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“Protecting and Improving Social Security: Benefit Enhancements”  
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Chairman Larson, Ranking Member Reed, and members of the Subcommittee, thank you for the opportunity to testify at this hearing. It is an honor and a pleasure to be invited to discuss ways to enhance Social Security benefits for women.

I am currently a Senior Fellow at the National Academy of Social Insurance, a nonprofit, nonpartisan organization made up of the nation’s leading experts on social insurance. Previously, for nearly two decades I served as Vice President for Family Economic Security at the National Women’s Law Center, a nonprofit, nonpartisan organization that works to protect and promote equality and opportunity for women and girls. I directed its program to improve policies important to the economic security of women and their families, including Social Security. However, the views I express today are my own, and should not be taken to represent the views of either the Academy or the National Women’s Law Center.

My testimony today will briefly discuss why improving Social Security is a key strategy for improving retirement security for women and some specific ways that Social Security benefits could be enhanced to help overcome the challenges that women continue to face in achieving a secure retirement.<sup>1</sup> Although my testimony is focused on women, all of the options I describe would be available on a gender-neutral basis and would benefit others who have been disadvantaged in the workplace or face similar challenges.

**Improving Social Security benefits is key to improving women’s retirement security**

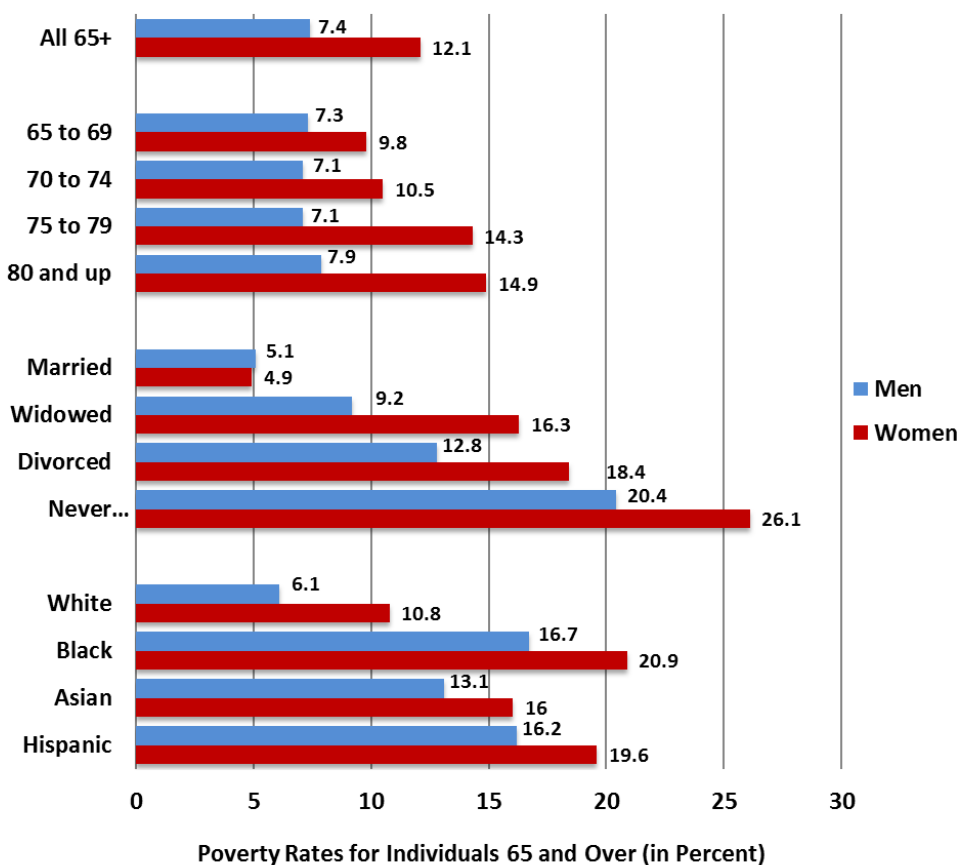
Social Security is the foundation of retirement security for most Americans, but it is especially important for women. Women rely more on income from Social Security than men do, even though women’s Social Security benefits are lower.

The average annual Social Security benefit for women 65 years and older is 79% of men’s (\$13,891 v. \$17,663).<sup>2</sup> Yet Social Security provides 45% of total income for unmarried women 65 and older (widowed, divorced, and never-married), compared to 33% of the income of their male counterparts.<sup>3</sup> And nearly half (46%) of unmarried women 65 and older rely on their Social Security benefits for virtually all (90% or more) of their income.<sup>4</sup>

Social Security is a universal program serving workers and their families across the income spectrum—but it is also the nation’s most effective anti-poverty program.<sup>5</sup> Without income from Social Security, more than four in ten women 65 and older would be poor.<sup>6</sup> But despite Social Security, older women are at greater risk of poverty than their male counterparts—both overall and by age, race, ethnicity, and marital status (except for married women), as Figure 1 shows.<sup>7</sup> Gender is thus a key factor in elderly poverty, although it is not the only one; both men and women of color have higher poverty rates than white women 65 and older.

Figure 1 is based on data using the Census Bureau’s official poverty measure. The Census Bureau also has developed a more comprehensive poverty measure, the Supplemental Poverty Measure (SPM), which takes account of certain out-of-pocket expenses and noncash and after-tax resources received by a household. Poverty rates for seniors are higher using the SPM than the official measure, largely because of out-of-pocket medical expenses. But an analysis of poverty data using the SPM shows the same pattern: women 65 and older are at greater risk of poverty than their male counterparts by age, race, ethnicity, and marital status.<sup>8</sup>

**Figure 1. Poverty Rates for Men and Women, Age 65 and Over**



Source: SSA, Income of the Population 55 and Older, 2014 (2016), Tables 11.1 and 11.2.

Improving Social Security benefits is the most effective way to improve retirement security for women. Its benefits are modest, but its basic structure has multiple advantages for women. Social Security provides secure benefits that can’t be outlived, are not subject to the ups and downs of the stock market or depletion before retirement, and are adjusted annually for inflation—features that are especially important for women because of their longer life spans. Social Security is virtually universal, covering low-wage, part-time, temporary, and self-employed workers, and its benefit formula is progressive—especially important for women who are a large majority of low-wage and part-time workers. It

provides automatic benefits to eligible spouses, surviving spouses, and divorced spouses—benefits available on a gender-neutral basis but relied on by women overwhelmingly.

But Social Security can be made even better. My testimony will outline enhancements to Social Security that can help overcome four of the challenges women face in preparing for a secure retirement: the gender wage gap; unpaid caregiving; changing family structures; and longer life expectancies.

### **1. Addressing the persistent gender wage gap**

Social Security benefits are proportional to lifetime earnings, based on an average of the 35 highest years of earnings. The formula is progressive: workers with low lifetime earnings receive a benefit that represents a higher percentage of their pre-retirement earnings than higher earners do. But workers with higher career-average earnings receive higher benefits, and workers with very low lifetime earnings will receive very low benefits. Nearly four out of ten retired female workers receive a benefit that provides less than a poverty-level income, twice the rate for retired male workers: 38% of retired female workers, compared to 18% of retired male workers, receive benefits below \$950 a month.<sup>9</sup>

Women have greatly increased their participation in the paid labor force and the gap between men and women's wages has narrowed over the past half century. But virtually no progress has been made in closing the gender wage gap over the past decade.<sup>10</sup>

The most recent Census Bureau data show that women in the U.S. who work full time, year round are typically paid only 80 cents for every \$1 paid to their male counterparts, and the wage gap is worse for women of color. Black women working full time, year round, are typically paid 61 cents to every \$1 paid to a white, non-Hispanic male; Latinas, 53 cents.<sup>11</sup>

The adequacy of Social Security benefits for women and other groups of workers with lower lifetime earnings could be improved by adjusting the regular benefit formula so all workers, but especially low- and middle-income earners, receive a boost in their modest benefits and/or reforming the Special Minimum Benefit to ensure that workers with substantial work histories but low earnings do not retire into poverty.

#### *Enhancements to the regular benefit formula*

Adjusting the regular benefit formula to make it more progressive would increase benefits for all workers, but lower lifetime earners, including women and people of color, would receive the largest percentage increases.

The first step in calculating a worker's benefit is to determine his or her career average earnings, based on the average of the 35 years of highest earnings adjusted for wage inflation (Average Indexed Monthly Earnings, or AIME). Next, the benefit formula is applied to determine the basic monthly benefit (Primary Insurance Amount, or PIA—the benefit an individual would receive if he or she began receiving benefits at the Full Retirement Age). Two dollar thresholds, known as bend points, divide the worker's AIME into brackets to calculate the PIA. The formula is progressive: the PIA is the sum of 90% of career average

monthly earnings up to the first bend point (\$926 for 2019); 32% of the amount between the first and second bend point (\$927 and \$5,583 in 2019); and 15% of average earnings above the second bend point up to the maximum amount on which workers pay Social Security tax (\$5,584 to \$11,075 monthly in 2019). The bend points and taxable maximum—but not the percentages—are adjusted every year for average wage growth.<sup>12</sup>

The adequacy of regular Social Security benefits could be enhanced in several ways:

- Increase above the current 90% the percentage applied to the portion of average monthly earnings below the first bend point. This would increase benefits for all beneficiaries, but workers with the lowest average earnings would see the largest percentage increase.
- Raise the first bend point so that more earnings are multiplied by the highest PIA factor (currently 90%). This would increase benefits for all individuals with average monthly earnings above the first bend point, and also would give larger percentage increases to workers with lower average earnings.
- Increase the percentage factor applied to earnings below the first bend point *and* raise the first bend point.

#### *A Meaningful Special Minimum Benefit*

Social Security has an alternative benefit formula, the Special Minimum Benefit (SMB). Instead of being based on average career earnings, the SMB is based on the number of “years of coverage” earned by the worker. It was intended to increase benefits for workers who had low earnings for many years. However, the current SMB is virtually meaningless.

Of 62 million Social Security recipients in 2017, fewer than 40,000 qualified for the minimum benefit, and the Social Security Administration estimates that the SMB will have no effect on workers turning 62 in 2019.<sup>13</sup> It also does little for those who receive it; the average increase in monthly benefits for those who received it in 2013 was about \$46.<sup>14</sup>

The SMB has very stringent eligibility requirements. In 2018, to qualify for one “year of coverage” toward the SMB a worker must earn \$14,310, compared to \$5,280 to earn one year (four quarters) of coverage under the regular formula.<sup>15</sup> A woman working 35 hours a week, 50 weeks a year, at the federal minimum wage of \$7.25 would earn \$12,688—not enough to be credited with a year of coverage toward the SMB—and many low-wage jobs do not even provide such steady employment. A worker must have at least 11 “years of coverage” to receive any benefit from the SMB. Even workers with 30 “years of coverage” who qualify for the maximum SMB would receive a monthly benefit in 2018 of \$849 (\$10,188 annually)<sup>16</sup>—well below the federal poverty guideline of \$12,140 for one person.<sup>17</sup>

The usefulness of the SMB has declined over time primarily because initial SMB benefits are indexed to price inflation, while initial benefits under the regular formula are indexed to the growth in wages, which generally grow faster than prices.<sup>18</sup>

Several adjustments to the SMB would make it a more effective tool for increasing the adequacy of Social Security benefits for lifetime low earners:

- Reduce the earnings needed to earn one “year of coverage” toward the SMB to the same amount required for regular Social Security credits, and allow workers to earn partial credit, as they can under the regular Social Security formula.
- Provide years of credit toward the SMB for years in which a worker was caring for a young child or other family member in need of care up to a certain limit (for example, 8 years). This would be especially helpful for single parents in low-wage jobs who struggle to stay in the workforce because of the high cost of child care and inflexible work arrangements.
- Increase the value of the benefit for workers with 30 years of credit to at least 125% of the federal poverty level for an individual.
- Index initial SMB benefits to wage growth, the way regular benefits are indexed, so that the value of the SMB does not erode over time.

Even a reformed SMB may be insufficient to lift women with shorter careers of low earnings out of poverty. Congress should also consider reforms to the Supplemental Security Income (SSI) program, a means-tested program administered by the Social Security Administration that is intended to provide a basic income floor to poor seniors and adults and children with disabilities who are poor.<sup>19</sup>

## **2. Valuing the work of caregivers**

Women have dramatically increased their work in the paid labor force in the past 50 years, and participate at nearly the same rate as men, but they still shoulder most of the responsibilities of caring for children, elders, and other loved ones. Although men have increased the time they spend caregiving, women still spend twice as much time as men caring for children in the household.<sup>20</sup>

Because of caregiving responsibilities, women are more likely than men to take time out of the paid workforce—working part time or leaving temporarily or permanently. For some, the choice is entirely voluntary. Others are constrained by high child care costs, especially for infants and toddlers, the lack of family leave, and inflexible and unpredictable schedules, especially in the low-wage jobs predominantly held by women.<sup>21</sup> But whatever the reason, women pay an economic price for the unpaid care they provide to others, in immediate lost wages, often lower earnings over time, and fewer resources at retirement.<sup>22</sup>

In contrast to most of the countries in the European Union, the United States does not provide pension credits to individuals who take time out of the paid workforce for the socially and economically vital work of providing care to young children and sick or elderly relatives.<sup>23</sup> The only way Social Security currently provides support to caregivers is indirectly, through spousal benefits. But many single parents and other caregivers do not

qualify for spousal benefits, as discussed in the next section on reforms to address changing family structures.

Retirement security for caregivers could be improved by counting some years of caregiving as “years of coverage” in a reformed Special Minimum Benefit, as described above, and/or providing earnings credits for caregiving in the regular benefit formula, as described below.

#### *Earnings credits for caregiving*

Social Security earnings could be imputed to workers with low or no earnings when they are providing care to a young child or other family member in need of care.

- If earnings in a given year when the worker was providing care were below a certain amount (for example, 50% of the average wage that year), the worker would be credited with additional earnings to bring her or his earnings up to 50% of the average wage. The number of years of caregiving credits would be limited (for example, to five years).

These credits would give the largest proportional increase to workers with lower average earnings, but would also be available to a worker who had, for example, 30 years of high earnings and five years of zero or low earnings because of caregiving.

### **3. Modernizing benefits for today’s family structures**

Today’s families are different from the solo breadwinner model Social Security’s design reflects.<sup>24</sup> Most married women are in the paid labor force and households rely more on both spouses’ earnings. More women, and more mothers, have never married or are divorced without a marriage that lasted 10 years—and are ineligible for Social Security’s spousal benefits. As Figure 1 shows, while poverty rates for all groups of non-married women are three times higher than those for married women, the poverty rate among never-married women is the highest of all.

This is particularly a concern for black women. In 2009, about 34% of black women ages 50-59 did not have marital histories that would make them eligible for spousal benefits, compared to 17% of Hispanic women and 14% of non-Hispanic white women in the same age group.<sup>25</sup> To be equitable, a package of reforms to improve Social Security for women should include improvements to the benefits women earn through their own work in the paid labor force and as caregivers, like those described elsewhere in this testimony, as well as to spousal benefits.

#### *Enhanced survivor benefits for dual-earner couples<sup>26</sup>*

Social Security benefits were designed to provide basic income security for a worker’s family. Workers earn benefits for a spouse that can be worth up to 50% of the worker’s benefit, and up to 100% of the deceased worker’s benefit for a surviving spouse, assuming no reductions for early retirement apply. A spouse who is also entitled to a benefit as a worker (“dually entitled”) can receive the higher of her or his own worker benefit or the

spousal benefit, but not both. Divorced spouses and surviving divorced spouses are eligible for the same benefits as their married counterparts, if they were married for 10 years.

The increase in women's earnings has substantially reduced their reliance on the 50% benefit for spouses. However, the benefit for surviving spouses will continue to be important: an estimated two-thirds of Gen-X wives (born 1966-1978) will outlive their husbands and have lower lifetime earnings, making them eligible for a survivor benefit.<sup>27</sup>

Social Security's spousal benefits were not designed for today's dual-earner couples. Under the current benefit structure, the surviving spouse of a single-earner couple will receive a benefit that is 67% of the couple's combined benefits, assuming both spouses claimed benefits at their Full Retirement Age. The surviving spouse of a couple with equal lifetime earnings will receive a benefit that is 50% of their combined benefits.<sup>28</sup>

The current design of the surviving spouse benefit presents issues of adequacy and equity. While the cost of maintaining a household declines when there is only one person to support, it does not fall by 50% or even 33%. Using the Census Bureau's poverty thresholds as a guide, a one-person elderly household needs 79% of the income of a two-person household to maintain the same standard of living.<sup>29</sup> The more equal the spouses' earnings, the greater the decline in household Social Security income at widowhood. And, if a dual-earner couple and a single-earner couple had the same household earnings and contributed the same amount to Social Security over their working lives, the survivor of the single-earner couple would receive a higher benefit than the survivor in the dual-earner couple.

Benefits for surviving spouses could be made more adequate and equitable by allowing a surviving spouse to benefit from the contributions both have made to Social Security. Surviving spouses could receive the higher of the current law benefit or a new alternative benefit that would:

- Provide a benefit equal to 75% of the sum of the spouses' combined worker benefits. To target the improvement to low- and moderate-income couples, the alternative benefit could be capped (for example, at the benefit a worker with lifelong average earnings would receive, currently, around \$1,600).

Example, Latoya's worker benefit is \$900 a month, and her husband Jamal's is \$1,200. As a widow, under current law Latoya would receive \$1,200; as a widower, Jamal would continue to receive \$1,200. Under this proposal, whichever spouse survived the other would receive \$1,575 a month ( $.75 * [\$1,200 + \$900]$ ).

#### *Enhanced divorced spouse benefits*

Many divorced women do not meet the requirement of a 10-year marriage to be eligible for benefits as a divorced spouse. As of 2009, both the typical first marriage that ended in divorce, and the typical second marriage for women who remarried that ended in divorce, lasted only eight years.<sup>30</sup>

To reduce the poverty rate among older divorced spouses, a reformed divorced spouse benefit could:

- Allow divorced spouses and divorced surviving spouses married five to nine years to receive a partial benefit based on the former spouse's work record.

#### **4. Meeting the challenge of longer life expectancies**

Women, including women of color, face additional years in retirement with fewer resources than men. The average life expectancy at age 65 of women overall is longer than that of men (20.5 years v. 18.0 years). The average life expectancy at age 65 for black women (19.6 years) and Hispanic women (22.6 years) is longer than that of white, non-Hispanic men (18.0 years).<sup>31</sup> And women face additional financial challenges as they age. They are more likely than men to need long-term care, face higher out-of-pocket medical expenses, and live alone.<sup>32</sup> As Figure 1 shows, poverty rates for women as they age increase more dramatically than for their male counterparts: from 9.8% for women 65-69 to 14.9% for women 80 and above v. from 7.3% for men 65 to 69 to 7.9% for men 80 and above.

##### *A Cost of Living Adjustment that reflects seniors' living costs*

The longer a beneficiary lives, the more inflation can erode the value of benefits. Social Security provides an automatic annual cost-of-living adjustment (COLA) that is especially important to women. However, the Consumer Price Index that Social Security uses to determine the COLA, the CPI-W, is based on the spending patterns of urban wage earners. Their consumption patterns are different from those of seniors, who spend twice as large a share of their budgets on health care as the population as a whole.<sup>33</sup> And health care costs have frequently risen at a faster rate than the other costs of goods and services.

To better maintain the purchasing power of Social Security benefits over the long term, Social Security's Cost of Living Adjustment could:

- Be based on an alternative measure of inflation developed by the Bureau of Labor Statistics, the Consumer Price Index for the Elderly (CPI-E), that takes account of the consumption patterns of older individuals, or similar index that more accurately measures the spending patterns of the elderly.<sup>34</sup>

##### *Enhancements for older seniors at risk*

Life expectancy differs by income, education, and race, as well as by gender; individuals of higher socio-economic status tend to live longer.<sup>35</sup> To target improvements to those who need them and maintain the progressivity of Social Security, benefits could:

- Be modestly and gradually increased for long-term beneficiaries with lower benefits, starting around age 80 for seniors and 18 years after eligibility for people with disabilities;



- Provide an increase of the same amount for all eligible retirees in the same cohort, rather than a percentage of the individual's benefit.

## Conclusion

The challenges women face at retirement are rooted in the challenges they face long before they reach retirement. Congress should address those. But enhancing Social Security benefits—as Congress has done many times since Social Security was created—would make a meaningful difference in the lives of millions of women, today and for future generations.

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<sup>1</sup> The options outlined in this testimony draw on a paper by Entmacher, Waid, and Veghte, National Academy of Social Insurance, *Overcoming Barriers to Retirement Security for Women: The Role of Social Security* (Dec. 2016), at <https://www.nasi.org/research/2016/overcoming-barriers-retirement-security-women-role-social-se>, and proposals that have been advanced by policy makers, researchers, and advocates. Many are part of broader plans that also include proposals for increasing revenues that would pay for the improvements and strengthen Social Security's long-term financing.

<sup>2</sup> Social Security Administration, *Fact Sheet: Social Security Is Important to Women* (Aug. 2018), at <https://www.ssa.gov/news/press/factsheets/women-alt.pdf>

<sup>3</sup> Id.

<sup>4</sup> Id.

<sup>5</sup> Romig, Center on Budget and Policy Priorities, *Social Security Lifts More Americans Above Poverty than Any Other Program* (Nov. 2018), at <https://www.cbpp.org/research/social-security/social-security-lifts-more-americans-above-poverty-than-any-other-program>

<sup>6</sup> Id.

<sup>7</sup> Figure 1 from Entmacher, Waid and Veghte, *supra* n. 1.

<sup>8</sup> Morrissey, Economic Policy Institute, *Economic Snapshot: Women Over 65 Are More Likely to Be Poor Than Men, Regardless of Race, Educational Background, and Marital Status* (Mar. 2016), at <http://www.epi.org/publication/women-over-65-are-more-likely-to-in-poverty-than-men/>

<sup>9</sup> Entmacher, Waid and Veghte, *supra* n. 1.

<sup>10</sup> National Women's Law Center, *The Wage Gap: The Who, How, Why and What to Do* (Oct. 2018), at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2018/10/The-Wage-Gap-Who-How-Why-and-What-to-Do-2018.pdf>

<sup>11</sup> Id.

<sup>12</sup> Social Security Administration, *Primary Insurance Amount*, at <https://www.ssa.gov/oact/cola/piaformula.html>

<sup>13</sup> Congressional Research Service (CRS), *Social Security: Minimum Benefits* (Jul. 2018), at <https://www.everycrsreport.com/reports/R43615.html>

<sup>14</sup> Id.

<sup>15</sup> Id.

<sup>16</sup> Id.

<sup>17</sup> U.S. Dep't of Health and Human Services, *2018 Poverty Guidelines*, at <https://aspe.hhs.gov/2018-poverty-guidelines>

<sup>18</sup> CRS, *supra* n. 13.

<sup>19</sup> Center on Budget and Policy Priorities, *Policy Basics: Supplemental Security Income* (Aug. 2018), at <https://www.cbpp.org/research/social-security/policy-basics-supplemental-security-income>

<sup>20</sup> U.S. Dep't of Labor, Bureau of Labor Statistics, *Time spent in primary activities and percent of the civilian population engaging in each activity, averages per day by sex, 2017 annual averages*, Table 1, at <https://www.bls.gov/news.release/atus.t01.htm>

<sup>21</sup> Vogtman and Schulman, National Women's Law Center, *Set Up to Fail: When Low-Wage Work Jeopardizes Parents' and Children's Success* (2016), at <https://nwlc.org/resources/set-up-to-fail-when-low-wage-work-jeopardizes-parents-and-childrens-success/>

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- <sup>22</sup> Glynn and Corley, Center for American Progress, *The Cost of Work-Family Policy Inaction* (Sept. 2016), at <https://cdn.americanprogress.org/wp-content/uploads/2016/09/22060013/CostOfWorkFamilyPolicyInaction-report.pdf>
- <sup>23</sup> Jankowski, *Caregiver Credits in France, Germany, and Sweden: Lessons for the United States*, Social Security Bulletin Vol 71, No. 4 (2011), at <https://www.ssa.gov/policy/docs/ssb/v71n4/v71n4p61.html>
- <sup>24</sup> The “male breadwinner, female homemaker” model was never an accurate description of all families. For example, black women have long had higher workforce participation rates than white women and families have long been more reliant on their contributions.
- <sup>25</sup> Social Security Administration, *Marriage Trends and Women’s Benefits: Differences by Race-Ethnicity and Nativity* (Feb. 2014), at <https://www.ssa.gov/policy/docs/research-summaries/marriage-trends-race-ethnicity.html>
- <sup>26</sup> In this testimony, “benefits for surviving spouses” refers to the retirement benefits that surviving spouses can claim when they reach a certain age. Social Security also provides benefits for surviving spouses of any age if they are caring for a child under age 16. See Social Security Administration, *Benefits Planner: Planning for Your Survivors*, at <https://www.ssa.gov/planners/survivors/onyourown.html>
- <sup>27</sup> Sass, Center for Retirement at Boston College, *How Work & Marriage Trends Affect Social Security’s Family Benefits* (June 2016), at [http://crr.bc.edu/wp-content/uploads/2016/06/IB\\_16-9.pdf](http://crr.bc.edu/wp-content/uploads/2016/06/IB_16-9.pdf)
- <sup>28</sup> Surviving spouses can receive the higher of their own worker benefit or the deceased spouse’s benefit, not both. Assuming no early retirement reductions, in a single-earner couple when both are alive, the spouse receives 50% of the worker’s benefit and the worker receives 100%, for combined household benefits of 150%. The surviving spouse receives 100% of the worker’s benefit, reducing the single-earner household’s Social Security income to 67% of their combined benefit (100/150). In a couple with two equal earners, when both are alive, each receives 100% of their worker benefits, for combined household benefits of 200%. The surviving spouse receives one benefit, reducing this household’s Social Security income to 50% of their combined benefit (100/200).
- <sup>29</sup> Author’s calculations based on U.S. Census Bureau’s preliminary estimates of poverty thresholds for an individual 65 and older (\$12,043) and a two-person household with a householder 65 and older (\$15,190). <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>
- <sup>30</sup> Kreider and Ellis, U.S. Census Bureau, Number, Timing, and Duration of Marriages and Divorces: 2009, Table 8 (2011), at <https://www.census.gov/prod/2011pubs/p70-125.pdf>
- <sup>31</sup> Arias and Xu, Centers for Disease Control, *United States Life Tables, 2015* (Aug. 2018), at [https://www.cdc.gov/nchs/data/nvsr/nvsr67/nvsr67\\_07-508.pdf](https://www.cdc.gov/nchs/data/nvsr/nvsr67/nvsr67_07-508.pdf)
- <sup>32</sup> Entmacher, Waid and Veghte, *supra* n. 1.
- <sup>33</sup> Munnell and Chen, Center for Retirement Research at Boston College, *Do We Need a Price Index for the Elderly?* (2015), at [http://crr.bc.edu/wp-content/uploads/2015/10/IB\\_15-18.pdf](http://crr.bc.edu/wp-content/uploads/2015/10/IB_15-18.pdf)
- <sup>34</sup> *Id.*
- <sup>35</sup> Sanzenbacher, Webb, Orlova, and Cosgrove, Center for Retirement Research at Boston College, *Does a Uniform Retirement Age Make Sense?* (2016), at [http://crr.bc.edu/wp-content/uploads/2016/01/IB\\_16-1.pdf](http://crr.bc.edu/wp-content/uploads/2016/01/IB_16-1.pdf)