



# DRC Working PAPER

WORKING PAPER NUMBER: 2018-06

---

## **A Qualitative Study of Employment Experiences of DI Beneficiaries after Receipt of an Overpayment**

---

December 2018

---

John Kregel\*

---

**\*Corresponding author's contact information:**

Virginia Commonwealth University  
Rehabilitation Research and Training Center  
Richmond, VA  
Email: [jkregel@vcu.edu](mailto:jkregel@vcu.edu)

Reference Number: 40112.D-MP-14-12

---

The research reported herein was performed pursuant to a grant from the U.S. Social Security Administration (SSA) funded as part of the Disability Research Consortium. The opinions and conclusions expressed are solely those of the authors and do not represent the opinions or policy of SSA or any agency of the Federal Government. Neither the United States Government nor any agency thereof, nor any of their employees, makes any warranty, expressed or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of the contents of this report. Reference herein to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise does not necessarily constitute or imply endorsement, recommendation or favoring by the United States Government or any agency thereof.

---

## **ABSTRACT**

---

### **Project Number**

D-MP-14-12

### **Title**

A Qualitative Study of Employment Experiences of DI Beneficiaries after Receipt of an Overpayment

### **Authors**

John Kregel, Virginia Commonwealth University

### **Date**

December 2018

### **Key Findings and Policy Implications**

The receipt of overpayments by large numbers of Social Security Disability Insurance (DI) beneficiaries is a major concern for beneficiaries, Social Security, and Congress. This study examined the effect of overpayments on the employment retention of working Social Security beneficiaries. Some researchers have argued that moving into overpayment status may have a negative impact on beneficiaries' efforts to maintain employment, although little is known about the employment behaviors of beneficiaries who experience overpayments. The qualitative study consisted of structured interviews with 84 DI beneficiaries who had previously received a notice of overpayment and were now attempting to return to work or maintain employment.

Experienced work incentive counselors who had direct knowledge of the beneficiaries' situations conducted the interviews. Although the interviewees were not representative of all beneficiaries with overpayments, their experiences are nonetheless instructive about the types of experiences such beneficiaries encounter as they pursue return to work.

Overpayment amounts ranged from a low of \$392 to a high of \$68,000. The mean overpayment was \$13,448 with a median of \$9,610. Fifty-five percent of respondents had overpayments of \$5,000 or more, with 25 percent receiving overpayments totaling over \$10,000. Over half of the respondents (51 percent) immediately terminated employment upon receipt of the notice. A large number of respondents reported that they were surprised that the overpayment occurred because they thought that they were following all the program rules. In most instances, they indicated that they were following the directions they received from Social Security employees. About 10 percent of the sample indicated that they had anticipated receiving an overpayment. A significant percentage of the respondents failed to accurately report earnings as required of DI beneficiaries. Some beneficiaries were clearly unaware of their reporting responsibilities, whether because they did not receive accurate information or they misunderstood the information that they were given. Other beneficiaries were aware of their responsibilities, but were not able to complete the required reporting responsibilities.

## TABLE OF CONTENTS

---

I.	INTRODUCTION.....	1
	A. DI program rules.....	1
	B. The magnitude of the overpayment.....	3
II.	DATA AND METHODS.....	5
	A. Sample.....	5
	1. Eligibility criteria for the ESA program.....	6
	2. Development of sample pool.....	6
	3. Sample characteristics.....	7
	B. Instrumentation.....	7
	C. Data Collection and Analyses.....	8
III.	RESULTS.....	9
	A. Employment status at time of overpayment notification.....	9
	B. Research Question 1. To what extent does receipt of an overpayment affect a beneficiary's subsequent work activity?.....	10
	C. Research Question 2. What factors contribute to the likelihood that a beneficiary received an overpayment?.....	12
	D. Research Question 3. To what extent are work incentives counseling services able to assist beneficiaries after an overpayment?.....	15
	1. Assisting beneficiaries to accurately report earnings.....	15
	2. Assisting beneficiaries to use work incentives to lessen the impact of the overpayment.....	16
	3. Assisting beneficiaries to communicate with Social Security.....	16
IV.	STUDY LIMITATIONS.....	17
V.	DISCUSSION.....	18
	A. No evidence of fraudulent activity.....	18
	B. Repayment requirements.....	18
	C. The role of work incentive counseling in mitigating the impact of overpayments.....	19
	D. Conclusion.....	20
VI.	REFERENCES.....	22

## **I. INTRODUCTION**

---

The Social Security Administration (Social Security) currently provides disability payments to 8.7 million working age Social Security Disability Insurance (DI) beneficiaries each month (Monthly Statistical Snapshot, July, 2017). The overwhelming majority of these payments are accurate, with 99 percent of DI payments free of overpayments (Colvin, January 24, 2012; Weaver, June 16, 2015). Despite the high accuracy rate, Social Security overpays a significant number of beneficiaries each month. In Fiscal Year 2015, Social Security recorded approximately \$1.2 billion in new DI overpayments. The agency also recovered \$857 million from over 300,000 beneficiaries, primarily by withholding some or all of their monthly benefit payment.

The rate of overpayments for Social Security disability beneficiaries creates a challenge for the agency and affects the employment and financial status of many beneficiaries. The Government Accounting Office (GAO) estimates that approximately 100,000 DI beneficiaries receive overpayments averaging \$12,000 each year (GAO, June 16, 2015).

A disability overpayment occurs when Social Security makes a monthly payment to a beneficiary that exceeds the amount that he or she should have been paid. Overpayments can occur for a number of reasons, such as medical improvement resulting in a beneficiary's ineligibility for benefits, personal factors including marriage or change in residence, and other factors. Work-related overpayments account for the majority of overpayment dollars, but are not the most prevalent type of DI overpayments (GAO, June 16, 2015).

### **A. DI program rules**

The complexity of the DI program rules related to work and earnings makes it extremely difficult for working beneficiaries to be aware of and comply with their responsibilities under the program, including the need to report earnings and provide other necessary documentation to Social Security. At the same time, Social Security offices must receive and process beneficiary information in a timely and accurate manner and correctly apply a set of complicated rules. Problems in reporting and processing, alone or in combination, frequently lead to significant overpayments for DI beneficiaries.

These complicated program rules result from Social Security's efforts to promote beneficiary employment and return to work. Current rules allow DI beneficiaries to work for a period of time (with no restrictions on the amount they can earn) without any loss of benefits, and then continue to work while receiving benefits if their earnings don't exceed a specified threshold. Several program provisions incentivize employment and enable beneficiaries to test their ability to work as they transition back into the workforce. The process begins with the Trial Work Period (TWP).

**Trial Work Period** - The first time after entitlement that a DI beneficiary goes to work, they may access a work incentive called the TWP. The TWP provides beneficiaries an opportunity to test their work skills while maintaining full benefit checks, no matter how much they may earn. Each year, Social Security sets a monthly amount to use as a guideline for determining use of

TWP months. For 2018, the TWP level is \$780. If a beneficiary (1) has pre-tax wages of more than the \$850 guideline; or, (2) works over 80 hours in self-employment during a month, that month counts as a Trial Work Service Month.

The TWP ends only when a beneficiary performs nine months of work over the Trial Work Period guideline within a rolling period of 60 consecutive months. The TWP service months do not have to be consecutive to be counted. For example, if individuals work above the threshold for a period of six months, and then have a 36 month lapse in employment, and then work for another three months, they will have completed the trial work period. Once the TWP is used, beneficiaries lose access to this incentive. Beneficiaries are only afforded one TWP during a period of entitlement.

Beneficiaries are responsible for accurately reporting their employment earnings to Social Security. Beneficiaries are required to notify the agency when they begin to work, increase their work hours, or experience a change in earnings. They must document their work activities through a formal reporting process. Reporting can occur in person at a local field office, or by phone, fax, mail, or the web via [mysocialsecurity.org](http://mysocialsecurity.org). After the beneficiary reports the work activity, Social Security enters the information into a data system. Social Security staff must then review the work report to determine whether a work Continuing Disability Review (CDR) is necessary.

**Substantial Gainful Activity** – The purpose of the work CDR is to determine whether a beneficiary has completed the TWP and is presently working at Substantial Gainful Activity (SGA) level. SGA refers to the level of a beneficiary’s work and earnings that can affect benefit payments. For each month in which the beneficiary has gross earnings over the SGA threshold amount (\$1,280 per month in 2018), the beneficiary does not receive a benefit payment. Completing a work CDR is a multi-step process during which a Social Security field office claims representative reviews beneficiary earnings (often going back a number of years) and completes a detailed set of computations. An entirely separate process is used to determine whether a self-employed beneficiary is working at SGA. If the beneficiary does not provide necessary information or Social Security fails to accurately process the information, it is highly likely that the beneficiary may receive an overpayment.

**Cessation Month and Grace Period** - As long as the beneficiary continues to have a disability, the first time that SGA level work could affect payment of benefits is after the Trial Work Period ends. When a beneficiary performs sustained SGA level work for the first time after the TWP, this first month where this pattern begins is called the “cessation month.” Social Security allows a payment to be made in this month and the two succeeding months, called the “Grace Period,” for a total of three months before benefits are terminated.

**Application of Work Incentives** - Congress has created some special provisions in the Social Security disability programs to encourage beneficiaries to enter and maintain employment. These work incentives allow DI beneficiaries to return to work on a short-term trial basis without jeopardizing benefits, enable beneficiaries to deduct the costs of accommodations and supports that might make employment possible, and in certain situations allow beneficiaries to reduce

countable wages if the value of their work is enhanced by external subsidies. While these work incentives have a positive effect on employment and return to work, the application of these provisions is highly complex and time consuming, leading to unavoidable processing delays and overpayments.

**Extended Period of Eligibility (EPE)** – Finally, the DI program rules provide a reinstatement period for beneficiaries who complete the nine month TWP and continue to have a medically determined impairment. The Extended Period of Eligibility (EPE), allows a beneficiary to be re-entitled to benefits any time during a 36-month period, if their work activity falls below the SGA level. The EPE reinstatement period begins with the month immediately following completion of the trial work period and ends 36 months later. If the beneficiary earns less than the SGA threshold of \$1,180 during an EPE month, the individual is entitled to receive their DI payment level for that month. If a beneficiary’s payments are “ceased” after the TWP, and the person needs to receive benefits again during the 36-month reinstatement period of the EPE, they do not have to file an application. Instead, they must simply establish with Social Security that their work activity is below SGA and provide a work activity report and necessary supporting documentation.

## **B. The magnitude of the overpayment problem**

Research conducted over the past 15 years has consistently documented the causes of Social Security overpayments (Livermore, 2003; Smetanka, 2009; GAO, June 16, 2015). Overpayments can occur when (1) beneficiaries fail to report their earnings in a timely manner, (2) Social Security fails to process earnings reports quickly, or (3) Social Security fails to properly compute payment for individuals who are working above the Substantial Gainful Activity threshold. When earnings are reported and processed accurately, correct payment adjustments can be made. However, the complexity of the regulations regarding the effect of earnings on disability benefits often leads to confusion on the part of the beneficiary and frequently results in inaccurate earnings reporting or a failure to report at all.

Beneficiaries who do not report timely and accurate earnings are at risk of sizeable overpayments. In most instances, Social Security will ultimately identify any overpayments by matching its own data with Internal Revenue Service data to determine if a beneficiary's earnings are above the specified threshold. Social Security then processes the information to determine the individual’s continued eligibility. Often, lengthy delays in the completion of the work CDR postpone the identification and increase the size of the overpayment, with beneficiaries sometimes responsible for repaying tens of thousands of dollars.

When the overpayment is discovered, Social Security requires the beneficiary to pay back the entire amount of the overpayment, often through a monthly payment plan that in most cases will involve deducting part of the monthly benefit payments. In fiscal year 2015, Social Security collected over \$800 million in repayments, with monthly benefit withholding accounting for 78 percent of repayments (GAO, April 13, 2016). The agency also has the authority to seek repayment from beneficiaries through their income tax refunds or their retirement benefits. In some instances, the beneficiary may appeal the overpayment and obtain a waiver that enables the individuals to avoid repaying the entire overpayment amount.

If SSA conducts a work CDR and determines that the beneficiary was overpaid and the beneficiary disagrees with the overpayment, the beneficiary may request a reconsideration. If the beneficiary agrees that they were overpaid, but feel that the overpayment was not due to their own actions, or if the individual lacks the means to repay Social Security, or repayment would result in great hardship, the beneficiary can request a waiver of the overpayment.

Work CDRs and SGA determinations place a large administrative burden on Social Security. For example, in Fiscal Year 2016, Social Security completed approximately 285,000 work CDRs (*Reducing Improper Payments*, 2017). The agency faces resource shortages that hamper its ability to conduct timely work CDRs. Each day over 500,000 individuals contact Social Security Field Offices. The agency continuously attempts to balance the needs of individuals filing claims and seeking information with the important task of logging changes in a beneficiary's employment and earnings (Colvin, January 24, 2012).

Social Security has taken numerous steps to reduce the number and amount of overpayments among DI beneficiaries. It has directed additional resources toward completing work CDRs, developed standardized review protocols, improved coordination between field offices, and prioritized cases with the highest earnings amounts to minimize large overpayments. In an audit of these procedures, the Social Security Office of the Inspector General concluded that the improvements had reduced the mean level of overpayments and should be continued (Office of the Inspector General, 2014).

Available evidence documents the extent of improper Social Security disability payments, the causes of overpayments in the DI program, and steps the agency is taking to address the work CDR challenge. However, we currently know very little about the effect of overpayment receipt on a beneficiary's subsequent employment status and earnings levels. After receiving an overpayment notice, do beneficiaries subsequently terminate, maintain, or change their jobs? Do they increase their work hours to assist them in repaying the overpayment, or do they reduce their earnings to prevent the occurrence of additional overpayments? Did they anticipate the notice and if so, had they set aside funds to repay the overpayment?

In this study, we explored the effects of receipt of a work-related overpayment notice on beneficiaries' subsequent work activity through a series of 84 structured interviews with current DI beneficiaries who experienced overpayments. We also examined the decision-making process beneficiaries use following overpayment notification, including the role of family members, peers, and work incentive counselors. The study's results have implications for Social Security as it works to reduce the number of work-related overpayments while continuing to support the employment efforts of current and future beneficiaries.

## II. DATA AND METHODS

---

The qualitative study consisted of semi-structured interviews with 84 DI beneficiaries who had previously received a notice of overpayment and were now attempting to return to work or maintain employment. Experienced work incentive counselors who had direct knowledge of the beneficiaries' situations conducted the interviews. This section describes the procedures used to identify the sample members, the development of the semi-structured interview, and the procedures used for data collection and analysis. The study addressed the following three research questions.

Research Question 1. To what extent does receipt of an overpayment change a beneficiary's subsequent work activity?

Research Question 2. What factors contribute to the likelihood that a beneficiary received an overpayment?

Research Question 3. To what extent are work incentive counseling services able to assist beneficiaries after an overpayment?

### A. Sample

The study relied on a convenience sample of Social Security beneficiaries who reported receipt of an overpayment. All respondents were DI beneficiaries who received work incentive counseling services through The Employment Success Advisor (ESA) program. The Beneficiary Access and Support Services program, funded by Social Security to support the Ticket to Work program, operated the ESA program through a subcontract to the Work Incentive Planning and Assistance (WIPA) National Training Center at Virginia Commonwealth University. The ESA program provided services from January 1, 2013 through April 30, 2014.

The ESA program provided work incentive counseling services to beneficiaries during a gap in afunding for WIPA projects that led to temporary cessation of operations. Due to the limited capacity of the ESA program, services were focused on employed beneficiaries who expressed a desire to reduce or eliminate their dependence on disability cash payments.

Twenty-two ESA work incentive counselors provided intensive, individualized support to Social Security beneficiaries referred by the Ticket to Work Help Line. The Help Line is a toll-free resource for beneficiaries seeking information on the Ticket to Work program, referrals to local Employment Networks and Vocational Rehabilitation agencies, and information on available work incentives and the effect of employment on benefit payments and health care coverage.

ESA services included assisting the beneficiary to make informed choices regarding career and financial goals, and to link beneficiaries with the employment services and support to enable them to obtain or retain employment. Specific services included:

- In-depth benefits analysis covering all federal, state, and local benefits;

- Customized counseling about the impact of work on all federal, state, and local benefits;
- Assistance with identifying, developing, using, and managing work incentives;
- Assistance with resolving problems related to benefits (including overpayments);
- Assistance with identifying and resolving barriers to obtaining or maintaining employment;
- Training and support on effective earnings reporting procedures and benefits management techniques; and
- Proactive follow-up to prevent or resolve problems related to benefits or employment (Virginia Commonwealth University, 2017).

### 1. Eligibility criteria for the ESA program

Customer Service Representatives at the Ticket to Work Help Line screened beneficiaries to ensure the beneficiaries met established criteria for ESA services. First, individuals had to meet the eligibility criteria for the Work Incentive Planning and Assistance (WIPA) program, including: (1) age 18 through 64; (2) disabled per Social Security’s definition, and (3) already eligible for Social Security benefits based on disability (though not necessarily in cash payment status). Second, candidates for ESA services were beneficiaries who were currently employed or who had a job offer pending. Beneficiaries who met the first two criteria and expressed an interest in reducing or eliminating their dependence on Social Security benefits were accepted for ESA services.

### 2. Development of sample pool

During its 16 months of operation, the ESA program served 1,790 beneficiaries. DI beneficiaries comprised 82 percent of the total ESA population. Of the 1,459 DI beneficiaries, 116 individuals (8.0 percent) reported receiving a prior overpayment notice from Social Security. ESA work incentive counselors attempted to contact all 116 individuals to request their participation in the study using a standardized protocol of telephone calls, emails and letters. The counselors successfully contacted 93 beneficiaries. Of those, 84 beneficiaries provided their consent to participate and formed the final data collection sample.

**Table 1. Summary of sample pool and study respondents**

<b>ESA beneficiaries</b>	<b>Number</b>	<b>Percentage</b>
Total number of beneficiaries served in the ESA program	1,790	100
Number of DI beneficiaries as a percentage of all program enrollees	1,459	81.9
Number of DI beneficiaries reporting a current or prior overpayment as a percentage of all DI enrollees	116	8.0
Number of beneficiaries completing interviews as a percentage of all DI beneficiaries reporting overpayments	84	72.4

The ESA work incentives counselors' prior clinical relationship with the beneficiaries accounted for the high sample consent rate. The ESA service protocol required counselors to maintain contact with the clients for six months, or longer if requested by the beneficiary. In most cases the counselors were currently providing or had recently provided clinical services to the

beneficiaries in the sample. The counselors had spoken previously with the clients about their overpayment, benefit type and amount, financial situation, and employment status. The counselors often had to make multiple efforts to contact the beneficiary (calling in the evening, calling multiple phone numbers, etc.), but once contact was made, the beneficiaries were generally willing to participate in the study.

### 3. Sample characteristics

Forty six percent of the sample was under the age of 50, with only 5 percent older than 60 and 4 percent less than 30 years of age. The median age of the sample was 52 years, which was consistent with the overall ESA population median age of 53 years.

The beneficiaries in the sample were a highly educated group. Seventy-seven percent of individuals had some education after high school, with 36 percent holding college diplomas or advanced degrees. The relatively high education level reflects the unique nature of the group and must be considered in the interpretation of the subsequent results.

**Table 2. Demographic characteristics of the study sample (N=84)**

Characteristic	Percentage
<b>Age</b>	
Less than 30	3.6
30-50	42.8
51-60	48.8
Over 60	4.8
<b>Highest level of education</b>	
Less than high school	11.9
High school diploma	10.7
Some college	41.7
College diploma	33.3
Advanced degree	2.4

### B. Instrumentation

The study relied on a 24-item structured interview guide to obtain objective and subjective information from each study participant. Data included beneficiary demographic information, current status, detailed information on the overpayment, the decision-making process and actions used by the respondent to make subsequent employment decisions, and the role of the ESA work incentive coordinator in the overpayment process. The data elements collected from respondents are as follows:

- **Demographic information:** Age, type of benefit, highest grade attained, gender
- **Employment status:** Employed, full or part-time, hours worked per week, hourly wage, length of time in current job
- **Overpayment information:** History of overpayment, amount of overpayment, reason for overpayment, waiver/appeal, disposition, change in employment status

- **Overpayment decision process:** Accuracy of overpayment, level of concern, ability to advocate for self, decision of change or maintain employment, persons assisting in employment decision
- **Role of work incentive counselor:** Receipt of service, development of past work, assistance in use of work incentives, assistance in maintaining employment

A three-step process was used to develop the interview guide. The ESA work incentive counselors met as a group to discuss issues pertaining to overpayments and suggest questions for the interview guide. The researcher used the results of this discussion to develop a preliminary draft of the instrument. The draft was submitted to a work group comprised of four senior members of the WIPA National Training Center (NTC), each of whom had more than 15-years experience providing clinical services to beneficiaries and technical assistance to work incentive coordinators. The work group made multiple suggestions and the instrument was revised to improve the overall clarity and reorder several of the questions.

### **C. Data Collection and Analyses**

Data collection occurred between July 1 and September 21, 2014. The ESA work incentive counselors contacted the beneficiaries, obtained consent, and conducted the interviews. The counselors offered a \$50 honorarium to each respondent for participation. The average length of the interviews was 35 minutes.

The completed interviews were compiled and analyzed using ATLAS.ti 7.0. Descriptive statistics were computed to analyze the numerical and categorical items. A research assistant trained in ATLAS.ti coded and analyzed the narrative items on the interviews, identified themes across multiple interviews, and sorted the results by research question.

### III. RESULTS

---

This section describes the key study results, including information on respondents' employment experiences, amount of overpayment, and key findings related to each of the research questions.

#### A. Employment status at time of overpayment notification

The respondents' employment status at the time of the overpayment notice and at time of interview, mean monthly earnings in most recent job, and earnings above Substantial Gainful Activity level are described in Tables 3 and 4. Fifty-seven percent of respondents received a notice of overpayment while employed at their current job. These beneficiaries may have maintained their employment at the current job and kept their earnings constant, decreased or increased their earnings, or separated from employment and subsequently attempted to return to their same job. The remaining respondents (43 percent) received the notice while employed at a prior job. These beneficiaries may have separated from employment for a period of time, some for several years, but contacted the Ticket to Work Help Line because they had subsequently re-entered employment. Responses indicated that for some individuals, an overpayment is not a one-time event, with 16 percent of respondents reporting more than one overpayment in the past ten years.

Nearly all (95 percent) of respondents were employed at the time they were notified as being in overpayment status. Of those, 49 percent were employed full-time (32 hours or more per week), with the remainder employed part-time (39 percent) or self-employed (7 percent). The respondents' employment status changed considerably between the date of overpayment notification and the date of the interview. The percentage of beneficiaries not employed rose from 4 percent to 25 percent, while the percentage of respondents working full-time declined from 49 percent to 37 percent. Seventy-five percent of beneficiaries were working after a notice of overpayment.

**Table 3. Respondent employment and earnings (N=84)**

Employment and earnings	Value
Overpayment occurred at current job (%)	57.1
Overpayment occurred at prior job (%)	42.9
Mean monthly earnings in most recent job	\$1,237
Percentage of respondents earning above SGA in their most recent job	65.4

**Table 4. Respondent employment status at overpayment notification and interview (N=84)**

Employment status	Percentage at time of overpayment notification	Percentage at time of interview
Employed full-time	48.8	37.4
Employed part-time	39.3	32.8
Self-employed	7.1	4.8
Not employed	4.8	25.0

Overpayment amounts ranged from a low of \$392 to a high of \$68,000. The mean overpayment was \$13,448 with a median of \$9,610. Fifty-five percent of respondents had overpayments of \$5,000 or more, with 26 percent of those beneficiaries receiving overpayments totaling over \$10,000 (Table 5).

Half of all overpayments (49 percent) occurred within the past year. However, 27 percent of respondents received an overpayment over two years prior to the interview, with several receiving initial overpayments five or more years before contacting the ESA program. Significantly, when the ESAs completed detailed verifications of beneficiaries' disability payment history, they identified 14 individuals who had received multiple overpayments. These individuals received an overpayment, stopped working or reduced their earnings below the Substantial Gainful Activity amount, and then months or years later returned to work or increased wages to a point where they were again in overpayment status. Three respondents had been in overpayment status more than four years over a ten year period.

**Table 5. Size and timing of overpayments (N=84)**

Variable	Number	Percentage
<b>Size of overpayment</b>		
Less than \$1,000	11	13.1
\$1,000 - \$5,000	27	32.1
\$5,001 - \$10,000	25	29.8
More than \$10,000	21	25.0
<b>Length of time since receipt of overpayment notification</b>		
Less than 3 Months	17	20.2
3 Months to 12 Months	24	28.6
12 Months to 24 Months	20	23.8
More than 24 Months	23	27.4

Beneficiary age and education level correlated with the likelihood that an individual would receive an overpayment of over \$5,000. Beneficiaries with a high school education tended to have lower overpayments. This reflected their lower earnings levels, which resulted in lower disability benefit amounts. There was no relationship between age or education and the length of time since overpayment notification and beneficiary employment status at the time of overpayment.

**B. Research Question 1. To what extent does receipt of an overpayment affect a beneficiary's subsequent work activity?**

The beneficiaries in the study responded to their overpayment notice in a number of different ways. As described in Table 6, over half of the respondents (51 percent) immediately terminated employment upon receipt of the notice. This group was evenly split between individuals who had since returned to employment and those who were currently seeking employment. An additional 23 percent maintained employment but reduced earnings.

These findings must be interpreted in the context of the unique study sample. All respondents were individuals who had contacted the Ticket to Work Helpline for (1) questions related to the Ticket to Work program, (2) referrals to employment service providers (Employment Networks or state Vocational Rehabilitation agencies), or (3) questions about Social Security disability programs, work incentives, or the effect of employment on disability benefits. The ESA program's eligibility requirement that an individual be currently employed or anticipate being employed in the immediate future eliminated DI beneficiaries who may have experienced prior overpayments, terminated their employment, but had not yet made the decision to return to work.

**Table 6. Change in employment status after overpayment (N=84)**

Employment status change	Number	Percentage
Terminated Employment - Returned to Employment	22	26.2
Terminated Employment - Seeking Employment	21	25.0
Maintained Employment - Reduced Level of Earnings	19	22.6
Maintained Employment - Maintained Level of Earnings	18	21.4
Maintained Employment - Increased Level of Earnings	4	4.8

Interviews revealed that most of the individuals who terminated employment after receiving the overpayment notice did so for three primary reasons. First, some beneficiaries were afraid that continued employment would lead to overpayments in the future. When they realized that their monthly cash benefit would be reduced to repay the overpayment (often by \$70 per month), they felt that they could not afford any additional benefit reduction and terminated their employment. After a period of unemployment, some respondents in the study made the decision to return to work because: (1) they felt that they must return to work to meet their financial needs, or (2) they missed the personal and social rewards of working.

*She felt she had to keep working as best as she could to make ends meet financially and because she wants to work. She enjoys not only the financial aspect but the social aspect as well and helps her maintain mental and emotional well-being.*

Second, some beneficiaries were extremely frustrated. They felt that they had reported that they were working to Social Security, complied with all reporting requirements, received inaccurate information from the local field office or toll free number and that they couldn't trust Social Security to pay them accurately.

*He indicated that he is receiving paper work from four different offices and has talked to 20 or more different people within Social Security and they all give him different answers. He feels Social Security should be centrally located within each state. Paperwork coming from all over the place does not make sense. If the person at the local field office puts in accurate information or does not, then you get a letter from another location and you have to talk to them and they say well this is wrong or that is wrong. He indicated how frustrated he was with the situation because he kept asking and kept asking and kept asking, and kept getting wrong information and now he is supposed to pay up. It is wrong.*

Third, small number of beneficiaries had already terminated their employment by the time that they were notified of their overpayment. Reasons for leaving employment primarily included a change in health status, with moving to another state, childcare or eldercare responsibilities, retirement reported by a few beneficiaries.

Finally, in addition to the financial shock, beneficiaries reported that receiving an overpayment notice also has a negative emotional effect that may disrupt their careers.

*The beneficiary indicated that she was devastated and required numerous sessions with her psychiatrist and therapist. The overpayment threw her into emotional turmoil. She made the decision that working was too stressful and she did not feel she would be making another attempt to work in the future. The overpayment hurt her ability to cope with her depression and anxiety.*

### **C. Research Question 2. What factors contribute to the likelihood that a beneficiary received an overpayment?**

A variety of factors affected beneficiaries' decisions to maintain or modify their employment situation after receipt of an overpayment notice. First, in some instances, the overpayment notice came as a complete surprise to the beneficiary, such as, "*I did not know that I needed to be reporting my earnings to Social Security - no one ever told me.*" Some beneficiaries remembered receiving information from Social Security when they were first awarded benefits, others did not recall getting this information.

*The beneficiary indicated that she does not know how or when the overpayment occurred. She said her mom was helping at the time and it was too much information for her to handle. She remembered that the representative told her it was likely a computer error but that she owed this money. She did not appeal or ask for a waiver since the repayment amount was set at \$10 a month. She did not know of these options. She reported that she has worked only very little since her car accident due to her disabilities.*

Overpayments were clearly a major challenge for many beneficiaries, particularly high earners with unstable earnings. Several beneficiaries expressed great frustration when they had reported their earnings to Social Security, or been told by Social Security they were due a payment, only later to receive an overpayment notice. Overpayments were often caused by delays in Social Security processing of earnings information.

Table 7 describes the beneficiaries' reaction to the notification of the overpayment. Over 75 percent of beneficiaries indicated that they were very or extremely concerned after the initial notification. They did not anticipate an overpayment and did not understand why the overpayment occurred.

*In 2009 she started receiving DI, worked for 30 months full-time then stopped working due to health issues. After she stopped working she was notified that she owed \$32,000. She had no idea that her benefits were going to be affected by her well-paying part-time job.*



**Table 7. Respondents' concern about their financial situation when they received a notice of overpayment (N=84)**

Degree of concern	Percentage
Extremely concerned	67.8
Very concerned	9.6
Concerned	11.9
Not very concerned	5.9
Not concerned at all	4.8

There was generally a direct correlation between the amount of the beneficiary's overpayment and the level of beneficiary concern. Beneficiaries with higher overpayments were more likely to report being extremely concerned about their financial situation. However, of the 11 beneficiaries with overpayments of less than \$1,000, six individuals indicated that they were very concerned or extremely concerned with their financial situation.

A relatively small number of beneficiaries indicated that they were aware of the earnings reporting requirement, but admitted that they had not taken action to report their earnings as required under the Social Security regulations. These individuals accounted for about 10 percent of the sample.

*She said she had so many battles to fight, like getting her medical records, to different doctors, etc. that she just didn't have the energy to fight the overpayment or figure out why it occurred. She felt that nothing ever actually works with these kinds of things, so she just did nothing, accepted it and pays the \$10 a month. At her current rate of pay, she will have it paid off in about 36 years.*

*She said she reported to Social Security when she started working but did not report monthly wage information. She worked the job for a year before having to move out of state. She called to report the change in work status and moving and shortly after was notified of the overpayment.*

A number of respondents reported that they were surprised that the overpayment occurred because they thought that they were following all the program rules. In most instances, they indicated that they were following the directions they received from Social Security employees.

*She said she notified Social Security of working and they told her she could work as much as she wanted for 1 year. She did notify Social Security that she was continuing to work and they told her it was fine she could earn as much as she wanted for the next 2 years. Then she was notified that they were terminating her.*

*Overpayment occurred since the beneficiary started his own business. He has been in contact with Social Security and was given bad information. He kept being told by his local field office social security representative that he had three years to make it, to get his business off the ground and then get off his benefit. He was told not to worry. It will be three years in July of 2014. He kept checking to make sure he was doing everything correctly. His original claims representative at the local field office retired and another*

*claims representative took over his case. This claims representative told him that he needed to complete a work activity report, that he should have been reporting, and the information he received from the previous representative was wrong. He became worried and called the Social Security national line. He did not know who was giving him the correct information. He had been told all along that he was doing okay and what was necessary and now was being told a different story.*

The results described above reflect the self-reported perceptions of the sample members served in the ESA program. A significant percentage of the respondents failed to accurately report earnings as required of DI beneficiaries. Some beneficiaries were clearly unaware of their reporting responsibilities, whether because they did not receive accurate information or they misunderstood the information that they were given. Other beneficiaries were aware of their responsibilities, but were not able to complete the required reporting responsibilities. However, those individuals who knowingly failed to report their earnings did not appear to have an expectation that the Social Security would ultimately fail to uncover the overpayment. While it was not possible to know the intentions of all respondents, it did not appear that sample members were consciously engaging in fraudulent activity.

**D. Research Question 3. To what extent are work incentives counseling services able to assist beneficiaries after an overpayment?**

Respondents were asked to rate their ability to advocate for themselves with Social Security after receiving the overpayment notice. As indicated in Table 8, 67 percent of the beneficiaries indicated that they were not able to effectively communicate with Social Security.

The respondents reported on the services that they received from the ESA related to their overpayment. The ESAs provided assistance in accurately completing work activity reports for submission to the local field office, identifying undeveloped work incentives, and assisting in communication with Social Security personnel.

**Table 8. Respondents’ perception of how well they were able to advocate effectively for themselves with Social Security (N=84)**

Degree of effectiveness	Percentage
Extremely effectively	7.2
Very effectively	4.8
Effectively	21.4
Not very effectively	16.6
Not effectively at all	50.0

**1. Assisting beneficiaries to accurately report earnings**

A common problem faced by many respondents was that they had not reported their earnings using the appropriate Social Security forms and reporting mechanism. This made it impossible for Social Security to correctly process the beneficiary’s case. When the ESA assisted the individual to fulfill the reporting requirements, Social Security was then able to reconsider the beneficiary’s work activity and render an accurate decision. For example:

*The ESA researched his work history, completed a Benefit Summary and Analysis that helped him learn about work incentives, and told him that he likely was in overpayment. He actually had completed his Extended Period of Eligibility in January 2011. He had not heard of the Trial Work Period or Extended Period of Eligibility prior to this time. The ESA helped him complete the correct Work Activity Report for self-employed beneficiaries. He had been sent the wrong one by Social Security. He filed for a waiver in April 2013, as payment of the overpayment would likely bankrupt his small business. The waiver was approved in August 2013.*

## **2. Assisting beneficiaries to use work incentives to lessen the impact of the overpayment**

A large majority of beneficiaries were unaware that they may have had undeveloped work incentives that might benefit their situation. The ESAs worked with each beneficiary to determine if prior work has been accurately reported and whether all relevant work incentives (Impairment Related Work Expenses, Subsidies/Special Considerations, Unsuccessful Work Attempt, etc.) had been applied. In several cases, the ESA worked with the individual to reduce the size of the overpayment.

*She filed for expedited reinstatement in November, 2013 and got approved for it to restart in March, 2014 but has not received any payments yet. They terminated her benefits incorrectly saying she was no longer disabled so her Medicare got cut off too, including her QMB [Qualified Medicare Beneficiary] status. She has been told that when her DI restarts she can make arrangements to start repaying the overpayment.*

*The ESA helped her develop an Impairment Related Work Expense (IRWE) request and formal documentation that she submitted to Social Security for expenses she incurred while working. Social Security reviewed and approved the IRWE, which decreased the amount of her overpayment \$43,000 to \$20,000. The ESA also assisted in getting her Medicare coverage reinstated.*

## **3. Assisting beneficiaries to communicate with Social Security**

In multiple instances, the ESA assisted the beneficiary by communicating with Social Security personnel. In some instances, ESAs would communicate directly with Area Work Incentive Coordinators (who are employed by Social Security to improve the agency's services to beneficiaries in pursuit of employment), field office managers, and other personnel. For example:

*The Social Security representative was counting my earnings when paid instead of when earned. I tried to speak to the representative, but I was unsuccessful. The ESA contacted the Area Work Incentive Coordinator and the local office manager to prevent my benefit from being terminated.*

#### **IV. STUDY LIMITATIONS**

---

The unique characteristics of the sample limit the generalization of the study findings. All respondents had initially contacted the Social Security Ticket to Work Help Line, indicating that they had questions about the use of the Ticket or effect of earnings on Social Security disability benefits. Once referred to the ESAs, the beneficiaries were further screened to determine whether they were: (1) currently employed or had a job offer pending; and (2) expressed an interest in reducing or eliminating their dependence on disability cash benefits. The highly specific eligibility criteria do not allow the results of the study to be applied to all individuals served by WIPA programs or the entire Social Security disability population.

The sample did not include any individuals who received a notice of overpayment and subsequently did not engage in any additional work activity. It only includes individuals who continued working, returned to work, or contacted the Ticket to Work Help Line to pursue subsequent employment after an overpayment notice. As a result, it does not provide insight into the decision-making process of beneficiaries for whom an overpayment may lead to permanent employment disruption.

The relatively small sample size limited the depth of data analyses. While the overall effective sample of 84 allowed the examination of beneficiaries who either terminated or maintained employment after overpayment, we were not able to effectively analyze specific subpopulations, such as individuals with different types of disability benefits, younger versus older workers, and others.

The ESA counselors interviewed the beneficiaries and subsequently recorded their responses. The interviews were not recorded. As a result, the comments provided in the results section are not verbatim quotes from the beneficiaries. At the same time, the ongoing clinical relationships between the ESA counselors and the beneficiaries are a major strength of the study. Beneficiaries provided the counselors with detailed information regarding their employment and benefit status, as well their actions after receipt of the overpayment notice. The counselors were able to fully comprehend the intricacies of the reasons for the overpayments, the interactions between the beneficiaries and local Social Security Field Offices, and the financial and employment context that framed the decisions of the beneficiaries. The result was an extremely complete data set, with virtually no missing data elements, that allowed the thorough review of each beneficiary's experiences.

## **V. DISCUSSION**

---

The results of the study shed light on the complexity of Social Security's overpayment problem and document the challenges involved in developing and implementing effective, long-term solutions. The findings document the multiple factors involved in the overpayment dilemma. Many DI beneficiaries have a very difficult time understanding the rules and procedures involved in the work activity reporting process. For some, the actual process of reporting is quite daunting, particularly if they make use of available work incentives (e.g. taking time off work to visit the local Social Security field office, providing evidence of their impairment related work expenses, working with their employer to document a work incentive, submitting pay stubs by mail or fax, obtaining a receipt, etc.). Some beneficiaries may receive information from Social Security that is not accurate or complete, or misunderstand the information provided by the Claims Representative. As a result, far too many beneficiaries do not understand their reporting responsibilities or do not report accurately, even while they believe that they are complying with all required procedures.

### **A. No evidence of fraudulent activity**

The findings from the study do not address the extent to which the overpayments experienced by the respondents resulted from fraudulent actions on the part of the beneficiary. Certainly, some beneficiaries do commit fraud by not reporting earnings in hopes that Social Security will not ultimately identify the overpayment, or by simply working in jobs in which wages are not reported to the Internal Revenue Service. At the same time, it would be a huge mistake to assume that all overpaid beneficiaries have knowingly attempted to circumvent the program rules. In the present study, the results indicated that most beneficiaries clearly want to abide by the rules. Too often, their actions reflect their erroneous belief that if the government sends them a benefit check, the amount of that check must be correct.

### **B. Repayment requirements**

Many of the interviewed beneficiaries included in the sample were currently repaying their overpayments. Some beneficiaries were having their benefit check reduced by \$10 per month; several others reported benefit reduction of \$70 per month. Given the size of the overpayments, the interviews revealed that some beneficiaries would be repaying their overpayment for several decades.

The lengthy repayment periods have been studied by government auditors. The Government Accounting Office (GAO-16-331, April 2016) recommended that Social Security establish a floor of 10 percent of the individual's monthly payment, which would significantly shorten the repayment period. Many interviewees said they were doubly concerned with trying to return to work while paying back debt arising from benefit overpayments. Many expressed a need to continue receiving SSA cash benefits in order to repay SSA for past overpayments. The inability to repay debts or save money was a frequently mentioned concern, especially among beneficiaries with relatively low monthly payments.

### **C. The role of work incentive counseling in mitigating the impact of overpayments**

Social Security field office personnel encounter tremendous challenges dealing with the ever-increasing demands of their jobs. Field office staff must deal with a wide variety of technically complex issues, and addressing issues related to work activity is a very small share of their workload. Hence, many lack in depth knowledge of the complex details of work incentives used by employed beneficiaries and the intricate processes involved in processing beneficiary work activity. Beneficiaries frequently do not know when and how to report their earnings to local field offices, and sometimes view earnings reporting as too difficult given the health and transportation obstacles they face. This may lead to many beneficiaries making employment decisions based on incomplete or inaccurate information, individuals in overpayment status, and the long-term unemployment or under-employment of beneficiaries who otherwise have the desire and ability to work. The results of the present study illustrate how the services provided by work incentive counselors, such as counseling beneficiaries on their earnings reporting responsibility, verifying past work histories, and developing available work incentives can reduce overpayments among beneficiaries and save significant resources for the agency.

**Accurate earnings reporting** - Work incentive counselors can assist with the overpayment problem in a number of ways, including preparing beneficiaries to accurately report their earnings to Social Security. The results of the study provide multiple examples of the consequences of incomplete earnings reporting. When Social Security does not obtain timely and accurate earning information from working beneficiaries, overpayments can continue to accrue for years, often accumulating up to tens of thousands of dollars for a single individual. Ultimately these enormous overpayments create significant disincentives to work for many beneficiaries who might otherwise seek to achieve self-sufficiency (GAO, 2011).

**Preparation for potential overpayments** - Work incentive counselors work proactively with beneficiaries to prepare them for potential overpayments. Work CDRs can be extremely complex and time-consuming for Social Security field office staff to perform, often involving detailed folder review, in-person interviews, and contacting beneficiaries and their employers to verify monthly earnings, while taking into consideration a number of complex work incentives in order to determine whether earnings exceed SGA (GAO, 2004). In light of these factors, WIPA projects are proactively working with beneficiaries to anticipate and prepare for potential overpayments. For example, when it is clear that an DI beneficiary has likely completed his or her Trial Work Period and appears to be working at Substantial Gainful Activity (SGA) level, many work incentive counselors will recommend that the beneficiary ask Social Security to review his or her work activity and make an SGA determination. In certain cases, where pay stubs are not available, clients are asked to complete a Work Activity Report (SSA-81-BK).

**Preventing employment termination** - Work incentive counselors can also assist the beneficiary upon receipt of an overpayment notice. Despite the efforts of the beneficiary and the local Social Security Field Office, many beneficiaries continue to receive overpayment notices. Overpayments are a primary reason beneficiaries contact work incentive counselors for assistance. Many of these beneficiaries may express their intention to terminate employment, but

reconsider their decision after receiving services from the project. The results of the current study document multiple instances in which work incentive counseling can ensure that the overpayment doesn't lead to a decision on the part of the beneficiary to terminate employment, a decision that is often not in the best financial interest of the beneficiary. When an overpayment occurs, work incentive counselors can work with the beneficiary and the local field office staff to ensure that past work has been accurately computed and that all work incentives have been applied, potentially reducing the impact of the overpayment on the beneficiary.

#### **D. Conclusion**

Although the majority of the overpayments due to work activity result from beneficiaries' failure to report work activity, the Social Security Office of the Inspector General (OIG, 2010) has found that many SGA related overpayments are due to record keeping backlogs and the challenges Social Security faces in conducting work CDRs and redeterminations to establish beneficiaries' eligibility status. Resource limitations and the labor-intensive process that must be completed before an individual's benefits are terminated impede Social Security's ability to minimize the number of overpayments. David Weaver, at the time the Deputy Commissioner in the Social Security Office of Research, Demonstration and Employment Support (ORDES), in testimony to the U.S. House of Representatives (Weaver, June 16, 2015), summarized the complexity of the overpayment problem.

Overpayments can occur because disability beneficiaries may not understand when they have to report earnings to us and do not report work activity timely. Even if beneficiaries do report their work activity to us, overpayments can occur because our employees need time to determine whether such activity would require suspension or termination of benefits. For example, as required under the Act, our employees would need to determine whether such activity was in a Trial Work Period, whether beneficiaries had any Impairment-Related Work Expenses, and whether beneficiaries were receiving any subsidies or special conditions associated with their work.

Today, literally hundreds of thousands of SSA beneficiaries are in overpayment status. However, these issues are not simply administrative or enforcement concerns. *It is crucial that overpayments and the application of other work incentives must be viewed from the perspective of beneficiaries.* Although our evidence is presumably not representative of the experiences of all beneficiaries who receive substantial overpayments, it is well beyond anecdotal. These beneficiaries were seeking to return to work, despite their negative experiences with overpayments. We don't know how many beneficiaries with overpayments either continued to work or stopped working without seeking counselor assistance. The interviewees do, however, represent a substantial number of those experiencing overpayments. Based on their reported experiences, many such beneficiaries reduce or curtail their employment efforts as a result. Many others experience extreme financial hardship as they and their families are required to repay monies they erroneously received, even though they believe that they complied with every reporting deadline in a timely and accurate manner.

Substantial overpayments are the norm, not the exception, for beneficiaries who return to substantial work. Hoffman et al. (2018) estimated that over the 2010-2012 period, 71 percent of

beneficiaries with sufficient earnings to be at risk of work-related overpayments actually had overpayments. Median accumulated overpayments months was nine, with a median accumulated overpayment amount over \$9,200. Their statistics imply approximately 100,000 beneficiaries experienced overpayments during this period, with 50,000 accumulating overpayments of at least \$9,200.

As reported in Hoffman et al. (2018), SSA has undertaken substantial steps to reduce work-related overpayments. These steps involve identifying earnings more quickly, giving higher priority for processing reviews of work activity to cases where overpayments have likely started, and providing a method for beneficiaries to securely report earnings via an internet portal, *my Social Security*.

Finally, if beneficiaries are to accept personal responsibility for their careers and their economic self-sufficiency, they have to have confidence in the information they receive and the service providers that assist them. If beneficiaries are told that employment will affect their benefits in a certain manner, they have to be able to trust and act on that information. If individuals with significant, chronic health conditions are told that they will still have access to health care coverage even though they no longer receive a cash benefit from SSA, they must be able to depend on this information, as erroneous information may literally put them in a potentially life-threatening situation. If successful, SSA's efforts to reduce the frequency and size of overpayments will go a long way toward regaining the trust of beneficiaries who work or want to work. Work incentive counselors could be an important part of that effort. They work with beneficiaries to accurately report their earnings and minimize the impact of overpayments on their personal and family finances. This is a function that is inherently problematic for SSA field offices to perform, because their employees cannot be trusted advisors to beneficiaries while also being SSA's representatives. Work incentives counselors can do that. Addressing this problem is vital to the success of any Social Security employment initiative.

## VI. REFERENCES

---

- Hearings before the Committee on Ways and Means Subcommittee on Social Security*, House of Representatives, 112<sup>th</sup> Cong. (2012) (testimony of Carolyn Colvin)
- Hoffman, Denise, Benjamin Fischer, John Jones, Andrew McGuirk, and Miriam Loewenberg. (2018). *Work-Related Overpayments of Social Security Disability Insurance Beneficiaries: Prevalence and Descriptive Statistics*. Washington, DC: Mathematica Policy Research Working Paper.
- Livermore, Gina. (2003). Wage reporting and earnings-related overpayments in the Social Security disability programs: Status, implications, and suggestions for improvements. Paper prepared for the Ticket to Work and Work Incentives Advisory Panel. Washington: DC: Cornell University Institute for Policy Research. Retrieved from <http://homelesshub.ca/resource/wage-reporting-and-earnings-related-overpayments-social-security-disability-programs-status>
- Office of the Inspector General. (2010). *Congressional response report: The Social Security Administration's process for identifying and preventing improper payments to individuals who return to work*. (A-01-11-21043) Baltimore, MD: Social Security Administration. Retrieved from <https://oig.ssa.gov/sites/default/files/audit/full/pdf/A-01-11-21043.pdf>
- Return-to-Work and Overpayments in the Disability Insurance Program: Hearings before the Committee on Ways and Means Subcommittee on Social Security*, House of Representatives, 114<sup>th</sup> Cong. (2015) (testimony of David Weaver)
- Smetanka, Stella L. (2009) "The Disabled in Debt to Social Security: Can Fairness Be Guaranteed?" *William Mitchell Law Review*: Vol. 35: Iss. 3, Article 4.
- Social Security Administration. (2017). *Monthly Statistical Snapshot, July 2017*. Retrieved from [https://www.ssa.gov/policy/docs/quickfacts/stat\\_snapshot/2017-07.pdf](https://www.ssa.gov/policy/docs/quickfacts/stat_snapshot/2017-07.pdf)
- Social Security Administration. (2017). *Reducing Improper Payments*. Retrieved from <https://www.ssa.gov/improperpayments/index.html>
- U.S. Government Accountability Office. (2004, September). *Disability Insurance: SSA should strengthen its efforts to detect and prevent overpayments*. (Publication GAO-04-929). Retrieved from <https://www.gao.gov/assets/250/244002.pdf>
- U.S. Government Accountability Office. (2011, July). *Disability Insurance: SSA can improve efforts to detect, prevent, and recover overpayments*. (Publication GAO-11-724). Retrieved from <https://www.gao.gov/assets/330/321979.pdf>
- U.S. Government Accountability Office. (2013, April). *Disability Insurance: SSA needs to better track efforts and evaluate options to recover debt and deter potential fraud*. (Publication GAO-16-331). Retrieved from <https://www.gao.gov/assets/680/676530.pdf>
-

U.S. Government Accountability Office. (2015, June). *Disability Insurance: Preliminary observations on overpayments and beneficiary work reporting*. (Publication GAO-15-673T). Retrieved from <https://www.gao.gov/assets/680/670835.pdf>

[www.mathematica-mpr.com](http://www.mathematica-mpr.com)

---

**Improving public well-being by conducting high quality,  
objective research and surveys**

---

PRINCETON, NJ ■ ANN ARBOR, MI ■ CAMBRIDGE, MA ■ CHICAGO, IL ■ OAKLAND, CA ■  
SEATTLE, AZ ■ TUCSON, AZ ■ WASHINGTON, DC ■ WOODLAWN, MD



Mathematica® is a registered trademark  
of Mathematica Policy Research, Inc.