



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

*Audit Report*

Benefits Payable to Widow(er)s  
Subject to Government Pension  
Offset Had They Delayed Their  
Application

*A-09-19-50791 | November 2020*



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

**MEMORANDUM**

**Date:** November 19, 2020

**Refer To:**

**To:** The Commissioner

**From:** Inspector General

**Subject:** Benefits Payable to Widow(er)s Subject to Government Pension Offset Had They Delayed Their Application (A-09-19-50791)

The attached final report presents the results of the Office of Audit's review. The objective was to determine whether the Social Security Administration had adequately informed widow(er)s who were subject to government pension offset of their option to delay their application for widow(er)s benefits.

If you wish to discuss the final report, please call me or have your staff contact Michelle L. Anderson, Assistant Inspector General for Audit, at 410-965-9700.

A handwritten signature in cursive script that reads 'Gail S. Ennis'.

Gail S. Ennis

Attachment

# Benefits Payable to Widow(er)s Subject to Government Pension Offset Had They Delayed Their Application

## A-09-19-50791



November 2020

Office of Audit Report Summary

### Objective

To determine whether the Social Security Administration (SSA) had adequately informed widow(er)s who were subject to government pension offset (GPO) of their option to delay their application for widow(er)s benefits.

### Background

Generally, Social Security benefits are reduced for widow(er)s who receive a pension based on their own work for a Federal, State, or local government that was not covered by Social Security. The reduction, known as GPO, is equal to two-thirds of the government pension.

When individuals apply for widow(er)'s benefits, SSA must determine whether they are receiving, or expect to receive, a pension based on earnings not covered by Social Security. In addition, SSA employees must explain the advantages and disadvantages of filing an application so claimants can make an informed filing decision. Widow(er)s have the option to delay their application up to their full retirement age (FRA) to increase their monthly benefit amount.

We identified 21,532 widow(er)s whose benefits SSA had not paid because two-thirds of their government pension exceeded their widow(er)'s monthly benefit amount.

### Findings

SSA did not always inform widow(er)s who were subject to GPO of their option to delay, or withdraw and resubmit, their application for widow(er)'s benefits. Based on our random sample, we estimate 1,938 widow(er)s would have been eligible for approximately \$12.8 million had they delayed their widow(er)'s application up to FRA. We also estimate 1,615 widow(er)s could receive approximately \$42.6 million in additional benefits over their remaining life expectancies.

We found insufficient evidence that SSA had properly informed the claimants of their option to delay, or withdraw and resubmit, their application for widow(er)'s benefits, as required. In addition, SSA did not have systems controls in place to alert its employees when they should inform widow(er)s of the option to delay their application for widow(er)'s benefits.

### Recommendations

We recommend that SSA:

1. Notify the 18 beneficiaries identified in our audit of their option to withdraw their application, if eligible, and reapply for widow(er)'s benefits.
2. Evaluate the results for the 18 beneficiaries in our sample and take appropriate action to notify the remaining population of beneficiaries of their option to withdraw their application and reapply for widow(er)'s benefits.
3. Remind employees to discuss the advantages of delaying an application when widow(er) claimants are subject to GPO and document the facts and decisions in accordance with SSA policy.
4. Ensure it informs widow(er) beneficiaries of their option to delay, or withdraw and resubmit, their application for widow(er)'s benefits.

SSA agreed with our recommendations.

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## **ABBREVIATIONS**

C.F.R.	Code of Federal Regulations
FRA	Full Retirement Age
GPO	Government Pension Offset
MBR	Master Beneficiary Record
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
U.S.C.	United States Code

## OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) had adequately informed widow(er)s who were subject to government pension offset (GPO) of their option to delay their application for widow(er)s benefits.

## BACKGROUND

The *Social Security Act* provides for monthly benefits to retired and disabled workers, including their dependents and survivors.<sup>1</sup> Individuals may be entitled to widow(er)'s benefits if they were married to the deceased worker, have attained age 60 (or age 50 if disabled), and have filed an application. SSA employees determine a claimant's eligibility for all benefits, explain the benefit options, and discuss factors that affect the claimant's decision.<sup>2</sup>

Generally, Social Security benefits are reduced for widow(er)s who receive a pension based on their own work for a Federal, State, or local government that was not covered by Social Security.<sup>3</sup> The reduction, known as the government pension offset, is equal to two-thirds of the government pension.<sup>4</sup> When individuals apply for widow(er)'s benefits, SSA must determine whether they are receiving, or expect to receive, a pension based on earnings not covered by Social Security.<sup>5</sup> To identify beneficiaries who may be subject to GPO, SSA primarily relies on applicants to report entitlement to current or future pensions from employment not covered by Social Security.<sup>6</sup> For retired Federal employees, SSA receives monthly pension notifications from the Office of Personnel Management.<sup>7</sup>

The decision to file belongs solely to the claimant. Therefore, SSA employees must explain the advantages and disadvantages of filing an application so claimants can make an informed filing decision. SSA employees must discuss and document any filing decisions that may adversely affect the claimant's current or future benefits, such as filing an application for widow(er)'s benefits when it is in his/her best interest to delay the application. If a claimant applies for benefits even though it may adversely affect future benefits, SSA employees must document the facts and decision in its automated system.<sup>8</sup>

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<sup>1</sup> *Social Security Act*, 42 U.S.C. §§ 401-402 (govinfo.gov 2018).

<sup>2</sup> SSA, *POMS*, GN 00201.005, C (March 26, 2019).

<sup>3</sup> *Social Security Act*, 42 U.S.C. § 402(k)(5) (govinfo.gov 2018); 20 C.F.R. § 404.408a (govinfo.gov 2019).

<sup>4</sup> *Social Security Act*, 42 U.S.C. § 402(k)(5) (govinfo.gov 2018); 20 C.F.R. § 404.408a(d) (govinfo.gov 2019); SSA, *POMS*, GN 02608.100 (June 21, 2016).

<sup>5</sup> SSA, *POMS*, GN 00205.160, E (November 10, 2011).

<sup>6</sup> SSA, *POMS*, GN 02608.200, A (January 7, 2020).

<sup>7</sup> SSA, *POMS*, GN 02608.301 (March 8, 2013); SSA, *POMS*, RS 00605.374 (August 7, 2013).

<sup>8</sup> SSA, *POMS*, GN 00201.005, C (March 26, 2019).

Widow(er)s have the option to delay their application up to their full retirement age (FRA)<sup>9</sup> to increase their monthly benefit amount. Widow(er)s also have the option to withdraw their application for widow(er)'s benefits and reapply for benefits up to FRA to increase their monthly benefit amount as long as they repay any benefits they received. SSA employees must discuss withdrawing an application when the entitlement may adversely affect the claimant.<sup>10</sup> SSA's systems do not generate alerts to remind employees when they should inform widow(er)s of the option to delay their application for benefits.

For example, if a beneficiary receives a \$1,500 government pension and is entitled to a \$900 reduced widower's monthly benefit at age 60, SSA imposes GPO and withholds up to \$1,000 ( $2/3 \times \$1,500$ ) from the widower. Therefore, the widower would not receive the \$900 payment. Had the widower delayed filing the application, he would have been eligible for a \$1,200 monthly benefit at FRA and receive a \$200 payment. Although the beneficiary applied for widower's benefits before FRA, he could withdraw his application and reapply for widower's benefits at FRA to receive a \$200 monthly benefit.<sup>11</sup>

We identified 21,532 beneficiaries who were entitled to widow(er)'s benefits before FRA and in suspended pay status because two-thirds of their government pension exceeded their monthly benefit amount. Had SSA informed them of the option to delay their widow(er)'s application, they may have been eligible for benefits at a later filing date. From this population, we reviewed a random sample of 200 beneficiaries and sent letters to obtain pension information from 50 beneficiaries and 16 pension providers (see Appendix B).

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<sup>9</sup> FRA is age 65 for people born before January 2, 1938. FRA increases gradually until it reaches age 67 for people born January 2, 1960 or later. *Social Security Act*, 42 U.S.C. § 416(l) (govinfo.gov 2018); SSA, *POMS*, RS 00615.003 (May 21, 2004).

<sup>10</sup> SSA, *POMS*, GN 00206.001, A and B (July 31, 2017); *See also* SSA, *POMS*, GN 00206.005, A (January 11, 2019) and GN 00206.014, A (July 31, 2017).

<sup>11</sup> A widow(er) may withdraw his/her application after FRA and reapply to receive up to 6 months of retroactive benefits. SSA, *POMS*, GN 00204.030 (December 04, 2017).

## RESULTS OF REVIEW

SSA employees did not always inform widow(er)s who are subject to GPO of their option to delay, or withdraw and resubmit, their application for widow(er)'s benefits. Based on our random sample, we estimate:

- 1,938 widow(er)s would have been eligible for approximately \$12.8 million had they delayed their widow(er)'s application up to FRA.<sup>12</sup>
- 1,615 widow(er)s could receive approximately \$42.6 million in additional benefits over their remaining life expectancies.<sup>13</sup> On average, each widow(er) could receive an additional \$26,400 in benefits (see Appendix C).

When these claimants applied for benefits, SSA determined they were not eligible because two-thirds of their government pension exceeded their widow(er)'s monthly benefit amount. SSA should have informed them of the option to delay their widow(er)'s application up to FRA or withdraw their application and reapply for benefits later to receive a monthly benefit amount. We found insufficient evidence that SSA had properly informed the claimants of their option to delay, or withdraw and resubmit, their application for widow(er)'s benefits, as required by SSA policy. In addition, SSA did not have systems controls in place to alert its employees when they should inform widow(er)s of the option to delay their application for widow(er)'s benefits.

### Sample Results

Of the 200 beneficiaries in our sample, 18 (9 percent) would have been eligible for a monthly benefit amount had they delayed their widow(er) application. These claimants were subject to GPO and ineligible for benefits when they applied because two-thirds of their government pension exceeded their reduced widow(er)'s benefits. Had SSA employees properly informed the claimants of their filing options, they could have delayed their widow(er) application up to FRA to increase their monthly benefit amount. Instead, SSA awarded the widow(er)'s benefits—even though it never made any payments—and did not document the filing decisions in its automated system. Of the 18 beneficiaries, 16 were older than FRA as of August 2020, and SSA could have paid them \$117,988. The remaining two beneficiaries were younger than FRA and eligible for \$607 in monthly benefits had they delayed their widow(er) application up to August 2020. These two widow(er)s have the option to delay their application up to FRA to increase their monthly benefit amount.

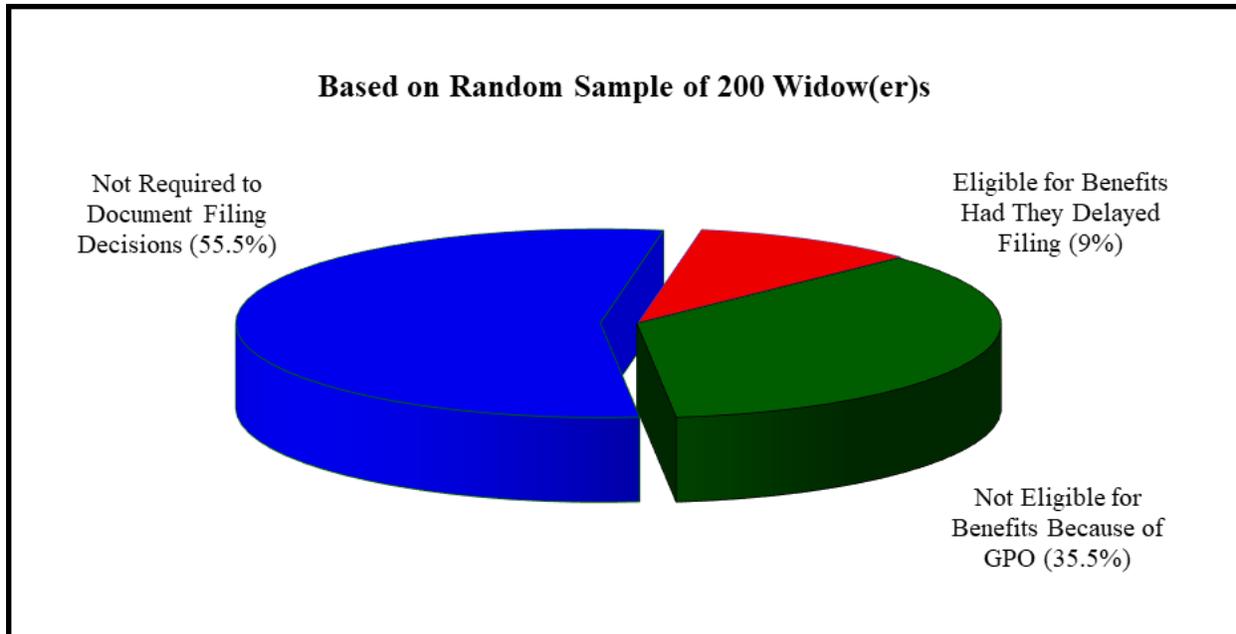
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<sup>12</sup> Beneficiaries are eligible to receive the highest widow(er)'s benefit at FRA; however, they may apply for higher widow(er)'s benefits before FRA.

<sup>13</sup> We used the life-expectancy rates published by the Department of Health and Human Services, Centers for Disease Control and Prevention, *United States Life Tables, 2017*, vol. 68, no. 7, pp. 12 through 15 (June 24, 2019).

In addition, SSA did not inform 71 (35.5 percent) beneficiaries of the option to delay their widow(er)'s application and document the filing decisions in its automated system. However, we determined that, because of GPO, none of these widow(er)s would have been eligible for a payment had they delayed their application up to FRA. SSA was not required to document the filing decisions for the remaining 111 (55.5 percent) beneficiaries. Of these, 83 received 1 or more payments after they applied for widow(er)'s benefits, and 28 were not eligible for higher benefits had they delayed their application. Figure 1 summarizes the results of our review.

**Figure 1: Widow(er)s Eligible for Benefits Had They Delayed Filing Their Application**



## Widow(er)s Eligible for Benefits Had They Delayed Filing Their Application

We mailed letters to 50 beneficiaries and 16 pension providers to obtain updated information because, according to SSA's systems, the beneficiaries would have been eligible for benefits had they delayed their widow(er)'s application. Based on their responses, we found 18 beneficiaries could have received a payment at FRA because their widow(er)'s benefits exceeded two-thirds of their government pension had they delayed their application. All 18 beneficiaries applied for widow(er)'s benefits even though no benefits were payable. When the claimants applied for widow(er)'s benefits, SSA should have provided their monthly benefit amount, including the amount at FRA,<sup>14</sup> and informed the widow(er)s of the option to delay their application—or

<sup>14</sup> SSA is required to review the claimant's information to determine his/her eligibility options for filing decisions. SSA should provide the claimant with the monthly benefit amount for the earliest possible month of entitlement, at FRA, age 70, and any other months requested by the claimant. SSA, *POMS*, GN 00204.039 (July 18, 2014); See also SSA, *POMS*, GN 00201.005 (March 26, 2019).

documented their filing decisions. SSA's automated system does not generate an alert to notify employees to document the filing decision.

Of the 18 beneficiaries, we noted that 12 received teacher's pensions or lump-sum payments from their pensions that provided little or no cost-of-living adjustment. The monthly payments from these pensions generally did not increase. Since SSA provides for annual increases in Social Security benefits based on a cost-of-living adjustment,<sup>15</sup> widow(er)s who are subject to GPO may become eligible for benefits at FRA even if they were not eligible when they applied for reduced benefits. Although the remaining six beneficiaries had government pensions with cost-of-living adjustments, they were still eligible for widow(er)'s benefits at FRA because delaying their application increased their monthly benefit amount.

In addition, we asked the beneficiaries whether SSA had informed them of their filing options. Of the 50 beneficiaries in our sample, 27 responded to our questions. We found 12 widow(er)s stated SSA did not explain the option to delay their application to receive a higher payment while 13 did not remember. In addition, 13 widow(er)s stated SSA did not explain the option to withdraw and resubmit their application to receive a higher payment while 14 did not remember. Another 10 widow(er)s stated they did not understand that applying for widow(er)'s benefits before FRA would result in no payments, and 11 were not sure they understood the financial impact of applying for such benefits. Finally, 20 widow(er)s stated they would prefer that SSA contact them at FRA to determine whether they were eligible for a payment, and 7 were not sure they wanted SSA to contact them (see Appendix A). SSA policy does not require that employees follow up with widow(er)s who applied for reduced benefits and were subject to GPO to determine whether they may be eligible for benefits had they delayed their application up to FRA.

For example, in April 2011, an individual attained age 60 and applied for reduced widow's benefits. She was eligible for a \$704 widow's monthly benefit and received a \$1,514 monthly pension from the Puerto Rico Teacher's Retirement Fund. Since the widow was subject to GPO, SSA withheld up to \$1,009 in benefits and did not pay the widow. We did not find evidence that SSA employees informed the widow about her option to delay her widow's application up to FRA to increase her benefits. In March 2017, the widow attained FRA and, although her pension had not increased, her widow's monthly benefit would have increased to \$1,068. Had the widow delayed her application, she would have received \$3,884 from March 2017 to August 2020. Instead, SSA did not pay the widow any benefits. Had SSA notified the widow of her option to withdraw her application and reapply for widow's benefits, she would have

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<sup>15</sup> The cost-of-living adjustment is effective in December and due whenever the Consumer Price Index rises. *Social Security Act*, 42 U.S.C. § 415(i) (govinfo.gov 2018); SSA, *POMS*, RS 00601.120 (November 1, 2019).

received a \$128 monthly benefit,<sup>16</sup> beginning in August 2020, and an additional \$26,624 over her remaining life expectancy.<sup>17</sup>

## CONCLUSIONS

SSA did not always inform widow(er)s who are subject to GPO of their option to delay, or withdraw and resubmit, their application for widow(er)'s benefits. We estimate 1,938 widow(er)s would have been eligible for approximately \$12.8 million had they delayed their widow(er)'s application up to FRA.<sup>18</sup> We also estimate 1,615 widow(er)s could receive approximately \$42.6 million in additional benefits over their remaining life expectancies.<sup>19</sup> On average, each widow(er) could receive an additional \$26,400 in benefits (see Appendix C).

We found insufficient evidence that SSA had properly informed the claimants of their option to delay, or withdraw and resubmit, their application for widow(er)'s benefits, as required. In addition, SSA did not have systems controls in place to alert its employees when they should inform widow(er)s of the option to delay their application for widow(er)'s benefits.

## RECOMMENDATIONS

We recommend that SSA:

1. Notify the 18 beneficiaries identified in our audit of their option to withdraw their application, if eligible, and reapply for widow(er)'s benefits.
2. Evaluate the results for the 18 beneficiaries in our sample and take appropriate action to notify the remaining population of beneficiaries of their option to withdraw their application and reapply for widow(er)'s benefits.
3. Remind employees to discuss the advantages of delaying an application when widow(er) claimants are subject to GPO and document the facts and decisions in accordance with SSA policy.
4. Ensure it informs widow(er) beneficiaries of their option to delay, or withdraw and resubmit, their application for widow(er)'s benefits.

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<sup>16</sup> In addition, the widow may receive \$768 of retroactive benefits from February to July 2020. *See SSA, POMS, GN 00204.030* (December 04, 2017).

<sup>17</sup> The \$26,624 does not include any cost-of-living adjustments. Based on a 20-year average annual 2.15 percent cost-of-living adjustment, the widow would receive an additional \$51,022 over her remaining life expectancy. *See Social Security Act, 42 U.S.C. § 415(i)* (govinfo.gov 2018); *SSA, POMS, RS 00601.120* (November 1, 2019).

<sup>18</sup> Beneficiaries are eligible to receive the highest widow(er)'s benefit at FRA; however, they may apply for higher widow(er)'s benefits before FRA.

<sup>19</sup> We used the life-expectancy rates published by the Department of Health and Human Services, Centers for Disease Control and Prevention, *United States Life Tables, 2017*, vol. 68, no. 7, pp. 12 through 15 (June 24, 2019).

## AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix D.



Michelle L. Anderson  
Assistant Inspector General for Audit

# *APPENDICES*

## Appendix A – SUMMARY OF WIDOW(ER)’S RESPONSES

For 50 of the 200 beneficiaries in our sample, we mailed letters to request updated pension information from the widow(er)s and determine whether the Social Security Administration (SSA) had informed them of their filing options. We also mailed letters to 16 pension providers who administered the government pensions for these widow(er)s. If the beneficiaries or pension providers did not respond to our letters, we attempted to follow up with them by telephone. We obtained updated pension information for 43 of the 50 beneficiaries. The remaining seven beneficiaries did not respond to our letters and telephone calls. Of the 50 beneficiaries, 27 responded to our questions about whether SSA had informed them of their filing options.

SSA did not always inform the claimants of their option to delay, or withdraw and resubmit, their application for widow(er)’s benefits. Specifically, 12 widow(er)s stated SSA did not explain the option to delay their application to receive a higher payment while 13 did not remember. In addition, 13 widow(er)s stated SSA did not explain the option to withdraw their application and reapply later to receive a higher payment while 14 did not remember. Another 10 widow(er)s stated they did not understand that applying for widow(er)’s benefits before full retirement age (FRA) would result in no payments, and 11 were not sure they understood the financial impact of applying for such benefits. Finally, 20 widow(er)s stated they would prefer that SSA contact them at FRA to determine whether they were eligible for a payment, and 7 were not sure they wanted SSA to contact them.

The following table provides a summary of the widow(er)’s responses to our questions.

**Table A–1: Widow(er)’s Responses to Questions About Filing Options**

Questions	Yes	No	Uncertain
Did SSA explain widow(er)’s benefits are permanently reduced if you elected to apply for benefits before your FRA and delaying your application may allow you to receive a higher payment?	2	12	13
Did SSA explain the government pension offset provision, which allows SSA to withhold your widow(er)’s benefits up to two-thirds of the amount you receive from your pension?	12	4	11
Did you understand that electing to receive reduced widow(er)’s benefits would result in \$0 and delaying may result in a payment?	6	10	11
Did SSA explain that you could withdraw your application and reapply up to FRA to increase the amount of widow(er)’s benefits—potentially allowing you to receive a payment—as long as you repaid any widow(er)’s benefits you received?	0	13	14
Did you feel you were capable of making an informed decision about when to apply for benefits?	6	10	11
Would you prefer that SSA contact you at FRA to determine whether you would be eligible to receive a monthly benefit?	20	0	7

## Appendix B – SCOPE AND METHODOLOGY

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From the Social Security Administration's (SSA) Master Beneficiary Record (MBR),<sup>1</sup> we obtained a data extract of 21,532 beneficiaries who, as of April 2019, were entitled to widow(er)'s benefits before their full retirement age (FRA) and in suspended pay status because two-thirds of their government pension exceeded their monthly benefit amount. Had SSA informed them of the option to delay their widow(er)'s application, they may have been eligible for benefits at a later filing date. From this population, we selected a random sample of 200 beneficiaries for review.

To accomplish our objective, we

- reviewed the applicable sections of the *Social Security Act* and SSA's Program Operations Manual System;
- interviewed SSA employees from the Offices of Operations and Retirement and Disability Policy;
- reviewed queries from SSA's MBR, Modernized Claims System, and Claims File User Interface;
- contacted 50 beneficiaries and 16 pension providers, via letter and telephone, to obtain updated pension information and determine whether SSA had informed the beneficiaries of their filing options; and
- determined whether beneficiaries were eligible for benefits had they delayed applying for widow(er)'s benefits up to FRA.

We determined whether the computer-processed data from the MBR were sufficiently reliable for our intended use. We conducted tests to determine the completeness and accuracy of the data. These tests allowed us to assess the reliability of the data and achieve our audit objective.

We assessed the significance of internal controls necessary to satisfy the audit objective. We determined that internal controls were not significant to the audit objective; therefore, we did not assess the design, implementation, or operating effectiveness of internal controls.

We conducted audit work in Richmond, California, and Baltimore, Maryland, between October 2019 and August 2020. The entity audited was the Office of Operations under the Office of the Deputy Commissioner for Operations.

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<sup>1</sup> The MBR contains records of all current and previously entitled Old-Age, Survivors and Disability Insurance beneficiaries. SSA establishes the record when it receives an initial claims action.

We conducted this performance 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 our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## Appendix C – SAMPLING METHODOLOGY AND RESULTS

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We obtained a data extract from the Social Security Administration’s (SSA) Master Beneficiary Record of 21,532 beneficiaries who, as of April 2019, were entitled to widow(er)’s benefits before their full retirement age (FRA) and in suspended pay status because two-thirds of their government pension exceeded their monthly benefit amount. Had SSA informed them of the option to delay their widow(er)’s application, they may have been eligible for benefits at a later filing date. From this population, we selected a random sample of 200 beneficiaries for review. We determined whether beneficiaries were eligible for benefits had they delayed applying for widow(er)’s benefits up to FRA.

Of the 200 beneficiaries in our sample, 18 were eligible for a monthly benefit amount had they delayed their widow(er) application. These claimants were entitled to widow(er)’s benefits that exceeded two-thirds of their government pension when they applied. Had SSA employees properly informed the claimants of their filing options, they could have delayed their widow(er) application up to FRA to increase their monthly benefit amount. Of the 18 beneficiaries, 16 were over FRA as of August 2020, and SSA could have paid them \$117,988. The remaining two widow(er)s were under FRA and eligible for \$607 in monthly benefits as of August 2020. These two widow(er)s have the option to delay their application up to FRA to increase their monthly benefit amount.

Projecting these results to our population of 21,532 beneficiaries, we estimate 1,938 widow(er)s would have been eligible for approximately \$12.8 million had they delayed their widow(er)’s application up to FRA. In addition, we estimate 1,615 widow(er)s could receive approximately \$42.6 million in additional benefits over their remaining life expectancies.<sup>1</sup> On average, each widow(er) could receive an additional \$26,400 in benefits.

The following tables provide the details of our sample results and statistical projections.

**Table C–1: Population and Sample Size**

Description	Beneficiaries
Population Size	21,532
Sample Size	200

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<sup>1</sup> We used the life-expectancy rates published by the Department of Health and Human Services, Centers for Disease Control and Prevention, *United States Life Tables, 2017*, vol. 68, no. 7, pp. 12 through 15 (June 24, 2019).

**Table C–2: Benefits Payable to Widow(er)s Who Delayed Their Application**

Description	Beneficiaries	Payments
Sample Results	18	\$118,595
Point Estimate	1,938	\$12,767,916
Projection – Lower Limit	1,273	\$4,007,485
Projection – Upper Limit	2,806	\$21,528,348

**Note:** All statistical projections are at the 90 percent confidence level.

**Table C–3: Additional Benefits Payable to Widow(er)s over Their Life Expectancy**

Description	Beneficiaries	Payments
Sample Results	15 <sup>2</sup>	\$395,927
Point Estimate	1,615	\$42,625,501
Projection – Lower Limit	1,010	\$18,092,589
Projection – Upper Limit	2,432	\$67,158,412

**Note:** All statistical projections are at the 90 percent confidence level.

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<sup>2</sup> Of the 18 beneficiaries, 3 would no longer be eligible for widow(er)'s benefits in August 2020 had they delayed their application.

## Appendix D– AGENCY COMMENTS

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### SOCIAL SECURITY

#### MEMORANDUM

Date: November 5, 2020

Refer To: TQA-1

To: Gail S. Ennis  
Inspector General

*Stephanie Hall*

From: Stephanie Hall  
Chief of Staff

Subject: Office of the Inspector General Draft Report “Benefits Payable to Widow(er)s Subject to Government Pension Offset Had They Delayed Their Application” (A-09-19-50791) (Audit No. 22019064) - INFORMATION

Thank you for the opportunity to review the draft report. We agree with the recommendations.

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



**Mission:**

The Social Security Office of the Inspector General (OIG) serves the public through independent oversight of SSA’s programs and operations.

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