



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

Congressional Response Report

Milwaukee Social Security
Administration Field Office Closure

A-05-18-50671 | July 2018

OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

July 23, 2018

The Honorable Gwen Moore
Member, United States House
of Representatives
316 North Milwaukee Street, Suite 406
Milwaukee, WI 53202

Dear Ms. Moore:

In a March 5, 2018 letter, you asked that we review the Social Security Administration's (SSA) decision to close the Mitchell Street field office in Milwaukee, Wisconsin. For our review, we provide information on SSA's (1) reasons for the field office closure, (2) plans to mitigate any effects on individuals served by the field office, and (3) adherence to its internal policies related to congressional and public notification of the office closure.

My office is committed to combating fraud, waste, and abuse in SSA's operations and programs. Thank you for bringing your concerns to my attention. The report highlights facts pertaining to the issues raised in your letter. To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

If you have any questions concerning this matter, please call me or have your staff contact Walter Bayer, Congressional and Intragovernmental Liaison, at (202) 358-6319.

Sincerely,



Gale Stallworth Stone
Acting Inspector General

Enclosure

cc:
Commissioner of Social Security

Milwaukee Social Security Administration Field Office Closure

A-05-18-50671



July 2018

Office of Audit Report Summary

Objective

To answer questions from Representative Gwen Moore regarding the March 22, 2018 closing of the Mitchell Street Social Security Administration (SSA) field office in Milwaukee, Wisconsin. For our review, we provide information on SSA's (1) reasons for the field office closure, (2) plans to mitigate any effects on individuals served by the field office, and (3) adherence to its internal policies related to congressional and public notification of the office closure.

Background

SSA policy requires that SSA notify Congress and other stakeholders about significant service delivery changes, such as a field office closing after the Deputy Commissioner of Operations approves the closure. The policy states that the SSA regional office should hold discussions about any significant service delivery changes with affected Senators and Representatives as well as their respective staff members. The policy also instructs SSA to hold discussions with all other parties who may have a stake in the proposed changes, such as community leaders.

Conclusions

In October 2015, SSA decided to relocate the Mitchell Street field office based on ongoing safety concerns and unresolved building maintenance issues. Accordingly, in December 2015, the General Services Administration (GSA) started a lease-relocation project to search for a new SSA field office site in the area the Mitchell Street field office served. However, in January 2017, GSA notified SSA it could not secure a viable location that would meet space requirements. In January 2018, the Regional Commissioner decided to close the Mitchell Street field office and consolidate its employees in the other Milwaukee-area field offices.

SSA stated the four other Milwaukee-area field offices near the closed Mitchell Street field office would help mitigate any negative effects of the closure. These other field offices had bilingual staff and interpreter services to assist the Spanish-speaking clients formerly served by the Mitchell Street field office.

SSA policy requires that the SSA Regional Office notify congressional and other stakeholders of field office closures. The policy does not contain specific timeframes for the notifications. However, SSA does provide guidance to its regional offices on the suggested timeframes for these notifications. The SSA guidance states that notifications must be made at least 90 days before the date of the consolidation except in extenuating circumstances. According to SSA, the significant nature of the health and safety incidents in the Mitchell Street field office, in addition to GSA's inability to secure alternative space, were the extenuating circumstances that expedited the decision to consolidate the office. As such, SSA first notified the affected congressional officials of the Mitchell Street field office closure on January 9 and 10, 2018—about 70 days before the closure. SSA also notified 40 stakeholders, such as local community leaders, between January 10 and March 13, 2018—between 9 and 71 days before the closure.

In response to our draft report, SSA stated it is reviewing the field office consolidation policy and regional business processes to ensure consistency and identify areas for improvement. Additionally, in the future, if GSA needs to expand its search area for a given relocation, SSA stated it will inform the local congressional delegation when it encounters difficulties finding space for office relocation.

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ABBREVIATIONS

AIMS	Administrative Instructions Manual System
FY	Fiscal Year
GAM	General Administration Manual
GSA	General Services Administration
OIG	Office of the Inspector General
Pub. L. No.	Public Law Number
SSA	Social Security Administration

OBJECTIVE

Our objective was to answer questions from Representative Gwen Moore's March 5, 2018 letter regarding the March 22, 2018 closing of the Mitchell Street Social Security Administration (SSA) field office in Milwaukee, Wisconsin. In addressing the issues raised by the Congresswoman, we reviewed SSA's (1) reasons for the field office closure, (2) plans to mitigate any effects on individuals currently served by the field office, and (3) adherence to its internal policies related to congressional and public notification of the office closure.

BACKGROUND

SSA's Administrative Instructions Manual System outlines its policy for assessing field offices for consolidation or closure.¹ The policy requires that SSA notify congressional and other stakeholders about any significant service delivery change, such as a field office closing, after the Deputy Commissioner of Operations approves the closure. The policy states that the SSA Regional Office should hold discussions about any significant service delivery changes with affected Senators and Representatives and their respective staff members. The policy also instructs SSA to hold discussions with all other parties who may have a stake in the proposed changes, such as community leaders.

RESULTS OF REVIEW

In October 2015, SSA decided to relocate the Mitchell Street field office based on ongoing safety concerns and unresolved building maintenance issues. Accordingly, in December 2015, the General Services Administration (GSA)² started a lease-relocation project to search for a new SSA field office site in the area the Mitchell Street field office served.³ However, in January 2017, GSA notified SSA it had exhausted all efforts to identify a viable location that met SSA requirements. In January 2018, the Regional Commissioner decided to close the Mitchell Street field office and consolidate its employees in the other Milwaukee-area field offices.

According to SSA, the four other Milwaukee-area field offices near the closed Mitchell Street field office would help mitigate any negative effects of the closure. SSA also stated the other field offices were equipped with bilingual staff and interpreter services to assist Spanish speaking clients formerly served by the Mitchell Street field office.

¹ SSA, *AIMS, General Administration Manual (GAM)*, ch. 12.05, sec. 12.05.11 (January 12, 2017).

² GSA helps Federal agencies build and acquire office space.

³ SSA defines relocation as a facility move within the existing service area. SSA, *AIMS, GAM*, ch. 12.05, sec. 12.05.04 (January 12, 2017).

SSA policy requires that the Regional Commissioner notify congressional and other stakeholders about field office closures. The policy does not contain specific timeframes for these notifications.⁴ However, SSA does provide guidance to its regional offices on the suggested timeframes for these notifications. The SSA guidance states that notifications (congressional, union, staff, and local stakeholders) must be made at least 90 days before the date of the consolidation except in extenuating circumstances. According to SSA, the significant nature of the health and safety incidents in the Mitchell Street field office, in addition to GSA's inability to secure alternative space, were the extenuating circumstances that expedited the decision to consolidate the office. As such, SSA first notified the affected congressional officials of the field office closure on January 9 and 10, 2018—about 70 days before the closure. SSA also notified various stakeholders, such as local community leaders, between January 10 and March 13, 2018—between 9 and 71 days before the closure.

Reasons for the Field Office Closure

According to SSA, it requested GSA obtain new space for the Mitchell Street field office because of ongoing safety concerns and unresolved building maintenance issues. SSA stated that assault and property crime activity occurred in the area of the field office. Additionally, elevator breakdowns limited accessibility and forced visitors to use a restricted stairwell to access the field office. However, GSA could not identify a viable location that met SSA requirements. As a result, the Regional Commissioner decided to close the office in light of ongoing safety concerns for employees and the public and unresolved building maintenance issues.

Safety Concerns for Employees and the Public

SSA stated that assault and property crime activity in the area of the Mitchell Street field office occurred during day and evening hours. According to SSA, three police activities caused the field office to lock down, with the most recent occurrence on October 23, 2017. In addition, SSA cited ongoing safety concerns related to adjacent and in-building tenants, such as a stabbing and armed robbery. Field office employees also shared their safety concerns with the Regional Commissioner with one employee asking if someone had to be harmed before the office was relocated to a safer area.

⁴ Representative Moore's letter stated that, according to SSA policies and procedures for closing and consolidating field offices, "At least 180 days prior to the *proposed consolidation* date, we will notify the public about any field office consolidation proposal and include a 30 day comment period" (see Appendix A). This notification requirement was included only in the Fiscal Year (FY) 2015 explanatory statement, 151 Cong. Rec. H9842 (December 11, 2014) associated with the *Consolidated and Further Continuing Appropriations Act of 2015*, Pub. L. No. 113-235, 128 Stat. 2130, p. 2511. The notification requirement was not included in the FY 2016 through 2018 appropriation acts or associated explanatory statements. As a result, SSA stated it was not required to follow the 180-day notification requirement for the Mitchell Street field office closure.

Unresolved Building Maintenance Issues

The public entrance had only one elevator for use by SSA visitors and another lessee. According to SSA, the elevator frequently broke down. SSA recorded 43 elevator breakdowns between January 2014 and October 2017. During these times, SSA employees escorted mobile visitors up a restricted stairwell into the field office's second-floor location. However, physically disabled customers were unable to enter the office during elevator down times and had to return to the office at a different time. SSA stated it and GSA worked with the lessor to resolve the elevator issues, but they were never permanently resolved.

Lack of Viable Space for Relocation

In October 2015, SSA decided to relocate the Mitchell Street field office based on ongoing safety concerns and unresolved building maintenance issues. Accordingly, in December 2015, GSA started a lease-relocation project to search for a new SSA field office site in the area the Mitchell Street field office served. GSA identified six potential locations, but only one met SSA requirements.⁵ However, the property owner decided to lease the space to a retail store instead of SSA. GSA also contacted Milwaukee city officials three times—once in February 2016 and twice in December 2016—for assistance in finding potential locations for the field office. According to GSA, the city officials indicated there was no space in the desired location that would meet SSA requirements. In January 2017, GSA notified SSA it had exhausted all efforts to identify a viable location that met SSA requirements. In January 2018, the Regional Commissioner decided to close the Mitchell Street field office and consolidate its employees in the other Milwaukee-area field offices.⁶

⁵ According to GSA, these locations had limited accessibility, did not meet fire/life safety regulations, were outside the delineated area, or did not meet SSA space needs. In one case, the owner of a mixed use building was not interested in leasing space to a public facing office.

⁶ On January 24, 2018, Representative Gwen Moore notified GSA of potential field office space at the new public library at 906 W. Historic Mitchell Street. On February 27, 2018, Senator Tammy Baldwin notified GSA of potential field office space at the vacated former public library at 1432 W. Forest Avenue. GSA informed us that it did not determine the viability of either of these spaces for the Mitchell Street field office relocation because there was no longer a space need after SSA notified GSA that it was consolidating the office with other Milwaukee-area field offices.

Plans to Mitigate Any Effects on Individuals Served by the Field Office

According to SSA, the four other Milwaukee-area field offices near the closed Mitchell Street field office will help mitigate any negative effects of the closure. According to SSA, these offices are located within 3 to 8 miles of the closed Mitchell Street field office, and public transportation is readily available to all locations.⁷ Further, SSA stated there are bilingual staff and interpreter services at all four of the other Milwaukee-area field offices to assist the large number of Spanish-speaking clients formerly served by the Mitchell Street field office. Additionally, SSA stated it added three self-service computer stations in the local community to offer public access to SSA's online services.

Adherence to Internal Policies Related to Congressional and Public Notification of the Office Closure

SSA policy requires that the Agency notify congressional and other stakeholders about a field office closure after the Deputy Commissioner of Operations approves the closure.⁸ Specifically, SSA policy states the SSA Regional Office should hold discussions about any significant service delivery changes with affected Senators and Representatives and their respective staff members. SSA policy also requires written notification regarding the field office change and telephone contact with the congressional member or his/her staff. Furthermore, according to policy, SSA should hold discussions with all other parties who may have a stake in the proposed changes, such as community leaders. SSA policy does not contain specific timeframes for congressional or public notification. However, SSA does provide guidance to its regional offices on the suggested timeframes for these notifications.⁹ SSA guidance states that notifications (congressional, union, staff, and local stakeholders) must be made at least 90 days before the date of the consolidation except in extenuating circumstances. SSA indicated the exception allows for certain circumstances that require greater flexibility and caution, such as those involving critical health, safety, space, and renovation issues.

According to SSA, the significant nature of the health and safety incidents in the Mitchell Street field office, in addition to GSA's inability to secure alternative space, were the extenuating circumstances that expedited the decision to consolidate the office. As such, SSA first informed the affected congressional officials of the Mitchell Street field office closure on January 9 and 10, 2018—about 70 days before the closure. SSA also notified various stakeholders, such as local community leaders, between January 10 and March 13, 2018—which was between 9 and

⁷ We confirmed that public transportation from the Mitchell Street field office to the other Milwaukee-area field offices is available by using information from the local transit system website. We also confirmed other Milwaukee-area field offices are approximately 3 to 8 miles from the Mitchell Street field office.

⁸ SSA, *AIMS, GAM*, ch. 12.05, sec. 12.05.11 (January 12, 2017).

⁹ SSA, *Operations Service Delivery Change Request Business Process*, pp. 1-2.

71 days before the closure. According to SSA, it contacted 40 individuals and organizations to notify them of the office closure.

CONCLUSIONS

SSA cited ongoing safety concerns and unresolved building maintenance issues in its decision to obtain new space for the Mitchell Street field office. However, following an extensive search, GSA was unable to secure space in the area served by the Mitchell Street field office that met SSA requirements. Accordingly, the Regional Commissioner subsequently decided to close the Mitchell Street field office and consolidate its employees in the other Milwaukee-area field offices. The existence of four other Milwaukee-area field offices near the closed Mitchell Street field office will help mitigate negative effects of the closure. Other Milwaukee-area field offices were equipped with bilingual staff and interpreter services to assist the large number of Spanish-speaking clients formerly served by the Mitchell Street field office. Additionally, SSA added three self-service computer stations in the local community to offer public access to SSA's online services.

In response to our draft report, SSA stated it is reviewing the field office consolidation policy and regional business processes to ensure consistency and identify areas for improvement. Additionally, in the future, if GSA needs to expand its search area for a given relocation, SSA stated it will inform the local congressional delegation when it encounters difficulties finding space for office relocation.¹⁰



Rona Lawson
Assistant Inspector General for Audit

¹⁰ See Appendix C.

APPENDICES

Appendix A – CONGRESSIONAL REQUEST LETTER

GWEN MOORE
4TH DISTRICT, WISCONSIN

COMMITTEE ON
FINANCIAL SERVICES
HOUSING AND INSURANCE
MONETARY POLICY AND TRADE, RANKING MEMBER

COMMITTEE ON BUDGET
DEMOCRATIC STEERING AND
POLICY COMMITTEE



Congress of the United States House of Representatives

March 5, 2018

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Ms. Gale Stallworth Stone
Acting Inspector General
Social Security Administration
6401 Security Boulevard, 2-MF-5
Baltimore, MD 21235

Dear Acting Inspector General Stallworth Stone,

I am writing regarding the anticipated closing of the “Mitchell St.” Social Security Administration (SSA) Field Office at 1710 S. 7th St. Ste. 200, Milwaukee, WI 53204.

My office was first notified that the Mitchell St. Field Office would be closing on January 9, 2018. It was explained to my staff that the current office location had numerous health and safety concerns which necessitated closing the office. I have been reassured that funding is not the dominant reason for closing this office and that the SSA remains committed to serving the predominantly Hispanic population on the near Southside of Milwaukee.

As noted in SSA policies and procedures for closing and consolidating field offices, “At least 180 days prior to the *proposed consolidation* date, we will notify the public about any field office consolidation proposal and include a 30 day comment period.” As stated above my office was first notified on January 9, 2018, less than two months prior to the *anticipated consolidation*. Based on information received from SSA and the General Services Administration (GSA), SSA began the process of looking for an alternative site in late 2015; over two years ago. Per the above requirements, SSA had both the ability and the opportunity to notify my office and the public at large of its anticipated actions. Instead, it chose to bypass its own procedures by providing my constituents and me with less than 60 days’ notice of a completed decision. According to SSA and GSA, at the Mitchell St. Office, the SSA had the option to lease its existing space through 2022. However, SSA has already exercised its option to terminate the lease with 120 days notice. These actions violate the intent of Congress by ignoring the mandate to allow for public comment and to provide notice prior to a final decision.

Additionally, as noted in SSA office closing and consolidation procedures, “There are times when we have to close an office for health and safety reasons, renovations or space issues, E.g. natural disaster, building fire, eviction based on bankruptcy of building owner, etc. SSA will not obtain public input for those situations.” Alderman Perez and

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City of Milwaukee Mayor Tom Barrett have reviewed data both on local crime as well as complaints about the building. None of the data reviewed by the City of Milwaukee points to problems that impact health and safety to an extent that would allow SSA to bypass the intent of Congress to provide notice and opportunity for public input. Every other SSA office location in The City of Milwaukee had more police calls than the Mitchell Street Field Office. The City of Milwaukee has no record of the extensive list of accessibility complaints referenced by SSA. The City of Milwaukee routinely works with private building owners to correct these types of deficiencies, my office can attest to their effectiveness in this regard. Further, all the examples listed as cause for exemption point to serious events which negated the continued viability of the space for the intended purpose of the SSA. The health and safety concerns as discussed by SSA do not rise to a level sufficient to bypass Congressional intent.

The Hispanic community on Milwaukee's Southside is one of the fastest growing and most economically challenged communities in Milwaukee. This closure not only leaves the Southside without a SSA office, but also disenfranchises the largest Hispanic Community in the State of Wisconsin.

It is clear to me that the process as prescribed by SSA's own requirements was subverted and Congressional intent was ignored. I am requesting an investigation by the Office of Inspector General to determine if/what missteps were made by SSA during this process. If missteps were made, I am inquiring what steps should be taken both to mitigate the opportunity for future error and to mitigate any effects on Wisconsin's largest Hispanic community, the near Southside of Milwaukee and the Southshore Suburbs. I am also requesting that while OIG investigates these concerns, the SSA cease any and all efforts to complete the anticipated consolidation of the Mitchell St. Office. I look forward to working together to ensure that SSA is fully committed to serving the constituents of Wisconsin's 4th Congressional District.

Sincerely,



Gwen Moore
Member of Congress

GM/DH

Appendix B – SCOPE AND METHODOLOGY

To achieve our objective, we:

- Reviewed applicable sections of the Social Security Administration’s (SSA) Administrative Instructions Manual System.
- Reviewed applicable sections of the following appropriation acts and applicable sections of associated explanatory statements:
 - *Consolidated Appropriations Act of 2014*, Pub. L. No. 113-76, 128 Stat. 5, p. 406;
 - *Consolidated and Further Continuing Appropriations Act of 2015*, Pub. L. No. 113-235, 128 Stat. 2130, p. 2511;
 - *Consolidated Appropriations Act of 2016*, Pub. L. No. 114-113, 129 Stat. 2242, p. 2645;
 - *Consolidated Appropriations Act of 2017*, Pub. L. No. 115-31, 131 Stat. 135, p. 559; and
 - *Consolidated Appropriations Act of 2018*, Pub. L. No. 115-141, 132 Stat. 348.
- Interviewed management officials from the Chicago SSA Regional Commissioner’s Office to learn the details about the closure of the Mitchell Street field office in Milwaukee, Wisconsin.
- Reviewed information obtained from the Chicago SSA Regional Commissioner’s Office.
- Reviewed information obtained from Representative Gwen Moore’s Office.
- Interviewed General Services Administration officials regarding the closure of the Mitchell Street field office.
- Reviewed information obtained from the General Services Administration officials.

We conducted our review between March and June 2018 in Chicago, Illinois. The principal entity reviewed was SSA’s Chicago Regional Commissioner’s Office. We conducted this audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: July 16, 2018 Refer To: SIJ-3

To: Rona Lawson
Assistant Inspector General for Audit

Stephanie Hall

From: Stephanie Hall
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Congressional Response Report, "Milwaukee Social Security Administration Field Office Closure" (A-05-18-50671) -- INFORMATION

Thank you for the opportunity to review the draft report. As indicated in the report, the decision to close the Mitchell Street field office was made based on safety concerns for our employees and the public, and in accordance with our internal policies. We are currently reviewing our field office consolidation policy and regional business processes to ensure consistency and to identify areas for improvement. Additionally, in the future, if the General Services Administration needs to expand its search area for a given relocation, we will inform the local congressional delegation that we are encountering difficulties finding space for office relocation.

Please let me know if we can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.

MISSION

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