

**Annual Report on the Results of Periodic
Representative Payee Site Reviews
and Other Reviews**



Social Security Administration

Fiscal Year 2022

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Annual Report on the Results of Periodic Representative Payee Site Reviews and Other Reviews

October 1, 2021, through September 30, 2022

Background

The Social Security Act requires the Social Security Administration (SSA) to report the results of site reviews of specific types of representative payees (payee) and any other reviews of payees conducted during the prior fiscal year (FY).¹ This report provides the results of the reviews of payees who manage the benefits of Social Security, Special Veterans Benefits, and Supplemental Security Income (SSI) beneficiaries. This FY 2022 report is our 19th annual report.

This report includes a description of review findings, corrective actions, and the following additional information:

1. Number of reviews
2. Results of the reviews
3. Number of cases in which the payee was changed and why
4. Number of reviews conducted in response to allegations or concerns about the performance or suitability of the payee
5. Number of cases in which there was a misuse of funds
6. Total dollar amount of benefits determined to have been misused by a representative payee
7. Number of cases in which misuse of funds resulted from the negligent failure of SSA to investigate or monitor a representative payee
8. Final disposition of misuse cases, including any criminal, civil or administrative penalties imposed, the total dollar amount of misused benefits repaid to beneficiaries, and the total dollar amount of misused benefits repaid and recovered
9. Updates to prior years' report(s) necessary to reflect recoveries and repayments pertaining to misuse determinations in prior years
10. Other information, as deemed appropriate

We presume that a legally competent adult beneficiary is capable of managing or directing someone else to manage their benefits unless there are indicators or evidence to the contrary. We pay legally incompetent adult beneficiaries and most children under age 18 through a payee. A payee is a third party who manages the benefits of a beneficiary to meet the beneficiary's needs such as food, clothing, shelter, medical care, and personal comfort items. After meeting the beneficiaries' current and reasonably foreseeable needs, the payee must conserve or invest any remaining Social Security benefits for the beneficiary's future use.

In all payee selections, our primary concern is the beneficiary's best interest. Our policies reflect our commitment to ensuring that payees use benefits to promote the physical, mental, and emotional well-being of beneficiaries in a manner that preserves the dignity and protects the

¹ Sections 205(j)(12), 807(k)(2), and 1631(a)(2)(G)(ii) of the Act, 42 U.S.C. §§ 405(j)(12), 1007(k)(2), and 1383(a)(2)(G)(ii). Section 105(a) of the SPSSBA amended section 205(j) of the Act, 42 U.S.C. § 405(j).

basic rights of our beneficiaries. Most payees carefully and compassionately provide much-needed help to beneficiaries on a volunteer basis.

There are approximately 5.6 million payees serving 7.8 million beneficiaries.² Payees manage \$72.9 billion in annual benefits. Fifty-two percent of the beneficiaries with payees are minor children. The payee program relies heavily upon family relationships. Family members, primarily parents or spouses, serve 85.6 percent of the beneficiaries who have payees.³

We allow capable applicants and beneficiaries to designate up to three people to serve as their representative payee should the need arise. In FY 2022, approximately 1.7 million people designated someone. If we determine that a beneficiary needs a payee, we use their advance designee list as the first lead in developing for potential payees. Designees must be willing to serve and apply to be payee, and as with other applicants, we determine whether designees are suitable before appointing them. We issue annual notices to beneficiaries with the information we have on record regarding their designees, and beneficiaries can modify, update, or withdraw their advance designation at any time.

In general, when a beneficiary does not have a relative, legal guardian, or close friend suitable to serve as payee, we may appoint an organizational payee. There are 30,734 organizational payees, less than one percent of all payees, serving approximately 819,138 beneficiaries. Of these organizational payees, 1,258 are fee-for-service (FFS) payees authorized to collect a fee for providing payee services. Fee-for-service payees serve approximately 198,191 beneficiaries.⁴

Our responsibility does not end when we appoint a payee. We monitor payees through our annual accounting and site review processes to ensure they remain suitable and appropriately manage benefits on behalf of the beneficiary.

We require certain payees to account annually for how they used the benefits they received. Section 102 of the Strengthening Protections for Social Security Beneficiaries Act (SPSSBA) of 2018 exempts parents of minor children in their custody and of disabled individuals who primarily reside in the same household, legal guardians of children who primarily reside in the same household, as well as spouses, from this annual payee accounting process. Certain State mental institutions are also exempt from annual payee accounting, as discussed on page 4 of this report.

From October 2020 through September 2021, we mailed 3,448,173 accounting reports. Of the reports mailed, 2,346,687 were initial accounting requests and 1,101,486 were follow-up requests mailed to representative payees who did not reply to an initial request. During FY 2021, approximately 436,505 payees (about 12.7 percent) failed to complete the accounting forms in a timely manner.⁵ If a payee does not respond to our requests for an accounting report, the appropriate field office (FO) makes all reasonable attempts to contact the payee; this could

² Electronic Representative Payee System (eRPS) – September 23, 2022. In the FY 2018 and prior reports, these figures included beneficiaries who received their benefits directly but previously had a representative payee. We started excluding these categories in the FY 2019 and later reports. This figure may be lower than in prior reports.

³ Office of Research, Evaluation & Statistics (ORES) – December 2021.

⁴ Data Source: eRPS – September 23, 2022

⁵ Data Source: All accounting report data derived from Representative Payee Accounting Database. As with previous reports, accounting data covers the prior fiscal year.

include redirecting payments to the FO as our final attempt to ensure the beneficiary has access to their benefits. Once we make contact, we advise the payee of the importance of this annual accounting, secure a completed accounting report, and determine if the payee remains suitable or if we should find a new payee, or pay the beneficiary directly.

In addition to the annual accounting process, we monitor payees' fiduciary performance through site reviews. Site reviews protect beneficiaries from misuse of benefits and help ensure these payees carry out their duties and responsibilities in compliance with our policies and procedures. State Protection and Advocacy (P&A) organizations receive grants for performing site reviews on behalf of SSA under Section 101 of the SPSSBA, and they report their review findings to SSA. We immediately investigate any indications of misuse of funds or poor performance by a payee and take all appropriate actions to protect the beneficiary's best interests.

The COVID-19 pandemic presented significant challenges to completing site reviews. In response, we revised our business processes to allow the P&As to use phone interviews and video conferences to complete site reviews. We will continue to monitor these processes to ensure that they remain effective and necessary.

Type of Payees⁶

Below we define the different payee types:

1. **Organizational Volume Payee:** An organization serving 50 or more beneficiaries. This category of payee does not include FFS payees or certain State mental institutions. We review volume payees every four years. See sections 205(j)(6)(iii) and 1631(a)(2)(G)(i)(III) of the Act. Examples of payees included in this category are State and local social service agencies, private non-profit social service agencies, and nursing homes.
2. **State Mental Institutions:** A State-operated psychiatric hospital providing care and treatment. As of October 2022, 199 State mental institutions participate in our onsite review program established under sections 205(j)(3)(B) and 1631(a)(2)(C)(ii) of the Act.⁷ These sections of the statute do not require participating State mental institutions to provide an annual accounting form for each of the beneficiaries they serve. Instead, we conduct a site review of each institution at least once every three years. Institutions deciding not to participate in this onsite review program must complete annual accounting forms for each beneficiary they serve and are still subject to periodic site reviews. (See “State Onsite Reviews” in the section titled “Type of Payee Reviews.”)
3. **FFS Payee:** A State or local government agency or a certified community-based nonprofit social service organization we authorize to collect a fee for payee services. The agency or organization must regularly serve five or more beneficiaries. We review FFS payees every three years. See sections 205(j)(4), 205(j)(6)(ii), 1631(a)(2)(D), and 1631(a)(2)(G)(i)(II) of the Act.
4. **Other Organizational Payee:** Government agencies, and organizations, other than those described above, serving 49 or fewer beneficiaries. We use a predictive model to select organizations for review. The model selects payees for review based on payee and beneficiary characteristics that indicate a higher likelihood of potential misuse.
5. **Individual Volume Payee:** An individual who serves 15 or more beneficiaries. We review individual volume payees every four years, similar to organizational volume payees. See sections 205(j)(6)(iii) and 1631(a)(2)(G)(i)(III) of the Act. Examples of payees in this category include individual community advocates who work in conjunction with local agencies, or individuals who offer guardianship services.
6. **Individual Family Payee:** An individual who serves 14 or fewer beneficiaries and is a relative. We use a predictive model to select individual non-volume family payees serving 14 or fewer beneficiaries for review. The model selects payees for review based on payee and beneficiary characteristics that indicate a higher likelihood of potential misuse. See sections 205(j)(6)(i) and 1631(a)(2)(G)(i)(I) of the Act.

⁶ In the FY 2018 and prior reports, the “Individual Payee” type had comprised counts for the subtypes of “Individual Volume,” “Individual Family,” and “Individual Non-Family” payees. In the FY 2019 and later reports, we provide counts for these as separate types to comply with the requirements of the SPSSBA.

⁷ Data Source: Number of State mental institutions taken from Representative Payee Monitoring Tool (RPMT).

7. **Individual Non-Family Payee:** An individual who serves 14 or fewer beneficiaries and is a non-relative. We use a predictive model to select individual non-volume family payees serving 14 or fewer beneficiaries for review. The model selects payees for review based on payee and beneficiary characteristics that indicate a higher likelihood of potential misuse. See sections 205(j)(6)(i) and 1631(a)(2)(G)(i)(I) of the Act. Examples of payees in this category could be a friend, an unrelated guardian, or an unrelated volunteer payee.

Types of Payee Reviews

Below we define our payee reviews. We also report the results of our reviews and the findings of the reviews. Please see *Appendix A*, which provides detailed descriptions of some of these findings.

1. **Periodic Site Review:** At least once every 3 or 4 years, we monitor the performance of individual volume payees, organizational volume payees, and FFS payees, through a face-to-face meeting with the payee and an examination of the payee's records. We assess the payee's recordkeeping and interview beneficiaries. We complete these reviews according to sections 205(j)(6) and 1631(a)(2)(G)(i) of the Act.
2. **Targeted Review:** A targeted review is a site review conducted in response to an event that raises a question about the payee's performance or suitability. To initiate a targeted review, the event must meet certain criteria. Examples of events that may trigger a targeted review include allegations of misuse or improper use of benefits from a beneficiary or third party, reports of employee theft, adverse media coverage, and an investigation of the payee by another governmental agency. We categorize targeted reviews according to who initiated the review. A targeted review initiated by SSA staff is a Quick Response Check, while a targeted review initiated by a P&A grantee is a P&A Initiated Review.
3. **Educational (Edu.) Visit:** We visit all new FFS payees six months after appointment. The purpose of Edu. visits is to ensure the payees fully understand their responsibilities and are capable of recordkeeping and reporting. We may also conduct Edu. visits to any type of payee at any time. For example, we may make an Edu. visit to a volume payee if we learn the payee had changes in key personnel or we needed to evaluate their recordkeeping practices.
4. **State Onsite Reviews:** We conduct onsite reviews at least once every three years to evaluate the fiduciary performance of State mental institutions serving as payees for our beneficiaries, pursuant to sections 205(j)(3)(B) and 1631(a)(2)(C)(ii) of the Act. P&A grantees go to the institution to conduct financial accountings and to observe and visit the beneficiaries served by the institution.
5. **Predictive Model Reviews:** We use a predictive model to select organizational payees serving 49 or fewer beneficiaries and individual payees serving 14 or fewer beneficiaries for review. This model selects organizational and individual payees based on payee and beneficiary characteristics that indicate a higher likelihood of potential misuse.

Results of Our Reviews

Section 101 of the SPSSBA transformed our site review process. Instead of our staff completing these reviews, state P&A organizations complete the reviews on our behalf and report their findings to us. We implemented this new site review process in FY 2019, which includes awarding grants to the P&A grantees, training the grantees, and developing new business processes, systems, and security protocols for the grantees.

All P&A site reviews included the examination of the payee's financial records and supporting documentation as well as beneficiary's living conditions. P&A grantees develop and implement corrective action plans to ensure payees remedy fiduciary findings, such as incorrect titling of bank accounts, recordkeeping findings, and overdue accounting reports. P&A grantees conducted 3,617 payee site reviews in FY 2022 and notified us of possible misuse, payee suitability, and other sensitive findings. In addition, P&A grantees made referrals to outside agencies for immediate health and safety threats, financial exploitation, and other identified beneficiary needs.

Although this report covers reviews conducted in FY 2022, some reviews and corrective actions span multiple years. For example, a payee reviewed late in the year may not have finished correcting the titles on payee bank accounts by the end of the FY, or we may need several months to review records in a case of widespread misuse.

Table 1 provides the total number of reviews performed by type of review and payee category. We included a detailed description of the findings discovered throughout the review process and the corrective actions taken in *Appendix A*.

Tables 2-6 describe findings identified during the different types of reviews.⁸ If a particular payee type is excluded from a table, there were no site reviews of that category conducted for that payee type.

⁸ Data from tables 1-6 derived using our RPMT. In FY 2019, deficiency categories may have represented multiple errors by the same payee from a single review, resulting in more deficiencies than reviews. Beginning in FY 2020 we only count one deficiency per review, even if multiple instances of the same deficiency occur.

Table 1: Number of Reviews by Review Type and Payee Type

	Review Types					
Payee Types	Periodic	Targeted	Edu. Visits	State Onsite	Predictive Model	Total
Organizational Volume Payees	714	47	0	0	0	761
State Mental Institutions	0	0	0	107	0	107
Fee For Service Payees	431	17	38	0	0	486
Other Organizational Payees	0	136	1	0	1,486	1,623
Individual Volume Payee	115	43	0	0	0	158
Individual Family Payee	2	54	0	0	340	396
Individual Non-Family Payee	0	35	0	0	51	86
Total	1,262	332	39	107	1,877	3,617

Table 2: Findings Identified During 1,262 Periodic Site Reviews by Payee Type

	Payee Types			
Findings	Org. Volume	FFS	Indiv. Volume	Total
Over SSI Resource Limit	195	110	22	327
Failure to Report Changes	175	140	46	361
Recordkeeping Findings (e.g., minor math errors, weak internal controls)	327	200	61	588
Potential Payee Suitability Finding – Financial	352	218	64	634
Potential Payee Suitability Issue – Non-Financial	89	104	25	218
Bank Account Issues	328	171	51	550
Annual Accounting Forms Not Returned	196	86	11	293
Same Deficiencies from Previous Reviews Found	63	60	16	139
Dedicated Account Funds Misapplied	0	1	1	2
Payee Did Not Exercise Oversight of Benefits (Conduit Payee)	28	34	17	79
Total	1,753	1,124	314	3,191

Table 3: Findings Identified During 332 Targeted Reviews by Payee Type

	Payee Types						
Findings	Org. Volume	FFS	Other Org.	Indiv. Volume	Indiv. Family	Indiv. Non-Family	Total
Over SSI Resource Limit	14	7	21	8	4	2	56
Failure to Report Changes	20	8	32	22	19	10	111
Recordkeeping Findings (e.g., minor math errors, weak internal controls)	23	12	106	24	40	26	231
Potential Payee Suitability Issue – Financial	26	13	86	29	29	17	200
Potential Payee Suitability Issue – Non-Financial	10	10	23	15	13	9	80
Bank Account Issues	25	11	81	22	23	19	181
Annual Accounting Forms Not Returned	10	1	24	5	3	4	47
Same Deficiencies from Previous Reviews Found	6	8	10	3	0	0	27
Dedicated Account Funds Misapplied	0	0	0	0	0	0	0
Payee Did Not Exercise Oversight of Benefits (Conduit Payee)	1	2	8	3	6	4	24
Total	135	72	391	131	137	91	957

Table 4: Findings Identified During 39 Educational Visits by Payee Type

	Payee Types			
Findings	Org. Volume	FFS	Other Org.	Total
Over SSI Resource Limit	0	5	0	5
Failure to Report Changes	0	5	0	5
Recordkeeping Findings (e.g., minor math errors, weak internal controls)	0	17	0	17
Potential Payee Suitability Issue – Financial	0	18	0	18
Potential Payee Suitability Issue – Non-Financial	0	3	0	3
Bank Account Issues	0	14	0	14
Annual Accounting Forms Not Returned	0	4	0	4
Same Deficiencies from Previous Reviews Found	0	3	0	3
Dedicated Account Funds Misapplied	0	0	0	0
Payee Did Not Exercise Oversight of Benefits (Conduit Payee)	0	3	0	3
Total	0	72	0	72

Table 5: Findings Identified During 107 State Onsite Reviews

Findings	State Mental Institutions Total
Over SSI Resource Limit	9
Failure to Report Changes	3
Recordkeeping Findings (e.g., minor math errors, weak internal controls)	16
Potential Payee Suitability Issue – Financial	17
Potential Payee Suitability Issue – Non-Financial	1
Bank Account Issues	2
Annual Accounting Forms Not Returned	0
Same Deficiencies from Previous Reviews Found	2
Dedicated Account Funds Misapplied	0
Payee Did Not Exercise Oversight of Benefits (Conduit Payee)	1
Total	51

Table 6: Findings Identified During 1,877 Predictive Model Reviews by Payee Type

	Payee Types			
Findings	Other Org.	Indiv. Family	Indiv. Non-Family	Total
Over SSI Resource Limit	375	4	0	379
Failure to Report Changes	462	67	12	541
Recordkeeping Findings (e.g., minor math errors, weak internal controls)	1,006	294	43	1,343
Potential Payee Suitability Issue – Financial	905	107	17	1,029
Potential Payee Suitability Issue – Non-Financial	331	30	8	369
Bank Account Issues	1,026	106	17	1,149
Annual Accounting Forms Not Returned	325	16	4	345
Same Deficiencies from Previous Reviews Found	76	3	0	79
Dedicated Account Funds Misapplied	0	3	0	3
Payee Did Not Exercise Oversight of Benefits (Conduit Payee)	77	18	7	102
Total	4,583	648	108	5,339

Outside Agency Referrals

If the reviewers observed certain situations affecting the beneficiary's well-being, they made a referral to the appropriate agency. **Table 7** provides the counts for outside agency referrals for all review types. We include a detailed description of these referrals in *Appendix B*.

Table 7: Outside Agency Referrals Resulting from All Review Types

Referrals	Total
Immediate health or safety threat to the beneficiary	80
Possible financial exploitation	16
Beneficiary identified needs	1,663
Total	1,759

Change of Payee Situations

When the payee under review was determined unsuitable to continue serving in this role, we removed them. In these instances, the FO conducted a capability determination to evaluate each affected beneficiaries continued need for a payee. Based on the results of the capability determinations, the FO initiated direct payment to beneficiaries determined to be capable and assigned a new payee to beneficiaries deemed incapable. **Table 8** provides the reasons for payee changes resulting from all onsite reviews. For additional information on payee changes involving misuse cases, see the *Findings of Misuse* section, page 15.

Table 8: Payee Change Reasons for All Review Types⁹

	Payee Types							
Change Reasons	Org. Volume	State Mental Inst.	FFS	Other Org.	Indiv. Volume	Indiv. Family	Indiv. Non-Family	Total
Business Closed/Sold	2	0	2	4	0	0	0	8
Payee Uncooperative	0	0	0	2	0	1	2	5
Payee Withdrew	0	0	1	2	0	1	1	5
Poor Performance	0	0	1	8	1	7	3	20
Misuse Investigation	0	0	1	5	0	4	2	12
Total	2	0	5	21	1	13	8	50

⁹ RPMT. We derived payee changes due to misuse investigations or misuse findings from FY 2022 regional misuse reports based on completed site reviews that had a concurrent misuse investigation. Those changes were a result of either a completed misuse determination in FY 2022, or by identifying poor payee performance during FY 2022.

Findings of Misuse

Misuse allegations come in many forms, including self-reporting by the payee, adverse media reports, referrals from state P&A grantees or other agencies and law enforcement, and allegations made directly by beneficiaries or members of the public. Although we can discover misuse at any site review, we often initiate targeted site reviews from misuse allegations.

For allegations of misuse, we review the financial records of all beneficiaries served by the payee during the period of misuse, make a final misuse determination, share our findings with the Office of the Inspector General (OIG) for potential criminal investigation, and complete administrative actions such as recovery and repayment of misused funds. It may take months to several years until the case reaches final resolution, depending on the complexity of the allegation and OIG's criminal investigation. We retain a payee *only* if the payee continues to be suitable *and* makes restitution or has a definite plan to make restitution. An example would be an isolated instance of employee theft by an employee of an otherwise well-performing organization.

We carried 163 pending cases of misuse over from the last year's report. Our FY 2022 reviews found that most payees used beneficiaries' funds properly. Out of 3,617 completed reviews, we initiated new misuse investigations on only 63 cases. By the end of FY 2022, we closed 48 cases with all actions complete and 178 cases remained pending further misuse development.

In FY 2022, we made misuse determinations on 54 pending cases and referred them to the OIG for review. Of the 54 cases, 36 were organizational payees and 18 were individual payees. We removed the payee in 29 cases and retained the payee in 25 cases. For the 49 closed cases, 41 were initiated in prior fiscal years and 8 were initiated in FY 2022. We removed the payee in 37 cases and retained the payee in 12 cases. Ultimately, we finalized misuse determinations totaling \$1,604,918.10. We also repaid or reissued \$3,328,522.99 of misused funds to affected beneficiaries. We recovered \$638,006.07 from payees and wrote off \$2,383.62 as uncollectable under our policy.¹⁰ The recovery and repayment totals include recoveries and repayments from prior years' misuse determinations.

Tables 9-10 provide data that breaks down all suspected misuse referrals and those only related to charging fees from the P&A reviewers to SSA by review and payee type.

Table 11 provides a summary of site review misuse cases including total new, completed, and pending cases, as well as dollar amounts for misuse found, repayment, and recovery actions.

Tables 12-13 display new misuse cases by review and payee type, and final misuse determinations by payee type only since we completed many of those reviews in prior years.

Pages 19 - 58 of this report contain narratives that describe misuse identified during FY 2022 site reviews along with updates on misuse identified in prior fiscal years that are still pending.¹¹

¹⁰ All misuse dollar amounts derived from FY 2022 regional misuse reports of determinations, repayments, reissuances, and recoveries.

¹¹ All misuse narratives derived from annual regional misuse reports and OIG status updates. A case is resolved when we recover all misused funds or exhaust all recovery options (both internal and external collection methods).

Each misuse narrative details the circumstance surrounding the misuse allegation, whether the misuse investigation is ongoing or complete, whether we retained or removed the payee, and whether the case has yet been referred to OIG.

For individual payees who served 14 or fewer beneficiaries at the time misuse occurred, SSA is required to make a negligence determination. This determination is necessary to document whether SSA followed established procedures to investigate and monitor the payee and if SSA will repay the misused benefits pending payee restitution. On cases where SSA is found negligent, reimbursement of the misused funds to affected beneficiaries is not delayed pending recovery from the payee. For these cases, we indicate that we repaid the beneficiary while recovery from the payee is outstanding. SSA is required to repay benefits on all misuse cases involving organizational payees or individual payees who served more than 14 beneficiaries at the time misuse occurred. Where SSA is not negligent, reimbursement of the misuse funds to affected beneficiaries occurs as we recover those funds from the payee.

On cases where we made a final determination of the misuse that occurred, we annotate in the narrative the amount of misuse, the amount that has been repaid to the affected beneficiaries, and the amount that has been recovered from the payee. In cases that involved federal prosecution we also annotate criminal and civil penalties. Recovery efforts may be prolonged against payees who have closed or are no longer serving as payee. We also establish debt records to collect future benefits from individual payees who do not cooperate with the repayment process.

Table 9: Site Review Total Suspected Misuse¹²

	Review Types					
Payee Types	Periodic	Targeted	Edu. Visits	State Onsite	Predictive Model	Total
Org. Volume	24	3	0	0	0	27
State Mental Institutions	0	0	0	1	0	1
FFS	21	3	0	0	0	24
Other Org.	0	8	0	0	75	83
Indiv. Volume	6	5	0	0	0	11
Indiv. Family	0	12	0	0	11	23
Indiv. Non-Family	0	7	0	0	3	10
Total	51	38	0	1	89	179

¹² RPMT – Table 9 shows all new instances of suspected misuse based on site review findings. There can be multiple instances of suspected misuse for a single site review, and some result with no misuse being found. The report narratives contain pending and complete misuse found investigations only. Table 10 contains the same findings related only to incorrect or unauthorized fees. The P&As refer these findings to SSA for evaluation and appropriate action.

Table 10: Site Review Suspected Misuse Related to Charging Fees

	Review Types					
Payee Types	Periodic	Targeted	Edu. Visits	State Onsite	Predictive Model	Total
Org. Volume	0	2	0	0	0	2
State Mental Institutions	0	0	0	0	0	0
FFS	11	1	0	0	0	12
Other Org.	0	1	0	0	6	7
Indiv. Volume	4	4	0	0	0	8
Indiv. Family	0	0	0	0	0	0
Indiv. Non-Family	0	0	0	0	0	0
Total	15	8	0	0	6	29

Table 11: Site Review Misuse Summary¹³

Category	Total
Site Review Total Suspected Misuse	179
Site Review Suspected Misuse Related to Charging Fees	29
New Misuse Investigations from Suspected Misuse	63
Misuse Found Determinations ¹⁴	54
Misuse Unfounded or Not Found Determinations	20
Total Dollars of Misuse Found	\$1,508,053.04
Total Dollars Recovered from Payees ¹⁵	\$542,081.01
Total Dollars Repaid or Reissued to Affected Beneficiaries	\$3,232,597.93

¹³ Data on Tables 11, 12 and 13 derived from FY 2022 regional misuse reports.

¹⁴ Total includes completed misuse determinations in FY 2022 regardless of the year we initiated an investigation.

¹⁵ Total includes funds recovered in FY 2022 toward misuse determinations finalized in FY 2022 and those finalized in prior fiscal years but still in recovery.

Table 12: New Misuse Investigations by Review and Payee Type¹⁶

	Review Types					
Payee Types	Periodic	Targeted	Edu. Visits	State Onsite	Predictive Model	Total
Org. Volume	8	1	0	0	0	9
State Mental Institutions	0	0	0	1	0	1
FFS	8	0	1	0	0	9
Other Org.	0	5	0	0	24	29
Indiv. Volume	1	3	0	0	0	4
Indiv. Family	0	9	0	0	1	10
Indiv. Non-Family	0	1	0	0	0	1
Total	17	19	1	1	25	63

Table 13: Misuse Found Determinations by Payee Type¹⁷

	Payee Types							
Misuse Found	Org. Volume	State Mental Inst.	FFS	Other Org.	Indiv. Volume	Indiv. Family	Indiv. Non-Family	Total
Total	13	0	7	16	3	12	3	54

¹⁶ New misuse investigations associated with site reviews conducted in FY 2022. See *Table 1* on page 8

¹⁷ Totals include misuse found determinations closed in FY 2022 regardless of the year we initiated an investigation.

FY 2022 New Misuse Allegations

(b) (7)(A) (b) (7)(A)

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Catholic Charities, Amityville, NY. During the site review, the payee reported a prior instance of employee theft. The payee terminated the responsible employee. We initiated a misuse investigation to look further into the situation. We made a final misuse determination of \$17,480 affecting seven beneficiaries. The payee repaid the full amount to affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination, and all case actions are complete.

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Chinle Valley School for Exceptional Children, Chinle, AZ. During the site review, we discovered an isolated instance of employee theft. We made a final misuse determination of \$3,008 affecting one beneficiary. The payee repaid the full amount to affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination, and all case actions are complete.

Community Mainstreaming Association, Westbury, NY. During the site review, we discovered a small instance of employee theft. We made a final misuse determination of \$40 affecting one beneficiary. The payee repaid the full amount to the affected beneficiary. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination, and all case actions are complete.

Community Options, Nashville, TN. During the site review, the payee disclosed there was an incidence of employee theft that occurred in 2017. The organization reported it to authorities, terminated the employee in question, and completed an internal investigation. We conducted a misuse investigation and concurred with the loss identified by the organization. We made a final misuse determination of \$51,891 affecting 22 beneficiaries. The payee repaid the full amount to affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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Good Neighbor Homes, Richmond, VA. During the site review, we discovered that this payee potentially used beneficiary to purchase things that were not for the beneficiary. We made a final misuse determination of \$969 affecting one beneficiary. The payee repaid the full amount of misused funds to the beneficiary. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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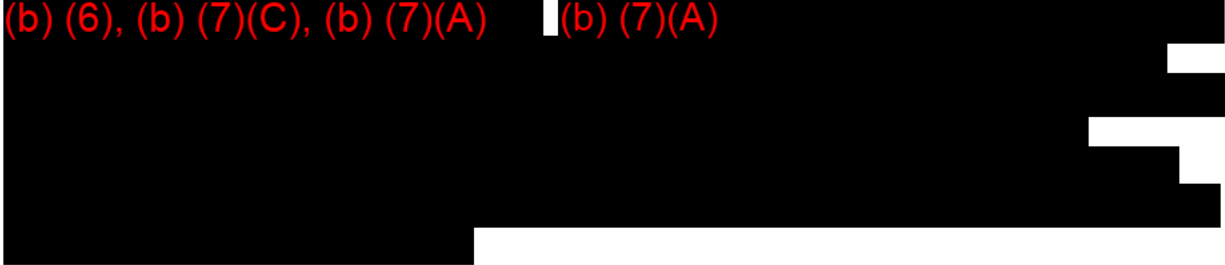
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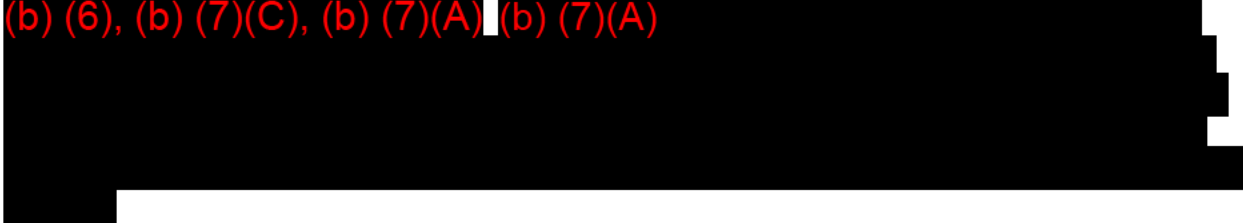
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(b) (6), (b) (7)(C), (b) (7)(A) [REDACTED] (b) (7)(A) [REDACTED]

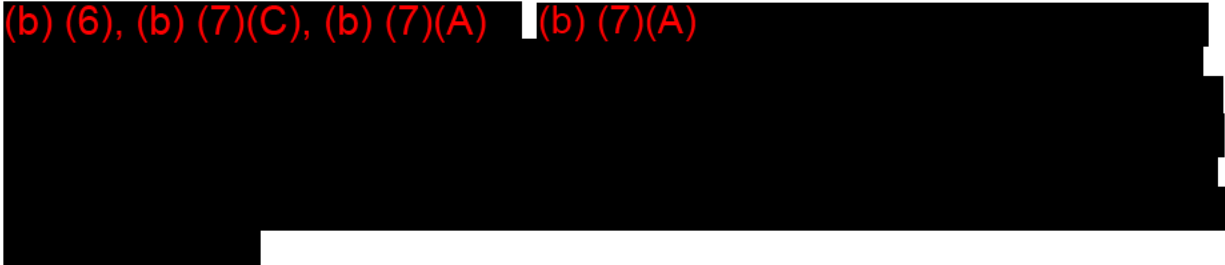
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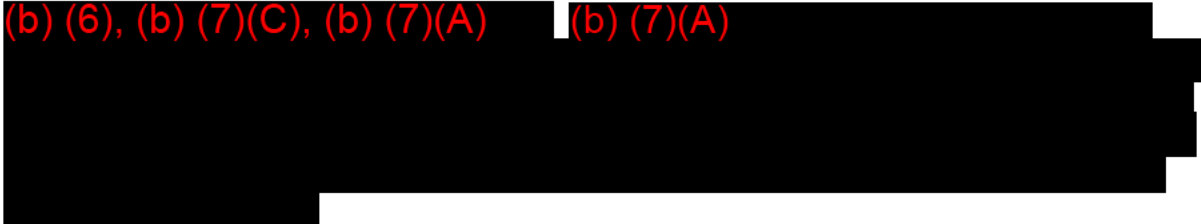
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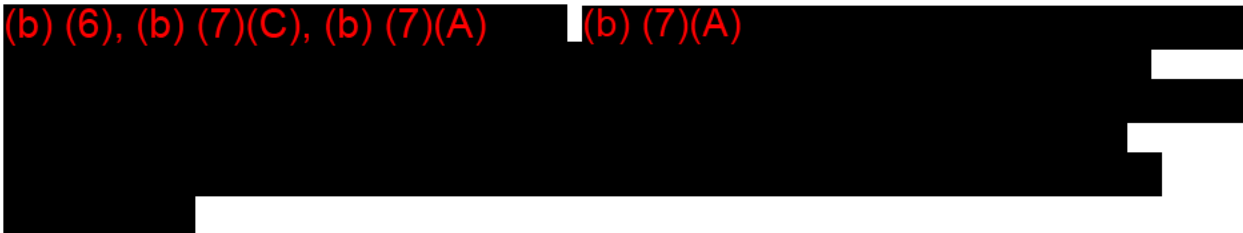
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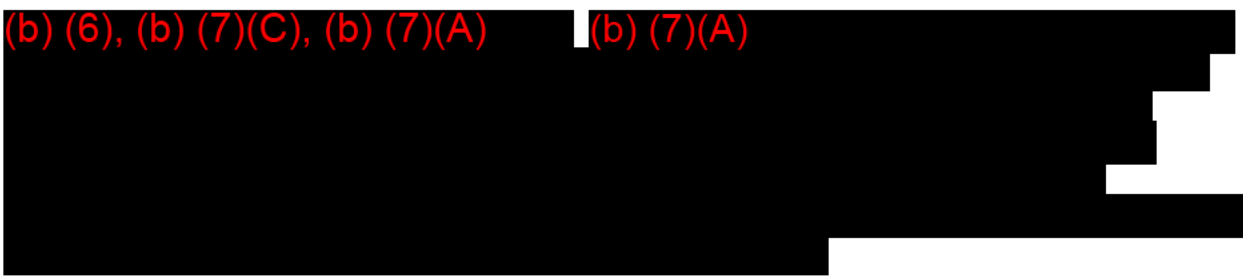
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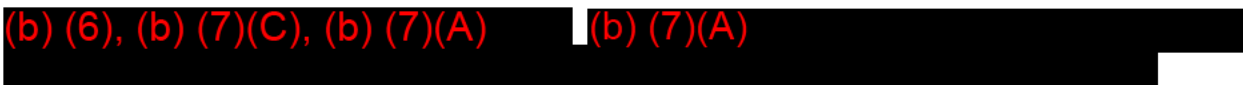
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(b) (6), (b) (7)(C), (b) (7)(A) (b) (7)(A)

Individual Volume Payee, (b) (6), (b) (7)(C) We initiated a site review based on an allegation the payee was charging unauthorized fees. We made a final misuse determination of \$9,849 affecting eight beneficiaries. The payee repaid the full amount to affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination and retained the payee, and all case actions are complete.

Individual Volume Payee, (b) (6), (b) (7)(C) During the site review, we found that the payee charged unauthorized fees. We made a final misuse determination of \$10,326 affecting 13 beneficiaries. The payee repaid the full amount to affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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Mitchell Manor Convalescent Home, McAlester, OK. During the site review, we discovered there was prior incidence of employee theft. The organization terminated the employee. We conducted a misuse investigation after the fact and concurred with the loss identified by the organization. We made a final misuse determination of \$88,494 affecting 22 beneficiaries. The payee repaid the full amount to the affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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Representative Payee Services, Colville, WA. During a site review, we determined the payee commingled beneficiary funds in their operating account and used them to pay operating expenses. We made a final misuse determination of \$202 affecting 28 beneficiaries. The payee repaid the full amount to affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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The Arc of Steuben, Bath, NY. During the site review, we discovered an isolated incidence of employee theft. We made a final misuse determination of \$1,036 affecting three beneficiaries. The organization terminated the employee and repaid all of the beneficiaries the full amount. The payee has cooperated with the investigation. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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Unity House of Cayuga County, Auburn, NY. During the site review, we discovered an isolated incidence of employee theft. We made a final misuse determination of \$19,177 affecting eight beneficiaries. The organization terminated the employee(s) and repaid the total amount of misused funds. The payee has cooperated with the investigation. We referred the case to OIG. OIG took appropriate action based upon available information. We made a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A)

(b) (7)(A)

Updates for 2021 Misuse Allegations

ARC of Midland, Midland, MI. During the site review, we discovered this organization charged unauthorized fees for payee services. The amount of estimated misuse funds is unknown, affecting two beneficiaries. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We made a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A)

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August Sun LLC, Sandy, UT. During the site review, we discovered there was a prior incidence of employee theft. The final amount of misuse was \$700 affecting one beneficiary. We retained the payee because this was an isolated incident. The employee involved no longer works at the facility and the payee has placed corrective measures to prevent future incidents. We confirmed the payee repaid the affected beneficiary directly for the full amount of misuse. We referred the case to OIG.

Update: OIG took appropriate action based upon available information. The payee repaid the full amount to all affected beneficiaries. We made a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A)

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Compass Residential & Consulting, Carmel, IN. During the site review, we discovered there was a prior incidence of employee theft. The misuse investigation is ongoing. We estimated the misuse to be \$26,307 affecting 37 beneficiaries. The organization terminated the individual who misused the funds and referred the issue to local law enforcement. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any additional misused funds. We will refer the case to OIG after completing the misuse determination.

Update: We made a final misuse determination of \$42,495 affecting two beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. The payee repaid the full amount to all affected beneficiaries. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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Educare, Houston, TX. From a site review, we discovered a large unaccounted cash withdrawal. The misuse investigation is ongoing. The estimated amount of misuse was \$9,312 affecting two beneficiaries. We retained the payee pending the outcome of the investigation. Continued suitability is contingent on their cooperation and repayment of any additional misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We made a favorable suitability determination and retained the payee, and all case actions are complete.

God Blessing Home, Garden Grove, CA. During the site review, we discovered this payee was allegedly overcharging room and board amounts. The estimated amount of misuse was \$4,406 affecting one beneficiary. We retained the payee pending the outcome of the investigation. Continued suitability is contingent on their cooperation and repayment of any additional misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We made a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A)

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HATS, Gallatin, TN. During the site review, we discovered an incidence of employee theft. The current estimate of misuse is \$8,000 affecting three beneficiaries. The organization terminated the individual who misused the funds and referred the issue to local law enforcement. The payee alleged that the employee was prosecuted and ordered to repay \$1,230 which the payee repaid to the affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any additional misused funds. The misuse investigation is ongoing.

Update: We made a final misuse determination of \$1,230 affecting three beneficiaries. The payee repaid the full amount to all affected beneficiaries. We made a favorable suitability determination and retained the payee, and all actions are complete.

(b) (7)(A)

(b) (7)(A)

Hope Network Homes of Opportunity Inc, Pontiac, MI. During the site review, we discovered there was a prior incidence of employee theft. The misuse investigation is ongoing. The current estimate of misuse is \$2,604 affecting five beneficiaries. The organization terminated the individual who misused the funds and referred the issue to local law enforcement. The payee repaid the affected beneficiaries the estimated amount of misuse. We will refer the case to OIG after completing the misuse determination.

Update: We made a final misuse determination of \$2,604 affecting five beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. The payee repaid the full amount to all affected beneficiaries. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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(b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C)

(b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

Individual Family Payee, (b) (6), (b) (7)(C) During the site review, the payee divulged that they used beneficiary funds for their own expenses for a short time when they were (b) (6), (b) (7)(C)

had already started saving to repay the beneficiary. The final amount of misuse was \$266 affecting one beneficiary. The payee repaid the full amount. We made a favorable suitability determination and retained the payee. We referred the case to OIG. OIG took appropriate action based upon available information.

Update: Recovery and repayment actions are complete.

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

(b) (7)(A)

Individual Family Payee, (b) (6), (b) (7)(C) During a site review, a beneficiary made a misuse allegation stating that this payee might be using funds for their personal purchases. We removed the payee and took appropriate action for all beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. The misuse investigation is ongoing. The number of affected beneficiaries and the amount of misused funds is not yet available. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We made a favorable suitability determination and retained the payee, and all case actions are complete.

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(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

Individual Non-Family Payee, (b) (6), (b) (7)(C) During the site review, we discovered this individual charged unauthorized fees for payee services. The current estimate of misuse is \$21,645 affecting 11 beneficiaries. We removed the payee and took appropriate action for all beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. We referred the case to OIG. OIG took appropriate action based upon available information. The misuse investigation is ongoing.

Update: We made a final misuse determination of \$258 affecting 3 beneficiaries. The payee directly repaid the full amount to all affected beneficiaries. All case actions are complete.

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

Individual Volume Payee, (b) (6), (b) (7)(C) During the site review, a beneficiary made a misuse allegation. The amount of estimated misuse funds is unknown, affecting one beneficiary. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We made a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

(b) (7)(A) [REDACTED]

[REDACTED]

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A) [REDACTED]

[REDACTED]

Individual Volume Payee, (b) (6), (b) (7)(C) During the site review, we discovered this individual charged unauthorized fees for payee services. The amount of estimated misuse funds is unknown, affecting eight beneficiaries. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We made a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A) (b) (7)(A) [REDACTED]

[REDACTED]

(b) (7)(A) (b) (7)(A) [REDACTED]

[REDACTED]

Las Flores Convalescent Hospital, Gardena CA. During the site review, a beneficiary made a misuse allegation. The amount of estimated misused funds is \$580 affecting one beneficiary.

We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A) (b) (7)(A)

Long Island ACLD, Bethpage, NY. During the site review, we discovered there was a prior incidence of employee theft. The current estimate of misuse is \$2,755 affecting six beneficiaries. We retained the payee because this was an isolated incident. The employees involved no longer work at the facility, and the payee has placed corrective measures to prevent future incidents. The payee repaid all affected beneficiaries. Continued suitability of the payee is contingent on their cooperation and repayment of any additional misused funds discovered. We referred the case to OIG. OIG took appropriate action based upon available information.

Update: We made a final misuse determination of \$8,646 affecting six beneficiaries. The payee repaid the full amount to all affected beneficiaries. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Long Island Head Injury Association, Hauppauge, NY. During the site review, we discovered there was a prior incidence of employee theft. The current estimate of misuse is \$9,651 affecting 10 beneficiaries. We retained the payee because this was an isolated incident. The employees involved no longer work at the facility, and the payee has placed corrective measures to prevent future incidents. We confirmed the payee repaid the affected beneficiaries directly for the estimated amount of misuse. Continued suitability of the payee is contingent on their cooperation and repayment of any additional misused funds discovered. We referred the case to OIG.

Update: OIG took appropriate action based upon available information. We made a final misuse determination of \$9,651. The payee repaid the full amount to all affected beneficiaries. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A) (b) (7)(A)

(b) (7)(A)

Mable's Warm Embrace, Detroit, MI. During the site review, we discovered this organization may have charged unauthorized fees for payee services. The current estimate of misuse is \$480, affecting two beneficiaries. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Manna House Payee Service, Bakersfield, CA. During the site review, we discovered this organization charged unauthorized fees for payee services. The misuse investigation is ongoing, and the number of affected beneficiaries and the amount of misused funds is not yet available. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Meadowbrook Nursing Home, Tucker, GA. During the site review, we discovered some financial irregularities. The misuse investigation is ongoing, and the number of affected beneficiaries and the amount of misused funds is not yet available. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: Our investigation found that the allegation of misuse was unsubstantiated, and no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Mesa Independent Living, Houston, TX. During a site review it was discovered that the payee failed to report the death of a beneficiary but continued to receive their funds. The misuse investigation is ongoing, and the number of affected beneficiaries and the amount of misused funds is not yet available. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We referred the case to OIG. OIG took appropriate action based upon available information.

Update: The misuse investigation determined that no misuse occurred. Funds received after the death of the beneficiary are considered a death overpayment. We are pursuing

recovery of the funds according to established overpayment policy. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A)

(b) (7)(A)

Quality of Life Guardian, Alamogordo, NM. During the site review, we discovered some financial irregularities. The number of affected beneficiaries and the amount of misused funds is not yet available while the investigation is underway. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred; however, based on other factors we removed the payee and took appropriate action for all beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. All case actions are complete.

St. Marcos Care Home, Buena Park, CA. During the site review, we discovered the payee was overcharging beneficiaries for monthly room and board. The misuse investigation is ongoing, and the number of affected beneficiaries and the amount of misused funds is not yet available. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

ServiceNet Inc, Northampton, MA. During the site review, we discovered an incidence of employee theft. The misuse investigation is ongoing, and the number of affected beneficiaries and the amount of misused funds is not yet available. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation found that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Sharon Care Center, Los Angeles, CA. During the site review, we discovered the payee was withholding beneficiaries' personal needs allowances. The estimated amount of misuse was \$1,098 affecting four beneficiaries. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Southwest Center, St. George, UT. From a site review, we discovered a questionable and unaccounted transfer of money. The misuse investigation is ongoing. The estimated amount of misuse was \$800 affecting one beneficiary. The employee who made the transfer was no longer working for the payee at the time of the review. The payee repaid the affected beneficiary the amount of estimated misuse. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any additional misused funds discovered during the investigation. We will refer the case to OIG after completing the misuse determination.

Update: We made a final misuse determination of \$800 affecting one beneficiary. We referred the case to OIG. OIG took appropriate action based on available information. The organization repaid the full amount to the affected beneficiary. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

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UCP Western Mass Inc, Pittsfield, MA. During the site review, we discovered this organization charged unauthorized fees for payee services. The current estimate of misuse is \$10,500 affecting 14 beneficiaries. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: We made a final misuse determination of \$3,180 affecting seven beneficiaries. The payee repaid the full amount to all affected beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

West Bay Residential Services, Warwick, RI. During the site review, we discovered an incidence of employee theft. The current estimate of misuse is \$240 affecting one beneficiary. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: We made a final misuse determination of \$120, affecting one beneficiary. The payee repaid the full amount to the affected beneficiary. We referred the case to OIG. OIG took appropriate action based upon available information. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Westside Manor, Los Angeles, CA. During the site review, a beneficiary made a misuse allegation. The amount of estimated misused funds is \$580 affecting one beneficiary. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on their cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Updates for FY 2020 Misuse Allegations

A&V Payee Services, Anchorage, AK. During the site review, we discovered this organization charged unauthorized fees for payee services. The final misuse amount was \$290 affecting one beneficiary. We removed the payee and took appropriate action, either finding a new payee or transitioning the beneficiary to direct payment. We referred the case to OIG. OIG took appropriate action based upon available information. Reissuance and recovery actions are pending. We repaid the affected beneficiary, and recovery is still pending.

Update: We were unsuccessful in recovering this debt. We have stopped further recovery efforts since the amount of misuse is under \$3,000. All case actions are complete.

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(b) (7)(A)

Far North Management Services, Wasilla, AK. We discovered this organization charged unauthorized fees for payee services. The final misuse amount was \$1,730 affecting three beneficiaries. We removed the payee and took appropriate action for all beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. We referred the case to OIG. OIG took appropriate action based upon available information. We recovered and repaid \$998 and are pursuing recovery of the remaining \$732.

Update: We repaid the affected beneficiaries the full amount of misuse. We were unsuccessful in recovering the final \$732. We have stopped further recovery efforts since the amount of misuse is under \$3,000. All case actions are complete.

Freda's Home of Love, Los Angeles, CA. During the site review, we discovered this organization charged unauthorized fees. The misuse investigation is ongoing, with three affected beneficiaries. The amount of misused funds is not yet available. We removed the payee and took appropriate action for all beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. After further investigation, we made a final misuse determination of \$106 affecting one beneficiary. The payee repaid the full the beneficiary directly, and we determined the facility remains suitable to remain as payee. We referred the case to OIG.

Update: OIG took appropriate action based upon available information. All case actions are complete.

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Heitmanis Law Group, St. Clair Shores, MI. From a site review, we discovered that this organization might be charging beneficiaries unauthorized fees. The misuse investigation is ongoing, and the number of affected beneficiaries and the amount of misused funds is not yet available. We retained the payee pending the outcome of the investigation. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A) (b) (7)(A)

(b) (7)(A) (b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

(b) (7)(A) [REDACTED]

[REDACTED]

(b) (7)(A), (b) (6), (b) (7)(C) [REDACTED] (b) (7)(A) [REDACTED]

[REDACTED]

(b) (7)(A), (b) (6), (b) (7)(C) [REDACTED] (b) (7)(A) [REDACTED]

[REDACTED]

(b) (7)(A), (b) (6), (b) (7)(C) [REDACTED] (b) (7)(A) [REDACTED]

[REDACTED]

(b) (7)(A) [REDACTED] (b) (7)(A) [REDACTED]

[REDACTED]

Lifepath, Bethlehem, PA. During the site review, we discovered an incidence of possible employee theft. The number of affected beneficiaries and the amount of misused funds is not yet available with the investigation ongoing. The payee terminated the employee and referred the issue to local law enforcement. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on its cooperation and repayment of any misused funds. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Little Flower Children's Service, Wading River, NY. During the site review, we discovered an incidence of possible employee theft. The misuse investigation is ongoing. The estimated amount of misuse is \$1,690 but the number of affected beneficiaries is unknown. The payee terminated the employee and referred the issue to local law enforcement. We retained the payee pending the outcome of the investigation. Continued suitability of the payee is contingent on its cooperation and repayment of any misused funds. We referred the case to OIG. OIG took appropriate action based upon available information. We continued the misuse investigation. Based on additional information, we updated the estimated amount of misuse to \$44,000 and the number of affected beneficiaries is yet to be determined.

Update: We made a final misuse determination of \$43,583 affecting 26 beneficiaries. The payee repaid the full amount to all affected beneficiaries. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

Matsu Payee Services, Wasilla, AK. We discovered this organization charged unauthorized fees for payee services. The final misuse amount was \$28,607 affecting two beneficiaries. We removed the payee and took appropriate action for all beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. We referred the case to OIG. OIG took appropriate action based upon available information. The payee submitted additional documentation after receiving the misuse overpayment notice. We revised our determination based on this additional information. The final misuse amount is \$237 affecting one beneficiary. We repaid the affected beneficiary, but recovery of the misused funds is still outstanding.

Update: We were unsuccessful in recovering the full misuse amount of \$237. We have stopped further recovery efforts since the amount of misuse is under \$3,000. All case actions are complete.

(b) (7)(A)

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Peninsula Payee Services, Kasilof, AK. We discovered this organization charged unauthorized fees for payee services. The final misuse amount was \$400, affecting two beneficiaries. We removed the payee and took appropriate action for both beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. We referred the case to OIG. OIG took appropriate action based upon available information. We repaid the affected beneficiaries the full amount, but recovery of the misused funds is still outstanding.

Update: We were unsuccessful in recovering the \$400 debt. We have stopped further recovery efforts since the amount of misuse is under \$3,000. All case actions are complete.

People's Choice, Atlanta, GA. From a site review, we discovered this organization made questionable transfers and withdrawals from its collective account. The misuse investigation is ongoing, and the number of affected beneficiaries and the amount of misused funds is not yet available. We retained this payee because the payee is cooperating with the investigation, and the allegation is not yet substantiated. We referred the case to OIG. OIG took appropriate action based upon available information. The issue investigation is ongoing.

Update: The investigation determined that allegation of misuse was unsubstantiated, and no misuse was found. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A)

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Reliable Support Services, Anchorage, AK. We discovered this organization charged unauthorized fees for payee services. The final misuse amount was \$724 affecting three beneficiaries. We removed the payee and took appropriate action for all beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. We referred the case to OIG. OIG took appropriate action based upon available information. Reissuance and recovery actions are pending. We repaid the affected beneficiaries the full amount, but recovery of the misused funds is still outstanding.

Update: We were unsuccessful in recovering the \$724 in misused benefits. We have stopped further recovery efforts since the amount of misuse is under \$3,000. All case actions are complete.

Southern Community, Dry Branch, GA. This organization reported during its site review that a former employee stole funds. The payee terminated the employee and referred the matter to local law enforcement. The estimated amount of misuse is \$2,132 affecting three beneficiaries. We retained the payee because the theft was an isolated incident, and the payee is cooperating with our investigation. The payee alleges that it repaid the affected beneficiaries, and we requested financial records to complete the investigation and took action to prevent future misuse. We referred the case to OIG. OIG took appropriate action based upon available information. We are working on completing the misuse determination.

Update: We made a final misuse determination of \$2,132 affecting three beneficiaries. The payee repaid the full amount to all affected beneficiaries. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A)

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Updates for FY 2019 Misuse Allegations

(b) (7)(A)

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Eagle Payee Services, Rapid City, SD. We initiated a targeted review when this fee-for-service organization reported it no longer wished to serve as a representative payee organization. During the review, we discovered suspected misuse affecting one beneficiary. The amount of misused

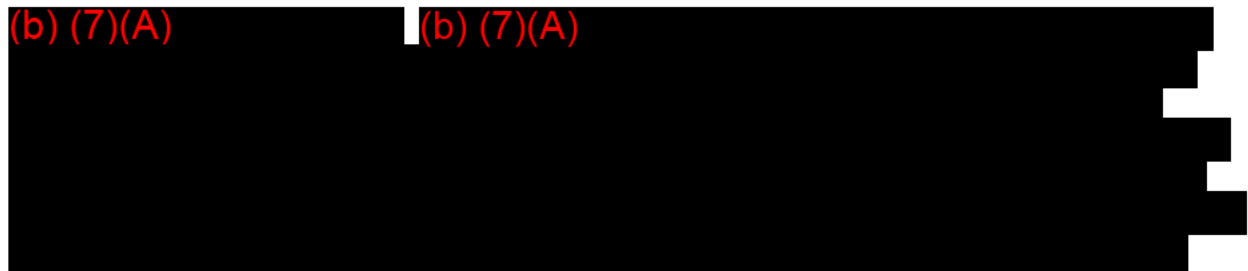
funds is not yet available. We removed the payee, and took appropriate action for all beneficiaries, either finding a new payee or transitioning the beneficiary to direct payment. The misuse investigation is ongoing, but we are experiencing difficulty since the business is no longer in operation, and the payee is not cooperating with our efforts to gather evidence. The misuse investigation is ongoing. We will refer the case to OIG after completing the misuse determination.

Update: The misuse investigation determined that no misuse occurred. All case actions are complete.

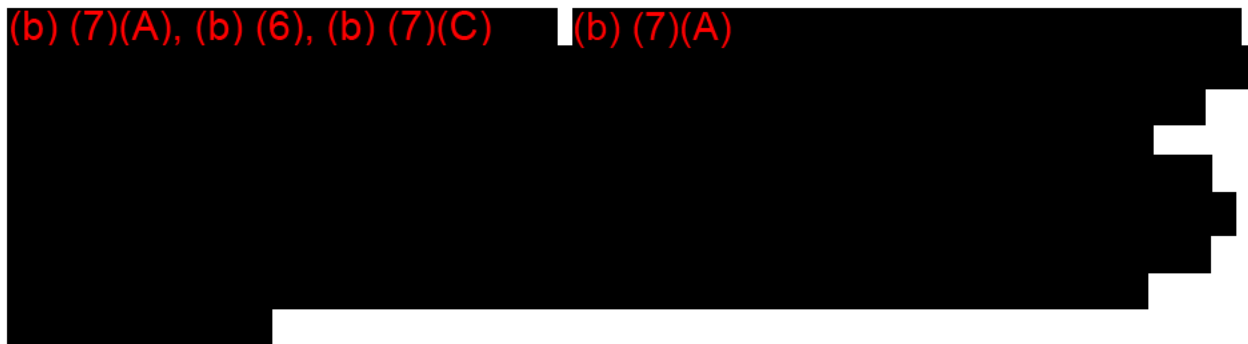
East Texas Center for Independent Living, Tyler, TX. This organization reported an incident of employee theft. The misuse investigation is ongoing affecting 54 beneficiaries, and the initial estimate of misuse was \$134,000. We retained the payee because the theft was an isolated incident, the responsible employee was terminated, and the issue referred to law enforcement. The organization is cooperating with our investigation. We made a final misuse determination in the amount of \$100,360 affecting 53 beneficiaries. The payee repaid the full amount to all affected beneficiaries. We referred the case to OIG.

Update: OIG took appropriate action based upon available information. We conducted a favorable suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A) (b) (7)(A)



(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)



Individual Non-Family Payee, (b) (6), (b) (7)(C) We initiated a targeted review based on allegations of misuse of one beneficiary reported by another agency. We removed the payee, and took appropriate action for the beneficiary, either finding a new payee or transitioning the

beneficiary to direct payment. We made a final misuse determination of \$335. We referred the case to OIG. OIG took appropriate action based upon available information. We will repay the beneficiary as we recover funds from the payee. The payee has not yet repaid any of the misused funds. (b) (6), (b) (7)(C)

[REDACTED]

Update: We recovered the full amount of misused funds and repaid the affected beneficiary. All case actions are complete.

(b) (7)(A)

[REDACTED]

(b) (7)(A)

[REDACTED]

[REDACTED]

Kokua, Lacey, WA. We initiated a targeted review based on a self-reported incident of employee theft. The estimated amount of misuse is \$10,000 affecting 10 beneficiaries. We retained the payee because the theft was an isolated incident, and the payee is cooperating with our investigation. The organization no longer employs the individual who misused the funds, and the payee referred the incident to local law enforcement. Continued suitability of the payee will remain contingent on repaying the misused funds. We referred the case to OIG. We have not yet finalized our misuse determination or pursued any administrative actions. OIG took appropriate action based upon available information.

Update: We made a final misuse determination of \$12,572. The payee repaid the full amount to affected beneficiaries. We conducted a suitability determination and retained the payee, and all case actions are complete.

(b) (7)(A)

[REDACTED]

(b) (7)(A)

[REDACTED]

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Pueblo Diversified Industries Inc., Pueblo, CO. We initiated a targeted review based on allegations of misuse by another agency against this organization. The misuse investigation is ongoing, and the estimated amount of misuse is \$16,170 affecting 26 beneficiaries. We retained this payee during our investigation. After further investigation we revised our estimate of misuse

to \$11,748 affecting 33 beneficiaries. We referred the case to OIG. We retained the payee pending the outcome of the determination. OIG took appropriate action based upon available information.

Update: We made a final determination of misuse of \$11,748. The payee repaid the full amount to affected beneficiaries. We made a favorable suitability determination and retained the payee, and all case actions are complete.

Updates for FY 2018 Misuse Allegations

(b) (7)(A) (b) (7)(A)

(b) (7)(A) (b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C) (b) (7)(A)

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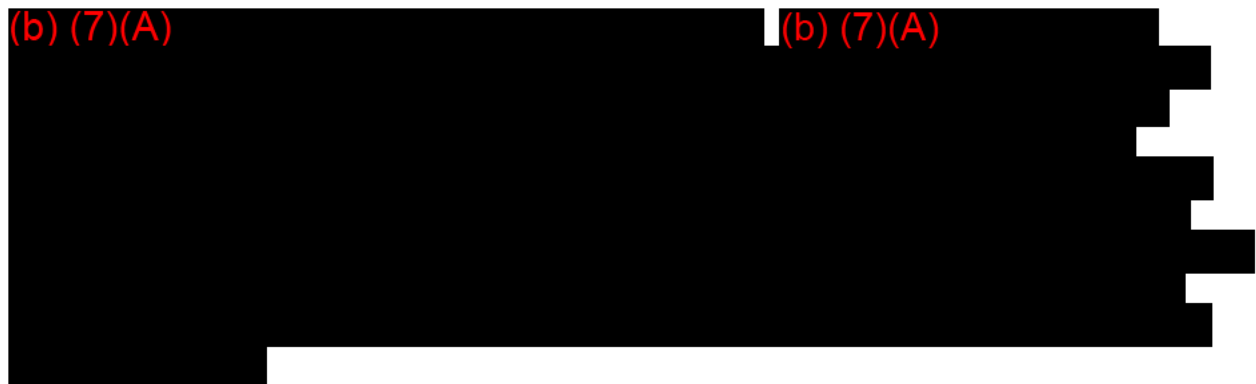
Paloma Blanca Health and Rehabilitation, Albuquerque, NM. As a result of the site review, we discovered an isolated instance of employee theft. We retained this organization because it is cooperating with the investigation and terminated the employee involved in the incident. Suitability is contingent on continued cooperation and repaying any misused funds. We made a final misuse determination of \$1,335 affecting four beneficiaries. We referred the case to OIG. OIG took appropriate action based upon available information. A final misuse determination is still pending. Repayment and recovery actions are pending.

Update: The payee repaid the full amount to all affected beneficiaries. We made a favorable suitability determination and retained the payee, and all case actions are complete.

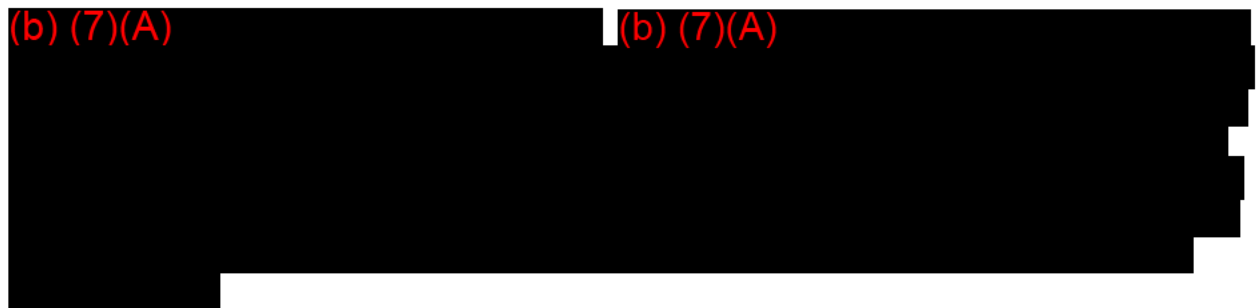
Standing Rock Child Protection Services, Ft. Yates, ND. We conducted a targeted review because the organization could not provide appropriate documentation for beneficiary expenses. The director of the organization had previously resigned, and there had been significant recent staff turnover. The final determination of misused funds was \$269,308 affecting 38 beneficiaries. We removed the payee and took appropriate action for all beneficiaries, either finding a new payee or transitioning them to direct pay. We referred the case to OIG. OIG took appropriate action based upon available information. We are reviewing new evidence as it is submitted and may revise our misuse determination as a result. Based on additional evidence, we revised the final misuse determination to \$208,177. Recovery and repayment actions are pending.

Update: The payee disputed the misuse overpayment amount and submitted further evidence. We revised the final misuse determination to \$175,038. We recovered the full amount and repaid all affected beneficiaries. All case actions are complete.

(b) (7)(A) (b) (7)(A)



(b) (7)(A) (b) (7)(A)



Updates for FY 2017 Misuse Allegations

Advocates Payee Services Inc., Caldwell, ID. The organization charged fees in excess of those permissible, affecting four beneficiaries. We estimated the amount of misused funds at \$15,000 affecting four beneficiaries. We removed the payee. We took appropriate action for each of the four beneficiaries, either finding a new payee or transitioning them to direct pay. We made a final misuse determination of \$1,513 affecting one beneficiary. We referred the case to OIG. OIG took appropriate action based upon available information. We repaid the affected beneficiaries and sought recovery through the facility's insurance policy.

Update: We recovered the full amount of misused funds, and all case actions are complete.

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(b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C)

(b) (7)(A)

Individual Non-Family Payee, (b) (6), (b) (7)(C) The former payee could not account for the funds of the beneficiaries. The estimated amount of misused funds was \$80,000 affecting eight beneficiaries. We removed the payee. We took appropriate action for all beneficiaries, either finding a new payee, or transitioning them to direct pay. The final misuse determination was \$53,205. We referred the case to OIG. OIG took appropriate action based upon available information.

Update: We recovered the total amount \$53,205 from the payee and repaid all affected beneficiaries. All case actions are complete.

Updates to FY 2016 Misuse Allegations

(b) (7)(A)

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(b) (7)(A)

(b) (7)(A), (b) (6), (b) (7)(C)
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Updates to FY 2015 Misuse Allegations

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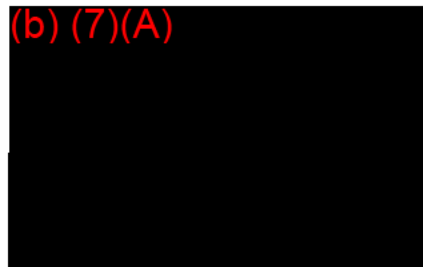
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Updates to FY 2014 Misuse Allegations

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Updates to FY 2013 Misuse Allegations

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Conclusion

Individuals who need payees are among our most vulnerable beneficiaries. We carefully follow statute and regulations when deciding to appoint a payee, and when we do, we make every effort to choose one who is well qualified.

The results of our site reviews give us confidence that our monitoring efforts protect these beneficiaries by:

- Deterring payee misconduct;
- Providing a strong oversight message to payees;
- Ensuring that FFS payees continue to be qualified under the law;
- Establishing open lines of communication between our agency and the payees; and
- Promoting good payee practices.

As stewards of public funds, we take our responsibility to our beneficiaries and the taxpayers seriously. We look forward to continuing to work with Congress on measures to improve our programs.

Appendix A – Descriptions of Findings and Corrective Actions Taken

	Description of Payee Findings	Corrective Action Taken
Over SSI Resource Limit	SSI recipients acquire or accumulate countable resources that exceed \$2,000 for an individual or \$3,000 for a couple, thus causing ineligibility.	We reminded payees of the resource limit and the requirement to report when recipients exceed the limit. We recommended the payees put controls in place to flag accounts nearing this limit. In addition, we sent overpayment notices to begin the recovery process.
Incorrect or Unauthorized Fee Charged	In some cases, the payees charged a fee that we did not authorize. In other situations, we authorized the payees to charge a fee, but the payees charged fees in excess of the statutory limit.	We reviewed the P&A grantees findings. If we determined unauthorized fees were charged, we instructed payees who were not FFS payees to stop charging fees and developed for misuse. We also instructed the approved FFS payees to stop charging a fee in excess of the statutory limit. Regardless of the length of time or amount of the erroneous fees charged, the payee must refund the excess amounts to the beneficiary immediately upon discovery. If unable to resolve the excess fees, the FO should initiate development for a new payee, investigate, and develop for possible misuse of benefits.
Failure to Report Changes	Payees failed to comply with reporting responsibilities for both Social Security and SSI beneficiaries. The most common findings in this area were a failure to report a change in a beneficiary's residence address or change in income.	We reviewed reporting responsibilities with payees who did not report the changes and updated each beneficiary's record.

Payee Did Not Exercise Oversight of Benefits (Conduit Payee)	Payees did not use the beneficiaries' benefits for their current needs, but rather gave the funds directly to the beneficiaries.	We completed capability determinations for the beneficiaries who received their benefits in full directly from the payees to determine if the beneficiaries could manage their own money. For those beneficiaries we found capable, we began paying them directly. We evaluated the payee's continued suitability to serve and changed payees when appropriate. We reminded retained payees to report whenever they believe a beneficiary in their care is capable of managing his or her money.
Annual Accounting Forms Not Returned	Payees did not complete annual accounting forms to account for how they used beneficiaries' funds.	We obtained outstanding accounting forms from payees. If the payee did not cooperate with these efforts, we determined them unsuitable to continue serving and transitioned beneficiaries to new payees or direct payment.
Recordkeeping Findings (e.g., minor math errors, weak internal controls)	Payees had poor recordkeeping practices or made bookkeeping errors.	We instructed payees on how to improve their recordkeeping, and we worked diligently with payees to ensure they improved.
Misuse Suspected	There was an allegation of misuse during the review, or there was an indication of misuse during review of financial records.	We reviewed the P&A grantee's findings. If the allegation was unfounded, we closed out the finding. If further investigation was needed, we made a misuse determination, notified the payees, and pursued recovery of funds when a misuse investigation substantiated the allegation; or we are still investigating the misuse allegations.

<p>Potential Payee Suitability Finding – Financial</p>	<p>A financial finding brought into question the suitability of the payee to serve, such as failure to properly and effectively administer beneficiary funds or failure to meet insurance or financial obligations.</p>	<p>We determined the payees were unsuitable to continue serving after investigation of the finding and transitioned beneficiaries to new payees or direct payment if appropriate, or we are still looking into these findings. In other cases, we determined the payee remained suitable, and instructed these payees on how to improve their performance as payee and worked with them to ensure they improved.</p>
<p>Potential Payee Suitability Finding – Non-Financial</p>	<p>A non-financial finding brought into question the suitability of the payee to serve, such as a potential conflict of interest or failure to provide information requested during the review.</p>	<p>We determined the payees were unsuitable to continue serving after investigation of the finding and transitioned beneficiaries to new payees or direct payment if appropriate, or we are still looking into these findings. In other cases, we determined the payee remained suitable, and instructed these payees on how to improve their performance as payee and worked with them to ensure they improved.</p>
<p>Bank Account Issues</p>	<p>Issues with Bank Account could involve the following:</p> <ol style="list-style-type: none"> 1. Incorrect Titling of Bank Accounts - Bank accounts did not clearly reflect that the beneficiary, rather than the payee, was owner of the account, or the payee did not title the account in such a way to prevent the beneficiary from gaining direct access to the account. The bank account(s) in question may be an individual or collective account. 2. Bank Account Not Interest Bearing - Payees did not use interest-bearing accounts for beneficiaries' funds. 3. Collective Account Not Approved by SSA - Payees did 	<ol style="list-style-type: none"> 1. At our direction, payees re-titled their accounts. 2. We directed the payees to move beneficiaries' funds to interest-bearing accounts. 3. We reviewed the accounts to ensure each met our requirements. 4. We directed payees to move beneficiaries' funds into correctly titled accounts.

	<p>not obtain our approval before they deposited a beneficiary's funds in a collective bank account. Payees must ask for and receive permission before depositing a beneficiary's funds to ensure the account is properly titled, account records are clear and up-to-date, and the payee has agreed to make account and supporting records available.</p> <p>4. Beneficiary Funds in Agency Operating Account - Payees deposited beneficiaries' funds in an operating account that did not reflect beneficiaries' ownership of funds</p>	
Same Deficiencies from Previous Reviews Found	Payee repeated the same deficiencies found in a previous review.	Conduct a suitability determination of the payee according to established policy.
Dedicated Account Funds Misapplied	The site review findings determined the payee may have knowingly misapplied funds from a dedicated bank account.	Investigate the finding and seek repayment from the payee for the misapplied amount on a dollar-for-dollar basis.

Appendix B – Descriptions of Types of Referrals

Referrals to appropriate local, state, or federal agency for health or safety findings to the beneficiary

If the reviewer becomes aware of a serious risk of harm to the beneficiary, for example:

- Immediate health and safety threat
 - Flagged for immediate action by SSA;
 - Evidence of physical abuse (e.g., bruises, burns, scars, etc.);
 - Malnourishment;
 - Unsafe housing and living conditions; or
 - Worker exploitation.
- Noncritical health or safety finding.

Referrals to appropriate local, state, or federal agency for possible financial exploitation by individuals other than the representative payee

If the reviewer becomes aware of possible financial exploitation of a beneficiary by someone other than the representative payee (e.g., by family, friends, neighbors, caregivers, acquaintances, employers, or strangers), for example:

- Taking the beneficiary's money without permission;
- Failing to repay borrowed money or return property;
- Charging too much for services or not being responsive to requests the beneficiary paid the individual, agency, or company to do;
- Purchasing new or unusual "gifts"; or
- Exerting pressure on the beneficiary to change his or her will, life insurance, retirement annuity, etc.

Referrals to appropriate resources for beneficiary identified needs

The reviewer may refer the beneficiary to available resources in the beneficiary's community to assist with an identified need, only with written consent of the beneficiary or legal guardian, including:

- Community resources;
- Employment-related services;
- Housing assistance;
- Occupational/vocational skills or services; and
- Any other needs the reviewer identifies that will assist the beneficiary.