
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**DUALLY ENTITLED BENEFICIARIES
WHO ARE SUBJECT TO GOVERNMENT
PENSION OFFSET AND THE WINDFALL
ELIMINATION PROVISION**

September 2008

A-09-07-27010

AUDIT REPORT



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SOCIAL SECURITY

MEMORANDUM

Date: September 10, 2008

Refer To:

To: The Commissioner

From: Inspector General

Subject: Dually Entitled Beneficiaries who are Subject to Government Pension Offset and the Windfall Elimination Provision (A-09-07-27010)

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) properly imposed the Government Pension Offset (GPO) and the Windfall Elimination Provision (WEP) for dually entitled beneficiaries.

BACKGROUND

The *Social Security Act* includes two provisions that reduce Social Security monthly benefits paid to individuals who receive a pension based on Federal, State, or local government employment that was not covered by Social Security. The WEP eliminates "windfall" Social Security benefits for retired and disabled workers receiving pensions from employment not covered by Social Security.¹ Under this provision, a modified benefit formula is used to determine a wage earner's monthly Social Security benefit.² The GPO provision reduces monthly Social Security benefits for spouses, divorced spouses, and surviving spouses who receive a pension based on their own work for a Federal, State or local government that was not covered by Social Security.³ The GPO reduction is generally equal to two-thirds of the government pension.⁴ Dually entitled beneficiaries, those entitled to retirement benefits (based on their own earnings) and spousal benefits (based on another person's earnings) at the same time, are subject to both the WEP and GPO provisions.

¹ *The Social Security Act* § 215(a)(7)(A), (d)(3), and (f)(9), 42 U.S.C. § 415(a)(7)(A), (d)(3), and (f)(9); 20 C.F.R. §§ 404.213 and 404.243.

² *The Social Security Act* § 215(a)(7)(B), 42 U.S.C. § 415(a)(7)(B); 20 C.F.R. § 404.213(c) and (d); SSA, Program Operations Manual System (POMS), RS 00605.360.

³ *The Social Security Act* § 202(k)(5), 42 U.S.C. § 402(k)(5); 20 C.F.R. § 404.408a.

⁴ *The Social Security Act* § 202(k)(5), 42 U.S.C. § 402(k)(5); 20 C.F.R. § 404.408a(d); SSA, POMS, GN 02608.100.

To identify individuals who may be subject to WEP and GPO, SSA primarily relies on applicants to report whether they are receiving, or will receive in the future, a pension based on non-covered earnings. However, for retired Federal employees, SSA receives monthly pension data from the Office of Personnel Management.⁵

As of March 2007, we estimate there were approximately 153,900 dually entitled beneficiaries with WEP imposed on their retirement or disability benefit and approximately 170,000 dually entitled beneficiaries with GPO imposed on their spousal benefit.⁶

RESULTS OF REVIEW

We found that SSA needs to improve its controls and procedures to ensure GPO and WEP are properly imposed for dually entitled beneficiaries. Based on our review of 2 random samples of 200 beneficiaries, we estimate that SSA overpaid about

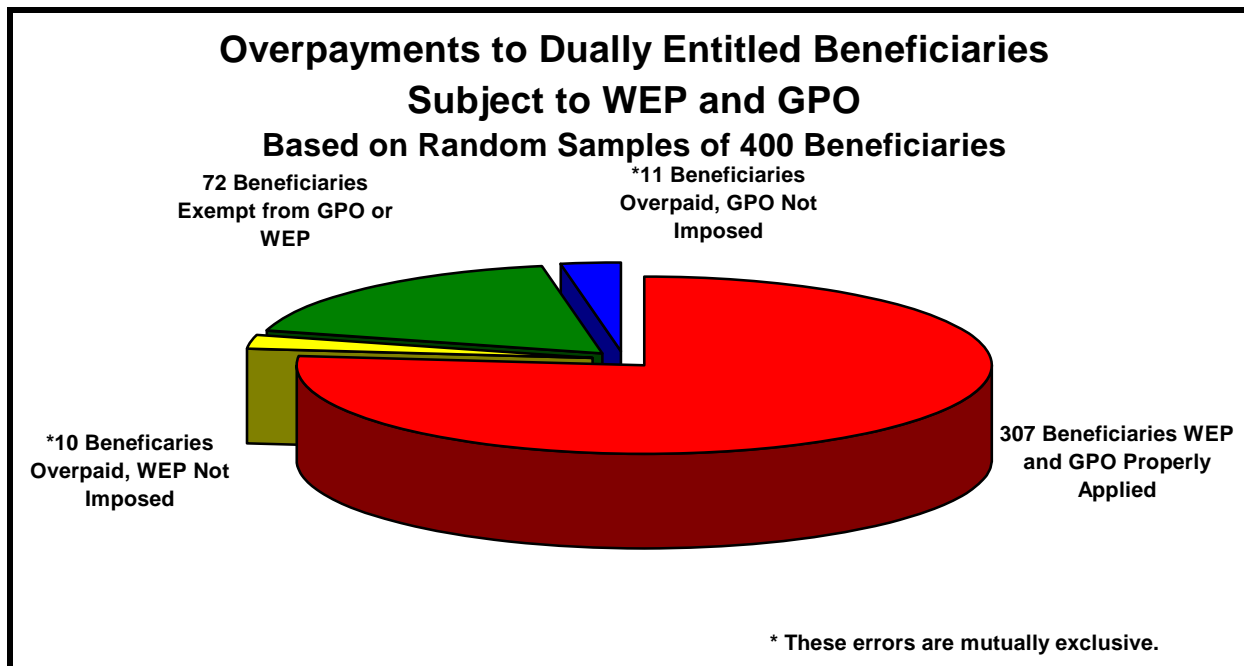
- \$269.8 million in retirement benefits to 8,500 beneficiaries because WEP was not properly applied, and
- \$184.8 million in spousal benefits to 8,460 beneficiaries because GPO was not properly imposed.

Finally, unless SSA takes action to identify and correct these payment errors, we estimate it will pay about \$53.2 million in overpayments annually (see Appendix C).

These errors occurred because SSA did not have controls in place to ensure the pension information it maintained for dually entitled beneficiaries was annotated to all its records. Our sample results are summarized below.

⁵ SSA, POMS, GN 02608.301 and RS 00605.374.

⁶ The Master Beneficiary Record (MBR) is divided into 20 segments with each segment representing 5 percent of all records. We identified a population of 7,695 dually entitled beneficiaries who had WEP imposed on their retirement benefit from 1 segment of the MBR. As a result, we estimate that approximately 153,900 beneficiaries (7,695 x 20) had WEP imposed on their retirement or disability benefit. In addition, we identified a population of 8,500 dually entitled beneficiaries who had GPO imposed on their spousal benefit from 1 segment of the MBR. As a result, we estimate that approximately 170,000 beneficiaries (8,500 x 20) had GPO imposed on their spousal benefit.



WEP Payment Errors

Generally, if GPO has been applied to the spousal benefit, WEP should be applied to the retirement benefit. However, under certain conditions, individuals may be granted exceptions from WEP. For example, WEP does not apply to beneficiaries who were eligible for retirement benefits before 1986 or to individuals with 30 or more years of “substantial earnings.”⁷ If WEP does not apply, the reason for an exception must be annotated to the MBR,⁸ which contains the beneficiary’s entitlement and payment information. Finally, SSA should also document in its records any evidence it reviewed to assess the applicability of WEP.

We estimate there were about 170,000 dually entitled beneficiaries with GPO imposed on their spousal benefit.⁹ Our review of a random sample of 200 of these beneficiaries disclosed that SSA did not reduce the retirement benefits of 10 beneficiaries in accordance with the WEP requirements. In addition, we found that SSA did not have adequate paper or electronic documentation to support whether an exception to WEP applied. As a result, the 10 beneficiaries were overpaid \$317,447. Based on our sample results, we estimate that 8,500 dually entitled beneficiaries were overpaid about \$269.8 million (see Appendix C).

⁷ *The Social Security Act* § 215(a)(7)(D), 42 U.S.C. § 415(a)(7)(D); 20 C.F.R. § 404.213(e). For 2007, \$18,150 of covered wages was required to obtain a year of coverage (SSA, POMS, RS 00605.362).

⁸ SSA, POMS, RS 00605.374.B.1.

⁹ See Footnote 6 on p. 2.

These 10 errors occurred because, when the individuals filed for retirement benefits, they did not disclose they were receiving a pension based on noncovered earnings or would receive a pension in the future, or SSA did not document pension information in its records. However, we found that SSA had obtained pension information when the individuals filed for spousal benefits. Although SSA reduced the payments for the spousal benefit in accordance with the GPO provision, it did not take corrective actions to reduce the retirement benefit in accordance with WEP or document that an exception to WEP applied. Finally, we found that these errors were not prevented or detected because SSA did not have a control in place to ensure pension information was annotated to both retirement and spousal records (that is, MBRs) for dually entitled beneficiaries.

For example, one beneficiary in our sample initially filed for retirement benefits in July 1986 before receiving a noncovered pension. SSA's records contained no information indicating the beneficiary would be receiving a noncovered pension in the future. In September 2002, the beneficiary filed for survivor's benefits. At that time, SSA documented the beneficiary was eligible for the pension beginning in September 1986 and reduced the payments for the spousal benefit effective September 2002 in accordance with the GPO provision. However, the noncovered pension information was not documented on the retirement benefit. Consequently, WEP was not applied to the retirement benefit in accordance with its provision. As a result, SSA overpaid the beneficiary \$40,300 from September 1986 to December 2007.

GPO Payment Errors

Generally, if WEP has been applied to an individual's retirement benefit, GPO should be applied to the spousal benefit. However, under certain conditions, individuals receiving spousal benefits may be granted exceptions from GPO.¹⁰ For example, GPO does not apply to individuals who were covered by both a government retirement system and Social Security throughout their last 60 months of employment of Federal, State, and local government service¹¹ or if the individual is receiving a non-covered military reserve pension.¹² If GPO does not apply, the reason for an exception must be annotated to the MBR,¹³ and documentation supporting the exception should be in SSA's records.

¹⁰ *The Social Security Act* § 202(k)(5), 42 U.S.C. § 402(k)(5); 20 C.F.R. § 404.408a(b); SSA, POMS, GN 02608.100.A.1.

¹¹ *The Social Security Act* § 202(k)(5)(A), 42 U.S.C § 402(k)(5)(A); SSA, POMS, GN 02608.107.

¹² *The Social Security Act* § 202(k)(5)(B)(i), 42 U.S.C. § 402(k)(5)(B)(i); SSA, POMS, GN 02608.700.

¹³ SSA, POMS, GN 02608.200.A.4.

We estimate there were about 153,900 dually entitled beneficiaries with WEP applied to their retirement benefits.¹⁴ Our review of a random sample of 200 beneficiaries disclosed that SSA did not reduce the spousal benefits of 11 beneficiaries in accordance with the GPO provision. In addition, we found that SSA did not have adequate paper or electronic documentation to support whether an exception to GPO applied. As a result, the 11 beneficiaries were overpaid \$240,198. Based on our sample results, we estimate that 8,460 dually entitled beneficiaries were overpaid approximately \$184.8 million (see Appendix C).

For the 11 beneficiaries, SSA had obtained and recorded information about the noncovered pensions on the beneficiaries' retirement records (that is, MBRs) and reduced the benefit payments in accordance with WEP. However, because of administrative oversight, SSA had not used the information to reduce the spousal benefit in accordance with the GPO provision or document that an exception to GPO applied. Finally, we found that these errors were not prevented or detected because SSA did not have a control in place to ensure pension information was annotated to both payment records (that is, MBRs) for dually entitled individuals.

For example, one beneficiary in our sample started receiving retirement and spousal benefits in April 1999. The pension information was documented on the retirement record but not on the spousal record. WEP was applied to the retirement benefit when the beneficiary started receiving the noncovered government pension. However, GPO was not applied to the spousal benefit. As a result, SSA overpaid the beneficiary \$49,000 between April 1999 and December 2007.

CONCLUSION AND RECOMMENDATIONS

SSA needs to improve its controls and procedures to ensure GPO and WEP are properly imposed for dually entitled beneficiaries. Specifically, our review identified an estimated 8,500 beneficiaries who were overpaid about \$269.8 million in retirement benefits because WEP was not properly applied and 8,460 beneficiaries who were overpaid about \$184.8 million in spousal benefits because GPO was not properly imposed. Finally, unless SSA takes corrective action to identify and correct these payment errors, we estimate it will pay approximately \$53.2 million in overpayments annually (see Appendix C).

¹⁴ See Footnote 6 on p. 2.

We recommend that SSA:

1. Take corrective action to establish overpayments or determine whether a WEP or GPO exception applies for the beneficiaries identified by our audit.
2. Identify and take corrective action on the population of dually entitled beneficiaries who may be overpaid because WEP or GPO was not properly imposed.
3. Improve controls to ensure that pension information based on non-covered employment for dually entitled beneficiaries is properly recorded on all beneficiary payment records (that is, MBRs).
4. Remind employees to review pension information on all SSA payment records for dually entitled beneficiaries.

AGENCY COMMENTS

SSA agreed with all of our recommendations. See Appendix D for the text of SSA's comments.



Patrick P. O'Carroll, Jr.

Appendices

[APPENDIX A](#) – Acronyms

[APPENDIX B](#) – Scope and Methodology

[APPENDIX C](#) – Sampling Methodology and Results

[APPENDIX D](#) – Agency Comments

[APPENDIX E](#) – OIG Contacts and Staff Acknowledgments

Acronyms

GPO	Government Pension Offset
MBR	Master Beneficiary Record
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
WEP	Windfall Elimination Provision

Scope and Methodology

We obtained two data extracts from which we identified two populations. The first population consisted of 8,500 dually entitled Old-Age, Survivors and Disability Insurance beneficiaries who had Government Pension Offset (GPO) data recorded on their spousal or surviving spousal benefit. The second population consisted of 7,695 Old-Age, Survivors and Disability Insurance beneficiaries who had Windfall Elimination Provision (WEP) data recorded on their record. We randomly selected a sample of 200 beneficiaries from each population.

To achieve our objective, we

- reviewed the applicable sections of the *Social Security Act*, U.S. Code, and the Social Security Administration's (SSA) Program Operations Manual System;
- interviewed SSA employees from the Western Program Service Center and Baltimore, Maryland;
- reviewed prior audit reports pertaining to GPO and WEP;
- obtained necessary files from the Master Beneficiary Record, Detailed Earning Query, Modernized Claims System, and Modernized Development Worksheet;
- reviewed SSA's paperless system, Shared Process System, and the Non Disability Repository for Evidentiary Documents for supporting documentation; and
- obtained and reviewed case folders, as needed.

We determined whether the computer-processed data 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 objectives.

We performed our work in Richmond, California, between September 2007 and May 2008. The entities reviewed were the Offices of 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 our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Sampling Methodology and Results

We obtained two data extracts from a 5 percent segment of the Master Beneficiary Record (MBR). The data extracts consisted of

1. spouse and surviving spouse beneficiaries who had Government Pension Offset (GPO), and
2. retirement beneficiaries whose benefits were based on the Windfall Elimination Provision (WEP).

Spouses with GPO

We refined this population to include only beneficiaries who had an initial entitlement date after 1985 and were entitled to a retirement benefit. This resulted in a population of 8,500 beneficiaries. From this population, we randomly selected a sample of 200 beneficiaries for review. For each beneficiary in our sample, we determined whether the Social Security Administration (SSA) properly applied WEP to the retirement benefits by reviewing information from the MBR, Master Earnings File, Modernized Claims System and the Modernized Development Worksheet. In addition, we reviewed SSA's Paperless System, Shared Process System, and the Non Disability Repository for Evidentiary Documents. Finally, we obtained and reviewed case folders, as necessary.

Of the 200 beneficiaries in our sample, we found that SSA overpaid \$317,447 to 10 beneficiaries. This occurred because their retirement benefits were subject to WEP. Estimating these results to all 20 segments of the MBR, SSA overpaid about \$269.8 million to 8,500 beneficiaries. The following tables provide the details of our sample results, statistical projections, and estimates.

Table 1: Population and Sample Size	Number
Population Size (data extract from 1 segment)	8,500
Sample Size	200
Estimated Number in Universe (Population Size x 20 segments)	170,000

Table 2: Overpayments	Number	Amount
Sample Results (for 1 segment)	10	\$317,447
Point Estimate (for 1 segment)	425	\$13,491,480
Projection - Lower Limit	235	\$6,256,354
Projection - Upper Limit	705	\$20,726,605
Population Estimate (Point Estimate x 20 segments)	8,500	\$269,829,600

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

To estimate the annual amount of overpayments that would occur if SSA does not take corrective action to identify and correct payment errors related to the improper application of WEP, we used our population estimates and the average overpayment amount in 2007 for our sampled beneficiaries. Using this methodology, we estimate that SSA will overpay about \$21 million ($\$2,469 \times 8,500 = \$20,986,500$) in retirement benefits.

Retirees with WEP

We refined this population to include beneficiaries who were also entitled to a spousal benefit. This resulted in a population of 7,695 beneficiaries. From this population, we randomly selected a sample of 200 beneficiaries for review. For each beneficiary in our sample, we determined whether SSA properly imposed GPO to the spousal benefit by reviewing information from the MBR, Master Earnings File, Modernized Claims System and the Modernized Development Worksheet. In addition, we reviewed SSA's Paperless System, Shared Process System, and the Non Disability Repository for Evidentiary Documents. Finally, we obtained and reviewed case folders, as necessary.

Of the 200 beneficiaries in our sample, we found that SSA overpaid \$240,198 to 11 beneficiaries. This occurred because their spousal benefits were subject to GPO. Estimating these results to all 20 segments of the MBR, SSA overpaid about \$184.8 million to 8,460 beneficiaries. The following tables provide the details of our sample results, statistical projections, and estimates.

Table 3: Population and Sample Size	Number
Population Size (data extract from 1 segment)	7,695
Sample Size	200
Estimated Number in Universe (Population Size x 20 segments)	153,900

Table 4: Overpayment Payments	Number	Amount
Sample Results (for 1 segment)	11	\$240,198
Point Estimate (for 1 segment)	423	\$9,241,646
Projection - Lower Limit	242	\$3,831,505
Projection - Upper Limit	684	\$14,651,788
Population Estimate (Point Estimate x 20 segments)	8,460	\$184,832,920

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

To estimate the annual amount of overpayments that would occur if SSA does not take corrective action to identify and correct payment errors related to the improper application of GPO, we used our population estimates and the average overpayment amount in 2007 for our sampled beneficiaries. Using this methodology, we estimate that SSA will overpay about \$32.2 million ($\$3,810 \times 8,460 = \$32,232,600$) in spousal benefits.

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: August 28, 2008 **Refer To:** S1J-3

To: Patrick P. O'Carroll, Jr.
Inspector General

From: David V. Foster /s/ (Jim Winn for David Foster)
Executive Counselor to the Commissioner

Subject: Office of the Inspector General (OIG) Draft Report, "Dually Entitled Beneficiaries Who Are Subject to Government Pension Offset and the Windfall Elimination Provision" (A-09-07-27010)—INFORMATION

We appreciate OIG's efforts in conducting this review. Our response to the report findings and recommendations are attached.

Please let me know if we can be of further assistance. Staff inquiries may be directed to Candace Skurnik, Director, Audit Management and Liaison Staff, at (410) 965-4636.

Attachment

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "DUALY ENTITLED BENEFICIARIES WHO ARE SUBJECT TO GOVERNMENT PENSION OFFSET AND THE WINDFALL ELIMINATION PROVISION" (A-09-07-27010)

Thank you for the opportunity to review and comment on the draft report. We support initiatives that help strengthen our ability to ensure good stewardship for our programs. We are encouraged that the review found that we are making accurate payments to 95 percent of the population. For the remaining 5 percent, we do not believe the results of this review provide enough evidence to estimate or project overpayment amounts. Below are our responses to the specific recommendations.

Recommendation 1

Take corrective action to establish overpayments or determine whether a Windfall Elimination Provision (WEP) or Government Pension Offset (GPO) exception applies for the beneficiaries identified by our audit.

Response

We agree. Once we receive the cases from OIG, we will review the information and take necessary action.

Recommendation 2

Identify and take corrective action on the population of dually entitled beneficiaries who may be overpaid because WEP or GPO was not properly imposed.

Response

We agree in principle, but before committing to review possibly 300,000 records, we would have to carefully examine the cases identified in this audit to determine if such a large scale review is truly warranted. Given the information we presently have, we are not convinced the overpayment problem is as extensive as you suggest. For instance, in the example cited on page 4, the overpayment (from 1986 to 2002) could not have been prevented based on the criteria in the study since the beneficiary did not file for the Widow(er)'s Insurance Benefit until 2002. Regarding the 10 WEP and 11 GPO cases in this review, an exemption may have applied, but was not documented. Therefore, we will defer extensive action on this recommendation until we have had the opportunity to review the cases in greater detail.

Recommendation 3

Improve controls to ensure that pension information based on non-covered employment for dually entitled beneficiaries is properly recorded on all beneficiary payment records (that is, Master Beneficiary Records).

Response

We agree in principle. The best approach for obtaining and recording this type of information would be to establish computer matches between our records and State/local pension information. However, at the present time, a match program of this type is not possible due to limited systems resources. In the interim, we believe our review of the cases and the issuance of a reminder will help improve controls.

Recommendation 4

Remind employees to review pension information on all payment records for dually entitled beneficiaries.

Response

We agree. We will issue a reminder that will include information on any specific patterns or trends obtained from our review of the cases.

OIG Contacts and Staff Acknowledgments

OIG Contacts

James J. Klein, Director, San Francisco Audit Division, (510) 970-1739

Joseph Robleto, Audit Manager, (510) 970-1737

Acknowledgments

In addition to those named above:

Manfei Lau, Senior Auditor

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