



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

Evaluation Report

The Social Security Administration's
Use of the Treasury Offset Program

A-04-14-14104 | July 2015

OIG Office of the Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: July 2, 2015

Refer To:

To: The Commissioner

From: Inspector General

Subject: The Social Security Administration's Use of the Treasury Offset Program (A-04-14-14104)

The attached final report presents the results of our review. Our objective was to determine whether the Social Security Administration complied with laws and policies when it used the Treasury Offset Program to collect Federal debts that were delinquent 10 years and longer.

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



Patrick P. O'Carroll, Jr.

Attachment

The Social Security Administration's Use of the Treasury Offset Program

A-04-14-14104



July 2015

Office of Audit Report Summary

Objective

To determine whether the Social Security Administration (SSA) complied with laws and policies when it used the Treasury Offset Program (TOP) to collect Federal debts that were delinquent 10 years and longer.

Background

SSA administers several benefit programs, including the Old-Age, Survivors and Disability Insurance and Supplemental Security Income programs. The benefit amount payable to an individual under these programs depends on various factors. A change in one or more of these factors may result in a lower or no benefit payable to the individual. In these situations, until SSA learns of the change and adjusts the benefit, the individual is paid more than he/she is entitled to receive—an overpayment.

In October 2011, in response to a change in Federal law, SSA published regulatory changes that authorized referrals of delinquent debts 10 years and older to the Department of the Treasury (Treasury) for recovery through TOP. In June 2012, SSA began mailing notices to affected debtors informing them of the planned TOP action to collect their SSA debt. In April 2014, newspaper articles reported that individuals' Federal or State tax returns had been offset without any notice from SSA. SSA immediately halted its referrals pending a review of its process.

Findings

Our review found that SSA properly referred delinquent debts 10 years and older to Treasury, as provided for under current laws and regulations. SSA's External Collection Operation (ECO) system also correctly selected and referred debts to Treasury according to its policies and procedures and prevented the selection of 700 debts because of discrepancies in SSA benefit records.

For those debts referred to Treasury, SSA mailed debtors a pre-offset notice to the last known address in the Agency's records, as authorized by Treasury regulations. However, of the 264,558 10-year and older delinquent debts referred to Treasury, 7,580 (2.9 percent) debtors had a TOP offset after the U.S. Postal Service returned the debtors' pre-offset notices as undeliverable. For these debtors, the offset occurred because SSA experienced delays in recording the undeliverable notice information into its system. SSA took action to contact affected debtors and offered a refund of their offset.

For the 152,462 initial pre-offset notices returned to SSA as undeliverable, SSA requested an updated address from its address verification contractor. Before SSA resumes its referral of delinquent debts 10-years and older, it needs valid addresses for 67,789 debtors and needs to mail an initial pre-offset notice to 76,747 debtors. SSA stated it will seek a valid address, if it decides to resume referring the delinquent 10-year and older debts to TOP. Moreover, the pre-offset notices for these debts contained limited information about the debt. We believe that the information was insufficient for the debtor to recall the debt and the circumstances surrounding the debt.

Recommendations

We recommended that SSA (1) continue monitoring its implemented process change to obtain addresses from its contractor before sending the TOP pre-offset notice; (2) explore revising the TOP pre-offset notice to better explain the overpayment and when the overpayment was first established; and (3) resolve the record discrepancies for the 700 debts to ensure eligible debts are potentially selected by ECO and referred to TOP.

SSA agreed with all three of our recommendations.

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ABBREVIATIONS

C.F.R.	Code of Federal Regulations
ECO	External Collection Operation
H.R.	House of Representatives
MBR	Master Beneficiary Record
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
OQR	Office of Quality Review
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
ROAR	Recovery of Overpayments, Accounting and Reporting
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
SSR	Supplemental Security Record
STAT.	Statutes at Large
TOP	Treasury Offset Program
Treasury	Department of the Treasury
TRO	Tax Refund Offset
U.S.C.	United States Code

OBJECTIVE

Our objective was to determine whether the Social Security Administration (SSA) complied with laws and policies when it used the Treasury Offset Program (TOP) to collect Federal debts that were delinquent 10 years and longer.

BACKGROUND

SSA administers several benefit programs, including the Old-Age, Survivors and Disability Insurance (OASDI) and the Supplemental Security Income (SSI) programs.¹ The benefit amount payable to an individual under these programs depends on various factors. A change in one or more of these factors may result in a lower or no benefit payable to the individual. In these situations, until SSA learns of the change and adjusts the benefit, the individual is paid more than he/she is entitled to receive—an overpayment.²

When SSA finds it has overpaid an individual, it first attempts to fully and immediately recover the overpayment.³ If these efforts fail, SSA offsets the overpayment against any current and future benefit payments, as appropriate.⁴ For those SSA debtors who are not receiving benefits, SSA may also attempt to collect the debt using such external collection tools as reporting the delinquent debt to credit bureaus, administrative wage garnishment, and Federal payment offset.⁵ SSA uses TOP, administered by the Department of the Treasury (Treasury), to collect debts through a Federal payment offset. TOP enables Treasury to recover individuals' delinquent Federal debt by offsetting it against their individual Federal income tax refund or withholding other Federal or State payments.⁶

¹ SSA provides benefits to eligible individuals under Titles II and XVI of the *Social Security Act*. The Title II program covers workers and their dependents or survivors, while the Title XVI program covers eligible individuals with limited income and resources. See *Social Security Act* §§ 201 *et seq.* and 1601 *et seq.*; 42 U.S.C. §§ 401 *et seq.* and 1381 *et seq.*

² An overpayment is the total amount an individual received for any period that exceeds the total amount that should have been paid for that period. SSA, POMS GN 02201.001 (July 20, 2010).

³ SSA, POMS GN 02210.150 A (October 16, 2008).

⁴ SSA, POMS SI 02220.010 A.1 (July 28, 2010) and GN 02201.009 A and B (July 16, 2012).

⁵ *Debt Collection Act of 1982*, Pub.L. No. 97-365, 96 Stat. 1749 (1982) and *Debt Collection Improvement Act of 1996*, Pub. L. No. 104-134 and 110 Stat. 1321.

⁶ Other Federal payments withheld, which are considered administrative offsets, may include reimbursement to Federal employees for travel and expense reimbursements, Office of Personnel Management pensions, Federal contractor payments, and State income tax refunds.

Federal Law Authorizing Collection of Old Debt

In June 2008, Federal law went into effect that generally no longer prevents Federal agencies from referring debts delinquent 10 years and longer to Treasury for offset.⁷ Section 14219 of the *Food, Conservation, and Energy Act of 2008* amended the prior law by effectively eliminating the 10-year statute of limitations.⁸ In October 2011, SSA published regulatory changes authorizing the referral of delinquent 10-year and older debts to Treasury for recovery through TOP, which includes Federal or State Tax Refund Offsets (TRO).⁹ In June 2012, SSA began a staggered mailing of written pre-offset notices to the affected debtors.

SSA's Process for Notifying Debtors

SSA's External Collection Operation (ECO) system identifies debts that can be collected through TOP and manages the external debt collection process. ECO also sends a pre-offset notice¹⁰ to the debtor's most current address in Agency records. For those debtors selected for TOP,¹¹ the pre-offset notice provides information about the debt, advises of a possible offset action to recover the outstanding overpayment, and explains options available to resolve the debt. Debtors have 60 days to contact SSA to resolve or protest the debt.¹² If, within 60 days, the debtor does not contact SSA and the U.S. Postal Service does not return the notice as "undeliverable," SSA's ECO system refers the debt to Treasury. However, if, within 60 days, the notice is returned as undeliverable, ECO automatically stops the debt from being referred to Treasury. Then, SSA's systems will query the Agency's contractor's database for a valid¹³ address. If the contractor provides a valid address, SSA re-mails another pre-offset notice, and the 60-day period starts anew. If the contractor does not provide a valid or updated address, SSA's systems will continue requesting an address until the notice is not returned undeliverable.¹⁴ Finally, if a pre-offset

⁷ 31 U.S.C. § 3716(e).

⁸ Pub. L. No. 110-246 § 14219, 122 STAT. 2244-2245.

⁹ Federal Register, Volume 76, Issue 203, October 20, 2011.

¹⁰ See Appendix A for a sample pre-offset notice.

¹¹ ECO also identifies and manages debtors selected for administrative offset, credit bureau referral, administrative wage garnishment, and Federal salary offset. ECO sends various types of notices based on the type of debt (OASDI or SSI) and the type of eligible TOP collection tool. Our review focused on SSA's criteria for selecting an OASDI and SSI debtor for offset of a Federal or State tax refund.

¹² To resolve or protest an overpayment, the debtor may pay the debt in full, make regular installment payments under an agreement with SSA, request that SSA waive the debt, provide evidence showing that he/she does not owe all or part of the overpayment, or prove SSA does not have the right to collect the debt. SSA, POMS GN 02201.030 A.3 (February 11, 2014) and SI 02220.012 A.4 (April 10, 2014).

¹³ SSA uses a contractor to obtain valid addresses. The contractor provides SSA the most current address available in its database. SSA considers the contractor's address valid when it is different from the address in SSA's record, is not a foreign address, and the address contains data expected in a typical address format.

¹⁴ If SSA cannot obtain a current address from its contract address provider, its systems will automatically query the contractor's database, every 6 months, for a more current address.

notice is returned undeliverable after the debt has been referred to Treasury but before a TRO occurred, ECO notifies Treasury to stop the TRO action on the debt.

To reduce the number of initial pre-offset notices returned undeliverable, SSA explored options for obtaining more reliable address information. In February 2015, SSA changed its TOP notification process to obtain addresses from its contractor before mailing the pre-offset notice.

Newspaper Headlines and SSA's Halting Its Referral of Old Debt

In April 2014, newspaper articles reported that individuals' Federal or State tax returns had been offset, without any notice from SSA, to collect an old SSA debt. The newspaper articles described situations in which individuals received excess survivor or disability benefits over 30 years ago. The newspaper articles also reported that several individuals had stated they were unaware of the old debt. In one case, an individual alleged that SSA notified him of an overpayment in 1978—when he repaid the debt. However, 36 years later, without notice, SSA offset his State tax refund. He stated that SSA insisted a debt remained but could not provide documentation. The news articles also discussed that some debtors reported they did not directly receive benefits because they were children on a parent's record.¹⁵ In addition, a news article questioned why only certain individuals were selected for an offset when there were multiple beneficiaries on a benefit record.

Because of the allegations, on April 14, 2014, SSA's Acting Commissioner publicly ordered an immediate halt of further referrals to TOP for delinquent 10-year and older debts, pending the Agency's thorough review of the process. The Acting Commissioner also encouraged individuals who believed they had been incorrectly assessed an overpayment to contact the Agency for an explanation or seek options to resolve the overpayment.

SSA's Internal Review of Its Selection and Referral of Old Debt

In response to the Acting Commissioner's directive, SSA initiated a review to determine whether it was properly identifying and selecting its 10-year and older delinquent debts. The review also included determining whether SSA complied with current laws and regulations as well as its policies and procedures when referring the delinquent 10-year and older debts to Treasury. Finally, as part of the review, SSA's Office of Quality Review (OQR) randomly selected and tested (for various attributes) a sample of debts SSA referred to Treasury under TOP.¹⁶ OQR's

¹⁵ SSA's policy prohibits children under age 15 from directly receiving payments. For these individuals, SSA appoints a representative payee. However, under certain conditions, SSA may directly pay a child between ages 15 and 17. At age 18, SSA will pay the individual directly if they are eligible to continue receiving benefits and there is no evidence suggesting the individual is incapable of managing or directing the management of his/her own benefits. SSA, POMS GN 00502.005 A (June 25, 2014), GN 00502.070 A (July 12, 2005), and GN 00502.010 (February 25, 2003).

¹⁶ OQR tested a random sample of 250 (218 OASDI and 32 SSI) debtors SSA referred to Treasury for TOP. OQR selected its sample from a population of 237,605 debts SSA referred to Treasury for TOP.

test of criteria for identifying and selecting debts for referral to Treasury found that SSA correctly applied and complied with laws, regulations, and policies and procedures.

Additionally, OQR’s tests found, for 70 percent of the OASDI debtors, the overpayment occurred because children on the wage earner’s record lost their eligibility for benefits because they were no longer full-time students. Before April 1985, children of a deceased worker or a retired/disabled beneficiary who were full-time, post-secondary students were entitled to OASDI benefits until they reached age 22.¹⁷ After April 1985, Federal law terminated OASDI benefits to post-secondary students over age 18.¹⁸ OQR’s tests found, for the majority (53 percent) of the SSI debtors, the overpayment occurred because of excess income or resources.

10-Year and Older Delinquent Debts SSA Identified for TOP

As of April 2014, SSA had identified 372,838 10-year and older delinquent debts eligible for TOP in June 2012 and later. Of these debts, SSA referred 264,558, totaling about \$564 million, to Treasury for TOP. During this period, there were 68,498 TOP offsets, totaling about \$48 million. Table 1 details the status of the delinquent 10-year and older debts eligible for TOP.¹⁹ As of May 2015, SSA had not issued a decision as to whether it will resume referring delinquent 10-year and older debts for a possible Treasury offset.

Table 1: Status of SSA’s 10-Year and Older Delinquent Debts Identified for TOP

Status	OASDI Debts	SSI Debts	Totals
Referred to Treasury—Pre-offset Notice was not Returned Undeliverable Within 60 days	240,975	23,583	264,558
Pre-Offset Notice Returned Undeliverable—Debt Not Referred to Treasury	19,280	12,253	31,533
Subtotals	260,255	35,836	296,091
Pending—Pre-offset Notice Not Yet Mailed to Debtor	34,721	42,026	76,747
Totals	294,976	77,862	372,838

Source: SSA’s Office of Systems provided its data files of OASDI and SSI 10-year and older delinquent debts identified for TOP.

¹⁷ *Social Security Amendments of 1965: Summary and Legislative History*; H.R. 6675, Pub. L. No. 89-97, signed July 30, 1965.

¹⁸ See *Omnibus Budget Reconciliation Act of 1981, Social Security Act* § 202 (d); 42 U.S.C. § 402 (d); and 20 C.F.R §§ 404.350, 404.352, and 404.367.

¹⁹ The data in Table 1 were as of April 2014, when SSA stopped further referrals to TOP for delinquent 10-year and older debts. Because information on individual debtors can change, our review reflects SSA’s benefit records at the time of our analysis.

To accomplish our objective, we interviewed SSA officials and reviewed pertinent laws and regulations as well as Agency policies and procedures. Additionally, we performed various tests on the 10-year and older delinquent debts that SSA referred, and were pending referral, to Treasury for TOP. We performed these tests to determine whether the Agency complied with laws and its policies when selecting and referring these debts to Treasury. For our review, we focused on SSA's criteria for selecting an OASDI and SSI debt for offset of a Federal or State tax refund. We also tested debts for those debtors whose pre-offset notices were returned to SSA as undeliverable. Appendix B provides more detail regarding our scope and methodology.

RESULTS OF REVIEW

Our review found that SSA properly referred the delinquent 10-year and older debts to Treasury for TOP, as allowed under current laws and regulations. Our review also found SSA's ECO system correctly selected and referred debts to Treasury according to its policies and procedures and prevented the selection of 700 debts because of discrepancies in SSA's records. SSA also selected only qualified debts on OASDI records for TOP. Specifically, we found when there were multiple debtors, including multiple auxiliaries,²⁰ on a numberholder's OASDI record, SSA only selected the 10-year and older delinquent debt that qualified for TOP. However, SSA stated it was focusing its efforts on exploring policy or legislative changes to limit TOP for childhood beneficiaries. Additionally, for those debts referred to Treasury for TOP, SSA mailed the debtors a pre-offset notice informing them of the SSA debt and possible TRO.

Of the 264,558 10-year and older delinquent debts SSA referred to Treasury, 7,580 (2.9 percent) debtors had a TOP offset, although the U.S. Postal Service returned an undeliverable notice to SSA. The TOP offset occurred because SSA experienced delays in recording undeliverable notice information into ECO. Had SSA recorded all of the undeliverable information timely, it would not have referred the debt to Treasury, and the TOP offset would not have occurred. SSA explained that, when it became aware of the delays, it took action to eliminate the backlog of un-scanned undeliverable notices. Also, SSA took action to contact affected debtors and offered a refund of their offset.

SSA mailed an initial pre-offset notice to 296,091 debtors. Almost 52 percent of the initial pre-offset notices were returned to SSA as undeliverable. According to SSA, because many of these debtors had not received benefits for some time, the benefit record contained outdated addresses. For these undeliverable notices, SSA's systems queried the contractor's database for the most recent address. Before SSA stopped further referrals of the delinquent 10-year and older debts, the contractor provided a valid address for about 56 percent of the undeliverable notices.

²⁰ Auxiliary beneficiaries are children, widows, spouses, and parents who receive OASDI benefits based on another wage earner's Social Security record.

Because SSA halted referring additional 10-year and older delinquent debts to TOP, SSA had not mailed an initial pre-offset notice to about 77,000 debtors. SSA stated it would seek a valid address for those debtors that it does not have a current address or has not mailed an initial pre-offset notice if it decides to resume referring the delinquent 10-year and older debts to TOP. According to SSA, it has explored options for obtaining more reliable address information. SSA told us, effective February 28, 2015, it began obtaining addresses from its contractor before it mails any pre-offset notices. Table 2 details the status of the pre-offset notices.

Table 2: Status of SSA’s Pre-offset Notices

Status	Number of Notices	Percent
Pre-offset Notice Mailed to Debtor	296,091	100%
• Pre-offset Notice <u>Not Returned</u> as Undeliverable	143,629	48.5
• Pre-offset Notice <u>Returned</u> as Undeliverable	152,462	51.5
Pre-offset Notice <u>Returned</u> as Undeliverable	152,462	100%
• Valid Address Obtained from Contractor	84,673	55.5
• SSA Lacks a Valid Address	67,789	44.5

Source: SSA

Because of the age of these 10-year and older delinquent debts, for some debtors, SSA’s records did not contain the overpayment notice sent debtors when their overpayments were first established. According to SSA, it did not start capturing an image of the initial overpayment notice until the inception of the Online Notice Retrieval System in November 1998. However, for all debts, SSA’s beneficiary records detail how and when the overpayment occurred and when SSA sent the debtor an overpayment notice. SSA recognized that, because of the age of these debts, many debtors may not remember the circumstances that resulted in the overpayment. As such, SSA issued instructions on how staff should respond to calls concerning these debts and directed staff to use the information in SSA’s electronic records to provide the debtors with evidence of when and how the overpayment occurred. As of April 2014, of the 296,091²¹ debtors who were mailed a pre-offset notice, 7,382 (2.5 percent) had protested the debt or received a waiver from SSA.

The pre-offset notice SSA issued to the debtor for these 10-year and older delinquent debts contained limited information about the debt and may have been insufficient for the debtor to recall the debt or the circumstances surrounding the debt. Appendix A provides an example of SSA’s pre-offset notice. SSA has not made a final decision regarding its process for contacting, or recontacting, debtors should it resume its TOP collection efforts. SSA further stated it was

²¹ This number equals 264,558 debts referred to Treasury plus the 31,533 pre-offset notices returned as undeliverable, as shown in Table 1.

focusing its efforts on exploring policy or legislative changes to limit TOP for childhood beneficiaries.

SSA Selected and Referred Debts to TOP as Provided for Under Current Laws and Regulations and According to Policies and Procedures

Our review found that SSA properly referred its 10-year and older delinquent debts to Treasury for TOP, as provided for under current laws and regulations. SSA's ECO system also correctly selected and referred debts to Treasury according to its policies and procedures and prevented the selection of 700 debts due to discrepancies in SSA benefit records. The debts SSA selected met the following main criteria.

- Debtor was alive.
- Debtor was at least 18-years-old when the debt was established²² on SSA's records.
- Debtor was not currently entitled to, or eligible for, benefits.
- Debt was \$25 or more.
- Payment on the debt was delinquent (60 days after the date the debt was established or the initial overpayment notice date).

Moreover, SSA's ECO system only selected qualified debts on OASDI records for TOP. Specifically, when a numberholder's OASDI record had multiple auxiliaries with debts, we found ECO only selected the 10-year and older delinquent debt that qualified for TOP. However, SSA stated it was focusing its efforts on exploring policy or legislative changes to limit TOP for childhood beneficiaries.

Also, for those debts SSA selected for TOP, SSA records indicated it mailed the pre-offset notice to the affected debtors to inform them of the debt, the possible TRO, and options for resolving the debt.

Finally, we performed various tests to determine whether ECO properly selected and referred the OASDI and SSI debts according to SSA's criteria for a TRO. Based on SSA's clarification and explanation of additional SSA selection criteria, we found ECO's functional requirements properly selected and referred debts to Treasury. Further, ECO's functional requirements prevented SSA from selecting 700 additional debts for TOP. SSA explained, to prevent selection and referral of potentially inaccurate debts to TOP, ECO will not select a debt when it identifies

²² When SSA discovers an overpayment, it establishes the debt on the benefit record. In some situations, an individual may have incurred the debt prior to age 18. However, SSA may not discover and establish the overpayment to the beneficiary's record until after he or she reaches age 18.

discrepancies in SSA's records. For most of the 700 debts not selected for TOP, the debtor's overpayment balance as shown in SSA's Recovery of Overpayments, Accounting and Reporting (ROAR) system did not agree with the overpayment balance on the beneficiary's Master Beneficiary Record (MBR) or the MBR displayed the same Social Security number (SSN) for the debtor and another beneficiary.

If SSA resumes its referral and collection of 10-year and older delinquent debts, we believe SSA should resolve the record discrepancies for the 700 debts to determine whether they are potentially eligible for TOP. By resolving the discrepancy, SSA will ensure all debtors on a record with an eligible 10-year and older delinquent debt, are promptly identified, notified, and referred to TOP, if TOP selection eligibility continues.

Some Debts Had a TRO Without Debtors Receiving Proper Notice

Of the 264,558 10-year and older delinquent debts SSA referred to Treasury for a TOP offset, 7,580 (2.9 percent) debtors²³ did not receive SSA's pre-offset notice. Although SSA mailed these debtors a pre-offset notice, the U.S. Postal Service returned the notice to SSA as undeliverable.

The TOP offset occurred because SSA experienced delays in recording the undeliverable notice information in its ECO system. When SSA records an undeliverable notice, ECO suspends referral of the debt to Treasury until SSA obtains a valid address. However, if SSA does not record the undeliverable notice before the 60-day response period, ECO refers the debt to Treasury. Because of the delays, SSA recorded the undeliverable notice information after the 60-day response period and after it referred the debt to Treasury.²⁴ Had SSA recorded the information timely, the TOP offsets would not have occurred.

SSA first became aware that TOP offsets were occurring even though debtors had not received pre-offset notices when its field offices and National 800-Number Network received telephone calls from the affected individuals. The debtors stated they received a notice from Treasury²⁵ indicating their Federal or State tax refund would be offset to recover a delinquent SSA debt (about which they allegedly had no knowledge). SSA determined the U.S. Postal Service had

²³ SSA identified 7,128 debtors with a TOP offset although the pre-offset notice was returned undeliverable. Some debtors had multiple offsets. For these debtors, there were 8,105 offsets. SSA identified the affected debtors by comparing the "undeliverable" notice date to the date it received an offset remittance from Treasury. Our test identified an additional 452 debtors. Our tests of the MBR and ECO data compared the date SSA recorded the pre-offset notice as "undeliverable" to the date Treasury notified SSA that a TOP offset occurred. SSA agreed with our methodology and stated we correctly identified the 452 debtors.

²⁴ If a pre-offset notice is returned undeliverable after the debt has been referred to Treasury but before a TRO occurred, ECO will notify Treasury to stop the TRO action on the debt.

²⁵ Treasury also notifies the debtor of the offset on or before the date the payment is normally due. This notice tells the debtor the payment was offset to repay (in whole or in part) a delinquent debt owed to a Federal agency (also known as a creditor agency). Treasury notifies the Federal agency about the offset via TOP. Treasury's notification is automated and results in an update to the MBR, Supplemental Security Record (SSR) and ECO.

returned an unusually high number of pre-offset notices as undeliverable. SSA also stated that the Government-wide furlough from October 1 through October 17, 2013 contributed to the backlog of un-scanned undeliverable pre-offset notices. As a result, SSA experienced delays in electronically scanning the returned notice information into ECO. SSA's average time to receive and scan returned notices increased from 45 days to longer than 100 days, which is beyond the 60-day response period that SSA allows before it refers a debt to Treasury. SSA explained that, when it became aware of the delays, it took action to eliminate the backlog of un-scanned undeliverable notices. However, because of the scanning delays, ECO did not prevent SSA from referring these debts to Treasury and the subsequent TOP offsets.

SSA has offered the 7,580 debtors the opportunity to have their offset refunded with the understanding that electing the refund does not eliminate the overpayment. For debtors who request and receive a refund, SSA reestablishes the debt on their SSA record. Unless an individual takes action to resolve the overpayment, SSA will begin collection actions when the debt becomes delinquent. As of November 4, 2014, SSA had issued 1,109 refunds, totaling about \$767,000, to these debtors.

Better Address Information May Reduce the Number of Undeliverable Pre-offset Notices

Before the Acting Commissioner's April 14, 2014 directive to stop the Treasury referrals, SSA had mailed pre-offset notices to 296,091 debtors.²⁶ However, the U.S. Postal Service returned to SSA 152,462 (51.5 percent) of these initial notices as undeliverable. For the undeliverable notices, SSA requested an updated address from its address verification contractor. Following is the status of the 152,462 undeliverable notices and actions SSA had taken.

- For 84,673 (55.5 percent), SSA's contractor found a valid address, SSA reissued the notice, and the notice was not returned as undeliverable.
- For 16,762 (11 percent), SSA's contractor found a valid address, and SSA reissued the notice. However, the reissued notice was returned as undeliverable.
- For 36,189 (23.7 percent), SSA's contractor did not find a valid address.
- For 14,838 (9.7 percent), SSA had not yet requested an updated address from the contractor.²⁷

²⁶ As shown in Table 1, SSA referred only 264,558 debts to Treasury for a TOP offset.

²⁷ Because of the halt of further referrals to TOP for the delinquent 10-year and older debts, SSA had not requested an updated address from the contractor.

SSA’s policies and procedures require that the Agency use debtors’ addresses in the MBR²⁸ or SSR²⁹ to mail the pre-offset notice. Furthermore, 31 C.F.R. § 285.2 (d)(2)(i) indicates that Federal agencies may use the current address information on their record to attempt to notify debtors. Only when the U.S. Postal Service returns notices as undeliverable does SSA query its contractor’s database for a valid address (SSA pays a fee for this service). At the time of our review, SSA did not have valid addresses for 67,789³⁰ (22.9 percent) of the 296,091 debtors who were initially mailed a pre-offset notice. If SSA decides to resume referring the delinquent 10-year and older debts to TOP, SSA stated it would seek an updated address for those debts that still meet the eligibility criteria for referral to TOP.

SSA is aware that, for these 10-year and older delinquent debts, its system of records may not contain debtors’ current addresses, which may result in a high number of undeliverable pre-offset notices. As such, if SSA resumes its TOP collection efforts for the 10-year and older delinquent debts that it has not yet referred to Treasury and for those already referred but the TOP action was halted, it will need to issue or re-issue a pre-offset notice to 144,536 debtors, provided the debts continue to meet the TOP criteria. Table 3 details the status of debtors who have not received a pre-offset notice.

Table 3: Status of Debtors Who Have Not Received SSA’s Pre-offset Notice

Status	Number of Debts
Pre-offset Notice Not Yet Mailed to Debtor	76,747
Pre-offset Notice Was Undeliverable After Using Updated Address from the Contractor	16,762
Pre-offset Notice Was Undeliverable and Contractor Did Not Have an Updated Address for Debtor	36,189
Pre-offset Notice Was Undeliverable and SSA had Not Yet Requested an Updated Address from Contractor	14,838
Total	144,536

Source: SSA

²⁸ SSA establishes an MBR for each Title II claimant. The MBR maintains pertinent information needed to accurately pay benefits to the claimant and all entitled dependents. The information SSA maintains on the MBR includes name, SSN, date of birth, address; type and date of disability; and monthly Disability Insurance benefit.

²⁹ SSA establishes an SSR for each Title XVI recipient. The SSR maintains pertinent information needed to accurately pay benefits to the SSI recipient and eligible dependents. The information SSA maintains on the SSR includes name, SSN, date of birth, date of death, and address; payment status; income and resource information; computation and payment history; and overpayment data.

³⁰ This equals 16,762 plus 36,189 plus 14,838, as shown in the above bullets.

SSA told us it had explored options for obtaining more reliable address information. SSA recently completed a comparative review of its process using its current address provider and the process of obtaining address information from Treasury.³¹ SSA found that the process to use its address verification contractor was more efficient and provided a higher percentage of reliable addresses. SSA also noted that its contractor obtained addresses from multiple sources whereas Treasury obtained addresses from only one source, the taxpayer. Based on its comparison, SSA determined it was neither feasible nor cost-effective to use Treasury addresses when mailing TOP pre-offset notices. SSA told us, effective February 28, 2015, it began obtaining addresses from its contractor before it mailed any pre-offset notices. SSA believed this change would allow the Agency to reach a higher percentage of debtors on its initial attempt to notify them of a potential offset. SSA also stated it had successfully obtained updated addresses before mailing a notice while contacting the 7,580 debtors whose debts were offset without receiving a pre-offset notice. Of the notices released, less than 12 percent was returned undeliverable. SSA told us, in a subsequent mailing to additional debtors, it experienced a 5-percent undeliverable mail return rate. We did not verify SSA's results.

Because the Agency lacked a valid address for about 68,000 of the 10-year and older delinquent debts and had not yet mailed a pre-offset notice to about 77,000 debtors, we believe SSA should continue monitoring its revised process for obtaining valid addresses. By closely monitoring the change, SSA can determine whether it is achieving a similar success rate as seen when contacting the 7,580 debtors. If a comparable or improved success rate is not achieved, SSA should explore other options for obtaining more current addresses.

Providing Debtors with Additional Debt Information in Pre-offset Notices

Because of the age of these 10-year and older delinquent debts, for some debtors, SSA's records did not contain the overpayment notice sent debtors when their overpayments were first established. According to SSA, it did not start capturing an image of the initial overpayment notice until the inception of the Online Notice Retrieval System in November 1998. However, for all debts, SSA's beneficiary records contained detailed information to establish how and when the overpayment occurred. Further, the Agency stated for older OASDI debts, information in its ROAR system may be used to determine an overpayment notice date. SSA told us its systems generated an overpayment notice on the date the overpayment was posted to the ROAR and dated the notice 5 days later to allow for mailing. For SSI debts, the SSR contains the type of overpayment notice and overpayment notice date.

³¹ For most SSN owners, SSA obtains address information to mail *Social Security Statements* from the Internal Revenue Service's taxpayer Individual Master File. This file is the largest available database that can be accessed by SSN, and which has addresses provided by taxpayers themselves, generally at least yearly. SSA, POMS RM 01305.001.C.4 (May 1, 2013).

SSA recognized that, because of the age of these debts, many debtors may not remember the circumstances that resulted in the overpayment. When ECO began notifying affected debtors of a possible debt recovery through TOP, the number of years delinquent ranged from 10 to 48 years. See Table 4 for the age of debt stratification.³²

Table 4: Age of SSA’s 10-Year and Older Delinquent Debts Referred to Treasury

Years Delinquent	OASDI Debts Referred	SSI Debts Referred	Total Debts Referred	Percent of Total Debts Referred
10 to 20 Years Delinquent	47,468	23,570	71,038	26.9
21 to 30 Years Delinquent	100,302	13	100,315	37.9
31 to 40 Years Delinquent	92,973	0	92,973	35.1
41 to 50 Years Delinquent	232	0	232	0.1
Totals	240,975	23,583	264,558	100.0%

Source: SSA

SSA expected that debtors who received the pre-offset notice may request additional information about the debt, protest the debt because they believed the debt was not valid, or ask SSA to waive the debt. SSA issued instructions to staff on how to respond to calls concerning these debts. The instructions stated that staff should use the information in SSA’s electronic records to provide the debtors with evidence of when and how the overpayment occurred.

As of April 11, 2014, of the 296,091 debtors who were mailed a pre-offset notice, 7,382 (2.5 percent) protested the debt or received a waiver from SSA. Specifically, about

- 3,135 (1.1 percent) filed a protest (includes those who requested additional information), and
- 4,247 (1.4 percent) received a waiver for the debt.

SSA recently issued an Administrative Message reminding staff how to thoroughly explain the overpayment.³³

The pre-offset notice SSA issued to the debtor for these delinquent 10-year and older debts contained limited information about the debt (see Appendix A for a sample pre-offset notice). Specifically, regarding the overpayment, the pre-offset notice states, “When you received Social Security benefits in the past on the above claim number, you were overpaid (amount).” We believe this information is not sufficient for the debtor to recall the debt and the circumstances

³² To determine the age of a debt we compared the delinquency date in ECO to June 2012 (the month SSA began mailing pre-offset notices to affected debtors). For certain debts, when we could not use the ECO delinquency date, we compared the date SSA established the debt or the notice date of the oldest unpaid debt to June 2012.

³³ SSA, Administrative Message – 14052 REV, Overpayment Explanation Reminders (Effective Date: September 11, 2014).

surrounding the debt. In contrast, when SSA first notifies a claimant of an overpayment, the overpayment notice sent to the debtor provides information as to how and when the overpayment occurred.

SSA has not made a final decision regarding its process for contacting, or recontacting, debtors should it resume its TOP collection efforts. We believe providing debt information for these 10-year and older delinquent debts similar to the overpayment notice it sends debtors when the overpayment is first established, would provide the debtor more information concerning the debt. However, SSA stated it believes many debtors will continue calling the National 800-Number, the debt collection units in the processing centers, and visit field offices regardless of the information provided to the debtor. SSA further expressed, at this time, it was focusing its efforts on exploring policy or legislative changes to limit TOP for childhood beneficiaries.

CONCLUSIONS AND RECOMMENDATIONS

SSA properly referred the 10-year and older delinquent debts to Treasury for TOP, as provided for under laws and regulations. SSA's ECO system also correctly selected and referred debts to Treasury according to its policies and procedures and prevented the selection of 700 debts due to discrepancies in SSA benefit records. When ECO's functional requirements identified discrepancies in SSA benefit records, it excluded the debt from TOP.

SSA mailed debtors the pre-offset notice informing them of the SSA debt and the possible TRO. However, over half of the initial pre-offset notices SSA mailed were returned as undeliverable. The high number of undeliverable notices occurred because SSA's records contained outdated addresses. Further, because of the high volume of undeliverable notices, SSA did not timely record the undeliverable notice information in ECO. This resulted in ECO referring debts to Treasury and subsequent TOP offsets even though SSA had received an undeliverable notice that would have prevented the referral and offset.

SSA took action to eliminate the backlog of un-scanned undeliverable notices. For those debtors who received a TOP offset although the U.S. Postal Service returned the notice as undeliverable, SSA had offered the debtors the opportunity to have their offset refunded, with the understanding that electing the refund does not eliminate the overpayment.

While not all SSA records contained the overpayment notice it sent debtors when their overpayments were first established, SSA's beneficiary records contained detailed information to establish how and when the overpayment occurred and when SSA sent an overpayment notice to a debtor. However, the pre-offset notice contained limited information about the debt and may have been insufficient for the debtor to recall the debt or the circumstances surrounding the debt.

Finally, SSA is considering its policy options regarding whether it would continue referring eligible 10-year and older delinquent debts to Treasury under TOP. Given the Agency decides to continue its TRO collection efforts for debts it has not yet referred to Treasury and for those already referred but the TRO was stopped, we recommend SSA:

1. Continue monitoring its implemented process change to obtain addresses from its contractor before sending the TOP pre-offset notice. SSA should determine whether the process continues to significantly reduce the number of undeliverable notices for debtors in which SSA is seeking a valid address. If not, SSA should explore other options for obtaining valid addresses.
2. Explore revising the TOP pre-offset notice to better explain the overpayment and when the overpayment was first established.
3. Resolve the record discrepancies for the 700 debts to ensure eligible debts are potentially selected by ECO and referred to TOP.

AGENCY COMMENTS

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

APPENDICES

Appendix A – SAMPLE PRE-OFFSET NOTICE

Social Security Administration Retirement, Survivors and Disability Insurance

Important Information

PROGRAM SERVICE CENTER
STREET ADDRESS
CITY, STATE ZIP
Date: MM/DD/YYYY
Claim Number: 123-45-6789 HA

CLAIMANT NAME
STREET ADDRESS
CITY, STATE ZIP

When you received Social Security benefits in the past on the above claim number, you were overpaid [\$\$\$\$\$\$\$.cc]. We have tried several times to collect this amount, but it has not been repaid. In a letter we sent to you (or your representative) earlier, we explained how this overpayment happened. We also told you about your right to question the decision about your overpayment and to ask that we not recover the overpayment.

Your Tax Refunds May Be Affected

Congress passed a law that permits the Department of Treasury to withhold Social Security overpayments from Federal income tax refunds. In addition, if the Federal government has an agreement with your State, Treasury may request that your State withhold money from any State tax refunds you may be due. This means that Treasury can withhold money from any tax refunds you may be due in the future under your Social Security Number, 123-45-6789.

What You Can Do

Your Social Security overpayment can be withheld from your tax refunds unless, within 60 days of the date of this letter, you:

- pay us back the full amount you owe, or
- agree to a definite plan for repaying this amount and repay it according to the plan, or
- give us evidence to show that you do not owe this amount or that we do not have the right to collect it, or
- ask us to waive collection of the overpayment.

See Other Side

Form SSA-L3252-SM-II (09-2012)

If You Are Filing A Joint Tax Return

If you are married and filing a joint income tax return, your spouse may be entitled to receive a portion of the joint refund. You should contact the Internal Revenue Service before you file a joint return to find out how to protect your spouse's share.

How To Pay Us Back

You should refund this overpayment within 60 days of the date of this letter. Use the enclosed "Payment Stub" and window envelope. The "Payment Stub" explains the ways you can make payment.

If you cannot refund the full amount now, you should:

- contact any Social Security office to arrange a definite plan for repayment, and
- make regular payments according to the plan.

Do You Have Evidence That You Do Not Owe This Money?

You may have evidence to show that you do not owe this amount, or that we do not have the right to collect it. If so, you must give us that evidence within 60 days of the date of this letter. We will review the evidence you give us and send you a letter with our decision before any overpayment is withheld from your tax refund. If we find that you do not owe us this amount or that we do not have the right to collect it from you, Treasury will not withhold it from your tax refunds.

You May Not Have To Pay Us Back

Sometimes we can waive the collection of an overpayment, which means you will not have to pay us back and we will not take any of the collection actions stated in this letter. For us to waive collection of your overpayment, two things must be true:

- it was not your fault that you got too much Social Security money

AND

- paying us back would mean you cannot pay your bills for food, clothing, housing or medical care, or it would be unfair for some other reason.

If you think these are true about you, contact any Social Security office. You can ask for a waiver any time by filling out the waiver form. We can help you fill out the form. The waiver form number is SSA-632. If you ask for waiver within 60 days of the date of this letter, we will not take any further collection actions while we decide if we can waive collection.

If We Cannot Approve Your Request For Waiver

If we determine that we are unable to approve your request for waiver, we will contact you to schedule a personal conference. A person who has not made any prior decision about your waiver request will meet with you. You can explain why you think your waiver request should be approved. You may bring a lawyer, friend or someone else to help you. Also, you can ask questions about the waiver decision.

After your personal conference has been held, or you have decided that you do not want us to conduct the conference, we will make a decision and send you a letter telling you whether you still must repay the overpayment. The letter will explain your right to appeal.

Your Right To Inspect Our Records

You have a right to inspect and copy our records related to your overpayment. If you notify us that you would like to do so, we will tell you where and when this can be done.

If You Have Any Questions

We invite you to visit our website at www.socialsecurity.gov on the Internet to find general information about Social Security. If you have any questions about your overpayment or this notice, you may call us at [the Debt Management Section telephone number if debt is under control of RECOOP system or the national 800 number if not under RECOOP control] or call your local Social Security office at [fill-in]. We can answer most questions over the phone. You may also write or visit any Social Security office. The office that serves your area is located at:

LOCAL OFFICE ADDRESS
CITY, STATE ZIP

If you do call or visit an office, please have this letter with you. It will help us answer your questions. Also, if you plan to visit an office, you may call ahead to make an appointment. This will help us serve you more quickly.

Social Security Administration

Enclosures:
Refund Envelope
Payment Stub

Form SSA-L3252-SM-II (09-2012)

Appendix B – SCOPE AND METHODOLOGY

To accomplish our objective, we:

- Reviewed applicable laws, regulations, and Social Security Administration (SSA) policies, procedures, and administrative and emergency messages.
- Reviewed related newspaper articles.
- Met with, and obtained information from, SSA's Offices of the Deputy Commissioners for Budget, Finance, Quality, and Management; Retirement and Disability Policy; and Systems.
- Met with the Department of the Treasury's (Treasury), Office of Inspector General regarding its review to assess Treasury's role in the offset of tax refunds, and other types of payments, to resolve non-tax debts owed the Government.
- Reviewed SSA's Office of Quality Review reports related to the delinquent 10-year and older debts referred to Treasury.
- Obtained an understanding of the Treasury Offset Program (TOP).
- Obtained an understanding of the criteria SSA used to select Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) 10-year and older delinquent debts it referred to Treasury for a tax refund offset.
- Obtained from SSA's Office of Systems, the data file of 10-year and older delinquent debts referred to Treasury, pending referral to Treasury, and pre-offset notices returned to SSA as undeliverable.
- To determine whether SSA properly selected 10-year and older delinquent debts for TOP, we used debtors' Social Security numbers (SSN) from the Office of Systems' data file and queried data from SSA's Master Beneficiary Record (MBR); Supplemental Security Record; Recovery of Overpayments, Accounting and Reporting records; Payment History Update System; Numident; Customer Service Records; Non-Entitled Debtors database; and External Collection Operation (ECO) database.

For each of the debts in Office of Systems' data file, we used the queried data to determine whether

- the debtor was alive,
- the debt was delinquent 10-years or longer,
- the debtor was 18 years or older when the debt was established¹ on SSA's records,
- the debtor was not currently entitled to OASDI or SSI benefits,
- the debt was \$25 or more, and
- SSA selected only qualified debts on an OASDI record for TOP.²

To determine whether debtors who had a TOP offset received a pre-offset notice, we used debtors' SSNs from the Office of Systems' data file and queried data from SSA's MBR and ECO systems. Our tests

- compared the date SSA recorded the pre-offset notice as "undeliverable" to the date Treasury notified SSA that a TOP offset occurred,
- verified the undeliverable notice was associated with the 10-year and older delinquent debt initiative, and
- excluded occurrences when SSA obtained a valid address from its address verification contractor before the TOP offset.

We provided SSA with the results of our tests.

We conducted our review between May 2014 and April 2015 in Atlanta, Georgia. We relied on SSA's data file of 10-year and older delinquent debts referred to Treasury, pending referral to Treasury, and pre-offset notices returned undeliverable as of April 11, 2014. We determined the data files used for this evaluation were sufficiently reliable to meet our evaluation objective. The principal entities evaluated were SSA's Offices of the Deputy Commissioners for Budget, Finance, Quality, and Management; Retirement and Disability Policy; and Systems. We conducted our review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

¹ When SSA discovers an overpayment, it establishes the debt on the benefit record. In some situations, an individual may have incurred the debt before age 18. However, SSA may not discover and establish the overpayment to the beneficiary's record until after he/she reaches age 18.

² When there were multiple debtors, including multiple auxiliaries, on a numberholder's OASDI record, SSA only selected the 10-year and older delinquent debt that qualified for TOP.

Appendix C – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: June 12, 2015

Refer To: SIJ-3

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

From: Frank Cristaudo 
Executive Counselor to the Commissioner

Subject: Office of the Inspector General Draft Report, "The Social Security Administration's Use of the Treasury Offset Program" (A-04-14-14104)-- INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,
“THE SOCIAL SECURITY ADMINISTRATION’S USE OF THE TREASURY OFFSET
PROGRAM” (A-04-14-14104)**

Recommendation 1

Continue monitoring its implemented process change to obtain addresses from its contractor before sending the TOP pre-offset notice. SSA should determine whether the process continues to significantly reduce the number of undeliverable notices for debtors in which SSA is seeking a valid address. If not, SSA should explore other options for obtaining valid addresses.

Response

We agree. We began monitoring the changes to our notification process in early 2014. We contacted the 8,000+ 10-year and older delinquent debtors that experienced an offset prior to receiving notification and offered a refund of the offset amount. In early February 2015, we implemented a change to our business process in which we used a more current address from our vendor to send notices to individuals requesting they contact us. Out of the initial group of 8,000+ debtors whose notices we monitored, 12 percent were undeliverable. For the second group of 452 debtors OIG identified during the review, 5 percent were undeliverable. This is an improvement over our previous process, where we experienced over a 22 percent undeliverable rate. For both of these mailings we received the undeliverable notices within several weeks, which is a significant improvement over the 6-month average waiting time we experienced in the past (based on our review of a representative sample.)

Recommendation 2

Explore revising the TOP pre-offset notice to better explain the overpayment and when the overpayment was first established.

Response

We agree.

Recommendation 3

Resolve the record discrepancies for the 700 debts to ensure eligible debts are potentially selected by the External Collection Operations and referred to TOP.

Response

We agree. We will resolve the records discrepancies for the 700 debts by the end of December 2015.

Appendix D – MAJOR CONTRIBUTORS

Theresa Roberts, Director, Atlanta Audit Division

Frank Nagy, Lead Auditor

Teaketa Turner, Senior Auditor

Luis Ramirez, Audit Data Specialist

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