



August 2016

# SUPPLEMENTAL SECURITY INCOME

SSA Provides  
Benefits to Multiple  
Recipient Households  
but Needs System  
Changes to Improve  
Claims Management

# GAO Highlights

Highlights of [GAO-16-674](#), a report to congressional requesters

## Why GAO Did This Study

SSA administers SSI, which provides cash benefits to eligible aged, blind, and disabled individuals with limited financial means. Generally, SSI recipients are eligible to receive up to a maximum benefit amount, though the maximum is lower for married couple recipients. Other households with multiple SSI recipients are not subject to this benefit reduction. GAO was asked to review households that include multiple SSI recipients.

GAO examined what is known about (1) SSI recipients who live in households with other SSI recipients, (2) SSI benefits received by households with multiple SSI recipients, and (3) potential effects of implementing a change in the benefits received by households with multiple SSI recipients. GAO reviewed relevant federal laws, and regulations; analyzed May 2013 SSA administrative data on SSI recipients that was matched with U.S. Census survey data, the most recent matched data available; and interviewed researchers, disability advocates, and SSA officials in headquarters and five field offices selected for geographic dispersion, a higher concentration of multiple SSI recipient households, and overall population density.

## What GAO Recommends

GAO recommends that SSA assess risks associated with the manual process for adjusting claim records for SSI multiple recipient households, and, as appropriate, take steps to make system improvements. SSA disagreed, based in part on its prior payment and accuracy reviews, but GAO continues to believe an assessment is warranted, as discussed in the report.

View [GAO-16-674](#). For more information, contact Dan Bertoni at (202) 512-7215 or [bertonid@gao.gov](mailto:bertonid@gao.gov).

August 2016

## SUPPLEMENTAL SECURITY INCOME

# SSA Provides Benefits to Multiple Recipient Households but Needs System Changes to Improve Claims Management

## What GAO Found

In May 2013, an estimated 15 percent of the 7.2 million households with blind, aged, and disabled individuals receiving Supplemental Security Income (SSI) cash benefits included more than one SSI recipient, according to GAO's data analysis. Of the estimated 1.1 million households with multiple SSI recipients, most included two recipients (953,000) and at least one adult recipient between ages 18 and 64 (695,000). Most households with multiple recipients did not have any child recipients, though an estimated 190,000 had one child recipient, 111,000 had two, and 30,000 had three or more. Few households reported having married couple recipients (an estimated 90,000). Most multiple recipient households reported that members of one family—those related by birth, marriage, or adoption—lived in the household (an estimated 941,000). GAO was unable to determine the specific relationships of recipients in these households.

The Social Security Administration (SSA) provided households with multiple SSI recipients almost 30 percent, or an estimated \$1.2 billion, of the total \$4.3 billion paid in SSI benefits in May 2013, according to GAO's data analysis. In that month, multiple recipient households received an estimated average of \$1,131 in SSI benefits, compared to \$507 for single recipient households. Further, consistent with federal law that applies a lower maximum benefit rate to married couple recipients, GAO's analysis found that households with nonmarried multiple recipients received a higher estimated average monthly benefit payment than married recipient households.

Since the 1990s, several alternative benefit structures for households with multiple SSI recipients have been discussed, but the potential effects of any such change on program costs and recipients are largely unknown. Specifically, reducing the maximum benefit limit for these households would likely decrease benefit costs, according to analyses GAO reviewed; however, the potential effects of such a change on program administrative costs and SSI recipients have not been studied. Further, according to SSA staff, SSA's claims management system lacks the ability to automatically connect and adjust claim records of those living in households with other SSI recipients, as it is structured around providing benefits to individuals. For example, if a mother lives with two of her children who are both SSI recipients, and the mother reports changes to her income, SSA's system does not automatically adjust both children's benefit amounts to account for this change in income. In addition, the system is unable to automatically process claims when two SSI recipients marry or separate, so staff must manually complete forms and calculate benefits outside the claims management system, which is time consuming and error prone, according to staff GAO spoke with in three of five selected field offices. SSA officials said the agency has not assessed the risks associated with the system's limited ability to automatically process claims for multiple recipient households, and has no plans to improve the claims management system to address related issues. According to federal internal control standards, agencies should design their information systems to support the completeness, accuracy, and validity of information needed to achieve objectives. Without assessing risks and making changes to address the issues related to households with multiple SSI recipients, SSA is at increased risk of making improper payments to recipients who live with, marry, or separate from other recipients.

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### Abbreviations

HHS	U.S. Department of Health and Human Services
ISM	In-kind Support and Maintenance
MSSICS	Modernized Supplemental Security Income Claims Systems
SIPP	Survey of Income and Program Participation
SNAP	Supplemental Nutrition Assistance Program
SSA	Social Security Administration
SSI	Supplemental Security Income
SSR	Supplemental Security Record
TANF	Temporary Assistance for Needy Families

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August 17, 2016

The Honorable Charles Boustany  
Chairman  
Subcommittee on Tax Policy  
Committee on Ways and Means  
House of Representatives

The Honorable Vern Buchanan  
Chairman  
Subcommittee on Human Resources  
Committee on Ways and Means  
House of Representatives

The Supplemental Security Income (SSI) program, which provides cash benefits to eligible aged, blind, and disabled individuals with limited financial means, has significantly expanded over time, both in terms of federal outlays and the number of program recipients. The Social Security Administration (SSA) administers the program and paid almost \$55 billion in federally funded SSI benefits to about 8.4 million individual recipients in fiscal year 2015. Maximum monthly SSI benefits are generally adjusted annually, and an eligible individual's income from other sources reduces the individual's monthly SSI benefit. Generally, SSI recipients are eligible to receive up to a maximum benefit amount, though the maximum is lower for married couple recipients. Other households with more than one SSI recipient, such as those with multiple child recipients or those with multiple nonmarried adult recipients, are not subject to this benefit reduction. This benefit structure differs from other programs for low-income people that generally consider household or family size when determining benefit amounts.<sup>1</sup>

Since the 1990s, advocacy groups, members of Congress, and SSA officials have discussed alternative benefit structures for SSI. For example, some options include eliminating the benefit reduction for married couple recipients or applying a reduction to all nonmarried

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<sup>1</sup>For example, the income and size of the household is considered to determine eligibility and benefit amounts for the Supplemental Nutrition Assistance Program (SNAP); however, marital status is not considered. See 7 U.S.C. § 2017(a).

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multiple SSI recipient households, and the SSA Office of the Inspector General has reported that the latter policy change could result in significant cost savings. To inform consideration of potential changes to the SSI benefit structure, you asked us to provide information on households that include multiple SSI recipients.

This report assessed what is known about 1) households that have multiple SSI recipients, 2) SSI benefits that those households receive, and 3) the potential effects of implementing a change in the amount of benefits received by these households on program administration and other factors.

To address these objectives, we reviewed relevant federal laws, regulations, program guidance, and key agency documents, including SSA's Program Operations Manual System,<sup>2</sup> 2014-2018 Agency Strategic Plan,<sup>3</sup> SSA Vision 2025: Innovative Organization,<sup>4</sup> and SSA's Fiscal Year 2017 Federal Budget Justification.<sup>5</sup> To describe households with multiple SSI recipients and their benefits, we analyzed SSA administrative data on SSI recipients and benefits in May 2013, matched to U.S. Census Bureau survey data on household characteristics in that month, the most recent matched data available.<sup>6</sup> We assessed the reliability of these data through interviews with relevant officials and reviews of relevant documentation and electronic data testing, and we determined they were sufficiently reliable for our purposes. To gather

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<sup>2</sup>SSA, *Program Operations Manual System (POMS)*.

<sup>3</sup>SSA, *Agency Strategic Plan Fiscal Years 2014-2018* (Baltimore, MD).

<sup>4</sup>SSA, *Vision 2025: Innovative Organization*, accessed March 8, 2016, <https://www.ssa.gov/vision2025/materials/vision2025.pdf>. This document outlines SSA's plans for 2015-2025.

<sup>5</sup>SSA, *Fiscal Year 2017 Federal Budget Justification*, accessed Feb. 19, 2016, <https://www.ssa.gov/budget/FY17Files/2017FCJ.pdf>.

<sup>6</sup>Specifically we used the U.S. Census Bureau's *Survey of Income and Program Participation* (SIPP). Because SIPP is a household sample survey, the sample of SSI recipients is only one of a large number of samples that the survey might have drawn. Since each sample could have provided different estimates, we express our confidence in the precision of a particular sample's results as a 95 percent confidence interval (e.g., plus or minus 7 percentage points). This is the interval that would contain the actual population value for 95 percent of the samples that the survey could have drawn. For additional information see appendix I.

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information for all of the objectives, we interviewed SSA staff at headquarters and five field offices regarding the characteristics of multiple recipient households and SSA's administration of SSI claims for individual recipients and multiple recipient households. Field offices were selected to include offices serving substantial numbers of SSI recipients and to provide variation in geographic location, and the information provided by staff from these offices is not generalizable to all field offices nationwide. To understand how changing the amount of benefits received by multiple recipient households may potentially affect SSA, we compared the information SSA staff provided to the agency documents noted above and to the Standards for Internal Control in the Federal Government as they relate to both program goals and objectives, as well as the agency's processes and procedures for managing SSI claims for this population.

To gather additional information, we also interviewed staff from disability advocacy organizations and other relevant stakeholder groups, as well as researchers who have studied the SSI population.<sup>7</sup> Further, we reviewed relevant studies on the SSI population specifically, and the disabled population more generally, including studies that addressed disability-related costs and trends in living arrangements, for example. To understand the potential effects of changing an SSI recipient's benefits on other federal benefit programs, we reviewed relevant program laws, regulations, and other information for three federal programs selected because they serve large numbers of low-income individuals and households with SSI recipients may be eligible to receive benefits from them. For more information about our objectives, scope, and methodology, see appendix I.

We conducted this performance audit from March 2015 to August 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

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<sup>7</sup>We selected researchers identified through our literature search as having conducted studies on SSI recipients in general, or multiple recipient households in particular, and who represent a range of views on SSI policy issues. Similarly, we selected disability rights advocates who have experience working with SSI recipients, and, to the extent possible, multiple SSI recipient households.

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the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

The SSI program was established in 1972 under Title XVI of the Social Security Act and provides payments to low-income aged, blind, and disabled persons—both adults and children—who meet eligibility requirements.<sup>8</sup> SSA administers the SSI program through more than 1,200 field offices around the country where staff process applications for benefits, verify financial eligibility, and compute benefit amounts. Following SSA's initial review, state disability determination services offices assess applicants' medical eligibility for SSI.<sup>9</sup> In order to be eligible for SSI benefits based on a disability, an individual must have a medically determinable physical or mental impairment that (1) prevents the individual from engaging in any substantial gainful activity, and (2) has lasted or is expected to last at least 1 year or result in death.<sup>10</sup> After a person is found to be eligible for SSI and begins receiving benefits, SSA conducts periodic redeterminations of financial eligibility and continuing

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<sup>8</sup>The SSI program was established by the Social Security Amendments of 1972 and became effective in 1974. Pub. L. No. 92-603, § 301, 86 Stat. 1329, 1465 (codified as amended at 42 U.S.C. §§ 1381-1383f).

<sup>9</sup>The state disability determination services, which are fully funded by the federal government, are state agencies responsible for developing medical evidence and making the initial determination on whether or not a claimant is disabled or blind under the law. See <https://www.ssa.gov/disability/determination.htm>.

<sup>10</sup>42 U.S.C. § 1382c(a)(3). The impairment must be of such severity that the individual is not only unable to do his or her previous work, but also cannot engage in any other kind of substantial gainful work which exists in the national economy. Substantial gainful activity is generally work activity involving significant physical or mental activities that are done for pay or profit, whether or not a profit is realized. 20 C.F.R. § 416.972. A person who is earning more than a certain monthly amount is ordinarily considered by SSA to be engaging in substantial gainful activity. For 2016, the substantial gainful activity threshold is \$1,820 per month for blind recipients and \$1,130 per month for individuals with other disabilities.

A child under age 18 may qualify as disabled if he or she has an impairment that results in "marked and severe functional limitations." 42 U.S.C. § 1382c(a)(3)(C). Different considerations also apply when determining whether individuals are blind for SSI eligibility purposes. Adults aged 65 or older may qualify for SSI benefits without being disabled.

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disability reviews to ensure that only recipients who remain medically eligible continue to receive SSI benefits.<sup>11</sup>

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## Determination of Financial Eligibility and Benefits

To be financially eligible for SSI, individuals must meet program income and resource requirements. Specifically, in 2016, an individual recipient's or married couple recipient's monthly countable income<sup>12</sup> must be less than the maximum monthly federal SSI benefit rate of \$733 per month for an individual and \$1,100 per month for a married couple.<sup>13</sup> Generally, SSI recipients are eligible to receive up to a maximum benefit rate, with married couple recipients eligible for a lower maximum benefit rate approximately equal to 75 percent of the benefit rate for nonmarried individuals.<sup>14</sup> Further, an individual's or couple's countable resources

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<sup>11</sup>SSA's regulations pertaining to continuing disability reviews for SSI can be found at 20 C.F.R. § 416.989 et seq. Continuing disability reviews are generally conducted every 6 to 18 months, 3 years, or 5 to 7 years, depending on the nature of the recipient's disability. 20 C.F.R. § 416.990(d).

<sup>12</sup>Certain types of income, such as refunds from federal income taxes related to the Earned Income Tax Credit, are excluded under the SSI program by the Social Security Act. 42 U.S.C. § 1382a(b). For a list of types of income excluded under the SSI program as provided by federal laws other than the Social Security Act, see the appendix to 20 C.F.R. Part 416 subpart K.

<sup>13</sup>SSA, *SSI Federal Payment Amounts, 1975-2016*, accessed April 19, 2016, <https://www.ssa.gov/oact/cola/SSIAMts.html>. All recipients generally have their SSI benefits reduced by the amount of the recipient's income; however, the starting maximum payment amount is different for married couples who are recipients compared to other multiple recipient households. 42 U.S.C. § 1382(b).

<sup>14</sup>Under federal law for the SSI program, the lower maximum benefit rate is technically applicable to individuals who have an "eligible spouse," and an "eligible spouse" is generally defined as an aged, blind, or disabled individual who is the spouse of another aged, blind, or disabled individual, and who is living with that individual. 42 U.S.C. § 1382c(b). For ease of reporting, throughout this report we generally refer to individuals with an eligible spouse as "married couple recipients" and individuals without an eligible spouse as "nonmarried."

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(such as financial institution accounts) must be \$2,000 or less for individuals and \$3,000 or less for married couple recipients in 2016.<sup>15</sup>

Although SSI is a benefit for an individual, SSA generally considers income of certain other people in the household when determining the amount of an individual's SSI benefit to reflect a family member's responsibility for certain other family members.<sup>16</sup> For example, a parent's or spouse's income is generally included as part of the income of a child or spouse, respectively, living in the same household. Therefore, if the SSI recipient lives with a spouse who does not receive SSI benefits, SSA considers the income of that spouse when determining the recipient's SSI benefit amount, potentially reducing the benefit payment.

Similarly, food and shelter that an individual receives from others, referred to as in-kind support and maintenance (ISM), is also considered by SSA when determining an individual's benefit amount. In situations where the householder is providing both food and shelter to an individual, SSA decreases the recipient's SSI benefit by an amount equal to one-third of the federal benefit rate to account for ISM.<sup>17</sup> In all other situations in which an individual is receiving ISM, SSA counts the presumed value of the food or shelter-related items received by the SSI recipient in-kind (including such assistance provided by individuals who do not live with the recipient) as unearned income, unless the recipient demonstrates that

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<sup>15</sup>According to SSA, countable resources include: cash; bank accounts, stocks, U.S. savings bonds; land; life insurance; personal property; vehicles; any other personal property which could be changed to cash and used for food or shelter; and deemed resources. However, a recipient's home or vehicle are not countable resources. SSA, *Understanding Supplemental Security Income SSI Resources—2015 Edition*. Baltimore, MD: 2015.

<sup>16</sup>According to SSA's *Program Operations Manual System: (SI 01310.001 Role of Deeming)*, "deeming identifies the process of considering another person's income and resources to be available for meeting an SSI claimant's (or recipient's) basic needs of food and shelter." Further, it states that "[t]he deeming provisions [of the Social Security Act] recognize some measure of family responsibility as they apply from spouse-to-spouse or parent-to-child."

<sup>17</sup>To ensure SSA calculates ISM correctly, SSA determines the living arrangement of the SSI recipient, essentially understanding with whom the recipient lives. SSA field office staff determine a recipient's living arrangement based on information self-reported by SSI applicants or recipients and corroborated by another knowledgeable person, if needed. SSA, *Program Operations Manual System (SI 00835.001: Introduction to Living Arrangements and In-Kind Support and Maintenance)*.

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the actual value is less than the presumed value, in which case SSA uses the actual value. However, the amount that the recipient's SSI benefit may be reduced in this manner is limited to an amount equal to one-third of the applicable benefit rate plus \$20.

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## Overview of SSA's Claims Management System

SSA operates two separate, but linked, systems to update and store SSI recipient information and process benefits: the Supplemental Security Record (SSR) and Modernized Supplemental Security Income Claims Systems (MSSICS). Field office staff use SSR to calculate benefits, including any reductions to benefits from ISM, based on information retrieved from MSSICS. MSSICS, an online data collection system, is used by field office staff to collect recipient information. MSSICS houses data such as whether the individual lives alone, owns a house, has certain kinds of expenses, and what, if any, financial support the person receives from others. MSSICS stores information like a paper file. When SSA staff need to update records, they can open the recipient's file and make changes electronically. Overall, SSA's database systems are 40 years old, and the agency plans to expand their capabilities through a multiple-year initiative beginning in fiscal year 2017.

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## Programs for Low-Income Individuals and Families

We previously reported that SSI is one of over 80 federal programs that target low-income individuals, families, and communities to help them meet basic needs or provide other assistance.<sup>18</sup> We reported that financial and nonfinancial eligibility requirements are established for each program, with financial requirements generally limiting eligibility to individuals, families, or households with income and assets below defined

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<sup>18</sup>GAO, *Federal Low-Income Programs: Multiple Programs Target Diverse Populations and Needs*, [GAO-15-516](#) (Washington, D.C.: July 30, 2015). Our prior report collected information on a number of federal low-income programs by surveying the federal agencies that administer the programs. We reported that SSI and other programs for low-income individuals and families are distinct from social insurance programs such as Social Security, Medicare, Unemployment Insurance, or Social Security Disability Insurance (SSDI), which are generally financed by contributions from workers and employers, and eligibility for benefits is determined, at least in part, on the basis of an individual's work history.

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levels.<sup>19</sup> In some circumstances, federal law extends automatic eligibility for one program for low-income people based on an applicant's participation in another program. Such provisions can simplify the application and eligibility determination process for applicants and reduce the time program administrators spend verifying applicants' income and resources. In most states, SSI recipients are automatically eligible for Medicaid health insurance<sup>20</sup> and, if they live alone or in households in which all members receive SSI benefits, are automatically eligible for the Supplemental Nutrition Assistance Program (SNAP).<sup>21</sup>

Medicaid is a joint federal-state program that finances health insurance coverage for certain low-income individuals.<sup>22</sup> An estimated 65 million low-income individuals were covered by Medicaid in fiscal year 2014, and the Centers for Medicare and Medicaid Services report that enrollment

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<sup>19</sup>Federal rules govern how each program counts income and assets at the individual, family, or household level and how benefits are distributed to individuals, families, or households. Nonfinancial requirements for each program restrict eligibility to specified categories of beneficiaries, such as pregnant women, children, or individuals with disabilities. [GAO-15-516](#).

<sup>20</sup>See 42 U.S.C. § 1396a(a)(10)(A)(i)(II). States administer the Medicaid program, yet SSI recipients' eligibility for Medicaid is sometimes determined by SSA. According to SSA's Program Operations Manual System, as of May 2016, 33 states and the District of Columbia have agreements with SSA to determine SSI recipients' eligibility for Medicaid. In these states, the SSI application is also the Medicaid application. In the 17 additional states, individuals determined to be eligible for SSI need to separately apply for Medicaid through their state's Medicaid application. Seven of those states use SSI eligibility criteria for Medicaid, and the remaining 10 states use at least one eligibility criterion more restrictive than SSI to determine whether an SSI recipient is eligible for the program. SSA, *Program Operations Manual System (SI 01715.010: Medicaid and the Supplemental Security Income (SSI) Program)*.

<sup>21</sup>See 7 U.S.C. § 2014(a). With the exception of California (see 7 C.F.R. § 273.20(a)), which converts the value of SNAP benefits to cash payments that are included in additional state provided benefits for SSI recipients, SSI recipients may be eligible to receive SNAP. If all household members receive SSI, the household is categorically eligible for SNAP and does not need to meet SNAP's financial eligibility standards. However, if SSI recipients live in households with others who do not receive SSI benefits, the household must meet the SNAP financial eligibility standards to qualify for SNAP benefits.

<sup>22</sup>The Social Security Act, which was amended in 1965 to establish the Medicaid program, provides the statutory framework for the program, setting broad parameters for states that choose to participate and implement their own Medicaid programs. Centers for Medicare and Medicaid Services oversees state Medicaid programs to ensure compliance with federal requirements.

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has been growing under the Patient Protection and Affordable Care Act.<sup>23</sup> Medicaid allows significant flexibility for states to design and implement their programs; however, each state Medicaid program, by federal law, must cover certain categories of individuals and provide a broad array of benefits. Medicaid benefits are not adjusted based on an eligible individual's income level.

SNAP is intended to help low-income households obtain a better diet by providing benefits to purchase food. SNAP is the largest of 15 domestic food and nutrition assistance programs overseen by the U.S. Department of Agriculture's Food and Nutrition Service.<sup>24</sup> States administer the program by determining whether households meet the program's eligibility requirements, calculating monthly benefits for qualified households, and issuing benefits to them. A household generally includes everyone who lives together and purchases and prepares meals together.<sup>25</sup> An SSI recipient is generally automatically eligible to receive SNAP benefits, if they live alone or in households in which all members receive SSI benefits, and an individual's monthly SSI benefit is counted as income when determining the individual's SNAP benefits. In contrast, for the purposes of SSI benefit determination, the amount of SNAP benefits an SSI recipient receives is excluded.

Medicaid and SNAP are not the only other federal assistance programs available to aged, blind, or disabled individuals with limited means. For example, monthly cash assistance is available to qualifying low-income families with children through the Temporary Assistance for Needy Families (TANF) block grant, administered by the U.S. Department of Health and Human Services (HHS). TANF provides federal funding to states, which states are required to supplement with their own funds, to provide cash assistance and a variety of other benefits and services to meet the needs of low-income families with children. In addition to eligibility requirements related to the target population, TANF includes

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<sup>23</sup>Centers for Medicare and Medicaid Services, Office of the Actuary, *2014 Actuarial Report on the Financial Outlook for Medicaid* (Washington, D.C.: 2014).

<sup>24</sup>The Food and Nutrition Service jointly administers SNAP with the states, covering the full cost of SNAP benefits and approximately half of states' administrative costs.

<sup>25</sup>Members of the same household apply together, and their income, expenses, and assets normally are aggregated in determining eligibility and benefits.

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both work requirements and requirements related to time limits on individuals' receipt of TANF cash assistance benefits.<sup>26</sup> While there is no federal prohibition to simultaneous SSI and TANF eligibility, most states prohibit payment of TANF benefits to SSI recipients, according to HHS. If an SSI recipient does receive TANF cash assistance benefits, that person's benefit is counted dollar for dollar as income during SSI eligibility and benefit amount determinations.<sup>27</sup>

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## Multiple SSI Recipient Households Represented an Estimated 15 Percent of All SSI Households in May 2013

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<sup>26</sup>TANF requires states to engage a certain percentage of work-eligible recipients of TANF cash assistance in specified work activities (such as job search and job readiness activities) or face potential penalties. In general, federal law also limits federal TANF assistance for families with an adult member to 60 months (5 years). States may extend families beyond this 60-month period for various reasons, including hardship for up to 20 percent of their caseloads.

<sup>27</sup>SSA's *Program Operations Manual System (SI 00830.403)* stipulates that a claimant's share of a TANF grant is counted dollar for dollar as income but is not subject to the \$20 general income exclusion.

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Households with Multiple SSI Recipients Represented an Estimated 15 Percent of All Households with SSI Recipients and Typically Included Two Nonmarried Recipients

In May 2013, an estimated 15 percent of all households with SSI recipients included more than one SSI recipient (1.1 million households), according to our analysis of matched administrative and survey data.<sup>28</sup> Specifically, households with married couple recipients<sup>29</sup> represented an estimated 1.2 percent of all SSI recipient households; while 13.8 percent of SSI households were comprised of nonmarried multiple recipients (see fig. 1).<sup>30</sup> Households with nonmarried multiple recipients include combinations of related or unrelated recipients living together, such as parents and children, siblings, or roommates. The vast majority of multiple recipient households reported having a one-family household (an estimated 86.7 percent or 941,000 households), with “family” defined as a group of two or more persons related by birth, marriage, or adoption who

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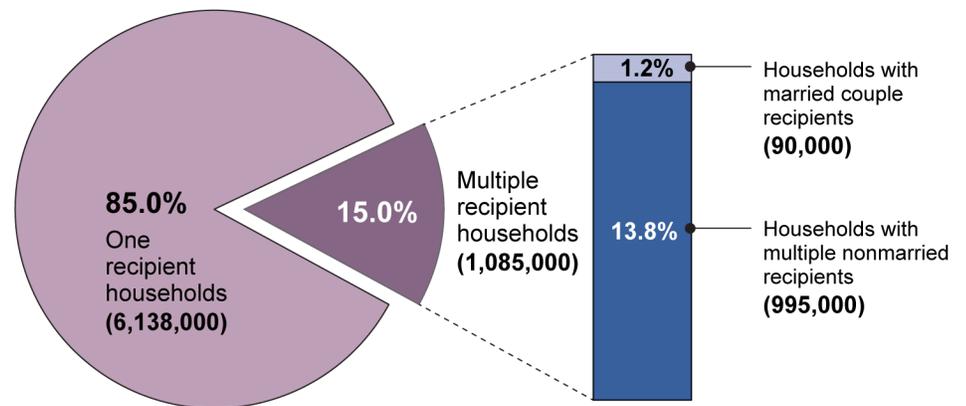
<sup>28</sup>Our estimates are based on data from the 2008 panel of SIPP matched to the SSR at the individual level. Estimates for specific time periods are based on relevant waves of this multi-year, longitudinal survey. We made estimates for the civilian, non-institutionalized population of SSI recipients, consistent with the SIPP’s target population. We used the SIPP to identify recipients who lived in the same household and to identify families living in each household, and we used the SSR for all other information about the recipients. We used the Census Bureau’s definition of a household (all people who occupy a housing unit, regardless of their relationships to each other) and we define a “multiple recipient household” as one that had two or more SSI recipients present. SSI recipients living in public institutions and noninstitutionalized group quarters were not counted in our analysis, in part due to differences in program rules for the former recipients. Appendix I describes the methods used for our analysis, and appendix II includes the sampling errors of all estimates, in more detail.

<sup>29</sup>We define a “married couple recipient household” as a household with a married couple present in which both spouses are SSI recipients. This is a type of multiple recipient household and may include zero or more additional SSI recipients. Two individuals are married for SSI purposes if they are: legally married under the laws of the state where they make their permanent home, entitled to Title II benefits, one as the spouse of the other, or living together in the same household and holding themselves out as a married couple to the community in which they live, according to *Program Operations Manual System (SI 00501.150 Determining Whether a Marital Relationship Exists)*. Marital status is self-attested by SSI claimants during the application process. Households in which an SSI recipient is married to a non-recipient resident of the household are not included in this category.

<sup>30</sup>For the purposes of this report, we are defining a “household with nonmarried multiple recipients” as a household with two or more SSI recipients, in which the recipients reported that they are not married to each other. These households are a type of multiple recipient household.

reside together.<sup>31</sup> Based on our analysis of households with SSI recipients, we were unable to detect any changes in the proportions of one recipient and multiple recipient households, respectively, from 2009 to 2013.<sup>32</sup>

**Figure 1: Supplemental Security Income Recipient Households by Household Type, May 2013**



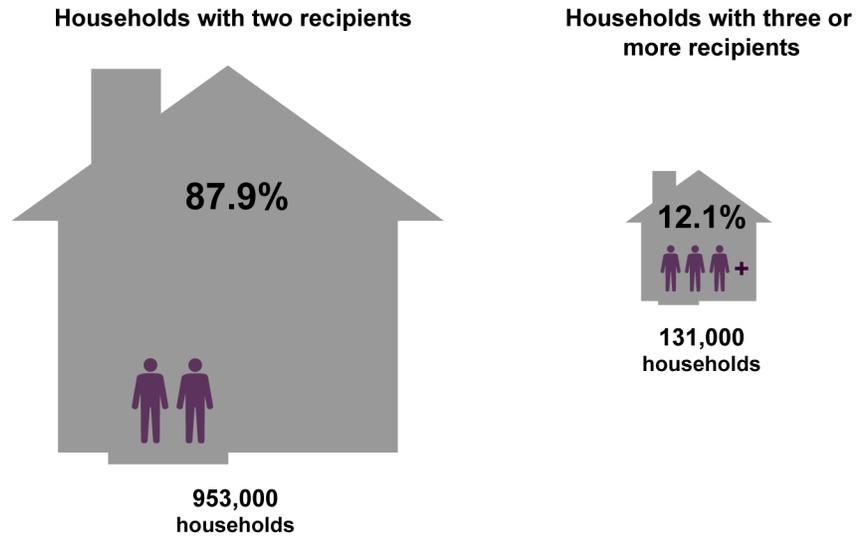
Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

A vast majority of multiple recipient households had two SSI recipients (see fig. 2). Specifically, an estimated 953,000 of the 1.1 million multiple recipient households in May 2013 included two recipients, while an estimated 131,000 households included three or more recipients.

<sup>31</sup>According to the U.S. Census Bureau's SIPP, a family is defined as a group of two or more persons related by birth, marriage, or adoption who reside together. Individuals who live alone or with only nonrelatives are defined as one-person families. Family relationships are self-attested to by SIPP survey respondents and not additionally verified by the U.S. Census Bureau.

<sup>32</sup>Specifically, we are 95 percent confident that the proportion of multiple recipient households decreased by as much as 5 percentage points or increased by no more than 5 percentage points during this period.

**Figure 2: Percent of Multiple Supplemental Security Income Recipient Households by Number of Recipients, May 2013**

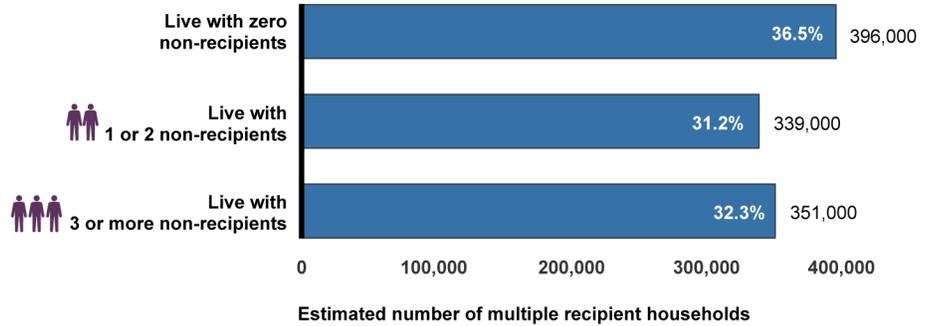


Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

SSI recipients living in multiple recipient households often shared their households with other individuals who did not receive SSI benefits (non-recipients). Almost two-thirds of multiple recipient households included at least one non-recipient (see fig. 3) and, as previously noted, most multiple recipient households reported being members of one family.<sup>33</sup> As such, multiple recipient households may include a parent and child who both receive SSI benefits along with another parent who does not receive benefits, for example.

<sup>33</sup>Non-recipients were similarly distributed across one-recipient households. See appendix II for detailed estimates.

**Figure 3: Multiple Supplemental Security Income Recipient Households by Number of Non-Recipients, May 2013**



Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

Note: Percentages may not add up to 100 due to rounding.

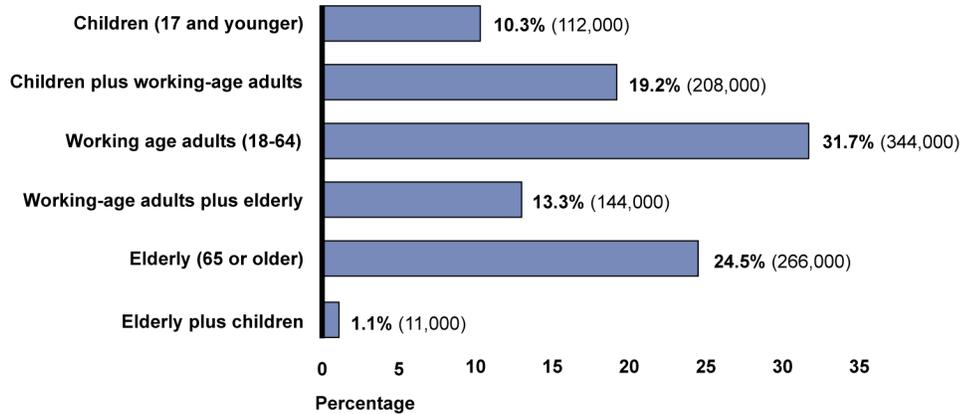
### Most Multiple Recipient Households Included Adult Recipients Who Did Not Have Any Earned Income

An estimated 695,000 of 1.1 million multiple recipient households included at least one working-age adult recipient in May 2013 (see fig. 4).<sup>34</sup> The most common recipient groupings in multiple recipient households were two or more working-age adult recipients or two or more elderly recipients. It was less common for multiple recipient households to have multiple generations of SSI recipients present, such as a combination of working-age adult recipients and child recipients, or working-age adult and elderly recipients.<sup>35</sup>

<sup>34</sup>These households may include zero or more additional non-recipient members. In May 2013, working-age SSI recipients represented nearly 60 percent of all SSI recipients regardless of household type, elderly recipients represented about 25 percent, and children represented almost 16 percent.

<sup>35</sup>We also analyzed the age composition of households with multiple recipients that included one family (an estimated 86.7 percent of households with multiple recipients). The age distribution within these households resembled the distribution in figure 4 for all multiple recipient households. Due to limitations in sample size, we did not analyze the age composition of the 13.3 percent of households with multiple recipients that included two or more families. See appendix II for more information.

**Figure 4: Multiple Supplemental Security Income Recipient Households by Age of Recipients, May 2013**

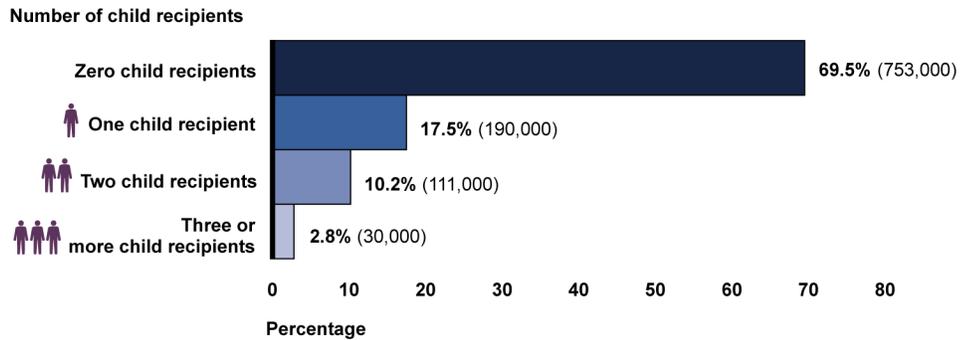


Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

Although representatives from some stakeholder groups and staff we interviewed at all five SSA field offices noted that, in their experience, multiple recipient households commonly included children, we found that an estimated 69.5 percent of multiple recipient households in May 2013 had no child recipients present (see fig. 5). For multiple recipient households with SSI recipient children in May 2013, most included only one child recipient, and it was rare for these households to have three or more child recipients.<sup>36</sup>

<sup>36</sup>SSA's Office of the Inspector General (OIG) focused on households with multiple children receiving SSI payments due to mental impairments in an audit report in March 2016, and highlighted households with four or more child SSI recipients in a management advisory report in August 2012. See: SSA OIG, *Households with Multiple Children Receiving Supplemental Security Income Payments Because of Mental Impairments*, A-08-14-14098 (Baltimore, MD: March 2016) and SSA OIG *Management Advisory Report: Supplemental Security Income Payments to Multi-recipient Households*, A-06-09-29149 (Baltimore, MD: August 2012).

**Figure 5: Number of Child Supplemental Security Income Recipients in Multiple Recipient Households, May 2013**



Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

Note: Percentages may not add up to 100 due to rounding.

Although SSA reports that a slightly greater percentage of SSI recipients were female, according to our analysis, a slightly greater percentage of SSI recipients in multiple recipient households were male in May 2013. Specifically, SSA reported that 53.4 percent of all SSI recipients were female in December 2013, and we found that 54.0 percent of SSI recipients in multiple recipient households were male in May 2013. This may be related to the fact that child SSI recipients were twice as likely to be male, according to SSA, and child recipients made up a slightly greater proportion of recipients in multiple recipient households than in the SSI recipient population as a whole, according to our analysis.<sup>37</sup>

The majority of multiple recipient households—an estimated 87.9 percent of which had two SSI recipients—reported no earned income and some unearned income in May 2013.<sup>38</sup> Further, the percentage of households

<sup>37</sup>In May 2013, child recipients represented 15.8 percent of the total SSI population. Our analysis found that 20 percent of all recipients in multiple recipient households were children in May 2013.

<sup>38</sup>Earned income includes wages and other forms of income, such as net earnings from self-employment, remuneration for work in a sheltered workshop, royalties on published work, and honoraria for services rendered. See 42 U.S.C. § 1382a(a)(1). Unearned income refers to all income that is not earned income, such as support and maintenance furnished in cash or kind, and any payments received as an annuity, pension, retirement, or disability benefit. 42 U.S.C. § 1382a(a)(2).

that reported earned income and the average amount of earned income per household were similar across one recipient and multiple recipient households (see table 1).<sup>39</sup> In contrast, although the majority of both one and multiple recipient households reported receiving unearned income, the average amount of unearned income reported by multiple recipient households was greater than that reported by one recipient households.<sup>40</sup>

**Table 1: Estimated Earned and Unearned Income Received by One and Multiple Supplemental Security Income Recipient Households in May 2013**

Household Type	Estimated Earned Income		Estimated Unearned Income	
	% of households that reported receiving earned income	Average amount (\$)	% of households that reported receiving unearned income	Average amount (\$)
<b>One recipient households</b>	2.0%	\$188.60	52.5%	\$456.50
<b>Multiple recipient households</b>	3.2%	\$147.50	60.2%	\$622.10

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

## Recipients' Living Arrangements May Be Driven by Various Factors

According to staff from SSA headquarters and our selected field offices, as well as disability rights advocates, and researchers, SSI recipients may make living arrangement decisions for various reasons. These may include family relationships and the role of genetics in the development of similar health conditions among family members. Married couples, parents and children, and extended families often share households because they are related. Further, some researchers we spoke with suggested that shared genetic conditions among parents or siblings could result in multiple members of the same household having the same disability, or a disability on the same illness spectrum.

<sup>39</sup>In each year, 2009 through 2013, we estimated that no more than 9 percent of multiple recipient households had reported earned income. The upper bound of the 95 percent confidence interval of the estimate for each year, respectively, did not exceed 9 percentage points.

<sup>40</sup>The difference in the average amount of unearned income received by one recipient and multiple recipient households was statistically significant.

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The potential network effect resulting from individuals living in close proximity and sharing information was another factor cited by groups we spoke with that may increase the likelihood of SSI recipients living together. Network effects potentially reduce perceived barriers to applying for benefits for individuals who may be eligible, and could increase the prevalence of multiple recipient households. Specifically, SSA field office staff and representatives of a disability rights advocate group we spoke with described word-of-mouth communication among potentially eligible individuals as one way that applicants learn about the SSI program. According to one researcher we spoke to, some applicants may hear from others how to navigate the application and appeals process for SSI benefits, thus increasing their likelihood of applying.

The supportive care that comes from living with others may also contribute to SSI recipients choosing to live together. According to disability advocates we spoke to, SSI recipients may group themselves into a community to increase connectedness, decrease isolation, and receive supportive care when needed. In addition, one researcher told us that SSI recipients might also need assistance coordinating care or arranging appointments, and SSI recipients with different impairments may fulfill complimentary functions for other household members.

A range of the stakeholders we spoke to, including SSA field office staff, disability advocates, and researchers, stated that economic factors may also contribute to the living arrangement decisions of SSI recipients. Specifically, according to these groups, SSI recipients may choose to live together in order to pool resources to share rent and other household expenses such as utilities or food. Additionally, current fair market rent levels often exceed SSI benefit rates, research shows. For example, according to one study, the national average fair market rent for one bedroom rental units was \$780 in 2014, and for studio/efficiency rental units was \$674 in 2014, or about 104 percent and 90 percent, respectively, of the maximum monthly SSI benefit payment in that year.<sup>41</sup>

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<sup>41</sup>Emily Cooper, Lauren Knott, Gina Schaak, Lisa Sloane, and Andrew Zovistoski. "Priced Out in 2014: The Housing Crisis for People with Disabilities," Technical Assistance Collaborative, Inc. and Consortium for Citizens with Disabilities, Housing Task Force, June 2015.

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In addition, SSA headquarters and field office staff, disability rights advocates, and researchers, with whom we spoke, stated that the recession may have exacerbated the economic factors that contribute to living arrangement decisions for SSI recipients. However, one researcher we spoke with noted that the effects of the recession varied by state. According to our analysis of matched administrative and survey data, the rate of multiple SSI recipient households with two families present decreased from an estimated 26 percent in 2010 to an estimated 10 percent in 2013.<sup>42</sup> This suggests that the 2007 to 2009 recession may have played a role in the family composition of households, which is consistent with other research that has found low-income people tend to combine households during recessions.<sup>43</sup>

Other factors related to the location and features of housing may influence SSI recipients' living arrangements, according to the groups with whom we spoke. In particular, these factors may contribute to a greater prevalence of multiple SSI recipient households in certain neighborhoods. For example, location-related factors noted by those we spoke with included proximity to accessible infrastructure and public systems such as transportation and schools. In addition, SSI recipients may need to live in housing units with universal accessibility features such as no-step entry, single-floor living, lever-style door handles, accessible electrical controls, and extra-wide doors and hallways. However, one study found that in 2011 less than 1 percent of U.S. rental housing units—roughly 365,800 units—included all five of these accessibility features.<sup>44</sup>

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<sup>42</sup>This change between time periods was statistically distinguishable from zero at the 0.05 confidence level.

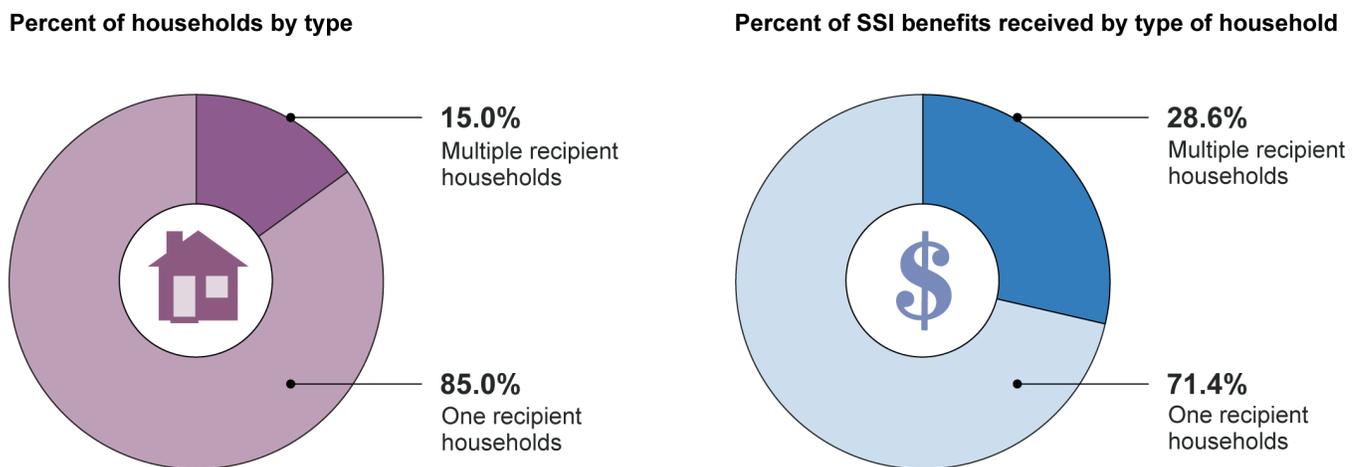
<sup>43</sup>Laryssa Mykyta and Suzanne Macartney. "Sharing a Household: Household Composition and Economic Well-Being: 2007-2010." U.S. Census Bureau (June 2012).

<sup>44</sup>*America's Rental Housing: Expanding Options for Diverse and Growing Demand*. Joint Center for Housing Studies of Harvard University, 2015.

## Multiple Recipient Households Received an Estimated 30 Percent of All SSI Benefits in May 2013

In May 2013, the estimated 15 percent of all SSI households that had multiple recipients received an estimated 28.6 percent of all SSI benefits, or approximately \$1.2 billion, according to our analysis of matched administrative and survey data.<sup>45</sup> (See fig. 6.) Because the total amount of SSI benefits received by a household includes benefits for all recipient residents, households with multiple recipients received higher monthly average SSI benefit payments (an estimated \$1,131) compared to households with one recipient (an estimated \$507).

**Figure 6: Estimated Percentage of Supplemental Security Income Benefits Received, by Recipient Household Type, May 2013**



Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

Marital status was also associated with different household benefit amounts. Households with nonmarried multiple recipients received a higher estimated average monthly benefit payment than married recipient

<sup>45</sup>This total includes any past-due benefits recipients received in May 2013, the period of this analysis. According to SSA's *Program Operations Manual System (SI 02101.010)*, past-due benefits include: benefits due, but unpaid, that accrued before the month payment was made; benefits due, but unpaid, that accrued during a period of suspension for which the recipient was subsequently determined to have been eligible; or any adjustment to benefits that results in an accrual of unpaid benefits.

households (see table 2). This is consistent with federal statute which stipulates a lower maximum benefit rate for married couple recipients, and those rates were \$1,066 per couple or \$533 per recipient in 2013. In comparison, all other recipients were not subject to this reduction and were eligible to receive up to \$710 in 2013.

**Table 2: Estimated Supplemental Security Income Benefits Received, by Household Type, May 2013**

Household Type	Total Estimated Number of Households (in millions)	Total Estimated Supplemental Security Income Benefits Received (in millions)	Average Estimated Monthly Benefit Amount per Recipient	Average Estimated Monthly Benefit Amount per Household
<b>Multiple recipient households</b>	<b>1.1</b>	<b>\$1,227</b>	\$542	\$1,131
Married recipient households	0.1	\$89	\$488	\$983
Households with nonmarried multiple recipients	1.0	\$1,139	\$546	\$1,144
<b>One recipient households</b>	<b>6.1</b>	<b>\$3,059</b>	\$513 <sup>a</sup>	\$507 <sup>a</sup>
<b>Total households with SSI recipients</b>	<b>7.2</b>	<b>\$4,286</b>	<b>\$521</b>	<b>\$602</b>

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

Note: The SSI benefit amounts reflected in this table include any past-due benefits recipients received in May 2013, the period of this analysis.

<sup>a</sup>Because the average estimates are constructed with different weights to account for household and recipient level samples, these two estimates are not the same.

Households typically received SSI benefits close to the maximum benefit for which their recipients were eligible.<sup>46</sup> For example, in May 2013, monthly benefit amounts for most multiple recipient households were over \$1,000,<sup>47</sup> while monthly benefit amounts for most households with one

<sup>46</sup>According to our analysis, there was not a statistically significant difference in the proportion of recipients in multiple recipient households who received the maximum benefit amount and those living in one recipient households who received the maximum in May 2013.

<sup>47</sup>In May 2013, an estimated 45.6 percent of all multiple recipient households received between \$1,000 and \$1,499 in SSI benefits (with a 95 percent confidence interval of 38.1 percent to 53.4 percent), while an estimated 8.2 percent received between \$1,500 and \$1,999 (with a 95 percent confidence interval of 4.8 percent to 12.7 percent), and an estimated 4.1 percent received between \$2,000 and \$2,499 (with a 95 percent confidence interval of 1.9 percent and 7.6 percent).

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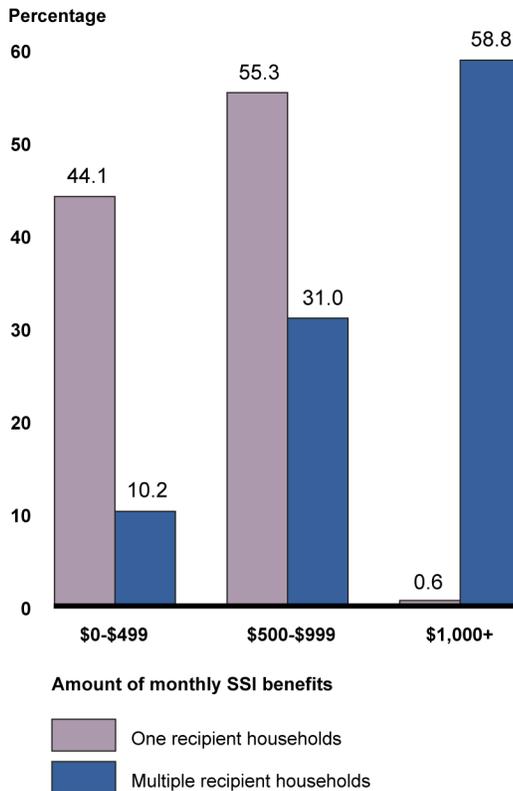
recipient were between \$500 and \$999.<sup>48</sup> (See fig.7) These findings show a concentration of households received benefits in the range of SSA's 2013 maximum benefit rates for individuals and married couple recipients.<sup>49</sup> These data on benefit amounts for households with one or multiple recipients are also consistent with our finding that an estimated 87.9 percent (953,000) of multiple recipient households had two SSI recipients in May 2013.

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<sup>48</sup>These reported benefit amounts may exceed the maximum monthly benefit amount because they include any past-due benefits that a recipient may have received in May 2013, the period upon which this analysis was based.

<sup>49</sup>The maximum federal benefit rate for individuals was \$710 and for married recipients was \$1,066 per couple, or \$533 per married recipient, in 2013.

**Figure 7: Estimated Amount of Monthly Supplemental Security Income Benefits Received by Multiple and One Recipient Households, May 2013**



Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

Note: The SSI benefit amounts reflected in this table include any past-due benefits recipients received in May 2013, the period of this analysis, and therefore may exceed monthly maximum benefit rates.

Child SSI recipients received the highest estimated average monthly SSI benefit amounts, regardless of whether they were the only recipient in a household or lived in a multiple recipient household (see fig. 8). Elderly SSI recipients received the lowest estimated average monthly benefit amounts. According to SSA officials, children receive higher SSI benefit amounts because they are less likely to have other sources of countable

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income that would reduce their benefits.<sup>50</sup> According to SSA's 2013 SSI Annual Statistical Supplement and Report, about 28 percent of all SSI recipients age 17 or younger had some other countable income, compared to about 43 percent of adults ages 18 to 64, and 69 percent of recipients age 65 or older.<sup>51</sup> Further, about two-thirds of all child recipients lived with one parent, and almost half of those parents had no other countable income.<sup>52</sup>

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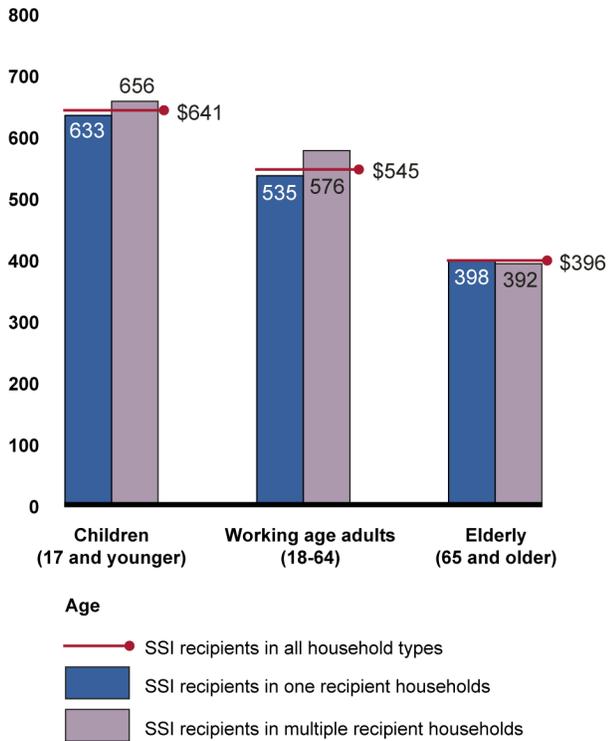
<sup>50</sup>According to SSA, "countable income" for SSI is income less all applicable exclusions. Income includes, for example, earned income, such as wages and net earnings from self-employment; and unearned income, such as Social Security benefits beyond SSI and pensions. Exclusions from income include, for example, the first \$20 of unearned income received in a month, the first \$65 of earned income in a month, the value of SNAP benefits received, certain income tax refunds related to the earned income tax credit, certain home energy assistance, and assistance based on need funded by a state or local government.

<sup>51</sup>Specifically, according to SSA's 2013 Annual Statistical Supplement, Table 7.D, in December 2012, of recipients 17 and younger: 7.6 percent received Social Security benefits beyond SSI, 20.2 percent received another form of unearned income, and 0.2 percent had earned income. Compared to recipients 18 to 64, where 30.8 percent received Social Security benefits beyond SSI, 6.9 percent received some other form of unearned income, and 4.8 percent had some form of earned income; and recipients 65 or older, where 56.1 percent received Social Security benefits beyond SSI, 11.3 percent received another form of unearned income, and 1.3 percent had some form of earned income.

<sup>52</sup>Specifically, according to the SSI Annual Statistical Report, 2013, Table 24, in December 2013, 67.3 percent of children under age 18 lived with one parent, and according to Table 25, 48.7 percent of these single parents had no income.

**Figure 8: Estimated Average Monthly Supplemental Security Income Benefit Per Recipient By Age and Household Type, May 2013**

Average payment (in dollars)



Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

Note: The SSI benefit amounts reflected in this table include any past-due benefits recipients received in May 2013, the period of this analysis, and therefore may exceed monthly maximum benefit rates.

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## The Effects of Changing Benefits for Multiple SSI Recipient Households Are Largely Unknown, and SSA Has Limited Ability to Electronically Manage Claims for Some of These Households

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### Options for Restructuring Benefits for Multiple SSI Recipient Households Have Been Discussed, but the Effects on SSI Program Costs, Households, and Other Programs Are Largely Unknown

Since the 1990s, members of Congress, SSA officials, and some advocacy groups have discussed alternative benefit structures for individuals living in multiple recipient households. Based on our interviews with SSA headquarters and field office staff, researchers, and representatives of advocacy groups, these previously considered alternatives generally involved either eliminating the benefit reduction for married recipients—so married recipients would have the same maximum benefit rate as individual recipients—or applying a similar reduction to other multiple recipient households. Although these alternatives have not been fully studied to determine the effects they may have on SSI recipients or SSA’s administration of the program, there is some information available on their potential effects on recipients and the program.<sup>53</sup>

### Eliminating the Benefit Reduction for Married SSI Recipients

Eliminating the benefit reduction for married SSI recipients—so they would have the same maximum benefit rate as individual recipients—would increase benefit equity, simplify administration of the program, and

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<sup>53</sup>To identify options that have been discussed since the 1990s for restructuring SSI benefits for households with multiple SSI recipients, we reviewed relevant literature and interviewed researchers who have studied the SSI population, as well as staff from SSA, disability advocacy organizations, and other relevant stakeholder groups. We also confirmed the list of identified options with SSA officials.

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also likely increase benefit costs, according to SSA staff and other groups with whom we spoke and research we reviewed. Because married recipients have a lower maximum benefit rate than nonmarried recipients, most disability advocates and researchers we spoke with said that married recipient households are treated inequitably. Further, according to SSA, the current benefit structure has led to some SSI recipients reporting a change in their marital status to avoid the benefit reduction. Specifically, SSA officials in 3 of the 5 selected field offices said that some SSI recipients, upon learning of the married couple benefit reduction, shortly thereafter return to the SSA office to tell SSA staff they have separated and are no longer living together.<sup>54</sup> According to SSI policy, the benefit reduction no longer applies if the SSI recipients divorce or no longer live in the same household, for example.<sup>55</sup> Eliminating the benefit reduction for married SSI recipient households would also simplify program administration overall, according to SSA headquarters staff, because there would then be one maximum benefit amount that applies to all recipients. However, such a change for married recipients would also likely increase SSI benefit costs. According to a 2003 SSA study, eliminating the benefit reduction policy for married recipient households could increase program costs by more than \$900 million annually.<sup>56</sup>

### Reducing the Maximum Benefit Rate for Other Households with Multiple SSI Recipients

Other alternative SSI benefit structures that have been considered focused on reducing the maximum benefit rates for different groups of nonmarried multiple recipient households. For example, the 1995 National Commission on Childhood Disability suggested reducing the maximum SSI benefit rate for households with multiple child SSI

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<sup>54</sup>This topic was not addressed in our interviews with the other two field offices.

<sup>55</sup>As mentioned earlier in this report, individuals must be married and living together in order to be an "eligible spouse." As a result, married individuals who no longer live together would not be subject to the benefit reduction. 42 U.S.C. § 1382c(b). SSA's *Program Operations Manual System (SI 02005.030)* states that eligible couple status ends when a member of the couple dies, the couple divorces, the holding out relationship ends, the couple no longer lives in the same household, or a member of the couple becomes ineligible. A holding out relationship, for SSI purposes, is defined by SSA as two individuals who live in the same household and hold themselves out as a married couple to the community in which they live.

<sup>56</sup>Richard Balkus, Susan Wilscke. *Treatment of Married Couples in the SSI Program*. Issue Paper No. 2003-01. December 2003.

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recipients.<sup>57</sup> Another alternative described by SSA in 2008 would replace the policy under which an SSI recipient's benefits are reduced to account for any in-kind support and maintenance they receive with a benefit reduction for all adult recipients living with other adult recipients. The report noted that administering the in-kind support and maintenance policy often requires month-to-month, recipient-by-recipient recomputations based on information that is unverifiable.<sup>58</sup> In addition, we have previously reported that administering the in-kind support and maintenance policy has become increasingly complex and is a primary cause for overpayments.<sup>59</sup> Another suggested alternative included applying a reduced maximum benefit rate to all households with two or more SSI recipients, which SSA examined in 2002.<sup>60</sup>

### **Potential Effects on Benefit and Administrative Costs**

If the maximum benefit rate for additional multiple SSI recipient households was reduced, SSI benefit costs would likely decrease, according to analyses we reviewed. Although not all of these alternative

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<sup>57</sup>The National Commission on Childhood Disability suggested establishing payments equal to the SSI federal benefit rate multiplied by the number of child recipients in the family and raised to the power of 0.7. *Supplemental Security Income for Children with Disabilities: Report to Congress of the National Commission on Childhood Disability*. Washington, D.C., October 1995.

<sup>58</sup>SSA researchers suggested replacing SSA's in-kind support and maintenance policy with a 7 to 10 percent benefit reduction for multiple adult SSI recipient households. The report added there is consensus among policymakers and program administrators that in-kind support and maintenance policies are complex, intrusive, and inequitable. Richard Balkus, James Sears, Susan Wilschke, and Bernard Wixon. *Simplifying the Supplemental Security Income Program: Options for Eliminating the Counting of In-kind Support and Maintenance*. Social Security Bulletin, Vol. 68 No. 4. 2008.

<sup>59</sup>GAO, *Supplemental Security Income: Progress Made in Detecting and Recovering Overpayments, but Management Attention Should Continue*, [GAO-02-849](#) (Washington, D.C.: Sept. 16, 2002). GAO, *Supplemental Security Income: SSA Has Taken Steps to Prevent and Detect Overpayments, but Additional Actions Could Be Taken to Improve Oversight*. [GAO-13-109](#) (Washington, D.C.: Dec. 14, 2012).

<sup>60</sup>An SSA Office of the Inspector General report, published in 2012, noted that, in 2002, economists in SSA's Office of Policy simulated the effect of providing each recipient in a multiple recipient household with a payment amount equal to 75 percent of the federal benefit rate, less countable income. Office of the Inspector General, Social Security Administration. *Supplemental Security Income Payments to Multi-Recipient Households: Management Advisory Report*, A-06-09-29149 (Aug. 7, 2012).

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benefit structures have been analyzed for cost savings, those that have provide some information on potential savings. For example, the Congressional Budget Office estimated a cost savings of approximately \$4.6 billion from fiscal years 2013 through 2022 if the benefit reduction for households with multiple SSI children suggested by the 1995 National Commission on Childhood Disability were to be implemented.<sup>61</sup> Further, SSA's Office of the Inspector General estimated a cost savings of approximately \$3 billion for calendar year 2011 if the reduced maximum benefit rate for married SSI recipients was extended to all households with two or more SSI recipients.<sup>62</sup>

SSA headquarters officials we spoke with reported that savings in benefit costs resulting from a reduction in the maximum benefit rate for additional multiple recipient households may be tempered by increases in administrative costs; however, SSA has no estimates to help determine any potential effect. SSA staff we spoke with in 3 of the 5 field offices said changing benefits for some SSI recipients also could result in an increase in field office workloads.<sup>63</sup> For example, staff from these three field offices said a change in the maximum benefit rate for some SSI recipients would result in more recipients visiting their field offices, and some added that there would be a need for new training for field office staff and outreach to inform recipients about the change. However, SSA has not previously assessed how field offices may be affected by changes in SSI policy, and therefore the full effects of extending the reduced maximum benefit beyond married SSI recipients on administrative processes and related program costs are unknown.

### **Potential Effects on SSI Recipients**

Concerning the potential effects on recipients of a reduction in the maximum benefit rate for multiple recipient households, some of the groups we spoke with discussed how such a change may affect

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<sup>61</sup> *Supplemental Security Income: An Overview*. Pub. No. 4450. Congress of the United States Congressional Budget Office. December 2012.

<sup>62</sup> Office of the Inspector General, Social Security Administration. *Management Advisory Report: Supplemental Security Income Payments to Multi-recipient Households*, A-06-09-29149, (Aug. 7, 2012).

<sup>63</sup> This topic was not addressed in our interviews with the other two field offices.

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recipients' financial situations, though research on these effects is limited. The reduced maximum benefit rate for married couple SSI recipients is based on the expectation that these couples realize economies of scale, according to previous SSA reports. In other words, married SSI recipients who live together are able to share certain household expenses, thus reducing the overall cost of housing and living expenses for each individual. Consistent with this, some SSA officials and researchers we spoke with told us that some multiple recipient households economize on living expenses, such as rent and food. However, disability advocacy officials from two organizations said that while recipients may share a living space, there may be certain out-of-pocket expenses that cannot be shared, such as medication or specific dietary requirements. While a 2006 report from SSA found that medical expenses for the majority of child SSI recipients were covered by health insurance rather than their SSI benefits,<sup>64</sup> the extent to which multiple recipient households realize economies of scale, and for what purposes recipients in these households use their SSI benefits, have not been studied, according to SSA officials and several researchers.<sup>65</sup>

A reduction in the maximum benefit rate for multiple recipient households may lead some SSI recipients to alter their living arrangements, according to groups with whom we spoke. Although the extent to which a benefit reduction leads to such changes has not been studied, as mentioned earlier, SSA field office staff told us that some married SSI recipients attempt to avoid the benefit reduction by telling SSA staff they have

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<sup>64</sup>In 2006, SSA reported that almost all SSI children were covered by some form of health insurance, and SSI benefit payments were not used to cover medical expenses for the overwhelming majority of children. Carrie Becker, Paul S. Davies, Howard Iams, Baylor Miller, Shanti Mulpuru, Chad Newcomb, Stephen Ressler, Kathleen Romig, and Kalman Rupp. *A Profile of Children with Disabilities Receiving SSI: Highlights from the National Survey of SSI Children and Families*. SSA Bulletin. Vol. 66. No. 2. 2005/2006.

<sup>65</sup>In addition, the extent to which a reduction in SSI benefits provided to these households would lead to increases in SSI recipients living in poverty, seeking assistance from institutions such as homeless shelters, or seeking additional income by engaging in employment have not been studied. While some researchers and disability advocates we spoke with said a reduction in the maximum benefit rate for multiple recipient households may lead some recipients to increase their efforts to seek employment in an attempt to replace lost benefits, others we spoke with said SSI recipients are less likely to make up a reduction in benefits through the labor market, so the income is more likely to be replaced through other benefit programs.

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separated and are no longer living together.<sup>66</sup> If a reduction in the maximum benefit rate is extended to include other multiple recipient households, affected SSI recipients may similarly take steps to avoid the benefit reduction, according to disability advocates, researchers, and SSA field office staff with whom we spoke. For example, some SSA field office staff said that families living with multiple SSI children may move their children to live with relatives to avoid a reduction in SSI benefits.

### **Potential Effects on Other Federal Programs for Low-Income Households and Individuals**

Because SSI recipients may be eligible to receive benefits from other federal programs for low-income households and individuals, these programs may be affected if a reduced maximum SSI benefit rate were to be extended to additional multiple recipient households, though the effects would likely vary by program. Federal programs that these households may also receive benefits from include, for example, Medicaid, TANF and SNAP. While the effects of changes in other federal means-tested programs, such as TANF, on SSI have been studied to some extent,<sup>67</sup> the reverse effect of SSI benefit changes on other federal programs has not. However, based on our assessment of relevant laws, regulations, other reports, and data for selected programs, the effects of a reduced SSI maximum benefit rate on other programs would likely vary based on each program's structure and rules and the extent to which SSI recipients already receive benefits from these other programs.

Medicaid, which many SSI recipients concurrently receive, would likely be minimally affected by the extension of the reduced maximum benefit rate to other multiple recipient households, based on our review of relevant program laws, regulations, other reports, and data. In most states, SSI

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<sup>66</sup>SSA's *Program Operations Manual System (SI 02005.030)* states that eligible couple status ends when a member of the couple dies, the couple divorces, the holding out relationship ends, the couple no longer lives in the same household, or a member of the couple becomes ineligible.

<sup>67</sup>Mark Nadel, Steve Wamhoff, and Michael Wiseman, *Disability, Welfare Reform, and Supplemental Security Income*. Social Security Bulletin, Vol. 65, No. 3, 2003/2004. Mary Farrell. *Connections between TANF and SSI: Lessons from the TANF/SSI Disability Transition Project*. OPRE Report 2013-57. Washington, DC: Office of Planning, Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services. December 2013.

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recipients are automatically eligible for Medicaid, and many currently receive Medicaid benefits.<sup>68</sup> For example, according to one SSA study, approximately 80 percent of individuals ages 18 to 64 received Medicaid coverage within a year of being deemed eligible for SSI.<sup>69</sup> Therefore, a reduction in SSI benefits may result in the small proportion of SSI recipients who are not currently enrolled in Medicaid applying for the program and receiving coverage. Further, because Medicaid benefits are adjusted based on eligibility and not on income level, an SSI recipient's Medicaid benefits would not be affected by a reduction in their SSI benefits so long as the recipient remains eligible for SSI.

TANF, which SSI recipients generally do not concurrently receive, would also likely be minimally affected by a reduction in the maximum benefit rate for additional multiple SSI recipient households, based on our review of relevant program laws, regulations, other reports, and recipient data. Although the federal government sets some requirements for TANF, states have broad flexibility to design their TANF programs, and most states do not allow individuals who receive SSI to simultaneously receive TANF monthly cash assistance benefits, according to the Department of Health and Human Services.<sup>70</sup> However, other family members, living in households with SSI recipients, may receive TANF cash assistance benefits. The Department of Health and Human Services reported that about 267,000 child-only TANF families had a parent or adult caretaker

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<sup>68</sup>See 42 U.S.C. § 1396a(a)(10)(A)(i)(II). States administer the Medicaid program, yet SSI recipients' eligibility for Medicaid is sometimes determined by SSA. According to SSA's Program Operations Manual System, as of May 2016, 33 states and the District of Columbia have agreements with SSA to determine SSI recipients' eligibility for Medicaid. In these states, the SSI application is also the Medicaid application. In the 17 additional states, individuals determined to be eligible for SSI need to separately apply for Medicaid through their state's Medicaid application. Seven of those states use SSI eligibility criteria for Medicaid, and the remaining 10 states use at least one eligibility criterion more restrictive than SSI to determine whether an SSI recipient is eligible for the program. SSA, *Program Operations Manual System (SI 01715.010: Medicaid and the Supplemental Security Income (SSI) Program)*.

<sup>69</sup>Gerald F. Riley and Kalman Rupp. *Longitudinal Patterns of Medicaid and Medicare Coverage Among Disability Cash Benefit Awardees*. Social Security Bulletin, Vol. 72, No. 3, 2012.

<sup>70</sup>U.S. Department of Health and Human Services, *Welfare Indicators and Risk Factors: Fourteenth Report to Congress*. Washington, D.C., 2015.

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who received SSI in fiscal year 2013.<sup>71</sup> In contrast with Medicaid, TANF benefits are generally adjusted based on a family's income level, and for child-only TANF cases, the income and assets of the parent or adult caretaker is factored in when determining the child's TANF benefit.<sup>72</sup> Therefore, TANF cash assistance benefits received by family members living in a household with multiple SSI recipients may increase if a family member's SSI benefit was reduced. However, given that federal funding for TANF is provided through a block grant to states, the amount of federal spending on TANF is not adjusted for changes in cash assistance benefits provided to eligible families.<sup>73</sup>

In comparison with Medicaid and TANF, SNAP is more likely to experience an increase in program spending if a reduction in the maximum SSI benefit rate is established for additional multiple recipient households, based on our review of relevant program laws, regulations, other reports, and recipient data. Similar to Medicaid, SSI recipients can be automatically eligible for SNAP.<sup>74</sup> According to a report by USDA, 82 percent of individuals in households with SSI recipients received SNAP benefits in fiscal year 2013.<sup>75</sup> Further, according to SNAP administrative data, about 4.5 million households receiving SNAP benefits included at

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<sup>71</sup>Child-only TANF cases are those in which the adults in the family are excluded from the assistance unit and are generally not considered when calculating the cash assistance benefit amount. GAO. *Temporary Assistance For Needy Families: Potential Options to Improve Performance and Oversight*. GAO-13-431 (Washington, D.C.: May 15, 2013).

<sup>72</sup>Erika Huber , Elissa Cohen, Amanda Briggs, and David Kassabian, *Welfare Rules Databook: State TANF Policies as of July 2014 (OPRE Report 2015-81)*. Office of Planning, Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services. Washington, D.C. 2015.

<sup>73</sup>As a fixed federal funding stream, the federal TANF block grant amount does not automatically adjust as caseloads or needs change, and the level of the federal grant has not been adjusted for inflation since the program's creation in 1996. GAO-13-431.

<sup>74</sup>See 7 U.S.C. § 2014(a). SSI recipients are automatically eligible for the Supplemental Nutrition Program (SNAP) if they live alone, or in households in which all members receive SSI, with the exception of California, which converts the value of SNAP benefits to cash payments that are included in the state supplementary SSI payment.

<sup>75</sup>Esa Eslami. *Trends in Supplemental Nutrition Assistance Program Participation Rates: Fiscal Year 2010 to Fiscal Year 2013*. U. S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support. August 2015.

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least one member who also received SSI benefits in fiscal year 2013.<sup>76</sup> For the group of SSI recipients who do not receive SNAP benefits, a reduction in SSI benefits may cause them to apply for these benefits. In addition, because SNAP benefit amounts are adjusted based on household income, a reduction in SSI benefits would likely increase a household's SNAP benefit, unless the SSI recipient's household already receives the maximum SNAP benefit amount. According to SNAP administrative data, the average monthly SNAP benefit received by households with SSI as a countable income source was \$205 in fiscal year 2013.<sup>77</sup> Further, these data show that 15.4 percent of households with disabled nonelderly individuals received the maximum SNAP benefit that year, compared to 40.7 percent of all SNAP households.<sup>78</sup> Although a reduced maximum SSI benefit rate for additional multiple SSI recipient households may therefore result in increased federal spending on SNAP, federal spending may decrease overall. Specifically, due to the way SNAP benefits are structured, each lost dollar in SSI benefits would represent less than one additional dollar gained in SNAP benefits.

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### SSA Has Limited Ability to Electronically Manage Claims for Multiple Recipient Households

SSA's claims management system, which is comprised of MSSICS and the SSR, is not able to automatically update the claim records for recipients living in multiple recipient households.<sup>79</sup> SSA officials told us the claims management system was designed to manage the claims of, and pay benefits to, individual recipients. When SSA conducts periodic

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<sup>76</sup>U.S. Department of Agriculture, Food and Nutrition Service. *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2013*, Report No. SNAP-14-CHAR. December 2014.

<sup>77</sup>U.S. Department of Agriculture, Food and Nutrition Service. *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2013*, Report No. SNAP-14-CHAR. December 2014.

<sup>78</sup>Disabled nonelderly households may include SSI recipients and others. For example, a disabled nonelderly individual can be a person 59 years or younger who receives SSI or certain other disability or supplemental benefits. 7 U.S.C. § 2012(j).

<sup>79</sup>The SSR is used to calculate benefits based on information retrieved from MSSICS. MSSICS, an online data collection database, collects recipient information and stores it like a paper file, so whenever an update needs to occur, SSA staff can open the individual's file and make updates. MSSICS houses data such as whether the individual lives alone or with others, owns a house, has certain kinds of expenses, and what, if any, financial support the individual receives from others.

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redeterminations of SSI recipient claims,<sup>80</sup> or SSI recipients inform SSA of changes in their income or living arrangements, field office staff said they update recipients' claims to ensure the correct benefits are paid. However, SSA headquarters and field office staff told us the system does not have the ability to automatically connect and adjust the claim records of individuals living in multiple recipient households. Although changes to one of the SSI recipient's income or living arrangements in a multiple recipient household may affect another recipient's claim in that household, SSA headquarters officials stated that staff have to go into each record separately to update each recipient's benefits. For example, if a mother lives with two of her children who are both SSI recipients, and the mother reports a change in her earned income, SSA's system does not automatically adjust both children's benefit amounts to account for the mother's change in income. Rather, while the system will add the new income information into all relevant claims records, staff need to go into each record separately to process the change. Further, if SSA field office staff do not go into a claim record to process such a change, the system does not alert them to do so. Without the ability to automatically connect and adjust the claim records for individuals living in multiple recipient households whose benefits are inter-related, SSA is at increased risk for improper payments because staff may not adjust benefits for all recipients in a multiple recipient household after a relevant change.<sup>81</sup>

Furthermore, SSA staff reported that processing claims for SSI recipients who marry another recipient or separate from another recipient are not possible in the claims management system. Field office staff must process these claims manually, outside of the claims management system, according to SSA headquarters officials and staff from 3 of the 5 field offices with whom we spoke.<sup>82</sup> For these claims, they said field office

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<sup>80</sup>SSA conducts redeterminations for most beneficiaries annually, or when recipients report a change that affects their eligibility or amount of benefit entitlement.

<sup>81</sup>According to the SSA's Office of Budget, Finance, Quality, and Management Office of Quality Review, *Fiscal Year 2014 Title XVI Payment Accuracy Report* (June, 2015) from fiscal year 2010-2014, wage issues have been among the most frequent causes of improper payments, in addition to financial accounts, ISM, and living arrangements. However, the extent to which improper payments occurred in multiple recipient households is not known.

<sup>82</sup>Of the remaining two field offices, staff from one of the field offices we spoke with said processing married claims required administrative work that was error prone. The topic was not addressed in our interviews with the fifth field office.

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staff must manually complete forms to gather recipient information, calculate benefits outside the claims management system, and then enter the information into the system. Although SSA officials stated SSA provides training on how to use the forms, staff from 3 of the 5 field offices with whom we spoke said they rely on more seasoned field office employees to demonstrate how to properly complete these forms.<sup>83</sup> Further, staff from 3 of the 5 field offices we spoke with told us that manually processing these married and separating recipient household claims are a common part of their daily work.<sup>84</sup> Although an SSA official told us that improper payments made in married couple claims in fiscal year 2014 were attributed to recipient errors,<sup>85</sup> staff from 3 of the 5 SSA field offices with whom we spoke said processing claims outside of the claims management system is time consuming and error prone.<sup>86</sup> This issue may be exacerbated in the near term due to the Supreme Court

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<sup>83</sup>This topic was not addressed in our interviews with the other two field offices.

<sup>84</sup>This topic was not addressed in our interviews with the other two field offices.

<sup>85</sup>Improper payments are generally payments derived or reimbursed from federal funds or resources that should not have been made or that were made in an incorrect amount under statutory, contractual, administrative, or other legally applicable requirements. See section 2 of the Improper Payments Information Act of 2002, as amended, codified at 31 U.S.C. § 3321 note. According to an SSA official, recipients not reporting their marital status or changes to their couples claims accounted for \$64 million in overpayments in fiscal year 2014. Although the SSA official stated that all overpayments related to marital status in that year were due to recipient error, the agency did not provide support for how this designation was determined. Therefore, it is unclear to what extent the manual processing done to adjust claims for SSI recipients marrying or separating from one another contributed to these improper payments. SSA's Office of Budget, Finance, Quality, and Management Office of Quality Review, *Fiscal Year 2014 Title XVI Payment Accuracy Report* (June, 2015).

<sup>86</sup>Staff from another field office said processing married claims outside of the claims management system was error prone, but they did not identify if processing claims outside of the claims management systems resulted in claims taking a long time to process. Staff from the fifth field office did not address this topic.

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ruling recognizing the right of same-sex couples to marry, a concern specifically noted during one of our interviews with field office officials.<sup>87</sup>

SSA has no plans to update its claims management system to address issues with processing claims for multiple recipient households, including marrying and separating recipients, although the agency has broadly committed to improving other areas of its technology infrastructure. SSA officials told us that they have not conducted any specific assessments of the effects manual payment processing for multiple recipient household claims has on claim processing errors or improper payments as part of their payment accuracy reporting. SSA officials explained there is no program requirement to have the claims management system connect the records of individuals living in multiple recipient households, and they do not plan to make changes to do so. Yet, SSA has previously stated its commitment to investing in the capacity and modern technologies needed to update its aging and strained IT infrastructure.<sup>88</sup> Furthermore, in its 2017 budget request, SSA stated its data systems are no longer the best solution to administer the agency's programs, and added that it plans to undertake a larger, multiyear reform effort. According to our *Organizational Transformation: A Framework for Assessing and Improving Enterprise Architecture*, improving an agency's enterprise architecture is an essential means to having operations and technology environments maximize institutional mission performance and outcomes.<sup>89</sup> Moreover, *Standards for Internal Control in the Federal Government* states that agencies should identify and address risks to achieving their objectives, including significant changes to both external

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<sup>87</sup>See *Obergefell v. Hodges*, 135 S. Ct. 2584 (2015). According to SSA headquarters officials, the agency plans to update their claims management systems to accommodate married couple claims with recipients of the same gender in fiscal year 2016. Specifically, the change will allow the claims management system to record two recipients of the same gender to be designated as "married" for the purposes of creating the joint claim record and calculating benefits. This change will not improve the manual process currently used to process claims for SSI recipients who marry. There may be decreased SSI benefit costs associated with these claims as same sex couples receive the lower married couple benefit rate.

<sup>88</sup>GAO, *Social Security Administration: Improved Planning and Performance Measures Are Needed to Help Ensure Successful Technology Modernization*, [GAO-12-495](#) (Washington, D.C.: April 26, 2012).

<sup>89</sup>GAO, *Organizational Transformation: A Framework for Assessing and Improving Enterprise Architecture*, [GAO-10-846G](#) (Washington, D.C., November 1999).

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and internal conditions, as well as design their information systems to support the completeness, accuracy, and validity of information needed to achieve objectives.<sup>90</sup> The increased opportunities for improper payments resulting from the claims management system's limitations in updating and processing benefit claims for those living in multiple SSI recipient households is a risk to SSA's overall goal of strengthening the integrity of SSA's programs. According to staff at 2 of the 5 field offices with whom we spoke, fully automating the payment process for all claims and electronically connecting the records for multiple recipient households would make processing these claims more efficient and lower the number of improper payments by reducing errors in claims processing.<sup>91</sup> However, SSA has not assessed the risks these systems limitations pose, despite its plans to make changes to its data systems. Absent such an assessment and without upgrades to the claims management system, SSA is missing an opportunity to improve its day-to-day work processes. Further, the agency will likely continue to experience related claim processing errors and improper payments, both under current program policies, as well as in the event related policy changes are implemented in the future.

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## Conclusions

Although SSI provides cash assistance benefits to individuals, it is not surprising that some SSI recipients live together due to family relationships or economic and social factors. Any household with more than one member may potentially experience economies of scale, and when the SSI program was created, it included a lower maximum benefit rate for certain married couple recipients. However, despite the fact that the majority of households with multiple SSI recipients report including members of only one family, few report that they include married couple recipients. This raises questions for some about benefit equity and disincentives to marriage, as well as the ability of program administrators to effectively determine a recipient's marital status. Although the potential effects of various benefit restructuring options have not been fully studied, our finding that households with multiple SSI recipients receive almost 30

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<sup>90</sup>GAO, *Standards for Internal Control in the Federal Government*. [GAO/AIMD-00-21.3.1](#). (Washington, D.C.: November 1999).

<sup>91</sup>This topic was not addressed in our interviews with the other three field offices we spoke with.

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percent of all SSI benefits suggests that changing the benefit structure for all or some of these households may have a significant effect on benefit costs. Further, regardless of whether a change to benefits for households with multiple recipients is made, there are limitations in SSA's information systems with managing claims for SSI recipients who live with other recipients, which puts the agency at risk. However, absent a risk assessment, SSA lacks information on the impact current systems limitations may have on improper payments. The recent Court ruling recognizing the right of same-sex couples to marry also likely increases opportunities for improper payments to SSI recipients, because of the expected increase in the number of claims SSA staff must process manually due to the system's constraints in converting claims for individual recipients to married couple recipients. Despite reported plans to upgrade SSA's aging technology systems, SSA currently does not have plans to address issues related to processing claims for SSI recipients who live with other recipients, leaving the program at risk for improper payments. Should Congress choose to revise benefit structure policy for households with multiple SSI recipients, SSA will be poorly positioned to implement and administer those changes in the future.

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## Recommendation for Executive Action

To ensure the agency has sufficient information about risks to SSI program integrity when making decisions about efforts to address them, we recommend that the Commissioner of the Social Security Administration conduct a risk assessment of the current manual process for connecting and adjusting claim records of SSI recipients who live in households with other SSI recipients, and, as appropriate, take steps to make cost-effective improvements to SSA's claims management system to address identified risks.

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## Agency Comments and Our Evaluation

We provided a draft of this report to SSA for review and comment. In its written comments, reproduced in appendix III, SSA disagreed with our recommendation stating that current SSI program rules do not support connecting records of unrelated individuals living in multiple recipient households. SSA also noted that it does not have evidence from its fiscal year 2014 payment accuracy reviews that manual processing of married couple multiple recipient household claims led to payment errors. As such, the agency stated that it could not commit resources to address our recommendation at this time, but noted if a legislative proposal is put forth that affects unrelated multiple SSI recipient households, SSA will assess program policy and systems risks as part of its evaluation and planning. However, we continue to believe that the manual processing currently

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used to connect and adjust claim records of SSI recipients who live in households with other SSI recipients leaves the agency at risk. SSA has acknowledged that it has not assessed the extent to which manual processing leads to payment errors, and the data they provided us on fiscal year 2014 improper payments to married couple recipients does not address the full scope of the issues we identified. Specifically, field office staff reported several instances in which manual processing is used to connect and adjust claims records for multiple recipient households due to system limitations, and indicated that these manual adjustments increase the likelihood of erroneous payments. These manually processed claims are for households with multiple related recipients whose SSI benefits are currently inter-related under program rules, such as multiple child recipients who are siblings or individual recipients who marry another recipient. Without an assessment of the risks associated with the manual processing of these claims, SSA is unable to determine if additional adjustments to its system would be a cost-effective use of its resources. SSA officials also provided technical comments, which we incorporated into the final report, as appropriate.

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As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the Commissioner of the Social Security Administration, appropriate congressional committees, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report please contact me at (202) 512-7215 or [bertonid@gao.gov](mailto:bertonid@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Daniel Bertoni,  
Director, Education, Workforce, and Income Security

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# Appendix I: Scope and Methodology

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To better understand multiple Supplemental Security Income (SSI) recipient households and the potential effects of implementing a change in the amount of benefits received by these households on program administration and other factors, we employed several methods, including:

- analysis of matched data from Social Security Administration (SSA) Supplemental Security Record (SSR) and U.S. Census Bureau (Bureau) Survey of Income and Program Participation (SIPP)
- review of relevant program laws, regulations, and other reports for other federal programs for low-income individuals and families
- interviews with SSA staff.

We conducted this performance audit from March 2015 to August 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Analysis Using Matched SSR and SIPP Data

To respond to our questions, we obtained and analyzed matched data from the Bureau's SIPP and SSA's SSR on the number and characteristics of SSI recipients living with other SSI recipients, and the amounts of benefits received by these recipients. We determined SIPP was the best choice for matching with the SSR after interviewing experts who had worked with this and other similar data sets. According to these experts, SIPP was the best choice for our work because it is updated on a monthly basis, so it is well matched to the SSR data on the SSI program.

### Analytical Goals and Target Population

To describe the living arrangements of SSI recipients, we needed data on both the population of SSI recipients and the characteristics of their households and families. SSA collects detailed data on recipients for the purpose of administering the SSI program. These data primarily included variables related to eligibility, benefit amounts, and beneficiary activities relevant to the program, such as earned and unearned income. SSA does not collect data on recipients' living arrangements. This makes administrative data incomplete for the purpose of describing household and family composition among recipients.

The Bureau's program of matching administrative and survey data provided these data to supplement SSA's administrative records. The Bureau matches SSA's administrative data to SIPP public use files, using a complex algorithm that we describe in more detail below. The matched SIPP files provide detailed information on other people living in SSI recipients' households, including related family members. Although SIPP data on SSI benefit receipt and amount are subject to measurement error, the survey's data on households, families, and other social demographic variables were more detailed and reliable than SSA's administrative sources. In this sense, the matched data benefit from each data source's strength, and produced more reliable data for our purposes.

The target population for our analysis included SSI recipients who do not live in large group housing environments, such as boarding houses or dormitories. The SIPP classifies these environments as "group quarters." As a result, we analyzed a subpopulation of the matched SIPP respondents who received SSI benefits, according to the SSR, and who did not live in group quarters, according to the SIPP. We analyzed this subpopulation using methods for domain analysis that set analytical weights to zero for sample units that were out of scope.

Data

We analyzed two specific series of data from the Bureau and SSA: public-use "core" files from the 2008 SIPP panel and SSR data extracted at equivalent time periods.

2008 SIPP Core Data

The 2008 SIPP is a longitudinal survey of civilian, non-institutionalized residents of the United States, with final-stage sampling of housing units.<sup>1</sup> In the first wave, the survey attempted to interview people living in an initial sample of 52,031 eligible housing units.<sup>2</sup> In subsequent waves, the survey attempted to re-interview respondents from the first wave, along with all other people living with them at later waves. The population covered by the SIPP is generally the same as the population eligible for SSI. However, the SIPP may exclude certain SSI recipients who live in institutions such as long-term medical facilities. We believe this coverage

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<sup>1</sup>Westat, *Survey of Income and Program Participation Users' Guide: Supplement to the Technical Documentation*, 3d ed. (Washington, DC: U.S. Census Bureau, 2001).

<sup>2</sup>U.S. Census Bureau, *Source and Accuracy Statement for the 2008 Panel 1 to Wave 16 (Core) Public Use Files of the Survey of Income and Program Participation (SIPP)* (Washington, DC: U.S. Census Bureau, 2015).

error to be minimal and therefore, we did not make weight adjustments for this population.

The survey interviewed respondents roughly once every four months. Respondents provided data about the previous four month “reference” period, with many variables measured each month within the period. The Bureau administered the survey using a system of interview rotation groups, such that in any month, one-quarter of the eligible sample gave responses. For any month of measurement, data from four rotation groups, interviewed on different dates, make up a complete sample.

We analyzed data for five unique time periods: May of each year from 2009 through 2013. We chose May as the reference month to align with the month of the most recent SSR extract in May 2013 (see below). In each time period, we built a complete sample by selecting rotation groups and waves that corresponded to the reference month of interest. For example, a complete sample for the reference month of May 2013 included data from rotation groups 1 from wave 16 and groups 2-4 from wave 15. Selecting complete sets of rotation groups avoided the need to adjust weights and maximized the available data.<sup>3</sup> We applied monthly weights to make generalizable estimates for the SIPP target population for each of the five distinct reference months. We did not include longitudinal data on whether respondents gave responses or were in-scope for all time periods, and instead made five cross-sectional estimates.

## SSR Extracts

The SSR contains various fields that describe SSI recipients’ participation in the program. For our purposes, the primary fields of interest include benefit receipt, benefit amount, marital status, earned income, and unearned income.

The Bureau maintains a cumulative file of the SSR extracts that it has received since its record linkage program began. One record in the file exists for each SIPP respondent who ever matched an SSR extract. Fields include a subset of SSR fields in SSA’s version of the file, some of which are measured at multiple times and some only for the date of the

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<sup>3</sup>U.S. Census Bureau, *Source and Accuracy*, 10.

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file. We analyzed a May 2013 vintage of this file, which contains monthly historical data for all variables of interest except marital status.

## Record Linkage

The Bureau has developed a general method of linking data with personally-identifying variables to their surveys, known as the Person Identification Verification System (PVS).<sup>4</sup> PVS seeks to produce a unique identification number for a given person, called a Protected Identification Key (PIK), across all data ever used as input and reference files that the Bureau maintains from federal sources, such as SSA.

According to Bureau documentation, PVS uses blocking and matching methods to estimate the probability that a given input record matches verified reference files and can be assigned a PIK. Blocking variables, such as the first three digits of a Zip code or first or last names, reduce the space of potential matches to make computation feasible. Matching variables, such as Social Security number, name, or date of birth, serve as input for calculating multivariate weights that describe the degree of record similarity across the matching variables. PVS assigns a PIK when the value of the match weight exceeds a threshold of similarity, assumed as an input parameter. The system contains multiple modules with different blocking and matching variables and similarity parameters. Records that are not assigned PIKs in one module move on to later modules.

The Bureau research shows that PVS reliably assigns PIKs to federal data sources, such as the SSR. Since the Bureau has access to detailed data files on Social Security transactions, the agency can verify the accuracy of PVS using reference files. A 2014 validation found that observed false match rates varied from 0.005 percent to 1.174 percent for Medicare data extracted in 2011, with similar results found for the same

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<sup>4</sup>Deborah Wagner and Mary Layne, "The Person Validation System (PVS): Applying the Center for Administrative Records Research and Applications' (CARRA) Record Linkage Software" (working paper, CARRA Working Paper 2014-01, U.S. Census Bureau, Washington, DC: 2014). Mary Layne, Deborah Wagner, and Cynthia Rothhaas, "Estimating Record Linkage False Match Rate for the Person Identification Validation System" (working paper, CARRA Working Paper 2014-02, U.S. Census Bureau, Washington, DC: 2014).

file extracted in 2012.<sup>5</sup> These low levels of misclassification are acceptable for our purposes. The matched data have some additional error from the record linkage process, but have substantially lower measurement error of key variables, such as SSI receipt.

Although the Bureau research has found that the PIK is accurate, once it can be assigned, PVS cannot always assign PIKs for all records in a particular application. PIK assignment rates for 2008 SIPP panel waves range from 89.4 percent to 90.6 percent. This adds commensurate amounts of missing data to our analysis, which requires data from both the SIPP and SSR.

The Bureau research has found that survey records without PIKs assignment are unlikely to be missing at random. This suggests that analysis of survey and administrative data matched using the PIK should adjust for potential bias from the PIK assignment process. We discuss our method of adjustment below.

We matched the 2008 SIPP public-use core files to the Bureau version of the SSR using the PIK and unique identifying variables in each file. We then joined the two files using the PIK. This approach is not documented publically, but follows guidance we received from the Bureau staff.

## Missing Data, Imputation, and Weighting

Since the SIPP is a longitudinal survey, missing data can accumulate across waves as members of the original sample stop participating. According to Bureau documentation, sample loss rates range from 19.4 percent in wave 1 to 53.1 percent in wave 16.<sup>6</sup>

Our analysis used data from multiple waves for each reference month of interest, including later waves that have moderate levels of unit nonresponse. To adjust for potential bias, we used the weighting cell adjustments that are integrated into the weights provided by the Bureau. As a further check, we compared select estimates to known values from SSA publications. Specifically, we compared, by age group, estimates of total beneficiaries and total and mean SSI benefits. If our estimates' confidence intervals did not span the control values, we applied an

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<sup>5</sup>Layne, Wager, and Rothhaas, 12-13.

<sup>6</sup>U.S. Census Bureau, *Source and Accuracy*, 6.

additional post-stratification adjustment to align the results. Because many of our key estimates involve total beneficiaries and benefit amounts by age group, post-stratification adjusted for unit nonresponse bias for our specific population, supplementing the general Bureau adjustments.

When the Bureau cannot assign a PIK to SIPP respondents, as discussed above, they have a zero probability of matching the SSR and contribute additional unit missing data. Rates of PIK assignment in our matched data ranged from 89.4 percent to 90.6 percent, depending on the SIPP wave, which implies that the matching process adds a small amount of missing data. However, Bureau research suggests that younger, non-white, and lower household income respondents, among others, are more likely to lack PIKs. As a result, we estimated the relationship between variables relevant to our analysis, such as age, income, and disability status, and the probability of a missing PIK, in order to mitigate potential bias and scale up estimated totals back to the controls used in the Bureau post-stratification adjustment.<sup>7</sup> The latter goal is particularly important, because our analysis estimated many population totals.

We used nonparametric weighting class methods to adjust for missing data due to record linkage.<sup>8</sup> First, we cross-classified the adjustment variables to obtain a categorical variable identifying joint group membership, collapsing groups containing less than 0.1 percent of the sample into a residual group to avoid excessive weight variance and instability. Letting  $X_{ij}$  denote the joint adjustment variable for respondent  $i$ , having levels  $j = \{1, 2, \dots, J\}$ , and letting  $Y_i = I(\text{Missing PIK})$ , we estimated the probability of a missing PIK conditional on the adjustment variable with

$$\pi_{ij} = \Pr(Y_i | X_{ij}) = E(Y_i | X_{ij})$$

<sup>7</sup>Westat, *SIPP Users' Guide*, 8-5.

<sup>8</sup>Sharon Lohr, *Sampling: Design and Analysis*, 266-268. Roderick J. A. Little, and Donald B. Rubin, *Statistical Analysis with Missing Data*, 2ed, 44-49. This approach is similar to the one used by Census researchers, and includes many of the same adjustment variables. However, we estimate the conditional probability of a PIK assignment using nonparametric adjustment classes rather than a generalized linear regression model.

$$\hat{\pi}_{ij} = \frac{1}{\sum_i w_i \cdot I(x_{ij} = j)} \sum_i w_i \cdot y_i \cdot I(x_{ij} = j)$$

where  $w_i$  is the final person weight provided by the Bureau . We calculated the adjusted weight as

$$w_i^* = w_i \frac{1}{\hat{\pi}_{ij}}$$

Following the Bureau methods, we used the adjusted weight for the household reference person as the adjusted household weight.<sup>9</sup>

Rates of item nonresponse and Bureau imputation are extremely low for the SIPP variables of interest. Item imputation rates generally do not exceed 5 percent for the SIPP variables we analyzed, which mostly include household, family, and age variables. Of the small fraction of data that are imputed, most are imputed responses from prior waves or logically implied by other, observed variables. The remaining imputed values are statistical estimates. Given the low rates of item missing data and the high rates of non-statistical imputation, we used the imputed data that the Bureau provides and assume that statistical imputation error is ignorably small.

## Estimation

The SIPP is a multi-stage, stratified, cluster sample of households. Since the Bureau does not provide sample design variables to preserve respondent privacy, we used the supplied bootstrap replicate weights to calculate balanced repeated replication estimates of sampling variance. We analyzed small subpopulations, so we applied a Fay adjustment to ensure stable estimates across groups, consistent with Bureau guidelines. All estimates of interest are linear functions of weighted totals (e.g., mean and total recipients, benefits, or income), so standard estimators are appropriate.

<sup>9</sup>Westat, *SIPP Users' Guide*, 8-10.

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## Other Federal Programs for Low-Income Individuals and Families

To better understand the potential effects of changing an SSI recipient's benefits on other federal benefit programs, we reviewed relevant program rules and relevant data for three federal programs—Medicaid, Temporary Assistance for Needy Families (TANF), and the Supplemental Nutrition Assistance Program (SNAP). We selected these programs because they each serve large numbers of low-income individuals, and households with SSI recipients may be eligible to receive these benefits as well. To understand the extent SSI recipients receive benefits from each of these programs, we reviewed relevant studies on Medicaid and SSI,<sup>10</sup> federally available TANF caseload data from the U.S. Department of Health and Human Services,<sup>11</sup> and the U.S. Department of Agriculture, Food and Nutrition Service's report on the characteristics of SNAP Households.<sup>12</sup>

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## Interviews with SSA Staff

To gather information on the characteristics of multiple recipient households, SSA's administration of SSI claims for individual recipients and multiple recipient households, and how changing the amount of benefits received by multiple recipient households may potentially affect SSA, we conducted interviews with staff from SSA headquarters and select field offices. Specifically, we interviewed staff from SSA's Office of Research, Demonstration, and Employment Support; Office of Systems; and the SSI Simplification Workgroup. In addition, we conducted interviews with field office managers and SSI claims representatives from five SSA field offices located in Los Angeles, California; Louisville, Kentucky; Baltimore, Maryland; Brooklyn, New York; and Houston, Texas. We selected these field offices to account for geographic dispersion, with at least one office representing the east coast, west coast, mid-west, and

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<sup>10</sup>Studies reviewed included, Gerald F. Riley, and Kalman Rupp, *Longitudinal Patterns of Medicaid and Medicare Coverage Among Disability Cash Benefit Awardees*. Social Security Bulletin, Vol. 72, No. 3, 2012.

<sup>11</sup>U.S. Department of Health and Human Services, Administration for Children and Families, Office of Family Assistance, *Temporary Assistance for Needy Families Program (TANF) Eleventh Report to Congress*. April 7, 2016, accessed May 5, 2016: [http://www.acf.hhs.gov/sites/default/files/ofa/eleventh\\_report\\_to\\_congress.pdf](http://www.acf.hhs.gov/sites/default/files/ofa/eleventh_report_to_congress.pdf).

<sup>12</sup>U.S. Department of Agriculture, Food and Nutrition Service. *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2013*, Report No. SNAP-14-CHAR. December 2014.

southern United States.<sup>13</sup> We also selected these field offices based on their location in states and cities with high concentrations of SSI recipients, to better ensure the likelihood that the field offices we selected were managing claims of multiple SSI recipient households. Of the five states we selected, we included one state where at least 40 percent of its population lived in rural areas.<sup>14</sup> The views of staff from these field offices are not generalizable to all field offices nationwide. To gain additional perspectives from SSA field office staff, we interviewed 10 additional SSA field office managers affiliated with the National Council of Social Security Management Associations.<sup>15</sup>

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<sup>13</sup>SSA's field organization includes 10 regional offices, 6 processing centers, and approximately 1,230 field offices. There are 2 additional processing centers in central office.

<sup>14</sup> U.S. Census Bureau. *2010 Census Urban and Rural Classification and Urban Area Criteria*.

<sup>15</sup>According to The National Council of Social Security Management Associations' website, its mission is to "improve management and program administration in SSA by assuring the knowledge and experience of front-line management are included in all phases of agency planning and decision making." NCSSMA advocates "for an SSA that remains customer focused and provides excellent public service while embracing technological advances and innovation."

# Appendix II: Data Estimates Related to Multiple Supplemental Security Income (SSI) Households

**Table 3: Estimated Number and Proportion of Households Receiving Supplemental Security Income Benefits, by Household Type, May 2013**

Household type	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
All households	7,222,642	6,838,043 – 7,607,241	100.0	—
One recipient households	6,138,009	5,802,594 – 6,473,423	85.0	82.7 – 87.0
Multiple recipient households – all	1,084,633	909,919 – 1,259,347	15.0	13.0 – 17.3
Married recipient households	89,777	43,317 – 136,237	1.2	0.7 – 2.1
Nonmarried recipient households	994,856	823,265 – 1,166,477	13.8	11.8 – 16.1

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Table 4: Estimated Number and Proportion of Multiple Supplemental Security Income Recipient Households, by Number of Families, May 2013**

Number of families in multiple recipient households	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
All households	1,084,633	909,919 – 1,259,347	100.0	—
Households with one family	940,828	779,287 – 1,102,369	86.7	81.6 – 90.9
Households with two families	106,262	68,335 – 144,188	9.8	6.2 – 14.5
Households with three or more families	37,544	2,152 – 72,936	3.5	1.0 – 8.3

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Table 5: Estimated Number and Proportion of Multiple Supplemental Security Income Recipient Households, by Number of Supplemental Security Income Recipients, May 2013**

Number of recipients in multiple recipient households	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
All households	1,084,633	909,919 – 1,259,347	100.0	—
Households with one to two recipients	953,221	793,014 – 1,113,428	87.9	82.1 – 92.3
Households with three or more recipients	131,412	74,051 – 188,774	12.1	7.7 – 17.9

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Appendix II: Data Estimates Related to Multiple Supplemental Security Income (SSI) Households**

**Table 6: Estimated Number and Proportion of Multiple Supplemental Security Income Recipient Households, by Number of Non-Recipients, May 2013**

Number of non-recipients in multiple recipient households	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
All households	1,084,633	909,919 – 1,259,347	100.0	—
Households with zero non-recipients	395,502	311,332 – 479,672	36.5	30.0 – 43.4
Households with one to two non-recipients	338,500	236,212 – 440,787	31.2	24.6 – 38.7
Households with three or more non-recipients	350,632	263,362 – 437,902	32.3	26.6 – 38.7
Households with one or more non-recipients	689,131	542,767 – 835,496	63.5	56.6 – 70.0

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Table 7: Estimated Number and Proportion of Multiple Supplemental Security Income Recipient Households, by Age of Recipients, May 2013**

Recipient age composition for multiple recipient households	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
All households	1,084,633	909,919 – 1,259,347	100.0	—
Households with all child recipients (17 and younger)	112,046	57,390 – 166,702	10.3	6.1 – 16.1
Households with child and working-age adult recipients	207,715	126,728 – 288,703	19.2	13.4 – 26.6
Households with all working-age adult recipients (18-64)	343,559	256,479 – 430,639	31.7	25.2 – 38.9
Households with working-age adult and elderly recipients	143,988	90,991 – 196,985	13.3	9.4 – 18.4
Households with all elderly recipients (65 and older)	265,831	183,245 – 348,417	24.5	18.5 – 31.7

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Table 8: Estimated Number of Child Supplemental Security Income Recipients in Multiple Recipient Households, May 2013**

Number of child recipients in multiple recipient households	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
All households	1,084,633	909,919 – 1,259,347	100.0	—
Households with zero child recipients	753,377	615,937 – 890,818	69.5	61.5 – 76.4
Households with one child recipient	189,881	116,005 – 263,757	17.5	12.3 – 24.4
Households with two child recipients	111,022	61,267 – 160,777	10.2	6.3 – 15.5
Households with three or more child recipients	30,353	1,496 – 59,209	2.8	0.8 – 6.7

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Appendix II: Data Estimates Related to Multiple Supplemental Security Income (SSI) Households**

**Table 9: Estimated Number and Proportion of Supplemental Security Income Recipients in Multiple Recipient Households, by Gender, May 2013**

Gender of recipients in multiple recipient households	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
All recipients	2,392,762	1,982,245 – 2,803,279	100.0	—
Male recipients	1,293,130	1,025,859 – 1,560,400	54.0	49.7 – 58.3
Female recipients	1,099,632	911,228 – 1,288,036	46.0	41.7 – 50.3

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Table 10: Estimated Earned and Unearned Income Received by One and Multiple Supplemental Security Income Recipients Households, May 2013**

Household type	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval	Estimated average dollar amount	95 percent confidence interval
All one recipient households	6,138,009	5,802,594 – 6,473,423	100.0	—	—	—
One recipient households with earned income	123,174	62,611 – 183,737	2.0	1.1 – 3.3	\$188.60	\$85.80 - \$291.40
One recipient households with unearned income	3,221,866	2,995,551 – 3,448,181	52.5	49.8 – 55.2	\$456.50	\$439.90 - \$473.20
All multiple recipient households	1,084,633	909,919 – 1,259,347	100.0	—	—	—
Multiple recipient households with earned income	34,700	15,005 – 54,396	3.2	1.3 – 6.4	\$147.50	\$69.10 - \$226.00
Multiple recipient households with unearned income	652,528	516,439 – 788,617	60.2	52.5 – 67.3	\$622.10	\$560.20 - \$683.90

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

Appendix II: Data Estimates Related to Multiple Supplemental Security Income (SSI) Households

**Table 11: Estimated Proportion of Households with Multiple Supplemental Security Income Recipients with Earned Income, May 2009 to May 2013**

Year	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
May 2009	47,386	19,114 – 75,658	5.1	2.5 – 9.2
May 2010	51,081	22,282 – 79,880	5.5	2.9 – 9.4
May 2011	53,589	28,024 – 79,153	5.5	3.1 – 9.1
May 2012	39,314	10,053 – 68,576	3.7	1.5 – 7.6
May 2013	34,700	15,005 – 54,396	3.2	1.3 – 6.4

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Table 12: Estimated Number and Proportion of Households with Multiple Supplemental Security Income Recipients with Two Families, May 2009 to May 2013**

Year	Estimated population	95 percent confidence interval	Estimated percent	95 percent confidence interval
May 2009	191,706	132,093 – 251,319	20.7	15.6 – 27.0
May 2010	240,635	159,737 – 321,534	25.9	19.5 – 33.6
May 2011	106,123	62,070 – 150,176	11.0	7.1 – 16.0
May 2012	124,959	80,769 – 169,149	11.8	8.0 – 16.7
May 2013	106,262	68,335 – 144,188	9.8	6.2 – 14.5

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Table 13: Estimated Amount and Proportion of Supplemental Security Income Received by Households, by Type, May 2013**

Household Type	Estimated total dollar amount (in millions)	95 percent confidence interval (in millions)	Estimated percent	95 percent confidence interval
All multiple recipient households	\$1,227	\$1,000 - \$1,455	28.6	24.7 – 32.6
One recipient households	\$3,059	\$2,838 - \$3,280	71.4	67.4 – 75.3

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Appendix II: Data Estimates Related to Multiple Supplemental Security Income (SSI) Households**

**Table 14: Estimated Average Amount of Supplemental Security Income Received by Households, by Type, May 2013**

Household type	Estimated total dollar amount (in millions)	95 percent confidence interval (in millions)	Estimated average amount per recipient (in dollars)	95 percent confidence interval (in dollars)	Estimated average amount received by household (in dollars)	95 percent confidence interval (in dollars)
<b>All multiple recipient households</b>	\$1,227	\$1,000 - \$1,455	\$542	\$505 - \$579	\$1,131	\$1,045 - \$1,217
Married recipient households	\$89	\$36 - \$141	\$488	\$392 - \$585	\$983	\$796 - \$1,170
Nonmarried recipient households	\$1,139	\$912 - \$1,365	\$546	\$508 - \$584	\$1,144	\$1,053 - \$1,236
<b>One recipient households</b>	\$3,059	\$2,838 - \$3,280	\$513 <sup>a</sup>	\$488 - \$539	\$507 <sup>a</sup>	\$485 - \$530
<b>All recipient households</b>	\$4,286	\$3,958 - \$4,615	\$521	\$501 - \$542	\$602	\$576 - \$629

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

<sup>a</sup>Because the average estimates are constructed with different weights to account for household and recipient level samples, these two estimates are not the same.

**Table 15: Estimated Amount of Monthly Supplemental Security Income Received by Households, by Type, May 2013**

Household type	Amount of Supplemental Security Income received	Estimated households	95 percent confidence interval	Estimated percent	95 percent confidence interval
<b>Multiple recipient households</b>	\$0-\$499	110,546	67,467 – 153,624	10.2	6.8 – 15.1
	\$500 - \$999	336,505	232,546 – 440,463	31.0	23.7 – 39.4
	\$1,000 or more	637,583	501,330 – 773,835	58.8	50.5 – 66.6
	Total	1,084,633	909,919 – 1,259,347	100.0	—
<b>One recipient households</b>	\$0-\$499	2,707,725	2,511,644 – 2,903,805	44.1	41.7 – 46.6
	\$500 - \$999	3,395,910	3,139,483 – 3,652,337	55.3	52.8 – 57.8
	\$1,000 or more	34,374	16,004 – 52,743	0.6	0.2 – 1.1
	Total	6,138,009	5,802,594 – 6,473,423	100.0	—

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

**Appendix II: Data Estimates Related to Multiple  
Supplemental Security Income (SSI)  
Households**

**Table 16: Estimated Average of Monthly Supplemental Security Income Received Per Recipient by Households, by Type, May 2013**

Household type and recipient age	Estimated average payment (in dollars)	95 percent confidence interval (in dollars)
<b>All households</b>	Children (17 and younger)	\$641
	Working-age adults (18-64)	\$545
	Elderly (65 and older)	\$396
	Total	\$521
<b>Multiple recipient households</b>	Children (17 and younger)	\$656
	Working-age adults (18-64)	\$576
	Elderly (65 and older)	\$392
	Total	\$542
<b>One recipient households</b>	Children (17 and younger)	\$633
	Working-age adults (18-64)	\$535
	Elderly (65 and older)	\$398
	Total	\$513

Source: GAO analysis of matched Social Security Administration and U.S. Census Bureau data. | GAO-16-674

# Appendix III: Comments from the Social Security Administration



**SOCIAL SECURITY**  
Office of the Commissioner

July 21, 2016

Ms. Barbara Bovbjerg  
Director, Education, Workforce,  
and Income Security Issues  
United States Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Bovbjerg:

Thank you for the opportunity to review the draft report, "SUPPLEMENTAL SECURITY INCOME: SSA Provides Benefits to Multiple Recipient Households but Needs System Changes to Improve Claims Management (GAO-16-674)." Please see our attached comments.

If you have any questions, please contact me at (410) 965-0520. Your staff may contact Gary S. Hatcher, Advisor for the Audit Liaison Staff, at (410) 965-0680.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Cristaudo'.

Frank Cristaudo  
Executive Counselor to the Commissioner

Enclosure

SOCIAL SECURITY ADMINISTRATION BALTIMORE MD 21235-0001

**COMMENTS ON THE GOVERNMENT ACCOUNTABILITY OFFICE DRAFT REPORT, "SUPPLEMENTAL SECURITY INCOME: SSA PROVIDES BENEFITS TO MULTIPLE RECIPIENT HOUSEHOLDS BUT NEEDS SYSTEM CHANGES TO IMPROVE CLAIMS MANAGEMENT" (GAO-16-674)**

Thank you for the opportunity to review and comment on the draft report. We are pleased that the analysis did not result in any findings of fraud or overpayments. The Supplemental Security Income (SSI) program is an individual needs based program and was not designed or structured on household circumstances for unrelated individuals. This is unlike other Federal needs based programs such as the Supplemental Nutrition Assistance Program. While Congress created a lower maximum benefit for married couples, it did not create a multiple recipient household maximum for unrelated individuals or other multi-recipient families.

Based on current program rules, we structured our SSI claims management system to support claims for both individuals (adults and children) and couples. We did not structure it to relate records of SSI recipients who live together, but whose eligibility and payments are not interrelated by law. Given the complexities of the program rules, over the years we have made enhancements to our systems to assist staff in managing these claims. Currently, the system merges and stores information, previously stored separately, in one place so it is available to all of the SSI claims associated with that individual. The system also supports separating a couple's record into two individual records when the couple is no longer in an SSI marital relationship and no longer living together. Finally, where there are locally managed actions (e.g., two SSI individuals become a couple), the eligibility and payment calculations are supported by an automated eComputations application. In fiscal years (FY) 2016-2017 we have a planned enhancement in our SSI systems to support the court's rulings (*United States v. Windsor* and *Obergefell v. Hodges*) on same sex marriage.

If there is a legislative change in program rules that affects SSI multi-recipient households, we will adjust program rules, modify our policies, and update our systems within our resource capabilities. Below is our response to the recommendation. We are providing several technical comments under separate cover.

**Recommendation 1**

Conduct a risk assessment of the current manual process for connecting and adjusting claim records of SSI recipients who live in households with other SSI recipients, and, as appropriate, take steps to make cost-effective improvements to SSA's claims management system to address identified risks.

**Response**

We do not agree with this recommendation. As noted in our general comments above, SSI is an individual needs based program. Under very specific circumstances, we consider and make

adjustments to payments to multiple related recipients (spouses and children) living in the same household. The report results affirm that there are several types of multiple recipient households that include a combination of related or unrelated recipients. Current program rules do not support connecting the records of individuals in unrelated multiple recipient households.

Our FY 2014 Title XVI stewardship findings indicate that 100 percent of the erroneous payments that occurred when our system did not reflect a recipient's current and correct marital status were due to the failure of these recipients to report changes in their marital status from what we initially determined. We did not attribute any of these deficiency dollars to incorrect manual processing of these records. Given that the report did not discover any fraud or improper payments, we cannot commit our constrained resources to adopt this recommendation at this time.

If a legislative proposal is put forth that affects unrelated multiple SSI recipient households, we will, as part of our evaluation and planning, assess program policy and systems risks and develop cost estimates on any proposals' impact on our resources.

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# Appendix IV: GAO Contact and Staff Acknowledgements

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## GAO Contact

Daniel Bertoni, Director, (202) 512-7215 or [bertonid@gao.gov](mailto:bertonid@gao.gov)

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## Staff Acknowledgements

In addition to the contact named above, Rachel Frisk (Assistant Director), Kristen Jones and Michelle Loutoo Wilson (Analysts in Charge), William Carpluk, David Forgosh and Jeff Tessin made key contributions to this report. Additional contributors include Carl Barden, Holly Dye, Alexander Galuten, Sheila McCoy, Mimi Nguyen, Monica Savoy, Mark Ward, and Margaret Weber.

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