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Reading Level for Spanish-Speaking Clients Receiving Social Security Administration Spanish Language Notices - A-06-96-62200 - 1/30/97

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EXECUTIVE SUMMARY

PURPOSE

To provide the Social Security Administration (SSA) with information concerning the appropriate reading level for Spanish-speaking clients receiving SSA Spanish language notices.

BACKGROUND

This inspection resulted from discussions with SSA officials on two Department of Health and Human Services/Office of Inspector General (HHS/OIG) reports: 1) "Clarity of SSA Notices," and 2) "Clarity of Supplemental Security Income Notices." SSA found the reports helpful in evaluating the effectiveness of its current and proposed notice revisions, and requested additional assistance in providing information on the appropriate reading level for Spanish-speaking clients.

SSA relies on over 250 million notices and forms sent to the public each year to: 1) communicate decisions about eligibility for benefits, 2) inform beneficiaries of their rights and responsibilities, and 3) describe avenues of appeal. Some Retirement, Survivors, and Disability Insurance (RSDI) notices are available in Spanish. All automated Supplemental Security Income (SSI) notices are available in Spanish.

SSA is committed to improving the quality of its written notices. In February 1985, SSA published "Social Security Administration Notice Standards" (Standards) to improve the readability of notices and provide criteria to produce uniform and clear notices. The Standards have been revised twice. SSA's customer service pledge, included in the Standards, states, "We will clearly explain our decisions so you can understand why and how we made them and what to do if you disagree."

We conducted an extensive literature search and conducted personal and telephone interviews with 46 individuals at 39 agencies and organizations to: 1) inquire if they have developed methods for determining a reading level for their Spanish-speaking readers, 2) obtain their views on the most effective ways of helping Spanish-speaking individuals to understand written materials, and 3) determine if they have developed or are using software programs to assess the readability of material written in Spanish.

FINDINGS

Method for determining the reading level for Spanish-speaking individuals has not been developed.

Respondents stated they: 1) have not developed, or are not aware of, a method for determining the most appropriate reading level for Spanish-speaking individuals; and 2) have not developed, nor are they using, a computer software program to assess the readability of material written in Spanish.

Reading level established for English language material is appropriate for Spanish-speaking individuals.

Eleven of 13 respondents referencing SSA's reading level for English notices stated that, if notices are accurately translated, the same reading level is appropriate for Spanish notices. Respondents believed that, if English notices meet SSA's Standards, translating them into Spanish should be a fairly simple process.

Respondents provided ideas for continued notice improvements.

Respondents provided ideas for making Spanish notices more understandable for Spanish-speaking clients, including: 1) using employees who are as fluent in the Spanish language as they are in the English language to do the translations, 2) using a glossary to assure consistency, 3) translating material accurately, and 4) conducting focus groups on the readability of notices.

Literal translation of English notices is not recommended.

A literal translation may not, in fact, get the desired message across to those reading the material in Spanish. Respondents provided reasons why English to Spanish translation cannot be done verbatim, including: 1) no language can be translated verbatim because words and sentence structures do not correlate; and 2) the Spanish language generally uses more words to make a statement than English.

Two methods for translating written material.

Respondents provided information on two possible methods for translating notices from English to Spanish, including: 1) having employees, whose knowledge of the Spanish language is as strong as or stronger than their knowledge of the English language, serve as translators; and 2) contracting out the translation of notices to a good professional translator.

Problems exist in current translation software.

Respondents stated that no software program produces a perfect translation. All programs require knowledge of the language being translated and some form of human intervention, such as building dictionaries and redoing documents.

RECOMMENDATIONS

SSA's efforts to improve the overall quality of notices will enable SSA to provide understandable Spanish notices. SSA's reading level for material written in English appears appropriate for Spanish-language notices. Further, if SSA is to provide notices in languages other than English or Spanish (e.g., in Russian, Chinese, Vietnamese, etc.), SSA should be able to provide accurately translated notices by duplicating its efforts in translating English notices into Spanish. SSA should continue improving the readability of Spanish language notices by:

- conducting focus groups to obtain participant information on the readability of notices;
- adhering to SSA's Standards for preparing both English and Spanish notices;
- enhancing the English-Spanish Glossary of Social Security Administration Terminology (replace poorly understood words or phrases), and, further to continue promoting consistency of terminology, providing the Glossary to all SSA offices;
- ensuring SSA staff doing the translations have adequate skills and tools needed to do the translations;
- considering using the Spanish version of "Grammatik" when it becomes available— SSA should determine that this software meets its needs for producing accurate Spanish notices (SSA currently uses the English version of this software to write English material at the desired grade level); and
- identifying staff capable of and interested in translating.

AGENCY COMMENTS

In its written comments to the draft report, SSA agreed with the findings and the thrust of our recommendations.

OIG RESPONSE

We appreciate SSA's comments to this report. We would also like to acknowledge the assistance provided by the Notice Policy Staff during the course of this study.

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INTRODUCTION

PURPOSE

To provide the SSA with information concerning the appropriate reading level for Spanish-speaking clients receiving SSA Spanish language notices.

BACKGROUND

This inspection resulted from discussions with SSA officials on two prior HHS/OIG reports: 1) "Clarity of SSA Notices," OEI-07-90-02410; and 2) "Clarity of Supplemental Security Income Notices," OEI-07-90-02460. SSA found the reports helpful in evaluating the effectiveness of its current and proposed notice revisions, and requested additional OIG assistance in providing information on the appropriate reading level for Spanish-speaking clients.

SSA relies on over 250 million notices and forms sent to the public each year to: 1) communicate decisions about individuals' eligibility for benefits, 2) inform beneficiaries of their rights and responsibilities, and 3) describe avenues of appeal. Some RSDI notices are available in Spanish. All automated SSI notices are available in Spanish. Some high volume public forms, such as the Application for a Social Security Card, Form SS-5, are also available in Spanish.

Because of the high volume of notices mailed to SSA clients, almost all of the processes for generating and mailing materials are automated. While most of the RSDI notices are generated by 1 of about 15 different computer systems, those for the SSI program are generated by a single computer system. Information included in the notices is from a compilation of computer-selected paragraphs in the different systems.

Spanish-speaking Population in the United States Continues to Grow

Over the past decade, more than a third of the United States' population growth was due to immigration. Recent immigrants came predominantly from Asian- and Spanish-speaking countries. Further, data from the 1990 U.S. Census show: 1) Spanish-speakers comprise a rapidly growing segment of the population in the United States; 2) many of the immigrants are recent arrivals; 3) excluding Puerto Rico, 13.8 percent of the population age 5 years and older speak a language other than English in the home—with 53 percent of these speaking Spanish; and 4) nearly half of the Spanish-speakers reported they do not speak English very well.

The Spanish-speaking elderly population is growing faster than any other segment of the population. It is estimated that this population, which accounted for 3.6 percent of the total elderly population in 1990, will increase to 6.3 percent in 2010 and 11.7 percent in 2050.

Pursuant to a 1988 congressional request, the U.S. Department of Education's National Center for Education Statistics and Division of Adult Education and Literacy conducted a national household survey of the literacy skills of adults in the United States. The report, issued in September 1993, states that of all the racial/ethnic groups, Hispanic adults reported the fewest years of schooling in this country—on average, just over 10 years, compared to 11.6 years for African Americans and 11.7 years for Native Americans/Alaskans.

SSA's Notice Standards

SSA is committed to improving the quality of its written notices, and has taken a number of steps designed to improve the readability of notices and to provide guidelines for producing uniform and clear notices. In February 1985, SSA published the first edition of its Standards. The Standards were revised in July 1989 and required that notices: 1) be written at a sixth-grade reading level, 2) contain no jargon, 3) have an average sentence length of 15-20 words, and 4) have paragraphs no longer than 7 lines. The Standards, revised again in August 1995: 1) required that notices be written at a sixth- to eighth- grade reading level, 2) further refined the elements of a clear notice, 3) included additional guidance on how to write notices, and 4) included standards for Spanish notices. SSA's customer service pledge, included in the August 1995 edition of the Standards, states, "We will clearly explain our decisions so you can understand why and how we made them and what to do if you disagree." SSA states that 70 percent of the notices have been improved, and estimates

that, under current plans, it will take several years to apply the Standards to all notices.

In early 1992, SSA developed a Tactical Plan called *Access 6.1 Improve Access to SSA: Accelerate Notice Improvements*. The goals of this plan include: 1) improving public service, public confidence, and access to SSA by improving the quality of the notices; 2) assessing SSA's methods of communicating with the largest groups of its non-English speaking (NES) customers in order to eliminate the need for repeated and/or lengthy contacts with SSA; and 3) accelerating the pace of notice improvement activities.

Studies Involving SSA Notices

A number of SSA studies have evaluated notices, including the following:

- In 1987, Portfolio Associates, Incorporated, conducted a study for SSA on revised SSA notices. Study participants reported that, although the revised notices were written in simple, straightforward, and understandable style, some passages were difficult to understand and others contained jargon.
- A May 1992 SSA report, "SSA's Capability to Accommodate the Needs of the Non-English Speaking Public," provided an overall picture of what SSA was doing to meet the needs of NES individuals as well as what needs were not being met. The report states, "There is a growing non-English speaking public, both in terms of numbers and diversity of languages spoken, that needs service from SSA." Further, this report also presents the impact on bilingual employees of delivering these services; for example, a large gap exists between the public's need for bilingual services and SSA's capacity to meet that need with its own resources.
- In 1992, Quarles, Schnurr, and Associates, conducted a study for SSA on the clarity of two different RSDI notices and one SSI notice and pamphlet. Focus group participants were confused by one of the RSDI notices, but had little trouble understanding the second one. The SSI participants had a difficult time understanding how payment amounts were calculated in the SSI notice, but had little trouble understanding the pamphlet.
- In 1994, SSA started conducting focus groups in Spanish and English to: 1) determine the readability of notices, and 2) gauge public reaction to implemented notice changes. Participants provide information on the readability of notices, difficulties encountered, and suggestions on how the notices can be better written for them to understand.

General Accounting Office Testimony and HHS/OIG Studies

Congressional testimony by the General Accounting Office (GAO) and studies conducted by HHS/OIG identify problems similar to those identified in SSA's studies. GAO's testimony indicates that many SSA letters are difficult to understand. OIG studies indicate that individuals, including NES individuals, continue having problems understanding some of SSA's mail. A listing of studies on SSA notices is found at Appendix A.

The HHS/OIG report, "Employee Opinions of Social Security Notices," OEI-05-92-00042, stated that the clarity of SSA's notices has been a concern of SSA, the courts, and the Congress for many years. Further, judicial actions requiring SSA to add specific language to its notices have compounded the problem by adding wording that not only increases the overall length of notices, but also affects their readability. A listing of court decisions affecting SSA notices is found at Appendix B.

SSA Initiatives to Serve Spanish-speaking Individuals

SSA has undertaken several initiatives to provide quality service to Spanish-speaking applicants and clients, including:

- Developing Program Operations Manual System guidelines for determining when individuals should or should not receive Spanish language notices and forms.
- Coding the Master Beneficiary Record and the Supplemental Security Record with a Spanish language indicator. The indicator identifies individuals who need or ask to receive mail in Spanish.
- Identifying and obtaining information about how other agencies and organizations provide

services to NES individuals. For example, SSA representatives visited Washington State's Department of Social and Health Services to obtain information on providing services to NES individuals.

- Creating a task force to develop an Agencywide policy on delivering appropriate service to NES individuals.

- Contacting agencies and organizations to obtain their views on the most effective reading levels for Spanish-speaking individuals.

METHODOLOGY

For this study, we conducted an extensive literature search and conducted personal and telephone interviews with 46 individuals at 39 agencies and organizations to:

- 1) inquire if they have developed methods for determining a reading level for their Spanish-speaking readers;

- 2) obtain their views on the most effective ways of helping Spanish-speaking individuals to understand written materials; and

- 3) determine if they have developed or are using computer software programs to assess the readability of material written in Spanish.

We also shared one of SSA's Spanish language letters with four of our contacts for comments on the readability of the letter.

The following table provides a summary of the number of individuals contacted at the various agencies and organizations. A more detailed listing of our contacts is found at Appendix C.

Type of Entity Contacted	Number Contacted	Number of Individuals Contacted
Federal Agency	4	8
State Agency	6	9
Education (Bilingual and Elementary)	2	4
University	6	6
Research Group	2	2
School Book Publisher	1	1
Advocacy Group	1	1
Magazine	3	3
Newspaper	6	6
Community Based Organization	3	3
Translation Service	2	2

Software Company	3	3
Total	39	48

Our evaluation work for this study was conducted during the period from June 1995 through March 1996.

This inspection was conducted in accordance with the Quality Standards for Inspections issued by the President's Council on Integrity and Efficiency.

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FINDINGS

Method for determining the reading level for Spanish-speaking individuals has not been developed

Respondents stated they: 1) have not developed, or are not aware of, a method for determining the most appropriate reading level for Spanish-speaking individuals; and 2) have not developed, nor are they using, a computer software program to assess the readability of material written in Spanish. One of the software companies contacted is developing the Spanish version of "Grammatik" that will allow users to write Spanish material at a desired grade level. SSA currently uses the English version of the software to write English material at the desired grade level.

Reading level established for English language material is appropriate for Spanish-speaking individuals

Eleven of 13 respondents referencing SSA's reading level for English notices stated that, if notices are accurately translated, the same reading level is appropriate for Spanish notices. Four respondents (magazine editor, Sociology professor, researcher, and State agency employee) reviewed one of SSA's Spanish letters, "Administración de Seguro Social, Seguridad de Ingreso Suplementario--Petición de Información (PE)," ("Social Security Administration, Request for Information [PE]"). These respondents stated the letter should be understood by most readers. They suggested changing only a few words and identified some errors in capitalization and use of accents.

Respondents believed that, if English notices meet SSA's Standards, translating them into Spanish should be a fairly simple process. One respondent stated that at her agency, as a general rule, the reading level, style, etc., are dictated by the English version, and the translators try to maintain the same reading level as the English document.

Respondents provided ideas for continued notice improvements

Respondents provided ideas for making SSA's Spanish notices more understandable for Spanish-speaking clients. We found that SSA is currently addressing the respondents' ideas, which include:

- Using employees who are as fluent in the Spanish language as they are in the English language to do the translations.
- Using a glossary to assure consistency.
- Using "Spanish" words that will be understood by all readers, i.e., not using colloquialisms.
- Translating materials accurately.
- Conducting focus groups on the readability of notices.
- Using simple English on notices that will make translation into Spanish much easier and result

in clearer notices.

- Including the English word and/or phrase in parentheses when using technical and medical terminology. This will help readers of the notices to better understand the information being conveyed.

Literal translation of English notices is not recommended

A literal translation may not, in fact, get the desired message across to those reading the material in Spanish. Respondents provided the following comments on literal translations:

- Make sure you get a translation and not a transliteration that will not read well in Spanish and will be hard to understand.
- No language can be translated verbatim because words and sentence structures do not correlate.
- Quality is not translating word-for-word, but, rather, in correct translations.
- The Spanish language generally uses more words to make a statement than English; Spanish notices are about 25 percent longer than English notices.
- We have had no luck with literal translations.

SSA's Standards direct employees: 1) to translate concepts, not words--the Spanish translation must have the same meaning as the English; and 2) when translating notices into Spanish, to consult the English/Spanish Glossary of Social Security Administration Terminology to ensure that the terms used are consistent with Agency-approved terminology.

Two methods for translating written material

Respondents provided information on two possible methods for translating notices from English to Spanish, including:

- Having employees, whose knowledge of the Spanish language is as strong as or stronger than their knowledge of the English language, serve as translators. One respondent stated that care must be exercised when doing translations. This respondent's agency has translated publications which include words and/or phrases that are not understood by, or are offensive to, some clients in different parts of the country. Respondents from newspapers and magazines (e.g., Los Angeles East Magazine, Reader's Digest, and Editorial América which has over 14 magazines in Spanish, including Cosmopolitan and Harper's Bazaar en Español) stated they use employees who write well in Spanish. It should be noted that SSA already has staff translating notices from English to Spanish.
- Contracting out the translation of notices to a good professional translator. However, a State agency respondent stated that contracting out the work is somewhat expensive. Another respondent stated that, if vendors are used to do the translations, there may be a problem with their not knowing the program and, therefore, not knowing the appropriate program wording/language to be used.

Problems exist in current translation software

- Respondents (including two individuals from companies who provide translation software) stated that no software program produces a perfect translation. All programs require knowledge of the language being translated and some form of human intervention, such as building dictionaries and redoing documents. Overall, the 10 respondents who have used translation software have not been impressed with the results. The main problem is the literal translation of English words into Spanish, resulting in significant post-translation editing. The City University of New York and the Internal Revenue Service, after testing several software programs, use a program provided by the Pan American Health Organization. This program, too, requires human intervention.

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RECOMMENDATIONS

SSA's efforts to improve the overall quality of notices will enable SSA to provide understandable Spanish notices. SSA's reading level for material written in English appears appropriate for Spanish-language notices. Further, if SSA is to provide notices in languages other than English or Spanish (e.g., in Russian, Chinese, Vietnamese, etc.), SSA should be able to provide accurately translated notices by duplicating its efforts in translating English notices into Spanish. SSA should continue improving the readability of Spanish language notices by:

1. conducting focus groups to obtain participant information on the readability of notices;
2. adhering to SSA's Standards for preparing both English and Spanish notices;
3. enhancing the English-Spanish Glossary of Social Security Administration Terminology (replace poorly understood words or phrases), and, further, to continue promoting consistency of terminology, providing the Glossary to all SSA offices;
4. ensuring SSA staff doing the translations have adequate skills and tools needed to do the translations;
5. considering using the Spanish version of "Grammatik" when it becomes available—SSA should determine whether this software meets its needs for producing accurate Spanish notices (SSA currently uses the English version of this software to write English material at the desired grade level); and
6. identifying staff capable of and interested in translating.

AGENCY COMMENTS

In its written comments to the draft report, SSA agreed with the findings and the thrust of our recommendations. SSA also provided information regarding the activities they have taken and are planning to take to address the recommendations. The full text of its comments is provided in Appendix D.

OIG RESPONSE

We appreciate SSA's comments to this report. We would also like to acknowledge the assistance provided by the Notice Policy Staff during the course of this study.

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APPENDICES

APPENDIX A

General Accounting Office Testimony and Department of Health and Human Services/Office of Inspector General Studies on Social Security Administration Notices

General Accounting Office (GAO) testimony and Department of Health and Human Services/Office of Inspector General (HHS/OIG) studies on Social Security Administration (SSA) notices include the following:

GAO Testimony

- In March 1994, GAO testimony before Congress indicated that, while SSA has standards for written communications to improve the readability of letters, other problems, not associated with readability and design, exist to make many letters difficult to understand. Among these problems are illogical order and a lack of details to support decisions.

HHS/OIG Studies

- Since 1987, OIG has conducted annual client satisfaction surveys. From 1987 through 1991 the number of people reporting SSA mail easy to understand declined from 76 percent to 63 percent. From 1992 through 1995, the number of people finding SSA mail hard to understand declined after increasing in 1993: 15 percent in 1992; 17 percent in 1993; 15 percent in 1994; and 13 percent in 1995.
- In 1994, OIG conducted a client satisfaction survey of several specific subgroups including non-English speaking (NES) clients. This survey was the result of SSA and OIG concerns with the continuous low ratings by certain client subgroups. While NES clients' overall satisfaction rating rose from 69 percent in 1992 to 76 percent in 1994, the ratings for most SSA services remained low. The NES clients were over three times more likely than English-speaking clients to find SSA mail hard to understand (47 and 13 percent, respectively). Further, 6 percent of these individuals prefer their mail in a language other than English, with 67 percent preferring Spanish.
- In its 1995 report, "SSA Spanish-speaking Client Satisfaction in the United States," OIG reported that, when SSA provides services in Spanish, NES clients report a higher level of satisfaction. For example, those receiving their last service in Spanish reported a higher level of satisfaction than those last served in English, as well as higher levels of understanding and staff courtesy. Further, being helped in Spanish in person and by telephone, and receiving mail in Spanish, was rated as very important by at least 85 percent of the clients.

Forty-eight percent received mail which was written partly in English and partly in Spanish, 15 percent received mail written in Spanish, and 36 percent received mail written in English.

Spanish-speaking clients reported using different methods to interpret mail not written in Spanish. Most individuals (57 percent) asked a friend or family member to translate their mail and 12 percent took it to an SSA office. Only 28 percent said they read the mail themselves. Fifty-eight percent said their mail was easy to understand; 20 percent said it was difficult to understand. The main reason given for the difficulty was that it was written in English; other clients reported that content and words were difficult to understand.

- In its 1995 report, "SSA Spanish-speaking Client Satisfaction in Puerto Rico," OIG stated that, while still high, overall satisfaction dropped for Spanish clients who received mail in English. Mail is the one service Puerto Rican clients do not receive in their native language. Half of those receiving some or all of their mail in English were less satisfied overall than those whose mail was in Spanish only.

- In the 1992 study, "Clarity of Social Security Notices," OIG found that: 1) the Social Security Administration Notice Standards (Standards) worked when used, but were not uniformly applied to all automated notices; 2) several notices do not comply with the Standards (i.e., have high reading levels, use jargon, etc.); and 3) SSA has no ongoing process for reviewing notices.

- In its 1994 report, "Employee Opinions of Social Security Notices," OIG found that: 1) 48 percent of the surveyed employees identified at least one notice, letter, or other SSA printed material they believed needed improvement; and 2) 84 percent of the teleservice center employees described a notice, letter, or other printed material they believed needed improvement. These notices needed improvement because of the public's confusion due to: missing information, the use of jargon, the reading level being too high, the material being too long and rambling, the inclusion of unimportant information, and/or the lack of an orderly presentation of facts.

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APPENDIX B

Court Decisions Affecting Social Security Administration Notices

Court decisions affecting the Social Security Administration (SSA) notices include, but are not limited to, the following:

- In Buffington v. Weinberger (1974) the Secretary of the Department of Health and Human Services (HHS) was ordered to revise the initial overpayment notice to provide more information about recoupment procedures.
- In Califano v. Elliott (1978) the court said the recoupment notice must be plainly and clearly communicated, and suggested the notice include the reason for overpayment, a statement of the right to request reconsideration and waiver, and notice of the right to a prerecoupment hearing.
- In Cruz v. Califano (1978) Secretary of HHS was ordered to provide appeal notices and forms in Spanish in disability cases under title II and title XVI of the Social Security Act.
- In Soberal-Perez v. Heckler (1984) the court found there was no due process violation when the Secretary failed to provide notices and oral instructions in Spanish. However, the court stated that SSA remained bound by the Cruz agreement.

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APPENDIX C

AGENCIES AND ORGANIZATIONS (Number of Individuals Contacted)
<p>Federal Agencies</p> <ol style="list-style-type: none"> 1. Internal Revenue Service (1) 2. Immigration and Naturalization Service (2) 3. Social Security Administration (3) 4. U.S. Department of Agriculture (2)
<p>State Agencies</p> <ol style="list-style-type: none"> 1. State of Washington Department of Social and Health Services (1) 2. Texas Department of Health, Bureau of Nutrition Services (2) 3. Florida Department of Health and Rehabilitative Services (1) 4. New York State Department of Social Services (1) 5. New York Department of Health (1) 6. Connecticut Department of Children and Families (3)
<p>Education (Bilingual and Elementary)</p> <ol style="list-style-type: none"> 1. Dallas Independent School District (3) 2. Texas Education Agency, Division for Bilingual Education (1)
<p>Universities</p> <ol style="list-style-type: none"> 1. University of Florida, Department of Education (1) 2. Humboldt State University, Department of Sociology (1) 3. University of New Mexico, Government Information Department (1) 4. University of Texas, Nettie Lee Benson Latin American Collection (1) 5. City University of New York (1) 6. Southern University (1)
<p>Research Groups</p> <ol style="list-style-type: none"> 1. Intercultural Development Research Center (1) 2. Tomas Rivera Center (1)
<p>School Book Publisher</p> <ol style="list-style-type: none"> 1. Houghton Mifflin Company (1)

<p>Advocacy Group</p> <p>1. National Association for Hispanic Elderly (1)</p>
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AGENCIES AND ORGANIZATIONS (Number of Individuals Contacted)
<p>Magazines</p> <p>1. Los Angeles East Magazine (1)</p> <p>2. Editorial América (1)</p> <p>3. Reader's Digest (1)</p>
<p>Newspapers</p> <p>1. La Voz Católica (1)</p> <p>2. Noticias en Español (1)</p> <p>3. 20 de Mayo (1)</p> <p>4. El Extra (1)</p> <p>5. El Sol de Tejas (1)</p> <p>6. La Prensa News (1)</p>
<p>Community Based Organizations</p> <p>1. Lancaster (PA) Center for Literacy (1)</p> <p>2. Texas Council of La Raza (1)</p> <p>3. National Council of La Raza (1)</p>
<p>Translation Services</p> <p>1. Globalink (1)</p> <p>2. Pan American Health Organization (1)</p>
<p>Software Companies</p> <p>1. Globalink (1) (same individual in "Translation Services")</p> <p>2. Pan American Health Organization (1) (same individual in "Translation Services")</p> <p>3. Novall (1)</p>

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APPENDIX E

MAJOR CONTRIBUTORS TO THIS REPORT

This evaluation report was prepared by the Office of Audit in Dallas, under the direction of Scott Patterson, Director, Evaluations and Technical Services. Project staff included:

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