



Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

Volume Representative Payee for the
Social Security Administration in
Connecticut

A-15-18-50443 / June 2019

MEMORANDUM

Date: June 24, 2019 **Refer To:**

To: Linda M. Dorn
Regional Commissioner
Boston

From: Assistant Inspector General for Audit

Subject: Volume Representative Payee for the Social Security Administration in Connecticut
(A-15-18-50443)

The attached final report presents the results of our review. Our objectives were to determine whether the (1) representative payee had effective safeguards over the receipt and disbursement of Social Security benefit payments for individuals in her care and (2) benefit payments were used and accounted for in accordance with Social Security Administration policies and procedures.

If you wish to discuss the final report, please call me or have your staff contact Victoria Vetter, Director, at (410) 966-9081.



Rona Lawson

Attachment

cc:
Trae Sommer, Acting Director for Audit Liaison Staff

Volume Representative Payee for the Social Security Administration in Connecticut

A-15-18-50443



June 2019

Office of Audit Report Summary

Objective

To determine whether the (1) representative payee had effective safeguards over the receipt and disbursement of Social Security benefit payments for individuals in her care and (2) benefit payments were used and accounted for in accordance with Social Security Administration (SSA) policies and procedures.

Background

Congress granted SSA the authority to appoint representative payees for those beneficiaries judged incapable of managing or directing the management of their benefit payments because they have a mental or physical disability or are a child. Representative payees manage benefits in the beneficiary's best interest and ensure Social Security payments are used for the beneficiary's current maintenance, including food, shelter, clothing, medical care, and personal comfort items.

During our audit period, February 1, 2017 through January 31, 2018, the representative payee under review served 503 beneficiaries. According to SSA records, she was both an individual and organizational payee. We reviewed a random sample of 50 beneficiaries' files to ensure the benefit payments were used and accounted for in accordance with SSA policies and procedures. In addition, we visited several facilities to interview beneficiaries and their social workers.

Findings

During our review period, the representative payee ensured the basic needs of the 50 beneficiaries in our random sample were met. The representative payee generally (1) ensured Social Security benefits were used in accordance with SSA's policies and procedures and (2) had effective safeguards over the receipt and disbursement of Social Security benefits.

For the 50 beneficiaries in our sample, we found support for all major living expenses, such as rent, utilities, and medical expenses. We found the representative payee did not maintain documentation to account for how 37 beneficiaries used their personal spending allowance. We recognize there is an inherent tension between SSA's policies and procedures for representative payees and the payee's obligations pursuant to her court-appointed status as a conservator for the beneficiaries. These obligations require "least restrictive means of intervention" necessary to meet the conservated person's needs. In addition, we found 4 beneficiaries were charged over \$150 in bank overdraft fees, and 28 were charged over \$1,000 in automated teller machine charges.

We also found the representative payee should improve controls to restrict unauthorized access to beneficiaries' records and should, as resources allow, improve controls over beneficiaries' funds by assigning different individuals to maintain accounting/bank records and sign checks. Finally, SSA's system had categorized the representative payee as an individual payee and her law firm as an organizational payee.

Recommendations

We made seven recommendations to SSA concerning this representative payee's safeguards over the receipt and disbursement of Social Security benefit payments and accounting for the use of benefits.

SSA agreed with our recommendations.

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ABBREVIATIONS

ATM	Automated Teller Machine
C.F.R.	Code of Federal Regulations
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SSA	Social Security Administration
U.S.C.	United States Code

OBJECTIVES

Our objectives were to determine whether the (1) representative payee had effective safeguards over the receipt and disbursement of Social Security benefit payments for individuals in her care and (2) benefit payments were used and accounted for in accordance with Social Security Administration (SSA) policies and procedures.

BACKGROUND

A representative payee receives and disburses benefit payments on a beneficiary's behalf.¹ SSA appoints representative payees for those beneficiaries who are incapable of managing or directing the management of their benefit payments because they have a mental or physical disability or are a child.² A representative payee may be an individual or an organization. Representative payees are responsible for managing benefits³ in the beneficiary's best interest and ensuring benefit payments are used for the beneficiary's current maintenance,⁴ including food, shelter, clothing, medical care, and personal comfort items. See Appendix B for representative payees' responsibilities.

A representative payee may also act as an individual's conservator, responsible for administering an individual's property and financial affairs. A State court must appoint a payee as conservator who may charge fees for their services.⁵

During our audit period, February 1, 2017 through January 31, 2018, the representative payee served 503 SSA beneficiaries and managed more than \$4 million in SSA benefits, annually. She was a practicing attorney in Connecticut and the court-appointed conservator for all 503 beneficiaries. To grant conservatorship in Connecticut, a court ruling or appointment must find the beneficiary incapable of caring for him/herself or incapable of managing or directing the management of his/her financial affairs or benefits. In addition, *Guidelines for Conservators* from the Connecticut Probate Courts instruct courts to only assign duties to the conservators that are the least restrictive means of intervention necessary to meet the conserved person's needs.⁶

¹ In this report, we use the term "beneficiary" to refer to both Old-Age, Survivors and Disability Insurance beneficiaries and Supplemental Security Income recipients.

² *Social Security Act §§ 205(j) and 1631(a)(2), 42 U.S.C. §§ 405(j) and 1383(a)(2)* (govinfo.gov 2017).

³ The term "benefits" in this report refers to both Old-Age, Survivors and Disability Insurance benefits and Supplemental Security Income payments.

⁴ 20 C.F.R. §§ 404.2040 and 416.640 (govinfo.gov 2017).

⁵ SSA, *POMS*, GN 00602.040, A (July 21, 2009).

⁶ The "least restrictive means of intervention" is sufficient to provide, within the resources available to the conserved person, from either his/her own estate or private or public assistance, for a conserved person's personal needs or property management while affording the conserved person the greatest amount of independence and self-determination.

As of July 1, 2016, the representative payee had entered into a contract with the State of Connecticut Probate Court to accept all proposed conservatorship appointments from 10 courts. According to the contract, “. . . the maximum number of conservatorship appointments that the Contractor is required to accept under this Agreement is 850.” The contract also stated the courts would pay the payee a fee of approximately \$86 a month for each person for whom she served as a conservator and who were unable to pay for the conservator’s services.⁷ Most of the beneficiaries had a mental disorder, and a social worker was involved in their care.

According to SSA’s records, the representative payee was listed as an individual payee, and her law firm was listed as an organizational payee. The representative payee stated she had been working with the SSA field office to transfer all her beneficiaries so her law firm would be their organizational payee. Field office staff stated the payee would have to re-apply for each beneficiary to switch the payee on record to the organization. As of June 18, 2019, this had not been completed.

In June 2018, we conducted a site visit at the representative payee’s office in Shelton, Connecticut. We reviewed a random sample of 50 beneficiaries’ files from the population of 503 beneficiaries for the period February 1, 2017 through January 31, 2018. Additionally, we visited 3 facilities and several supervised apartments to interview 14 beneficiaries and their social workers. See Appendix A for our scope and methodology.

RESULTS OF REVIEW

During our review period, the representative payee ensured the basic needs of the 50 beneficiaries in our random sample were met. The representative payee generally (1) ensured Social Security benefits were used in accordance with SSA’s policies and procedures and (2) had effective safeguards over the receipt and disbursement of Social Security benefits.

For the 50 beneficiaries in our sample, we found supporting documentation for all major living expenses, such as rent, utilities, and medical expenses. We found that the representative payee did not obtain supporting documentation or explanations to account for how 37 beneficiaries used their personal spending allowance. However, we recognize the inherent tension between SSA’s policies and procedures for representative payees and the payee’s obligations pursuant to her court-appointed status as a conservator for the beneficiaries, which requires “least restrictive means of intervention” necessary to meet the needs of the conservated person. We also found 4 beneficiaries were charged over \$150 in bank overdraft fees, and 28 were charged over \$1,000 in automated teller machine (ATM) charges.

⁷ For those individuals the courts determined to have counted assets that exceeded the maximum to be eligible for medical assistance and therefore not considered unable to pay, the payee collected fees totaled over \$150,000 from the beneficiaries’ funds for professional services. SSA policy allows an individual to collect conservatorship fees as long as the beneficiary’s needs are met first and the conservatorship costs do not deplete the beneficiary’s funds.

We also found the representative payee should improve controls to restrict unauthorized access to beneficiaries' records and should, as resources allow, improve controls over beneficiaries' funds by assigning different individuals to maintain accounting/bank records and sign checks. Finally, SSA's system had categorized the representative payee as an individual payee and her law firm as an organizational payee.

Use and Accounting for Social Security Benefits

The payee was a court-appointed conservator and, as such, was required to follow the court's guidelines regarding documenting use of benefits. Although the payee may have followed the court's guidelines, she did not always follow SSA's requirements and account for Social Security benefits in accordance with SSA policies and procedures. The representative payee did not always maintain supporting documentation to account for beneficiaries' personal spending, should have reimbursed beneficiaries for bank overdraft fees, and should minimize ATM surcharges assessed on beneficiaries' bank accounts.

Supporting Documentation

The payee had supporting documentation for all the beneficiaries' major living expenses, such as rent, utilities, and medical bills. However, 37 beneficiaries received over \$107,000 in cash and/or checks for personal necessities, and the representative payee did not obtain supporting documentation or explanation for the use of the funds to reduce the risk of inappropriate spending.

We examined each sampled beneficiary's file the representative payee maintained. The representative payee set most beneficiaries up with two checking accounts. She provided beneficiaries a debit card and access to only one account, which allowed them to make their own purchases. The representative payee established a budget for each beneficiary that included monthly bills and personal spending. She and/or her staff transferred money from one checking account into the account to which the beneficiary had access or wrote checks for their personal spending. The beneficiaries either made purchases with their debit card or withdrew cash from an ATM. The representative payee used bank statements to monitor the debit card purchases; however, she did not request documentation to support any cash purchases.

The representative payee purchased gift cards for some beneficiaries to buy personal items. In most cases, the beneficiary's social worker took them shopping. We noted one beneficiary received \$60 in personal allowances each week but also received \$200 or more in Walmart gift cards each month. However, the payee did not request documentation from the beneficiary or social worker and therefore did not have assurance the gift cards were used for the beneficiary's personal needs.

SSA policy states, “A payee must use benefits to provide for the beneficiary’s current needs such as food, clothing, housing, medical care and personal comfort items, or for reasonably foreseeable needs.”⁸ In addition, if benefits are not used for the beneficiary’s current needs, the payee must conserve or invest the benefits on the beneficiary’s behalf.⁹ Although State conservatorship guidelines may not require supporting documents for all expenses to reduce the risk of inappropriate spending, the payee should, at a minimum, obtain an explanation for the use of benefits provided in cash and/or gift cards to ensure the use of benefits met SSA policy.

For example, a beneficiary received \$735 a month in Supplemental Security Income payments and lived with his mother. Each month, the representative payee paid the mother \$100 for rent from the beneficiary’s account. In addition, the representative payee transferred between \$120 and \$360 each week to the beneficiary’s debit card for his personal use. We found that, after the payee deposited the money into his account, he immediately withdrew it. There was no supporting documentation in the beneficiary’s file regarding these transactions. When we asked the representative payee whether she knew what the beneficiary was using the money for, she stated the beneficiary purchased some groceries for his mother, but he liked to buy new clothes and shoes. Although the payee generally knew the beneficiary liked to shop, there was no documentation to warrant providing the beneficiary most of his benefits in cash each month. The representative payee should be able to explain why the beneficiary needed more money to shop instead of potentially conserving those funds for future needs.

In another example, the representative payee provided a beneficiary a check for approximately \$350 every 2 weeks for personal spending. The representative payee did not request documentation to ensure the money was used appropriately. The representative payee canceled one of the beneficiary’s checks because she was under the influence of drugs and alcohol. However, the representative payee continued issuing personal allowance checks after this instance without requesting support.

Bank Fees

We noted only four instances in the 12-month period where beneficiaries were charged unreimbursed bank fees, totaling over \$150. Because of the number of beneficiaries in the representative payee’s care, the bank automatically paid many of the bills. According to the representative payee, the system automatically produced a check even if the funds were not available in the beneficiary’s account. In two instances, beneficiaries were charged an overdraft fee when funds did not cover housing costs. The beneficiaries were not reimbursed for the fees. These types of fees are within the payee’s control and are not in the beneficiary’s best interest.

⁸ SSA, *POMS*, GN 00602.001, A2 (March 5, 2002).

⁹ SSA, *POMS*, GN 00602.001, A2 (March 5, 2002).

In addition to overdraft fees, 28 beneficiaries were charged over \$1,000 in ATM surcharges. In most instances, the surcharges were minimal compared to their benefit amounts; however, one beneficiary paid over \$180 in surcharges during our review period. The representative payee stated the beneficiaries were told which ATMs they could use to avoid surcharges, but, in many instances, they wanted their cash immediately and used the ATM that was most convenient. The payee should continue working with the beneficiaries to encourage them to use ATMs that do not charge fees.

Receipt and Disbursement of Social Security Benefits

We identified areas for improvement surrounding the internal controls over the receipt and disbursement of Social Security benefits. Specifically, enhancements should be made to safeguard financial records and assets and restrict unauthorized access to beneficiaries' records by assigning different individuals to maintain account/bank records, sign checks, and establish supervision of accounting procedures.

Safeguarding of Beneficiaries' Financial Records and Assets

The representative payee should improve her physical security controls to restrict unauthorized access to beneficiaries' records and assets. During our site visit, blank checks, along with conservatorship certificates, were in unlocked filing cabinets that were accessible to all the office staff, including those who worked part-time in the evenings and on weekends. Access restrictions and physical safeguards for maintaining beneficiaries' sensitive personal and financial information should minimize the risk of loss or unauthorized use of beneficiaries' personal information and funds. The representative payee should also ensure the records are only accessible to those individuals responsible for the beneficiaries' care.

Controls over the Receipt and Disbursement of Benefits

The representative payee had a staff of four full-time paralegals who handled the beneficiaries' accounts. Because of the large number of beneficiaries in the representative payee's care, each paralegal was assigned her own beneficiaries to manage. The paralegals monitored bank accounts, paid bills, and ensured the beneficiaries' needs were met. They could make purchases without review or approval. Each paralegal had access to the signature stamp and could submit payments without anyone validating they were correct and appropriate.

According to SSA's *Guide for Organizational Representative Payees*,¹⁰ a payee should assign a different person to perform basic duties, such as maintaining ledgers and bank records; writing and signing checks; and reconciling ledgers and bank accounts, provided the size of the payee's staff allows them to do so. Additionally, a payee should establish a procedure for the review and supervision of accounting functions. For example, the payee could require a second employee's

¹⁰ SSA, *Guide for Organizational Representative Payees*, p. 50 (2014).

approval when a proposed disbursement exceeds a certain limit and establish a countersignature requirement for all checks written or those that exceed a certain threshold.¹¹

To the extent possible, the representative payee should establish procedures to decrease the risk of loss or unauthorized use of beneficiaries' funds. This could include establishing procedures for the review and oversight of the accounting functions within the office.

Payee Classification

While obtaining the representative payee's population of beneficiaries from SSA's system, we found the representative payee was categorized as an individual payee and her law firm was listed as an organizational payee. Although a payee's responsibilities do not change based on its classification, SSA policy instructs that disclosure of beneficiary information be made only to an individual payee.¹² However, an organizational payee's beneficiary information can also be disclosed to individuals who represent the payee.¹³ Because of the large number of beneficiaries in the representative payee's care, it is not realistic for SSA to only disclose information to the payee since her staff managed beneficiaries' funds. Therefore, when the payee was listed as an individual, SSA disclosed information to the payee's staff in contravention of SSA's policy. To ensure beneficiary information is only disclosed according to policy, the payee and SSA were taking corrective actions to transfer all the beneficiaries to her law firm as an organizational payee.

Since SSA's systems listed the payee as an individual and an organization, SSA conducted two reviews of the payee. The first review of the beneficiaries listed under the individual payee was completed in June 2015, and a second review of the payee as an organizational payee was completed in July 2018. SSA did not review the representative payee's entire beneficiary population for each review, rather it only reviewed beneficiaries under each classification in SSA's system. According to SSA, the individual and organization were treated as two distinct payees.¹⁴

CONCLUSIONS

During our review period, the representative payee ensured the basic needs of the 50 beneficiaries in our random sample were met. The representative payee generally (1) ensured Social Security benefits were used in accordance with SSA's policies and procedures and (2) had effective safeguards over the receipt and disbursement of Social Security benefits.

¹¹ SSA, *Guide for Organizational Representative Payees*, pp. 50 and 51 (2014).

¹² SSA, *POMS*, GN 03316.120, A.2 (July 23, 2009).

¹³ SSA, *POMS*, GN 03360.005, B.4(c) (December 20, 2010).

¹⁴ Each review included an evaluation of 10 beneficiaries' financial records. Therefore, SSA reviewed a total of 20 beneficiaries' records for this payee during the 2 reviews as opposed to only 10 had the payee been categorized as a single payee.

RECOMMENDATIONS

We recommend SSA:

1. Remind the representative payee to maintain supporting documentation for personal needs expenditures.
2. Require that the representative payee review all beneficiaries' files and reimburse all bank overdraft fees.
3. Require that the representative payee continue reminding the beneficiaries about using ATMs that do not charge fees.
4. Require that the representative payee improve controls to restrict access to the beneficiaries' records.
5. Ensure the representative payee implements segregation of duties or other mitigating controls, as appropriate.
6. Work with the representative payee to ensure all beneficiaries in her care are categorized under her organization.
7. Remind staff not to disclose beneficiary information to individuals when it conflicts with policy.

AGENCY COMMENTS

SSA agreed with our recommendations; see Appendix C.

REPRESENTATIVE PAYEE COMMENTS

The representative payee generally disagreed with our findings and recommendations. The payee agreed that maintaining supporting documentation is ideal but not always practical given the beneficiaries have mental and cognitive impairments. The payee commented that the amount of unreimbursed ATM fees was minimal and was attributed to the beneficiary's "desire to use out of network ATMs." The payee disagreed with our recommendation to restrict access to beneficiaries' records, citing that there was no evidence that locking cabinets would provide better security and that it was insured against employee theft of beneficiary funds. The payee does not believe it has adequate staffing to allow for segregation of duties and stated that it conducts monthly reviews of each beneficiary's account and submits a full accounting of all money spent to the Probate Court tri-annually. Finally, the payee indicated it is working to move all the beneficiaries in her care under her organization.

OIG RESPONSE

SSA should continue working with the representative payee to implement our recommendations to ensure the payee uses Social Security benefits in accordance with SSA requirements and in the best interests of the beneficiaries in its care.

A handwritten signature in black ink that reads "Rona Lawson". The signature is fluid and cursive, with "Rona" on top and "Lawson" below it, both starting with a capital letter.

Rona Lawson
Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

To accomplish our objectives, we:

- Reviewed applicable sections of the *Social Security Act*, Federal regulations, and Social Security Administration (SSA) policies and procedures pertaining to representative payees and conservators.
- Reviewed prior Office of the Inspector General and SSA work in the representative payee area.
- Contacted SSA’s Boston Regional Office and a field office to obtain background information and prior audits regarding the representative payee.
- Compared and reconciled a list of SSA beneficiaries in the representative payee’s care from the payee to a list we obtained from SSA’s representative payee system.
- Reviewed the representative payee’s internal controls over the receipt and disbursement of Social Security benefits.
- Reviewed a random sample of 50 beneficiaries for whom the representative payee served as both the payee and court-appointed conservator. For the period February 1, 2017 through January 31, 2018, we:
 - Reviewed the beneficiaries’ bank statements to determine whether benefit payments were properly deposited. The sample of beneficiaries received over \$440,000 in benefits during our review period.
 - Reviewed beneficiary files for supporting documentation of expenses and personal spending.
- Conducted site visits at two care facilities, one group home, and several supervised apartments where several beneficiaries in the representative payee’s care resided. During the visits to the two care facilities, we met with eight beneficiaries, one social worker, and the nursing director. During our visit to the supervised apartments, we met with five beneficiaries and one social worker. We were able to visit the apartments to ensure their living arrangements were adequate. Finally, during the visit to the group home we met with one beneficiary and one social worker.

We conducted our fieldwork in SSA’s Boston Region in June 2018 and finalized our analysis at SSA’s Headquarters in Baltimore, Maryland, from July through December 2018. We determined the computerized data used during our review were sufficiently reliable given our objectives, and the intended use of the data should not lead to incorrect or unintentional conclusions. The entities audited were SSA’s Boston Regional Office and the large-volume representative payee. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B – REPRESENTATIVE PAYEES’ RESPONSIBILITIES

Representative payees are responsible for using benefits to serve the beneficiary’s best interests. The responsibilities include the following.¹

- Meet with the beneficiary on a regular basis to ascertain his/her current and foreseeable needs.
- Conserve benefits not needed for the beneficiary’s current needs.
- Keep detailed and accurate records of how the representative payee uses benefits to provide an accurate report to the Social Security Administration (SSA) when requested.
- Complete the accounting form online or return the completed form timely once a year.
- Report events that may affect the beneficiary’s entitlement or amount of payment (including the beneficiary’s death or incarceration).
- Report when unable to locate or contact the beneficiary.
- Cooperate with Supplemental Security Income eligibility redeterminations.
- Ensure that medical treatment is obtained for minor children receiving Supplemental Security Income disability payments.
- Report address and custody changes.
- Report any change in circumstances that would affect performance as representative payee.
- Return any benefits to which the beneficiary is not entitled.
- Act for the beneficiary on matters relating to the beneficiary’s claim.
- Notify SSA if the beneficiary no longer needs a representative payee.
- Return any conserved funds or unused benefits to SSA when representative payee services terminate.

¹ SSA, POMS, GN 00502.114, A (February 27, 2014).

Appendix C – AGENCY COMMENTS

Sent: Thursday, June 6, 2019

Subject: Signed Revised Draft Report (A-15-18-50443)- Boston Reply

Good afternoon,

Thank you for the opportunity to provide feedback on the revised draft report for “Volume Representative Payee for the Social Security Administration in Connecticut”.

Boston reviewed the revised draft report and agrees with the noted recommendations in the report.

We apologize for the late response.

Please contact me if you have any questions.

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