

# **Reduction in Face-to-Face Services at The Social Security Administration**



*United States Senate  
Special Committee on Aging*

Summary of Committee Staff Investigation

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## **Executive Summary**

From a customer service perspective, the Social Security Administration (SSA) has set a standard for superior customer service among governmental agencies. It has historically received high marks from beneficiaries, and most Americans do not have to travel far to reach a SSA field office, where they can apply for benefits, become a representative payee for someone incapable of managing his or her finances, or apply for a name change after marriage.

Yet continuing budget constraints, which began at the start of the decade, have forced SSA to make difficult decisions to reduce service to the public. At a time when Baby Boomers are retiring and filing disability and retirement claims at record numbers, SSA has shed 11,000 workers agency-wide over three years. Hiring freezes resulted in disproportionate staffing across the nation's 1,245 field offices, with some offices losing a quarter of their staff. These past five years have also served witness to the largest five-year decline in the number of field offices in the agency's 79-year history as 64 field offices have been shuttered, in addition to the closure of 533 temporary mobile offices known as contact stations. SSA has also reduced or eliminated a variety of in-person services as it attempts to keep up with rising workloads and shift seniors and others online to conduct their business.

Committee staff has spent seven months examining the impact and rationale behind these service cuts, examining all documented and available written justifications for field office closures since 2010. SSA reported to Congress last month that it examines six major factors before determining whether to close a field office. Our conclusion: on four of these six metrics, the data the agency has compiled to justify its closures are incomplete or insufficient, and ultimately SSA has no clear way to compare offices against each other and determine which offices are most needed by the American public. In addition, the review found SSA:

- Rarely surveyed what would happen to a community if an office closed there and failed to detail any remaining or transition services that would be available;
- Rarely assessed whether those impacted by the closures even had Internet access to conduct business with the agency online;
- Rarely examined the impact of closures on staff in the closed office or nearby offices or analyzed which neighboring offices would see an increase in traffic; and
- Failed to consult any local stakeholders and minimally consulted local agency management until after the Commissioner agreed to close a field office.

In light of these shortcomings, Committee staff recommends that SSA, in consultation with its staff, local managers and Congress, should create a more comprehensive and uniform consolidation policy that would enable the agency to: collect better data to inform decision making; be transparent and include stakeholders in the process, and build in transition time and alternative services before closing any additional field offices.

## **I. Budgetary History, Staffing and Service Reductions**

### **I-A: Field Offices and History of Face-To-Face Service**

SSA began opening field offices within a year of passage of the Social Security Act,<sup>1</sup> with the first field office opening in Austin, Texas, in October 1936.<sup>2</sup> Over the years, these field offices have been known for providing highly regarded customer service. SSA office visitor satisfaction surveys from Fiscal Year (FY) 2003 through FY 2011 show roughly nine out of every 10 visitors were pleased with his or her visit.<sup>3</sup> Across government, SSA has consistently scored higher than average and is often among the top agencies in the American Customer Satisfaction Index.<sup>4</sup>

Americans can walk into a field office or make an appointment with SSA's highly trained staff, which will help them consider a variety of options involving complex and complicated decisions, such as when and how to file and claim retirement or disability benefits, Medicare or Supplemental Security Income (SSI).<sup>5</sup> Field office workers understand all the nuances in agency rules and can provide insight into what information is relevant for a disability claim or when best to claim retirement benefits, for example.

Agency guidance requires face-to-face interviews for situations in which a determination must be made about a beneficiary's capacity to manage his or her finances, applications for an original Social Security Number (SSN), and certain fraud and SSI cases.<sup>6</sup> SSA also outlines a variety of other situations in which a face-to-face interview may be necessary, including complex issues, cases involving significant amounts of evidence and cases in which the visitor "has difficulty communicating over the telephone, understanding the documented program explanations or does not have access to the Internet."<sup>7</sup>

SSA served more than 43 million visitors in FY 2013<sup>8</sup> at its field offices, which range in size and function.<sup>9</sup> SSA reports a wide range in field office traffic from office to office; nearly three-quarters of field offices see between 50 and 199 visitors a day.<sup>10</sup>

SSA does not collect demographic data on the income level or ethnicity of its visitors, although it does collect age, finding that those 60-69 represent the single largest age category of visitors.<sup>11</sup> SSA

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<sup>1</sup> P.L. 74-271

<sup>2</sup> SSA Office of Retirement and Disability Policy, "[Administering Social Security: Challenges Yesterday and Today.](#)" page 30, 2010.

<sup>3</sup> SSA, "[Program Evaluations.](#)" page 7, 2011.

<sup>4</sup> In 2001, SSA scored an average of 84 compared to an average of 71 across government. In 2007, SSA scored a 72, compared to average score of 68 among all federal agencies. In 2013, SSA scored a 70, just above the federal average of 66. American Customer Satisfaction Index, "[ACSI Federal Government Report 2013: Decline in Citizen Satisfaction and Diminished Trust for Federal Government Amid Problems with Websites.](#)" January 2014; American Customer Satisfaction Index, "[ACSI Benchmarks for US Federal Government 2001.](#)" December 2001; American Customer Satisfaction Index, "[ACSI Commentary: Federal Government Scores – Dec 2007.](#)" December 2007.

<sup>5</sup> See Appendix A – List of Major Services at Social Security Field Offices

<sup>6</sup> SSA, "[Program Operations Manual System \(POMS\) GN 00203.003A](#)

<sup>7</sup> SSA, "[Program Operations Manual System \(POMS\) GN 00203.003B](#)

<sup>8</sup> SSA, "[Justification of Estimates for Appropriations Committees Fiscal Year 2015](#), p. 9

<sup>9</sup> The largest offices are Level 1 offices, and smaller satellite offices are known as Level 2 offices. In addition, SSA has resident stations, very small offices with limited services in remote locations, and card centers, which are centralized processing sites for all Social Security Number applications for area residents.

<sup>10</sup> SSA reports that 4 percent see 300 or more visitors, 14 percent see between 200 and 299 visitors, 38 percent see between 100 and 199 visitors, 33 percent see between 50 and 99 visitors, and 11 percent see under 50 visitors.

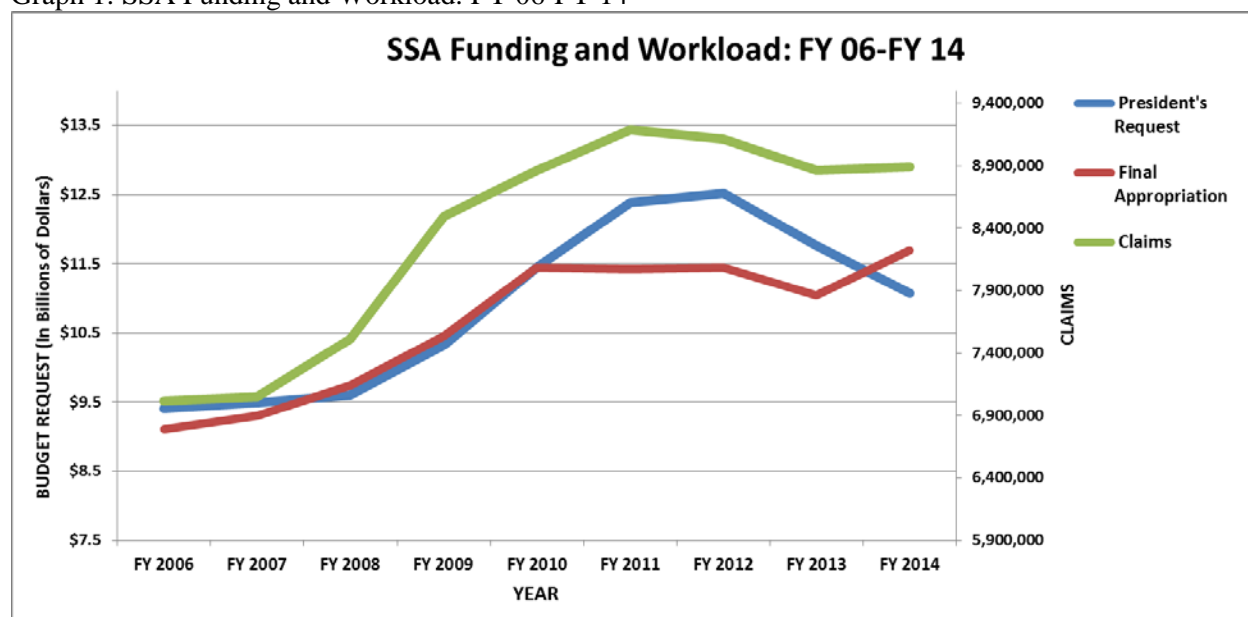
<sup>11</sup> Roughly one quarter of visitors is between 60 and 69, although 65 percent of visitors are under 60.

workload data provides a picture of field office clientele; among the top reasons a person walks into a field office is to obtain a benefit verification letter, which is often used to qualify for public assistance.<sup>12</sup> This would suggest that a significant portion of visitors are of limited means; advocates for this community consistently note how important in-person visits are to those needing to maintain eligibility for a variety of assistance programs.

### I-B: Reduced Funding and Staffing

SSA is subject to annual congressional appropriations for its operating costs, known as Limitation on Administrative Expenses (LAE).<sup>13</sup> From FY 2000 until FY 2010, Congress annually appropriated funds representing at least 97 percent of the president's request.<sup>14</sup> However, funding dipped from FY 2011 to FY 2013, remaining flat in actual dollars and diminishing as an overall percentage of the president's request. In total, SSA received \$2.7 billion less than the president sought during the three-year window. Although the agency received a funding increase in FY 2014, that increase was primarily restricted to program-integrity activities, while funding for SSA's regular operations only received a small increase.

Graph 1: SSA Funding and Workload: FY 06-FY 14



Source: SSA, CRS<sup>15</sup>

The three previous years of low funding, combined with a wave of retirements and a hiring freeze that has been in place since 2010,<sup>16</sup> led to a reduction in staffing throughout SSA's operations. At the beginning of FY 2011, 29,481 full time employees worked in SSA field offices; by January 2014, this

<sup>12</sup> For further discussion on benefit verification letters, see Section C.

<sup>13</sup> Unlike most agencies that are funded through general revenue, SSA can access its trust fund, the Medicare trust fund, general revenue and other fees; the LAE, therefore, is a limitation Congress places on how much money the agency can use from these sources on administrative expenses. Congressional Research Service (CRS), "[Social Security Administration \(SSA\): Budget Issues.](#)" page 4, March 2013.

<sup>14</sup> CRS, "[Social Security Administration \(SSA\): Budget Issues.](#)" page 14, January 11, 2011.

<sup>15</sup> Claims data includes initial retirement, survivors, disability and Medicare claims and pending initial disability and disability claims for which the agency did not have the budget to process.

<sup>16</sup> GAO, "[Social Security Administration: Long-Term Strategy Needed to Address Key Management Challenges.](#)" page 8, May 2013.

number had fallen to 25,420, a decrease of nearly 14 percent, according to the National Council of Social Security Management Associations (NCSSMA). Furthermore, attrition throughout SSA has not been even, “creating severe staffing shortages in some places.”<sup>17</sup> According to NCSSMA, about one-quarter of all field offices have lost at least 20 percent of their workers.

The staffing shortages have come at a time when the agency’s “demands for services are as high as they have ever been,” due in large part to the waves of Baby Boomers reaching their most disability-prone years and later hitting retirement age.<sup>18</sup> SSA reports a 33 percent increase in retirement and survivor claims from FY 2007 to FY 2014.<sup>19</sup> This trend will continue for the foreseeable future; by 2030, all of the Baby Boomers will have reached 65 and will comprise more than 20 percent of the total U.S. population.<sup>20</sup>

### I-C: Reduced Services

Given the aforementioned budget shortfalls, SSA has made tough decisions that have impacted all of its operations, including service in field offices.

#### Reduced Hours and Increased Wait Times

Since 2011, SSA has reduced the time its field offices are available to the public by the equivalent of one full day a week. Starting in August 2011, the agency announced that all field offices would close a half-hour early to ensure staff could process applications and finish other work without incurring overtime costs.<sup>21</sup> In November 2012, the agency once again reduced weekday hours by an additional half hour.<sup>22</sup> Starting in January 2013, the agency closed all field offices to the public at noon on Wednesdays.<sup>23</sup>

The impact of these service reductions has been felt in field office waiting rooms and on the phone. In March 2013, SSA estimated that in a single week nearly 12,000 visitors to field offices would have to wait over two hours to be served, a figure that had almost tripled in the previous four months.<sup>24</sup> Between FY 2010 and January of FY 2013, the average wait time for field office visitors without appointments increased by 40 percent.<sup>25</sup> NCSSMA reports that in FY 2013, the percentage of visitors who waited over three weeks for an appointment was over 43 percent, compared to only 10 percent a year earlier. According to NCSSMA, as of early 2014, the average wait time for visitors to SSA’s field offices was 31.5 minutes, an all-time high and 240 percent longer than it was three years ago.

From FY 2011 to FY 2013, the agent busy rate experienced by callers to SSA’s 800-number increased from 3 percent to 12 percent, with SSA projecting that in FY 2014, 14 percent of callers would get a busy signal when they tried to call.<sup>26</sup> In the beginning of FY 2014, 800-number callers who were

<sup>17</sup> Social Security Advisory Board, [“2012 Annual Report of the Social Security Advisory Board,”](#) p. 7, August 2013.

<sup>18</sup> SSA Office of Inspector the General, [“IG Statement on SSA’s Major Management and Performance Challenges,”](#) page 9, December 2013.

<sup>19</sup> CRS compilation of SSA data

<sup>20</sup> U.S. Census Bureau, [“The Baby Boom Cohort in the United States: 2010 to 2060,”](#) page 1, May 2014.

<sup>21</sup> SSA, [“Social Security Field Offices to Begin Closing to the Public a Half Hour Early: Congressional Budget Cuts Force Reduced Public Hours,”](#) July 2011.

<sup>22</sup> SSA, [“Social Security Field Offices to Close to the Public a Half Hour Early Each Day and at Noon on Wednesdays,”](#) November 2012.

<sup>23</sup> *Id.*

<sup>24</sup> SSA, [“Statement of Carolyn W. Colvin, Acting Commissioner, SSA before the House Committee on Appropriations Subcommittee on Labor, Health, and Human Services, Education, and Related Agencies,”](#) March 2013.

<sup>25</sup> *Id.*

<sup>26</sup> SSA, [“2013 Budget Overview,”](#) page 4; SSA, [“2015 Budget Overview,”](#) page 9.

able to get through were waiting an average of over 17 minutes – more than three times as long as the average waits of five minutes in FY 2012, according to NCSSMA.

### Benefit Verification Letters and SSN Printouts

In December 2013, SSA announced that it would no longer provide two services in field offices: benefit verifications and Social Security Number (SSN) printouts. The agency reports nearly 6 million people annually visit field offices to obtain the SSN printouts, which they typically use to verify their SSNs with prospective employers, a Department of Motor Vehicles or another third party.<sup>27</sup> SSA reports 5 million annual field office visitors seek a benefit verification letter to prove their income<sup>28</sup> or current Medicare health insurance status, retirement or disability status, or age.<sup>29</sup> Without these benefit verifications, many Americans cannot obtain or maintain critical housing and income support benefits.

In written responses to questions posed by the Committee, SSA contends that the foot traffic created by these visits can overwhelm a field office, and that by providing these services online and over the phone, it can free up staff to perform other core functions. In those responses, SSA Acting Commissioner Carolyn Colvin wrote that the purpose of the change is “not to save money.” In meetings with the Committee, SSA officials said the agency has spent the last several years working with federal, state and local agencies to create data exchanges, through which authorized entities can directly conduct benefit verifications without requiring a beneficiary to step foot into a field office.<sup>30</sup> The agency provides 1.6 billion of these exchanges today.<sup>31</sup> Beneficiaries can now also print out benefit verification letters through *my Social Security*, the agency’s online web portal,<sup>32</sup> or obtain them by mail if they call the toll-free number.<sup>33</sup> As for the SSN printouts, on more than one occasion, the SSA Office of Inspector General (OIG) has raised concerns about the controls for issuing them. These concerns stemmed from the printouts’ lack of security features, the number being issued, and their use for fraud.<sup>34</sup>

SSA first announced that it would implement these new policies starting in February 2014.<sup>35</sup> However, Congress required SSA to make SSN printouts available in field offices through at least July 31, 2014, and benefit verification letters available in field offices through at least September 30, 2014.<sup>36</sup> The report language noted concern about the adverse effect this policy change would have on people who are required to provide these documents.<sup>37</sup> Advocates have argued that the decision not to offer these documents in field offices could result in vulnerable groups facing excessive delays to obtain them, as benefit verification forms take five to seven business days for a senior to receive if he or she requests

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<sup>27</sup> SSA began issuing SSN printouts in 2002 for people who needed to prove they had a valid SSN but did not possess their original Social Security Card; at the time, they were seen as a safer alternative to a previously used document that contained additional personally identifiable information (PII) including the person’s date of birth, parents’ names and place of birth. SSA Office of Inspector General, [“Testimony of the Honorable Patrick O’Carroll, Jr., Inspector General, Social Security Administration Before the U.S. House of Representatives, Committee on Ways and Means, Social Security Subcommittee.”](#) April 15, 2010.

<sup>28</sup> Various entities seek proof of income, including loan and mortgage companies and agencies granting public assistance. Social Security Administration, [“Definition: my Social Security Benefit Verification Letter.”](#)

<sup>29</sup> *Id.*

<sup>30</sup> SSA, [“Social Security Field Service Changes Coming Later This Year.”](#)

<sup>31</sup> *Id.*

<sup>32</sup> SSA, [“My Account.”](#)

<sup>33</sup> SSA, [“my Social Security Information for Third Parties.”](#) Social Security Administration,

<sup>34</sup> SSA OIG, [“Controls for Issuing Social Security Number Printouts.”](#) . A-04-11-11105, pages 2-5, December 13, 2011.

<sup>35</sup> [“What’s New”](#)

<sup>36</sup> [2014 Joint Explanatory Statement to the Consolidated Appropriations Act](#), page 83.

<sup>37</sup> *Id.*

them via telephone, and new Social Security cards would take seven to 10 days to receive.<sup>38</sup> In the meantime, they argue, beneficiaries could be unnecessarily harmed, potentially losing their opportunity to receive public assistance or obtain employment due to the wait time.

Nonetheless, SSA is moving forward with its plans to discontinue in-person access for SSN printouts starting August 1, 2014, and for benefit verification statements effective October 1, 2014.<sup>39</sup> In its written responses to Committee questions, SSA has claimed it would provide these services in field offices in situations involving “immediate dire need,” such as “imminent eviction, emergency medical situations, and regionally or nationally declared disasters.” However, advocates are “concerned that many people with urgent needs will be left out.”<sup>40</sup> One letter to Colvin states: “We believe that the change will present an extremely difficult burden for all, but particularly the millions of Americans who lack computers, printers and computer expertise. Job seekers needing a Social Security Number to get hired may wind up not getting the job after all, because the employer is not willing to wait the time needed to get the documentation.”<sup>41</sup> Additionally, advocates expressed concern about low-income seniors’ ability to access the Internet to obtain benefit verification statements and frustration getting through to an operator on the telephone.<sup>42</sup>

SSA has told Committee staff that part of the rationale of setting a deadline is based on putting pressure on federal, state and local agencies to establish data exchanges with the agency if it has not done so already. However, advocates have expressed concern that such a shift in procedure will not occur as quickly as SSA is anticipating.<sup>43</sup> A consortium of disability groups notes that while it applauds the ultimate goal of reducing the burden on beneficiaries by promoting the data exchanges, the shift in policy for governmental entities “may also require significant procedural changes and staff retraining to alter decades of culture and practice at state and local agencies, which in many cases have for years placed the burden of providing this information on applicants for public services and benefits.”<sup>44</sup>

### Benefits Statement

The Social Security Act requires that SSA annually provide a benefits statement to people who have paid into the trust fund to show them their earnings information and projected benefits at retirement.<sup>45</sup> The Act also requires the agency to provide statements to those who request them.<sup>46</sup> The statement was the result of an effort by Senator Daniel Patrick Moynihan to inform the public about their expected benefits and allow them to ensure that SSA has correctly recorded their earnings, which SSA uses to compute the amount of an individual’s disability or retirement benefit.<sup>47</sup> Starting in 1999, SSA began providing these benefits statements to workers 25 or older every year.<sup>48</sup>

In March 2011, citing budgetary concerns, SSA suspended the annual mailing of benefits statements to 150 million workers, claiming that the action would result in \$30 million in savings for the

<sup>38</sup> [Letter to Commissioner Colvin from 24 advocacy groups](#), March 2014

<sup>39</sup> SSA, “[my Social Security Information for Third Parties.](#)” Social Security Administration, “[Important Information: Changes in Certain Services.](#)”

<sup>40</sup> [Letter to Commissioner Colvin from 24 advocacy groups](#), March 2014

<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

<sup>43</sup> Consortium for Citizens with Disabilities, [Letter to Commissioner Colvin](#), May 2014.

<sup>44</sup> Consortium for Citizens with Disabilities, [Letter to Commissioner Colvin](#), May 2014.

<sup>45</sup> Section 1143(c)(2) of the Social Security Act, 42 U.S.C. § 1320b-13(c)(2)

<sup>46</sup> Section 1143(a)(1) of the Social Security Act, 42 U.S.C. § 1320b-13(a)(1)

<sup>47</sup> SSA, [History of SSA 1993-2000](#).

<sup>48</sup> *Id.*



remainder of FY 2011 and about \$70 million annually moving forward.<sup>49</sup> The agency also stopped providing the statements in field offices and by request via its toll-free number.<sup>50</sup>

In December 2011, Congress asked the SSA commissioner “to examine a broad range of options for continuing to provide the information included in the annual statement to the public” and tasked the agency with producing a report no later than March 2012. SSA submitted its report in June 2012, explaining that it had resumed sending the statements to those 60 and older in February 2012, that it had made the statement available online in May 2012 and that it would resume sending the statement to workers at age 25,<sup>51</sup> which the agency began doing in July 2012.<sup>52</sup> In August and September of 2012, the agency also sent statements to 12.5 million Americans in order to spend around \$6 million in remaining funds in its FY 2012 budget.<sup>53</sup> However, on October 1, 2012, despite the new policy it explained to Congress in June, SSA again stopped mailing out paper benefit statements, citing budgetary concerns.<sup>54</sup>

In December 2013, the Social Security Advisory Board (SSAB),<sup>55</sup> heralding the statement as the agency’s “most direct and important means of communicating with the workers who pay the taxes needed to finance the Social Security system,” implored SSA to take additional steps to reach out to the public by informing them of the suspension of the mailings, reinstating more limited mailings or developing a less expensive alternative that can reach people who either don’t want to open an account with SSA online or don’t have direct Internet access.<sup>56</sup> In January 2014, Congress again directed SSA to develop a plan to significantly restore mailing the statements annually, either electronically or by mail.<sup>57</sup>

On March 20, 2014, SSA announced its plan to resume providing the statements in field offices and to resume mailing the statement to select workers, starting in September 2014.<sup>58</sup> Under this new plan, all workers who turn 25, 30, 35, 40, 45, 50, 55, and 60 in the upcoming year and who either do not currently receive benefits or are not registered for *my Social Security* will once again receive a mailed benefit statement.<sup>59</sup> The agency projects that in FY 2015, it will mail 43.5 million statements at a cost of \$21.75 million.<sup>60</sup>

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<sup>49</sup> SSA, [“Social Security Statement Review, A Report to Congress,”](#) June 2012.

<sup>50</sup> Social Security Advisory Board, [“SSAB Position Paper: The Online Statement And MySSA Portal: SSA Should Take Additional Steps To More Effectively Communicate With The Public,”](#) December 2013.

<sup>51</sup> SSA, [“Social Security Statement Review, A Report to Congress,”](#) June 2012.

<sup>52</sup> CRS, [Social Security Statements: Resumption of Paper Mailings,](#) May 2014.

<sup>53</sup> SSA noted in an Aug. 24, 2012, e-mail to congressional staff that it considered hiring staff to deal with rising workloads but opted not to do so because of FY 2013 budget uncertainty and a concern that “we don’t know whether we will be able to afford to keep these new hires next year.”

<sup>54</sup> Los Angeles Times, [“The stealth attack on Social Security gains ground,”](#) October 10, 2012; Federal Times Blogs, [Mailings of Social Security Benefits Statements Suspended \(Again\),](#) October 15, 2012.

<sup>55</sup> SSAB is an independent, bipartisan board created by Congress and appointed by the President and the Congress to advise the President, the Congress, and the Commissioner of Social Security on matters related to the Social Security and Supplemental Security Income programs.

<sup>56</sup> SSAB, [“Position Paper: The Online Statement And MySSA Portal: SSA Should Take Additional Steps To More Effectively Communicate With The Public,”](#) December 2013.

<sup>57</sup> [2014 Joint Explanatory Statement to the Consolidated Appropriations Act](#)

<sup>58</sup> SSA, [Letter from the Commissioner to the Honorable Barbara Mikulski,](#) March 20, 2014.

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

## II. Internet Services

### II-A: Social Security Internet Options

In recent years, SSA has expanded the options for individuals to file for certain types of benefits and interact with the agency online. Online disability applications began in 2008 with the launch of iClaim, which has since expanded to allow those eligible for Medicare or Social Security benefits (disability or retirement) to apply online.<sup>61</sup> Nearly half of all retirement applications were filed online in FY 2013, up from 6 percent 10 years earlier.<sup>62</sup> In addition, 45 percent of disability applications were filed online in FY 2013.<sup>63</sup>

On May 1, 2012, SSA unveiled *my Social Security*, allowing beneficiaries and workers to review their wages and other confidential Social Security information online.<sup>64</sup> In the years since, services have been expanded to allow beneficiaries to change their address and direct deposit information online and also print out a benefit verification letter.<sup>65</sup> Current workers can access the site to print out a copy of their online benefit statement.<sup>66</sup>

Nearly 11 million Americans have created a *my Social Security* account, and roughly 40 percent of that population – or 4.4 million people – are age 62 or older. Anyone age 18 or older is eligible to create an account, meaning that roughly 4.5 percent of the eligible population has created a *my Social Security* account and almost 9 percent of the population aged 62 or over has created an account with SSA.

### II-B: Limitations of Online Options

Although the number of seniors online is increasing dramatically, a sizeable portion of the older population does not use the Internet. Earlier this year, the Pew Research Center released data on Internet usage and access among older Americans.<sup>67</sup> The study found that 41 percent of adults age 65 or older do not use the Internet, and 53 percent do not have access to broadband at home.<sup>68</sup> Among those 80 years of age or older, the usage and access rates are much lower: 63 percent do not use the Internet and 79 percent do not have access to broadband at home.<sup>69</sup>

Seniors face unique barriers and challenges when it comes to their ability to use the Internet. For example, 23 percent of older adults indicate that they have a “physical or health condition that makes reading difficult or challenging.”<sup>70</sup> Additionally, seniors express that they face difficulties when it comes to their ability to navigate the Internet on their own. For example, even among seniors who do use the Internet, 56 percent indicated that they would need assistance if they wanted to learn to use social networking sites.<sup>71</sup>

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<sup>61</sup> SSA, [“Testimony of Commissioner Michael Astrue before the House Ways & Means Subcommittee on Social Security,”](#) April 15, 2010.

<sup>62</sup> SSA, [“Report on Policies and Procedures for Closing and Consolidating Field Offices,”](#) May 12, 2014.

<sup>63</sup> *Id.*

<sup>64</sup> SSA, [“Service Delivery Plan,”](#) page 10, February 2013.

<sup>65</sup> SSA, [“Press Release: Social Security Announces New Online Services Available With a my Social Security Account,”](#) January 2013.

<sup>66</sup> *Id.*

<sup>67</sup> Pew Research Center, [“Older Adults and Technology Use,”](#) April 2014.

<sup>68</sup> *Id.* at 1.

<sup>69</sup> *Id.* at 7.

<sup>70</sup> *Id.* at 11.

<sup>71</sup> *Id.* at 12.

Internet usage is also lower in rural areas and among seniors with lower levels of education and lower incomes. Among seniors who have not attended college, 60 percent do not use the Internet.<sup>72</sup> Among seniors earning less than \$30,000 annually, 61 percent do not use the Internet.<sup>73</sup> When compared with the general population, adults in rural areas use the Internet at a rate that is 30 percent less than the usage rate of the overall adult population.<sup>74</sup>

In addition to users who do not feel comfortable using the Internet or do not have access, another significant percentage of the senior population faces difficulty using SSA's web portals. For example, after tens of thousands of Americans reported potentially fraudulent creation of *my Social Security* accounts,<sup>75</sup> SSA implemented stricter security measures on its *my Social Security* portal.<sup>76</sup> While the necessary security measures likely blocked fraudulent users from signing up for accounts, they also resulted in the prevention of a large number of legitimate users from creating an account.<sup>77</sup> This Committee held a hearing on this issue in June 2013,<sup>78</sup> and since that time the SSA OIG reports that allegations of fraud of dropped from an average of about 170 calls a day to an average of about 40 calls a day. Victims of identity theft or domestic violence may also be unable to create a *my Social Security* account online and, in such cases, must do so in a field office.<sup>79</sup> Finally, *my Social Security* is only fully available in English, thereby precluding those speaking any other languages from using the service.<sup>80</sup>

Online applications still have limitations and require significant office staff support. SSAB noted in its 2012 annual report that Internet claims frequently arrive incomplete, with one estimate noting as many as 95 percent of retirement and disability claims required some sort of field office follow-up.<sup>81</sup> In addition, SSA staff have told the Committee that disability claims filed in an office can benefit from simple observations made by field office workers, such as witnessing a person alleging a back ailment sitting in a chair for several hours straight or noticing that a person claiming one type of disability may, in fact, be flagged by a staffer for an additional impairment.

### **III. – Long-Term Planning and “Vision 2025”**

#### **III-A: Lack of Long-Term Planning**

SSA is currently operating under a short-term strategic plan for FY 2014 through FY 2018 that features as one of its objectives a desire to “develop and increase the use of self-service options.”<sup>82</sup> Nearly half of all retirement and disability applications now occur online, and the agency is poised to offer more services online, including requesting a replacement Social Security card.<sup>83</sup> SSA noted that it “will

<sup>72</sup> *Id.* at 7.

<sup>73</sup> *Id.*

<sup>74</sup> Pew Research Center, [“Who’s Not Online and Why.”](#) page 5, September 2013.

<sup>75</sup> U.S. Senate Special Committee on Aging, [“Testimony of SSA IG Patrick O’Carroll.”](#) pages 1-2, June 19, 2013.

<sup>76</sup> U.S. Senate Special Committee on Aging, [“Testimony of SSA Assistant Deputy for Operations Theresa Gruber.”](#) page 2, June 19, 2013.

<sup>77</sup> For security reasons, SSA prefers not to publicly share its security measures or the exact percentage of users rejected due to its security protocols, but the numbers are significant.

<sup>78</sup> U.S. Senate Special Committee on Aging, [“Social Security Payments Go Paperless: Protecting Seniors from Fraud and Confusion.”](#) June 19, 2013

<sup>79</sup> SSA, [“Who Can Create a my Social Security Account?.”](#) 2014.

<sup>80</sup> SSA informed Committee staff that limited Spanish services (a retirement estimator and a Medicare prescription drug assistance application) are available on *my Social Security* and Spanish services are used by only about 1 percent of *my Social Security* users.

<sup>81</sup> SSAB, [2012 Annual Report of the Social Security Advisory Board](#), page 6, August 2013

<sup>82</sup> SSA, [Agency Strategic Plan](#), page 10.

<sup>83</sup> *Id.*

continue to adjust our physical office structure to reflect our online service emphasis,” and several offices now feature computer kiosks for beneficiaries to use on their own or with staff assistance.<sup>84</sup> Although the agency recognizes “the importance of continuing to provide in-person service for those customers whose business with us requires it,” its short-term plan notes that because of the increased online services, “we will not need to maintain the current number of Social Security offices.”<sup>85</sup>

However, since 2000, the SSA OIG, Government Accountability Office (GAO) and the SSAB have criticized SSA for not developing a long-term plan to address technology changes, beneficiary needs and demographic shifts.<sup>86</sup> In 2011, the SSA OIG explained that the agency must develop a plan for how to deliver its services, “including what services customers will expect and how they will want services delivered.”<sup>87</sup> It implored the agency to establish timelines and performance metrics to ensure that its long-term goals were being met.<sup>88</sup>

Last year, SSAB declared that a “comprehensive strategic plan should be the highest priority for this administration,” noting that short-term plans issued since 2000 had not enabled the agency to proactively address issues such as field office closures and consolidations.<sup>89</sup> While explaining that many seniors would welcome or prefer to do business online, SSAB noted that “there will continue to be many persons who expect to interact with Social Security in person or by telephone.”<sup>90</sup>

### III-B: Vision 2025

Since Acting Commissioner Colvin took control of the agency in February 2013, she has begun to engage in long-term planning. SSA restored a long-term planning office that had been shuttered in 2008.<sup>91</sup> Although the agency decided not to move forward with the Service Delivery Plan it published in February 2013,<sup>92</sup> SSA contracted with the National Academy of Public Administration (NAPA) to devise “Vision 2025,” a long-range planning document examining issues including organizational structure, workforce capacity, electronic service delivery and physical infrastructure.<sup>93</sup>

The report, which SSA will use as it develops its own long-term planning document, will not be publicly released until the fall of 2014; SSA has not formally approved or adopted the NAPA plan. Draft

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<sup>84</sup> *Id.*

<sup>85</sup> *Id.*

<sup>86</sup> GAO, “[Service Delivery Plan Needed to Address Baby Boom Retirement Challenges](#),” pp. “[Service Delivery Plan Needed to Address Baby Boom Retirement Challenges](#),” GAO, pp. 23-24, January 2009; GAO “[Social Security Administration: Long-Term Strategy Needed to Address Key Management Challenges](#),” pp., “[Long-Term Strategy Needed to Address Key Management Challenges](#),” GAO, pp. 29-33, May 29, 2013; SSA OIG, “[Congressional Response Report: The Social Security Administration’s Customer Service Delivery Plan, A-07-11-01125](#),” July 29, 2011; SSAB, [Facing the Challenges -- Envisioning the Future -- Transition Document for SSA](#), page 1, July 2013.

<sup>87</sup> SSA OIG, “[Congressional Response Report: The Social Security Administration’s Customer Service Delivery Plan, A-07-11-01125](#),” page 6, July 29, 2011.

<sup>88</sup> *Id.*

<sup>89</sup> SSAB, [Facing the Challenges -- Envisioning the Future -- Transition Document for SSA](#), page 1, July 2013

<sup>90</sup> *Id.* at 2.

<sup>91</sup> SSA reported to GAO that it restored the Chief Strategic Officer position in early 2013. GAO, “[Social Security Administration: Long-Term Strategy Needed to Address Key Management Challenges](#),” pp. 32, 35, May 2013.

<sup>92</sup> SSA OIG, “[Fiscal Year 2013 Inspector General Statement on the Social Security Administration’s Major Management and Performance Challenges](#),” page 10, December 2013.

<sup>93</sup> NAPA, “[Work-in-Progress: Social Security Administration Developing a Long-Range Vision and High-Level Strategic Plan](#).”

versions presented to employee unions and organizations have been provided to the press,<sup>94</sup> and Committee staff has spoken to NAPA to confirm the contents of the drafts. One of the core recommendations of the draft document is that by 2025, SSA should “use online, self-service delivery as our primary service channel” and that in-person services be available “in very limited circumstances, such as for complex transactions and to meet the needs of vulnerable populations.” NAPA told Committee staff that the document incorporated feedback from all levels of SSA, and that it is intended to explore what the agency will look like in 11 years and will not include a blueprint of how to achieve those goals between now and then.

Several organizations representing Social Security employees who have seen the draft sharply rejected the draft version of the document and the premise that the agency should move toward offering the heavy majority of its services online. The president of the American Federation of Government Employees (AFGE) Council of SSA Field Operations, the union that represents most field office workers, wrote his members that the agency has always provided beneficiaries a choice as to how they conduct business and that the purpose of the plan is the agency’s desire to eliminate field office services and would result in the “virtual elimination of face-to-face community-based service.”<sup>95</sup>

NCSSMA, which represents the agency’s field office managers, also found the goal of delivering service primarily online as unrealistic in an 11-year window. “This may be a vision for 20-25 years from now, but not a realistic vision for 2025,” NCSSMA wrote in its critique to NAPA that it shared with Committee staff. NCSSMA noted that online services do not work for its most vulnerable clients and those who live in rural areas with limited access to the Internet, which it notes has not markedly changed in the last decade. NCSSMA also pushed back on the notion of reduced in-person services and expressed concern that this could result in certain members of the public needing to find third parties to help them conduct business they currently can do with the assistance of field office workers.

## **IV. Field Office and Contact Station Closures**

### **IV-A: Recent Closures**

In 1996, SSA reached its peak number of field offices – 1,352 – before a generally downward trend emerged in the intervening 18 years.<sup>96</sup> In fact, since FY 2010, SSA has eliminated 64 field offices, resulting in the largest reduction of field offices in any five-year span in the agency’s history. As of June 2014, 1,245 field offices are in operation.<sup>97</sup>

Since its earliest days, the agency has augmented permanent field offices with contact stations, mobile service units aimed at reaching remote communities.<sup>98</sup> In September 2008, SSA had 734 contact stations in operation.<sup>99</sup> However, since that time, SSA has eliminated the majority of its contact stations, closing 533 since 2010 alone. In a letter to the Committee, Colvin cited logistical difficulties for sending a permanent employee to another city that does not have the same support available in a permanent field office. The agency also contends “contact stations presented a risk for our employees” because they

<sup>94</sup> The Baltimore Sun, [“Union, Social Security at Odds Over Long-Term Vision,”](#) May 3, 2014; Federal Times, [“SSA Draft Vision Calls for Smaller Workforce, Fewer Offices,”](#) May 2, 2014.

<sup>95</sup> Social Security News, [“Vision 2025: A Society Where Most People Will Never Leave Their House Except to Be Entertained,”](#) April 28, 2014.

<sup>96</sup> SSA, [“Social Security History.”](#)

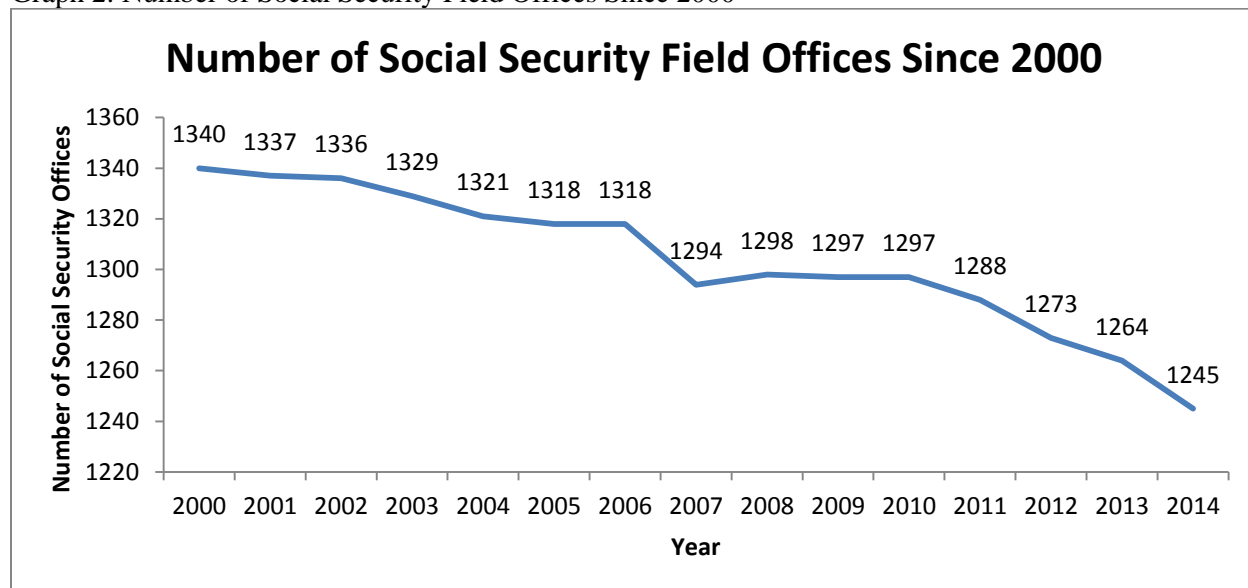
<sup>97</sup> This number includes Level 1 offices, Level 2 offices, resident stations and card centers.

<sup>98</sup> SSA Office of Retirement and Disability Policy, [“Administering Social Security: Challenges Yesterday and Today,”](#) 2010.

<sup>99</sup> GAO, [“Service Delivery Plan Needed to Address Baby Boom Retirement Challenges,”](#) page 7, January 2009.

“often served the public without a guard or another agency employee present, usually in an isolated area of a facility.” Finally, SSA contends contact stations are at risk for loss of personally identifiable information (PII) because the work there is done on paper.

Graph 2: Number of Social Security Field Offices Since 2000



Source: SSA

#### IV-B: Procedure for Closures

Prior to 2013, SSA’s formal process for field office closures and consolidations began at the local and regional level and was overseen by the agency’s 10 regional commissioners.<sup>100</sup> SSA conducted a service delivery assessment (SDA) of a field office once every five years, examining factors including workloads, local populations, demographic trends and area-specific factors that may impact staffing over a five-year period.<sup>101</sup> Such a review could be conducted more frequently due to “significant changes in workload, demographic, staffing or space considerations.”<sup>102</sup> Area managers were required to produce a recommendation, data analysis and discussion of the service area needs before clearly stating whether current service was adequate or a change to service levels was needed.<sup>103</sup> Area managers would review these recommendations before forwarding them to a regional commissioner for approval, who would then submit the recommendations for final sign-off to the Deputy Commissioner for Operations.<sup>104</sup> Once an office was scheduled for consolidation, SSA procedure required agency officials to inform elected officials and their staffs about the changes.<sup>105</sup>

In a letter to the Committee, Colvin wrote that she requested a review of its field office reviews and recently instituted a new procedure. She wrote: “The new process ensures a thorough review and documentation of all consolidations, including my personal review and approval.”<sup>106</sup> This new process

<sup>100</sup> SSA OIG, [“Congressional Response Report: The Social Security Administration’s Facilities Management.”](#) A-13-11-21110, Appendix G, November 2010.

<sup>101</sup> *Id.* at 6.

<sup>102</sup> *Id.*

<sup>103</sup> *Id.*

<sup>104</sup> *Id.*

<sup>105</sup> *Id.*

<sup>106</sup> Letter from Acting Commissioner Colvin to the Committee, April 23, 2014.

was first publicly explained in a May 12, 2014, report to Congress,<sup>107</sup> and SSA first instituted the consolidation process last fall.<sup>108</sup>

Under the new protocol, the agency's Area Directors, who oversee a grouping of field offices, initiate a review process every year and can flag field offices as subjects of Service Area Reviews (SARs), a comprehensive analysis of a field office that examines everything from office volume to nearby offices and area demographics. Reviews can also be triggered by the expiration of a lease, among other factors.<sup>109</sup> The 10 Regional Commissioners oversee the SARs before the Deputy Commissioner for Operations presents the closure recommendations to the Commissioner for her to approve. SSA wrote to Committee staff in an e-mail that "local managers may or may not be involved in the process," although NCSSMA, which represents the managers, told Committee staff that its members are minimally, if at all, involved in the new process and much less involved than they had been prior to the change in protocol. SSA wrote to Committee staff, explaining that the Area Director is "familiar with the entire service area" and that "our office management consults with stakeholders in their communities on an ongoing basis, so we are aware, at the outset, that these stakeholders will have an interest in maintaining a field office."

In the report to Congress, the agency laid out six major factors it considers before closing or consolidating field offices. They are:

- **Public and employee impact:** SSA says it considers "the special needs of the community" and whether those needs would be fulfilled by a field office, resident station or video unit. Under this factor, it also considers "the longest increase in travel time for the public."
- **Area demographics and office volume:** SSA says it evaluates changes in an area's population and its demographics, along with shifts in the "number of daily walk-in visitors, phone calls, and related workloads." This assessment also includes the age of the population and languages spoken.
- **Proximity to other offices:** SSA says it considers how far the closed or consolidated office is from surrounding offices.
- **Staffing:** SSA says that some offices with high rates of attrition may be subject to closure or consolidation because "changes in staff levels may occur disproportionately across the country, making it hard to provide acceptable service levels in some locations."
- **Service area geography:** SSA says it considers public transportation options, parking availability and other logistical barriers for the public, in addition to proximity to other public service organizations.
- **Lease expiration:** SSA says "it makes good business sense to evaluate the current office location whenever a lease is expiring." However, the agency also can break its leases, which it notes generally last for 10 years because "they tend to offer the best balance of cost savings and flexibility." The agency notes that the "average savings from recent field office closings have been about \$4 million over a 10-year period" for each field office closed.<sup>110</sup>

Two problems with the assessment process that have remained constant under both systems are its lack of community engagement and transparency. As far back as 1993, Senator Paul Sarbanes of Maryland criticized SSA's lack of public involvement on the floor of the Senate: "I am confident that

<sup>107</sup> The report was mandated by the [2014 Joint Explanatory Statement to the Consolidated Appropriations Act](#); SSA, "[Report on Policies and Procedures for Closing and Consolidating Field Offices](#)," May 12, 2014.

<sup>108</sup> Letter from Acting Commissioner Colvin to the Committee, April 23, 2014.

<sup>109</sup> The agency also cites "workload or population changes" and "health and safety issues" as triggers for review.

<sup>110</sup> SSA reports average annual rent savings per square foot is \$25.02, that the average square foot reduction per facility is 6,292 square feet, and that the average annual savings for guards is \$107,080.

many of my colleagues are aware of situations in their own states in which a service office was closed or downgraded without input from community groups and without adequate consideration of the public interest.”<sup>111</sup>

Those same concerns appeared across the country during the most recent round of closures. In Barstow, California, and Kingston, New York, local leaders passed resolutions criticizing SSA’s field office closures there, citing their concern, respectively, that the decision was “made without input from local government agencies and the public”<sup>112</sup> and “the Social Security Administration did not approach local government officials to discuss alternatives...before making this drastic decision.”<sup>113</sup> Congressman Paul Cook, whose district covers Barstow, complained of a process “shrouded in secrecy,”<sup>114</sup> and the city manager in Hugo, Oklahoma, where a field office closed in June 2013, said he first learned about the closure from reading about it in the newspaper.<sup>115</sup> In Philadelphia, so many people in the community did not know of the field office closure on the north side of town that the building’s landlord began handing out fliers informing them because lines of people formed outside the office weeks after service stopped.<sup>116</sup>

#### IV-C: Analysis of Field Office Closures

Committee staff found that the current process used to justify field office closures is insufficient and could not provide a decision-maker with data needed to make a sound decision to close an office. The main problem with the area reviews is that they rarely allow for comparisons because most of the reviews provide information on only one field office<sup>117</sup> and the information contained in the documents is not reported in a consistent manner.

Most troubling, however, is the lack of local involvement, as SSA’s new consolidation policy continues the exclusion of local stakeholders and additionally removes local management from the decision-making process, only informing them once a final decision has been made to close a field office. The documents highlight the agency’s inability to capture the complete picture of the role of a field office within a community without consulting those who live there.

Due to the general lack of transparency surrounding the consolidation process, advocates have advanced several theories as to why certain offices have been shuttered, ranging from offices with expiring leases to offices with high levels of retirements or staff attrition. None of those theories, however, was borne out in the documentation provided. More than half of the closed offices had over a year left on their leases. SSA closed offices with significant staff attrition, with no staff attrition, and with staff attrition similar to that agency-wide. In fact, it is hard to discern any overall trends underlying this

<sup>111</sup> U.S. Congress, [“Congressional Record Full Text for the 103<sup>rd</sup> Congress: Statements on Introduced Bills and Joint Resolutions \(Senate – November 19, 1993\).”](#) Page S16451, November 19, 1993.

<sup>112</sup> Desert Dispatch, [“Residents concerned about Social Security office closure.”](#) February 18, 2014; Desert Dispatch, [“Cook lobbying to stop closure.”](#) February 21, 2014.

<sup>113</sup> Ulster County, [“Ulster County Resolution No. 29: Opposing the Closure of the Social Security Office Located At 809 Grant Avenue in Lake Katrine, NY.”](#) January 30, 2014, passed 22-0.

<sup>114</sup> Desert Dispatch, [“Cook lobbying to stop closure.”](#) February 21, 2014.

<sup>115</sup> KXII News 12, [“Hugo city leaders appeal to Social Security Admin. to reconsider office closure.”](#) March 15, 2013.

<sup>116</sup> Philadelphia Daily News, [“Closure of North Philly Social Security office irks disabled residents.”](#) May 10, 2013.

<sup>117</sup> Specifically, only seven of the 25 reviews explicitly mentioned consolidation (Camden, South Carolina; Richmond, Virginia; Louisville West, Kentucky; Philadelphia, Pennsylvania; Bristol, Connecticut; Midland, Texas; and Redlands, California). Of those, just four contained an explicit comparison of the office to be closed with the office selected as the consolidated site. Others made cursory comparisons. For example, the Redlands-San Bernardino area review compared those offices on some aspects of performance. See Appendix B: List of Closures/Information Contained in Area Reviews.



most recent round of closures,<sup>118</sup> which raises questions as to whether SSA actually has criteria it consistently applies to decide office closures and whether it fully understands the impacts of the office closures on the communities they serve.

#### Methodology

Committee staff asked SSA for documents it used to justify field office consolidations from 2010 to the present. In response, SSA said it could provide documents only for 25 consolidations that occurred under the current Acting Commissioner's tenure, starting with closures in February 2013 up until April 2014. The agency explained to Committee staff that one of the reasons it created the new centralized SAR process was because it previously had no process for compiling and reporting area reviews.

Of the documents provided, staff received 19 Service Area Reviews (SARs), one memo reflecting the content of an SAR,<sup>119</sup> and five Service Delivery Assessments (SDAs). The SARs contain standard categories, including staffing, data, demographics, safety issues, and office performance data. The SDAs do not contain the same information as SARs.<sup>120</sup> Throughout the remainder of this document, we refer to both types of documents as area reviews unless a distinction is warranted.

Committee staff catalogued and recorded any information contained in the area reviews. However, because the reviews reported data in a variety of ways, staff found it necessary to consult outside sources, described later in this section, to supplement the area review data. Staff examined area reviews to see if they provided information about the six factors SSA said it uses to decide if an office should be closed.

#### IV-D: Results of Analysis

In applying SSA criteria to the area reviews, we concluded only two of the six were adequately addressed. In addition, staff developed a list of additional factors which seemed relevant to the decision to close an office, but which area reviews generally did not consider. We address each in turn.

##### Public and employee impact

Standard: *SSA says it considers "the special needs of the community" and whether those needs would be fulfilled by a field office, resident station or video unit. Under this factor, it also considers "the longest increase in travel time for the public."*

Staff Determination: **Not met.** SSA cannot fully understand a community's special needs without talking to members of the community and does not address how a consolidated office would support those needs. Additionally, the area reviews lack analysis of alternatives to closures.

SSA noted in its report to Congress that it will only talk to stakeholders after it has made a closure decision. Additionally, it has changed a process that used to rely on local management to weigh in with their thoughts on closures and consolidations. SSA rarely interacts with local management, who are likely to live in a community and know more about how its residents use the Social Security office, prior to making its decision. Without this input, it is difficult to understand how the agency can make decisions about the special needs of the community, and a review of the agency's assessments shows a lack of analysis of community impact of potential closures.

Special Needs of Community: All of the area reviews include information describing a community's special needs. Yet few if any of the documents discuss how a consolidated office would handle these needs. For example, the Amherst, New York, area review noted how the office served a large number of

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<sup>118</sup> See Appendix B: Attributes of 37 Counties Served by 25 Closed Offices for a sample of trends surrounding the most recent office closures

<sup>119</sup> The memo recommended closing Richmond West office in Virginia based on the service area review.

<sup>120</sup> SDAs do not contain staffing information, for example.

nursing homes and a substantial population of international college students who need SSNs for employment or SSN denial letters to obtain a driver's license. The reviews are silent as to how these nursing home communities or college students would be served by the new office in Buffalo, New York.

Of particular note are the select area reviews that discuss how vital a now-closed field office is to a community. For example, the area review for Louisville West, Kentucky, discusses its residents' preference for face-to-face interaction, the connections they fostered with staff at the office, and the office's importance to the local community. In response to these concerns, the accompanying recommendation to close the office says only that the community's needs would "be met without interruption."

Whether Community Needs Would Be Fulfilled by a Field Office, Resident Station or Video Unit: The area reviews do not discuss alternatives to a field office, such as a resident station or video unit.

Longest Increase in Travel time for Public: All but two area reviews provide information on distances between offices, but because area reviews rarely compare offices, it is difficult to know whether public transportation is available from the closed site to the consolidated site. In addition, even short distances could be burdensome for the aged, disabled, or poor who rely on public transportation.<sup>121</sup>

Employee Impact: Only seven area reviews contained evaluative statements regarding the closure's effect on employees. These area reviews most frequently addressed employees' commuting time or distance. Some addressed the availability and/or the added expenses of parking. Others addressed workload and leave flexibility, and voluntary transfers.

#### Area demographics and office volume

Standard: SSA says it evaluates changes in an area's population and its demographics, along with shifts in the "number of daily walk-in visitors, phone calls, and related workloads." This assessment also includes the age of the population and languages spoken.

Staff Determination: **Partially met.** Although SSA collects most of the data that would be needed to analyze an area's demographics, it does not do so in a consistent fashion, making it very difficult to compare offices against each other. SSA collects standard categories of performance data but has not articulated how performance levels are related to closures.

Population: All area reviews included information on their area's population and expected changes in the area. Across area reviews there were nine types of population-relevant information, but no area review included all types. Some area reviews reported total population, some reported total households, and some reported both. Area reviews usually gave growth projections for five-year spans, but one used a three-year span. Some area reviews reported projected changes for number of households; others did not. Among the offices closed, there was no clear directional trend for population growth.

Demographics: Area reviews contained a variety of demographic information, including automobile ownership, number of vehicles owned, age, education, labor force size and participation, gender, housing, race, and language. Area reviews again differed substantially both in the data collected and the manner in which it was presented. This made it difficult to array, consolidate, or understand the information.

Even in cases in which a majority of area reviews provided information on some demographic characteristic, the information was segmented in different ways. This was the case for both education attainment and age. Area reviews sometimes reported the average age, and other times the median age,

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<sup>121</sup> See "Service Area Geography" for a longer discussion of public transportation issues

but most often reported age ranges.<sup>122</sup> The problem was that the ranges used were not consistent, making it challenging to examine age in a meaningful fashion. More problematic was the handling of poverty. A little more than half of the area reviews reported poverty rates as the percentage of the local population with income below a threshold. Others reported the percentage of the local population that had certain income levels, for example, the percentage of the local population with income less than \$15,000.

Interestingly, in at least one case, area reviews for field offices closed in the same year relied on data from different years. The Philadelphia, Pennsylvania, and Chelsea, Massachusetts, field offices were both closed in 2013, but the area review for Philadelphia used demographic data from 2000, 2006 and 2011 while the Chelsea area review used demographic data from 2010 and 2013, plus projections for 2018.

Because the inconsistencies across area reviews made it difficult to easily understand how vulnerable a community might be, we collected data from other sources. These data would suggest many counties served by the closed office had significant needs.

Chart 1: Attributes of 37 Counties Served by 25 Closed Offices<sup>123</sup>

Population Attribute	Number of counties
County poverty exceeds state poverty	23
Elder poverty exceeded state poverty	12
Percentage of population receiving Social Security equaled/exceeded 16%	29
Percentage of population receiving Supplemental Security Income equaled/exceeded 6%	5

Shifts in the Number of Daily Walk-in Visitors, Phone Calls, and Related Workload: While SSA says it uses performance data in deciding which offices to close, the documents do not delineate any thresholds that would warrant an office closure. For example, offices were closed with average daily walk-in visitors as few as 21 and as many as 223. Similarly, percentage of claims filed via the Internet at closed offices ran from 12 to 64 percent.<sup>124</sup> Given the small number of closures in a given year, discerning a trend from this data is difficult. In addition, it is unclear what SSA does or would use as a comparison point in making closure decisions.

Language: Most area reviews identified the language needs of communities. Some, but not all, identified the percentage of the area population that spoke a given language. Seven area reviews identified the impact of the community's language needs on the office's ability to deliver services. Once again, however, the area reviews were silent on whether the consolidated offices could offer similar language services. In Chelsea, Massachusetts, and Midland, Texas, for example, area reviews made note of the

<sup>122</sup> For example, 1-10 years of age, 10-20 years of age, etc.

<sup>123</sup> To gather information on poverty and population, we used Census's "[American Fact Finder—Community Facts](#)". To gather information on receipt of Social Security and Supplemental Security income we used "[OASDI Beneficiaries by State and County, 2012](#)", and "[SSI Recipients by State and County, 2012](#)." We obtained 2012 county populations estimates from the Census Bureau's "[Quickfacts](#)." We used 16 percent and 6 percent as the threshold for Social Security and Supplemental Security Income, because this is the portion of the United States population that receives each, according to the most current Census data available. See "[Census: 49% of Americans Get Gov't Benefits; 82M in Households on Medicaid](#)," October 23, 2013. We could not determine the counties for Yauco, Puerto Rico. Because the area review listed cities served by the office, we used the cities. Our choice to use counties has a limitation. In some cases, closed area offices served a distinct county. In other cases, they served zip codes within a county and another office served other zip codes in the same county. In most cases, the area reviews did not allow us to know which the case was.

<sup>124</sup> This range represents disability claims filed via the Internet.

large number of Spanish speakers. Although almost all of Midland's staff and almost half of Chelsea's staff spoke Spanish, the area review for both offices did not describe whether the staff at the consolidated site spoke Spanish. The documents did not provide information on where staff actually transferred, the language abilities of existing staff at the consolidated site, and the language needs of clientele at that site, both before and after consolidation.<sup>125</sup>

#### Proximity to Other Offices

**Standard:** *SSA says it considers how far the closed or consolidated office is from surrounding offices.*

**Staff Determination:** **Met.**

The area reviews consistently identify the distance between one office and other offices including the consolidated site. Two area reviews lacked this information. Distances ranged from 1.4 miles up to 35 miles.

However, measuring just the distance between a closed office and a consolidated office does not fully capture the impact of a closure on the community. Many field offices, especially those serving rural populations, see visitors not just from the downtown area that houses the field office but in other parts of the county and even neighboring counties. The area review for Hugo, Oklahoma, for example, notes that the office is just 30 miles away from the consolidated office in Paris, Texas, but local media point out that this would result in a trip for some in outlying areas that could be 85 miles longer than a visit to Hugo.<sup>126</sup>

#### Staffing

**Standard:** *SSA says that some offices with high rates of attrition may be subject to closure or consolidation because "changes in staff levels may occur disproportionately across the country, making it hard to provide acceptable service levels in some locations."*

**Staff Determination:** **Not met.** SSA rarely discusses adequacy of staffing at either the closed office or the consolidated office.

Most of the documents we received did not make explicit evaluations about the adequacy of staffing at the offices closed.<sup>127</sup> Only six area reviews included an assessment of whether staffing at the office being closed was adequate or inadequate.<sup>128</sup> Of the six offices, four were characterized as understaffed and two were characterized as overstaffed.

At most closed offices, attrition does not appear extreme, relative to the levels of attrition across SSA.<sup>129</sup> According to AFGE, slightly over half of all SSA field offices experienced staff attrition at 10 percent or greater.<sup>130</sup>

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<sup>125</sup> This is particularly difficult to assess for the Chelsea closure because it consolidated into several other offices in close proximity.

<sup>126</sup> KXII News 12, "[Hugo city leaders appeal to Social Security Admin. to reconsider office closure.](#)" March 15, 2013.

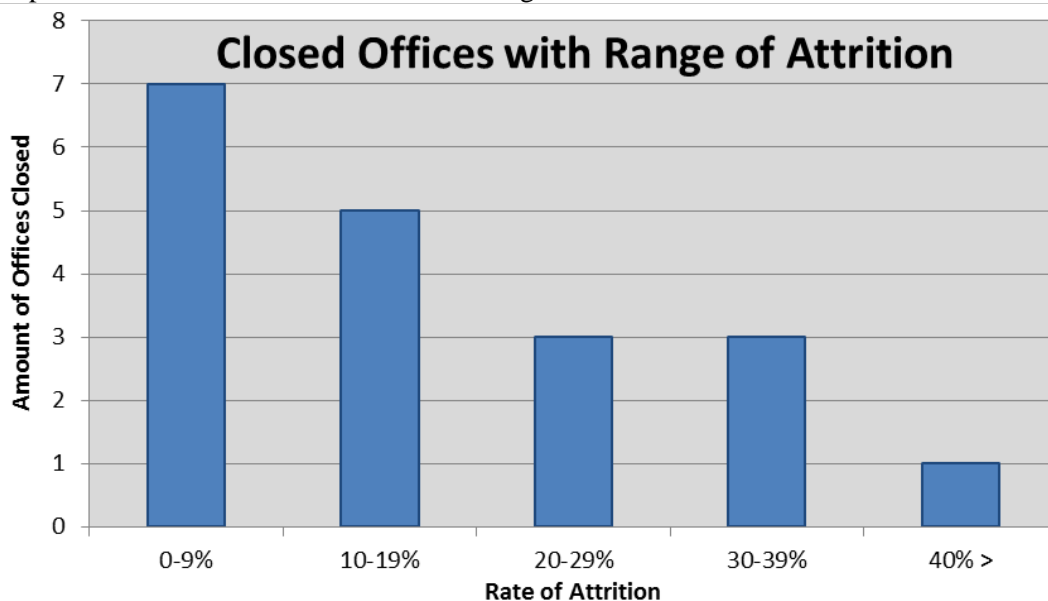
<sup>127</sup> While the SARs did provide information on staff attrition and staff eligible for retirement, the Service Delivery Assessments did not.

<sup>128</sup> One office mentioned moving workloads due to staffing "issues." Another mentioned emergency staff shortages. A third said training was making demands on staffing and that staff were finding it difficult to keep up the same level of service. Some area reviews mentioned attrition but not relative to other offices.

<sup>129</sup> Data were missing for the four SDAs. Bristol has no permanent staff.

<sup>130</sup> AFGE, [The State of Services: FY 2013 End-of-Year Report](#), September 2013.

Graph 3: Number of Closed Offices with Range of Attrition



AFGE sources told Committee staff that an office cannot really function with four or fewer staffers. Of the closed offices with data all but one had nine or more staffers. One had 40 staff members.

The percentage of staff retirement-eligible at closed offices seems to be in line with national trends. GAO estimated that about one-third of the federal workforce will be retirement-eligible by 2017.<sup>131</sup> Of the closed offices with data, 15 of 19 had staff eligible for retirement.<sup>132</sup> The percentage of retirement-eligible staff ranged from 0 to 64 percent, but with the exception of one office, one-third or less of staff were retirement eligible.

#### Service Area Geography

**Standard:** SSA says it considers public transportation options, parking availability and other logistical barriers for the public, in addition to proximity to other public service organizations.

**Staff Determination: Not met.** The majority of the reviews do not examine the accessibility of the consolidated offices from the communities serving the closed offices.

**Public Transportation and Parking:** Because the majority of area reviews do not compare the closed office and the consolidated site, it is difficult to see how SSA can use area reviews to consider public transportation options and parking availability relevant to the consolidation of one office into another. Even in the area reviews that describe multiple offices, including the consolidated site, it is difficult to determine what public transportation and parking at that site means for the community served by the closed office. Often, the area review notes the consolidated site has public transportation and “ample” parking but does not specify whether the public transportation includes the area served by the closed office or whether parking is “ample” enough to absorb new staff and clients. Here are a few examples that the area reviews did not consider:

- **Quincy, Florida:** There is virtually no public transportation from the area served by this office to the consolidated site in Tallahassee; a shuttle runs once daily from downtown Quincy, but it is generally packed with people commuting to work in Tallahassee, and even if a senior got on the

<sup>131</sup> GAO, “Federal Workforce: Recent Trends in Federal Civilian Employment and Compensation,” p. 19, Jan. 2014.

<sup>132</sup> Data were missing for the four SDAs. Bristol has no permanent staff.

shuttle, he or she would have to wait in Tallahassee all day until the evening shuttle arrived. The area review notes that Quincy has no public transportation. While it finds that Tallahassee has public transportation, that service covers Leon County, but Quincy is in neighboring Gadsden County.

- Barstow, California: The area review for Barstow notes that it has a bus “link” connecting it with the consolidated site in Victorville. However, it does not mention that the bus that travels the 35 miles between the two cities only runs three times a week.<sup>133</sup>
- Amherst, New York: Although it is only 9.2 miles from the consolidated site in Buffalo, a person trying to get from the Amherst area to Buffalo would have to travel by bus, train and over a quarter-mile on foot during a trip that would take an hour each way.<sup>134</sup> The area review does not discuss public transportation in and around Buffalo, but it does note that the poorest parts of the community are relatively close to the Amherst office, which the agency closed.

Logistical Barriers: In those cases in which the area review discussed the office chosen as the consolidated site, the consolidated sites did not appear to pose logistical barriers, but at least two were notable. In one case, SSA chose to consolidate Somerset, Pennsylvania, a disability-accessible office, into Johnstown, Pennsylvania, which the area reviews noted was not accessible to people with disabilities. Johnstown had no parking of its own and featured a broken elevator. The area review detailed how Johnstown staff had to offer services in the building lobby for clients who could not navigate steps when the elevator broke. In another consolidation in Kentucky, SSA moved Louisville West into Louisville Downtown. The area review notes that this would require customers to enter a federal building and pass through a metal detector. Advocates for non-English speakers, the disabled, and poor have previously noted that security measures at federal sites can pose challenges for such clients, not to mention the idea that some people are coming to a field office to replace lost or destroyed identification.

Proximity to Other Public Service Organizations: The majority of the area reviews list social service organizations and most of those that do characterize the organizations’ impact on the office’s work.<sup>135</sup> However, none of the information provided indicates how these social service organizations would compensate for functions lost because of an office’s closure. For example, in Amherst, a non-profit human services agency that assists disabled people purposely moved into the same building as the field office.<sup>136</sup> The associated area review notes that the field office deals with the “very large and growing organization” almost daily, but does not discuss how its interactions would change with the closure. On the other end of the spectrum, struggling social service agencies faced problems not only with how to handle the closure but also increased demand. In Pittsburg, Kansas, Southeast Kansas Independent Living aided about 500 clients with its staff that shrunk from eight to one person.<sup>137</sup> That remaining employee expressed great concern about the clients’ ability to use online or even phone services and said the 70-mile roundtrip to the nearest office was difficult.<sup>138</sup> The corresponding area review for Pittsburg did not list this organization.

<sup>133</sup> *Desert Dispatch*, “[Social Security office consolidation, limited service irks locals.](#)” March 17, 2014.

<sup>134</sup> Congressman Brian Higgins, “[Press Release: Higgins Stands with Residents, Business and Non Profits Impacted by Proposed Shutdown of Amherst Social Security Office.](#)” January 31, 2014.

<sup>135</sup> SDAs list social service organizations but do not characterize their impact; seven SARs listed no social service organizations. The majority of social service organizations listed in the reviews are said to have a “minimal” impact in regard to the office functions.

<sup>136</sup> People Inc. helps manage the expenses of 900 Social Security beneficiaries, and the agency’s 200 employees that work out of that site worked with the Amherst field office on a daily basis. Congressman Brian Higgins, “[Press Release: Higgins Stands with Residents, Business and Non Profits Impacted by Proposed Shutdown of Amherst Social Security Office.](#)” January 31, 2014.

<sup>137</sup> *The Joplin Globe*, “[Decisions to close Social Security office in Pittsburg lambasted.](#)” November 5, 2013.

<sup>138</sup> *Id.*

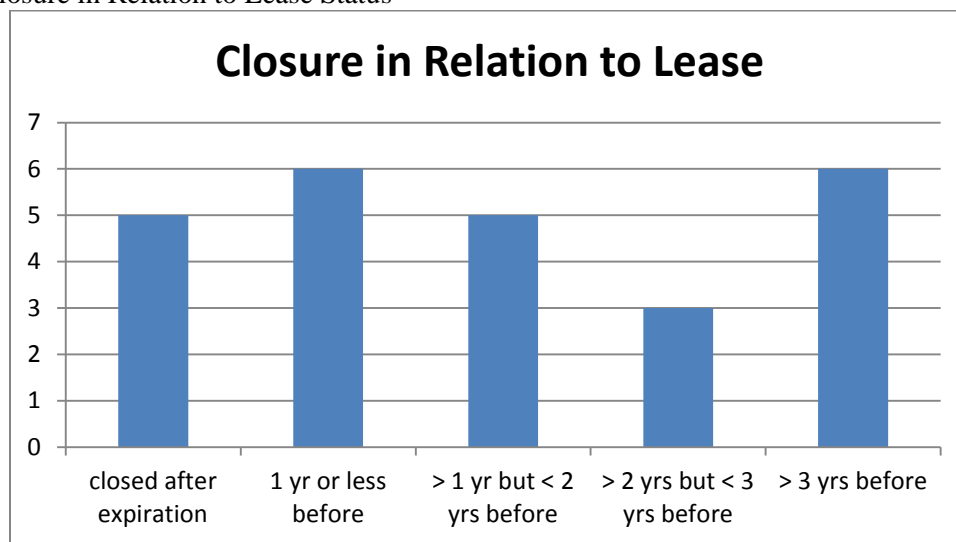
### Lease Expiration

Standard: SSA says “it makes good business sense to evaluate the current office location whenever a lease is expiring.” However, the agency also can break its leases, which it notes generally last for 10 years because “they tend to offer the best balance of cost savings and flexibility.” The agency notes that the “average savings from recent field office closings have been about \$4 million over a 10-year period” for each field office closed.

Staff Determination: **Met.**

The area reviews Committee staff examined do not appear to support the claim that SSA closes offices when leases expire. Instead, SSA closed a majority of offices well in advance of lease expirations. The figure below shows the breakdown for the lease status of office closures.

Graph 4: Closure in Relation to Lease Status



### Factors Not Considered by SSA

Our examination of area reviews allowed Committee staff to assess their value for gathering information relevant to the six factors SSA said it uses. In addition, it revealed other factors that would be important in deciding to close an office, but about which the area reviews were oddly silent.

- Where the Public Will Go: At least three area reviews included assessments of “Source of Work,” a test to see if an office serves clients mostly from its area and the predominant means of service.<sup>139</sup> This would seem to be one means of assessing the importance of host of variables, such as accessibility, language needs of the clients, and the appropriate mix of staff.
- Where Staff Will Go: While adequacy of staffing would be important in deciding to close an office, equally important would be another office’s ability to absorb those staff. However, only six<sup>140</sup> of the 25 area reviews addressed the other office’s ability to absorb consolidated staff. Beyond mentions of increased staffing flexibility, these assessments usually focused on space.

<sup>139</sup> Seven area reviews had Source of Work tables that were blank. For these cases, the analysis for Source of Work was characterized by the SARs authors as “None,” “Not Applicable” and “Has not been conducted.”

<sup>140</sup> These include Camden, Louisville, Philadelphia North Central, Redlands, and Richmond. The area review for Somerset never mentions consolidation but mentions available workspace at other offices in the area.

This leaves the question of how an influx of new clients would affect appointment wait times, phone busy rates, services to non-English speakers, and general levels of service at the consolidated site. It also raises questions about whether the combined staff would have the right configuration of skills.

- **Internet Access and Usage:** SSA's goal is to move services online but almost none of the area reviews included any assessment of a community's access to broadband services. A few said the "community has access to the Internet." Although each document included performance data on how many claims were filed via the Internet, those filings are not a proxy for both access to Internet services and ability and comfort using those services.
- **Physical Condition of the Building:** Although the agency says it considers the field office's lease terms, its official report to Congress does not include the physical condition of the building as a factor. Of the 25 offices closed, only nine area reviews described problems with the physical condition of the building. These varied in severity from mold that was not health threatening and was professionally eradicated (Maryville, Tennessee) to a building needing repairs that totaled \$1 million according to the area review (Pittsburg, Kansas).
- **Accessibility from the Closed Service Area to the New Service Area:** Given the large number of people who visit SSA offices who rely on public transportation, decisions to close an office should document the means, cost, and travel time for clients using public transportation from the most remote part of the closed office's service area to the consolidated site. Either the absence of public transportation or substantial driving distance to the new site should serve as a trigger for agency discussions about alternatives such as video conferencing services, which are discussed in the fourth recommendation. Discussions of parking at the consolidated site should address the additional number of cars that could be accommodated both for staff and clients and any costs for parking. Decisions to close an accessible office and consolidate it into a site that is not accessible to persons with disabilities should require a special justification and a contingency plan for addressing the needs of such clients.

#### IV-E: Recommendations

As SSA continues to examine the role of field offices as part of its service delivery, Committee staff believes the following recommendations would create a more effective strategy regarding office consolidations moving forward:

- 1) **SSA should create a uniform consolidation policy that delineates essential criteria for decision making.**

Congress, GAO and the SSA OIG have all encouraged SSA to improve its field office consolidation practice, and these recommendations are still outstanding.<sup>141</sup> In 2011, the SSA OIG encouraged the agency to consider best practices other agencies use to close physical infrastructure, noting that doing so could help the agency meet customers' expectations while still effectively managing resources.<sup>142</sup> A uniform system would allow the agency to more easily decide which offices to close and explain to the public that the decision was reached through a fair and thorough process.

<sup>141</sup> GAO, "[Social Security Administration: Long-Term Strategy Needed to Address Key Management Challenges.](#)" page 28, May 2013.

<sup>142</sup> SSA OIG, "[Congressional Response Report: The Social Security Administration's Customer Service Delivery Plan.](#)" A-07-11-01125, page 9, July 2011.



2) **SSA should use standard metrics of demographic variables included in area reviews.**

As our analysis shows, area reviews are not consistent in how they report on the standard categories. For starters, the agency should consider using agreed upon metrics for each category; poverty should always be reported using an accepted threshold, for example. A universal metric would allow the agency to accurately assess the clientele an office serves and compare across offices.

3) **SSA should expand the criteria it considers to more fully examine the impact of closures and consolidations on the affected communities.**

In addition to inconsistent metrics, SSA is still missing key categories that would help its leadership make an informed decision. Area reviews should consider (a) where the public will go; (b) where staff will go; (c) Internet access and usage; (d) physical condition of the building; and (e) accessibility from the closed service area to the new service area. Without such information it is difficult to know if and how a community's needs could be met at the consolidated site.

4) **SSA should include the public and other local stakeholders, including managers, employees, and elected officials in the decision-making process.**

If there is one common thread throughout the media coverage of field office closures, it is the anger and frustration displayed by impacted communities about not only the decision to close an office but the process through which the decision was made. SSA has been criticized for years concerning its unwillingness to engage the local community regarding potential consolidations. But in recent years the agency has actually moved toward an even more closed and internal decision-making process by rarely soliciting input from local management. If the agency were to actually engage others, it would be better equipped to make an informed decision. It is not enough for SSA to say that it recognizes a local community has an interest in keeping its field office; the point here is that the agency needs to understand the unique needs of a community, such as transportation problems or disadvantaged communities, and that the local stakeholders are often the best source of this information. This process would also allow SSA to explain to the public its difficulties in maintaining its existing level of service.

5) **SSA should incorporate transition planning for communities impacted by closures and consider alternatives to eliminating all in-person services.**

SSA should consider providing more public notice when reducing or eliminating services, including publicly advertising the change in the media and even sending postcards to frequent visitors. Too often, Committee staff has heard from community officials that they were given little advance time regarding field office closures. Furthermore, for every closure, the agency should at least explore options such as video conferencing that allow for some reduced level of service in the community. The longer transition period, mentioned previously, would give SSA time to acclimate communities to new types of service delivery. Finally, the agency could take more steps to consider alternatives such as colocation of services with other government entities, such as the U.S. Postal Service, as recommended by GAO and other watchdogs<sup>143</sup>—while keeping in mind the public's ability to access a building. Although SSA has introduced the idea of SSA Express, a collaborative effort with other government agencies and community organizations that would house self-service kiosks, this proposal would only be funded if Congress approved funding outside of the agency's base request.<sup>144</sup>

<sup>143</sup> U.S. Postal Service OIG, "[e-Government and the Postal Service-A Conduit to Help Government Meet Citizen's Needs](#)," January 2013; GAO, "[Federal Real Property: Strategic Partnerships and Local Coordination Could Help Agencies Better Utilize Space](#)," July 2012.

<sup>144</sup> SSA, [Justification of Estimates for Appropriations Committees Fiscal Year 2015](#), pp. 17-18

## **Conclusion**

The Social Security Administration has faced and will continue to face difficult budgetary decisions. It is beyond question that eliminating superfluous services, including certain field offices, makes sense for an agency looking for ways to serve more with less. However, it is also clear that the agency has not done enough to consider the impact of the decisions it has made in recent years on the people who rely on Social Security the most: the poor, disabled or otherwise limited elderly populations.

With regard to both the service cuts SSA is planning and the field office closures that have already occurred, these communities are too often left without the resources they need. Making matters worse, SSA's new process excludes both its own managers and the affected public. Given the agency's budgetary realities and the likelihood of additional field office closures and service cutbacks in the future, it is incumbent upon SSA to develop a more rigorous and transparent policy that is much more inclusive and thoughtful about the impacts on the communities it serves.

SSA has been criticized by a number of parties for its lack of long-term planning. With regard to planning, SSA will not only need to articulate a vision of where it needs to go—in order to balance increasing workloads and diminished funding and staffing—but also articulate actionable steps and a timetable for how it might arrive there. Planning alone will not solve all of SSA problems and examinations of both funding and management may be warranted.

## **APPENDIX A**

### **List of Major Field Office Functions**

- Applications for retirement benefits;
- Applications for disability insurance (DI);
- Applications for dependent claims, such as spousal, survivor or divorce benefits, or lump-sum death benefits;
- Applications for Supplemental Security Income (SSI);
- Applications for Medicare;
- Appeals of denials of disability benefits, SSI or Medicare Part D subsidies;
- Review of whether a beneficiary requires a representative payee, and evaluating, appointing and changing representative payees;
- Applications for original Social Security numbers, replacement cards, Social Security Number (SSN) printouts and changes to name, citizenship and work status;
- Correcting mistakes in earnings records;
- Requests for benefit verification statements;
- Appeals of Medicare income-related monthly adjustment (IRMA) determinations that result in higher Medicare premiums for high-income beneficiaries;
- Responding to individuals who receive notifications that they have been overpaid, including holding personal conferences and evaluating requests that repayment be waived;
- Direct deposit and mailing address changes;
- Receipt of death reports, work reports, and other post-entitlement changes that affect Social Security and SSI benefits;
- Reports of non-receipt of benefits and underpayments, and issuance of emergency payments when appropriate;
- Referrals for assistance from other community-based agencies and organizations; and
- Presentations to business, government and community organizations about Social Security, Medicare and SSI.

Source: AFGE

## APPENDIX B

Field Office Closures Under Acting Commissioner Colvin<sup>145</sup> and Information included in the Area Reviews

Closed	Date of closure	Consolidated into	Information about only closed office	Information about other area offices including consolidation site but no meaningful comparisons <sup>a</sup>	Recommendation or memo making comparison between closed and consolidation site.
Amherst, New York	4/25/2014	Buffalo, N.Y.	X		
Pittsburg, Kansas	11/15/2013	Joplin, Missouri	X		
Yauco, Puerto Rico	11/18/2013	Ponce, Puerto Rico	X		
Grand Central, New York	12/6/2013	Midtown, New York	X		
Bristol, Connecticut	1/31/2014	Hartford, Connecticut	X		
Williamsburg, New York	3/7/2014	multiple offices	X		
Kingston, New York	3/14/2014	Poughkeepsie, New York	X		
Bronx Hub, New York	3/28/2014	South Bronx, New York	X		
Midland, Texas	3/31/2014	Odessa, Texas	X		
Corona, California	3/31/2014	Riverside, California	X		
Chelsea, Massachusetts	9/24/2013	Multiple offices	X		
Bastrop, Louisiana	6/1/2013	Monroe, Louisiana	X		
Hugo, Oklahoma	6/1/2013	Paris, Texas	X		
Dallas West, Texas	4/19/2013	Multiple offices	X		
Houston Downtown, Texas	3/22/2013	Houston Southeast, Texas	X		
Somerset, Pennsylvania	3/21/2014	Johnstown, Pennsylvania		X	

<sup>145</sup> Colvin assumed her role on February 14, 2013

Closed	Date of closure	Consolidated into	Information about only closed office	Information about other area offices including consolidation site but no meaningful comparisons <sup>a</sup>	Recommendation or memo making comparison between closed and consolidation site.
Quincy, Florida	3/28/2014	Tallahassee, Florida		X	
Pinellas, Florida	3/28/2014	Multiple Offices		X	
Maryville, Tennessee	3/28/2014	Knoxville, Tennessee		X	
Barstow, California	3/29/2014	Victorville, California		X	
Redlands, California	3/29/2014	San Bernardino, California		X	
Philadelphia North Central, Pennsylvania	4/19/2013	Philadelphia Downtown, Pennsylvania			X
Camden, South Carolina	3/7/2014	Multiple offices			X
Richmond West, Virginia	3/7/2014	Richmond Downtown, Virginia			X
Louisville West, Kentucky	3/28/2014	Louisville Downtown, Kentucky			X

<sup>a</sup>These documents sometimes included cursory comparisons on performance data, population, workload, or staffing to workload. For example, the Barstow-Victorville area review notes that while staff decreased at Barstow, demand for services increased at Victorville.