



Highlights of [GAO-12-420](#), a report to the Chairman, Subcommittee on Social Security, Committee on Ways and Means, House of Representatives

Why GAO Did This Study

SSA administers two of the largest federal disability programs. GAO designated federal disability programs as a high-risk area, in part because eligibility criteria had not been updated to reflect medical and technological advances and labor market changes. Given the size and cost of its disability programs, SSA needs updated criteria to appropriately determine who qualifies for benefits. GAO has been asked to assess SSA's efforts to update its medical criteria and develop a new occupational information system, and to identify other steps taken to modernize disability determination criteria. To do this, GAO reviewed relevant publications and federal laws and regulations; assessed agency plans, cost estimates, schedules, and other documentation against established project management criteria; and interviewed SSA officials, experts, and stakeholders.

What GAO Recommends

GAO recommends that SSA (1) explicitly identify resources needed to achieve its 5-year time frame for updating its medical listings; (2) follow best practices in its cost estimate, schedule, and risk assessment for the occupational information system; and (3) conduct limited, focused studies on how to more fully consider assistive devices and workplace accommodations in its disability determinations. SSA agreed with the first two recommendations and disagreed with the third, stating that such studies would be inconsistent with Congress' intentions. GAO continues to believe the recommendation has merit, as discussed more fully within the report.

View [GAO-12-420](#). For more information, contact Daniel Bertoni at (202) 512-7215 or bertonid@gao.gov.

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MODERNIZING SSA DISABILITY PROGRAMS

Progress Made, but Key Efforts Warrant More Management Focus

What GAO Found

The Social Security Administration (SSA) has taken steps that hold promise for improving the process for updating its medical criteria, but continues to face challenges ensuring timely updates. SSA now uses a two-tiered system for ongoing revisions to its medical listings. First, it completes a comprehensive review of all medical conditions listed within each of 14 body systems, making needed revisions. For subsequent updates for a body system, the agency uses a targeted approach, selecting for review and revision only those medical conditions most in need of change. To date, SSA has completed comprehensive revisions for 8 of the 14 body systems and now is reviewing conditions under them to determine where targeted revisions are appropriate. However, some of these targeted revisions have experienced delays. Moreover, SSA has yet to complete comprehensive revisions for six body systems that have been ongoing for 19 to 33 years. SSA officials attributed delays to a lack of staff and expertise, along with the complexity and unpredictability of the regulatory process.

SSA has embarked on an ambitious plan to design by 2016 an occupational information system for use in its disability decision-making process, but has fallen short of best practices for estimating costs, maintaining a schedule, and considering risks and alternatives. SSA currently relies on occupational information developed by the Department of Labor which has not had a major update since 1977. In 2008, SSA initiated a project to develop its own occupational information system (OIS), which SSA expects will provide up-to-date information on the physical and mental demands of work to support its decision-making process. To guide the creation of its OIS, SSA established an advisory panel, collaborated with outside experts and other agencies, and in July 2011 issued a research and development plan detailing relevant activities through 2016. SSA has made progress on some baseline activities in the plan. However, SSA's cost estimate and schedule had key deficiencies, such as not including any estimate of the cost of producing, maintaining, and operating the system, which can inform design options. SSA also did not adequately consider inherent risks or potential alternatives, which could heighten the risk of additional costs or project failure.

Consistent with modern views of disability, SSA has taken some concrete steps toward greater consideration of an individual's ability to function with a disability but faces constraints in fully modernizing. SSA has incorporated some criteria into its medical listings to determine whether a claimant's impairments result in functional limitations that can prohibit the ability to work. SSA is also sponsoring research through the National Institutes of Health to evaluate how functional abilities can further be considered in determining disability. One project aims to develop a computerized tool to assist adjudicators in evaluating how various impairments affect an individual's function and ability to work. However, SSA officials maintain that other modern concepts of disability cannot be fully incorporated into SSA's disability decisions. Specifically, SSA faces constraints considering the extent to which assistive devices and workplace accommodations can mitigate work disability, because these are not universally available and SSA lacks the resources to conduct individualized assessments.