Decisions Regarding Field Office Closures

Appendices

Social Security Advisory Board

June 2020

SOCIAL SECURITY ADVISORY BOARD

SSAB

Appendix A. Service Area Review Guidelines[1]

The Board requested SSA's guidance for service area reviews, area director reviews, facility modifications, and assignment of new office codes for Operations facilities. On April 5, 2019, SSA provided a redacted version after a disclosure analysis under the Freedom of Information Act (FOIA). The Board is publishing this version for public access. SSA made minor redactions of internal control mailbox information, as well as internal website information pursuant to the FOIA Exemption 2.[2] Exemption 2 exempts from mandatory disclosure records "related solely to the internal personnel rules and practices of an agency." The information is restricted for use by SSA employees for official agency business; therefore, it is SSA's position that it is exempt from the disclosure requirements of the FOIA.

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[1] Social Security Administration. 2017a. Administrative Instructions Manual System, GAM 12.05 "SARs, Area Director Annual Reviews, Facility Modifications, and Assignment of New Office Codes for DCO Facilities" (January 12).

[2] Freedom of Information Act §552; 5 USC 552(b)(2) §552(b)(2).

ADMINISTRATIVE INSTRUCTIONS MANUAL SYSTEM

MANUAL: General Administration

CHAPTER: 12 Field Administration

INSTRUCTION NO.: 05

SUBJECT: Service Area Reviews (SARs), Area Director Annual Reviews, Facility Modifications (FMs), and Assignment of New Office Codes for DCO Facilities

Audience: Headquarters (h), Regional (r)

Level: SSA

Date: 1/12/2017

INQUIRIES: Questions regarding the content of this issuance should be directed to [redacted] in the Office of the Deputy Commissioner for Operations (ODCO), Office of Public Service and Operations Support (OPSOS).

12.05.00 Table of Contents

12.05.01 Purpose

This instruction explains the Service Area Review (SAR), Area Director Annual Reviews, Facility Modification (FM), and requests for the Assignment of New Office Codes for Deputy Commissioner for Operations (DCO) Facilities processes. It establishes national guidelines that will facilitate the review of Field Offices and the service they provide. It also contains the Delegations of Authority and documentation guidelines for proposals to modify facilities, service areas, area realignments, and requests for the assignment of Office Codes in the Detailed Office/Organization Resource System (DOORS) for DCO Components.

12.05.02 Policy

SSA's goal is to deliver service to the public in the most effective, efficient, and caring way possible. Customer feedback concerning obtaining access to SSA service supports the expanded functionality of all operating facilities [i.e., Field Offices (FOs), Program Service Centers (PSCs), Teleservice Centers (TSCs), Social Security Card Centers (SSCCs), and Office of Central Operations (OCO)] to create an integrated service delivery network. This network allows public choice and expanded options for service by providing access to SSA via the Internet, toll-free telephone system, fax, mail, face-to-face service, and appointments. Through the local FOs, SSCCs, Resident Stations (RSs), and Contact Stations (CSs); SSA strives to tailor service that will continue to meet the needs of the community.

12.05.03 Objective

A. SSA remains committed to providing tailored public service by employing a network of accessible community-based facilities. Periodically, SSA analyzes these offices to ensure that service delivery is consistent with the needs of the area being served.

B. Area Directors (AD) will conduct an annual review to identify offices for additional evaluation. Upon completion of the AD Annual Review, a full Service Area Review (SAR) may be conducted if the AD determines additional analysis is needed to determine if a change is needed (i.e., office upgrade, office downgrade, office consolidation, area realignment, etc.). Unscheduled SARs may be warranted when workloads increase or decrease, population increases or decreases, or other demographic factors change. Other reasons for conducting a SAR include staffing changes or imbalances and lease or space considerations. These events may initiate a SAR to ensure that a facility is fulfilling the Agency's mission in the best possible manner in its' given service area.

C. Facility changes require examination on a case-by-case basis. There are unique factors that impact each decision. These could include proximity of nearby offices (public transportation/parking for visitors), employee attrition, size of workloads, cost savings, lease expirations, safety and security of the office, and the quality of roads and geographic barriers. Each factor can play a role in these decisions. Other factors, including demographic changes, economic conditions, and private and public institutions, also influence the decision. All of these factors translate into service needs and SSA accessibility.

12.05.04 Definitions

Area Realignment: Realigning FOs into and out of an existing area.

BIF: The number of beneficiaries receiving Retirement, Survivors, or Disability Insurance payments as well as those entitled to Health Insurance only.

Contact Station: A temporary SSA facility in a location where SSA employees visit on a schedule to conduct SSA business. Contact stations provide face-to-face service for communities or neighborhoods distant from or not easily accessible to the Field Office. Institutional contact stations are located in an institution, such as a hospital. In most instances, anything other than free space should receive Headquarters' approval.

District: A Level 1 parent office and its' subordinate facilities.

Facilities: Level 1 FOs, Level 2 FOs, Resident Stations (RSs), and Contact Stations (CSs) in leased space.

Facility Modifications: Establishing a new facility, changing an existing office (CS to RS; RS to Level 2 FO; Level 2 FO to Level 1 FO; Level 1 FO to Level 2 FO; Level 2 FO to RS; RS to CS), or consolidating two existing offices are some of the common modifications.

Field Office: Level 1 FOs and Level 2 FOs.

FO Realignment: Realigning FO(s) and RS(s), between existing district(s).

Interchange of Offices: Switching the type of office (e.g., Level 1 and Level 2) within the same district.

Political Subdivision: A political subdivision is defined by congressional districts.

Relocation: A facility move within the existing service area.

Resident Station: A small, permanent facility that usually has no on-site management, but reports to a parent Field Office and serves a specific geographical segment of the District's service area.

RIF: The number of recipients for Federal and/or State Supplemental Security Income payments.

Service Area Review: A comprehensive review of a facility, and its' corresponding service area, to determine the service needs and the best methods of delivering service to the community.

Area Director Annual Review: This is an annual review of offices by an Area Director to determine if additional evaluation is needed. If additional evaluation is needed, a full SAR is conducted.

12.05.05 Delegations of Authority

Many service area changes can be approved at the regional level, while others require approval by the Deputy Commissioner of Operations (DCO). Delegations for all major changes are stated below.

DELEGATIONS OF AUTHORITY

Relocation of facilities	
Within same political subdivision	RCs
To another political subdivision	DCO
Interchange of Level 1 and Level 2 FOs	
In same or different political subdivisions	RCs*
Area realignments	
In same or different political subdivision	RCs*
FO realignments	
In same political subdivision	RCs
In different political subdivisions	RCs*
Establish CS service	RCs
Discontinue scheduled CS service	RCs
Facility Modifications	
Downward conversion of facilities	RCs*
Consolidation of facilities	RCs*
Establishment of new facilities	DCO
Upward conversion of facilities	DCO

*These decisions should be sent for DCO review and comment prior to implementation.

12.05.06 Overview

A SAR is a complete assessment of an office which may or may not result in a recommendation for change. The AD annual review identifies offices for additional evaluation. After completion of the AD Annual Review, the AD may determine that additional evaluation is need and a SAR may be conducted.

AD Annual Reviews and SARs, and the tracking of SARs, should be completed using the Service Area Review application. This web-based application gathers data for the user and assists in providing a complete picture of the office by including various data points for items such as staffing, demographics, BIFs, RIFs, etc. The application also provides functionality to track the movement of the SARs and current status.

Each Regional Office will request the Area Director Annual Review at the beginning of the fiscal year, with a due date for the certification on or before January 1. The Area Director will annotate whether or not additional analysis is required. Upon completion of the AD Annual Review, the AD will submit a certification to the Regional

Commissioner (RC) summarizing the review and identifying offices that may require additional evaluation. The RC will review each AD's assessment and, upon concurrence, the data will be saved. If additional review is needed, a SAR will be completed. Any proposed changes (i.e., upgrade, downgrade, realignment, new office, or consolidation) will be submitted by the RC to (b) (2) [redacted] on a flow basis.

Effective October 1, 2016, Regional Offices will be required to have all SARs for their Region completed within a 10-year period. Regional Offices can use their discretion to decide when each SAR should completed.

12.05.07 Scheduling

A. RCs are responsible for overseeing the SAR process in their regions. The identification and scheduling of the service areas to be reviewed, completion of the reviews, and acting on the results fall under their authority. Though CO does not require any progress reports, regional record keeping is required to assure full adherence to this instruction. On occasion, individual assessment information may be requested to respond to service inquiries at the national level.

B. Regional management will identify and schedule facilities for review. All facilities in a given district are generally scheduled for simultaneous reviews.

C. Several events may trigger unscheduled reviews. Some examples include staffing and workload shifts or imbalances, population or demographic shifts, environmental disasters, and lease or space considerations (e.g. lease expiration date). New conditions, such as completion of a major highway or relocation of a large public service organization, may also trigger scheduling of an SAR for the affected facility.

D. Conditions that cross service area lines or create a bond between service areas should also influence the scheduling of a review. Some examples include multiple service areas in one metropolitan area, geographical features that create natural boundaries, common means of transportation, and adjoining states, cities, and counties.

12.05.08 Frequency and Timing

Area Director Annual Reviews should be conducted each year at the beginning of the fiscal year, with a due date for the certification on or before January 1. Full Service Area Reviews are conducted as needed. Each service area should be reviewed at least once every 10 years.

12.05.09 Documenting the Assessment

Several factors, unique characteristics, special needs, and other criteria help to illustrate a **factual** picture of the current environment. The picture is then viewed to determine whether a SAR warrants a recommendation to maintain or change the existing service area. The region is responsible for data collection, analysis, and determining the impact each factor, characteristic, need, or criterion has on the service delivery for the facility being reviewed.

NOTE: All documentation in the assessment should be factual.

A. Demographic and Workload Factors

Information about the service area's demographics and workloads should be considered and documented in the SAR package. This data can be collected from the following sources:

1. Basic statistical data for individual FOs (population, staff, etc.) is available via the SAR application. Regions should include staffing numbers and eligible retirement information when submitting their SAR proposal to DCO.

2. Detailed statistical reports with census-type information on population, age, gender, race, ethnicity, income, education, housing, marital status, etc. are available on the Nielsen PrimeLocation web application and uses current information and projections for the next five years. It can produce geographical reports by state, county, city, ZIP code, congressional district, and SSA district, area, or region. Examples of standard reports used for SARs include Population Executive Summary, Pop-Facts Demographic Snapshot, Pop-Facts Demographic Trend, and ZIP Code Map for the SSA District. These reports may be requested from

the regional office.

3. The RIF/BIF Quarterly Report is available on the San Francisco Region's Intranet site at [redacted]. This application allows the user to request the latest RIF/BIF information from the Office of Research and Statistics (ORS) databases.

4. The current statistical data should be used in conjunction with historic statistical data from past Service Delivery Assessments (SDAs) and Service Area Reviews (SARs) for trend analysis, projections, and identifying characteristics.

5. Additional Management Information (MI) or demographic data may be used to obtain current information about the service area. To determine whether a source is appropriate, the region should email [redacted] for guidance.

B. **Accessibility Factors**

The following should be considered and documented in the SAR package:

1. Average distance and travel time to the FO;

2. Accessibility from major highways and roads;

3. Availability, convenience, and cost of public and privately sponsored transportation;

4. Availability, convenience, and cost of parking for the public and employees;

5. Accessibility for people with disabilities (transportation, parking, building accommodations, etc.).

6. Other methods of accessibility (e.g. online services, National 800 Number).

C. Unique Characteristics and Special Needs

Data regarding various aspects of service (workload origination and point of receipt, telephone service, and waiting times) can include local as well as area and regional studies. It can also include local customer surveys of needs and satisfaction. This data should be considered, but documented only if relevant to the assessment. The SAR package should explain the importance of the relevant data. The following list highlights those characteristics or needs that are commonly distinct for many service areas. It is not all-inclusive.

1. Safety/high risk location

2. International border location

3. Bilingual needs

4. Minority population needs

5. Location of trade or business centers

6. Social service/community agencies and organizations

7. Significant parallel activities

8. Advocacy groups

9. Major institutions (e.g., educational, medical, cultural)

10. Communications media outlets (target audiences, extent of coverage)

11. Large employers

12. Third party assistance arrangements

12.05.10 Completing the SAR

A. A narrative analysis of the service area. When including several facilities in the scope of the review (e.g., a district's service area) a combined narrative that includes the analysis for all of the facilities should be prepared. The analysis should include:

1. A description of the service area:
   - Geographic boundaries
   - Size/square miles
   - List of the counties/ZIP codes
   - Geographic and topographic features which affect service area deliver.
2. A description of the current service delivery methods
   - Field facilities in the area (FOs, SSCCs, RSs, and CSs)
   - Percent of interviews completed on an appointment basis, teleservice, and face-to-face service
   - Electronic service data
   - Outreach
   - Public information/public relations
   - Any other methods used
3. The accessibility assessment as outlined in AIMS, GAM 12.05.09.B
4. The unique service area characteristics and special needs as outlined in AIMS, GAM 12.05.09.C
5. Any trends noted in the analysis such as population and workload trends
6. All other information material to maintaining or changing the existing methods of service delivery

NOTE: If the SAR provides a "no change" recommendation, the package should be retained electronically in the FO and RO until a new SAR is completed. However, if the SAR results in a recommendation to make changes in service delivery, the region should take appropriate action.

Refrain from stating opinions as fact when writing and submitting the SAR package. The SAR package should contain factual information. An example of a statement would be, "As the facts show, there has been an increase in the population."

12.05.11 Recommendation for Change Proposals

A. A SAR resulting in a recommendation for change should lay out the benefits to be gained by the proposed change and provide a picture of the new/changed areas. Benefits to be gained by the proposed change should be supported by factual information. Some change proposals are more controversial than others are. An example of a controversial change is one that would involve a change in congressional districts. An example of a non-controversial change is one in which an office is seeking new office space within the same congressional district. If the proposal will affect other existing facilities in the area, these changes and facts should also be documented as follows:

1. The expected service delivery improvements as a result of the change.
2. How the special needs of the existing service area will be met under the proposed change.
3. The type of presence, if any, that will be maintained in the old location.
4. Changes in the facility structure of the service area.
5. If the change is determined to be controversial, the documentation should address these issues.
6. Information about each new/consolidated facility/service area:
    - Location in relation to business centers and community services;
    - Space availability and arrangements - availability and cost of suitable space for housing the new/relocated or consolidated office (Federal or leased space as determined by GSA);
    - Physical boundaries and size;
    - Population;
    - Studies on walk-in traffic and ZIP code surveys;
    - BIFs/RIFs;
    - Electronic Service data;
    - Accessibility;
    - Distance in miles for offices;
    - Longest increased travel time for employees and members of the public;
    - Availability, convenience, and cost of public and privately-sponsored transportation;
    - Availability, convenience, and cost of parking for the public and employees;
    - Accessibility for people with disabilities (transportation, parking, building accommodations, etc.)
7. Resources and cost factors should be considered.
8. Congressional and Public Reaction:
    - After DCO approval, a congressional fact sheet will be sent to the Office of Legislative and Congressional Affairs (OLCA). Only after coordination with OLCA can discussions about any significant service delivery change (for example, consolidation or move to another political subdivision) be held with affected U.S. Senators, Representatives, and their respective staff members.

- All affected Senators and Representatives should personally know about the proposed changes. If a personal meeting with the Senator or Representative is not feasible, the region should ensure that a congressional staff member discusses the changes with the Senator or Representative. In addition to sending written notification (**most preferably** by e-mail) regarding the proposed change, phone contact must be made with the congressional member or member's staff who represents the member. Discussions with the congressional member's secretary or clerical aid is not sufficient. The proposal should contain and document the contacts.

- Notice of an office move within the same political subdivision should be given to affected U.S. Senators and Representatives prior to implementation.

- Discussions should also be held with all other parties who may have a stake in the proposed changes to ensure all concerns are properly addressed. This would include contacts with key community leaders (mayor, city council, etc.), unique institutions (schools for the blind, hospitals, prisons, etc.), advocacy groups, community based organizations that represent SSA clients, employees, and the union. Such discussions should be thoroughly documented in the staff working files held in the RO. These contacts should be made after the recommendation is forwarded for DCO approval or concurrence.

B. Following receipt of DCO and OLCA approval, the discussions with affected U.S. Senators, Representatives, and all other parties should be held. The RO should keep DCO apprised of the outcome of each of these discussions. Discussions should be held simultaneously at the local and national level.

C. Following receipt of DCO and OLCA approval, key headquarters' contacts for major projects that may be impacted by the proposed action, such as IWS/LAN, IVT and ergonomic furniture (installation or reconfiguration), should be notified of the service delivery changes. The components responsible for these activities will work with the region to plan a smooth transition. Due to the design and contractor work, which precedes actual onsite activity for each of these activities, it is important to provide notification as early as possible. In addition, regional contacts should be notified of the service delivery changes to ensure that regional components work with local management to make other changes resulting from the proposed action.

D. Any service area change requiring DCO review, comment, or approval prior to implementation should be electronically transmitted by the region to (b) (2) [redacted]. Specific documentation required for proposals of major service delivery changes are stated below:

1. **Relocation of a Facility From One Political Subdivision to Another**

   Proposals should include:

   - Rationale for the move;
   - Description of the proposed new location;
   - Accessibility of the proposed new location (see AIMS, GAM 12.05.09.B);
   - Any service delivery option changes that will result;
   - Any effect on parallel organizations and institutions;
   - Any impact on staff;
   - Expected community and congressional/political reaction; and
   - Lease information.

2. **Interchange of Level 1 FO and Level 2 FO**

Proposals should document the factors that justify the exchange and explain the rationale.

3. **Area Realignments**

Proposals should contain a rationale for the proposed change and include a before-and-after picture of the areas, including:

- Number and types of facilities in each area;
- Number of employees in each area;
- Maps displaying the geographic boundaries of the involved facilities and the areas;
- Documentation regarding current and proposed BIFs and RIFs and population data is required.

4. **FO Realignments**

In addition to the SAR documentation, these proposals should:

- Provide rationale for the realignment;
- Include any changes that will result in the facility structure of the involved district(s); and
- Include any change in the management position(s) in the affected offices.

5. **Service at Contact Stations (CSs)**

- The RCs have the authority to establish or discontinue scheduled CS service.
- The region should maintain up-to-date CS information on the Contact Station Report Database. The region should submit confirmation at the end of each Fiscal Year Quarter indicating the information on the database is current.

6. **Downward Conversion of Facilities (Includes downgrading a RS to a CS)**

Proposals should document all of the factors that justify downward conversion.

7. **Consolidation of Facilities**

Proposals should document all of the factors that justify consolidation. The following additional information must be included in the proposal:

- Space/Office Information - type of space, lease expiration and lease termination rights
- Staffing Data – total number of staff and eligible retirement information
- Change of Station, directed reassignment, and other funding needs
- Longest increased commute for employees and members of the public
- VIP/FONE Information – average monthly visitors, average monthly calls

- Population Information
- Proximity of other offices in miles
- The demographics and workload assessment as outlined in AIMS, GAM 12.05.09.A

8. **Establishment of New Facilities (Includes changing a RS to a Level 2 FO)**

   Proposals should document all of the factors that justify realignment.

9. **Upward Conversion of Facilities (Includes upgrading a CS to a RS)**

   Proposals should document all of the factors that justify upward conversion.

E. Implementation information about any approved service delivery change should be electronically transmitted to (b) (2) [redacted].

1. **Specific documentation required for this notice requires:**
   - Effective date of change;
   - Any changes in site administrative code (SAC);
   - Any changes in management information (MI) allotment; and
   - Any changes in ZIP Code(s).
2. **OPSOS will provide notice to the appropriate CO components.**

12.05.12 Field Office Service Zone Improvement Plan (ZIP) Code Changes

A. ZIP Code changes should be reported to update the information on the MBR, SSR and DOORS. These changes include:

1. A ZIP code, made obsolete by the United States Postal Service (http://www.usps.com/), is replaced by a new ZIP Code.
2. A ZIP Code assigned to one office is reassigned to another office as a result of service area realignment, or in situations where an area splits into 2 or more additional ZIP Codes. If the ZIP code realignments involve changes in congressional districts, the memorandum should address this issue as well.
3. Addresses are adjusted to other ZIP Codes that result in a partial ZIP Code change.

B. The region should take the following action:

1. Prepare a memorandum reporting the change with the following information:
   - Type of change;
   - City affected;
   - ZIP Code(s) involved;
   - Old and new ZIPs, if applicable;

- Effective date of change;
- Servicing Office name; and
- District Office Code (DOC).

2. E-mail the memorandum to [redacted]. To make changes effective for a given month, the memorandum should be sent at least 90 days before effective date (e.g., e-mail the memorandum by July 1, to make changes effective on October 1).

3. Regional DOORS administrators should ensure that DOORS is updated appropriately.

C. Updates to the MBR/SSR should occur within 6 to 8 weeks from the time that CO receives the FO's request. The FO receives notification if a delay of more than 4 months is expected.

D. Mass ZIP Code changes should be reported to CO per POMS GN 02605.045.

12.05.13 Requests for Assignment of New Office Codes in the Detailed Office/Organization Resource System (DOORS) for DCO Components

A. The DCO DOORS Administrator is responsible for assigning new FO codes for Regional Offices (ROs) (Includes PSCs/TSCs/FOs). The approving official (at the RC level) is to forward requests to establish a new site with an office code in DOORS electronically to the DCO DOORS Administrator. DCO DOORS Administrators can be located at the following link: [redacted]. The request should include the following information:

1. General summary providing type of office being established and its' primary function;
2. Formal Name of Office;
3. Physical Location;
4. Administrator Phone Number;
5. Contact; and
6. Certification that approval for the establishment of a new office has been approved at the appropriate level in DCO.

B. The DCO DOORS Administrator will establish the office in DOORS and provide notice to the appropriate components.

12.05.14 Field Office Criteria

A. Level 1 Field Office Criteria

A Level 1 office must meet Element I and either Element II or Element III (FO must have been established before 10/01/2008).

1. **Element I:** To receive credit for this element, the District Manager must have at least two subordinate managers (including supervisors and management support specialists) AND the District Manager must report directly to the Area Director.

2. **Element II:** To meet this element, the district must meet one of the following:

   - A service area population of 500,000 or more;

- The service area has 75,000 or more BIFs;
- The service area has 12,500 or more RIFs; or
- The service area population is 200,000 or more, there are 40,000 or more BIFs, and 3,000 or more RIFs.

3. **Element III: This element can only be used to retain Level 1 status, not to upgrade an office to a Level 1 status.** To meet this element, the district must meet one of the following:

   - The service area must be located in a major metropolitan area whose Metropolitan Statistical Area (MSA) exceeds a population of 750,000 and whose service area population is 200,000 or more AND must meet two of the following:
     - 20 percent or more of the households in the service area have household incomes that are less than $15,000 per year;
     - 40 percent or more of the claims and PE work is SSI related;
     - 40 percent or more of the claims are disability related (DIB and SSI).

   OR

   - The service area must be located in a major metropolitan area whose MSA exceeds a population of 750,000 AND must meet two of the following:
     - 30 percent or more of the households in the service area have household incomes that are less than $15,000 per year;
     - 60 percent or more of the claims and PE work is SSI related;
     - 60 percent or more of the claims are disability related (DIB and SSI).

B. Level 2 Field Office Criteria

1. A Level 2 field office is an office with at least one management employee on its' staff that does not meet the criteria for a Level 1 office.
2. DCO is the decision-maker for any proposals to upgrade a Level 2 office to Level 1 status. For an upgrade to be approved, an office must meet Elements I and II. In addition, when a Level 2 office is proposed for upgrade, the current Level 1 office must be able to meet Element I and Element II.

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