.50
Less the amount we have already withheld for 1999	$ 2,105.00
This equals the amount we underpaid you this year based on your earnings	$ 123.50

In some cases, a worksheet adequately explained SSA's computations for amounts it underpaid individuals; however, the worksheet then listed an adjustment to the underpayment by an amount that it did not explain. In one particular example, a worksheet explained how SSA computed that it had underpaid an individual $17 by stating that the individual had an earnings limit of $17,000 for 2000. It then stated, "because of other adjustments, you are due an additional $17.00."

Claimant's Recourse Is Difficult to Understand Because of Incomplete Information

SSA's explanations of the recourse available to individuals who disagree with SSA's decisions on their claims were generally clear in SSI award and benefit adjustment letters but, to varying degrees, were unclear in the Social Security award and benefit adjustment letters because of incomplete information. Most Social Security award letters did not clearly explain how to appeal SSA's decisions, and almost a quarter of the letters adjusting Social Security benefits did not fully inform individuals of all options for repaying overpayments or how to appeal SSA's decisions.

Data on the frequency of the use of certain paragraphs in Social Security award letters showed that 95 percent of these letters sent during a recent 3-month period did not inform individuals that if they chose to appeal SSA's decision, they had to do so in writing. SSA officials were unaware that letters omitted this information and said that under the discussion of appeal rights, letters should have instructed individuals to request a specific form for making their appeals.

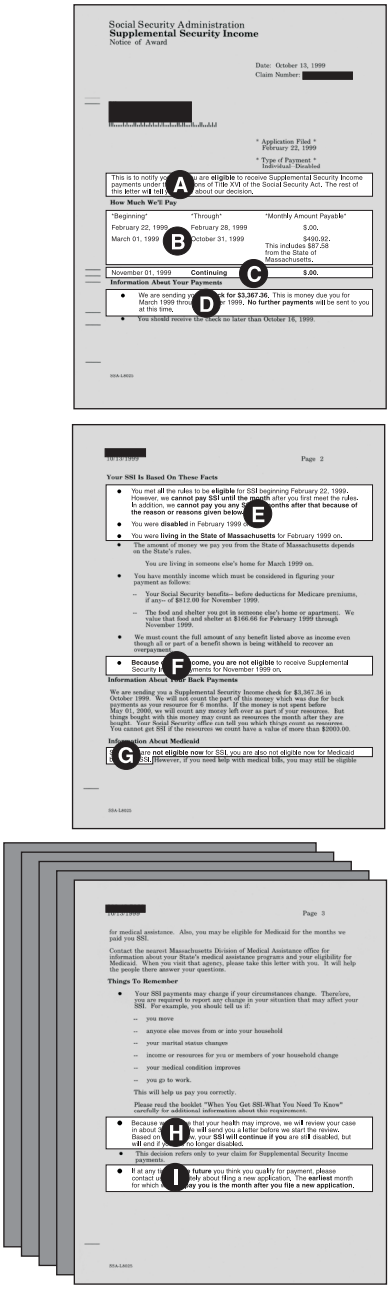
Twenty-four percent of the Social Security benefit adjustment letters in our sample did not fully inform individuals at the beginning of the letter of the recourse available to them. The cover sheet for some letters instructed individuals to immediately repay the full overpayment amount without also informing them of the other repayment options discussed in the attachment. The attachment informs them that they can either have SSA withhold benefits until the amount is fully repaid or, if they cannot afford this, request SSA to withhold smaller amounts over a longer period of time. Focus group participants in SSA's 1992 study indicated a preference for placing such information in the cover sheet. It was thought that when people largely depend on Social Security payments, it would be helpful to let them know immediately that they have other options for making repayment. In other cases, the cover sheets referred individuals to the attachment for an explanation of their appeal rights; however, no language addressing appeal rights could be found in the attachment.

Some SSI Award Letters Are Especially Difficult to Understand

One particular group of SSI award letters—those sent to notify SSI applicants that they have been awarded benefits for previous but not future months—proved particularly confusing, because they contained numerous contradictions, illogically sequenced explanations, and incorrect statements.[10] As a result, none of the four key points—SSA's decision, the basis for the decision, the financial effect on the individual, and the recourse available to the claimant—are clear. Key excerpts from a typical letter that awarded benefits only for previous months illustrate these letters' many problems, as seen in figure 4 (in which we have highlighted passages with bold type). This letter was sent on October 13, 1999, to a disabled adult. In 1998 and 1999, more than 100,000 individuals, or about 13 to 15 percent of all SSI awardees, received benefits only for previous months and thus would have gotten a similar letter.

[10]This situation occurs when individuals' cirsumstances change while they are waiting for SSA's eligibility decision on their application for benefits. Their change in circumstances makes them eligible to receive benefits for one or more months after they applied for SSI but ineligible for SSI benefits in the current month. A common scenario involves disabled individuals who meet the SSI program's income limit only until they receive Social Security Disability Insurance benefits. Their SSI payments stop once their Social Security Disability Insurance payments cause them to exceed the SSI program's income limit.

Figure 4: An Unclear SSI Award Letter



Social Security Administration
Supplemental Security Income
Notice of Award

Date: October 13, 1999
Claim Number: [redacted]

[redacted]

* Application Filed *
February 22, 1999

* Type of Payment *
Individual - Disabled

A This is to notify you that you are **eligible** to receive Supplemental Security Income payments under the provisions of Title XVI of the Social Security Act. The rest of this letter will tell you more about our decision.

How Much We'll Pay

Beginning	*Through*	*Monthly Amount Payable*
February 22, 1999	February 28, 1999	$.00.
March 01, 1999	October 31, 1999	$490.92. This includes $87.58 from the State of Massachusetts.
November 01, 1999	**Continuing**	**$.00.**

Information About Your Payments

- We are sending you a **check for $3,367.36.** This is money due you for March 1999 through October 1999. **No further payments** will be sent to you at this time.
- You should receive the check no later than October 16, 1999.

SSA-L6025

[redacted] Page 2

Your SSI Is Based On These Facts

- You met all the rules to be **eligible** for SSI beginning February 22, 1999. However, we **cannot pay SSI until the month** after you first meet the rules. In addition, we **cannot pay you any SSI for months after that because of the reason or reasons given below.**
- You were **disabled** in February 1999 on.
- You were **living in the State of Massachusetts** for February 1999 on.
- The amount of money we pay you from the State of Massachusetts depends on the State's rules.

  You are living in someone else's home for March 1999 on.
- You have monthly income which must be considered in figuring your payment as follows:
  - Your Social Security benefits– before deductions for Medicare premiums, if any– of $812.00 for November 1999.
  - The food and shelter you get in someone else's home or apartment. We value that food and shelter at $166.66 for February 1999 through November 1999.
- We must count the full amount of any benefit listed above as income even though all or part of a benefit shown is being withheld to recover an overpayment.
- **Because of your income, you are not eligible** to receive Supplemental Security Income payments for November 1999 on.

Information About Your Back Payments

We are sending you a Supplemental Security Income check for $3,367.36 in October 1999. We will not count the part of this money which was due for back payments as your resource for 6 months. If the money is not spent before May 01, 2000, we will count any money left over as part of your resources. But things bought with this money may count as resources the month after they are bought. Your Social Security office can tell you which things count as resources. You cannot get SSI if the resources we count have a value of more than $2000.00.

Information About Medicaid

Since you are **not eligible now** for SSI, you are also not eligible now for Medicaid based on SSI. However, if you need help with medical bills, you may still be eligible

SSA-L6025

[redacted] Page 3

for medical assistance. Also, you may be eligible for Medicaid for the months we paid you SSI.

Contact the nearest Massachusetts Division of Medical Assistance office for information about your State's medical assistance programs and your eligibility for Medicaid. When you visit that agency, please take this letter with you. It will help the people there answer your questions.

Things To Remember

- Your SSI payments may change if your circumstances change. Therefore, you are required to report any change in your situation that may affect your SSI. For example, you should tell us if:
  - you move
  - anyone else moves from or into your household
  - your marital status changes
  - income or resources for you or members of your household change
  - your medical condition improves
  - you go to work.

  This will help us pay you correctly.

  Please read the booklet "When You Get SSI-What You Need To Know" carefully for additional information about this requirement.
- Because we believe that your health may improve, we will review your case in about 3 years. We will send you a letter before we start the review. Based on that review, your **SSI will continue if you** are still disabled, but will end if you are no longer disabled.
- This decision refers only to your claim for Supplemental Security Income payments.
- If at any time **in the future** you think you qualify for payment, please contact us immediately about filing a new application. The **earliest** month for which we **can pay you is the month after you file a new application.**

SSA-L6025

A This is to notify you that you are **eligible** to receive Supplemental Security Income payments under the provisions of Title XVI of the Social Security Act. The rest of this letter will tell you more about our decision.

B

Beginning	*Through*	*Monthly Amount Payable*
February 22, 1999	February 28, 1999	$.00.
March 01, 1999	October 31, 1999	$490.92. This includes $87.58 from the State of Massachusetts.

C November 01, 1999 **Continuing** **$.00.**

D
- We are sending you a **check for $3,367.36**. This is money due you for March 1999 through October 1999. **No further payments** will be sent to you at this time.

E
- You met all the rules to be **eligible** for SSI beginning February 22, 1999. However, we **cannot pay SSI until the month** after you first meet the rules. In addition, we **cannot pay you any SSI for months after that because of the reason or reasons given below**.
- You were **disabled** in February 1999 on.
- You were **living in the State of Massachusetts** for February 1999 on.

F
- **Because of your income, you are not eligible** to receive Supplemental Security Income payments for November 1999 on.

G Since you are **not eligible now** for SSI, you are also not eligible now for Medicaid based on SSI.

H
- Because we believe that your health may improve, we will review your case in about 3 years. We will send you a letter before we start the review. Based on that review, your **SSI will continue if you** are still disabled, but will end if you are no longer disabled.

I
- If at any time **in the future** you think you qualify for payment, please contact us immediately about filing a new application. The **earliest** month for which we **can pay you is the month after you file a new application**.

SSA's decision is unclear, because the letter shown in figure 4 goes back and forth as to whether the applicant is eligible or ineligible for SSI. For example, the first sentence in the letter ("A") informs the applicant that she is eligible for SSI benefits, as does the first sentence on the second page of the letter ("E"). She is also told on a subsequent page that her benefits will continue if she is still disabled in the future ("H"). But elsewhere in the letter, she is told that she is not eligible for SSI ("F" and "G") and that she will not be receiving any more payments ("C," "D," and "E").

The basis for SSA's decision is unclear as well because the letter illogically tells the applicant that she cannot receive any more payments because she is disabled and living in Massachusetts ("E"). Also, this illogical reason for nonpayment is listed before the actual reason for nonpayment—her income ("F").

The financial effect of SSA's decision is unclear, because the letter makes contradictory statements about the months for which benefits are payable. First, the letter informs the reader that she will receive $3,367.36 in benefits for March through October 1999 ("B" and "D"), but later it incorrectly states that SSA can pay benefits for only 1 month—March 1999 ("E").[11]

Finally, the recourse available to the claimant is unclear, because the letter incorrectly informs her that she must file a new application before she can receive any more benefits ("I"). The letter does not explain that under SSI program rules, monthly benefits can resume without the need to file a new application if the individual becomes eligible again within 12 months. The letter is not clear about SSA's decision, the basis for the decision, the financial effect of the decision, or the applicant's appeal rights.

Needed Improvements Are Still Years Away

SSA has been aware for several years of the more serious problems we found with three of the four categories of letters we reviewed—those adjusting Social Security benefits, adjusting SSI benefits, and awarding SSI benefits. The agency considers sending clear letters an important element of customer service and specifically targeted these letters for improvement, yet the actions it has taken to improve them have been limited. Its efforts have primarily focused on the changes that are the easiest to complete. The more serious problems we found require more

[11]This incorrect statement occurs in these letters only when individuals receive more than 1 month's past due benefits—a common scenario, according to SSA.

comprehensive language revision and rewriting software applications, and planned changes have been repeatedly rescheduled because SSA did not have the computer systems resources available to implement them because of other priorities. SSA has recently announced plans to make the needed improvements to these three categories of letters. However, SSA has not established meaningful performance measures to monitor its progress in improving the letters.

SSA Has Made Little Progress in Improving Three Letter Categories

Since at least the early 1990s, SSA has known about problems with the Social Security benefit adjustment letters, the SSI award letters, and the SSI benefit adjustment letters, which we identified as being the most problematic, and the agency agrees that they are among the least understandable and most sensitive of the agency's high-volume mailings. Annually SSA sends out about 3.5 million Social Security benefit adjustment letters, 0.6 million SSI award letters, and 3.3 million SSI benefit adjustment letters.[12] In various strategic and performance plans, SSA has identified sending customers clear letters as an element of good service, and beginning with its fiscal year 2000 performance plan, SSA specifically targets improving these three letters as a strategy that would increase customers' overall satisfaction with the agency. Improving its letters is listed as one of the agency's key initiatives.

Despite acknowledging numerous problems with the three categories of letters, SSA has completed only one minor improvement to one letter—the Social Security benefit adjustment letter. In July 1999, SSA added a worksheet to this letter to show how the agency computed amounts it underpaid or overpaid individuals on the basis of their earnings. However, SSA officials view the worksheet as an interim improvement because SSA did not rewrite the master record to expand its capacity to hold additional data so that it could provide the appropriate information to support the worksheet. We drew our sample of Social Security benefit adjustment letters after SSA began including worksheets with these letters. We found the worksheets helpful to some extent in explaining how individuals' earnings contributed to SSA's decision that it had underpaid or overpaid them. However, as previously discussed, the worksheets sometimes did not

[12]Because of recently enacted legislation, Public Law 106-182, that eliminated earnings-related reductions in benefits for beneficiaries who have reached full retirement age, the volume of Social Security benefit adjustment letters will decrease in the future, but SSA has not determined by exactly how much.

adequately explain some of the adjustments SSA made when computing underpayments or overpayments, in part because doing so would require rewriting the master records.

In addition to the completed change described above, SSA recently began to address two of the problems we identified during the course of our present work. First, the agency has taken steps to respond to the lack of language in Social Security award letters to inform individuals of the form to use to appeal the agency's decisions. After we brought this problem to SSA's attention, SSA officials told us the responsible program office has developed revised language and has requested the Office of Systems to implement the language change as soon as reasonably possible. In commenting on a draft of this report, SSA informed us that it plans to implement the change in November 2000. SSA has also initiated action to correct the error in SSI award letters sent to individuals eligible for benefits in previous months but not current benefits that states that they need to make a new application. SSA officials told us that when the agency releases its next set of SSI systems changes in October 2000, they plan to add language to the letters to correct this problem.

Systems officials told us that from a systems standpoint, these types of problems are the easiest to correct because they involve a straight substitution of language—one paragraph replaces another paragraph that had been used for the same situation. This type of revision is relatively straightforward because the software logic for selecting the paragraph for insertion into a letter does not have to be revised. Therefore, SSA could act relatively quickly to address these two problems.

It Will Take SSA Years to Make Comprehensive Improvements to Letters

SSA has made less progress in correcting some of the problems that are more difficult to fix. As shown in table 2, the other problems we found would require significant work to revise the language used in the letters and rewrite the master records and software applications.

Table 2: Comprehensive Improvements Needed for Selected SSA Letters

Letter	Needed improvement
Social Security benefit adjustment	Revise language, rewrite program's master record, and rewrite software application so that • Cover sheet discloses all decisions discussed in attachment • Work-related earnings rules are co-located and logically sequenced • Letter clearly explains decision's effect on payment to individual, and • Letter completely explains available recourse
SSI award	Revise language, rewrite program's master record, and rewrite software application so that • Letter adequately explains the basis for the decision and • Letter explains the relationship between program rules and benefit amount
SSI benefit adjustment	Revise language, rewrite program's master record, and rewrite software application so that • Letter adequately explains a decision's effect on payment, particularly how and when adjustments will be made for overpayments or underpayments in the past months

Systems officials told us that the actions the agency would need to take to make the comprehensive changes the three letters need are the most complicated from a systems perspective because they involve extensive revision or development of new paragraph language; rewriting the software application, including the selection and sequencing criteria for using the language; and rewriting the programs' master records to hold additional data that may be necessary to support proposed language changes.

SSA's ability to make these comprehensive improvements to the three letters depends on the agency's allocating significant systems resources. When allocating systems resources, SSA appropriately gives highest priority to projects that help the agency maintain operations essential to its mission or that it needs to undertake in order to implement legislative changes to the Social Security and SSI programs. Resources not committed to these efforts are available for SSA to use for discretionary projects, such as key initiatives that support one of its strategic goals. Improving letters is a key initiative. SSA senior officials collectively determine which discretionary projects the agency's systems staff will work on, based on each project's ranking and expected contribution to SSA's strategic objectives. However, the relative priority SSA gives projects can change. For example, SSA may decide to shift priorities and discontinue, delay, or deemphasize a specific project to undertake others in cases in which SSA does not have systems staff available.

Social Security Benefit Adjustment Letters

SSA has long had plans to make comprehensive improvements to one of the categories of letters—the Social Security benefit adjustment letter. According to SSA documents, by 1996, SSA had developed and tested in

focus groups comprehensive language changes for this letter. However, SSA's documents showed that since developing the language, the agency has repeatedly rescheduled the systems work required to implement the new language. SSA systems officials told us that their computer systems staff did not work on projects at the scheduled times because the agency had to divert computer programmers to other, more pressing projects, such as those required to implement significant program changes resulting from legislation and to ensure that SSA's computer systems were year 2000 compliant.[13] They told us that the agency, with the emergence of workloads arising from legislative changes, had to shift priorities away from working on improvements to letters.

Until recently, SSA's progress in changing the Social Security benefit adjustment letter was further limited by the agency's decision to make comprehensive changes to these letters a part of a broader multiyear initiative to redesign its current systems for processing transactions for Social Security programs. Under this redesign effort, SSA plans to develop a single system that will use common code to process virtually all transactions for the Social Security programs. SSA is taking a building block approach to this significant change and is starting with the easier applications in order to gain experience before merging other more complex applications—such as the one that generates Social Security benefit adjustment letters. SSA's plans for having a single computer system will allow the agency to rewrite the software more quickly and efficiently and at less cost. Systems officials told us that the agency had planned that as existing software applications were brought into the new redesigned system, it would make language improvements as needed, retire the respective language databases, and move the revised language into a central language database.

In July 2000, SSA program and systems officials told us that the agency had recently decided to move forward on making comprehensive improvements to the Social Security benefit adjustment letters without waiting to merge the respective software application under the new redesigned system. An SSA official told us that the office that drafted the proposed language changes had recently requested SSA senior officials to

[13]For example, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law No. 104-193) made major changes to the SSI program. Among other things, it revised the criteria under which children and noncitizens are eligible for benefits and added restrictions governing the payment and use of certain large retroactive benefit amounts.

designate the project to improve Social Security benefit adjustment letters as Customer Targeted Work. This is a relatively new category for the use of discretionary resources that gives the project a higher priority than it has been given before.[14] Although SSA is in the early planning stage of this effort, the Office of Systems has established a plan for completing the more comprehensive improvements by July 2002. However, because SSA's decision is recent, we did not evaluate the approach.

SSI Letters

SSA has not made comprehensive improvements to either type of SSI letter and has only recently begun developing action plans for improving them. SSA officials told us they postponed plans to improve SSI award and benefit adjustment letters, pending the outcome of the recently decided court case, a class action law suit that an SSI recipient initiated. In that case, the court upheld the plaintiffs' claim that SSA's letters denied recipients due process because the letters did not adequately explain the basis for SSA's decisions. The court ordered SSA to revise its automated SSI financial eligibility letters—including its SSI award and benefit adjustment letters—to more clearly communicate essential information to their readers.[15] SSA established a workgroup to review its SSI letters and determine what changes were needed to improve them. In December 1999, the SSA Commissioner signed a decision paper in which he approved the workgroup's recommendations to make comprehensive changes to SSI letters.

Improving SSI letters will take time. The workgroup recommended that SSA implement the recommendations in phases, concentrating first on better explaining how benefit amounts are determined. SSA has begun work on some of these changes. In February 2000, SSA drafted and tested with some SSI recipients a prototype worksheet to be added to SSI award and benefit adjustment letters showing how SSI benefits are computed. The worksheet is intended to show how SSI benefits are computed in the least complex cases—that is, the 90 percent of cases in which SSI recipients have no income or only unearned income, such as Social Security benefits. SSA plans to add the worksheet to the SSI letters by July 2002. By September 2004, SSA also plans to develop additional worksheets

[14]Key initiatives requiring systems work and Customer Targeted Work must provide a significant return on investment or help meet agency strategic goals. However, to be given the higher priority of Customer Targeted Work, a sponsoring component is required to substantiate the need for extra attention and prioritization.

[15]Ford et al. v. Apfel, No. CV-94-2736 (E.D.N.Y., Jan. 13, 2000).

covering more complex situations, such as when persons have a combination of earned and unearned income or when children receive benefits based on parents' income. The workgroup also recommended other improvements such as revising letters so that the information in them is logically ordered and adequately explains the factors that affect eligibility and benefit amounts. SSA officials estimated that it could take 10 years to implement the full range of planned improvements.

SSA Does Not Have a Means to Measure Progress in Improving Letters

Despite acknowledging problems with its letters, SSA currently has no performance measures for monitoring its progress toward improving them. In the past, SSA surveyed customers about their overall satisfaction with the agency's letters and monitored the percentage of customers rating the clarity of SSA's notices as excellent, very good, or good. SSA found that the information it collected, which was a measure of general satisfaction with the letters, was not useful in identifying ways to improve letters, so it discontinued these surveys. Instead, the agency now relies on a relatively new Market Measurement Program to help it target a few specific types of letters each year and develop action plans for improving them. This program uses a variety of initiatives, such as special studies and focus groups, to systematically gather information on the full range of services SSA provides to help the agency improve customer service overall. According to its fiscal year 2001 performance plan, the agency plans to establish a new indicator to monitor improvements to its letters at a later point.

Conclusion

Although SSA has been aware for many years of some of the more serious problems with its letters, it has not corrected them. The agency's recently announced plans to improve the Social Security benefit adjustment letter and its SSI award and benefit adjustment letters will take years to complete and will require significant computer systems resources. In view of the agency's past decisions to delay some planned changes to the letters because of competing demands for its computer systems resources, we believe that SSA needs to allocate the necessary systems resources for these improvements. To do this, the agency will need to better anticipate and plan for the varied demands on its computer systems' resources and place a higher priority on improving its letters. The agency will also need to develop appropriate performance measures with which to hold itself accountable to the public for achieving these improvements. These measures should help SSA monitor its progress in adhering to the proposed timetables to help the agency stay on track. In addition, because past

changes to letters have not always significantly improved clarity, SSA should develop other measures to assess whether changes to the letters have achieved the intended results. Failure to implement the needed improvements will mean continued poor service to the public in this area.

Recommendation

We recommend that the Commissioner of Social Security direct SSA officials to develop performance measures to hold the agency accountable for making the needed comprehensive changes to its Social Security benefit adjustment letters and SSI award and benefit adjustment letters. These measures should include indicators that clearly articulate the timetables and basis against which progress to complete improvements can be tracked and, as further progress is made, the effectiveness of the improvements.

Agency Comments

In commenting on a draft of this report, SSA generally agreed with our findings, conclusions, and recommendation (see app. II). SSA expressed its commitment to making the needed improvements to the letters addressed by our report as quickly as possible and outlined its plan for developing performance measures for beneficiary understanding of the problematic letters. In addition, SSA mentioned other initiatives to improve this aspect of its service. The agency stated that its efforts to improve letters have been focused on changes that could be made quickly and have resulted in the agency's improving most of the other types of letters it sends to the public. Indeed, as we mentioned previously, SSA improved the Social Security Statement, which provides estimates of future Social Security benefits, after we reported problems with it.[16] However, we have not formally evaluated the effectiveness of the other initiatives. Finally, SSA also made several technical comments, which we incorporated in the report where appropriate.

We are sending copies of this report to the Honorable Kenneth S. Apfel, Commissioner of SSA, and others who are interested. Copies will also be made available to others on request.

[16]GAO/T-HEHS-00-01, Apr. 11, 2000.

If you or your staff have any questions concerning this report, please call me on (202) 512-7215. The major contributors to this report are listed in appendix III.

Sincerely yours,

Barbara D. Bovbjerg
Associate Director, Education,
Workforce, and Income Security Issues

Scope and Methodology

We identified problems with letters for the Old Age and Survivor Insurance and Disability Insurance programs, commonly known as Social Security, and the Supplemental Security Income (SSI) program from our earlier work, by interviewing Social Security Administration (SSA) headquarters and field office officials and by reviewing other related studies. We also interviewed and obtained guidance documents from National Partnership for Reinventing Government officials responsible for the governmentwide initiative to have federal agencies improve their written communications to the public. Before deciding the categories of letters we would select for a detailed review, we performed a cursory review of several thousand that had been generated by more than 17 different automated programs. We also reviewed several types of letters prepared manually by the SSA offices where we conducted our fieldwork. The automated letters we reviewed represented the types of letters that are produced across SSA. We decided to limit the focus of our work to letters produced by automated means and exclude manually prepared letters because SSA lacked management information that would allow us to identify and quantify them for sampling.

Given the range of issues that SSA's letters address, we screened first for letters that conveyed information on issues that in our view would more likely affect recipients adversely if the letters were not understandable. From among this group of letters, we selected categories that we believed had the most serious problems. We chose four types of letters—an award letter and a benefit adjustment letter for each of the two programs, Social Security and SSI. On the basis of our preliminary screening, we judged these letters to contain the most serious problems among all categories of letters that convey SSA's decision on individuals' eligibility for benefits or adjustments to their benefits.[1]

We used SSA's customer service pledge, which promises that letters the agency sends customers will meet certain standards, and our professional judgment as the basis for deciding the issues that letters need to clearly convey to individuals.[2] We based our detailed assessment of the letters on our premise that letters should

[1]We excluded from detailed analysis (1) letters that SSA sent to government agencies or businesses and (2) other types of letters that conveyed eligibility and benefit adjustment decisions but appeared to have less serious problems with clarity.

[2]SSA pledges to customers that "We will clearly explain our decisions so you can understand why and how we made them and what to do if you disagree."

1. Clearly state SSA's decision (that is, they should clearly communicate the decision SSA made to award, deny, or adjust benefits or that it had overpaid or underpaid individuals).

2. Sufficiently and clearly explain the basis for SSA's decision.

3. Clearly explain the financial effect SSA's decision will have on payments to the individual and, if applicable, how SSA computed payments or change in payments.

4. Clearly explain the actions the individual can take if he or she disagrees with SSA's decision.

We used the assistance of two writing consultants to identify writing deficiencies in cases in which letters were unclear in any of the four areas. We tested our methodology for assessing letters by applying it to a small number of letters that contained a range of problems, and we had the consultants also apply it to the same letters. We resolved differences in the way the consultants and we assessed the letters. We used the agreed-upon methodology to identify problems in the statistical sample of benefit adjustment letters discussed below.

Because SSA's electronic files for 1 day's production of automated letters are multiple and voluminous, and because SSA did not have resources readily available to provide us with a computer-generated sample, we consulted with SSA officials to determine the best sampling method. We randomly sampled 1 day's production of Social Security benefit adjustment letters and 1 day's production of similar SSI letters. Our sample of Social Security letters consisted of 104 letters selected from among the first 933 (of a total of 3,910) that SSA produced on February 14, 2000. Our SSI sample included all 64 letters that SSA produced on March 2, 2000 (of a total of 9,448) for which the beneficiaries' Social Security numbers ended in a predetermined two-digit number. Our estimates of the frequency of problems we found with the benefit adjustment letters in both samples can be generalized to the universe of such letters that SSA produced on the days the samples were drawn. On the basis of statements of SSA officials, we believe that our sampling methodology produced a representative selection of the sampled days' workloads that were typical of workloads throughout the year.

Because the estimates we report are based on a sample, a margin of error or imprecision surrounds them. This imprecision is usually expressed as a

sampling error at a given confidence level. We calculated sampling errors for our estimates of how frequently letters were unclear at the 95 percent confidence level. The sampling error for percentage estimates we cite in this report is plus or minus 12.1 percentage points at the 95 percent confidence level.

We did not use random samples for our work on Social Security and SSI award letters. After we reviewed a variety of these award letters and identified specific problems with them, we were able to obtain information from SSA officials to quantify the frequency of the problems without sampling. SSA officials provided us information on how many of the Social Security award letters were generated during a recent 3-month period—December 1999 through February 2000—and how many of these letters contained certain appeals language that we identified as problematic. We discussed with SSA officials the problems we identified in the SSI award letters, and they confirmed that these problems exist in all SSI award letters because of shortcomings in their computer systems.

To determine SSA's actions and plans to correct problems with the categories of letters that were the subject of our work, we reviewed SSA's 5-year plan and annual plans to identify the agency's objectives and goals. We also interviewed SSA officials and reviewed the agency's documents relating to its initiatives to improve letters to determine what actions SSA has proposed to address problems and its plans for implementing them. We interviewed SSA officials to gain an understanding of the actions required to correct the problems we identified and the SSA offices responsible for initiating the actions, and we reviewed SSA's process for implementing actions that would improve letters.

We performed our work at SSA headquarters in Baltimore, Maryland, and SSA field locations in Chicago, Illinois; Reisterstown, Maryland; and Richmond, Virginia. We conducted our work between June 1999 and July 2000 in accordance with generally accepted government auditing standards.

Comments From the Social Security Administration

SOCIAL SECURITY
Office of the Commissioner
September 13, 2000

Ms. Barbara D. Bovbjerg
Associate Director, Education,
Workforce, and Income Security Issues
U.S. General Accounting Office
Washington, D.C. 20548

Dear Ms. Bovbjerg:

Thank you for the opportunity to comment on the General Accounting Office report, "Longstanding Problems in SSA's Letters to the Public Need to be Fixed" (GAO/HEHS-00-179). We agree with the recommendation in the report and remain committed to improving the quality of our problematic notices. As you have acknowledged in your report, in spite of increasing workloads and efforts to address Agency priorities, such as maintaining program integrity, the Agency has made major notice enhancements.

In fact, we have improved the clarity of the vast majority of our notices and the explanations we provide to inquiries from notice recipients, and have modernized and streamlined the notice production environment. This includes letters to retirement, survivors and disability beneficiaries, Supplemental Security Income (SSI) overpayment letters, notices announcing cost-of-living adjustments, notices to employers and employees and the Social Security Statement, which provides estimates of future Social Security benefits.

These initial efforts, directed at the notice improvements that affected the greatest numbers of our customers and could be implemented the most quickly, allowed us to improve approximately 90 percent of the notices we issue to about 230 million individuals and their payees each year. The remaining 10 percent, including those discussed in this report, represent our most complicated notices and improving them will require diverting resources from other priorities.

It should be remembered that no matter how much improvement is made in our most problematic notices, complex issues and/or unique situations will continue to result in many of our customers still needing or wanting to discuss the information received. Therefore, in addition to improving the majority of our notices, we have provided our public contact personnel with additional capabilities to use when responding to concerns or questions about notices. As a result of the Online Notice Retrieval System (ONRS), implemented nationally in November 1998, public contact personnel in our field offices and teleservice centers now have direct online access to the specific notice information and language contained in the vast majority of notices received by the public. The next release of ONRS, planned for later this year, will provide online access to virtually all remaining notices by our public contact personnel and will further enhance our ability to communicate effectively with our customers.

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With regard to the notices that were the focus of your report, I am pleased to report that we have already made some progress in addressing the problems identified regarding the Social Security Award Notice and the Social Security Benefit Adjustment Notice. The remaining problems with the Award Notice will be resolved by November 2000. With regard to remaining problems with the Social Security Benefit Adjustment Notice, we have a team working to complete all improvements in these notices by July 2002. We face our most difficult task and greatest challenge in improving SSI Awards and Benefit Adjustments Notices. Because the SSI program is complex, explanations of the effect of income and living arrangement changes will always, by their nature, be difficult to present in an easily understood manner. In addition, improvements to these notices will require a significant investment of information technology resources to change the SSI computational and notices systems.

Although, as noted in the report, there are no quick fixes for making improvements in this area, we are committed to making the improvements needed as quickly as possible.
SSA has begun work on some of these changes. In February 2000, we drafted and tested with some SSI recipients a prototype worksheet to be added to SSI award and benefit adjustment letters showing how SSI benefits are computed. The worksheet that we tested was intended to show how SSI benefits are computed in relatively uncomplicated cases - that is, the 90 percent of cases in which SSI recipients have no income or only unearned income, such as Social Security benefits. We plan to add the worksheet to the SSI letters for this population by July 2002 and then focus test the worksheet with SSI recipients who have a combination of earned and unearned income.

In our annual customer satisfaction survey, we ask respondents to rate the clarity of information we mail to them. Our most recent survey results indicate that 86 percent rated the clarity of our mailed information as "Excellent," "Very Good" or "Good." Of course, many of these respondents received very simple notices, and we are not able to break out results for recipients of only our more complex notices. Therefore, to develop performance measures for notice clarity and beneficiary understanding of our problematic notices, we need to secure benchmark information about how well our beneficiaries currently understand these problematic notices. The Office of Quality Assurance and Performance Assessment (OQA) will conduct a customer satisfaction survey for the targeted notices in fiscal year 2001 to obtain this information. Using the feedback obtained from the benchmark survey, we will pursue the development of performance measures that address GAO's concerns. As revised notice language is developed, OQA will conduct followup customer surveys targeted to measure the level of customer understanding of the revised notices and the degree to which the desired performance has been achieved.

Thank you again for your analysis of this most important issue. We agree that ensuring that our notices and letters are easily understood must continue to be a central element to our overall plan to provide high-level service to the public.

We have enclosed technical comments that we believe will improve the presentation and accuracy of the report. If you have any questions, please have your staff contact Dan Sweeney at (410) 965-1957.

Sincerely,

Kenneth S. Apfel

Kenneth S. Apfel
Commissioner
of Social Security

Enclosure

GAO Contacts and Staff Acknowledgments

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In addition to the persons named above, others made important contributions to this report: Jacquelyn Stewart, Evaluator-in-Charge; Ellen Habenicht, Senior Evaluator; Valerie Melvin and James Wright, Assistant Directors; Michael Alexander, Senior Information Systems Analyst; Patrick di Battista, Communications Analyst; Jay Smale, Social Science Analyst; and Ann McDermott, Visual Communications Analyst.

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