Audit Report

Retirement Beneficiaries Potentially Eligible for Widow(er)’s Benefits
MEMORANDUM

Date: June 9, 2020
To: The Commissioner
From: Inspector General
Subject: Retirement Beneficiaries Potentially Eligible for Widow(er)’s Benefits (A-13-13-23109)

The attached final report presents the results of the Office of Audit’s review. Our objective was to determine whether there were individuals receiving retirement benefits who may have been eligible for, but not receiving, higher widow(er)’s benefits.

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

Gail S. Ennis

Attachment
Retirement Beneficiaries Potentially Eligible for Widow(er)’s Benefits
A-13-13-23109

June 2020

Objective
To determine whether there were individuals receiving retirement benefits who may have been eligible for, but not receiving, higher widow(er)’s benefits.

Background
The Social Security Administration (SSA) administers the Old-Age, Survivors and Disability Insurance program to provide monthly benefits to retired and disabled workers, including their dependents and survivors. An individual can be dually entitled to retirement benefits based on his/her own work history and widow(er)’s benefits based on the earnings of his/her deceased spouse.

Generally, an individual may be entitled to widow(er)’s benefits if he/she (a) was married to a wage earner who was fully insured when he or she died; (b) attained age 60 (or age 50 if disabled); (c) is unmarried (unless the marriage can be disregarded); (d) filed an application for widow(er)’s benefits; and (e) is not entitled to a retirement insurance benefit that equals or exceeds the deceased wage earner’s primary insurance amount.

We identified 30,768 individuals receiving retirement benefits as of January 2019 who may be eligible for additional widow(er)’s benefits. From this population, we selected a random sample of 100 beneficiaries for review.

Findings
Of the 100 retirement beneficiaries sampled, 69 were eligible for higher widow(er)’s benefits. Of these 69 widow(er)s, there were

- 20 who filed claims and whom SSA determined were entitled to widow(er)’s benefits before the start of our audit and
- 49 who were eligible for approximately $630,000 in widow(er)’s benefits.

The remaining 31 retirement beneficiaries were not due widow(er)’s benefits.

This occurred because SSA (1) employees did not always assess and take action when cases were alerted for possible payment increases, and/or (2) did not have processes to detect beneficiaries potentially eligible for higher widow(er)s benefits.

Based on the results of our review, we estimate 15,076 retirement beneficiaries were eligible for $193.8 million in widow(er)’s benefits as of September 2019. Further, we estimate 12,615 of these beneficiaries could lose an additional $530.9 million in widow(er)’s benefits over their lifetimes.

Recommendations
We made five recommendations for SSA to act on the cases we identified as potentially eligible for higher widow(er)s benefits, evaluate improvements needed for its quality reviews, clarify its instructions, and develop additional processes to identify retirement beneficiaries who are potentially eligible for widow(er)’s benefits. SSA agreed with our recommendations.
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ABBREVIATIONS

Form SSA-1724 Claim for Amounts Due in the Case of a Deceased Beneficiary
Form SSA-721 Statement of Death by Funeral Director
OASDI Old-Age, Survivors and Disability Insurance
OIG Office of the Inspector General
POMS Program Operations Manual System
SSA Social Security Administration
OBJECTIVE

Our objective was to determine whether there were individuals receiving retirement benefits who may have been eligible for, but not receiving, higher widow(er)’s benefits.

BACKGROUND

SSA administers the Old-Age, Survivors and Disability Insurance (OASDI) program to provide monthly benefits to retired and disabled workers, including their dependents and survivors. An individual may be entitled to more than one benefit at the same time. For example, an individual can be dually entitled to retirement benefits based on his/her own earnings and widow(er)’s benefits based on the earnings of his/her deceased spouse. Generally, an individual may be entitled to widow(er)’s benefits if he/she

- was married to a wage earner who died fully insured;
- attained age 60 (or age 50 if disabled);
- is unmarried (unless the marriage can be disregarded);
- filed an application for widow(er)’s benefits; and
- is not entitled to a retirement insurance benefit that equals or exceeds the deceased wage earner’s primary insurance amount.

SSA receives and processes reports of death from a variety of sources. These reports alert the Agency to pursue surviving spouses and children claims for benefits. SSA policy instructs staff to develop leads for these surviving claims. For OASDI benefits, a lead is a written or oral indication of potential entitlement where there is no intent to file by the party who furnishes the

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3 To meet the relationship requirement, the claimant must have been the legal, putative, or deemed spouse of the deceased wage earner and must have been married at least 9 months before the wage earner’s death, unless an exception is met. For a surviving divorced spouse, the divorce must be final and the claimant must be the legal or putative spouse of the deceased wage earner for at least 10 years (20 years for benefits before January 1979) before the divorce became final. For benefits payable January 1991 and later, a deemed marriage is acceptable. SSA, POMS, RS 00207.001, A (August 8, 2011).
4 Under certain conditions, the remarriage may be disregarded, i.e., deemed not to exist. The remarriage’s effect on entitlement depends on the claimant’s age, whether the claimant is entitled at the time of marriage, and the type of claimant. For example, SSA will disregard the remarriage of a claimant applying for benefits as a widow(er) if the remarriage occurred after age 60. SSA, POMS, RS 00207.003, A (September 2, 2014).
5 SSA, POMS, RS 00207.001, A (August 8, 2011).
6 SSA, POMS, GN 02602.050, A (September 3, 2019).
7 SSA, POMS, GN 02602.050, F (September 3, 2019).
lead information. According to Agency policy, all leads must be disposed of promptly to prevent a loss of benefits. Staff should contact the individual to determine whether he/she wishes to file and document the outcome. A lead is disposed of

- after determining from SSA records that no current or future entitlement exists;
- after contacting the proper applicant and determining that he/she does not wish to file;
- after taking an application;
- when staff is unable to contact the proper applicant; or
- when a protective filing is established.

We identified 30,768 individuals receiving retirement benefits as of January 2019 who may be eligible for additional widow(er)’s benefits. From this population, we selected a random sample of 100 beneficiaries for review. See Appendix A for a discussion of our scope and methodology, and Appendix B for our sampling methodology and results.

**RESULTS OF REVIEW**

We identified individuals receiving retirement benefits who were eligible for higher benefits as widow(er)s. This occurred because SSA (1) did not always develop and dispose of survivor leads and/or (2) does not have processes to detect beneficiaries potentially eligible for higher widow(er)s benefits. Based on the results of our review, we estimate—of the 30,768 retirement beneficiaries in our population—15,076 were eligible for an additional $193.8 million in widow(er)’s benefits as of September 2019. Further, if these individuals do not file for benefits, we estimate 12,615 of these beneficiaries could lose an additional $530.9 million in widow(er)’s benefits over their lifetimes.

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8 SSA, *POMS*, GN 00202.001, B.1 (October 2, 2001).
10 A proper applicant is anyone who has the right to sign a valid application on behalf of himself/herself or on behalf of the claimant. SSA, *POMS*, GN 00204.003, A (December 1, 1998).
11 SSA, *POMS*, GN 00202.020, G (September 8, 2010). A protective filing for OASDI benefits is a written indication of intent to file for benefits received by SSA. SSA, *POMS*, GN 00204.010, B (November 17, 2008).
12 In June 2019, we provided SSA a list of the 100 beneficiaries selected, per the Agency’s request.
13 Our population included 30,768 retirement beneficiaries. We sampled 100 beneficiaries for review. We replaced three of the beneficiaries initially selected because they died before the start of our review. As a result, we did not review 30,665 beneficiaries in our population during this audit.
Sample Results

Of the 100 retirement beneficiaries we sampled, 69 were eligible for higher widow(er)’s benefits. This included:

- 20 who filed claims and whom SSA determined were entitled to widow(er)’s benefits before the start of our audit; and
- 49 who were eligible for approximately $630,000 in widow(er)’s benefits.

The remaining 31 retirement beneficiaries were not due widow(er)’s benefits. This included:

- 18 who were not the spouses of the deceased wage earners;
- 5 who restricted their applications to exclude widow(er) benefits; and
- 8 who would likely be subject to Government Pension Offset, which would reduce their benefit amounts, if the beneficiaries applied for widow(er)’s benefits.

From January 2011 to September 2019, these 49 beneficiaries could have received approximately $630,000 in additional benefits. If the individuals do not apply for benefits, they could lose an additional $1.7 million in widow(er)’s benefits over their lifetimes. As of September 2019, 3 of the 49 beneficiaries had died. In addition, SSA had notified two retirement beneficiaries they were potentially eligible, and needed to file applications for widow(er)’s benefits. Further, three retirement beneficiaries became entitled to widow(er)’s benefits, and SSA paid them over $15,000 in underpayments. SSA had not notified the remaining 41 retirement beneficiaries they were potentially eligible for widow(er)’s benefits.

Of the 49 beneficiaries we identified as eligible for widow(er)’s benefits, SSA staff confirmed the Agency “missed” 2 beneficiaries’ initial entitlement to benefits. For example, one beneficiary filed for retirement benefits after her spouse died, but the Agency did not recognize she was also entitled to widow’s benefits. Additionally, SSA acknowledged it received post-
entitlement leads that indicated four retirement beneficiaries were the widow(er)s of deceased wage earners; however, it did not take an application to establish their entitlement to widow(er)’s benefits.

**Survivor Leads**

SSA did not always develop and dispose of survivor leads. For example, when SSA receives a Form SSA-721, *Statement of Death by Funeral Director*, that identifies a survivor of the deceased wage earner, the Agency considers the Form a lead.\(^{19}\) SSA staff must develop and dispose of the lead, as required by policy.\(^{20}\) SSA received Forms SSA-721 for 13 of the 49 retirement beneficiaries we identified who were eligible for widow(er)’s benefits. Based on available information, we confirmed surviving spouses were named on 5 of the 13 Forms.\(^{21}\) However, SSA initiated action for only one beneficiary. After SSA received the funeral home notice, it sent the beneficiary a letter regarding the payment of a lump-sum death benefit to a qualified survivor of the deceased wage earner. Nonetheless, SSA did not notify the beneficiary of her potential eligibility for widow’s benefits.

Further, when a wage earner dies and there is an underpayment greater than $50 on the record, SSA will review beneficiary records and claims files to identify a survivor to receive the underpayment.\(^{22}\) SSA may contact the surviving spouse or family of the deceased beneficiary to complete a Form SSA-1724—*Claim for Amounts Due in the Case of a Deceased Beneficiary*, which could serve as a lead in rare cases. Although SSA’s policy for processing leads does not list Form SSA-1724, SSA staff reported employees could use the Form as a potential lead in rare cases. Our work demonstrated the usefulness of using the Form as a lead. Of the 49 beneficiaries, SSA received Forms SSA-1724 that identified 7 as surviving spouses. SSA established protective filings for two beneficiaries\(^{23}\) and sent a letter to one beneficiary regarding her potential eligibility for benefits. However, there was no evidence documented in SSA’s systems\(^{24}\) showing the Agency developed and disposed of the remaining four leads.

\(^{19}\) According to Agency policy, funeral directors in States that register deaths using the Electronic Death Registration are discouraged from sending SSA the Form SSA-721 because the Agency should already have records that are verified proofs of death. These funeral directors are encouraged to provide the public with the “fact sheet” portion of the Form SSA-721 that provides important information about who is eligible for benefits and how to apply for them. SSA, *POMS*, GN 00304.005, B (April 2, 2019).


\(^{21}\) Of the 13 Forms, we obtained 5 from SSA’s systems. For the remaining eight, SSA’s evidence screens indicated the Agency received the Forms from the funeral homes, but we were unable to retrieve them to determine whether the widow(er)s had been identified. SSA policy does not require employees to retain Form SSA-721 after they annotate the death information in the Agency’s systems. SSA, *POMS*, GN 00304.110, B.2 (March 2, 2016).

\(^{22}\) SSA, *POMS*, GN 02301.060, C (September 14, 2017).

\(^{23}\) SSA subsequently awarded these two widows lump-sum death payments, monthly widow’s benefits, and underpayments that covered the period from the wage earners’ deaths until the widows filed.

\(^{24}\) We use the term “SSA systems” to refer to SSA’s various records, systems, and databases.
We inquired whether the Agency conducted any monitoring or periodic reviews to identify retirement beneficiaries who may be due higher widow(er)s benefits or determine whether staff properly disposed of leads. SSA reported that its Office of Quality Review does not conduct periodic reviews that specifically target widow(er)s. However, it does review potential entitlements and leads as sources of error for all beneficiaries sampled—which includes widow(er)s claims—in its annual stewardship and triennial transaction accuracy reviews.

Existing Processes Related to Widow(er)’s Benefits

Although SSA had marriage and death information, it did not always identify and notify retirement beneficiaries of their potential eligibility to widow(er)’s benefits. SSA has processes in place to identify existing and previously entitled spouses who are eligible for widow(er)’s benefits. However, based on our review of SSA’s policies and procedures and information the Agency provided, we concluded SSA does not have processes to identify retirement beneficiaries who are potentially eligible for widow(er)’s benefits if those beneficiaries were not previously entitled to spouse’s benefits and have not filed for benefits.

For all 49 retirement beneficiaries we identified who were eligible for widow(er)’s benefits, SSA documented their marriages to the deceased wage earners in its systems. Specifically, the spouses were named on the OASDI applications and/or cross-referenced on the master beneficiary records. In addition, the wage earners’ deaths were posted on SSA’s Numident and had been verified. However, the Agency did not identify and notify the beneficiaries of their potential eligibility to widow(er)’s benefits.

SSA has various automated processes to detect spouses who are eligible for widow(er)’s benefits. For example, if a beneficiary is entitled to spouse’s benefits and the wage earner dies, the spouse’s benefit would be converted to a widow(er)’s benefit if he/she is: (1) at full retirement age or older; (2) under full retirement age with an entitled child-in-care; or (3) age 62 through the month before full retirement age when the wage earner dies. In addition, a wage earner’s death generates a “suspense” coding in situations involving a spouse who was dually entitled to retirement insurance and spousal benefits, and the spouse is under full retirement age when the wage earner dies. When a spouse reaches full retirement age, the Agency identifies and awards him/her benefits without requiring that he or she file an application. Also, there is

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25 In determining whether a claimant qualifies as a spouse or widow(er), SSA will assess the validity and status of the marriage.

26 The Numident is the Agency’s official source of death information. Of the 49 cases, 38 were verified by the electronic death registration; 1 was based on a preferred proof of death; 6 were reported from the Title II system and verified by the Agency; and 4 were reported by the state and had been proven.

27 The beneficiary’s benefits would be suspended for development of Form SSA-4111—Certificate of Election for Reduced Widow(er)’s or Surviving Divorced Spouse’s Benefits. This form is required to receive reduced benefits. Pending receipt of the certificate, the spouse is converted and placed in suspense status to identify him/her at full retirement age. SSA, POMS, RS 00207.005, C (April 14, 2009) and RS 00207.025 (December 18, 2018).

28 SSA, POMS, RS 00207.005, C (April 14, 2009).
no need to establish a lead for this action, as it is automatically established for beneficiaries who meet these conditions. Further, when there is a terminated spouse on a deceased wage earner’s record, SSA’s system will produce a potential widow(er) entitlement alert when the Agency inputs certain actions on the record. The 49 beneficiaries we identified were not entitled to spouse’s benefits on the deceased wage earners’ benefit records. Thus, SSA did not detect their potential eligibility to widow(er)’s benefits as part of its automated processes. However, 1 of the 49 beneficiaries was eligible for spouse’s benefits, but SSA did not take an application. Had SSA taken the application, the spouse’s benefits would have been automatically converted to widow’s benefits when the wage earner died.

Generally, when a claimant files an application, SSA staff must explore all benefits for which they are potentially entitled, including other types of benefits or entitlement on another record. Of the 49 beneficiaries we identified, 1 filed for retirement benefits after her spouse died, and the Agency failed to determine she was entitled to widow’s benefits. However, the remaining 48 filed their retirement claims before their spouses died and therefore were not eligible for widow(er)’s benefits when they applied. If a retirement beneficiary was unaware of these additional benefits and the requirement to file a subsequent application, it is likely the entitlement would go undetected, as SSA lacked processes to identify such beneficiaries.

The Agency performs an annual process to identify and notify beneficiaries receiving widow(er)’s benefits who are eligible for higher retirement benefits based on their own earnings. SSA should establish a similar process to identify and notify retirement beneficiaries who are potentially eligible for higher widow(er)’s benefits. The Agency indicated there would be limitations to automating the process because there are many variables in determining a widow(er)’s eligibility. However, we demonstrated through this audit that it is possible to identify these beneficiaries using data already in SSA’s systems.

**CONCLUSIONS**

If SSA staff fails to develop and dispose of survivor leads and does not establish additional controls, beneficiaries’ eligibility to widow(er)’s benefits may continue to go undetected. Based on the results of our review, we estimate 15,076 retirement beneficiaries were eligible for an additional $193.8 million in widow(er)’s benefits as of September 2019. Further, if the individuals do not apply for benefits, we estimate 12,615 of these beneficiaries could lose an additional $530.9 million in widow(er)’s benefits over their lifetimes.

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30 In some situations, SSA advises the wage earner and/or auxiliaries that, although no benefits are payable to the auxiliaries at that time, it may be beneficial to file an application. Once an application is filed, the Agency will list the auxiliaries (for example, a spouse or child) on the wage earner’s record to prevent a loss of benefits that may be payable in the future. SSA, *POMS*, GN 00204.012, H (August 25, 2014).
RECOMMENDATIONS

We recommend SSA:

1. Take appropriate action for the remaining 41 beneficiaries identified during this review.

2. Determine whether the remaining 30,665 beneficiaries in our population are due additional benefits and take appropriate action.

3. Evaluate whether improvements to the Agency’s quality reviews are needed to ensure leads for widow(er)’s benefits are appropriately developed.

4. Clarify instructions to indicate forms meeting the definition of a lead may serve as a written indication of potential entitlement to benefits.

5. Develop additional processes to identify retirement beneficiaries who are potentially eligible for widow(er)’s benefits.

AGENCY COMMENTS

SSA agreed with our recommendations; see Appendix C.

Rona Lawson
Assistant Inspector General for Audit
APPENDICES
Appendix A – Scope and Methodology

To accomplish our objective, we:

- Obtained and reviewed applicable Federal laws and regulations and the Social Security Administration’s (SSA) policies and procedures.
- Reviewed prior Office of the Inspector General reports pertaining to widow(er)s.
- Obtained and analyzed an electronic data extract from SSA’s Master Beneficiary Record and Numident containing 30,768 beneficiaries. See Appendix B for detailed information.
- Selected a random sample of 100 widow(er)s (see Appendix B). For the sampled cases, we examined information in SSA’s systems/records and third-party sources to determine whether the beneficiaries met the relationship and entitlement requirements for widow(er)s insurance benefits. Specifically, we reviewed the Master Beneficiary Record, Modernized Claims System, Numident, Claims File User Interface, Paperless, Master Earnings File, third-party database, and obituaries.
- Calculated the amount of widow(er) insurance benefits payable and total underpayments due as of September 2019. Also, we estimated future underpayments using the life tables in the Department of Health and Human Services, Centers for Disease Control and Prevention, National Vital Statistics Reports.¹
- Reviewed information in SSA’s systems² and coordinated with the Agency regarding leads and system controls for potential widow(er) entitlement.

We determined the computer-processed data used for this audit were sufficiently reliable to meet our audit objective. Further, any data limitations were minor in the context of this assignment, and the use of the data should not lead to an incorrect or unintentional conclusion.

We conducted our review between June and November 2019 at SSA’s Headquarters in Baltimore, Maryland. The principal entities audited were the Offices of the Deputy Commissioners for Operations and Systems.

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 findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

¹ Department of Health and Human Services, Centers for Disease Control and Prevention, United States Life Tables, 2017, vol. 68, no. 7 (June 2019).
² We reviewed information in SSA’s systems, including Paperless, Modernized Claims System, Online Retrieval System, Processing Center Action Control System, Evidence Screens, and Claims File User Interface.
Appendix B – Sampling Methodology and Results

We obtained an electronic data extract derived from the Social Security Administration’s (SSA) Master Beneficiary Record (20 segments) and Numident, which contained over 800,000 records. The beneficiaries met the following criteria as of January 2019:

- was a primary beneficiary,
- was not listed as a spouse or widow(er) on someone else’s record,
- was not dually entitled,
- was in current payment status,
- was age 60 or older, and
- matched a deceased wage earner
  - with the same last name,\(^1\)
  - with the same address,\(^2\)
  - who was fairly close in age,\(^3\)
  - who did not have the same parents on the Numident,\(^4\)
  - who had a different gender,
  - who died within the last 40 years, and
  - who did not have a spouse or widow(er) on their record.

We further refined the population file by excluding beneficiaries

- subject to the windfall elimination provision,
- with an insured claim type other than retirement,
- whose primary insurance amount was greater than the deceased wage earner’s primary insurance amount, or
- whose monthly benefit amount was greater than the deceased wage earner’s monthly benefit amount.

After applying the additional screening criteria, we identified 30,768 beneficiaries. We selected a random sample of 100 beneficiaries to determine whether they were eligible for widow(er)’s

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\(^{1}\) The matching operation was based on the first six characters of the last name.

\(^{2}\) The matching operation was based on the first 12 characters of the mailing address and 5-digit ZIP code.

\(^{3}\) This criterion was used to remove potential parent/child relationships. The matching operation selected records in which the age difference between the deceased wage earner and widow(er) was 14 years or less.

\(^{4}\) This criterion was used to remove potential brother/sister relationships.
benefits. We replaced three of the beneficiaries initially selected because they died before the start of our review. As a result, there are 30,665 beneficiaries remaining in our population we did not review during this audit.

### Table B–1: Population and Sample Size

<table>
<thead>
<tr>
<th>Description</th>
<th>Widow(er)s</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population Size</td>
<td>30,768</td>
</tr>
<tr>
<td>Sample Size</td>
<td>100</td>
</tr>
</tbody>
</table>

Of the 100 beneficiaries reviewed, we determined 49 were eligible for approximately $630,000 in higher widow(er)’s benefits as of September 2019. Projecting our sample results to the population, we estimate 15,076 retirement beneficiaries could have received an additional $193.8 million in widow(er)’s benefits—see Table B–2.

### Table B–2: Widow(er)s Eligible for Higher Benefits

<table>
<thead>
<tr>
<th>Description</th>
<th>Widow(er)s</th>
<th>Additional Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sample Results</td>
<td>49</td>
<td>$629,981</td>
</tr>
<tr>
<td>Point Estimate</td>
<td>15,076</td>
<td>$193,832,554</td>
</tr>
<tr>
<td>Projection—Lower Limit</td>
<td>12,431</td>
<td>$131,930,826</td>
</tr>
<tr>
<td>Projection—Upper Limit</td>
<td>17,736</td>
<td>$255,734,282</td>
</tr>
</tbody>
</table>

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

Of the 49 widow(er)s, we determined 3 widow(er)s had died, 3 became entitled to widow(er)s benefits, and 2 had already been notified by the Agency regarding their potential entitlement and need to file an application. If the remaining 41 beneficiaries do not file for benefits, we estimate 12,615 retirement beneficiaries could lose an additional $530.9 million in widow(er)’s benefits over their lifetimes—see Table B–3.

### Table B–3: Additional Benefits in the Future

<table>
<thead>
<tr>
<th>Description</th>
<th>Widow(er)s</th>
<th>Additional Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sample Results</td>
<td>41</td>
<td>$1,725,608</td>
</tr>
<tr>
<td>Point Estimate</td>
<td>12,615</td>
<td>$530,935,069</td>
</tr>
<tr>
<td>Projection—Lower Limit</td>
<td>10,065</td>
<td>$365,714,604</td>
</tr>
<tr>
<td>Projection—Upper Limit</td>
<td>15,290</td>
<td>$696,155,535</td>
</tr>
</tbody>
</table>

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

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5 The future projection is based on 41 of the 49 widow(er)s. These 41 widow(er)s are expected to live 3 to 19 more years based on life expectancy data from the Department of Health and Human Services, Centers for Disease Control and Prevention, *United States Life Tables, 2017*, vol. 68, no. 7, pp. 12-15 (June 2019).
MEMORANDUM

Date: May 27, 2020

To: Gail S. Ennis
   Inspector General

From: Stephanie Hall
   Chief of Staff


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.
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