



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

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HUMAN RESOURCES
DIVISION

AUG 29 1985

Mr. Fegol _____
 Mr. Denmore _____
 Mr. Goldstein _____
 Mr. Ferabaugh _____
 Mr. May _____
 Associate Director _____
 Control Desk *JB 8/29/85*
 File _____

Mrs. Martha A. McSteen
Acting Commissioner of Social Security
Department of Health and Human
Services

Dear Mrs. McSteen:

Subject: Improving the Quality of Social Security
Administration Notices (GAO/HRD-85-96)

We have been reviewing the Social Security Administration's (SSA's) Clear Notices Project--one of eight major initiatives you established in March 1984 to improve SSA's service to the public. Because we believe the project has made reasonable progress toward its goal and will likely result in improved notices, we are terminating our current review.

To strengthen its efforts to produce clear notices, we are recommending that SSA periodically obtain feedback directly from SSA clients and use such feedback to systematically evaluate changes in the clarity of notices. Such information should provide valuable insights into the nature and extent of progress SSA is making and also help identify problems clients may have.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our review sought to answer two questions: Are improved notices likely to result from SSA's current efforts? Is there anything more that could be done to help produce clear notices? In addressing these questions we (1) determined the detailed nature of the current notice problems through discussions with SSA personnel in headquarters and at field offices in Region III (Philadelphia) and at the Mid-Atlantic Program Service Center; (2) examined and analyzed the Clear Notices Project's objectives, rationale, accomplishments, and milestones; and (3) discussed the project's progress with project members and affected units. Although we reviewed some notices to confirm that problems exist, we did not evaluate the clarity of notices or the causes of current problems. SSA's notice problems have been publicized and are well documented.

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We discussed a draft of this report with directly responsible SSA staff to obtain their views, which were incorporated as appropriate. The staff generally concurred with our observations and recommendations. Our work was performed in accordance with generally accepted government auditing standards.

POOR QUALITY NOTICES--A SIGNIFICANT
AND PERSISTENT PROBLEM

The term "notice" generally refers to correspondence to individuals concerning their benefits or eligibility under programs administered by SSA. Unclear notices can confuse and frustrate SSA clients and--because clients often call or visit SSA offices for explanations--create additional work for SSA.

Notices originate at SSA headquarters, six program service centers, and more than 1,300 district and branch offices. Most notices are computer generated. The remainder are manually generated or are a manual/computer combination. Although the number of notices SSA prepares is not known, computer-generated and manual/computer combination notices amount to more than 40 million annually.

The Clear Notices Project was established in April 1984 and is scheduled to end September 30, 1986. To improve notices, the project staff began 12 initiatives, 5 of which are completed (see enc. I). Completed initiatives include standardizing notice content and format agency-wide and cataloging notice language. Ongoing initiatives include revising existing notices in accordance with notice standards and testing proposed notice language with notice recipients. To date the project has produced changes in the language and format of some notices and, in our view, has improved their clarity (see enc. II for an example).

Some initiatives are complex undertakings and will extend beyond termination of the Clear Notices Project. One, involving the revision of initial claims notices for the retirement, survivors, and disability insurance programs, depends on the implementation of SSA's Claims Modernization Project. This project, which involves automating the claims process in SSA field offices, is only beginning and is not expected to be fully implemented until 1988.

Despite numerous past SSA attempts to improve notices, the project statement for the current effort says that today "notices lack accuracy, clarity and conciseness." The persistence and complexity of this problem was summed up more than 5 years ago in SSA's fiscal year 1979 annual report:

"SSA has always been committed to notices to the public that are understandable and complete. But, despite considerable efforts in the past, that commitment has not always been fulfilled. There has been significant public criticism of SSA's notices. The complexities of the program, and the factual situations that must be dealt with in many cases, make it difficult to provide simple explanations. Also, in many instances language of SSA notices has been ordered by courts or agreed to in a court settlement."

According to the project director for the Clear Notices Project and others, earlier clear notice initiatives foundered because of the lack of continued management support and the urgency of higher priority issues. We believe that continuity of management support is crucial and are encouraged thus far with the support that top SSA management has given this project. Continuity also is important to the life of the project. At present, the project's planned termination date is September 30, 1986. The project director told us, however, that the project staff will recommend any actions beyond the planned termination date that are necessary to meet the project's objectives. We concur with this approach.

NEED TO EVALUATE AND OBTAIN
FEEDBACK ON QUALITY OF NOTICES

SSA does not periodically evaluate the clarity of its notices or solicit feedback from clients. SSA relies primarily on ad hoc feedback from clients who contact SSA offices about notices they do not understand. SSA does not systematically collect and analyze such information. SSA management needs feedback to have some sense of whether the clarity of the notices is getting better or worse and to pinpoint specific problems.

The need for feedback is to some extent recognized within SSA. Initiative #4 of the Clear Notices Project provides for testing proposed notice language with actual or potential notice recipients. Also, SSA's Office of Assessment is considering a proposal to expand its Quality Assurance Program to include an assessment by SSA reviewers of the clarity, conciseness, and readability of notices. In addition to field testing proposed language and expanding its quality assurance reviews to include notice quality, SSA could also systematically draw on the experiences of staff in SSA field offices who deal with clients who do not understand a particular notice.

We believe field testing proposed notice language is prudent and that the proposal to expand the scope of SSA's

Quality Assurance Program could give SSA useful management information on notice quality. Without some means of evaluating the quality of notices, the extent of progress will be uncertain.

There are a number of ways to systematically evaluate notice clarity. SSA should obtain and evaluate feedback from clients who receive notices because their views are paramount. One way to get client feedback would be to periodically survey a sample of notice recipients.

The director of the Clear Notices Project said she favored feedback from clients and systematically evaluating notice quality. She added, however, that in today's tight budget environment, the cost of obtaining feedback could be an obstacle. She also said that sending questionnaires to notice recipients could be viewed as contrary to the government's goal of minimizing paperwork imposed on the public.

We appreciate, and share, concerns that neither the budget nor the public be burdened unnecessarily. However, to avoid the wasted time, money, and related inconvenience that the agency and its clients can experience if even a fraction of the 40 million notices mailed annually is unclear, we believe SSA should find a cost-effective way of obtaining client feedback and evaluating progress.

RECOMMENDATIONS TO THE ACTING
COMMISSIONER OF SOCIAL SECURITY

We recommend that you develop and implement a strategy to obtain periodic feedback from SSA clients on the clarity of SSA notices and use such feedback to systematically evaluate SSA progress in improving and maintaining notice clarity.

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Copies of this letter are being sent to the Secretary of Health and Human Services and the Department's Office of Inspector General. We would appreciate being advised of actions taken or planned on our recommendations.

Sincerely yours,



Joseph F. Delfico
Associate Director

Enclosures - 2

STATUS OF CLEAR NOTICES PROJECT INITIATIVESAS OF JULY 13, 1985

	<u>Initiative</u>	<u>Status</u>
1.	<u>Establish Notice Clearance and Review Staff</u> A full-time staff has been established to serve as the SSA focal point for notices, to review and revise notices, to coordinate notice clearance, and to pursue specific project initiatives.	Completed
2.	<u>Establish Notice Clearance Process</u> A standard method of clearing notices has been established that is designed to satisfy policy, legal, readability, systems, and operational requirements.	Completed
3.	<u>Establish Notice Standards</u> The project staff has developed notice standards covering the appearance and content of notices. These standards will be applied agency-wide.	Completed
4.	<u>Test Revised Notice Language With Actual or Potential Notice Recipients</u> A contract to test actual notice language with members of the public will be awarded in October 1985. This test will provide support for proposed notice design and language and demonstrate how changes should be made to make notices more effective.	Ongoing
5.	<u>Develop a Catalog of All Notice Language</u> SSA has developed a catalog of existing notice language which will facilitate a review of the language to ensure that it is necessary and consistent between systems.	Completed

	<u>Initiative</u>	<u>Status</u>
6.	<p><u>Revise Manual Notices in Accordance with SSA Notice Standards</u></p> <p>These revisions focus on simplifying language and organizing notices that are not computer generated. The revisions are underway, with highest volume notices being done first.</p>	Ongoing
7.	<p><u>Revise Automated Initial Claims Notices in Accordance With SSA Notice Standards</u></p> <p>SSA is revising the title II initial claims processing system as part of its overall Claims Modernization Project. This initiative will help ensure the revision of language for these notices and the consistency of the notices with the standards.</p>	Ongoing
8.	<p><u>Revise Automated/Partially Automated Post-entitlement/Posteligibility Notices</u></p> <p>SSA will use the catalog of existing notice language it developed to make changes to automated/partly automated notices language. In addition, SSA is exploring methods of further automating the partially automated notices.</p>	Ongoing
9.	<p><u>Explore the Feasibility of Having Vendors Produce Some Postentitlement/Posteligibility Notices</u></p> <p>Because systems improvements necessary to carry out certain initiatives of the Clear Notices Project will not be completed in the short term, SSA explored the feasibility of using vendors to improve the clarity and timeliness of postentitlement/posteligibility notices in the interim. SSA has decided not to use vendors for this purpose because of logistical problems and potential time delays.</p>	Completed

- | | <u>Initiative</u> | <u>Status</u> |
|-----|---|---------------|
| 10. | <u>Identify Additional Automated Support for Notice Issuance</u>

SSA is procuring automated mailroom equipment for the program service centers and headquarters and upgraded software for word processors at the program service centers. | Ongoing |
| 11. | <u>Establish Requirements for In-Line Quality Assurance of Manually Prepared Notices</u>

The intention of this initiative is to develop standardized quality reviews at points where manual notices are produced. | Ongoing |
| 12. | <u>Achieve Short-Term Notice Improvement Through the Use of Laser Printers</u>

Laser printers being installed at SSA headquarters will print selected categories of notices centrally, pending installation of laser printers at the program service centers. This will make it possible to produce notices according to the notice standards, including use of upper and lower case letters to improve readability. | Ongoing |

Social Security Representative Payee Notice

From: Mid-Atlantic Program Service Center
Philadelphia, Pennsylvania 19123

Date:

Beneficiary Name
Street Address
City/State/Zip Code

Claim Number: xxx-xx-xxxx

Based on information we have received, we have determined that your interests would be served by the payment of your monthly Social Security benefits on your behalf to

Name of Representative Payee - (Payee Name)

Effective Month -

July 1985

Monthly Benefit Amount -

\$ 545.00

Medicare Premium Deduction -
(If applicable)

\$

Monthly Payment Amount -
(After Medicare deduction(s))

\$ 545.00

Because of a change in the law, your regular payment will be rounded down to the dollar even though your monthly benefit of record may be in dollars and cents. The representative payee will receive and manage these payments for your use and benefit.

If you have any objection to the appointment of a representative payee or to the selection of this particular representative payee, you may request that your case be re-examined. If you want this reconsideration, you must request it not later than 60 days from the date you receive this notice. You may make your request through any Social Security office. If additional evidence is available, you should submit it with your request. Please read the enclosed leaflet for a full explanation of your right to question the determination.

Enclosure:
SSA Publication No. 05-10058

Social Security Administration
Retirement, Survivors and Disability Insurance
Important Information

Mid-Atlantic Program Service Center
300 Spring Garden Street
Philadelphia, PA 19123

Beneficiary Name
Street Address
City/State/Zip Code

Date:

Claim Number: XXX-XX-XXXX

We have selected (Payee's Name) to be your representative payee. Your payee will receive your checks each month and will use this money for your needs.

Payment Information

We will begin sending your regular monthly check of \$545.00 to your payee on or about July 3, 1985.

Your Right to Question Our Decision

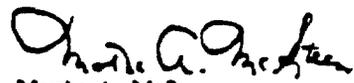
If you think you should get your own checks or that we should pay your checks to another payee, you can ask us to review your case. We call this a reconsideration. We'll also look at any new information you may want to give us.

How To Ask For A Reconsideration

You have 60 days from the date you get this letter to ask us for a reconsideration. Please read the pamphlet we've enclosed called, "Your Right To Question The Decision Made On Your Social Security Claim" for a full explanation of your reconsideration rights.

If You Have Any Questions

If you have any questions, you should call, write or visit any social security office. If you visit an office, please bring this letter with you. It will help us answer your questions.


Martha A. McSteen
Acting Commissioner of Social Security

Enclosure:
Pamphlet No. HEW 76-10058