

# SSA's Organizational Culture and Its Compatibility with the Mission of Returning People with Disabilities to Work

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## **Executive Summary**

With the passage of the Ticket to Work and Work Incentives Improvement Act of 1999, return to work became a central part of the Social Security Administration's (SSA's) mission. Up to that point, the Agency's culture had been one that was adapted to distributing the right check to the right person at the right time. The nature of the disability programs bred a culture in which frontline workers were: required to be skeptical of applicants' claims to eligibility for program benefits; committed to helping them through benefit payments if they were eligible; not committed to helping them return to work, regardless of eligibility; and accepting of the idea, imbedded in the medical eligibility criteria, that they could not work if they met those criteria. At worst, beneficiaries and others have characterized the frontline workers as the "Trust Fund police" – an extreme and inaccurate characterization, to be sure, but one that has a ring of truth because of SSA's role as guardian of the Social Security Trust Funds. To be successful in its pro-work mission, SSA needs to develop a pro-work culture, but one that is consistent with its responsibility to taxpayers.

SSA faces many challenges in the development of a pro-work culture. Perhaps the most difficult challenge is the nature of its income support programs. It is critical to recognize that the pre-Ticket culture was driven by the nature of those programs. Those programs, in turn, reflect a broader social culture in which disability has often been defined, however incorrectly, as inability to support one's self through work. Society's message, as embodied in the income support programs, has been "we'll help you if you do not help yourself, but not if you do." The challenge is to develop a pro-work culture in the face of income support programs that create a work disincentive and appear to perpetuate this anti-work message.

There are other significant challenges to development of a pro-work culture: other Agency priorities (Trust Fund solvency and improvements to the disability determination process) that compete for the Agency's scarce resources; the size and complexity of SSA's bureaucracy; and the highly political environment in which the Agency operates.

In this paper, I draw lessons for SSA's efforts from three other types of organizations: state welfare agencies, private disability insurers, and the National Aeronautics and Space Administration (NASA). The first two of these have missions that are similar to SSA's current mission in one key respect: they attempt to help their clients attain financial security through both income support and work.

Researchers have attributed much of the better-than-expected success of welfare reform to changes in organizational culture at the state welfare agencies, thereby demonstrating the power of cultural change. State agency culture is characterized by "tough love" paternalism toward their clients. That is, the agencies help their clients, but they also hold them accountable for helping themselves. The experience of these agencies also shows that cultural change takes a long time; occurs through the effective implementation of changes to worker responsibilities, the provision of tools and processes used to carry them out, and the rewards workers receive for performance; needs strong political support both inside and outside the agency; requires sufficient resources for implementation; can greatly benefit from good luck, as in the case of state agencies, or be set back by bad luck, as it likely has been at SSA; and should include the cultivation of relationships with other agencies and organizations that can help an agency achieve its mission.

The experience of state welfare agencies also suggests that much more fundamental change in SSA's income support programs might be needed to achieve cultural change of the magnitude that many would like to see. Welfare reform created strong incentives for non-working parents to become employed, so welfare offices observed a large surge in their client's motivation to work, and a very large share of their time quickly became devoted to helping clients enter the labor force or find better jobs. In contrast, the bulk of SSA's administrative effort for the disability programs continues to be devoted to sending the right check to the right person at the right time, through a process that fosters an anti-work culture. As implementation of the Ticket Act proceeds, frontline workers are likely to perceive that most beneficiaries are not responsive to SSA's return-to-work activities, partly because of severe medical conditions, but also because many work barriers and disincentives remain. Under these circumstances, we can hardly expect pro-work cultural change to permeate the Agency or to reach far beyond its borders.

Although there are many differences between SSA's responsibilities and those of private disability insurers, the latter appear to offer a useful model for how an organization can pursue both an income support mission and a return-to-work mission. Insurer claims management is fundamentally different from SSA's claims management. Claims management teams are responsible for both making fair eligibility determinations and taking steps to help the claimant return to work, and well-developed performance management systems ensure that the team pursues both of these objectives well.

The experience of private disability insurers also reinforces two lessons from state welfare agencies. The first is the need to provide SSA with adequate resources to fulfill its mission. It appears that SSA's administrative expenses per dollar of benefits paid are much lower than those of private insurers. The second is that fundamental changes to address the anti-work nature of the disability programs might be necessary before SSA can successfully move to a pro-work culture. Private disability benefits are time-limited in a substantial way, although they can be extended, and there is a clear expectation that most beneficiaries will attempt return to work.

The lessons to be learned from NASA, and the recent crash of the Challenger, demonstrate the importance of the political environment to an Agency's culture. The independent review board that investigated the Challenger accident placed part of the blame on the White House, Congress and NASA leadership that a) exerted constant pressure to cut costs while demanding that NASA meet its goals, and b) created a high level of uncertainty about future plans. SSA faces similar challenges, and it is not clear how they can be overcome.

SSA has, in fact, taken numerous steps that will help move cultural change in a pro-work direction, although change is much slower than most people inside and outside the Agency would like to see. Certainly the Agency's leadership strongly supports the return-to-work mission, and has conveyed that message to managers and frontline workers by setting specific return-to-work goals, conducting extensive training, collaborating with other agencies and organizations in its return-to-work efforts, and addressing several long-neglected system issues related to return to work. The Agency is taking seriously the need to be responsive to problems encountered by Employment Networks (ENs) and state vocational rehabilitation (VR) agencies, such as the recently announced changes to earnings reports required for Ticket payments, as these providers attempt to learn how to operate under Ticket to Work. SSA also is moving forward with plans to conduct new return-to-work demonstrations, and studying how private disability insurers manage their claims.

The Agency's current strategic plan includes the goal of developing and implementing a better performance management system, with an array of performance measures for managers and frontline workers, and a system to reward superior performance. Inclusion of measures and incentives to promote the return-to-work mission in that system might substantially help the Agency to develop a pro-work culture.

SSA will eventually need to integrate some of its outsourced return-to-work functions into its own operations if it is to make substantial progress in the development of a pro-work culture. This might be difficult, in part because the Agency's culture has been focused on eligibility. Although outsourcing much of this work might make sense for other reasons, a consequence is that frontline workers inside the Agency continue to focus primarily on eligibility issues. Inevitably, this will perpetuate the Agency's existing culture and the beneficiary distrust that the determination process engenders.

Significant additional resources, visibly targeted at return-to-work activities, would help move the Agency's culture in the desired direction. In the current political climate, however, the Agency is unlikely to obtain such resources unless those resources can be expected to pay for themselves through benefit reductions, or unless there is exceptionally strong outside support for other reasons.

Ultimately, substantial policy changes that directly address the anti-work features of SSA's income support programs -- and make work pay -- will be needed before SSA can develop a culture that is as supportive of work as many would like it to be.

## I. Introduction

Since its inception, the Social Security Administration's (SSAs) mission has been to provide economic security *by means of income benefits*, initially to retired workers and dependents (under Old Age and Survivors Insurance, OASI). This was extended to workers with disabilities and dependents in 1956 (under Social Security Disability Insurance, or SSDI), and to low-income elderly persons and persons with disabilities in 1974 (under Supplemental Security Income, SSI). Throughout, the Agency's focus has been to send "the right check to the right person at the right time" – a well-known mantra at SSA. Although SSA has had some experience in encouraging work and self-support for beneficiaries with disabilities, through the SSDI and SSI work incentive programs and its cost-reimbursement payments for vocational rehabilitation (VR) services, return to work had never been perceived as central to the Agency's mission prior to the 1999 Ticket to Work and Work Incentives Improvement Act (the "Ticket Act"). The Ticket Act requires the Agency to take an additional approach to providing economic security for its beneficiaries with disabilities, by helping them return to work. Thus, return to work has become a significant component of the Agency's mission.

For an organization to be successful in the pursuit of its mission, it must develop and foster a culture that is consistent with that mission. That is, its leaders and managers must cultivate an environment in which workers routinely make decisions and take actions that support the organization's mission, rather than pursuing other objectives.

There are two recent, prominent examples of how an organization's culture can affect its success in achieving its mission – one a spectacular and tragic failure, and the other a better than expected success. The first is the crash of the space shuttle Columbia. The recently released report of the Columbia Accident Investigation Board (CAIB) squarely blamed the culture at the National Aeronautics and Space Administration (NASA), and pointed out that the same cultural problems were the root cause of the Challenger crash nearly two decades earlier (CAIB 2003). The Board found that NASA has a "can do" culture that rewards employees for meeting deadlines and accomplishing challenging tasks despite insufficient funds. In that environment, it was easy for employees to become complacent about safety issues and ignore warning signs that, if heeded, would have prevented these crashes. While NASA's culture likely contributed to its short term program successes, these two crashes have had devastating impacts on its longer-term achievements.

The second example comes from the reform of welfare for families with children – the transformation of Aid to Families with Dependent Children (AFDC) to Temporary Assistance for Needy Families (TANF), which was accompanied by 1) a major expansion of the Earned Income Tax Credit for working parents with low earnings, and 2) associated reforms to Medicaid, Food Stamps, housing and many other programs. Even critics of welfare reform would agree that the positive impacts of the reforms on employment and earnings of low-income parents, and the reduction in their families' dependence on welfare payments, have been remarkable – much greater than almost anyone had anticipated.

Most students of welfare reform point to changes in the organizational culture at state welfare agencies as a major contributor to the unexpectedly large impacts. Changes varied by state, and were much greater in some states than in others. In general, however, the orientation of

case workers and other welfare agency employees changed from a focus on determining a family's eligibility and the appropriate amount of income support, to requiring, encouraging and providing support for the parents' efforts to obtain or retain jobs and increase their earnings.

SSA's organizational culture has evolved in ways that reflect its historical mission, and it would be surprising if that culture were consistent with a new return-to-work mission. Providing income to those who qualify because they meet complex medical and vocational criteria and do not work above SGA is fundamentally different than -- some would say inherently in conflict with -- encouraging and helping the same individuals increase their earnings to a self-supporting level. Before the passage of the Ticket Act, the organizational culture was supported by organizational structures, processes, managers, staff, equipment and other resources that had been developed to provide income support. There is really no question that the pre-Ticket culture needed to change substantially for the Agency to be successful in the implementation of its new mission. The important question to address is how SSA can adopt an appropriate "pro-work" culture -- one that promotes the Agency's new return-to-work mission, but that also supports its income benefits mission.

In Section II I discuss the many challenges that SSA faces in changing its culture to support its return-to-work mission. In Section III we consider what can be learned from experiences in other organizations. Most of the section is devoted to state welfare departments and their responses to welfare reform. Although there are critical differences in the target populations of welfare reform and the Ticket Act that we should not lose sight of, welfare reform's main objective for low-income families is the same as the Ticket Act's main objective for people with disabilities -- to increase their ability to support themselves through work, and reduce their dependence on income support. Hence, state welfare agency efforts to change their own culture in response to the change in their mission might be instructive for SSA and others interested in promoting the success of SSA's return-to-work efforts. I also consider private disability insurers -- which, like SSA, face the challenge of both providing income support to people with disabilities and helping them return to work -- and briefly return to the example provided by NASA. Although NASA is in a fundamentally different line of business than SSA, I believe there are important lessons to be learned from the way that the space program culture outside of NASA influences NASA's internal culture. I conclude the paper with a discussion of steps SSA has taken that are supportive of cultural change, and discuss changes the Agency and others might consider in the future.

In preparing this paper, I interviewed SSA staff in various offices, as well as people outside of the Agency who are involved with SSA's return-to-work efforts. The paper also draws extensively on my 11 years of experience in conducting policy research on SSA's disability programs, including numerous opportunities to directly observe the Agency's pre-Ticket culture and operations at all levels. The paper specifically draws on findings from an SSA-funded project concerning the Agency's performance management system (Stapleton and Pugh 2001), and on our work to design SSA's evaluation of the Ticket to Work (TTW) program (Stapleton et al. 2003), which includes a process evaluation of implementation in Phase 1 states (Livermore et al. 2003). I am currently a co-PI for SSA's TTW evaluation itself.

## II. Challenges to the Development of a Pro-work Culture

It takes a long time to change an organization's culture, and there are many obstacles to overcoming the inertia of an organization's existing culture. SSA faces some particularly difficult challenges in this regard.

### *The “anti-work” nature of the disability income support programs*

The most fundamental of these challenges is the nature of the disability income support programs themselves. They are, in effect, “anti-work” programs. Conceptually, eligibility for these programs is based on the medical model – which states that it is possible to determine from medical evidence whether a person is able to work at the substantial gainful activity (SGA) level. Applicants who meet non-medical criteria for eligibility and who are determined to satisfy complex medical criteria – “meet or equal the Listings” -- are presumed unable to work at the SGA level unless evidence indicates that they are actually receiving earnings above the SGA level, or participating in an equivalent activity (e.g., as a volunteer). Yet there are thousands of people who work above SGA and have obvious conditions that satisfy the medical criteria (e.g., anybody who is blind, deaf, or unable to walk, among others). Those who satisfy the medical criteria, but who can work above SGA, are faced with a choice: self-support through work, or reduced earnings supplemented by income benefits. The latter can mean lower total income, yet might be preferred to the former because of the time, effort, and other demands of work. The result is that these programs encourage people not to work.<sup>2</sup> How is it possible to establish a pro-work organizational culture in a program whose main component is fundamentally anti-work?

Because of the anti-work nature of the income support programs, the relationship between SSA and the applicant or beneficiary can become adversarial around the issue of the individual's ability to work. The individual has a vested interest in demonstrating inability to work, and the Agency has a responsibility on behalf of taxpayers to protect the integrity of the program. In a very large share of cases, it is difficult to establish that an applicant satisfies the medical criteria (e.g., for many applicants with lower back disorders, psychiatric disorders, or chronic illnesses). In such cases, the applicant, often with support from his or her medical provider, attorney, or other advocate, tries to present convincing evidence of inability to work. In such cases an SSA employee, or a state Disability Determination Service (DDS) employee acting on SSA's behalf, tries to judge the credibility of that evidence. The same scenario often arises during continuing disability reviews.

Such scenarios have bred a high level of distrust toward SSA among applicants/beneficiaries. Many suspect that SSA efforts to help them work are not in their own

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<sup>2</sup> Burkhauser and Wittenburg (1996) detail the nature of the income trade-offs faced by people with disabilities. These programs' links to public health insurance exacerbate these trade-offs. While the latter were partially addressed by provisions of the Ticket Act, they have not been eliminated. Some observers have argued that the work disincentives associated with the disability programs are low, because mean replacement rates (benefits relative to pre-disability earnings) are low (see, for instance, the National Academy of Social Insurance's Disability Policy Panel; Mashaw and Reno, eds., 1996), but this neglects three important facts: replacement rates for individuals with low wages can be quite high; pre-disability earnings is an unrealistically high measure of potential post-disability earnings for many individuals; and many individuals with higher earnings also have private disability insurance wrapped around SSDI, usually with a replacement rate of 60 percent. See also Autor and Duggan (2003) for a recent analysis of how unintended increases in the replacement rate for low-wage workers have affected SSDI participation.

best interest. One interviewee expressed the problem succinctly: “Work doesn’t pay, so SSA has to protect the Trust Fund from the undeserving – nail them if they show any sign of work. No wonder beneficiaries, providers and advocates don’t trust SSA. In their eyes, SSA staff are the Trust Fund police.”<sup>3</sup>

Some SSA/DDS workers also display a high level of distrust with respect to the abilities and motivations of applicants and beneficiaries. That attitude seems to be especially prevalent among DDS disability examiners, who make initial medical determinations, and with particular regard to SSI applicants. At the same time, however, most SSA/DDS employees have a firm belief that those who legitimately satisfy the medical criteria deserve to receive their benefits as quickly as feasible – an attitude that is perhaps missed by many applicants and beneficiaries because of their distrust. Many SSA/DDS employees are also skeptical, however, that those who meet the medical criteria can work; after all, these employees have been taught to presume that those who a) are not working, and b) satisfy the medical criteria, cannot work. They apply that presumption on a daily basis.

### ***Competition with higher priorities for scarce Agency resources***

The second most important challenge to development of an appropriate pro-work culture is the fact that return-to-work efforts are competing for scarce resources with two higher-priority items that were on the Agency’s agenda before TTW. The first of these is the projected imbalance of the OASI Trust Fund. For many years SSA’s actuaries and the Trustees have projected that the Trust Funds will be insufficient by a substantial margin to pay retirement benefits when the baby boom generation enters retirement (SSA 2003c).

The debate about how to address this issue has been the focus of public attention, and is likely to be the number one concern of SSA’s leadership for years to come; in fact, it is, and will continue to be, among the top policy concerns of the Administration and of Congress. Although this debate does not appear to have an effect on the daily activities and attitudes of frontline workers, it clearly does command a large share of the Agency’s leadership resources.

The Agency’s second highest priority item is improving the disability determination process. Because of high costs, long processing times, and concerns about determination accuracy, SSA launched a major effort to redesign the disability determination process in 1994. That effort has been much less successful than anticipated, and the problems that led to the redesign effort have not disappeared. Worse yet, the baby boom generation has started to enter the age range in which disability onset and SSDI application are most likely to occur. As a result, a very large share of the Agency’s administrative budget, and much of the leadership’s attention, must be devoted to addressing this issue.

Given the importance of these two priorities and the Agency’s limited resources, when SSA leadership and managers are faced with choices about how to allocate their time, their employees’ time, and other resources, they have strong incentives to favor these priorities over return-to-work efforts. An example of the impact of this situation is the fate of the Employment Service Representative (ESR) position. SSA developed a plan to post an ESR in each Field

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<sup>3</sup> As those familiar with the financing of SSI and DI know, federal SSI payments are not funded from a Trust Fund, but rather from general federal revenue, so “Trust Fund police” is a misnomer when applied to both programs, as was clearly the intent of the speaker.



Office, who would specialize in work-related issues, provide information about work incentive programs to applicants and beneficiaries, process post-entitlement work-related cases, etc. SSA's internal evaluation of an ESR pilot test was very positive, but full implementation would eventually have required the creation of more than a thousand new positions. The Agency instead implemented a more economical plan that involves a) fifty-seven Area Work Incentive Coordinators (AWICs), one for each SSA area office, with two for a few selected areas; and b) designation of an existing worker in each field office as the office's Work Incentive Liaison (WIL) to the AWIC. In most offices the latter will continue to devote a large share of his or her effort to claims processing.

More generally, Field Office and DDS managers are under enormous pressure to increase workforce "productivity," measured by the number of determinations cleared per employee. Clearing cases has become the driving force in these offices. Unless managers have incentives to do otherwise, they are likely to use all resources at their disposal to increase the volume of cases cleared.

### *The size and complexity of SSA's bureaucracy*

A third significant challenge is that SSA is an enormous, complex bureaucracy, designed and developed to further its income support mission. In FY2002, the Agency distributed OASI and SSDI benefits of \$442 billion, plus an additional \$46 billion for SSI payments and administrative costs, for total outlays of almost half a trillion dollars. This sum constituted 24 percent of all government outlays that year.<sup>4</sup> Almost 50 million people, including about 10 million children and working-age adults with disabilities, received income support benefits. The Agency operates a network of about 1,500 regional and local offices, and has about 65,000 employees. In addition, SSA uses DDSs in all states to process medical determinations; collectively, the DDSs have another 15,000 employees (SSA 2003b, Chapter II).

Any organization of this size will find change enormously difficult. Several specific aspects of SSA's structure are worth noting. The first is that SSA has 10 major offices each headed by a Deputy Commissioner who reports directly to the Commissioner. In the organizational management literature, this is often referred to as a "silo" structure. All of the DC offices have some responsibility for every SSA program. Of relevance to SSA's return-to-work efforts, the Office of Employment Support Programs (OESP), which is in the Office of the Deputy Commissioner for Disability and Income Security Programs, has lead responsibility for return-to-work efforts, but many other offices have very significant roles. The Office of the Deputy Commissioner for Operations, which manages SSA's regional and local offices, has responsibility for implementing many of the activities associated with return-to-work efforts; the Office of the Deputy Commissioner for Systems is responsible for implementing necessary changes to the management information, telecommunications, and other systems; the Office of the Deputy Commissioner for Human Resources is responsible for recruiting, training, workforce assessment, and other human resource activities; and the Office of the Deputy Commissioner for Finance, Assessment and Management has responsibility for developing, assessing and managing budgets. Other offices also have return-to-work roles.

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<sup>4</sup> Government outlays include both "on-budget" and "off-budget" items, and OASI and SSDI benefits are off-budget. Source: Office of Management and Budget (2003).

In a silo structure, each office must cooperate to achieve the objectives of a single program. As the managers and staff in each office are directly responsible to the leadership of their office, and not the program's leadership, conflicts in priorities must be expected. Obtaining and maintaining cooperation requires extensive time and effort across offices on the part of leadership and management. Some leaders and managers can have entrenched interests that thwart cooperation.

Like any such organization, SSA also has extensive and complex systems and processes in place to support its past mission, and changing those systems and processes would require extensive time and effort even with full cooperation and abundant resources. Thus, for instance, development of the desktop software and management information systems needed to implement TTW has been a significant challenge, in part because these systems must interface with a complex system that was designed to support multiple other objectives.

Such complex organizations often have groups of internal stakeholders that operate outside the management structure, and SSA is no exception. Several labor unions – most notably the American Federation of Government Employees and the Association of Administrative Law Judges – have their own objectives, and can exert influence over Agency activities in a variety of ways. Each DDS reports to its State's governor and has a significant stake in any program changes. Cooperation among all of these stakeholders is needed to effectively implement changes to the Agency's mission.

### ***SSA's political environment***

A fourth challenge to development of a pro-work culture is that SSA operates within a highly political environment. Implementation of a new program requires steady leadership and dogged pursuit of a long-term goal, but SSA's leadership is subject to the winds of political change. The Agency's Commissioner is appointed by the President for a six-year term. Although both the Agency's independence from other federal agencies and the Commissioner's six-year term are intended to provide the Agency with leadership that is somewhat insulated from short-term, partisan politics, that insulation is far from complete. The last change in leadership coincided with the 2000 election. SSA went through a lengthy period without a new Commissioner,<sup>5</sup> and an even longer period without new Deputy Commissioners, during a period when much work needed to be done to implement Ticket Act provisions on schedule. This was one cause of the delay in TTW's implementation. Although the Agency's new leadership has shown a strong commitment to return to work (see the last section), it is no surprise that the change resulted in some loss of continuity with respect to Ticket Act implementation efforts.

The influence of politics extends beyond SSA's leadership. Members of Congress have an interest in helping their constituents in their dealings with SSA. Their requests to the Agency on behalf of specific individuals can be a significant distraction to managers and frontline workers. Members of Congress and state governors also have an interest in the policies that impact state and local government. Thus, for instance, Agency rules and regulations that affect state VR agencies or other state agencies are likely to command representatives' and governors' interest. The courts play a very significant role in protecting the rights of people with disabilities,

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<sup>5</sup> Commissioner Barnhart took office in November 2001, 11 months after Commissioner Apfel's term ended.

and Agency actions are always under court scrutiny. Litigation can be extremely costly, so the Agency expends considerable effort to avoid it. Advocacy organizations also have a strong interest in Agency policy and operations, and they wield substantial influence with the Congress, the Administration and the voting public. Thus, there are many external stakeholders whose opinions SSA leadership must consider when making implementation decisions about any policy.

One aspect of the political climate that transcends the change in administrations is a strong push to control growth in government spending. Congress mandated that SSA implement the Ticket Act, but did not appropriate additional administrative funds specifically for that purpose. The Agency was already struggling with large disability determination backlogs before the Ticket Act was passed, so moving a share of fixed resources into implementation of the Ticket Act necessarily came at the expense of efforts to address that problem. One way leaders can change an organization's culture is to visibly commit major resources to that effort; i.e., "put your money where your mouth is." In the current political climate, it is very hard for SSA managers to ask their political leadership for more resources, because it is even harder for that leadership to ask the Office of Management and Budget and, ultimately, the President and Congress for more resources.

The Agency's many internal and external stakeholders make it very difficult to implement change -- even if there is broad support for the direction of change, as in the case of the Ticket Act -- because of their diverse and sometimes conflicting objectives. This was evident in the development of the TTW regulations, a process that attracted much public comment and substantially contributed to implementation delays.

### **III. Lessons from Other Organizations**

#### **A. State Welfare Agencies**

##### *A brief history of family welfare policy*

AFDC was initially authorized by the Social Security Act of 1935 to provide income support to families in which the father was unavailable to provide support due to death, disappearance, or disability.<sup>6</sup> At a time when it was rare for mothers to work outside the home, there was no expectation that mothers should work to support their families. AFDC was administered by states, with the federal government paying a substantial share of the benefits.

Caseloads grew extensively over the years, in part because of eligibility expansions, but also due to growth in the proportion of mothers who were unmarried. From 1960 to 1977, the program quadrupled, from about 800 thousand families to over 3.5 million.<sup>7</sup> The value of benefits also increased, in large part because AFDC became the gateway for families to obtain access to in-kind benefits, especially Medicaid and Food Stamps. Most state welfare offices developed integrated application and administrative processes, and federal law made AFDC families automatically ("categorically") eligible for both Food Stamps and Medicaid.

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<sup>6</sup> More detailed descriptions of family welfare policy prior to PRWORA appear in Moffitt (1992) and Blank (1997).

<sup>7</sup> Caseload numbers are from Department of Health and Human Services (2002), Appendix A.

The fiscal consequences of AFDC caseload growth, along with broader concerns about the number of children being born and raised in poverty, and the development of a poverty culture, led to substantial reform efforts. In the 1970s and 1980s, these primarily took four forms: 1) some tightening of eligibility and more careful screening for eligibility; 2) efforts to establish paternity and obtain child support; 3) substantial investments in education and training; and 4) reductions in the work disincentives inherent to the benefits structure. The latter two deserve further discussion because they are broadly analogous to current efforts to increase the earnings of people with disabilities, and to reduce their reliance on income support.

By the 1970s it was becoming more “normal” for mothers to help support their families through work. It was recognized, however, that many mothers in welfare families, as well as fathers who were not providing support, had very low levels of education and skills – i.e., “human capital.” Hence, investment in their human capital appeared a promising approach to helping them lift their families out of poverty and into economic independence. It was also recognized that AFDC and related programs created a disincentive to work. As a family’s earnings grew, benefits would fall – sometimes by almost as much, or even more, than the increase in earnings. Economists cited this “implicit tax” as a main reason for low employment rates among unmarried mothers. Reforms to address disincentives included reducing the rate at which earnings increases were offset by AFDC benefit reductions, de-linking other benefits (especially Medicaid) from AFDC eligibility, and providing support for childcare that might be necessary when there was no parent at home because of work.

Despite these reforms, caseloads continued to grow, reaching 5.0 million in 1994.

### ***Recent welfare reforms***

Backed by strong public support, some states began experimenting with more radical welfare reforms in the early 1990s, under federal waivers. Among other things, these included the new principle that parents had a responsibility to support their families through work, or to at least try. Some states started to actively divert low-income families from entering the welfare rolls, and/or launched efforts to move parents into employment as quickly as feasible. In 1993 Congress passed legislation to greatly increase the Earned Income Tax Credit for parents, to “make work pay;” i.e., to make work a better option than welfare for low-skill mothers and fathers. In 1996, a Republican Congress and Democratic Administration enacted the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), which replaced AFDC with TANF.

TANF embodied the concept that mothers, as well as fathers, were responsible for supporting their families through work, and the objective of the program was to help them do that. This change reflects a broader social change – over the many years since the passage of the 1935 Act, employment has become the norm for married mothers, rather than the exception. Reflecting this philosophy, PRWORA placed a five-year time limit on TANF payments to families, allowing states to exempt a small share of recipients for reasons such as disability. It also changed federal funding from the cost-share system of AFDC to the TANF block grants, under which states receive a fixed amount of funding regardless of the size of benefits paid out to recipients. The legislation also imposed work requirements and allowed states to sanction families that did not comply. Within these (and other) parameters, states were given much greater latitude than before with respect to implementation, and the block grants created a strong incentive for the states to find ways to increase employment and reduce caseloads.

The decline in TANF caseloads and contemporaneous increase in employment of unmarried mothers have been called “stunning” by one leading welfare researcher (Blank 2002), and are clearly much greater than almost anyone expected (see, for instance, Besharov 2003; Hotz and Scholz forthcoming; and Moffitt 2002). By 2001, the TANF caseload was down to 2.1 million – a drop of 59 percent from the 1994 peak. The employment rate of unmarried mothers increased from 68 percent in 1994 to 78 percent in 2001 – greatly exceeding the small growth in the employment rate for married mothers during the same period (from 69 percent to 71 percent) (Blank 2002).

Researchers who have studied the causes of these trends broadly agree that the welfare reforms, the 1993 Earned Income Tax Credit (EITC) expansion for low-income working families, and seven years of strong economic growth between 1993 and 2000 each contributed substantially to the increases in employment for unmarried mothers and the declines in TANF caseloads -- although there is disagreement about the relative importance of these three factors (Blank 2002, Moffitt 2002, Besharov 2003, and Hotz and Scholz forthcoming).

Considerable research has been conducted on how states implemented their welfare reforms. One widely accepted conclusion is that the changes in state welfare delivery systems were extensive, and help account for the unexpectedly large impacts of welfare reform. A critical aspect of these changes is a marked change in state agency culture: from one in which the primary objective of managers and workers was to see that only those who qualified for benefits received the right payment on a timely basis, to one in which the primary objective was requiring and helping parents to support themselves through earnings.

### ***The specifics of changes in state welfare offices***

Much work has been done to document what happened at state welfare offices in the 1990s (see, for instance, Fossett, Gais and Thompson 2002; Martinson and Holcomb 2002; and Lurie 2001). It is difficult to distinguish change in organizational culture, *per se*, from the many specific changes in processes, program rules, and organizational structure that occurred. To some degree they are inextricable – one cannot occur without the other. Changes are not the same in every state, and no complete survey has been done, so it is only possible to report what appear to be general findings from multiple studies.

Changes begin at the “front door” – at the very beginning of the benefit application process. Instead of just accepting applications and determining eligibility, as in the past, the intake worker’s job is to send the message that employment is expected, and, if possible, help the applicant obtain work right away, thereby diverting the family from TANF. Methods used to accomplish this objective include: making sure the applicant understands TANF work requirements, time limits, and other features; requiring an immediate job search and/or attendance at job search classes; provision of information about employment support and other supports available from the welfare agency, other state agencies and local organizations (including child care, transportation, Medicaid, Food Stamps, and the EITC); and one-time payments in exchange for an agreement not to reapply for a specified period (Lurie 2001). For diversion to work well, it was necessary for intake workers to guide their own actions by asking themselves “How can I help this person work and stay off the rolls?” rather than “Is this person eligible, and for how much?” This change in workers’ thought process represented a fundamental cultural change in the organization.

States also made substantial changes for families that were already “inside the front door” (i.e., receiving benefits), with the primary objective of helping the family exit TANF through earnings or some other source of support. They now require participants to sign Personal Responsibility Agreements concerning parental responsibilities – especially working to support their children. Caseworkers had to become more paternalistic in their approach to a family – an approach that might be characterized as “tough love.” That is, they help parents, but also hold parents strictly accountable for helping themselves. Caseworkers can, and often do require such things as participation job search training, job search, and even unpaid work experience. Participation in longer-term education and training activities has been markedly curtailed. Caseworkers can also require parents to attend classes on parenting, money management, life skills, family planning, and health. They can require parents to enter substance abuse counseling and treatment and to refrain from substance abuse. They can also require medical checkups, immunizations, and school attendance for children, and can impose sanctions for non-compliance, especially with work requirements.

The caseworker position changed from one of “eligibility clerk” to “case manager” (Martinson and Holcomb 2002). Caseworkers became responsible for assessing employability, identifying barriers to work, monitoring participation, and coordinating work-related services. Caseworkers also became responsible for providing families with accurate information about work incentives, the EITC, and continued eligibility for Food Stamps and Medicaid after they exited TANF (Fosset et al. 2002). Many states created two specialty positions, with one responsible for the caseworker’s traditional clerical functions and the other responsible for the new case management functions (Martinson and Holcomb 2002).

Change also occurred at the “back door” as welfare recipients exited the rolls. Initially, many welfare leavers lost Medicaid and Food Stamp benefits, even though they remained eligible, and they did not take advantage of child care and other assistance available to them. State welfare agencies have now substantially fixed the problems that triggered automatic benefit loss, and some have engaged in aggressive efforts to help leavers take advantage of other services (e.g., via call centers and extended case management). However, back door changes often lose in the competition for resources with front door and inside the door reforms (Lurie 2001).

States accomplished these changes in varying degrees and at varying speeds. Typically, but not uniformly, agency leaders backed the rhetoric of welfare reform with changes in systems and provision of the resources needed to support the new responsibilities of frontline staff. Computerized information systems were revamped to reduce the time spent on clerical matters and increase the accuracy of information collected. Intake workers received extensive training to learn both the new rules and how to be productive case managers. Some states increased the use of home visits so the intake worker could better assess the family’s needs and work capacity. The application process itself was changed so that TANF was no longer the gateway to Food Stamps and Medicaid; simplified, clearer processes made it easier for intake workers to determine eligibility for these programs independently of TANF eligibility (Fossett et al. 2002). Welfare offices extended hours and expanded phone services to provide greater convenience to the applicants and to reduce backlogs. Obviously such steps required additional resources, but states were able to purchase enhanced services with money from the block grants and benefit savings. State agencies faced considerable challenges in implementing performance accountability, and

the complexity of the new set of services they provide has hindered the development of performance management systems.

Services to support those with significant challenges (disabilities, substance abuse and other dysfunctional behaviors, lack of English language skills) and to discourage out-of-wedlock childbearing need to come from outside the welfare office, from DOL, state VR agencies, schools, colleges, mental health agencies, substance abuse treatment agencies, developmental disability agencies, and charitable community organizations. Increased recognition of service needs by frontline workers and expanded sources of support have been an important element of reform in most states.

One other important aspect of changes at state welfare offices deserves attention: agency cultivation of relationships with other agencies and community organizations. Martinson and Holcomb (2002,) write that the “most striking institutional change is the development and expansion of organizational linkages to fulfill new policy objectives and work program requirements.” State welfare agencies recognized early on that they were not equipped to provide all the services that recipients needed, and turned to other state agencies (e.g., workforce development agencies) and community organizations for help. A few contracted with for-profit firms to manage their programs or provide case management services. Some efforts were made to integrate and coordinate rules and program administration. Many state welfare agencies gave case managers the authority to refer recipients to other programs. Some co-located their offices with those of other state agencies. Agency leaders, managers and frontline staff all needed to develop a more outward, open mentality towards other agencies and organizations, in one way or another. They needed to become more familiar with the services these entities could provide to low-income families, and how families could access those services; many needed to interact with those entities on a daily basis. They also needed to foster mutual trust between the welfare agency and other entities – a difficult challenge because of prior disinterest or, in some cases, conflicting objectives.

Three key factors have been identified in the extensive institutional change that occurred during welfare reform. The first is the availability of funding to support the change, made available by declining caseloads and block grants. The second is the high level of discretion that states had in spending the block grant funds, and the fortuitously large size of those funds relative to need. The third is ardent political support for state agencies to change their approach and deliver a broader, more complex set of support services (Martinson and Holcomb 2002).

### ***Lessons for cultural change at SSA***

Although the family welfare reforms represented by the EITC and TANF are much more ambitious than the reforms embodied in the Ticket Act, the experiences of state welfare agencies in changing their cultures contain numerous lessons for SSA’s effort to change its culture.

The first is that *cultural change within an organization can make a powerful contribution to success in achieving a new mission*. Although nobody will ever be able to measure the exact size of the contribution of cultural change toward welfare reform impacts family earnings growth and declines in dependence, most observers agree that it was substantial. Hence, pursuit of cultural change at SSA can be well worth the effort.

The second lesson is that *cultural change takes a long time*, especially when complex changes to program features and processes are required. We should expect SSA to need years,

not months, to get the job done. Those of us outside the Agency need to exercise patience, but also look for signs of progress.

The third lesson is that *cultural change occurs through the effective implementation of changes to worker responsibilities, the provision of tools and processes used to carry them out, and the rewards workers receive for performance.* Cultural change is not accomplished by flicking a switch or simply announcing to workers that the organization's mission has changed. Cultural change in state welfare agencies was brought about by the myriad of changes that these agencies made at the operational level, summarized above.

The fourth lesson is that *strong political support for change, both inside and outside SSA, is critical.* Although there were differences of opinion about welfare reform, the reforms that were passed had widespread bipartisan support. The Ticket Act and its objectives also have widespread bipartisan support. Nonetheless, to be a constructive force in helping SSA achieve its new mission, the Administration, the Congress, beneficiaries, and their advocates must continuously and consistently reinforce the message that they want SSA to put a high priority on return to work. Inside the Agency, SSA's leaders must clearly transmit that message to both managers and frontline workers, by what they do, as well as what they say.

The fifth lesson is that *strong political support for change must be backed by the resources needed to implement change.* The leaders of state welfare agencies were fortunate to have the resources they needed, because of the block grants combined with early success in reducing caseloads. The effectiveness with which they used the resources varied, but success was achieved in varying degrees. Resources are needed to train SSA's frontline workers so that they know how to perform their new responsibilities; they understand that a high-priority part of their job is to encourage and facilitate return-to-work efforts; and they convey accurate information about return-to-work programs and policies to beneficiaries. Resources are also needed to develop and implement new processes; develop and provide the new tools needed to carry out those processes; develop new ways of monitoring and rewarding performance; reach out to other agencies and organizations that can help beneficiaries return to work; and reach out to the beneficiaries themselves.

A sixth lesson, related to the previous one, is that *good luck helps.* For the state welfare agencies, good luck came in the form of the EITC, and the exceptionally strong economy. As indicated earlier, researchers have established that these two factors contributed substantially to a decline in caseloads. That meant that the agencies could use their block grants to invest in program change and provide the supports that some families needed to enter employment and exit TANF, instead of paying benefits. From the perspective of frontline workers, it also meant the reward of success.

Unfortunately, SSA's implementation of the Ticket Act has encountered exceedingly bad luck. The economic downturn is probably having an adverse impact on the earnings success of beneficiaries who use their Tickets, which is discouraging for beneficiaries, costly to providers, and disappointing to all inside and outside SSA who have invested heavily in promoting and implementing the program. The recession is also having an adverse impact on state programs that might otherwise be making a greater contribution to improving outcomes. The most prominent example of the latter are the state Medicaid agencies, many of which started to implement Buy-in programs only to later delay them, increase their premiums, or otherwise limit implementation. The events of September 11, 2001 had an immediate adverse impact on the



rollout, and the eventual consequences of both that event and the recession for the federal budget make the availability of additional administrative resources in the future even less likely. Some ENs are no doubt also having financial difficulty because of reduced business or funding from other sources, making it harder for them to weather likely short-term losses for the Ticket. The recession has likely increased SSA's application workload substantially, as it has in past recessions. Another piece of bad luck is the fact that the baby boom generation has started to reach the age range in which disability onset, and SSDI application, are most likely to occur -- further increasing demands on SSA resources. It is not possible to willfully change SSA's luck, but it is important to keep the likely substantial impact of bad luck in mind as we assess the Agency's progress.

The seventh lesson is that *cultural change should include the cultivation of relationships with other agencies and organizations that can help SSA achieve its new mission*. State welfare agencies recognized the need to engage other entities in their efforts, and many did so effectively. SSA has a very similar need, and its efforts are likely to be most successful if it works collaboratively with the many agencies and organizations that provide a wide variety of services to people with disabilities. This includes, most obviously, offices in the Departments of Labor, Education, Health and Human Services, but also might include Housing and Urban Development, Transportation, and others. The state counterparts of these federal agencies are also included in the list. Perhaps more importantly, SSA needs to develop constructive, mutually trusting relationships with the wide array of organizations that serve people with disabilities: employment service providers, employer organizations, private disability insurers, and others.

The final lesson from state welfare agencies is that, *to achieve cultural change matching the scope and depth of that in the state welfare agencies, we would need a larger and more comprehensive transformation in how we provide economic security to people with disabilities*. The radical nature of changes in family welfare policy essentially forced state welfare agencies and their frontline workers to modify their culture to one that supported their clients' efforts to work. A different course of action would have resulted in substantial harm to their clients, and there is little doubt that failure to adapt quickly did harm many clients.

The policy changes embodied in the Ticket Act are much less radical. In fact, they are reminiscent of the family welfare reforms of the 1970s and 1980s that provided training and employment services, and lessened the disincentives to work faced by welfare parents. These changes, however, did not make work pay for many and did not embody the responsibility to support one's family through work. What is most impressive about the cultural change in state welfare agencies is that it permeated all agency activities, and reached outside the agencies as well. The same result cannot be expected at SSA, because substantial disincentives to work remain, and those who meet medical eligibility criteria are not held accountable for making a good faith effort to work and leave the benefit rolls.

The bulk of SSA's administrative effort for the disability programs continues to be devoted to sending the right check to the right person at the right time; as discussed in the previous section, that process fosters an anti-work culture. As implementation of the Ticket Act proceeds, frontline workers are likely to see that most beneficiaries are not responsive to SSA's return-to-work activities. This is partly because of severe medical conditions, but also because many work barriers and disincentives remain. Many of the workers' daily activities will embody the presumption that people who are not working and who satisfy SSA's medical eligibility criteria cannot work. Under these circumstances, we can hardly expect pro-work cultural change

to permeate the Agency or to reach far beyond its borders. It will be difficult for SSA to engage other entities such as state VR agencies and ENs in its return-to-work efforts if those entities perceive 1) disinterest on the part of most beneficiaries, and 2) continuation of disability determination activities that make beneficiaries and their advocates distrust the Agency's intent.

## **B. Private Disability Insurers**

Private disability insurers appear to be the obvious place to look for lessons about organizational culture that can be applied to SSA, given the challenge SSA faces in providing income support that discourages work while simultaneously promoting return to work. There is no substantial literature on the culture at private disability insurers, and a full study is well beyond the scope of this paper. However, I have learned about private disability insurers through a few interviews conducted for this paper and through formal and informal contacts with private disability insurer executives and industry experts over the years. For example, we conducted an extensive site visit to UNUM/Provident, the nation's largest disability insurer, for an earlier SSA project.<sup>8</sup> The information obtained is enough to suggest that a fuller investigation is warranted. I understand, in fact, that SSA is currently devoting some effort to such an investigation.

Private disability insurers are primarily driven by the profit motive. They succeed by selling their product to major employers and self-employed professionals at a price that is competitive, and at costs that are presumably lower than price but sufficient to effectively deliver the product that their customers want. To be successful they need to 1) treat their employer and insured clients fairly, and with a high level of service; 2) promptly provide income support to claimants who truly cannot work by the criteria specified in their policies; 3) not provide income support to claimants whose claims fail the policy criteria; and 4) help and encourage claimants to return to work as quickly as feasible.

### ***Claims management by private disability insurers***

Several features of claims management operations at private disability insurance companies are strikingly different than those at SSA:

- They use an intensive team approach that involves medical and vocational rehabilitation professionals to manage each case;
- The total resources used in the processing of an individual case appear to be an order of magnitude higher. These include more time and expertise, as well as better systems.
- They do not follow an equivalent of the Program Operations Manual System (POMS) -- a voluminous SSA document containing detailed interpretations of laws, regulations, and rulings, as well as procedural instructions on deciding cases -- but instead rely more heavily on the professional expertise of their staff.
- Teams specialize by impairment.
- The team's responsibility includes helping the individual return to work if feasible.

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<sup>8</sup> See Appendix F.1 of Stapleton and Pugh (2001) for detailed findings from a site visit we conducted to UNUM/Provident, on behalf of SSA.

- Performance management processes are in place to ensure that the claims management teams perform well in all four areas indicated above, including return to work. These include performance measures in all areas; intensive audits of performance on individual claims; senior mentors assigned to each claim team, to assure that the team performs well in all areas on every case; and strong incentives to perform well.

Typically, when a new disability claim enters the private disability insurer's process, the vocational rehabilitation expert on the team assigned to the claim will quickly review the case. He or she will also potentially work with both the claimant and the claimant's employer to develop a rehabilitation plan, explore accommodations, and possibly develop a transitional return-to-work plan – while other members of the team review medical evidence and determine benefit eligibility.

When the insurer awards long-term benefits to the claimant, initially it is typically for a two or three year period and is on the basis of being unable to return to their former occupation. In most instances benefits can be extended, but the claimant must meet a tougher standard to do so. Hence, the claimant has a strong financial incentive to return to work. The message from the insurer to the claimant is: "You've got a few years to get yourself back on your feet, and we'll help you do that. If you have a really rough time, we might continue your benefits for longer, but there is no guarantee." That message is built in to the culture of the claims teams. Thus, like the state welfare agencies, the claims teams take a paternalistic approach. The insurer's approach forcefully stresses that return to work is in the claimant's interest, offers to help the claimant achieve that objective, and provides security by leaving open the possibility of longer-term benefits if return to work is not successful.

In contrast, SSA's claim processing can be reasonably characterized as one that: focuses on accurate, low-cost determination of eligibility, with some consideration for customer service but no concern for return to work; has insufficient resources to perform its limited task well, and is widely regarded as inequitable; is mired in rules, regulations, procedures, and inadequate, outdated systems; has a sequential process, with a different individual responsible for each step (i.e., no team is assigned to the claim or is ultimately responsible for its management); and uses a performance management system that focuses only on productivity and accuracy.<sup>9</sup> The message to claimants is: "prove that you cannot work -- if you can work, we will not help you; if you cannot work, take your benefits and keep them as long as you want."

The contrast between the resources devoted to SSA and private insurer claims processing deserves further discussion. In an earlier study, we estimated that SSA spent about \$1,300 to process the average disability claim in FY1999, including both the initial determination and appeals processes.<sup>10</sup> Based on information provided by one private insurer, it appeared that the latter spent about 75 percent more to manage each claim, although we were not able to verify that this comparison was "apples-to-apples," in part because of the different nature of the processes. What was more impressive was the difference in cost relative to the value of the decision being made. Based on estimates provided by SSA's actuaries, SSA's cost amounted to

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<sup>9</sup> See Stapleton and Pugh (2001), Appendices D and E for an extensive description of SSA's disability determination process.

<sup>10</sup> See Stapleton and Pugh (2001), Appendix G, Section 4.

0.9 percent of mean benefits awarded, included both income and medical (Medicare or Medicaid) benefits. We did not have information on the value of mean benefits for the private insurer, but they are clearly much lower, because a) only a small share of claimants receive benefits for more than three years; b) when benefits are for a longer period, they are often offset dollar for dollar by DI benefits; and c) there are no medical benefits. Private insurers operate in a very competitive environment, where economic efficiency is key to survival. The insurers apparently have determined that it is efficient, from a cost/benefit perspective, to invest much more in claims management relative to benefit values than SSA has. The implication is that SSA spends too little, by a substantial margin.

To be sure, private disability insurers have some other significant advantages relative to SSA in performing their mission. Their claimants have at least some incentive to return to work as benefits are potentially limited in duration; the insurers are much smaller, less complex organizations; they are not in the political spotlight and their customer, the employer, is a well-defined, single entity rather than an array of interest groups with often conflicting objectives; they have connections to their claimants' employers and can use those connections to help claimants return to work; their typical claimant is more educated and skilled than SSA's typical claimant, and almost all have experienced disability onset relatively recently; and development of their eligibility criteria, operational procedures, and management is not subject to intense public scrutiny.

The connection of private disability insurers to employers is worth further discussion, as two aspects of that connection give them advantages that SSA does not enjoy. First, they can become involved with an individual's case immediately upon recognition of disability onset, even while the individual is still at work. In contrast, for SSDI there is a five-month waiting period for benefits, during which the applicant cannot work above SGA. Second, the insurer can negotiate terms of the insurance contract with each individual employer. More employer cooperation with return to work is rewarded by lower premiums.

### ***Lessons from private disability insurers***

Because of fundamental differences between SSA's environment and that of disability insurers, it is doubtful that SSA could ever fully follow the private insurer model. There are, however, features of the private insurer model that demonstrate the possibility of having a pro-work culture while continuing to serve an income support mission -- even if the latter has anti-work features. Most notably, *return to work is imbedded in claims management*, and is not a separate function that comes into play only after the claim is in payment. In that respect, it is quite similar to the new state welfare agency model, where helping families attain employment starts at the front door, continues if they come in the door, and follows them out the back door. In both cases, frontline workers have specialized functions (e.g., return to work, medical determinations, or others), but they work together, with each client, from day one.

The second most notable feature of private disability insurer operations that appears to be transferable is their approach to *performance management*. This is characterized, to varying degrees, by: clarity in mission and an operational statement of that mission, organization-wide attention to the full range of that mission, performance measures that reflect the full range of objectives and that are actively used to improve performance, incentives to innovate, team approaches that take advantage of specialized expertise, and active mentoring by experienced, qualified staff. Such features can all help an organization accomplish its mission. Our assessment

of performance management at SSA found that these aspects were missing or deficient in many respects (Stapleton and Pugh 2001). Improvements in performance management in these areas would make it much easier for SSA to adapt to its changed mission.

Two other lessons reinforce lessons from state welfare agencies. First, *adequate resources are needed* for SSA to perform its new mission successfully. Second, *fundamental changes to address the anti-work nature of the disability programs might be necessary before SSA can successfully move to a pro-work culture* -- changes to introduce the expectation that beneficiaries will attempt return to work, and to create incentives for them to do so.

### **C. The National Aeronautic and Space Administration**

#### ***The importance of consistent, adequate support from outside an agency***

The report of the Columbia Accident Investigation Board was made public as I was completing research for this report. Its focus on NASA's culture caught my attention, although at first blush the different objectives of NASA and SSA seemed to make the findings irrelevant to my own work. Reading further, I noticed the dramatic illustration it provided of the importance of an organization's culture. It became evident that SSA and NASA have one thing in common -- they both operate in a political environment that is sometimes highly charged. The report points a finger at this environment as a major reason that NASA's culture developed the way that it did, and failed to adequately heed warning signs of impending disaster.

“Throughout the [last] decade, the Shuttle Program has had to function within an increasingly constrained budget. Both the Shuttle budget and workforce have been reduced by over 40 percent during the past decade. The White House, Congress, and NASA leadership exerted constant pressure to reduce or at least freeze operating costs. As a result, there was little margin in the budget to deal with unexpected technical problems or make Shuttle improvements.” (CAIB 2003, p. 118)

Thus, just as availability of sufficient resources made it possible for state welfare agencies to succeed in changing their cultures in a desirable direction, lack of sufficient resources pushed NASA's culture in an undesirable direction.

It is difficult to assess the extent to which oft repeated complaints from SSA administrators and others about tightening of administrative budgets and staffing over the last two decades have jeopardized the management of the disability programs, as advances in technology presumably have led to substantial increases in productivity. It is clear from chronic workload backlogs and long processing times, however, that given current administrative processes, resources have been -- and continue to be -- insufficient by a wide margin.<sup>11</sup> Given

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<sup>11</sup> According to the Social Security Advisory Board (2002, p. 6), “disability policy has come to resemble a mosaic, pieced together in response to court decisions and other external pressures, rather than the result of a well thought-out plan of how the programs should be operating. Compounding the problem, the disability administrative structure, now nearly a half-century-old, has been unable to keep pace with the increasing demands that have been imposed upon it. Policy and administrative capacity are dramatically out of alignment in the sense that new and binding rules of adjudication frequently cannot be implemented in a reasonable manner with the resources that are available.” See also Social Security Advisory Board (2001), Stapleton and Pugh (2001), and General Accounting Office (2003) for further discussion of the challenges SSA faces in improving disability determinations and addressing the caseload backlog.

that condition, the failure of Congress and the Administration to appropriate new administrative funds for the initial implementation of the Ticket Act is astonishing. Highly visible, bipartisan support for the Ticket Act was not backed by the resources needed to implement it. This fact and lessons from both state welfare agencies and NASA about the resources needed to develop an appropriate culture, make it hard to be optimistic about early success in changing SSA's culture to one that is pro-work.

### ***The costs of an uncertain external environment***

The CAIB report also provides an example of how the uncertainty of the political environment can adversely affect an Agency's mission.

“In the 1990s, the planned date for replacing the Shuttle shifted from 2006 to 2012 and then to 2015 or later. Given the uncertainty regarding the Shuttle's service life, there has been policy and budgetary ambivalence on investing in the vehicle. Only in the past year has NASA begun to provide the resources needed to sustain extended Shuttle operations. Previously, safety and support upgrades were delayed or deferred, and Shuttle infrastructure was allowed to deteriorate.” (CAIB 2003, p. 118)

There are at least two examples of similar phenomena in the implementation of the Ticket Act. The first is delays in Ticket Act implementation brought on by the lengthy absence of political appointees for SSA leadership, and the uncertainty over what those appointees would eventually want to do. The second is the problems that SSA staff, the Ticket Program Manager, State VR Agencies, and ENs experienced as they first pushed to put everything in place for a quick rollout. They were rewarded by delays in the rollout due to public comments on proposed regulations, and in some instances had to fix systems that were initially built poorly because they were built in haste. For instance, some SSA staff have pointed out that the need to quickly develop a Ticket data system led them to base it on an existing system, which ultimately resulted in significant limitations to the new system. Had they known in advance how much time they actually had before the rollout began, they likely would have started from scratch and developed a better system (see Livermore et al. 2003). There are probably many other such examples. It is important for all parties to remember that the often unpredictable political environment imposes significant costs on the Agency and the organizations it works with.

## **IV. Moving Forward**

Thus far, I have painted a fairly bleak picture of the prospects for successful change toward a pro-work culture at SSA. Against that backdrop, it is encouraging to see some signs that the Agency is moving in the right direction, albeit slowly. I begin this section with a description of some actions the Agency has taken that will contribute to cultural change. I follow that with a description of other such efforts in-progress then discuss a few other steps that appear to merit consideration. I have to conclude, however, that the comprehensive cultural change that many would like to see will not occur until more fundamental changes are made to the disability programs themselves.

### **A. Actions to Date**

***SSA's leaders actively support Agency return-to-work initiative***

One of the early steps the Agency took was to change discussion of its mission to include a substantially more prominent role for return to work. For instance, in SSA's most recent strategic plan (SSA 2003a)<sup>12</sup> the first of four strategic goals is "To deliver high-quality, citizen-centered service." The second of three objectives for this goal is to "Increase employment of people with disabilities." Of the seven key outcomes listed for the goal, four relate specifically to the Agency's return-to-work efforts:

- "Increase by 50 percent from 2001 levels the number of people with disabilities who achieve employment;
- Establish with the DOL [Department of Labor] a nationwide network of employment support staff in One-Stop Centers to serve Social Security beneficiaries with disabilities;
- Test the impact of early intervention and youth transition; and
- Eliminate backlogs for post-entitlement work"<sup>13</sup>

Return to work also appeared prominently in past high-level documents on the Agency's mission<sup>14</sup>, but discussions of specific objectives have become more focused on the specifics of implementation – items that are likely to drive managerial decisions and the actions of frontline workers in a positive way. The Commissioner's statement in support of the President's budget request for SSA prominently mentions funding for Ticket-to-Work implementation for every budget year from FY2000 to FY2003. Somewhat surprisingly, there is no mention of the program or other return-to-work efforts in the Commissioner's FY2004 statement, but the statement features a large increase in support to reduce disability determination backlogs, including the post-entitlement backlog.<sup>15</sup>

SSA has also taken substantial steps to train Field Office and other staff, and one Field Office worker we've interviewed indicated that the magnitude of the training effort – including 40 Interactive Video Training programs on work incentives – made it clear that the central office was giving a high priority to return to work. He stated that in 20 years with SSA, he had never before seen as much training and emphasis on work incentive issues. Thus, the message that return to work is an important priority for SSA is at least becoming evident to frontline workers.

***SSA is addressing long-dormant process issues related to return to work***

Early on in our TTW evaluation efforts, one manager at SSA told us that the implementation of TTW has served as a catalyst to address return-to-work issues that have "lain dormant within SSA for decades." For instance, prior to TTW, SSA did not have a good system to document work activity for SSDI beneficiaries and determine when earnings were sufficient to stop benefits. This often resulted in overpayments and eventual large requests for re-payments –

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<sup>13</sup> The last of these goals is not explicitly focused on return-to-work and has a broader purpose. The Agency clearly has recognized, however, that backlogs in processing post-entitlement work, and resulting overpayments, are an impediment to greater success in its return-to-work efforts.

<sup>14</sup> For example, SSA (1999) prominently features a discussion of SSA's efforts to support the legislation that eventually became the Ticket Act.

<sup>15</sup> All of these statements appear at <http://www.ssa.gov/budget>. Accessed 9/14/2003.

a potentially devastating request for a beneficiary who has just successfully returned to work. SSA regional and field office staff developed a computer program called Modernized Return to Work (MRTW) for the purpose of tracking work activity and earnings, and the Agency has now implemented this software nationwide. Similarly, SSA's Disability Control File (DCF), released in November 2002, helps SSA keep track of work activity for both SSDI and SSI beneficiaries, and makes that activity more transparent to all.

***SSA is engaging other agencies and organizations that can help in its new mission***

SSA has also adopted a more outward, constructive orientation toward entities that can play a positive role in helping SSA accomplish its new mission. Most obviously, these include the Program Manager (MAXIMUS), the Benefit Planning Assistance and Outreach (BPAO) grantees and the Protection and Advocacy for Beneficiaries of Social Security (PABSS) grantees.

SSA has also engaged the leadership of other federal agencies that play significant rolls in supporting people with disabilities, most visibly DOL and the Center for Medicare and Medicaid Services (CMS). DOL is establishing a Disability Program Navigator position in state One-Stop employment centers, to provide information to SSDI and SSI beneficiaries who use those centers. SSA also worked with DOL to establish the "Ticket to Hire" database, an effort aimed at facilitating employer hiring of beneficiaries who have assigned their Tickets. CMS is implementing the Medicaid and Medicare provisions of the Ticket Act, collaborating with SSA as needed. Among other things, the two agencies are pursuing development of demonstrations that would provide early access to health insurance for DI beneficiaries and address the health care needs of beneficiaries with affective disorders. SSA is also working with DOL and the Department of Education to conduct seven Youth Transition Demonstration Projects aimed at improving employment outcomes for SSI youth as they transition to adulthood.

In addition, SSA has conducted extensive outreach efforts to state VR agencies and providers, most visibly through activities arranged by the Program Manager. SSA has also tried to be responsive to issues these organizations have raised, although this is often difficult for SSA to do. An example is Vocational Rehabilitation Providers' Handbook Transmittal No. 17, which described SSA's regulations for paying state VR agencies under TTW. It also clarified issues concerning Ticket assignments by beneficiaries who were former state VR agency clients, or who later became VR clients.

**B. Actions in Progress**

Many other current activities are likely to eventually contribute to a more pro-work culture at SSA.

***SSA continues to address system issues***

Although progress has been made in developing tools for Agency staff to use in conducting return-to-work activities, much remains to be done. The lack of automation and coordination of functions between the SSI and SSDI programs makes the processing of earnings information difficult and time consuming for CRs. Incomplete systems integration has been identified as a significant issue. Under an initiative referred to as eWork, SSA is integrating the DCF with both the MRTW and software used for processing CDRs (PC-CDR), and plans to implement the new system later this year.



***SSA is pursuing outreach to beneficiaries on return-to-work issues***

SSA has not substantially marketed TTW directly to beneficiaries in the past. There is, however, an effort underway to do that, including a plan to procure substantial professional services for this purpose. Such efforts have the potential to change the relationship that SSA has with its beneficiaries in a positive way.

***SSA is implementing a system to provide some return-to-work services directly to beneficiaries***

As indicated earlier, SSA elected not to implement the ESR position nationwide because of financial considerations. The Agency is, however, moving forward with establishment of the AWIC positions and the development of WILs in the Field Offices.

***SSA is studying the operations of private disability insurers***

As indicated earlier, SSA leaders are quite interested in learning from private disability insurers, and are engaged in an effort to do that.

***SSA is attentive to provider concerns***

SSA continues to be attentive to the concerns raised by ENs and state VR agencies. For example, SSA has just instituted the Certification Payment Request Process -- a simplification to the Ticket payment system designed to make provider documentation of earnings less onerous and speed up the payment process. SSA has also launched the EN Capitalization Project, to be conducted by the Program Manager, for the purpose of helping ENs find ways to finance the provision of Ticket services before successful employment outcomes lead to substantial Ticket revenues.

***SSA is pursuing other employment initiatives from the Ticket Act***

The Agency is actively pursuing plans to conduct numerous demonstrations, all of which will promote return to work: the Sliding Scale Benefit Offset (i.e., \$1 for \$2) Demonstration, the Early Intervention Experiment, a mental health demonstration, and the Youth Transition Demonstrations.

To be sure, for the most part the activities described above have been implemented at a pace that is far slower than many advocates and others would like. From my perspective, however, that slowness has been due to the many significant challenges the Agency faces in moving forward, rather than a lack of commitment on the part of Agency leaders.

**C. Actions for the Future**

Looking ahead, there are a number of actions the Agency could take that would promote cultural change to help SSA shed its image as “Trust Fund police,” which is at least a partially fair description of its past culture; and to assume a new role of “benevolent paternalism,” with a strong emphasis on return to work.

***SSA’s efforts to implement a more advanced performance management could have a substantial impact on disability program culture***

In earlier work, we developed options for the Agency to consider that would improve its outdated performance management system (Stapleton and Pugh 2001). Among the options were opportunities for development of performance measures that would reflect the full scope of the Agency’s mission, and use of those measures to actively reward performance and manage the

organization. In that context, development, implementation and active use of measures based on return-to-work activities would substantially help SSA move toward a pro-work culture. It would not only affect the daily decisions of workers, but also help SSA recruit and retain capable workers. In this regard, it is encouraging to see that SSA's most recent strategic plan includes implementation of a new performance management system as a key outcome under the strategic goal: "to strategically manage and align staff to support SSA's mission," with specific goals of developing systems that recognize and reward superior performance at all levels, by 2005 (SSA 2003a, p. 36).

***Development of a strong pro-work culture is likely to require integration of some return-to-work functions into SSA office***

Rapid, full implementation of the Ticket virtually required that SSA contract much of the implementation work to another organization, the Program Manager. Such an organization can focus its resources absolutely on the task at hand, quickly develop the concentration of expertise needed to operate the program, and avoid many of the bureaucratic issues that make it difficult for an organization like SSA to move quickly. Similarly, SSA's use of the BPAO grantees to quickly provide beneficiaries with better return-to-work information was probably essential to a successful launch, in part because of beneficiary distrust. The result, however, is that frontline workers are rarely involved in the provision of return-to-work services. Integration of more return-to-work functions into Field Offices could help change the culture of the field offices. Right now, the return-to-work Field Office functions are so limited that SSA cannot justify including a work specialist in each office. Transfer of additional functions would presumably mean transfer of additional resources to perform those functions, and would make return-to-work activities a more integral part of what Field Offices do.

Several interviewees have expressed serious doubts about the ability of SSA to implement some of the activities that are currently outsourced to the Ticket Program Manager and the BPAOs. One reason for doubt is the enormous pressure that disability determination backlogs place on managers to focus new resources on the determination process. Another is beneficiary distrust of the Agency. The latter is a chicken and egg problem; distrust is likely to continue as long as Field Office staff and other SSA/DDS employees focus almost exclusively on disability determinations.

The current separation of return-to-work functions from disability determination functions serves to perpetuate SSA's pre-Ticket culture. In the long-term, it will be necessary for SSA to integrate these functions into its daily work, following the models of the private disability insurers and the state welfare agencies, if the Agency is to develop a pro-work culture. This does not mean that the Agency should enter the business of providing employment services directly to beneficiaries. It does mean, however, that Field Office staff should actively engage beneficiaries in discussions about return to work and, to the extent feasible and appropriate, steer them in that direction in a supportive manner.

***Specific training of SSA staff on disability awareness might be warranted***

SSA's training efforts on return-to-work issues are substantial, and obviously have made an impression on managers and frontline staff. One observer of the training, however, suggested adding training in "disability awareness;" that is, to help frontline workers better understand the perspective of the beneficiary, so that the workers can serve them better.

### *SSA needs to continue attending to provider issues*

SSA's current efforts to address payment issues and help ENs identify and pursue capitalization opportunities could be of substantial benefit to providers. The Ticket payment process remains complex, however, in part because of different earnings report requirements for the SSI and SSDI programs. Additional effort to address payment issues seems warranted. Within the bounds of the current payment structure, there might be other ways to substantially simplify the process. More generally, SSA needs to continue to be responsive to provider concerns about the financial viability of the program from the provider perspective. It will be difficult to do so in a way that also makes the program financially viable from SSA's perspective, but at least conceptually there seem reasonable prospects for developing a system that both pays for itself through benefit reductions and is financially attractive to providers. SSA needs to continue to treat the providers as valued partners in their return-to-work efforts, even as it continues to hold them accountable.

### *Additional resources ear-marked to return-to-work efforts would be extremely valuable*

Although it is encouraging to see SSA and OMB requesting additional funds to address post-entitlement backlogs and other workloads, it seems that a reasonable case can be made for even more monetary support, targeted at return to work. Areas identified by interviewees as needing additional resources include post-entitlement workloads (beyond the current request); systems development; and outreach and marketing to beneficiaries, employers, and others. One interviewee suggested declaration of a partial amnesty for beneficiaries who have received overpayments because of delays in processing post-entitlement work. This would serve as both a good will gesture from SSA toward beneficiaries who want to work, and a way to clean up backlogs that are problematic for SSA's return-to-work efforts.<sup>16</sup> It is not possible to judge the value of these suggestions without more information and careful analysis. However, it seems clear that a) more resources are needed, and b) a significant, visible boost to SSA's return-to-work objectives would help the Agency move toward a pro-work culture, and help beneficiaries and others understand that the Agency is making a good faith effort to support beneficiary return to work. Unfortunately, in the current financial and political climate, it would be very hard for the Agency to ask for such support unless it can also convincingly demonstrate that the support will pay for itself through benefit deductions. For instance, it might be possible to make a case for the proposition that a carefully structured amnesty and clean-up of post-entitlement backlogs would pay for itself in the long-term through reduced overpayments and increased return to work.

#### **D. Future Policy Change**

Although SSA is taking steps to move toward a pro-work culture, and can potentially take others, such steps cannot lead to the development of a culture that is as pro-work as many would like to see. As suggested by the experience of welfare reform, and the differences between

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<sup>16</sup> It is my understanding that SSA already in effect offers a partial amnesty for those beneficiaries who have assigned their Tickets, but are later discovered to be ineligible for benefits and the Ticket because of past work. In such cases, the beneficiary is allowed to continue use of his or her Ticket, and payments are made to the provider per the usual payment schedule.

the SSA disability programs and private disability insurance, more substantial changes in income support policy for people with disabilities will almost certainly be necessary before there can be a radical change in the Agency's culture. Such changes would need to substantially address the anti-work nature of current income support policy.

The changes would need to include improvements that would make work pay for many more beneficiaries. Welfare reform made work pay for parents by a) offering "carrots" -- the increase in the EITC, improved access to health insurance, child care services, and other supports for low-income working families -- and b) applying "sticks" (time limits and work requirements). Designing the carrots and sticks for people with disabilities is an enormous challenge, in part because there are many people with disabilities for whom we would not want to apply a stick of any sort, and in part because heavy reliance on carrots is very expensive.<sup>17</sup> Were policy changes for people with disabilities to occur of the same magnitude as those that occurred for low-income families, the Agency would be in a position to -- indeed, would be almost forced to -- develop a strong pro-work culture and improve the return-to-work services it offers to people with disabilities. Until that happens, the best efforts the Agency can possibly make to change its culture will likely fall far short of what many outside of the Agency would like it to achieve.

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<sup>17</sup> See Burkhauser and Stapleton (2003 and forthcoming) for further discussion of the need for such policy changes.

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