



STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

January 9, 2018

Mr. Samuel D. Roberts
Commissioner
Office of Temporary and Disability Assistance
40 North Pearl Street
Albany, NY 12243

Re: 2016-BSE7-01

Dear Commissioner Roberts:

This is the first in a series of reports that will be issued to the Office of Temporary and Disability Assistance (OTDA) regarding our examination¹ of New York State Supplemental Program (SSP) payments, for which OTDA assumed administrative responsibility in 2014. The objective of these examinations is to determine the appropriateness of SSP payments made during the period October 2014 through March 2016. At this time, we are reporting on the results of our examination of SSP payments made to, or on behalf of, deceased individuals.

A. Results of Examination

We used data analytics to examine payments made to recipients and found OTDA processed payments to 78 individuals who, according to VERIS Social Security Number (SSN) Verification Services, died from 1 to more than 16 years prior to their last SSP payment during the examination period. VERIS uses the Social Security Administration's (SSA) Death Master File to provide information as to whether the person associated with a social security number is deceased. The recipients received 553 SSP payments totaling \$42,304. Of the 553 payments, 380 payments made to 46 recipients were deposited directly into the recipient's bank account or the recipient's check was cashed. The remaining 173 payments made to 37 individuals were returned by the bank or checks remained uncashed. As of November 1, 2017, OTDA was continuing to process payments to 6 of the 78 recipients VERIS reported as deceased.

We shared a draft report with OTDA Officials and considered their comments (Attachment A) in preparing this final report. The comments of the State Comptroller on OTDA's response are included in Attachment B.

¹ We performed our examination in accordance with the State Comptroller's authority set forth in Article V, Section 1 of the State Constitution, as well as Article II, Section 8, and Article VII, Section 111 of the State Finance Law.

In response to the draft report, Officials agreed that 70 recipients were paid after their death, but stated OTDA made the payments based on untimely death reporting from the SSA. In contrast, Officials disagreed they improperly paid benefits to 8 recipients, indicating the individuals were not deceased. Subsequent to their response, Officials acknowledged one recipient was deceased. Our Office determined another recipient received duplicative benefits under his own SSN and a SSN belonging to a deceased person.

Officials continue to maintain the remaining six recipients are eligible for SSP benefits because they received SSI benefits. OTDA Officials assert that Social Services Law § 209(1)(b) and Subpart 398-4 of the Regulations of the Department of Social Services require OTDA to pay SSP benefits based on the SSA's determination of recipients' eligibility for SSI. Officials interpret this to mean that as long as the SSA pays SSI benefits to a recipient, OTDA is required to pay SSP benefits, even if there is evidence the SSA's determination may not be correct.

It is not clear why Officials would interpret the law and regulations in a manner that would prevent OTDA from taking action in those cases where OTDA has knowledge that the information provided by the SSA is inaccurate. We further question OTDA's position in light of language in:

- Social Services Law, § 209(1)(b), which provides that a person “properly” receiving SSI benefits is eligible for SSP. We question whether a deceased person is “properly” receiving SSI benefits.
- 18 NYCRR § 398-4.3, which expressly provides that OTDA can consider other information available in determining SSP eligibility. Officials acknowledge they can take action in those instances where OTDA is informed of a recipient's death prior to receiving notice of death from the SSA. These actions suggest OTDA is not prevented from acting when SSA's information is inaccurate.

Subsequent to OTDA's written response to our draft report, Officials told us their staff spoke on the phone with people who either alleged to be the remaining six recipients themselves or a representative for them. Each person claimed the recipient was alive. Testimonial evidence is not reliable in these cases because if the recipient is truly deceased, someone may falsely represent to OTDA that the recipient is still alive to continue receiving SSP payments. For cases of inaccurately reported deaths, the SSA requires the affected person to present original identification, such as a driver's license or passport, in person at a local SSA office. OTDA should consider this, or a similar, approach to confirm whether recipients are alive when they have evidence to suggest the recipients are deceased.

When a recipient dies, SSP payments cease. Neither deceased SSP recipients nor their beneficiaries are entitled to SSP payments after the date of death. The SSA notifies OTDA of SSI recipients' initial and ongoing eligibility as well as ineligibility due to a recipient's death.

However, OTDA Officials report there is often a lag between a recipient's date of death and notification by the SSA. OTDA also obtains information on recipients' dates of death from a variety of sources including caseworkers assigned to recipients from other OTDA supervised benefit programs, and recipients' family members. Officials stated they are also exploring other ways to more timely identify deceased recipients and are working to establish a mechanism to inform SSA when they identify a recipient is deceased.

As of April 1, 2017, funds representing 114 of the 173 payments were reported as abandoned property to the New York State Comptroller's Office of Unclaimed Funds (OUF) under the New York State Abandoned Property Law since the SSP checks remained uncashed for over one year. The funds reported to the OUF remain subject to claim at anytime. This poses a risk because deceased individuals' beneficiaries may claim funds reported to the OUF to which the deceased was never entitled.

Processing payments to deceased individuals also adds unnecessary administrative costs to the State, including the costs associated with check production, electronic payments, outstanding checks reconciliation, abandoned property compliance, and efforts the State will undertake to recover the inappropriate payments.

B. Background and Methodology

OTDA administers the New York SSP, which provides a supplemental benefit payment to SSI recipients and other qualified individuals. To be eligible for SSI, individuals must be at least 65 years old, blind or disabled, and have limited resources and income. Individuals who are eligible for SSI are automatically eligible for SSP payments. Some New York State residents who meet all but the income requirement for SSI may still qualify for SSP payments because SSP has a higher income eligibility threshold than SSI. Historically, the Social Security Administration (SSA) processed SSP payments to eligible New York State recipients on behalf of the State. Beginning in October 2014, OTDA assumed this responsibility from the SSA. Currently, OTDA processes SSP payments to approximately 700,000 recipients. Approximately 93 percent of these recipients also receive SSI payments.

To accomplish our examination objective, we used data analytics to identify payments made to SSP recipients who were reported as deceased on the VERIS Social Security Number Validation File. We also researched laws, rules and regulations applicable to SSI and SSP, and interviewed OTDA Officials to gain an understanding of SSP eligibility requirements and payment processing.

Recommendations

- 1) *Obtain sufficient, appropriate evidence to determine whether the six recipients who OTDA claims are alive are indeed alive.*
- 2) *Recover any funds inappropriately paid to deceased recipients.*
- 3) *Establish methods to:*
 - i) *advise SSA of previously unreported deaths, and*
 - ii) *prevent SSP payments to deceased individuals.*
- 4) *Work with the OUF to recover any funds incorrectly reported to the OUF under the New York Abandoned Property Law.*
- 5) *Provide information to the New York State Department of Taxation and Finance's Division of the Treasury to stop uncashed checks to deceased individuals before checks are reported to the Office of Unclaimed Funds.*

We thank the management and staff of the Office of Temporary and Disability Assistance for the courtesies and cooperation extended to our auditors. We would appreciate your response to this report by February 9, 2018, indicating any actions planned or implemented to address the recommendations in this report.

Sincerely,

Bernard J. McHugh
Director of State Expenditures

Enc: Attachment A
Attachment B

cc: Jeff Gaskell, Assistant Deputy Commissioner
Kevin Kehmna, Director of Audit and Quality Control
Kathleen Murphy, Management Specialist 2



Office of Temporary and Disability Assistance

ANDREW M. CUOMO
Governor

SAMUEL D. ROBERTS
Commissioner

BARBARA C. GUINN
Executive Deputy Commissioner

August 24, 2017

Mr. Bernard J. McHugh
Director of State Expenditures
Office of the State Comptroller
Bureau of State Expenditures
110 State Street
Albany, NY 12236

RE: Draft Report 2016-BSE7-01

Dear Mr. McHugh:

The Office of Temporary and Disability Assistance (OTDA) has reviewed the Office of the State Comptroller's (OSC) Draft Report, 2016-BSE7-01, examining benefits payments by the New York State Supplement Program (SSP) made between October 2014 through March 2016. As set forth below, OTDA disagrees with OSC's findings, and provides the following information in support of its position.

I. Background

The New York State Supplement Program (SSP) provides state-funded financial support to eligible aged, blind or disabled individuals, and until October of 2014 was part of the monthly benefit paid to most Supplemental Security Income (SSI) recipients. Before October 1, 2014, New York State residents who received SSI and SSP benefits received one payment from the Social Security Administration (SSA) that combined the federal SSI benefit and the New York SSP benefit. On October 1, 2014, the State took over from SSA the administration of its SSP, at which time SSI/SSP recipients began to receive their federal SSI benefit and the state SSP benefit separately. By making SSP payments directly instead of paying federal SSA to do so, the State saves approximately \$90 million annually in administrative costs.

OTDA now issues approximately 672,000 SSP payments to needy individuals totaling about \$50 million each month. Approximately 95% of the payments are made via direct deposit, with the remaining 5% issued via paper check. The audit period of October 2014 through March of 2016 encompasses the first eighteen months after OTDA's takeover of the administration of the SSP from SSA.

Eligibility for SSP benefits is based upon an individual's eligibility for SSI. By law, OTDA is required to accept SSA's determination of individual eligibility for SSI in establishing eligibility for SSP (see Social Services Law §209(1)(b) and agency regulations at 18

NYCRR § 398-4 and 18 NYCRR § 398-4.2). An individual's application for federal SSI benefits also serves as their application for SSP. Once eligibility for SSI is determined, the applicant is categorically eligible for SSP, and the federal government sends the relevant information to OTDA through a system known as the Statewide Data Exchange (SDX). Administration of the SSP program relies extensively on data received daily from the SSA via the SDX. The federal eligibility determinations and data feed allows the state to operate the SSP in a cost-effective manner.

*
Comment
1

It is important to note that this audit covered the first 18 months that OTDA began administering SSP. OTDA has already taken steps to improve upon the quality, accuracy and timeliness of the information received from the SSA and will continue to enhance practices, where appropriate.

II. OTDA Disagrees with OSC's Findings Re: SSP Payments

OSC contends that SSP payments totaling \$42,304 have been improperly made to 78 individuals who are deceased. OTDA disagrees with these findings.

First, eight (8) of the individuals that OSC identified as deceased are, in fact, alive, and properly receiving SSI and SSP benefits. OTDA confirmed this information using the State On-Line Query (SOLQ) system, a federal SSA system that allows authorized state agencies to conduct real-time verification of Social Security Numbers as well as access to federal Title II and Title XVI payment information. According to the SSA, the eight individuals listed on Attachment A are alive and in receipt of ongoing federal SSI benefits as of August 3, 2017. As such, they are categorically eligible for SSP benefits. OTDA requests OSC's amendment of Report 2016-BSE7-01 to remove these individuals from its findings.

*
Comment
2

Second, to the extent there were any errors with respect to the remaining SSP payments, OTDA is not at fault. OTDA made each of these payments in good faith and in reliance upon data provided OTDA by the SSA. Rather, any errors resulted from the time lag in transmittal of information from the federal government to New York State. Since the takeover of administering SSP payments in October of 2014, OTDA has found that SSA is often not timely in reporting recipient deaths via the SDX. There are frequent lags between the actual date of the recipient's death and the date such death is reflected as verified by the SSA via the SDX.

Despite the fact that OTDA is not at fault, OTDA affirmatively takes steps to address this lag. First, OTDA requests that the Division of Treasury cancel any uncashed checks dating back to the recipient's date of death. Second, OTDA obtains dates of death from other sources including the Welfare Management System (WMS) and a recipient's family members. If OTDA is informed of a recipient's death prior to receiving a similar update via the SDX, OTDA will unilaterally act to suspend recipient benefits until such time as the death is verified by SSA via the SDX.

Finally, in compiling its findings, OSC appears to rely upon information it received via the Veris Social Security Number validation system. OTDA does not have access to this system or to the files OSC received from the system. OTDA would like to explore the cost effectiveness of gaining access to this or other similar verification systems.

III. OTDA's Response to the Draft Audit's Recommendations

OSC issued four recommendations to OTDA in its Draft Report. Mindful of the limitations and concerns mentioned above, OTDA is addressing or otherwise plans to address these recommendations as follows.

Recommendation #1:

"Recover funds inappropriately paid to deceased recipients."

Response:

- As a threshold matter, SSP benefits issued during the audit period totaled close to One Billion Dollars. OSC found erroneous payments of \$42,304 (an amount which OTDA disputes because it includes eight recipients who are not actually dead). Thus, the overpayment amount cited by OSC reflects .004% of total SSP benefits issued.
- SSP is working with OSC's Office of Unclaimed Funds to develop a process to reclaim the \$12,850 in uncashed checks that were issued.

* Comment 2

Recommendation #2:

"Establish methods to:

- i) Advise SSA of previously unreported deaths, and
- ii) Prevent SSP payments to deceased individuals."

Response:

- As noted above, administration of the SSP program is heavily dependent on the accuracy and the timeliness of information supplied to OTDA by SSA over the SDX. The payments at issue were made in good faith and in reliance upon data provided to OTDA by the SSA. SSP continues to actively work with our federal partner to address identified SDX issues in a timely, comprehensive manner.
- OTDA established a collaborative process with SSA: When OTDA identifies incomplete SDX records, OTDA requests updated records from SSA. OTDA also developed a process to inform SSA of inconsistencies between State and federal data.
- When OTDA receives a report of death through unofficial channels (e.g., by a spouse or a congregate care facility representative), it suspends payment of SSP benefits until that death is verified by SSA through the SDX, at which point the SSP case is officially closed.
- OTDA has implemented an automated match process using our Welfare Management System (WMS) to identify deceased recipients before they receive payments. This process involves data matching the SSP population with death information recorded by WMS for applicants and recipients of Public Assistance and the Supplemental Nutrition Assistance Program.

- SSP continues to explore other options to more timely identify recipients who have died and the date of their death.

Recommendation #3:

“Provide information to the NYS Comptroller’s Office of Unclaimed Funds to ensure escheated funds are:

- i) Not inappropriately claimed by recipients’ beneficiaries, and
- ii) Returned to the appropriate source.”

Response:

OTDA has identified thirty-five (35) recipients whose checks, totaling \$12,850.00, have been escheated and sent to OSC Unclaimed Funds. See Attachment B. OTDA contacted Unclaimed Funds to begin the process of having those funds returned to the State general fund. OTDA is developing a process to ensure that OTDA funds are not inappropriately claimed by the deceased recipients’ ineligible beneficiaries, and that they are properly returned. SSP will identify those uncashed checks older than 12 months and will opt to stop payment on the benefits to ensure they are not considered abandoned property and forwarded to Unclaimed Funds.

Recommendation #4:

Provide information to the Division of the Treasury to stop uncashed checks to deceased individuals before checks are escheated.

Response:

This recommendation is fully implemented. OTDA is already taking this action.

In sum, the State’s takeover of the administration of the SSP program, which delivers important benefits to some of our most vulnerable and needy residents, has been a success. The program is both efficient and responsive to recipient needs, saving New York State taxpayers approximately \$90 million per year. OTDA continues to work with our federal partner and make changes to improve program efficiencies.

If you have any questions concerning our response to the draft report, please contact me at (518) 473-6035 or Kevin.Kehmna@otda.ny.gov

Sincerely,



Kevin Kehmna, Director
Audit and Quality Improvement

Attachments

State Comptroller's Office Comments on Auditee Response

1. Social Services Law, § 209(1)(b) provides that a person “properly” receiving SSI benefits is eligible for SSP. As stated in our report, we question whether an individual who died from 1 to more than 16 years prior to their last SSP payment is “properly” receiving benefits. Additionally, 18 NYCRR § 398-4 expressly provides that OTDA can consider other information available in determining SSP eligibility. Our Office used Social Security Number verification services to identify deceased individuals who continued to receive SSP benefits. Although OTDA disagrees with OSC's findings, Officials have implemented an automated match to identify deceased recipients before they receive payments and continues to explore other options to more timely identify recipients who have died. Officials also acknowledged they can take action in those instances where OTDA is informed of a recipient's death prior to receiving notice of death from the SSA. These actions suggest OTDA is not prevented from acting when SSA's information is inaccurate.
2. In their response, OTDA stated that 8 of the 78 individuals OSC identified as deceased were alive. However, subsequent to their response, Officials told us one of the eight recipients was deceased and referred the case to the Welfare Inspector General. In another case, Officials acknowledged one of the recipients was receiving duplicative benefits under his own SSN and a SSN belonging to a deceased person. In their response, OTDA claims the remaining six recipients are alive because the SSA continued to pay the recipients SSI benefits. As discussed in our first comment, we question the reasonableness of this approach for verifying SSP recipients' eligibility.



ANDREW M. CUOMO
Governor

Office of Temporary and Disability Assistance

SAMUEL D. ROBERTS
Commissioner

BARBARA C. GUINN
Executive Deputy Commissioner

February 9, 2018

Mr. Bernard J. McHugh
Director of State Expenditures
Office of the State Comptroller
Bureau of State Expenditures
110 State Street
Albany, New York 12236

RE: Report 2016-BSE7-01

Dear Mr. McHugh:

The Office of Temporary and Disability Assistance (OTDA) has reviewed report 2016-BSE7-01 issued by the Office of State Comptroller (OSC) on January 9, 2018 (the Report) which examines payments made by the New York State Supplemental Program (SSP) during the period October 2014 through March 2016.

Since taking over SSP payments from the federal Social Security Administration (SSA) in October of 2014, OTDA has updated and enhanced its practices to improve data accuracy. OSC's limited findings with respect to certain payments made to, or on behalf of individuals claimed to be deceased covers the first 18 months that OTDA administered SSP. Since that time, OTDA has taken steps to improve upon the quality, accuracy, and timeliness of the information received from SSA and will continue to enhance practices, where appropriate as the program proceeds.

Furthermore, OSC's limited findings are dependent upon information OSC obtained from the VERIS Social Security Number (SSN) Verification Services. OTDA has already advised OSC that it does not currently have access to this fee-based service and remains interested in exploring the cost effectiveness of accessing this system as to further enhance the accuracy of SSP's data.

More specifically, OTDA responds to the Report as follows.

I. **Background**

The New York State SSP provides state-funded financial support to eligible aged, blind or disabled individuals, and until October of 2014 was part of the monthly benefit paid to most Supplemental Security Income (SSI) recipients. Before October 1, 2014, New York State residents who received SSI and SSP benefits received one payment from the SSA that combined the federal SSI benefit and the New York SSP benefit. On October 1, 2014, the State took over from SSA the administration of its SSP; at which time SSI/SSP recipients began to separately receive their federal SSI benefit and the state SSP benefit. By making SSP payments directly instead of paying the federal SSA to do so, OTDA saves the State approximately \$90 million annually in administrative costs. OTDA now issues approximately 672,000 SSP payments to needy individuals totaling about \$50 million each month. Approximately 95% of the payments are made via direct deposit, with the remaining 5% issued via paper check.

Eligibility for SSP benefits is based upon an individual's eligibility for SSI. By law, OTDA is required to accept SSA's determination of individual eligibility for SSI in establishing eligibility for SSP (see Social Services Law §209(1)(b) and agency regulations at 18 NYCRR §398-4 and NYCRR §398-4.2). An individual's application for federal SSI benefits also serves as their application for SSP. Once eligibility for SSI is determined, the applicant is categorically eligible for SSP, and the federal government sends the relevant information to OTDA through the Statewide Data Exchange (SDX). Administration of the SSP program relies extensively on data received daily from the SSA via the SDX. The federal eligibility determinations and data feed allows the state to operate the SSP in a cost-effective manner.

II. OTDA appropriately stops payment to deceased individuals and takes action to recover funds

OSC overstates OTDA's procedure for paying SSP benefits to recipients who receive SSI. Although New York State statute and regulation require that OTDA deem current SSI recipients as categorically income eligible and therefore not subject to a separate eligibility determination, it is not OTDA's policy to continue making payments for recipients known to be deceased. In its response to the draft report, OTDA merely pointed out its need to rely upon SDX data along with the inherent limitations in that data set. Typically, a recipient's death is not known to OTDA until information is received via the SDX from SSA. However, despite this limitation, OTDA does take steps to immediately and manually suppress payments on cases where our agency is notified or becomes aware of reliable information concerning the death of a SSP recipient prior to receipt of updated death information from SSA via the SDX. OTDA also has written procedures in place which direct staff action when a reliable report of death is received.

OTDA's efforts do not stop there. OTDA then initiates several actions to recover funds issued after a recipient's date of death as more specifically described in the response to OSC's Recommendation #2, below.

Finally, with respect to the OSC's claims regarding specific recipients, OTDA has already taken action as described in Section III, below. However, OSC includes in its report a claim that cannot be verified. The Report states that one individual received benefits under his own social security number (SSN) and under a SSN belonging to a deceased individual. However, OSC did not provide OTDA with the name or SSN of that individual. OTDA requests this information so that it may initiate an investigation and report this case to SSA to request that SSA also investigate. If it is found that SSP benefits were issued improperly in this case, SSP will take steps to recover these funds.

It is noted that, even accepting OSC's claim that VERIS identified certain individuals as being deceased, the amount of funds OSC cites in the report as having been paid in error to deceased individuals reflects only .004% of total SSP payments issued.

III. OTDA Responses to Recommendations

OTDA disputes and/or has taken action with respect to the Report's five (5) recommendations as follows.

Recommendation #1: Obtain sufficient, appropriate evidence to determine whether the six recipients who OTDA claims are alive are indeed alive.

OTDA Response:

OTDA has obtained sufficient evidence to determine that the six individuals cited by OSC as being deceased, are in fact alive.

OTDA conducted another review of the case records for the 6 individuals alleged by OSC to be deceased. In January 2018, OTDA staff contacted the local SSA field offices in the area where each recipient resides and verified again that the SSA record did not contain a date of death for any of these individuals.

OTDA also conducted further review of each individual case. OTDA found that one of the individuals is a minor child known to the NYC Human Resources Administration, and that another of the individuals noted as deceased by OSC in the audit appeared, in-person, at the local SSA field office on January 4, 2018. OTDA also received verification from one individual's congregate care facility that the individual is alive.

Recommendation #2: Recover any funds inappropriately paid to deceased individuals.

OTDA Response:

Upon proper verification of death, OTDA initiates the following actions to identify and recover payments issued after the date of death:

- A weekly report to identify stale dated checks returned to the Department of the Treasury is run and reviewed. In accordance with NYS Division of the Treasury procedures, SSP staff submit a Request for Stop Payment, Replacement Check, Photocopy of Check, or Forged Affidavit form (TD-346) to request stop payment on these checks.
- Systems reports are generated and reviewed to identify uncashed checks that were issued after the recipient's date of death. A TD-346 form is completed and sent to the NYS Department of the Treasury to request stop payments on these checks.
- A written letter to request the return of funds is sent to financial institutions from OTDA to recover funds deposited via Automated Clearing House (ACH) after the recipient's date of death.
- Where appropriate, requests for repayment are sent to congregate care facilities and agency payees demanding the return of benefits paid to such parties after the recipient's date of death.
- OTDA intends to revise the language in the notice sent to deceased recipients discontinuing benefits to require the return of payments issued after the date of death.

Recommendation #3: Establish methods to advise SSA of previously reported deaths and prevent SSP payments to deceased individuals.

OTDA Response:

In accordance with SSA rules and procedures, OTDA completes a federal G-SSA 3911-U4 form when SSP identifies an individual who is found to be deceased based upon reliable information/reporting and the death has either not been previously reported to SSA, or has not been so reported by SSA to OTDA via the SDX. This form is sent to the appropriate local field office with a copy to the regional office. OTDA immediately suspends SSP payments in these situations.

OTDA also takes the following actions to prevent payments to deceased individuals:

- An automated system-generated death match is run against the SSP active case file prior to the creation of each month's payment file to identify newly deceased individuals and to stop payments for these individuals.

- Payments are immediately suspended on cases where OTDA has been notified of a death prior to receipt of this information from SSA.

Recommendation #4: Work with the Office of Unclaimed Funds (OUF) to recover any funds incorrectly reported to OUFG under the New York Abandoned Property Law.

OTDA Response:

As of January 9, 2018, OTDA has reclaimed 103 of the 114 payments that the OSC audit found were sent incorrectly to OUFG. The total amount recovered is \$12,092.

OTDA continues to work with OUFG to recover the remainder of the payments.

Recommendation #5: Provide information to the New York State Department of Taxation and Finance's Division of the Treasury to stop uncashed checks to deceased individuals before checks are reported to the Office of Unclaimed Funds.

OTDA Response

OTDA is working with the Division of the Treasury to stop payments on all uncashed checks issued after the recipient's date of death. Information has been provided for all uncashed checks with a payment in 2016 and these checks have been voided. OTDA is now working with the Division of the Treasury to stop uncashed checks with payment dates in 2017 before the funds are reported to OUFG.

OTDA believes that this process to identify and stop payments on uncashed checks will effectively resolve the issue of funds sent incorrectly to OUFG and will significantly reduce or eliminate the possibility that funds will be claimed by ineligible individuals or their family members after a recipient's death.

In closing, the NYS takeover of administration of the SSP program is operating successfully, delivering approximately \$50 million dollars in benefits each month to aged and disabled citizens on time and in a cost-effective manner. OTDA continues to make program and process improvements and to strengthen program integrity and oversight.

If you have any questions concerning our response to this report, please contact Kevin Kehmna at (518) 473-6035 or via email at Kevin.Kehmna@otda.ny.gov.

Sincerely,



Samuel D. Roberts
Commissioner