



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

Individual Representative Payees
Who Do Not Have a Social Security
Number in the Social Security
Administration's Payment Records

A-09-16-50159 | February 2017

OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: February 17, 2017

Refer To:

To: The Commissioner

From: Acting Inspector General

Subject: Individual Representative Payees Who Do Not Have a Social Security Number in the Social Security Administration's Payment Records (A-09-16-50159)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration had adequate controls to ensure it recorded individual representative payees' Social Security numbers in its payment records.

Please provide within 60 days a corrective action plan that addresses each recommendation. If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, 410-965-9700.


Gale Stallworth Stone

Attachment

Individual Representative Payees Who Do Not Have a Social Security Number in the Social Security Administration's Payment Records

A-09-16-50159



February 2017

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) had adequate controls to ensure it recorded individual representative payees' Social Security numbers (SSN) in its payment records.

Background

SSA is required to obtain the SSNs of representative payee applicants. SSA uses the representative payee's SSN to (1) verify the payee's identifying information; (2) determine whether the payee applicant is receiving Old-Age, Survivors and Disability Insurance or Supplemental Security Income; (3) determine whether the applicant is a convicted felon; and (4) determine whether the applicant previously served as a representative payee and has a history of poor payee performance or misuse.

An individual's SSN is required to establish a representative payee in the Electronic Representative Payee System (eRPS). SSA's automated systems process the representative payee's information and update the Master Beneficiary (MBR) or Supplemental Security Records (SSR).

We identified 224,264 beneficiaries in current pay status who had an individual representative payee who did not have his/her SSN recorded on the MBR/SSR.

Findings

SSA needs to improve controls to ensure it (a) records individual representative payees' SSNs in its payment records and (b) retains the application for representative payees who do not have an SSN. Based on our random sample, we estimate that 150,257 beneficiaries had an individual representative payee who had a valid SSN that SSA should have recorded on the MBR/SSR. Of these, 26,912 beneficiaries had representative payees whom, according to eRPS, SSA had terminated or not selected. From October 2004 to September 2016, SSA paid these representative payees about \$853.1 million. Furthermore, unless it takes corrective action, we estimate SSA will pay these representative payees about \$189.6 million in benefits annually.

In addition, we estimate that 22,426 beneficiaries had an individual representative payee who did not have an SSN, and SSA had not followed its policy to retain the paper application. These representative payees were not in eRPS. From April 2006 to September 2016, SSA paid these representative payees about \$1 billion. Furthermore, unless it takes corrective action, we estimate SSA will pay these representative payees about \$182.5 million in benefits annually.

Recommendations

We recommend that SSA:

1. Take appropriate action for the 77 beneficiaries whose representative payees' SSNs are not on the MBR/SSR, as identified by our audit.
2. Evaluate the results of its actions for the 77 beneficiaries and determine whether it should review the remaining population of 224,164 beneficiaries we identified.
3. Improve controls to ensure (a) it records representative payees' SSNs on the MBR/SSR and (b) its systems generate alerts when there is a discrepancy between representative payee information in eRPS and the MBR/SSR.

SSA agreed with our recommendations.

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ABBREVIATIONS

eRPS	Electronic Representative Payee System
MBR	Master Beneficiary Record
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
SSR	Supplemental Security Record
U.S.C.	United States Code

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) had adequate controls to ensure it recorded individual representative payees' Social Security numbers (SSN) in its payment records.

BACKGROUND

The Old-Age, Survivors and Disability Insurance (OASDI) program provides monthly benefits to retired and disabled workers, including their dependents and survivors.¹ The Supplemental Security Income (SSI) program provides payments to financially needy individuals who are aged, blind, and/or disabled.²

SSA appoints representative payees to receive and manage the payments of those beneficiaries who cannot manage or direct the management of their own benefits because of their youth or mental and/or physical impairments.³ A representative payee may be an individual or an organization. SSA selects representative payees when it would serve the beneficiaries' interests.⁴

SSA is required to obtain the SSNs of individual representative payee applicants.⁵ SSA uses the representative payee's SSN to (1) verify the representative payee's identifying information, (2) determine whether the payee applicant is receiving OASDI or SSI, (3) determine whether the applicant is a convicted felon, and (4) determine whether the applicant previously served as a representative payee and has a history of poor payee performance or misuse. SSA also uses the SSN to identify representative payee deaths and incarcerations.⁶

An individual's SSN is required to establish a representative payee in the Electronic Representative Payee System (eRPS). SSA's automated systems process the representative payee's information and update the Master Beneficiary (MBR) or Supplemental Security Records (SSR). Unless SSA records the representative payee's SSN on the MBR/SSR, there is a risk that SSA will not detect the representative payee's death or incarceration.

Although SSA is required to obtain the SSNs of individual representative payee applicants, it allows certain individuals who do not have an SSN to serve as representative payees. This includes undocumented noncitizens who have minor children receiving benefits and applicants who reside outside the United States. SSA employees must verify these individuals' identities

¹ *Social Security Act* § 201 *et seq.*, 42 U.S.C. § 401 *et seq.*

² *Social Security Act* § 1602 and 1611, 42 U.S.C. § 1381a and 1382.

³ The term "beneficiary" in this report refers to both OASDI beneficiaries and SSI recipients.

⁴ SSA, POMS, GN 00502.113.C (April 15, 2016).

⁵ SSA, POMS, GN 00502.117 (April 14, 2014).

⁶ SSA, POMS, GN 00502.112 (April 15, 2016), GN 00502.132 (June 7, 2016), and GN 00502.120 (April 15, 2016).

using acceptable evidence, such as a Government-issued identification.⁷ Since these payees do not have an SSN, SSA employees cannot process and establish the application in eRPS. Instead, SSA employees must take a paper application⁸ and record the representative payee's name and address on the MBR/SSR.

We identified 224,264 beneficiaries in current pay status who had an individual representative payee who did not have his/her SSN recorded on the MBR/SSR. From this population, we selected a random sample of 100 beneficiaries for review (see Appendix A).

RESULTS OF REVIEW

SSA needs to improve controls to ensure it (a) records individual representative payees' SSNs in its payment records and (b) retains the application for representative payees who do not have an SSN. Based on our random sample, we estimate that

- 150,257 beneficiaries had an individual representative payee who had a valid SSN that SSA should have recorded on the MBR/SSR. Of these, 26,912 beneficiaries had representative payees whom, according to eRPS, SSA had terminated or not selected. From October 2004 to September 2016, SSA paid these representative payees about \$853.1 million. Furthermore, unless it takes corrective action, we estimate SSA will pay about \$189.6 million in benefits, annually, to representative payees whom it had terminated or not selected.
- 22,426 beneficiaries had an individual representative payee who did not have an SSN, and SSA had not followed its policy to retain the paper application. These representative payees were not in eRPS. From April 2006 to September 2016, SSA paid these representative payees about \$1 billion. Furthermore, unless it takes corrective action, we estimate SSA will pay about \$182.5 million in benefits, annually, to representative payees who do not have an SSN or paper application supporting their selection (see Appendix B).

This occurred because SSA did not (1) record the representative payee's SSN on the MBR/SSR or retain a paper application supporting its selection of the representative payee and (2) remove terminated or non-selected representative payees from the MBR/SSR or update the information in eRPS. Finally, SSA's systems did not always generate alerts when employees did not record a representative payee's SSN on the MBR/SSR or when eRPS and the MBR/SSR had discrepant payee information.

⁷ SSA, POMS, GN 00502.110.A (April 15, 2016), GN 00502.117 (April 14, 2014), and GN 00502.190 (April 15, 2016).

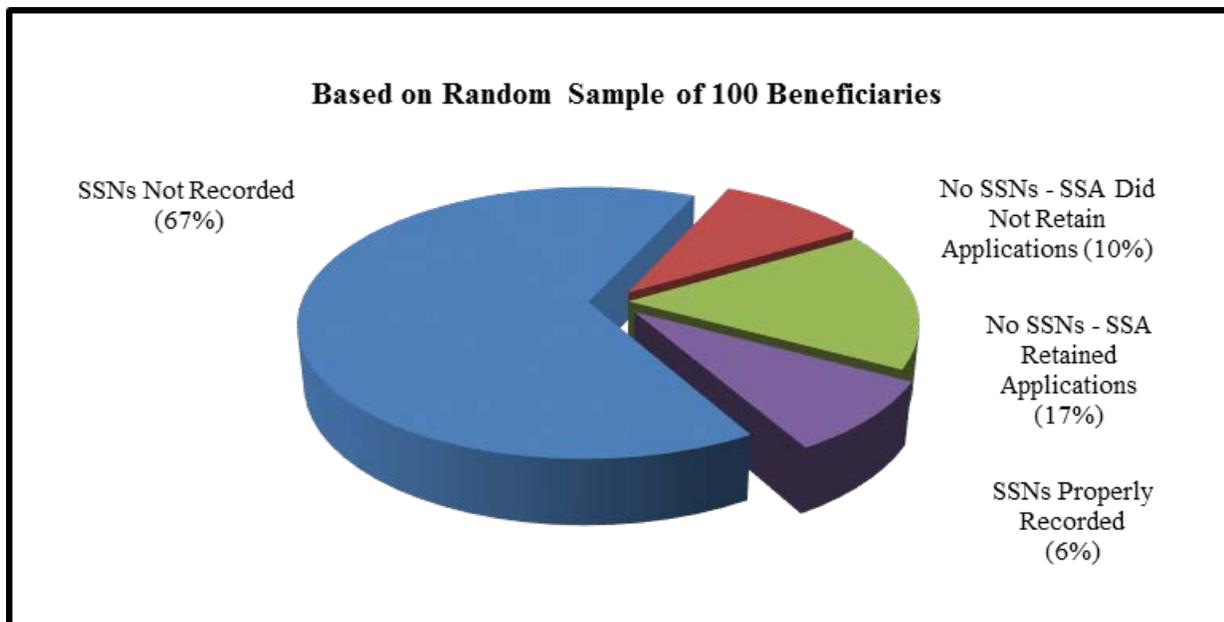
⁸ SSA, POMS, GN 00502.115 (April 15, 2016).

For the 100 beneficiaries in our sample, we found that

- 67 had representative payees who had a valid SSN that SSA should have recorded on the MBR/SSR,
- 10 had representative payees who did not have an SSN recorded on the MBR/SSR, and SSA had not followed its policy to retain the paper applications,⁹
- 17 had representative payees who did not have an SSN recorded on the MBR/SSR because they were undocumented noncitizens, and SSA followed its policy to retain the paper applications,¹⁰ and
- 6 had representative payees whose correct SSNs SSA subsequently recorded on the MBR/SSR and established in eRPS.

Figure 1 summarizes the results of our review.

Figure 1: Representative Payees' SSNs Not Recorded on SSA's Payment Records



⁹ This includes one beneficiary who had a representative payee whose SSN was unknown.

¹⁰ For 12 of the 17 beneficiaries, SSA retained an electronic copy of the paper application. For three beneficiaries, SSA retained a copy of the paper application. For the remaining two beneficiaries, SSA selected the representative payees before its policy to retain an electronic copy of the paper application became effective.

Representative Payee SSNs That Should Have Been on the MBR/SSR

SSA requires an individual's SSN to establish a representative payee in eRPS. SSA's automated systems process the representative payee's information and update the MBR/SSR.¹¹

The eRPS is an integrated system of representative payee information about pending, selected, non-selected, and terminated representative payees. SSA employees use information in eRPS to assist them in making representative payee determinations.¹² SSA employees also use eRPS to take and process representative payee applications.¹³ When SSA selects a representative payee in eRPS, it should update the MBR and SSR with information about the representative payee.

Of the 100 beneficiaries in our sample, 67 had a representative payee who had a valid SSN that SSA should have recorded on the MBR/SSR. Of the 67 beneficiaries,

- 52 had representative payees who had a properly established eRPS record.
- 12 had representative payees whom, according to eRPS, SSA had terminated or not selected. However, SSA employees did not remove them from the MBR/SSR and had paid them \$380,408 as of September 2016. We previously identified this condition in a 2015 report.¹⁴
- 3 had representative payees who did not have an eRPS record.

Since SSA did not record the representative payees' SSNs on the MBR/SSR, there is a risk that SSA will not detect their deaths or incarcerations. Of the 67 beneficiaries, 65 were entitled to OASDI benefits, and 2 were eligible for SSI payments. Our review found there were no systems alerts when a representative payee's SSN was not recorded on the MBR/SSR.

¹¹ SSA, POMS, GN 00502.117 (April 14, 2014).

¹² SSA, POMS, GN 00502.120 (April 15, 2016).

¹³ SSA, POMS, GN 00502.107 (April 15, 2016).

¹⁴ SSA, OIG, *Payments to Terminated or Non-selected Representative Payees* (A-09-13-23071), February 2015.

SSA Did Not Retain Applications for Representative Payees Who Did Not Have an SSN

Although SSA is required to obtain the SSNs of individual representative payee applicants, it allows certain individuals who do not have an SSN to serve as a representative payee. This includes undocumented noncitizens who have minor children receiving benefits and applicants who reside outside the United States. In these instances, SSA employees must verify their identity with acceptable evidence, such as a Government-issued identification.¹⁵ SSA employees cannot process these applications in eRPS. Instead, the representative payee applicant must complete and sign a paper application. SSA must store a copy of these applications electronically in its automated systems¹⁶ and record the representative payee's name and address on the MBR/SSR. According to SSA, since these representative payees do not have SSNs, their names and addresses are their primary identifiers.¹⁷

Of the 100 beneficiaries in our sample, SSA did not retain a copy of the application for 10 representative payees who did not have an SSN. For nine beneficiaries, the representative payees did not have an SSN recorded on the MBR/SSR because they were undocumented noncitizens and SSA did not follow its policy to retain the payee application. For the remaining beneficiary, we could not determine whether the representative payee had a valid SSN. The representative payee's SSN was not recorded on the MBR/SSR, SSA did not retain the payee application, and we could not determine whether the individual was an undocumented noncitizen. None of these representative payees were in eRPS.

As of September 2016, SSA had paid these representative payees \$467,608. For the 10 beneficiaries, 9 were eligible for SSI payments, and 1 was entitled to OASDI benefits. Our review found there were no systems alerts when a representative payee's SSN was not recorded on the MBR/SSR.

CONCLUSIONS

SSA needs to improve controls to ensure it (a) records individual representative payees' SSNs in its payment records and (b) retains the application for representative payees who do not have an SSN. Based on our random sample, we estimate that 150,257 beneficiaries had an individual representative payee who had a valid SSN that SSA should have recorded on the MBR/SSR. Of these, 26,912 beneficiaries had representative payees whom, according to eRPS, SSA had terminated or not selected. From October 2004 to September 2016, we estimate SSA paid these representative payees about \$853.1 million. Furthermore, unless it takes corrective action, we

¹⁵ SSA, POMS, GN 00502.110.A (April 15, 2016), GN 00502.117 (April 14, 2014), and GN 00502.190 (April 15, 2016).

¹⁶ SSA, POMS, GN 00502.110 (April 15, 2016) and GN 00502.107 (April 14, 2014).

¹⁷ SSA, POMS, GN 00502.110 (April 15, 2016), GN 00502.117 (April 14, 2014), and GN 00502.190 (April 15, 2016).

estimate SSA will pay about \$189.6 million in benefits, annually, to representative payees whom it had terminated or not selected.

In addition, we estimate that 22,426 beneficiaries had an individual representative payee who did not have an SSN, and SSA had not followed its policy to retain the paper application. These representative payees were not in eRPS. From April 2006 to September 2016, SSA paid these representative payees about \$1 billion. Furthermore, unless it takes corrective action, we estimate SSA will pay about \$182.5 million in benefits, annually, to representative payees who do not have an SSN or paper application supporting their selection (see Appendix B).

This occurred because SSA did not (1) record the representative payees' SSNs on the MBR/SSR or retain a paper application supporting its selection of the representative payees and (2) remove terminated or non-selected representative payees from the MBR/SSR or update the information in eRPS. Finally, SSA's systems did not always generate alerts when employees did not record a representative payee's SSN on the MBR/SSR or when eRPS and the MBR/SSR had discrepant payee information.

RECOMMENDATIONS

We recommend that SSA:

1. Take appropriate action for the 77 beneficiaries whose representative payees' SSNs are not on the MBR/SSR, as identified by our audit.
2. Evaluate the results of its actions for the 77 beneficiaries and determine whether it should review the remaining population of 224,164 beneficiaries we identified.
3. Improve controls to ensure (a) it records representative payees' SSNs on the MBR/SSR and (b) its systems generate alerts when there is a discrepancy between representative payee information in eRPS and the MBR/SSR.

AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix C.



Rona Lawson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

From the Social Security Administration’s (SSA) Master Beneficiary (MBR) and Supplemental Security Records (SSR), we obtained a data extract of 224,264 beneficiaries in current pay status whose individual representative payees did not have a Social Security number (SSN) recorded on the MBR/SSR as of January 2016. From this population, we selected a random sample of 100 beneficiaries for review.

To accomplish our objective, we

- reviewed the applicable sections of the *Social Security Act* and SSA’s Program Operations Manual System;
- interviewed SSA employees from the Offices of Operations and Systems;
- reviewed queries from SSA’s MBR, SSR, Representative Payee System, Payment History Update System, Numident, Online Retrieval System, Claims Folder Records Management System, and Paperless System; and
- determined whether SSA had recorded individual representative payees’ SSNs on the MBR/SSR and retained paper applications, when required, to support its selection of the representative payees.

We determined the computer-processed data from the MBR and SSR were sufficiently reliable for our intended use. We tested the data to determine their completeness and accuracy. These tests allowed us to assess the reliability of the data and achieve our audit objective.

We conducted audit work in Richmond, California, and Baltimore, Maryland, between June 2016 and January 2017. The entities audited were the Offices of the Deputy Commissioners for Operations and Systems.

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

Appendix B – SAMPLING METHODOLOGY AND RESULTS

We obtained a data extract from the Social Security Administration’s (SSA) Master Beneficiary (MBR) and Supplemental Security Records (SSR) of 224,264 beneficiaries in current pay status whose individual representative payees did not have a Social Security number (SSN) recorded on the MBR/SSR. From this population, we selected a random sample of 100 beneficiaries for review. Specifically, we determined whether SSA had recorded individual representative payees’ SSNs on the MBR/SSR and retained paper applications, when required, to support its selection of the representative payees.

The following tables provide the details of our sample results and statistical projections.

Table B–1: Population and Sample Size

Description	Beneficiaries
Population Size	224,264
Sample Size	100

Representative Payee SSNs That Should Have Been on the MBR/SSR

Of the 100 beneficiaries in our sample, 67 had a representative payee who had a valid SSN that SSA should have recorded on the MBR/SSR. Projecting these results to our population of 224,264 beneficiaries, we estimate that 150,257 beneficiaries had representative payees who had a valid SSN that SSA should have recorded in its payment records.

We also found that 12 had representative payees whom, according to the Electronic Representative Payee System (eRPS), SSA had terminated or not selected. However, SSA employees did not remove them from the MBR/SSR and had paid them \$380,408 as of September 2016. Projecting these results to our population of 224,264 beneficiaries, we estimate that SSA paid the representative payees about \$853.1 million to the representative payees for 26,912 beneficiaries from October 2004 to September 2016. Furthermore, unless it takes corrective action, we estimate SSA will pay about \$189.6 million in benefits, annually, to representative payees whom it had terminated or not selected.

Table B–2: Representative Payee SSNs That Should Have Been on the MBR/SSR

Description	Beneficiaries
Sample Results	67
Point Estimate	150,257
Projection – Lower Limit	131,097
Projection – Upper Limit	167,677

Note: All statistical projections are at the 90-percent confidence level.

Table B-3: Representative Payees Who Were Terminated or Non-selected in eRPS

Description	Beneficiaries	Payments
Sample Results	12	\$380,408
Point Estimate	26,912	\$853,118,197
Projection – Lower Limit	15,863	\$271,366,388
Projection – Upper Limit	41,971	\$1,434,870,006

Note: All statistical projections are at the 90-percent confidence level.

Table B-4: Annual Estimate for Terminated or Non-selected Representative Payees

Description	Beneficiaries	Payments
Sample Results	12	\$84,548
Point Estimate	26,912	\$189,611,624
Projection – Lower Limit	15,863	\$84,342,664
Projection – Upper Limit	41,971	\$294,880,583

Note: All statistical projections are at the 90-percent confidence level.

SSA Did Not Retain Applications for Representative Payees Who Did Not Have an SSN

Of the 100 beneficiaries in our sample, SSA did not retain a copy of the application for 10 representative payees who did not have an SSN. For nine beneficiaries, the representative payees did not have an SSN recorded on the MBR/SSR because they were undocumented noncitizens, and SSA did not follow its policy to retain the payee application. For the remaining beneficiary, we could not determine whether the representative payee had a valid SSN. The representative payee’s SSN was not recorded on the MBR/SSR, SSA did not retain the payee application, and we could not determine whether the individual was an undocumented noncitizen. None of these representative payees were in eRPS.

As of September 2016, SSA had paid these representative payees \$467,608. Projecting these results to our population, we estimate SSA paid about \$1 billion to the representative payees for 22,426 beneficiaries from April 2006 to September 2016. Furthermore, unless it takes corrective action, we estimate SSA will pay about \$182.5 million in benefits, annually, to representative payees who do not have an SSN or paper application supporting their selection.

Table B-5: Representative Payees Who Had No SSN and Application

Description	Beneficiaries	Payments
Sample Results	10	\$467,608
Point Estimate	22,426	\$1,048,676,553
Projection – Lower Limit	12,396	\$436,173,961
Projection – Upper Limit	36,712	\$1,661,179,146

Note: All statistical projections are at the 90-percent confidence level.

Table B-6: Annual Estimate for Representative Payees Who Had No SSN and Application

Description	Beneficiaries	Payments
Sample Results	10	\$81,385
Point Estimate	22,426	\$182,516,628
Projection – Lower Limit	12,396	\$89,421,871
Projection – Upper Limit	36,712	\$275,611,386

Note: All statistical projections are at the 90-percent confidence level.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: January 31, 2017 **Refer To:** S1J-3

To: Gale S. Stone
Acting Inspector General

From: Stephanie Hall /s/
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, “Individual Representative Payees Who Do Not Have Social Security Numbers Recorded on the Social Security Administration’s Payment Records” (A-09-16-50159)--INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,
“INDIVIDUAL REPRESENTATIVE PAYEES WHO DO NOT HAVE A SOCIAL
SECURITY NUMBER IN THE SOCIAL SECURITY ADMINISTRATION’S PAYMENT
RECORDS” (A-09-16-50159)**

GENERAL COMMENTS

Representative payees play a significant role in many beneficiaries’ lives. We have approximately 5.7 million representative payees managing annual benefits for approximately 8 million beneficiaries. When appointing representative payees, we adhere to guidance in the *Social Security Act* (the Act). Specific to this audit, the Act permits us to appoint, in certain circumstances, an undocumented alien, or applicant who resides outside the United States without a Social Security number (SSN) to serve as payee. Specifically, the Act states we should verify a person’s SSN (or employer identification number) in our investigation of the payee applicant. However, the Act does not state that the applicant must have an SSN to serve as a payee. The Act lists the criteria that prevent an individual from serving as a payee and the absence of an SSN is not a criterion preventing an individual from serving as payee.

We have taken steps to update our policy, improve our business processes, and make systems enhancements to ensure accurate payments to all beneficiaries and representative payees. We have transitioned from storing documentation in paper folders to uploading to a Certified Electronic Folder. OIG’s estimated 26,912 beneficiaries who were terminated or not selected, according to our Representative Payee System (RPS), were payees selected prior to April 2016, and before the release of our new Electronic Representative Payee System (eRPS). The discrepancies of representative payee data with our payment system data during the transfer from RPS to eRPS may have resulted in applications showing as terminated or not selected. We recognized the synchronization issue and designed our new eRPS system to centralize representative payee information and give our employees nationwide access to the same payee information. Further, we note that the audit did not find any of the payees incapable of managing benefits.

In summary, the new eRPS system allows our employees to document information on every representative payee with a valid SSN. In addition, eRPS generates an alert when the payment record shows a payee change not documented within eRPS. This mechanism helps ensure that we have the proper documentation for each representative payee on both of our payment records, the Master Beneficiary Record (MBR)/Supplemental Security Record (SSR). In addition, with the implementation of eRPS, alerts are generated whenever eRPS receives a record from the MBR or SSR and it does not have an associated application in eRPS or the representative payee’s SSN on the application does not agree with our payment system.

Below are our responses to the specific recommendations.

Recommendation 1

Take appropriate action for the 77 beneficiaries whose representative payees' SSN are not on the MBR/SSR, as identified by our audit.

Response

We agree.

Recommendation 2

Evaluate the results of its actions for the 77 beneficiaries and determine whether it should review the remaining population of 224,164 beneficiaries we identified.

Response

We agree.

Recommendation 3

Improve controls to ensure (a) it records representative payees' SSNs on the MBR/SSR and (b) its systems generate alerts when there is a discrepancy between representative payee information in eRPS and the MBR/SSR.

Response

We agree. In addition to considering your recommended controls, we are currently developing requirements for new functionality within eRPS that will include a monthly review of those applications ready for processing. The system will compare the representative payees' SSN to the associated record on the MBR/SSR. If there is no match, eRPS will generate an alert for action.

MISSION

By conducting independent and objective audits, evaluations, and investigations, the Office of the Inspector General (OIG) inspires public confidence in the integrity and security of the Social Security Administration's (SSA) programs and operations and protects them against fraud, waste, and abuse. We provide timely, useful, and reliable information and advice to Administration officials, Congress, and the public.

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