OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

Audit Report

Social Security Beneficiaries Financially Advantaged by Electing to Convert from Disability Benefits to Reduced Retirement Benefits

A-07-18-50636 | January 2021

MEMORANDUM

Date: January 14, 2021 **Refer To:**

To: The Commissioner

From: Inspector General

Subject: Social Security Beneficiaries Financially Advantaged by Electing to Convert from Disability Benefits to Reduced Retirement Benefits (A-07-18-50636)

The attached final report presents the results of the Office of Audit's review. The objective was to determine the extent to which section 202(q)(7)(F) of the *Social Security Act* gave a financial advantage to certain disability beneficiaries.

Please provide within 60 days a corrective action plan that addresses each recommendation. 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.

Gail S. Ennis

Gail S. Ennis

Attachment

Social Security Beneficiaries Financially Advantaged by Electing to Convert from Disability Benefits to Reduced Retirement Benefits
A-07-18-50636

SOCIAL SECURITY ADMINISTRATION
OIG

January 2021 **Office of Audit Report Summary**

Objective

To determine the extent to which section 202(q)(7)(F) of the *Social Security Act* (Act) gave a financial advantage to certain disability beneficiaries.

Background

Beneficiaries may elect to receive reduced retirement benefits as young as age 62. When beneficiaries begin receiving retirement benefits before full retirement age (FRA), the Social Security Administration (SSA) generally permanently reduces the payment amount based on the number of months before FRA they begin receiving payments.

When disability beneficiaries elect to receive reduced retirement benefits, the reduction is not permanent, as it is for non-disability beneficiaries. Specifically, for beneficiaries who (1) were entitled to both disability and retirement benefits and (2) elected to receive reduced retirement benefits, section 202(q)(7)(F) requires that SSA pay a higher benefit amount when the beneficiary reaches FRA.

From the Master Beneficiary Record, we identified 32,474 beneficiaries who, as of September 5, 2019, (1) had reached FRA, (2) had been entitled to disability benefits and elected to receive reduced retirement benefits, (3) were in current payment status, and (4) were entitled to a higher benefit amount at FRA. We reviewed a random sample of 100 beneficiaries from this population.

Findings

Section 202(q)(7)(F) of the Act gave a financial advantage to 89 of 100 beneficiaries in our sample. By electing reduced retirement benefits, they received higher payments than they would have had they continued receiving disability benefits. Of the 89 beneficiaries,

- 70 avoided a reduction because they were receiving workers' compensation or public disability payments;
- 11 increased total payments for their families; and
- 8 avoided a reduction because they returned to work.

When they reached FRA, the Act provided them a financial advantage because it required that SSA remove the age-based reduction for any months the individual was entitled to both disability and reduced retirement benefits and begin paying higher retirement benefits.

Because section 202(q)(7)(F) of the Act gave them an advantage, these 89 beneficiaries have already received approximately $1.8 million more in benefits since FRA. Further, 86 of the 89 beneficiaries will receive an estimated $2.4 million more in benefits because this advantage continues through the rest of their lives. We estimate this provision will result in approximately 29,000 beneficiaries receiving almost $1.4 billion in additional lifetime benefits.

Recommendation

We recommend SSA determine whether it should propose a change to section 202(q)(7)(F) of the Act to eliminate the financial advantage it gives to certain disability beneficiaries. SSA disagreed with our recommendation and deferred to Congress to determine whether a legislative change is necessary.

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ABBREVIATIONS

Act	*Social Security Act*
C.F.R.	Code of Federal Regulations
FRA	Full Retirement Age
OIG	Office of the Inspector General
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
SSA	Social Security Administration
U.S.C.	United States Code

OBJECTIVE

Our objective was to determine the extent to which section 202(q)(7)(F) of the *Social Security Act* (Act) gave a financial advantage to certain disability beneficiaries.[1]

BACKGROUND

The Old-Age, Survivors and Disability Insurance program provides benefits to wage earners and their family members who meet certain criteria in the event the wage earner retires, becomes disabled, or dies.[2] The age at which beneficiaries elect to start receiving retirement benefits affects their payment amount.[3] Beneficiaries who begin receiving retirement benefits at full retirement age (FRA) receive their full, unreduced benefit payment.[4] FRA ranges from 65 to 67 depending on the beneficiary's date of birth.[5]

Beneficiaries may elect to receive reduced retirement benefits as early as age 62. When beneficiaries begin receiving retirement benefits before FRA, the Social Security Administration (SSA) reduces the payment amount based on the number of months before FRA they begin receiving payments. For example, when a beneficiary begins receiving retirement benefits 36 months before FRA, SSA reduces the payments by 20 percent. For non-disability beneficiaries, this reduction is usually permanent.[6]

When disability beneficiaries reach age 62, they also become eligible for retirement benefits and can elect which benefit to receive.[7] These beneficiaries usually elect to continue receiving disability benefits because SSA does not reduce the payments based on age. Thus, the disability payment is generally higher than the reduced retirement payments.[8] However, some disability

[1] *Social Security Act*, 42 U.S.C. § 402(q)(7)(F) (govinfo.gov 2018).

[2] *Social Security Act,* 42 U.S.C. §§ 402, 423 (govinfo.gov 2018).

[3] *Social Security Act*, 42 U.S.C. §§ 402(a) and (q) and 416(l) (govinfo.gov 2018); 20 C.F.R. §§ 404.409(c) and 404.410 (govinfo.gov 2019).

[4] 20 C.F.R. § 404.409 (govinfo.gov 2019); SSA, *POMS*, RS 00615.003 (May 21, 2004).

[5] SSA, *POMS*, RS 00615.003 (May 21, 2004) and RS 00615.005, A.1 and A.2 (September 16, 2002).

[6] *Social Security Act*, 42 U.S.C. § 402(q) (govinfo.gov 2018); 20 C.F.R. § 404.410 (govinfo.gov 2019); SSA, *POMS*, RS 00615.101 (March 29, 2017).

[7] *Social Security Act*, 42 U.S.C. §§ 402(a) and (k)(4) and 423(a)(1)(B) (govinfo.gov 2018).

[8] *Social Security Act*, 42 U.S.C. § 423(a)(2) (govinfo.gov 2018); 20 C.F.R. § 404.317 (govinfo.gov 2019); SSA, *POMS*, DI 10105.090, A. (June 29, 2012).

beneficiaries can receive higher payments by converting to reduced retirement benefits. Specifically, reduced retirement benefits may be higher for disability beneficiaries who

- are receiving workers' compensation or public disability payments,
- have family members who receive benefits on their record, or
- are working.

When disability beneficiaries elect to receive reduced retirement benefits, the reduction is not permanent, as it is for non-disability beneficiaries. Specifically, for beneficiaries who (1) were entitled to both disability and retirement benefits and (2) elected to receive reduced retirement benefits, section 202(q)(7)(F) of the Act requires that SSA remove age-based reductions and pay a higher benefit amount when they reach FRA.[9] Congress added this provision as part of the *Social Security Amendments of 1965*.[10] At that time, Medicare coverage was not available to disability beneficiaries' spouses. The provision allowed disability beneficiaries to switch to reduced retirement benefits so their spouses could receive Medicare coverage without affecting the beneficiaries' future retirement benefits by allowing for an unreduced payment when they reach FRA.[11]

A spouse's Medicare eligibility no longer depends on whether the wage earner is receiving disability or retirement benefits.[12] Despite this, section 202(q)(7)(F) still allows certain disability beneficiaries to switch to reduced retirement benefits when it benefits them without facing the same permanent benefit reduction that applies to non-disability beneficiaries. This enables them to receive more benefits both before and after FRA.

From the Master Beneficiary Record, we identified 32,474 beneficiaries who, as of September 5, 2019, (1) had reached FRA, (2) had been entitled to disability benefits and elected to receive reduced retirement benefits, (3) were in current payment status, and (4) were entitled to a higher benefit amount at FRA. We reviewed a random sample of 100 beneficiaries from this population to determine whether section 202(q)(7)(F) of the Act gave them a financial advantage.

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[9] *Social Security Act*, 42 U.S.C. § 402(q)(7)(F) (govinfo.gov 2018); 20 C.F.R. § 404.412(a)(6) (govinfo.gov 2019); SSA, *POMS*, RS 00615.482, B.1 (August 23, 2017).

[10] *Social Security Amendments of 1965,* Pub. L. No. 89-97, § 304(b), 79 Stat. 286, pp. 368-70 (1965).

[11] Staff of House Ways and Means Committee, 93rd Congress, *Committee Staff Report on the Disability Insurance Program*, p. 116 (1974).

[12] SSA, *POMS*, HI 00801.008, B. (December 17, 2020). This requirement changed in 1980. See *Act of October 19, 1980*, Pub. L. No. 96-473, § 2, 94 Stat. 2263 (1980); *Social Security Act*, 42 U.S.C. § 426(a) (govinfo.gov 2018).

Results of Review

Section 202(q)(7)(F) of the Act gave a financial advantage to 89 of the 100 beneficiaries in our sample. By electing to convert to reduced retirement benefits, they received higher payments than they would have if they continued receiving disability benefits. When they reached FRA, this section of the Act provided them a financial advantage because it required that SSA remove the age-based reduction for any months the individual was entitled to both disability and reduced retirement benefits and begin paying higher retirement benefits.[13]

- Seventy beneficiaries increased their benefits before FRA by converting from disability to reduced retirement benefits because they were receiving workers' compensation or public disability payments.[14] SSA reduces disability benefits for certain beneficiaries who receive workers' compensation or public disability payments. This reduction does not apply to retirement benefits.[15] Further, because of the financial advantage provided by section 202(q)(7)(F), these 70 beneficiaries will receive more than $3.4 million in additional payments from FRA through the end of their lives.[16]

- Eleven beneficiaries increased total payments for their families before FRA by converting from disability to reduced retirement benefits because eligible spouses and children usually receive higher payments when the wage earner is receiving retirement benefits.[17] Further, because of the financial advantage provided by section 202(q)(7)(F), these 11 beneficiaries will receive more than $544,000 in additional payments from FRA through the end of their lives.

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[13] *Social Security Act*, 42 U.S.C. § 402(q)(7)(F) (govinfo.gov 2018); 20 C.F.R. § 404.412(a)(6) (govinfo.gov 2019); SSA, *POMS*, RS 00615.482, B.1 (August 23, 2017).

[14] Workers' compensation provides payments to workers injured on the job or who have a work-related illness. A public disability benefit is a disability benefit required by a law or plan of a Federal, State, or local governmental entity. SSA, *POMS*, DI 52101.001 (September 18, 2018).

[15] *Social Security Act*, 42 U.S.C. § 424a(a) (govinfo.gov 2018); 20 C.F.R. § 404.408 (govinfo.gov 2019); SSA, *POMS*, DI 52101.001, A.2 (September 18, 2018).

[16] See Appendix A for a discussion on how we determined life expectancy and calculated additional lifetime benefits.

[17] The Act limits the amount of monthly benefits SSA can pay on any one record. SSA calculates this amount differently when the wage earner is receiving disability benefits. *Social Security Act*, 42 U.S.C. §§ 403(a)(1) and (a)(6) (govinfo.gov 2018); 20 C.F.R. §§ 404.403 (d) and (d-1) (govinfo.gov 2019); SSA, *POMS*, RS 00615.730, 1 (September 16, 2002), RS 00615.736, B.1 (June 14, 2005) and RS 00615.742, 1 (November 14, 2016).

- Eight beneficiaries increased their benefits before FRA by converting from disability to reduced retirement benefits because they returned to work. Beneficiaries who receive reduced retirement benefits can earn more before SSA reduces their payments than those who receive disability benefits. Further, because of the financial advantage provided by section 202(q)(7)(F), these eight beneficiaries will receive more than $210,000 in additional payments from FRA through the end of their lives.

These 89 beneficiaries gained a financial advantage because they did not face the same permanent benefit reduction that applies to non-disability beneficiaries who elect to receive retirement benefits before FRA. For example, SSA was paying a beneficiary $229 per month after it reduced his disability benefits because he was receiving workers' compensation payments. When he reached age 62 in November 2014, he became eligible for $996 in monthly reduced retirement benefits, which are not affected by workers' compensation payments.[18] Though the beneficiary remained entitled to disability benefits, he elected to receive reduced retirement benefits from November 2014 through October 2018 when he reached FRA. In October 2018, as required by section 202(q)(7)(F) of the Act, SSA increased his monthly payment to $1,374—the amount he would have received had he begun receiving benefits at FRA.[19] As of September 2019, SSA had paid this beneficiary $4,149 more than it would have had his benefits remained reduced. Further, we estimate SSA will pay him an additional $80,496 in benefits through the rest of his life.[20]

Because section 202(q)(7)(F) required that SSA increase these 89 beneficiaries' payments, it paid them approximately $11.9 million from the date they reached FRA through September 2019. Had these beneficiaries continued receiving reduced benefits, SSA would have paid them approximately $10.1 million. Further, SSA will pay 86 of the 89 beneficiaries an estimated $17.5 million from October 2019 through the rest of their lives.[21] Conversely, had SSA reduced their benefits permanently, it would pay these beneficiaries approximately $15.1 million (see Table 1).

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[18] *Social Security Act*, 42 U.S.C. § 424a(a) (govinfo.gov 2018); 20 C.F.R. § 404.408(a) (govinfo.gov 2019); SSA, *POMS*, DI 52101.001, A.2 (September 18, 2018).

[19] *Social Security Act*, 42 U.S.C. § 402(q)(7)(F) (govinfo.gov 2018); 20 C.F.R. § 404.412(a)(6) (govinfo.gov 2019); SSA, *POMS*, RS 00615.482, B.1 (August 23, 2017).

[20] See Appendix A for a discussion on how we determined life expectancy and calculated additional lifetime benefits.

[21] SSA will not pay additional benefits for three beneficiaries because they became entitled to benefits on a spouse's record after they reached FRA and before we began our review. When a beneficiary is receiving benefits on both his/her own and his/her spouse's record, SSA bases the benefit amount on the spouse's earnings. *Social Security Act,* 42 U.S.C. § 402 (govinfo.gov 2018); 20 C.F.R. §§ 404.333, 404.338, and 404.342 (govinfo.gov 2019); SSA, *POMS*, RS 00202.020, A.1 and A.2 (September 22, 2016), RS 00207.002, A.1 (April 14, 2009), and RS 00208.015, A.1 (March 27, 2012).

Table 1: Difference in Expected Lifetime Benefits for 89 Sampled Beneficiaries Based on Section 202(q)(7)(F)

	FRA Through September 2019	October 2019 Through Expected Remainder of Their Lives	Total
Benefits Payable Based on Section 202(q)(7)(F) of the Act	$11,856,963	$17,527,317	$29,384,280
Benefits Payable if Payment Reduction Was Permanent	$10,081,894	$15,129,814	$25,211,708
Difference in Benefits Payable Based on Section 202(q)(7)(F) of the Act	**$1,775,069**	**$2,397,503**	**$4,172,572**

Because section 202(q)(7)(F) gave these 89 beneficiaries a financial advantage for which other beneficiaries did not qualify, they have already received approximately $1.8 million in additional benefits since FRA. For our population, we project the provision has allowed approximately 29,000 beneficiaries to receive more than $576 million in additional benefits.

Further, 86 of the 89 beneficiaries will receive an estimated $2.4 million more in benefits because this advantage continues through the rest of their lives. For our entire population, we project the provision will allow approximately 28,000 of the 29,000 beneficiaries to receive nearly an additional $779 million—on top of the $576 million already received—through the rest of their lives.

CONCLUSIONS

These 89 beneficiaries elected to receive reduced retirement benefits and gained a financial advantage because section 202(q)(7)(F) of the Act required that SSA calculate their payments differently after FRA than it does for non-disability beneficiaries who receive reduced retirement benefits. We estimate this provision will result in approximately 29,000 beneficiaries receiving almost $1.4 billion in additional lifetime benefits. As long as the provision remains in place, more beneficiaries will become eligible for the same financial advantage, compounding the effect on SSA's Trust Funds.

RECOMMENDATION

We recommend SSA determine whether it should propose a change to section 202(q)(7)(F) of the Act to eliminate the financial advantage it gives to certain disability beneficiaries.

AGENCY COMMENTS

SSA disagreed with our recommendation and deferred to Congress to determine whether a legislative change is necessary. See Appendix C.

OIG RESPONSE

We agree only Congress can enact or change laws stipulating how SSA computes benefits. However, as detailed in Circular No. A-19, SSA's Office of Legislation and Congressional Affairs coordinates the development of legislative proposals and determines which proposals it will submit to the Office of Management and Budget.[22] For example, in support of its Fiscal Year 2021 Congressional Budget Justification, SSA coordinated with the Office of Management and Budget on several legislative proposals to change how it computes certain individuals' benefits. These proposals included changes to the way SSA determines payment amounts for disability beneficiaries entitled to retroactive benefits and Supplemental Security Income recipients with multiple eligible children or who live with other adults. In prior correspondence related to this report, SSA stated, "This report, which only quantifies the scope of the benefits this provision provides to certain people, does not meet the threshold for us to begin consideration of a legislative proposal to change it. For that, we would want additional policy justification and analysis of other factors, such as the effects such a change would have on beneficiaries, whether intended or not, and the effect on Social Security's operations."[23]

In response to our recommendation, SSA did not provide evidence it assessed, or plans to assess, any of these factors to determine the appropriateness of a legislative proposal. We believe the magnitude of our audit results and actions by Congress in Pub. L. No. 96-473, which changed Medicare eligibility requirements and appears to negate the need for this benefit-election provision, justify SSA's consideration of the feasibility of a legislative proposal.[24]

Michelle L Anderson

Michelle L. Anderson
Assistant Inspector General for Audit

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[22] OMB, *Legislative Coordination and Clearance*, Circular No. A-19, section 7a, p. 7 (Revised September 1979).

[23] SSA, DCARO, Audit Liaison Staff, *RE: OIG Response to SSA Comments on OIG's Informal Preliminary Findings - RE: Audit No. 22020020: Signed Preliminary Draft Report (A-07-18-50636)* (Email September 18, 2020).

[24] *Act of October 19, 1980*, Pub. L. No. 96-473, § 2, 94 Stat. 2263 (1980).

APPENDICES

Appendix A – Scope and Methodology

To accomplish our objective, we:

- Reviewed applicable Federal laws, regulations, and sections of the Social Security Administration's (SSA) *Program Operations Manual System* (POMS) related to benefits paid to disability beneficiaries who receive reduced retirement benefits.

- Obtained a data extract from the Master Beneficiary Record of 32,474 beneficiaries who, as of September 5, 2019, (1) had reached full retirement age (FRA), (2) had been entitled to disability benefits and elected to receive reduced retirement benefits, (3) were in current payment status, and (4) were entitled to a higher benefit amount at FRA.

- Reviewed a random sample of 100 beneficiaries to determine whether section 202(q)(7)(F) of the *Social Security Act* gave them a financial advantage. To do so, we reviewed the Master Beneficiary Record, Online Retrieval System, Claims Files User Interface, and Modernized Claims System.[1]

- For each beneficiary who received a financial advantage, we calculated the difference between the amount SSA will pay based on the current law and the amount it would pay if it continued paying reduced benefits. We calculated the difference from the month the beneficiary reached FRA through their estimated date of death.[2]

    - To determine the amounts SSA already paid through September 2019, we used historical information on the Master Beneficiary Record.

    - To determine the amounts SSA would have paid had benefits remained reduced through September 2019, we used SSA's rate computation formula to calculate the reduced benefit amount based on the number of months before FRA the beneficiaries began receiving reduced retirement.

    - To determine the amounts payable after September 2019 under both scenarios, we

        - used actuarial tables from SSA's Office of the Actuary to determine the beneficiary's additional life expectancy,

        - applied the 1.6 percent cost-of-living adjustment for benefits payable in Calendar Year 2020, and

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[1] See Appendix B for our sampling methodology.

[2] Three beneficiaries died after we obtained our data in September 2019 and before we conducted our final review in April 2020. We used these beneficiaries' actual date of death to calculate the difference in benefits paid based on the current law and benefits payable if SSA continued paying reduced benefits.

- applied annual cost-of-living adjustments for benefits payable after Calendar Year 2020 based on the most conservative estimate of future benefit growth from the 2020 Old-Age, Survivors and Disability Insurance Trustees Report.[3]

We conducted our review between March and May 2020 in Kansas City, Missouri. We determined the data used for this audit were sufficiently reliable to meet our objective. The principal entity audited was the Office of Operations. 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 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

[3] The Board of Trustees, Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds, *The 2020 Annual Report of the Board of Trustees of the Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds*, Table V.C1, pp. 118 and 119 (April 2020). The 2020 Old-Age, Survivors and Disability Trustees Report provides estimates for future cost-of-living adjustments for benefits payable through Calendar Year 2030. For benefits payable after Calendar Year 2030, we used the same annual cost-of-living adjustment estimate—1.8 percent—that the report used for Calendar Years 2024 through 2030.

Appendix B – Sampling Methodology and Results

Sampling

We obtained a data file from the Master Beneficiary Record. From this file, we identified 32,474 beneficiaries who, as of September 5, 2019, (1) had reached full retirement age (FRA), (2) had been entitled to disability benefits and elected to receive reduced retirement benefits, (3) were in current payment status, and (4) were entitled to a higher benefit amount at FRA. From this population, we selected a random sample of 100 beneficiaries (see Table B–1).

Table B–1: Population and Sample Size

Sampling Frame	Beneficiaries
Population Size	32,474
Sample Size	100

Sample Findings and Projections

Of the 100 beneficiaries we reviewed, section 202(q)(7)(F) of the *Social Security Act* gave a financial advantage to 89. From FRA through September 2019, the month we obtained our data, section 202(q)(7)(F) required that SSA pay these beneficiaries $1,775,069 more than it would have had it permanently reduced their benefits. Therefore, we project SSA paid 28,902 beneficiaries $576,435,907 more than if section 202(q)(7)(F) did not require that SSA increase their benefits (see Table B–2).

Table B–2: Number of Beneficiaries Advantaged and Difference in Amount of Benefits Received Based on Section 202(q)(7)(F) of the Act, FRA Through September 2019

Description	Number of Beneficiaries	Difference in Amount of Benefits
Sample Results	89	$1,775,069
Projected Quantity/Point Estimate	28,902	$576,435,907
Projection – Lower Limit	26,778	$472,270,172
Projection – Upper Limit	30,428	$680,601,642

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

Through the estimated remainder of their lives, section 202(q)(7)(F) requires that SSA pay 86 of these 89 beneficiaries $2,397,503 more than if their benefits were permanently reduced.[1] We project SSA will pay 27,928 beneficiaries $778,565,124 more than if section 202(q)(7)(F) did not require SSA to increase benefits (see Table B–3).

Table B–3: Number of Beneficiaries Advantaged and Difference in Amount of Benefits Received Based on Section 202(q)(7)(F) of the Act, October 2019 Through Estimated Date of Death

Description	Number of Beneficiaries	Difference in Amount of Benefits
Sample Results	86	$2,397,503
Projected Quantity/Point Estimate	27,928	$778,565,124
Projection – Lower Limit	25,653	$644,401,154
Projection – Upper Limit	29,657	$912,729,094

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

[1] See Appendix A for a discussion on how we calculated additional lifetime benefits.

Appendix C – AGENCY COMMENTS

SOCIAL SECURITY

MEMORANDUM

Date: October 29, 2020 Refer To:

To: Gail S. Ennis
Inspector General

Stephanie Hall

From: Stephanie Hall
Chief of Staff

Subject: Office of the Inspector General Draft Report, "Social Security Beneficiaries Financially Advantaged by Electing to Convert from Disability Benefits to Reduced Retirement Benefits" (A-07-18-50636) – INFORMATION

Thank you for the opportunity to review the draft report. We disagree with the recommendation. We defer to Congress to determine benefit amounts and methods for computing them.

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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