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SOCIAL SECURITY ADMINISTRATION

SSA's Letters to the Public Remain Difficult to Understand

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Social Security Administration: SSA's Letters to the Public Remain Difficult to Understand

Mr. Chairman and Members of the Subcommittee:

We are pleased to be here today to discuss the letters the Social Security Administration (SSA) sends to the public. Each year SSA mails millions of letters to applicants and recipients of the Old Age and Survivors Insurance and Disability Insurance programs, commonly referred to as Social Security, and the Supplemental Security Income (SSI) program. These letters tell the public whether they are eligible to receive monthly cash benefits or whether their benefit amounts are changing. Because the letters contain important information affecting people's everyday lives, they need to be clearly written and easy to understand. Recognizing this, 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 the decisions and what to do if it disagrees.

We have long been critical of SSA's letters. In 1994, we testified before this Subcommittee that many SSA letters, particularly those dealing with Social Security overpayments, were difficult to understand.[1] We found letters that left out information necessary to understand SSA's decisions, presented information in an illogical order, or failed to clearly explain how SSA had adjusted benefits. More recently, you asked us to assess SSA's progress in improving its letters. We have just completed that assessment and are issuing our report on this subject to you today.[2] My testimony, which summarizes the key findings of our report, focuses on (1) the problems that make SSA's letters difficult to understand and (2) the status of SSA's actions to fix them.

We focused our review on four categories of automated, high-volume letters to the public: (1) letters awarding Social Security benefits, (2) letters adjusting Social Security benefits, (3) letters awarding SSI benefits, and (4) letters adjusting SSI benefits.[3] SSA mails about 14.2 million of these letters each year.[4] We focused on these letters because they reach a

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

[2] *Social Security Administration: Longstanding Problems in SSA's Letters to the Public Need to Be Fixed* (GAO/HEHS-00-179, Sept. 26, 2000).

[3] 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.

[4] SSA estimates that it mails about 250 million letters and forms annually to the public, including claimants, workers, employers, and government agencies, on a wide variety of issues.

large number of people and convey important information on their eligibility for benefits or changes in the amount of their benefits—issues that can significantly affect their lives. We used writing consultants to help us develop the criteria to assess whether the letters communicated clearly and to verify our assessment of the types of problems that occur in them. We also interviewed SSA officials responsible for improving the agency's letters and reviewed documents on past and current evaluations of the letters and its initiatives to improve them.

In summary, our work showed that 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 payments to the individual, or (4) the recourse the individual 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—that is, not clearly explaining the program rules or facts on which SSA's decision was based—was the most widespread problem among the four categories of letters. We also found one particular group of SSI award letters in which none of the four key points was clear.

SSA acknowledges that these letters contain the problems we identified and agreed the problems have existed for years; however, for many of the problems, the agency has not taken any corrective action and, overall, the agency has not placed a high priority on improving its letters. Many of the problems we identified are not amenable to quick fixes but, rather, will require a comprehensive revision of the language in the letters and rewriting the agency's software applications that generate them. Competing demands for computer systems resources have led SSA to repeatedly reschedule improvements to the Social Security benefit adjustment letters, and a pending nationwide court case has led SSA to delay improvements to the SSI award and benefit adjustment letters. SSA recently announced plans to improve its Social Security benefit adjustment letters and has begun a major initiative to improve its SSI award and benefit adjustment letters. But it will be years before the improvements are completed for most of these letters, even if there are no more delays and SSA adheres to its current plans.

Background

The Social Security program and the SSI program provide monthly cash benefits to individuals who meet the programs' eligibility requirements. In

fiscal year 1999, 44.5 million persons received a total of $382.8 billion in Social Security 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.[5] 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 process for improving SSA's letters is complex as well. The 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 the problems and drafting revised language. The Office of Systems, 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. Each software application has its own programmed logic to generate letters and its own language database. Depending on the particulars of a transaction, each application is programmed to select appropriate paragraphs from among the numerous paragraphs in its language database, many of which were written for use 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 to sequence paragraphs to assemble letters. These master records contain account data for every beneficiary.

Problems in SSA's Letters Limit Their Understandability

Many of SSA's letters in our review do not meet the agency's own communication standard and do not meet 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

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

payments to the individual, and the recourse the individual has in response to SSA's decision. The unclear communication 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 either 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 letters 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: We used two different approaches to quantify the frequency of problems in these letters. For the letters awarding Social Security and SSI benefits, we identified specific problems and obtained information from SSA about the number or percentage of letters that included these problems. For the letters adjusting the amount of Social Security and SSI benefits, we reviewed a statistical sample of 1 day's production of letters.

As the table indicates, we found a variety of problems in the four categories of letters.

- SSA's decision was difficult to understand in Social Security benefit adjustment letters because important information was not explained in the cover letters but, rather, was buried in the attachments or not explained at

all. For example, a cover letter informed a claimant that she had been overpaid about $600 but it requested that she repay about $2,200. The explanation for the different amounts—SSA's decision to also recover a prior overpayment—was buried in the attachment. Another letter mentioned three different overpayment amounts without explaining the differences.

- The basis for SSA's decisions were often difficult to understand because the program rules or facts on which the decisions were based were explained in complex language that was difficult to follow, were presented in illogical order scattered throughout letters, or were not fully explained. For example, no SSI award letter explained the relationship between program rules and the amount of the SSI benefit. An SSI award letter informed a claimant that she was awarded benefits for July 1999 through November 1999 but that she would receive a benefit for October and November lower than for the earlier months. The letter did not explain why her benefit was reduced.

- The financial effect of SSA's decision on payments to claimants was difficult to understand in most Social Security and SSI benefit adjustment letters because of conflicting information about when adjustments would occur or whether benefits were increasing or decreasing and because of unexplained numerical information used to support SSA's computation of benefit adjustments. For example, a worksheet attached to a Social Security benefit adjustment letter included computations showing that, on the basis of the claimant's earnings, SSA should have withheld about $2,700 in benefits. But on the very next line, the worksheet states that SSA should have withheld about $2,000 in benefits. The letter did not explain the $2,000 figure or the difference in the two amounts.

- The recourse available to claimants in response to SSA's decisions on their claims was difficult to understand in Social Security award and benefit adjustment letters because of incomplete information. For example, the cover letters for some of the benefit adjustment letters instructed individuals to immediately repay the full Social Security overpayment without informing them of other repayment options discussed in the letters' attachments. The Social Security award letters failed to inform claimants that if they choose to appeal SSA's decision, they have to do so in writing.

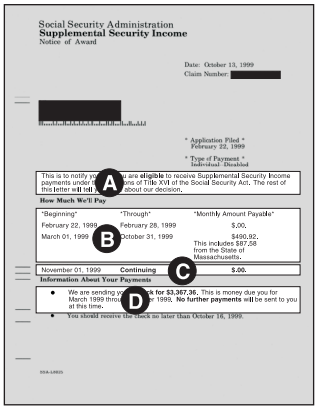
Our report discusses these problems in detail, with examples of actual letters.

Now to illustrate problems in SSA's letters, I would like to discuss one particular type of SSI award letter—ones sent to applicants who have been awarded benefits for previous but not future months. I have chosen an example of this type of letter not because it is representative of all SSA award and benefit adjustment letters—which, given the huge number and types of letters SSA issues, no one example could be—but because it illustrates in one letter problems in clearly communicating all four key points. Also, although SSA has long been aware of problems in its SSI award letters, the agency did not know about the particular problems in this type of letter until we brought them to its attention.

Figure 1 shows key excerpts from a typical letter, sent on October 13, 1999, to a disabled adult who was awarded benefits for previous months but not future months.[6] This example illustrates (with passages we have highlighted in bold type) the numerous contradictions, illogically sequenced explanations, and incorrect statements common to these letters. 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.

[6]This situation occurs when individuals' circumstances change while they are waiting for SSA's eligibility decision on their application for benefits. Their circumstances make them eligible to receive benefits for 1 or more months after they applied for SSI, but a change in their circumstances makes them 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 these benefits cause them to exceed the SSI program's income limit.

Figure 1: Confusing Statements From an Actual SSA 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

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.

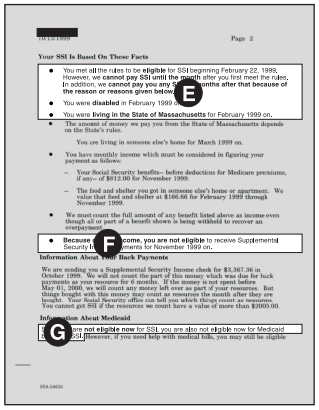
How Much We'll Pay

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-L8025



[redacted]
10-13-1999 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.

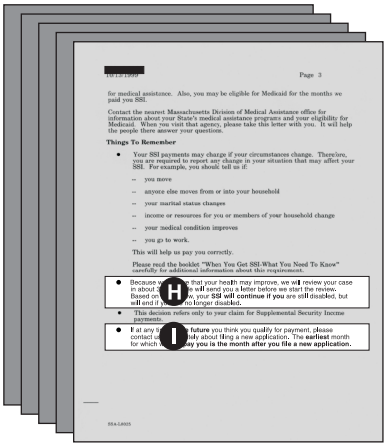
Information About Your Back Payments

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

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-L8025



[redacted]
10-13-1999 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-L8025

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 1 goes back and forth about 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—namely, 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 applicant 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 only for 1 month—March 1999 ("E").[7]

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 she becomes eligible again within 12 months.

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, those adjusting SSI benefits, and those awarding SSI benefits. The agency considers sending clear letters an important element of customer service, and it specifically targeted these letters for improvement, yet it has taken only limited actions to improve them. Its efforts have focused primarily on the changes that are the easiest to complete. The more serious problems we found require more comprehensive revision of language and rewriting of software applications. Planned changes have been repeatedly rescheduled because

[7]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.

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 These Letters

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 that we identified as being the most problematic. The agency agrees that these letters 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.[8] In various strategic and performance plans, SSA has identified sending customers clear letters as an element of good service. 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. As we noted in table 1, we found that 86 percent of these letters lacked a clear explanation of adjustments to benefits. In July 1999, SSA added a worksheet to this letter to show how the agency computed the amount 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. The master record holds data on each individual and would have to be expanded 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, the worksheets sometimes did not adequately explain some of the adjustments SSA made when

[8]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 sent to individuals will decrease in the future, but SSA has not determined exactly by how much.

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 include language that had been omitted from Social Security award letters informing 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 that the responsible program office has developed revised language that the Office of Systems plans to implement 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, shown at "I" in figure 1. 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.

Office of 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. SSA could therefore act relatively quickly to correct these two problems.

It Will Take Years for SSA to Make Comprehensive Improvements to Letters

SSA has made less progress in correcting 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 of the letters and to rewrite the master records and software applications.

Table 2: The Comprehensive Improvements Needed for Selected SSA Letters

Letter	Improvement
Social Security benefit adjustment	Revise language, rewrite program's master record, and rewrite software application so that • Cover letter 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 past months' overpayments or underpayments

Office of Systems officials told us that the actions the agency would need to take to make the comprehensive changes that the three letters need are the most complicated from a systems perspective because they involve extensive work to revise or develop new paragraph language, to rewrite the software application—including the selection and sequencing criteria for using the language—and to rewrite 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, and 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. Officials from SSA's Office of Systems told us that their computer systems staff did not work on projects at the scheduled times because the agency had 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.[9] 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.

In July 2000, an SSA official told us that the responsible program office had recently requested that SSA senior officials 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 and would give the project a higher priority than it has had before.[10] 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 revised 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 that 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

[9]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.

[10]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.

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.[11] SSA established a workgroup to review its SSI letters and to determine the changes that 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 that shows 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. 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. The agency, however, 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 SSA discontinued these surveys. Instead, SSA now relies on a relatively new program to help it target a few specific types of letters each year and develop action plans for improving them. This program—the Market Measurement Program—uses a variety of initiatives, such as special studies and focus groups, to gather information on the full range of services SSA provides to help the agency improve customer service overall. According to SSA's fiscal year 2001 performance plan, the agency plans to establish a new indicator to monitor improvements to its letters at a later point.

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

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 require significant computer systems resources and will take years to complete. If SSA is to improve its letters within a reasonable period of time, it 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.

Because failure to implement the needed improvements will mean continued poor service to the public in this area, we recommend that SSA develop performance measures to hold itself accountable for making the needed comprehensive changes to its letters. These measures should include indicators to allow SSA to track its progress in making improvements and to assess the improvements' effectiveness. In commenting on our report, SSA agreed with our recommendation and expressed its commitment to making the needed improvements in these letters as quickly as possible. SSA also outlined its plan for developing performance measures for assessing beneficiaries' understanding of its problematic letters.

Mr. Chairman, this concludes my prepared statement. I would be pleased to answer any questions you or Members of the Subcommittee may have.

GAO Contact and Staff acknowledgments

For more information regarding this testimony, please contact Barbara D. Bovbjerg at (202) 512-7215. Others who made key contributions to this testimony include Kay Brown, Jacquelyn Stewart, Ellen Habenicht, Valerie Melvin, James Wright, Michael Alexander, Jay Smale, Ann McDermott, and Patrick di Battista.

Related GAO Products

Social Security Administration: Longstanding Problems in SSA's Letters to the Public Need to Be Fixed (GAO/HEHS-00-179, September 26, 2000).

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

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