

## **DDS Commission Report – November 2022**

Disability Determination Services staff make the medical / vocational determination of eligibility for those applying for Social Security Disability. The DDS has two components – the main DDS component processes a caseload of applicants from the State of Oklahoma while the Extended Service Team (EST) processes a caseload made up of applicants from other states as determined by SSA. In Federal Fiscal Year 2022, the two components together processed cases from Oklahoma, Kansas, New Mexico, Louisiana, and Georgia.

SSA sets benchmark targets for the DDS in Production, Processing Time, and Quality. These benchmarks are applied across three major groups of cases:

- Initial Cases (IN) – claimants making their first or a new application for benefits
- Reconsideration (RC) – claimants appealing an unfavorable initial determination
- Continuing Disability Reviews (CDR) – periodic review of claimants currently drawing disability benefits

### **FY 2022 Production**

At the outset of FY22, the DDS was still realizing impact to production caused by three main factors:

1. During the height of the COVID pandemic, SSA restricted some critical workloads. Most impactful was suspension of the DDS authority to require the claimant attend consultative examinations (CE). On average, between 30% and 40% of all cases require a CE. While this workload had resumed by early FY22, a significant number of our CE providers were forced out of business during the months' long shutdown and have since found other sources of revenue. Currently, the DDS remains approximately 30% below our pre-pandemic level of available CE providers leading to serious delays in processing cases requiring a CE by SSA policy.
2. The transition to SSA's case processing system, DCPS required multiple case assignment limitations or stoppages as our staff worked down caseloads in our legacy system and slowly learned and adapted to DCPS.
3. The DDS onboarded an unprecedented number of Disability Examiners in late FY 2020 and in FY 2021. These classes drew several of our most experienced and productive Examiners out of production to serve as mentors from September 2020 through June 2022.

Considering these factors, we worked closely with the SSA Dallas Regional Office as the year progressed to adjust individual case level targets as needed.

FY22 Production Breakout									
	Initial Cases			Reconsideration Cases			Continuing Disability Reviews		
	Target	Clearances	% Difference	Target	Clearances	% Difference	Target	Clearances	% Difference
DDS	32500	30999	-4.62%	7998	10022	25.31%	11413	10921	-4.31%
EST	1380	1373	-0.51%	2	2	0.00%	4761	5332	11.99%
Total	33880	32372	-4.45%	8000	10024	25.30%	16174	16253	0.49%

While DDS produced just under target for some specific case types, we significantly exceeded production targets in others. SSA provides each state with individualized production targets but at the end of the year, they look at the combined targets for all states within the region as their benchmark for reporting production to SSA. The Oklahoma DDS and EST production contributed to the Dallas Region meeting or exceeding all their FY22 production targets. Overall, the DDS and EST combined production was 1.02% - or 595 cases over our combined case level targets.

FY22 Production Summary			
DDS & EST Combined Total	SSA Target	Total Clearances	% Difference
	58054	58649	1.02%

## FY 2022 Processing Time

The DDS significantly exceeded FY22 processing time targets for both SSA case types that are measured, Initial and Reconsideration. Due to significant delays in processing cases from states needing assistance, SSA excludes EST from a processing time standard.

FY22 Processing Time		
Target	IN <185 Days	RC <187 Days
DDS	151.7	119.8
Region	207.1	207.5
Nation	184.2	181.5
Difference Target	-33.3	-67.2
Difference Region	-55.4	-87.7
Difference Nation	-32.5	-61.7

DDS was 33.3 days below SSA target for IN processing time and 67.2 days below for RC. This is very significant during a time when processing time generally increased overall for most DDS across the nation.

## **FY 2022 Quality**

Final FY22 quality metrics are provided by SSA at the end of the first quarter of FY23. However, for the end of the final rolling quarter of FY22 (July – September), the DDS exceeded SSA quality targets for IN cases but was just below target for RC.

<b>FY22 Quality (%)</b>		
<b>Target</b>	<b>IN</b>	<b>RC</b>
	<b>90.6%</b>	<b>90.0%</b>
DDS	92.6%	89.2%
Region	92.8%	90.3%
Nation	93.9%	92.0%
Difference		
Target	<b>2.0%</b>	<b>-0.8%</b>
Difference		
Region	<b>-0.2%</b>	<b>-1.1%</b>
Difference		
Nation	<b>-1.3%</b>	<b>-2.8%</b>

DDS continues to struggle with quality due to several factors:

- We onboarded a significant number of new Disability Examiners and Medical Consultants in FY20 and FY21. The SSA disability program is extremely complex, and we anticipate it will take two years for new staff to gain the experience they need to perform on par with their more seasoned peers. Historically, newer DDS employees make more mistakes and can drive the overall DDS quality down. The class brought on in September 2020 has just now reached that threshold with the June 2021 having just recently passed their one year mark.
- DCPS is significantly lacking in any real functionality to capture cases for internal quality review compared to our legacy system. This results in more overall cases – and importantly those from our more inexperienced staff – being cleared without the opportunity for a second look. This not only adds more mistake prone cases to the volume sampled by SSA Office of Quality Review (OQR), it also provides the DDS fewer opportunities to provide targeted training for newer DDS staff.

- SSA policy and quality review processes are outdated and not in line with difficulties the DDS faces in processing cases in a post COVID environment. As a result, DDS quality as measured by SSA has trended lower across the nation since 2018. Oklahoma joined all other DDS in highlighting to SSA the critical and immediate need for fundamental changes in these areas.

While these factors certainly created barriers to maintaining high overall quality, the DDS recognizes our very low processing time may indicate that adjudicative staff could devote more time to scrutinizing medical records for additional sources and fully developing vocational issues – both cited in the majority of our SSA quality review returns. This will be a focus moving into FY 2023.

### Other FY 2022 Highlights

- DDS completed training for 12 new Disability Examiners who came onboard in June 2021.
- DDS hired and trained four Medical Consultants.
- DDS and Director Fruendt hosted the SSA Dallas Regional Commissioner, Janet Walker, and her staff in June.
- One DDS team member completed the OMES Certified Public Manager program October 28<sup>th</sup>, 2022. Three more were accepted for the program beginning in early 2023.
- DDS created CE and Quality workgroups to begin exploring ways to lower our overall CE rate while raising and maintaining quality. Their work is still ongoing.

### FY 2023 Production Estimates

With all SSA workloads fully in place and all DDS staff fully trained on DCPS, the DDS should be positioned to produce significantly more cases than in the previous fiscal year. We provided SSA with our estimates for all case types as part of our Annual Plan in September and with some adjustments based on SSA priorities, FY23 estimates are:

FY23 Production Estimate Breakout									
	Initial Cases			Reconsideration Cases			Continuing Disability Reviews		
	Estimate	% Difference from FY22 Target	% Difference from FY22 Production	Estimate	% Difference from FY22 Target	% Difference from FY22 Production	Estimate	% Difference from FY22 Target	% Difference from FY22 Production
DDS	36000	9.72%	13.89%	10339	22.64%	3.07%	10000	-14.13%	-9.21%
EST	11923	88.43%	88.48%	0	N/A	N/A	4680	-1.73%	-13.93%
Total	47923	29.30%	32.45%	10339	22.62%	3.05%	14680	-10.18%	-10.72%

Total DDS and EST estimated production for FY23 is more on par with historical clearances:

FY23 Estimate Summary			
DDS & EST Combined Total Estimates	Target	% Difference from FY22 Targets	% Difference from FY 22 Clearances
	72942	25.65%	24.37%

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Tiller', with a stylized flourish at the end.

Keith Tiller  
DDS Administrator