



OTHER REPORTING REQUIREMENTS

PAYMENT INTEGRITY

OVERVIEW

We are committed to ensuring we issue accurate payments to eligible individuals at the right time. We take seriously our responsibilities to ensure eligible individuals receive the benefits to which they are entitled, and to safeguard the integrity of benefit programs to better serve recipients. Our internal quality reviews, which are validated by a third-party auditor, indicate that our fiscal year (FY) 2021 Old-Age, Survivors, and Disability Insurance (OASDI) benefit payments were 99.83 percent free of overpayment, and 99.95 percent were free of underpayment. For the same year, 92.83 percent of all Supplemental Security Income (SSI) payments were free of overpayment, and 98.45 percent were free of underpayment. FY 2022 data is not yet available.

While our payment accuracy rates, including both overpayments and underpayments, are high, even small error rates add up to substantial improper payment amounts given the magnitude of the benefits we pay each year. For instance, in FY 2021, we issued over \$1 trillion in benefit payments. Our combined overpayments (OP) and underpayments (UP) for OASDI totaled approximately \$2.49 billion. The combined overpayments and underpayments for SSI totaled approximately \$4.91 billion. With each tenth of a percentage point in payment accuracy representing about \$1.128 billion in OASDI and \$56.2 million in SSI program outlays, we are focused on combatting the leading causes of improper payments and improving program integrity to protect taxpayer dollars.

As good stewards, we continue to look for ways to do business better by addressing the root causes of improper payments and improving payment accuracy. We are committed to continually improving the administration of our programs and working to identify and address potential inequities.

BACKGROUND

Our program integrity workloads are critical to ensuring efficient programs and accurate payments in our Old-Age and Survivors Insurance (OASI), Disability Insurance (DI) (referred to as OASDI when discussing them in combination), SSI, and Administrative Payments programs. As good stewards of our resources and taxpayer funds, these workloads help ensure eligible individuals receive the benefits to which they are entitled and safeguard the integrity of benefit programs to better serve recipients by confirming eligibility and preventing fraud. We remain focused on the integrity of our programs, including minimizing improper payments (IP). “Ensure Stewardship of SSA Programs” is a Strategic Goal in our [Agency Strategic Plan for Fiscal Years \(FY\) 2022–2026](#). Each year, we report IP findings, both OPs and UPs, from our stewardship reviews of the nonmedical aspects of the OASDI and SSI programs. Regarding the medical aspects of our disability programs, we conduct continuing disability reviews (CDR) to determine whether disability beneficiaries continue to meet the programs’ medical criteria. Terminating disability benefits after a CDR does not necessarily mean that the original determination was incorrect; it means the beneficiary’s medical condition has improved and the beneficiary no longer meets our definition of disability. Therefore, we consider the benefits received before improvement to be proper.

On March 2, 2020, S. 375, the *Payment Integrity Information Act of 2019* (PIIA) was signed into law. This law changed government-wide IP reporting requirements by repealing and replacing the *Improper Payments Information Act of 2002*, the *Improper Payments Elimination and Recovery Act of 2010*, the *Improper Payments Elimination and Recovery Improvement Act of 2012*, and the *Fraud Reduction and Data Analytics Act of 2015*. On March 5, 2021, the Office of Management and Budget (OMB) published a revised version of OMB Circular No. A-123, Appendix



C, *Requirements for Payment Integrity Improvement*, to implement the provisions of PIIA. The goal of the revised version of OMB Circular A-123, Appendix C is to transform the payment integrity compliance framework and create a more comprehensive and meaningful set of requirements to allow agencies to spend less time complying with low-value activities and more time researching the underlying causes of IPs, balancing payment integrity risks and controls, and building the capacity to help prevent future IPs.

In accordance with OMB guidelines, we report as improper those payments that resulted from:

- Our mistake in computing the payment;
- Our failure to obtain or act on available information affecting the payment;
- A beneficiary's failure to report an event; or
- A beneficiary's incorrect report.

Effective FY 2021, all programs with annual outlays over \$10,000,000 will fall into one of two possible classifications: Phase 1 or Phase 2.

Programs that are not likely to have an annual amount of IPs plus annual unknown payments above the statutory threshold (which is either (a) both 1.5 percent of program outlays and \$10,000,000 of all program payments made during the fiscal year, or (b) \$100,000,000) are referred to as being in Phase 1. Per this definition, our Administrative Payments program is considered to be in Phase 1 for OMB reporting purposes. If a program in Phase 1 determines that it is likely to annually make IPs plus unknown payments above the statutory threshold then the program will move into Phase 2 the following year. Once in Phase 2 a program will have additional requirements such as reporting an annual IP and unknown payment estimate. Our OASDI and SSI programs are considered to be in Phase 2 for OMB reporting purposes. Information about the IPs, root causes, and corrective actions in our programs can be found on [PaymentAccuracy.gov](https://www.paymentaccuracy.gov).

In addition, a Phase 2 program that reports IPs resulting in monetary loss in excess of \$100,000,000 annually is considered a High-Priority program. Our OASDI and SSI programs meet the definition of High-Priority programs. This report provides a summary of our payment integrity activities and results for our High-Priority programs. There were no changes in payment integrity methodology for the reporting period. The information presented in this report complies with the guidance provided in OMB Circular No. A-123, Appendix C, *Requirements for Payment Integrity Improvement*, and OMB Circular No. A-136, *Financial Reporting Requirements*.



OASDI IMPROPER PAYMENTS

OASDI IMPROPER PAYMENT EXPERIENCE

Based on our stewardship reviews, we estimate that we paid approximately \$1.1 trillion to OASDI beneficiaries in FY 2021. Of that total, we estimate \$2.0 billion were OPs, representing approximately 0.17 percent of outlays. We estimate that UPs during this same period were \$0.5 billion, the equivalent of approximately 0.05 percent of outlays. The following table shows our estimated IPs in the OASDI program broken out by OMB's IP cause categories.

**OASDI IMPROPER PAYMENTS
FY 2021
(DOLLARS IN MILLIONS)**

	Dollars	Percent of Outlays
Outlays	\$1,127,518.99	
Proper Payments	\$1,125,028.01	99.78%
Improper Payments	\$2,490.98	0.22%
Overpayments	\$1,972.26	0.17%
Within agency control	\$1,523.29	0.14%
Data does not exist	\$0.00	0.00%
Inability to access data	\$0.00	0.00%
Failure to access data	\$1,523.29	0.14%
Outside agency control	\$448.97	0.04%
Data does not exist	\$0.00	0.00%
Inability to access data	\$448.97	0.04%
Failure to access data	\$0.00	0.00%
Non-Monetary Loss	\$518.72	0.05%
Underpayments	\$518.72	0.05%
Data does not exist	\$0.00	0.00%
Inability to access data	\$49.40	0.00%
Failure to access data	\$469.34	0.04%
Technically Improper Payment	\$0.00	0.00%
Unknown Payments	\$0.00	0.00%
Improper Payments + Unknown Payments	\$2,490.98	0.22%

Notes:

1. Outlay and IP amounts are for FY 2021. They represent estimated amounts from the annual stewardship reviews and may vary from actual amounts. FY 2022 data will be available in the summer of FY 2023.
2. There may be slight variances in the dollar amounts and percentages reported on [PaymentAccuracy.gov](https://www.paymentaccuracy.gov) due to rounding of source data. We derive percentages from unrounded source data.
3. Totals may not equal the sum of amounts due to rounding.
4. OMB Circular No. A-123, Appendix C, *Requirements for Payment Integrity Improvement*, defines IP cause categories.



OASDI IMPROPER PAYMENT CAUSES AND CORRECTIVE ACTIONS

Our stewardship review findings over the last five years show that the major causes of OPs in the OASDI program are beneficiaries' employment activity, referred to as substantial gainful activity (SGA), and errors in computations. The major cause of UPs is errors in computations. Below, we discuss corrective actions for these major causes. Additional information about the IPs, root causes, and corrective actions in the OASDI program can be found on [PaymentAccuracy.gov](https://www.paymentaccuracy.gov).

SUBSTANTIAL GAINFUL ACTIVITY

Description:

SGA is continuously the leading cause of OPs in the OASDI program. When disability beneficiaries work, several factors determine whether they can continue to receive monthly benefits. Beneficiaries' failure to report earnings in a timely manner accounts for 83 percent of SGA-related IPs and our failure to take the proper actions to process work reports accounts for the remainder.

Payment errors based on SGA correspond to the following OMB IP cause categories in the OASDI Improper Payments table: Overpayments/Within agency control/Failure to access data; and Overpayments/Outside agency control/Inability to access data.

Total projected OP deficiency dollars for FY 2017 through FY 2021: \$4.5 billion

Annual average: \$0.9 billion

Corrective Actions:

We take seriously our responsibilities to ensure the right payments are made to individuals, and we are exploring administrative actions that will make it easier to report wages, as well as ways we can obtain real time wage data to reduce IPs. We are taking the following actions to address IPs related to SGA:

- **Payroll Information Exchange (PIE):**

Beneficiaries' failure to report work currently accounts for 83 percent of IPs related to SGA. To reduce the reliance on self-reporting of wages, we are developing new wage reporting tools, such as an information exchange with commercial payroll providers. We implemented the first phase of the *Bipartisan Budget Act of 2015* section 824, now referred to as PIE. In September 2017, we began collecting and storing authorizations from SSI and DI applicants and beneficiaries to obtain wages via the information exchange. In September 2019, we awarded a contract to Equifax. In September 2020, we built the data exchange and the Wage and Employment Information repository to house wages received via PIE from payroll data providers and myWageReport (myWR). In March 2021, we developed the capacity to implement SSI and some DI automation measures that will allow the wages received via PIE to post to the SSI and DI records. In FY 2022, we refined the business process to automate wage data obtained from Equifax and are working on updating our regulations. We are conducting planning and analysis to develop automated employer participation notices and a Limited Issue reminder to address incoming wage and employment information that does not automatically post to the records, which are scheduled for implementation in FY 2023.

- **CDR Product:**

The Field Office Disability Modernization project, which includes the CDR Product (which replaces the eWork legacy system), will modernize and streamline the work CDR process to increase efficiencies and reduce IPs. A work CDR is a review of the eligibility requirements regarding whether a disabled beneficiary is engaging in SGA. The multifaceted product is comprised of four separate workstreams, across several component business and systems sponsors. We implemented the consolidated wage page, which displays wages and other claimant data from multiple agency sources. Field office technicians can review relevant wage data sources in one location to perform their work on CDR analysis.



- **myWR:**

Section 826 of the *Bipartisan Budget Act of 2015* required the Commissioner to establish and implement a system permitting DI beneficiaries to report their earnings electronically. In September 2017, we released the myWR online application, which allows DI beneficiaries and representative payees to report wages to us and provides a receipt for the report that the reporter can view, print, and save. DI self-reporters and their representative payees can report wages that occurred within a two-year timeframe from the reporting date. In June 2018, we added functionality to myWR that allows SSI and concurrent (SSI and DI) wage reporting. In FY 2020, we developed a training video for the public including information about the importance of creating a [my Social Security](#) account, how to submit wages using myWR, who can report, and reminders on reporting responsibilities. We shared the video with the public via digital and social media outlets (e.g., YouTube) to promote the use of telephone wage reporting, mobile wage reporting, and myWR. In November 2020, we added the video link to monthly email reminders to participants in myWR. We promote further use of myWR on social media. In FY 2022, we added the training video to our Instagram, Twitter, and Facebook social media accounts, and on Social Security TV in field office reception areas. We are working on a new wage reporting video to promote the three reporting options, myWR through the [my Social Security](#) portal, SSA Mobile Wage Reporting, and SSI Telephone Wage Reporting, on our social media outlets. The new video will be available in the first quarter of FY 2023.

- **WorkSmart:**

WorkSmart is a tool that identifies DI beneficiaries whose earnings put them at risk of being overpaid. We created the Work Smart project to reduce and prevent IPs and complete work CDRs more efficiently by identifying earnings earlier, identifying cases that have earnings above SGA and are still receiving benefits, and prioritizing cases that are most likely to end in an SGA cessation.

COMPUTATIONS

Description:

Errors in computations are a major cause of OASDI OPs and UPs. We determine a person's benefit amount based on several factors, including age, earnings history, and the type of benefit awarded. Inaccurate information and administrative mistakes can cause errors in calculating benefits.

Payment errors based on computations correspond to the following OMB IP cause categories in the OASDI Improper Payments table: Overpayments/Within agency control/Failure to access data; Overpayments/Outside agency control/Inability to access data; Underpayments/Inability to access data; and Underpayments/Failure to access data.

Total projected OP and UP deficiency dollars for FY 2017 through FY 2021: \$3.3 billion

Annual average: \$0.7 billion

Corrective Actions:

We are taking the following actions to address IPs related to Computations:

- **Automation:**

In FY 2021, we rolled out UiPath, which is a new software for creating automated "robotic" programs that will perform routine or repetitive tasks. Robotic Processing Automation (RPA), or "BOTS," are available to Processing Center technicians to assist with processing manual awards or post entitlement actions. Since January 2021, five BOTS were placed into production. Use of the BOTS reduces keystrokes and manual coding, and detects exceptions and alerts before they occur. In FY 2023, we plan to enhance the existing RPA scripts and begin development and implementation of a series of BOTS that will automate computations and input of complex and error prone windfall offset payments.



- **Evaluation:**

The Windfall Elimination Provision (WEP) applies when the wage earner receives Social Security retirement or disability benefits, and also is entitled to a pension based on non-covered work. Non-covered pensions are paid by employers that do not withhold Social Security taxes and may be based on earnings from employment in the United States or another country.

The Government Pension Offset (GPO) provision adjusts Social Security spouses or widow(er)'s benefits for those who receive a non-covered pension from a Federal, State, or local government in the United States. When GPO applies, the Social Security monthly benefit amount is reduced by two-thirds of the amount of the non-covered government pension.

We developed a comprehensive corrective action plan to address multiple underlying causes of WEP and GPO IPs. In August 2020, we released a systems enhancement that removed a WEP exclusion from the Modernized Claims System to prevent its misapplication. In FY 2022, we monitored the progress of the completed corrective actions. We developed a logic model framework to measure the effectiveness of completed corrective action that includes establishing benchmarks to evaluate the corrective actions, assessing the impact, if possible, and determining whether additional mitigation activities are necessary.



SSI IMPROPER PAYMENTS

SSI IMPROPER PAYMENT EXPERIENCE

Based on our stewardship reviews, we estimate that we paid approximately \$56.3 billion to SSI recipients in FY 2021. Of that total, we estimate \$4.0 billion were OPs, representing approximately 7.17 percent of outlays. We estimate that UPs during this same period were \$0.9 billion, the equivalent of approximately 1.55 percent of outlays. The following table shows our estimated IPs in the SSI program broken out by OMB's IP cause categories.

**SSI IMPROPER PAYMENTS
FY 2021¹
(DOLLARS IN MILLIONS)**

	Dollars	Percent of Outlays
Outlays	\$56,271.12	
Proper Payments	\$51,365.11	91.28%
Improper Payments	\$4,906.01	8.72%
Overpayments	\$4,032.52	7.17%
Within agency control	\$265.01	0.47%
Data does not exist	\$0.00	0.00%
Inability to access data	\$0.00	0.00%
Failure to access data	\$265.01	0.47%
Outside agency control	\$3,767.51	6.70%
Data does not exist	\$465.05	0.83%
Inability to access data	\$3,302.45	5.87%
Failure to access data	\$0.00	0.00%
Non-Monetary Loss	\$873.49	1.55%
Underpayments	\$873.49	1.55%
Data does not exist	\$398.94	0.71%
Inability to access data	\$299.39	0.53%
Failure to access data	\$175.17	0.31%
Technically Improper Payment	\$0.00	0.00%
Unknown Payments	\$0.00	0.00%
Improper Payments + Unknown Payments	\$4,906.01	8.72%

Notes:

1. Outlay and IP amounts are for FY 2021. They represent estimated amounts from the annual stewardship reviews and may vary from actual amounts. FY 2022 data will be available in the summer of FY 2023.
2. There may be slight variances in the dollar amounts and percentages reported on [PaymentAccuracy.gov](https://www.paymentaccuracy.gov) due to rounding of source data. We derive percentages from unrounded source data.
3. Totals may not equal the sum of amounts due to rounding.
4. OMB Circular No. A-123, Appendix C, *Requirements for Payment Integrity Improvement*, defines IP cause categories.



SSI IMPROPER PAYMENT CAUSES AND CORRECTIVE ACTIONS

Our stewardship review findings over the last five years show that the major causes of OPs in the SSI program are changes in financial accounts, wages, and in-kind support and maintenance (ISM), whether because of beneficiaries' failure to report or our failure to update benefits in a timely manner. The major cause of UPs is changes to ISM due to beneficiaries' failure to report or our failure to update benefits in a timely manner. Below, we discuss corrective actions for these major causes. Additional information about the IPs, root causes, and corrective actions in the SSI program can be found on [PaymentAccuracy.gov](https://www.paymentaccuracy.gov).

FINANCIAL ACCOUNTS

Description:

The leading cause of SSI OPs is financial accounts with countable resources in excess of the allowable resource limits. When an applicant, recipient, or deemor has financial accounts with values exceeding the allowable resource limits, these accounts may result in periods of SSI ineligibility.

We use the Access to Financial Institutions (AFI) tool to verify financial accounts. For institutions that do not participate in AFI, we request bank information from the individual. AFI effectively detects unknown (unreported) accounts and identifies excess amounts in known accounts. However, because it works retroactively by providing current and past monthly balances, it is more of a detection tool than an IP prevention tool.

Payment errors based on financial accounts correspond to the following OMB IP cause categories in the SSI Improper Payments table: Overpayments/Within agency control/Failure to access data; and Overpayments/Outside agency control/Inability to access data.

Total projected OP deficiency dollars for FY 2017 through FY 2021: \$7.1 billion

Annual average: \$1.4 billion

Corrective Actions:

We are taking the following actions to address IPs related to Financial Accounts:

- **Non-medical Redeterminations (RZ)/Limited Issues (LI):**

Conducting non-medical SSI RZs ensures recipients receive the correct benefit amounts. An RZ is a complete review of a recipient's or couple's non-medical eligibility factors (resources, income, and living arrangements) to determine whether the recipient or couple has remained eligible since the time of the previous decision, is still eligible for SSI, and has been receiving and will continue to receive the correct SSI payment amount. To ensure the most cost-effective investment of agency resources, we use an automated method to identify cases for RZ most likely to incur OPs. In FY 2022, we completed more than 2,200,000 SSI non-medical RZs and LIs. An LI is a review of a specific issue or event related to a recipient's or couple's non-medical eligibility factors to determine whether the recipient or couple is still eligible for and receiving the correct SSI payment.

- **Systems Enhancements:**

We are investing in information technology (IT) modernization to provide our employees with user-friendly systems and tools to better service the public.

A few times a year, we issue SSI payments prior to the first of the month for which they are due. This occurs whenever the first of the month falls on a non-Federal workday (e.g., Saturday, Sunday, or Federal holiday). Early deposited benefits (EDB) can adversely affect SSI eligibility if we do not properly exclude the early deposit from the first of the month balance. In October 2020, we implemented two EDB-related enhancements to the SSI Claims System. The first enhancement alerts field office technicians that EDB



may need to be excluded, and the second enhancement provides a link to the SSI Claims Financial Institutions page.

We must provide a single unified process for benefits applications to assist our frontline employees in better serving the public. The Consolidated Claims Experience (CCE) will be a single-entry point for employees to process all agency benefits. CCE includes eligibility screening, initial claims intake processing, and post-entitlement activities. CCE will automate computations, reduce manual actions, assist in the identification of potential or missed entitlements, and include dynamic pathing and policy references within the application. In FY 2022, there were two CCE releases in the SSI program to include dynamic path, add policy references, and minimize some manual actions. Currently, only SSI is available in CCE with additional claim types (i.e., OASDI and Title 18) to be added in future releases.

- **Policy/Training Efforts:**

We will pursue workflow adjustments, policy and notice changes, training and reminders for technicians, and automation solutions to improve accuracy. In FY 2022, we clarified policy regarding documentation of direct deposit accounts to ensure that technicians record direct deposit accounts reflected on agency records in the SSI Claims System.

WAGES

Description:

For more than a decade, wage discrepancies have been one of the leading causes of SSI OPs and UPs. Wage discrepancies occur when the recipient or his or her devisor has actual wages that differ from the wage amount we used to calculate the SSI payment, either because the beneficiary failed to report a change, or we failed to make changes to benefits in a timely manner.

Payment errors based on wages correspond to the following OMB IP cause categories in the SSI Improper Payments table: Overpayments/Within agency control/Failure to access data; Overpayments/Outside agency control/Inability to access data; Underpayments/Inability to access data; and Underpayments/Failure to access data.

Total projected OP and UP deficiency dollars for FY 2017 through FY 2021: \$6.2 billion

Annual average: \$1.2 billion

Corrective Actions:

We are taking the following actions to address IPs related to wages:

- **PIE:**

Please see our discussion of PIE under Corrective Actions for Substantial Gainful Activity in the OASDI Improper Payment Causes and Corrective Actions section.

- **myWR:**

Please see our discussion of myWR under Corrective Actions for Substantial Gainful Activity in the OASDI Improper Payment Causes and Corrective Actions section.

- **Non-medical RZs/LIs:**

Please see our discussion of non-medical RZs/LIs under Corrective Actions for Financial Accounts in the SSI Improper Payment Causes and Corrective Actions section.



IN-KIND SUPPORT AND MAINTENANCE

Description:

Over the past 5 years, ISM has been the third leading cause of OPs and the leading cause of UPs. When processing initial claims and post-entitlement reviews, we ask questions to help us determine if recipients are paying their share of household expenses. If recipients are not paying their *pro rata* share, we generally count the difference between the *pro rata* share amount and the actual contribution as income to the recipient in the form of ISM. ISM can be in the form of food, shelter, or both from family, friends, or other third-party sources. SSI recipients and their representative payees are required to notify the agency when a change occurs in household expenses, contributions, or composition. Failure to report or delays in reporting household changes are the primary causes of OP and UP related to ISM. Unlike financial accounts and wages, the agency has no alternative way to obtain information on changes that affect ISM. We rely on reports from recipients and representative payees, who must report ISM changes (e.g., living arrangements) by phone, mail, or in person within ten days after the end of the month when the event happened.

Payment errors based on ISM correspond to the following OMB IP cause categories in the SSI Improper Payments table: Overpayments/Within agency control/Failure to access data; Overpayments/Outside agency control/Data does not exist; Underpayments/Data does not exist; Underpayments/Inability to access data; and Underpayments/Failure to access data.

Total projected OP and UP deficiency dollars for FY 2017 through FY 2021: \$2.8 billion

Annual average: \$0.6 billion

Corrective Actions:

We are taking the following actions to address IPs related to ISM:

- **Policy Clarifications:**

We review ISM-related operating instructions and related statutes and regulations to simplify our processes. Based on our reviews, we issue periodic reminders and policy clarifications, as needed.

- **Sub Regulatory Change:**

When living in the household of another, SSI claimants may be charged ISM unless they are paying their share of expenses. Our policy includes a tolerance that prevents us from assessing ISM if a claimant is within a specific dollar amount of meeting their *pro rata* share. In October 2021, we increased the \$5 tolerance, set in the 1970s, to \$20.

- **Regulatory Change:**

The processes and policies as well as statutory and regulatory requirements to administer ISM are complicated and pose challenges in the administration of our programs. We previously revised our rules to stop counting the value of clothing given to SSI recipients as ISM. We are currently developing a regulation that will stop counting the value of food given to SSI recipients as ISM. We will continue to identify additional regulatory changes that would reduce IPs related to ISM.



ENTITLEMENT REVIEWS AND OFFICE OF THE INSPECTOR GENERAL ANTI-FRAUD ACTIVITIES

We are committed to improving financial management by preventing fraudulent and IPs (see the Payment Integrity section for more information). Section 206 (g) of the *Social Security Independence and Program Improvements Act*, Public Law 103-296, requires us to report annually on the extent to which we reviewed cases of entitlement to monthly OASI and DI benefits (referred to as OASDI when discussing them in combination) and SSI payments; and the extent to which the cases we reviewed were those that involved a high likelihood or probability of fraud.

ENTITLEMENT REVIEWS

Entitlement reviews help ensure that continued monthly payments are correct. We select cases and undertake reviews, both prior to and after effectuation of payment, to ensure that development procedures and benefit awards are correct.

Due to the Coronavirus Disease 2019 (COVID-19) pandemic, we discontinued all quality assurance samples for the third quarter of FY 2020. For CDRs, we discontinued the sample for the third and fourth quarters of FY 2020. As a result, the initial and reconsideration data include only cases reviewed during the first, second, and fourth quarters of FY 2020. The FY 2020 CDR data include only reviews completed during the first and second quarters of FY 2020. We resumed regular CDR sampling in the first quarter of FY 2021.

We conduct the following major entitlement reviews:

DISABILITY QUALITY ASSURANCE REVIEWS

We perform quality assurance reviews of random samples of disability determination services (DDS) determinations to measure our level of accuracy against standards mandated by the regulations. We review initial claims, requests for reconsideration, and determinations of continuing eligibility prior to the effectuation of the DDS determinations. The following table shows the quality assurance accuracy rates for FY 2018 through FY 2022.

QUALITY ASSURANCE REVIEWS

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Percent of State DDS decisions to allow or continue not returned to the DDS offices for correction	96.87%	96.62%	96.62%	97.23%	97.35%
Number of cases reviewed	40,251	40,295	29,588	34,915	32,286
Number of cases returned to the DDS offices due to error or inadequate documentation	1,259	1,360	1,001	967	857



DI PRE-EFFECTUATION REVIEWS

We also perform pre-effectuation reviews of favorable DI and concurrent DI/SSI initial and reconsideration determinations using a risk profiling system to select cases for review. This profiling system helps ensure the cost-effectiveness of pre-effectuation reviews, and it satisfies the legislative requirement that the cases we review are those that are most likely to be incorrect. We also review a sufficient number of CDR continuance determinations to ensure a high level of accuracy in those cases. The following table shows the DI pre-effectuation accuracy rates for FY 2018 through FY 2022.

DI PRE-EFFECTUATION REVIEWS

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Percent of State DDS decisions to allow or continue not returned to the DDS offices for correction	95.03%	94.65%	95.23%	95.26%	95.46%
Number of cases reviewed	252,245	238,616	268,569	266,474	255,200
Number of cases returned to the DDS offices due to error or inadequate documentation	12,538	12,761	12,810	12,641	11,585

SSI PRE-EFFECTUATION REVIEWS

Following legislation enacted in February 2006, we began pre-effectuation reviews of favorable SSI initial and reconsideration adult determinations. As in DI cases, we use a profiling system to select cases for review. The following table shows the SSI pre-effectuation accuracy rates for FY 2018 through FY 2022.

SSI PRE-EFFECTUATION REVIEWS

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Percent of State DDS decisions to allow not returned to the DDS offices for correction	96.52%	96.27%	96.07%	96.47%	96.65%
Number of cases reviewed	81,333	86,779	94,105	105,729	98,540
Number of cases returned to the DDS offices due to error or inadequate documentation	2,834	3,239	3,696	3,734	3,297

CONTINUING DISABILITY REVIEWS

Periodic CDRs are a key activity in ensuring the integrity of the disability program. Through CDRs, we determine whether beneficiaries continue to meet our medical standards for disability. We also conduct a quality review of those decisions. The following table shows the CDR accuracy rates for FY 2018 through FY 2022.

CDR ACCURACY

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Overall accuracy	96.9%	96.5%	96.8%	96.7%	96.9%
Continuance accuracy	98.1%	97.7%	97.6%	97.9%	98.0%
Cessation accuracy	92.3%	92.3%	93.2%	92.0%	92.9%



OASDI AND SSI QUALITY ASSURANCE REVIEWS

Quality assurance reviews assess the accuracy of benefit payments. The following tables show the OASDI and SSI accuracy rates for FY 2018 through FY 2021. Data for FY 2022 are not available at this time. We will report the FY 2022 data in our FY 2023 *Agency Financial Report* (AFR).

OASDI ACCURACY

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Overpayment accuracy	Data not yet available	99.83%	99.83%	99.80%	99.77%
Underpayment accuracy	Data not yet available	99.95%	99.94%	99.95%	99.95%

SSI ACCURACY

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Overpayment accuracy	Data not yet available	92.83%	91.24% ¹	91.87%	91.77%
Underpayment accuracy	Data not yet available	98.45%	98.67%	98.72%	98.52%

Notes:

1. The FY 2021 AFR incorrectly stated the FY 2020 SSI overpayment accuracy rate was 91.25% due to a minor issue in the error tabulation. The rate has been corrected in this AFR.

SSI REDETERMINATIONS

SSI redeterminations are periodic reviews of non-medical factors to ensure that a recipient remains eligible for SSI payments and that we have paid and will continue to pay the recipient the correct amount. The following table shows the number of SSI redeterminations we completed for FY 2018 through FY 2022.

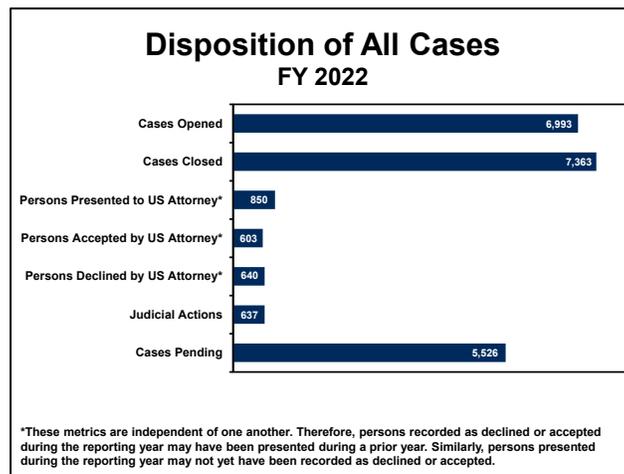
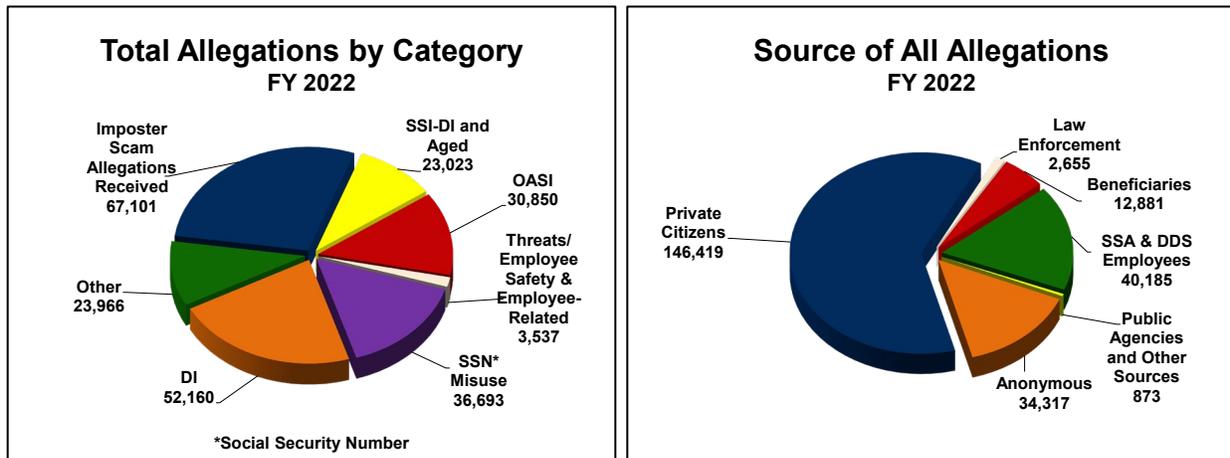
SSI REDETERMINATIONS (IN MILLIONS)

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Number of redeterminations completed	2.20	2.37	2.15	2.67	2.91



THE OFFICE OF THE INSPECTOR GENERAL'S ANTI-FRAUD ACTIVITIES

In FY 2022, we worked with our Office of the Inspector General (OIG), the U.S. Department of Justice, and other Government agencies on cases involving fraud, waste, and abuse as part of our fraud detection and prevention program for safeguarding our assets. In FY 2021, due in part to a widespread imposter scam, OIG received a higher-than-normal volume of allegations. Relative to FY 2021, this fiscal year, we noted an almost 90 percent decrease in the number of imposter scam allegations. The following charts provide information from our OIG concerning fraud and other allegations and cases in FY 2022.



CIVIL MONETARY PENALTY ADJUSTMENT FOR INFLATION

The *Social Security Act* authorizes the Commissioner to impose a civil monetary penalty (CMP) for certain specific violations. Section 1129 of the *Social Security Act* authorizes a CMP against anyone who makes any material false statements or representations to the agency or knowingly withholds a material fact from the agency, to obtain or retain benefits or payments under Titles II, VIII, or XVI of the *Social Security Act*. A CMP may also be imposed against representative payees for the wrongful conversion of Social Security payments entrusted to their care.

Section 1140 of the *Social Security Act* authorizes a CMP to protect the public from advertisements, solicitations, and other communications (including Internet websites and scam telephone calls) that may convey the false impression that we approved, endorsed, or authorized the communication. Section 1140 also prohibits the reproduction and sale of Social Security publications and forms without our authorization and places restrictions on



the charging for services that we provide to the public without charge. The Commissioner delegated authority to enforce our CMP program to the Inspector General.

The *Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015* expanded the categories of penalties that require adjustment for inflation to include CMPs under the *Social Security Act* and requires agencies to: (1) use an interim final rulemaking to adjust the level of CMPs in 2016 with an initial “catch-up” adjustment; (2) continue to make annual adjustments in future years; and (3) report on these adjustments annually. As required, we are providing information on our current CMPs; these amounts include the initial “catch-up” and annual adjustments. We will continue to make annual adjustments in future years and report on these adjustments annually.

CIVIL MONETARY PENALTY ADJUSTMENTS

Statutory Authority	Penalty	Year Enacted	Last Year of Adjustment (via statute or regulation)	Current Penalty Date of Adjustment	Current Penalty Level	Sub-Agency/ Bureau/Unit	Location for Penalty Update Details
Section 206 (b), <i>Social Security Independence and Program Improvements Act of 1994</i> , P. L. 103-296, 108 Stat. 1509	Flagrant Violation (Section 1129 of the <i>Social Security Act</i> , 42 U.S.C. 1320a-8(a)(1))	1994	2022	01/15/2022	\$0-\$9,250	SSA/OIG	86 Federal Register 73839 (Dec. 2021)
Section 813 (c), <i>Bipartisan Budget Act of 2015</i> , P. L. 114-74, 129 Stat. 603	Flagrant Violation (Section 1129 of the <i>Social Security Act</i> , 42 U.S.C. 1320a-8(a)(1))	2015	2022	01/15/2022	\$0-\$8,723	SSA/OIG	86 Federal Register 73839 (Dec. 2021)
Section 428 (a), <i>Medicare Catastrophic Coverage Act of 1988</i> , P. L. 100-360, 102 Stat. 815	Flagrant Violation (Section 1140 of the <i>Social Security Act</i> , 42 U.S.C. 1320b-10(b)(1))	1988	2022	01/15/2022	\$0-\$11,506	SSA/OIG	86 Federal Register 73839 (Dec. 2021)
Section 428 (a), <i>Medicare Catastrophic Coverage Act of 1988</i> , P. L. 100-360, 102 Stat. 815	Flagrant Violation (Section 1140 of the <i>Social Security Act</i> , 42 U.S.C. 1320b-10(b)(2))	1988	2022	01/15/2022	\$0-\$57,527	SSA/OIG	86 Federal Register 73839 (Dec. 2021)



BIENNIAL REVIEW OF USER FEE CHARGES

SUMMARY OF FEES

In FY 2021 and FY 2022, we earned \$312 million and \$320 million in user fees, respectively. This revenue accounted for less than 1 percent of our total financing sources. We derive over 73 percent of user fee revenues from agreements with 20 States and the District of Columbia to administer some or all of the States’ supplemental SSI benefits. During FY 2022, we charged a fee of \$13.16 per payment for the cost of administering State supplemental SSI payments. This fee will increase to \$14.35 for FY 2023. We adjust the user fee annually based on the Consumer Price Index, unless the Commissioner of Social Security determines a different rate is appropriate for the States. We charge full cost for other reimbursable activity, such as earnings record requests from pension funds and individuals.

BIENNIAL REVIEW

The *Chief Financial Officers Act of 1990* requires biennial reviews by Federal agencies of agency fees and other charges imposed for services rendered to individuals as opposed to the American public in general. The objective of these reviews is to identify such activities, charge fees as permitted by law, and periodically adjust these fees to reflect current costs or market value. Based on our FY 2022 review, we identified updates to the uniform standard fee structure for non-programmatic workloads previously implemented in FY 2020. We are planning to perform another review of these fees during FY 2024.

GRANTS PROGRAMS

OMB Circular No. A-136, *Financial Reporting Requirements*, requires agencies to report on Federal grant and cooperative agreement awards that have not yet been closed out and for which the period of performance, including any extensions, elapsed for more than two years. As noted in the following table, we have one such grant or cooperative agreement to report.

The agency has six grant programs monitored by Grants Management Officers (GMO). Each GMO is responsible for monitoring a workload to ensure timely grant closeouts. Our grants have a five-year life-cycle and are sometimes extended at no additional cost. There may be years when little to no grants are available for closeout. Additionally, there are occasions when a GMO cannot immediately close a grant. That is the case with the grant listed below. The delay is the result of not having a final indirect rate agreement. In this instance, closeout could be delayed by one year. We have developed reports to adequately track closeout actions and have significantly reduced the number of open grants that are currently available for closeout from last year. We will continue to monitor this action and close the award as soon as it is eligible for closeout.

GRANTS AND COOPERATIVE AGREEMENTS SUMMARY

Category	2-3 Years	3-5 Years	More than 5 Years
Number of Grants/Cooperative Agreements with Zero Dollar Balances	0	Not Applicable	Not Applicable
Number of Grants/Cooperative Agreements with Undisbursed Balances	1	Not Applicable	Not Applicable
Total Amount of Undisbursed Balances	\$1,067,906	Not Applicable	Not Applicable



CLIMATE-RELATED FINANCIAL RISK

We are committed to climate adaptation and resilience planning to reduce climate change risks and develop any new opportunities that climate change may bring, where we can. Our [Climate Action Plan](#) (CAP) reaffirms our vision to improve our capacity to assess and build resilience to climate change risks. We also developed the [FY 2022 CAP Progress Report](#), which documents our progress on our planned efforts and initiatives to address climate change. Our CAPs, Sustainability Reports, and other climate and sustainability related reports are available on our Sustainability [website](#).

BUDGET, GOVERNANCE, STRATEGY, RISK MANAGEMENT, AND METRICS

The Office of the Chief Financial Officer (OCFO) leads our efforts to strategically plan actions to mitigate climate vulnerabilities and lessen climate-related financial risks at the agency. OCFO works closely with our Chief Sustainability Officer and other offices primarily involved in executing our sustainability and climate action programs.

In our CAP, we identify 5 priority adaptation areas of climate change at our delegated facilities, located in 4 of the 10 climate regions identified in the *National Climate Assessment Report*. These priority adaptation areas prepare us for power disruptions, increased flooding in coastal and non-coastal locations, reduced water supply, and disruptions and damage to transportation infrastructure. We collaborate with the General Services Administration on climate-related risk decision making for field office relocations in the event that an office must move (e.g., in the event of a flood) and to assist in monitoring flood plain areas, which may affect our delegated facilities and field offices.

Our financial risk exposure related to climate change mainly concerns the impact of energy usage to cool and heat our delegated sites. We budget for energy use and use previous usage to adjust for the upcoming year for our delegated sites. Within each of the five priority areas mentioned above, we face funding challenges if these events take place and affect our operations. These funding challenges include the loss or replacement of facilities, fleet, and IT equipment, as well as health and safety costs to keep operations active during severe climate-related events.

DEBT COLLECTION AND MANAGEMENT

DEBT COLLECTION

We have a robust debt collection program to recover all types of OPs, which helps ensure eligible individuals receive the benefits to which they are entitled, and it safeguards the integrity of benefit programs to better serve recipients. We use internal debt collection techniques (i.e., payment withholding and billing/follow-up), as well as external collection techniques authorized by the *Debt Collection Improvement Act of 1996* for OASDI debts and the *Foster Care Independence Act of 1999* for SSI debts.

In FY 2022, we recovered \$4.275 billion using both our internal and external collection tools. Over the last 5 years (FY 2018 through FY 2022), we have collected a total of \$20.162 billion. The following tables provide a description of each of our internal and external debt collection techniques for OASDI and SSI OPs, and a summary of the results.

INTERNAL COLLECTIONS

We utilize internal collection tools to recover payments of delinquent debt for individuals currently receiving payments. In FY 2022, we recovered \$4.268 billion using our internal collection tools, which accounted for about 99.8 percent of our total collections amount. Over the last 5 years (FY 2018 through FY 2022), we have collected a total of \$19.315 billion using our internal collection tools.



We offer individuals opportunities to ask us questions about their debts, request waivers in certain instances, and request alternative payment plans as needed. We have also been working on technological improvements to make it easier for recipients to repay debts.

The following table provides a description of each of our internal debt collection techniques for OASDI and SSI OPs, and a summary of the results.

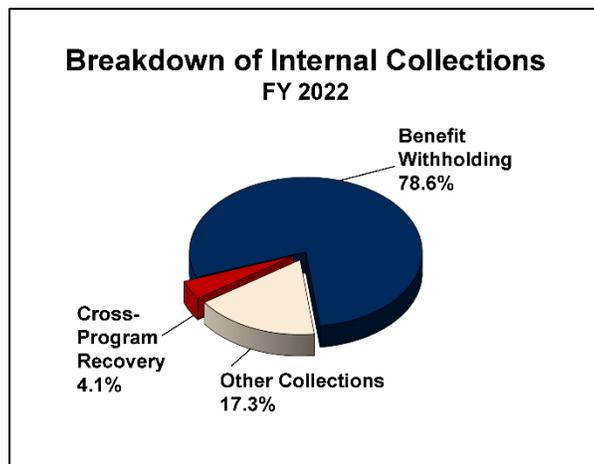
FY 2022 INTERNAL COLLECTIONS
(DOLLARS IN BILLIONS)

Recovery Method	Description	OASDI	SSI	Total
Benefit Withholding	We withhold some or all benefit payments for OASI and DI beneficiaries and SSI recipients currently receiving payments. Benefit withholding typically accounts for the largest recovery of our total collections amount.	\$2.428	\$0.926	\$3.354
Cross-Program Recovery (CPR)	CPR collects OASDI OPs from monthly SSI payments and UPs, and SSI OPs from monthly OASDI benefit payments and UPs.	\$0.023	\$0.150	\$0.174
Other Collections	These are mostly voluntary payments received because of a notice requesting a refund of an overpayment.	\$0.426	\$0.314	\$0.740
Total Internal Collections	The total amount recovered by utilizing our internal collection tools.	\$2.877	\$1.390	\$4.268

Notes:

- Totals do not necessarily equal the sum of rounded components.

The following chart highlights the allocation of OPs collected in FY 2022 through our various internal collection tools as a proportion of the total \$4.268 billion internal collections amount.





EXTERNAL COLLECTIONS

We utilize external collection tools to recover payments of delinquent debt for beneficiaries and recipients no longer receiving payments. In FY 2022, we recovered \$0.008 billion using our external collection tools, which accounted for less than 1 percent of our total collections amount. Over the last 5 years (FY 2018 through FY 2022), we have collected a total of \$0.838 billion using our external collection tools.

Due to the COVID-19 pandemic, in March 2020, we requested and received approval to suspend using the Treasury Offset Program (TOP). This suspension continued through FY 2022 and resulted in fewer collections through our external recovery methods.

The following table provides a description of each of our external debt collection techniques for OASDI and SSI OPs, and a summary of the results.

FY 2022 EXTERNAL COLLECTIONS (DOLLARS IN BILLIONS)

Recovery Method	Description	OASDI	SSI	Total
TOP	TOP allows us to collect delinquent debt by tax refund offset, administrative offset, and Federal salary offset.	\$0.000	\$0.000	\$0.000
Administrative Wage Garnishment (AWG)	AWG allows us to recover delinquent OASDI and SSI OPs by ordering a debtor's employer to garnish up to 15 percent of the debtor's private-sector disposable pay (i.e., that part of a worker's total compensation after deduction of health insurance premiums and required deductions).	\$0.006	\$0.002	\$0.008
Total External Collections	The total amount recovered by utilizing our external collection tools.	\$0.006	\$0.002	\$0.008

Notes:

1. Totals do not necessarily equal the sum of rounded components.
2. We use credit bureau reporting, non-entitled debtors, and automatic netting SSI as external collection tools. Collections derived from these recovery methods are subsets of the main recovery methods displayed in the table above. However, we track these collections for informational and decision-making purposes.



DEBT MANAGEMENT

The following two tables provide information on our debt management activities. We calculated the data shown in the tables by using accounts receivable amounts taken directly from the financial statements. We provide notes on activity that affected the change in accounts receivable activity between FY 2021 and FY 2022. We provide definitions of certain line items immediately following the Debt Management Activities Program and Administrative Table. For more information on our effort to curb OPs, please refer to the Payment Integrity section.

A Title II system design limitation prevents us from capturing and tracking long-term withholding agreements for debts owed by the public scheduled for collection beyond the year 2049. The Government Accountability Office noted this information in the July 2011 audit report entitled, “*Disability Insurance: SSA Can Improve Efforts to Detect, Prevent, and Recover Overpayments.*” Current policy allows for repayment periods based on the ability of beneficiaries to repay on a periodic basis. This allows for the establishment of payment terms, which may exceed the expected life span of the beneficiary as we often withhold minimal amounts to avoid imposing undue hardships. We recognize that a portion of this debt owed by the public will prove uncollectible because some plans exceed beneficiaries’ expected lifetimes. We estimate that approximately 62,500 debts owed by the public are affected by payment plans extending beyond December 31, 2049. We estimate the total gross value of the post year 2049 receivable amounts is approximately \$751 million as of September 30, 2022. This amount is not material to the consolidated financial statements. The 2049 data limitation in our debt management systems will no longer exist as we update and implement the new Debt Management System.

The following tables do not include the amounts related to post year 2049 debt. Therefore, the Total New Receivables and Total Write-offs are understated. We are working to address the system limitation; however, the accounts receivable balance reported on the financial statements are presented fairly in all material respects.

FY 2022 QUARTERLY DEBT MANAGEMENT ACTIVITIES PROGRAM AND ADMINISTRATIVE (DOLLARS IN MILLIONS)

	4th Quarter	3rd Quarter	2nd Quarter	1st Quarter
Total receivables	\$21,571	\$21,974	\$20,826	\$20,650
New receivables	8,582	6,745	3,801	1,786
Total collections	(4,665)	(3,321)	(2,253)	(1,179)
Adjustments	56	105	79	45
Total write-offs	(3,286)	(2,439)	(1,685)	(886)
- Waivers	(278)	(206)	(138)	(71)
- Terminations	(3,008)	(2,233)	(1,547)	(815)
Aging schedule of debts:				
- Non delinquent debt	15,232	15,727	14,645	14,324
- Delinquent debt				
- 120 days or less	1,015	957	907	1,119
- 121 days to 10 years	4,159	4,153	4,165	4,126
- Over 10 years	1,165	1,137	1,109	1,081
- Total delinquent debt	\$6,339	\$6,247	\$6,181	6,326



**DEBT MANAGEMENT ACTIVITIES
PROGRAM AND ADMINISTRATIVE
(DOLLARS IN MILLIONS)**

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Total receivables	\$21,571	\$20,884	\$24,398	\$25,834	\$24,484
New receivables¹	8,582	9,061	6,332	7,899	7,943
Total collections	(4,665)	(4,517)	(4,100)	(4,215)	(3,992)
Adjustments	56	(617)	(1,129)	(1,431)	(1,333)
Total write-offs²	(3,286)	(7,441)	(2,539)	(903)	(778)
- Waivers	(278)	(281)	(260)	(390)	(329)
- Terminations	(3,008)	(7,160)	(2,279)	(513)	(449)
Non delinquent debt	15,232	14,833	14,263	14,445	14,272
Total delinquent debt	\$6,339	\$6,051	\$10,135	\$11,389	\$10,212
<u>Percentage Analysis</u>					
% of outstanding debt:					
- Non delinquent	70.6%	71.0%	58.5%	55.9%	58.3%
- Delinquent	29.4%	29.0%	41.5%	44.1%	41.7%
% of debt estimated to be uncollectible³	57.3%	56.3%	59.2%	45.7%	43.5%
% of debt collected	21.6%	21.6%	16.8%	16.3%	16.3%
% change in collections from prior fiscal year	3.3%	10.2%	-2.7%	5.6%	2.7%
% change in delinquencies from prior fiscal year	4.8%	-40.3%	-11.0%	11.5%	13.3%
Clearances as a % of total receivables	36.9%	57.3%	27.2%	19.8%	19.5%
- Collections as a % of clearances	58.7%	37.8%	61.8%	82.4%	83.7%
- Write-offs as a % of clearances	41.3%	62.2%	38.2%	17.6%	16.3%
<u>Other Analysis</u>					
Cost to collect \$1	\$0.06	\$0.07	\$0.06	\$0.06	\$0.07
Average number of months to clear receivables⁴:					
- OASI	12	13	16	16	16
- DI	30	27	68	45	45
- SSI	45	48	66	49	43

Notes:

1. Total Write-offs/Terminations – Starting in FY 2020, we re-evaluated our program debt portfolio, specifically delinquent and uncollectible debt. We found that we were pursuing debt that was largely uncollectible, thereby inefficiently using our processing centers’ limited resources. As a result, we wrote off a portion of our OASI and DI debt during FY 2020 and FY 2021 and wrote off a portion of our SSI program debt in FY 2021. In FY 2021, we developed an automated process to evaluate debt for potential write-offs, which contributed to the write-off values in FY 2021 and FY 2022. The difference between FY 2021 and FY 2020 is primarily the targeted OASI, DI, and SSI write-offs in FY 2021, as both years have incurred write-offs as part of the automated process. By terminating collection activity on uncollectible debt, we are better reflecting current receivables on our financial statements as well as reducing the number of actions from the processing center pending backlog. Please note while this debt is being written-off, it remains available for future collection. We can pursue collection efforts if the debtor becomes entitled to OASDI or SSI benefits. In addition, if eligible, we will refer these delinquent debts to TOP for external collection action. We did not refer any delinquent debts to TOP in FY 2022. (See Termination definition below).
2. Percentage of Debt Estimated to be Uncollected – Our allowance for doubtful accounts methodology allows for all delinquent debt two years or older at 100 percent. For remaining debt that is not delinquent two years or more, we apply our uncollectible ratios, consistent with previous years. We add the fully allowed delinquent debt two years and older value to the calculated uncollectible value on the remaining debt to calculate the total allowance for doubtful accounts.
3. Refer to Note 1, Summary of Signification Accounting Policies, and Note 6, Accounts Receivable, Net, in the *Financial Statements and Additional Information* section for more information.



Definitions:

1. Adjustments – Program debt adjustments represent: (a) written-off debts, by way of terminations, that we reinstate for collections; (b) changes in debts when we update debtor accounts with new information; and (c) minor differences between reports containing debt information that we use to maintain an ending accounts receivable balance.
2. Waivers – Waivers represent the amount of overpayments forgiven because the overpaid person: (a) is without fault in causing the debt; and (b) recovery would either defeat the purpose of the *Social Security Act* or be against equity and good conscience. Waivers permanently remove debts from our accounts receivable balance, which precludes any further collection efforts.
3. Terminations – Terminations represent our decision to cease our own efforts to collect a debt because: (a) the debtor will not repay the debt or alleges they cannot pay the debt; (b) we cannot locate the debtor after diligent search; or (c) the debt is at least two years delinquent. Even though we terminate internal active collection, we may still use external collection efforts such as the TOP and AWG. If the debtor becomes entitled to OASDI benefits or eligible for SSI payments, we reinstate the debt and resume recovery through benefit/payment withholding.
4. Delinquent Debt – A debt is delinquent when no voluntary payment has been made 30 days after the latest of the following: (a) the date we establish an OASDI debt; (b) the date of the initial overpayment notice for an SSI debt; (c) the date of the last voluntary payment; (d) the date of an installment or periodic payment arrangement (if we do not receive a payment); and (e) the date we decide a debtor remains responsible for a debt, in response to a due process action by the debtor.



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