



UNITED STATES GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

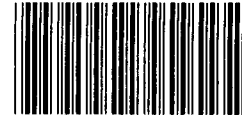
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HUMAN RESOURCES  
DIVISION

[Improvements Needed in the SSI Oral Inquiry Process]

Mr. Stanford G. Ross  
Commissioner, Social Security Administration  
Department of Health, Education,  
and Welfare



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Dear Mr. Ross:

In April 1978, the Social Security Administration (SSA) implemented a proposed regulation (20 C.F.R. 416.336) which affords persons making an oral inquiry about their possible eligibility for Supplemental Security Income (SSI) benefits the same protection as a person making a written inquiry--that is, an opportunity to have their benefits computed from the date of inquiry provided they are found eligible after filing an application. However, the procedures to be followed in handling and processing oral inquiries in many cases are repeated when the claimant files an application. Furthermore, if the claimant files an application at a Social Security field office other than the office that handled the initial oral or written inquiry, that field office may not be aware of any previous inquiries and the actions taken on them. Using the SSI application for oral inquiries and automating the manually prepared documentation associated with the application would help SSA to improve its inquiry and application processes for SSI benefits.

PROTECTING INDIVIDUAL'S BENEFITS  
THROUGH WRITTEN AND ORAL INQUIRIES

Since the beginning of the SSI program, SSA has computed benefits based on the date a written inquiry was made concerning possible SSI eligibility; provided the claimant completed a formal application within 30 days and was found to be eligible. 1/ However, SSA did not

1/ In April 1978 the period was extended to 60 days to coincide with the longer time period provided claimants who make an oral inquiry.

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afford the same benefit protection to claimants making oral inquiries about their potential eligibility for SSI benefits. In these cases, benefits could only be computed from the date a formal application was filed with SSA.

In 1975 the SSI Study Group was established to evaluate the SSI program and provide suggestions for administrative and legislative improvements. The group found that in some SSA field offices, no record was maintained on claimants who, through an interview with SSA personnel, were informally told that they were ineligible for benefits. Therefore, the person informally denied benefits had no basis on which to appeal the denial. In their January 1976 report the Group recommended that specific rules be developed and a written record be established and maintained for all persons informally denied benefits.

Between November and December 1976, SSA conducted a pilot study at several SSA field offices and teleservice centers to determine the operational implications in documenting oral SSI inquiries and informal denials. Based on the results of this study, regulations and operating procedures were developed in the spring of 1978 requiring SSA field offices to:

--Complete a questionnaire (Record of SSI Inquiry, Form SSA-3462).

--If found to be ineligible, give a written notice to the claimant indicating the reasons for the informal denial and inviting the individual to file an application to obtain a formal determination.

--If found to be potentially eligible, advise the claimant of his/her potential eligibility and recommend that a formal application be filed.

--Maintain a copy of the questionnaire, the written denial notice, and other pertinent documentation in the servicing field office for 90 days (30 days beyond the close of the 60 day protected filing period), at which time the file would be purged.

DUPLICATION OF THE CURRENT  
INITIAL CLAIMS PROCESS

The questionnaire which is filled out for oral inquiries duplicates almost all of the questions contained on the formal application. While the application asks the claimant more precise information directed at their potential eligibility for benefits, both are used to obtain information concerning a claimants' name, date of birth, social security number, citizenship, age, blindness or disability, earned and unearned income, resources, and living arrangements. If during or after the oral inquiry, a claimant files an application for a formal decision, the servicing field office must either retranscribe the data from the questionnaire to the application, or re-ask the claimant the same questions. If the formal application was initially used for oral inquiries to document information needed to determine a claimants potential eligibility for benefits, it would eliminate much of the work involved later when the claimant files an application.

Currently, when a formal application for SSI benefits has been adjudicated by SSA, an automated notice of award or denial is generated by SSA's SSI computerized system and mailed to the claimant. The oral and written inquiry process also requires a written denial notice, however, it is prepared manually. Incorporating the inquiry notice into the SSI computerized system would save clerical and other costs associated with preparing and mailing manual notices. Additionally, using the computer would facilitate record keeping and provide a source of information to field offices on claimants who may become eligible in the future based on changes in their circumstances or changes in the law which establishes basic program eligibility requirements.

File folders containing a copy of the written inquiry and/or, questionnaire, and the written denial notice are required to be maintained in the field offices at which the inquiry was made, or in the field office which services the claimant's geographic area if the inquiry was handled by a teleservice center. Because the file folders are maintained at a particular location, there is no way of knowing the protected filing date that resulted from the inquiry if the claimant goes to a different field office to file a formal application, unless the claimant provides copies of the inquiry documentation to the field office. If the manually prepared

documentation was incorporated into the SSI computerized system, an automated record would exist allowing field offices to obtain information on claimants previously found potentially eligible for SSI benefits--thus a claimant's filing date would be better protected in those instances where the claimant went to a different field office to file the formal application.

SAFEGUARDS NEEDED TO DETECT POTENTIAL  
PROGRAM FRAUD AND ABUSE

Under the current procedure of manually preparing and maintaining records of inquiries at only one field office, it is difficult to identify claimants who falsify eligibility information when "shopping around" for SSI benefits. According to SSA personnel interviewed during visits to various field offices, some claimants contact more than one field office to get on the SSI rolls and obtain the highest benefits possible. These claimants inquire about the SSI program in one field office, are denied and told why they were denied, and subsequently file an application at another field office, omitting the information which previously made them ineligible. An automated record would help detect these claimants, thus preventing the award of potentially fraudulent or erroneous benefits.

CONCLUSIONS

In order to remove the redundancy of processing, provide better protection of a claimant's filing date, and provide a method for detecting claimants who falsify eligibility information, the oral and written inquiry process should be incorporated into the existing SSI computerized system. This can be accomplished by (1) eliminating the new oral inquiry questionnaire and using the formal application appropriately identified as an oral inquiry rather than a formal application, (2) entering the information obtained into the SSI computerized system, (3) allowing the SSI computerized system to issue the written notice of denial, and (4) developing an automated methodology for field offices to obtain information on oral or written inquiries and any prior reasons for denial.

RECOMMENDATIONS

We recommend that the documentation involved in handling and processing oral and written inquiries be incorporated into the SSI computerized system, and that the use of the oral inquiry questionnaire, and manually prepared notices be discontinued.

Please advise us of the action you plan to take concerning these recommendations.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Michael Zimmerman", with a long horizontal flourish extending to the right.

Michael Zimmerman  
Assistant Director