

*Audit Report*

Cross-program Recovery to Collect  
Overpayments



## MEMORANDUM

**Date:** April 28, 2017 **Refer To:**

**To:** The Commissioner

**From:** Acting Inspector General

**Subject:** Cross-program Recovery to Collect Overpayments (A-13-15-15029)

The attached final report presents the results of the Office of Audit's review. The objective was to assess the Social Security Administration's cross-program recovery of overpayments, as authorized by the *Social Security Protection Act of 2004*.

If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, 410-965-9700.



Gale Stallworth Stone  
Gale Stallworth Stone

Attachment

# Cross-program Recovery to Collect Overpayments

## A-13-15-15029



April 2017

Office of Audit Report Summary

### Objective

To assess the Social Security Administration's (SSA) cross-program recovery (CPR) of overpayments, as authorized by the *Social Security Protection Act of 2004* (SSPA).

### Background

SSA administers the Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) programs under Titles II and XVI of the *Social Security Act*, respectively. An overpayment is the total amount an individual received for any period that exceeded the total amount that should have been paid for that period. With a few exceptions, overpaid individuals are responsible for repaying the overpayments.

The enactment of SSPA provided SSA additional authority to recover OASDI overpayments and reaffirmed the Agency's authority to collect SSI overpayments using CPR. CPR is the process of collecting overpayments for one SSA-administered program by withholding the individual's payable benefits from another SSA-administered program.

### Findings

SSA did not always exercise its authority to impose mandatory CPR for recovery of OASDI and SSI overpayments. As of October 2014, we had identified 20,731 individuals who had OASDI and SSI overpayments totaling about \$86.9 million that were potentially available for CPR.

We reviewed 100 individuals' overpayments and determined 99 were available for CPR as of October 2015.

In addition, we found instances where SSA had not updated its Supplemental Security Records (SSR) to (1) transfer overpayments from a terminated SSR to the current SSR so it could pursue collection efforts, (2) document its use of CPR to collect SSI overpayments that could prevent pursuit of collection efforts on a recovered debt, or (3) reestablish collection efforts after CPR was no longer available.

We provided the overpayments for the 99 individuals to the Agency for review. As of March 2017, SSA had initiated CPR actions for 80, and overpayments for 19 individuals were no longer available for CPR.

Based on our sample results, we believe SSA should review the remaining individuals we identified who had OASDI and SSI overpayments and determine whether it should use CPR as a debt collection tool for the overpayments we identified.

We also found SSA had implemented corrective actions pertaining to our prior recommendations. However, SSA had not begun collection efforts for SSI overpayments for 11 individuals we identified in our prior audit. As of January 2017, SSA had initiated CPR actions for nine and overpayments for two individuals were no longer available for CPR.

### Recommendations

We made three recommendations to address the findings in this review, which includes SSA reviewing the remaining individuals we identified and imposing mandatory CPR for all applicable overpayments.

SSA agreed with our recommendations.

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## **ABBREVIATIONS**

C.F.R.	Code of Federal Regulations
CPR	Cross-program Recovery
MBR	Master Beneficiary Record
OASDI	Old-Age, Survivors and Disability Insurance
OIG	Office of the Inspector General
POMS	Program Operations Manual System
Pub. L. No.	Public Law Number
ROAR	Recovery of Overpayments Accounting and Reporting System
SSA	Social Security Administration
SSI	Supplemental Security Income
SSPA	<i>Social Security Protection Act of 2004</i>
SSR	Supplemental Security Record
U.S.C.	United States Code

## OBJECTIVE

Our objective was to assess the Social Security Administration's (SSA) cross-program recovery (CPR) of overpayments, as authorized by the *Social Security Protection Act of 2004* (SSPA).<sup>1</sup>

## BACKGROUND

SSA administers the Old-Age, Survivors and Disability Insurance (OASDI) and Supplemental Security Income (SSI) programs under Titles II and XVI of the *Social Security Act*, respectively.<sup>2</sup> The OASDI program provides benefits to retired and disabled workers, including their dependents and survivors.<sup>3</sup> The SSI program provides payments to financially needy individuals who are aged, blind, or disabled.<sup>4</sup>

An overpayment is the total amount an individual received for any period that exceeded the total amount the individual should have received for that period. Overpayments are debts owed the Government.<sup>5</sup> With a few exceptions, overpaid individuals are responsible for repaying the overpayments.<sup>6</sup>

CPR is the process of collecting overpayments for one SSA-administered program by withholding the individual's payable benefits from another SSA-administered program.<sup>7</sup> SSPA reaffirmed the Agency's authority to collect SSI overpayments from OASDI benefits under section 1147 of the *Social Security Act* and expanded its authority by allowing SSA to use CPR to collect OASDI overpayments from SSI payments.<sup>8</sup> SSA implemented mandatory CPR to collect SSI overpayments in February 2002 and implemented mandatory CPR to collect OASDI overpayments in April 2013. The Agency can use CPR to withhold up to 10 percent of individuals' OASDI monthly payments and either 100 percent of individuals' SSI monthly payments or an amount that is 10 percent of their income, whichever is lower.<sup>9</sup> SSPA also

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<sup>1</sup> *Social Security Protection Act of 2004*, Pub. L. No. 108-203 § 210 and, *Social Security Act* § 1147, 42 U.S.C. § 1320b-17.

<sup>2</sup> *Social Security Act* §§ 201 and 1601, 42 U.S.C. §§ 401 and 1381.

<sup>3</sup> *Social Security Act* § 202, 42 U.S.C. § 402.

<sup>4</sup> *Social Security Act* § 1601, 42 U.S.C. § 1381.

<sup>5</sup> SSA, POMS, GN 02201.001 A. (July 20, 2010).

<sup>6</sup> Individuals may not be responsible for repaying an overpayment if the person was without fault in causing the overpayment, and recovery would either defeat the purpose of the *Social Security Act* or be against equity and good conscience. SSA, POMS, GN 02250.001 (October 4, 2005) and SI 02260.001 A. 1. (January 30, 2017).

<sup>7</sup> 20 C.F.R. §§ 404.530 (a) and, 416.572 (a).

<sup>8</sup> SSA, POMS, GN 02210.008 A. (April 25, 2013).

<sup>9</sup> *Social Security Act* § 1147, 42 U.S.C. § 1320b-17(b)(1).

authorizes SSA to use CPR to recover OASDI and SSI overpayments by withholding up to 100 percent of any underpayment payable to individuals from the OASDI and SSI programs.<sup>10,11</sup>

In a prior report, we stated the Agency did not fully implement its CPR authority, as authorized under SSPA, and could improve its management controls over CPR.<sup>12</sup> Specifically, SSA did not collect OASDI overpayments when individuals received SSI payments. In addition, SSA did not comply with its policy for mandatory CPR of SSI overpayments when individuals received OASDI benefits. Our prior report included three recommendations with which SSA generally agreed. See Appendix A for a summary of the prior report.

To conduct this review, we obtained two electronic data extracts as of October 22, 2014.<sup>13</sup> One extract used data from the Supplemental Security Record (SSR) and contained 45,339 individuals who received SSI payments and had OASDI overpayments. The other used data from the Master Beneficiary Record (MBR) and contained 100,321 individuals who received OASDI benefits and had SSI overpayments. We applied various screening criteria and removed 34,021 and 90,777 records from the first and second data extracts, respectively. We identified the following as our audit population:

- 11,318 individuals who had about \$53.2 million in OASDI overpayments and who
  - (a) received SSI payments and had no SSI overpayment recorded on the SSR, (b) had a terminated MBR and an OASDI overpayment of \$512 or more, and (c) had no indication on the SSR that SSA previously used CPR to collect the overpayment.<sup>14,15</sup>
- 9,544 individuals who had about \$34.2 million in SSI overpayments and who (a) received OASDI benefits and had no OASDI overpayment recorded on the MBR, (b) had a terminated SSR and an SSI overpayment of \$512 or more, and (c) had no indication on the MBR that SSA previously used CPR to collect the overpayment.<sup>16</sup>

We randomly selected a sample of 50 individuals from each data extract to review. Within the sample of SSI overpayments, we found one individual who was receiving SSI payments. The overpayment was on a terminated SSR. SSA had not transferred the overpayment to the current

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<sup>10</sup> SSA policy identifies an underpayment as any monthly benefit amount (or portion of a monthly benefit amount) due a person, which has not been paid. SSA, POMS, GN 02301.001 A. (June 23, 2006).

<sup>11</sup> *Social Security Act* § 1147, 42 U.S.C. § 1320b-17(a).

<sup>12</sup> SSA OIG, *Cross-Program Recovery of Benefit Overpayments* (A-13-06-16031), pp. 6 and 7, June 2007.

<sup>13</sup> On December 16, 2014, we obtained overpayment data from the Recovery of Overpayments, Accounting and Reporting (ROAR) systems for all individuals we identified in the two data extracts.

<sup>14</sup> In a July 2015 report, *Cost-benefit Analysis of Processing Low-dollar Overpayments* (A-07-14-14065), p. 9, we concluded for some overpayments, collection was not always cost-beneficial to SSA. For purposes of this review, we assumed that any overpayment under \$512 would not be cost-beneficial for the Agency to collect.

<sup>15</sup> A terminated MBR means an individual is not in current pay status for OASDI benefits.

<sup>16</sup> A terminated SSR means an individual is not in current pay status for SSI payments.

SSR that indicated the individual was receiving SSI payments. According to SSA's policy, SSI overpayments are not eligible for mandatory CPR when an individual is receiving SSI payments.<sup>17</sup> Therefore, SSA could use other types of overpayment recovery, including collecting the SSI overpayments from the individual's monthly SSI payments. We replaced this individual in our sample. We later found the data extract of SSI overpayments contained another 129 individuals who were receiving SSI payments and SSA had not transferred the overpayments from the terminated SSR to the current SSR. Therefore, their SSI overpayments were not eligible for CPR.<sup>18</sup> We reduced our population of SSI overpayments from 9,544 to 9,414. See Appendix B for a discussion of our scope and methodology and Appendix C for our detailed sampling methodology.

## RESULTS OF REVIEW

The Agency did not always use mandatory CPR to recover OASDI and SSI overpayments, as authorized under SSPA. We reviewed 100 individuals' overpayments and determined 99 were available for CPR as of October 2015.

In addition, we found instances where SSA had not updated its records to (1) transfer overpayments from a terminated SSR to the current SSR so it could pursue collection efforts, (2) document its use of CPR to collect SSI overpayments that would prevent pursuit of collection efforts on a recovered debt, or (3) reestablish collection efforts after CPR was no longer available.

We also found SSA had implemented corrective actions to address our prior findings. However, SSA had not begun collection efforts for some overpayments identified in our prior audit.<sup>19</sup>

### Mandatory CPR to Collect OASDI Overpayments

We reviewed a sample of 50 individuals who had OASDI overpayments totaling \$259,173. For 49 individuals, we found that, although SSA could have used mandatory CPR to collect the overpayments from SSI payments, it did not. Instead, the Agency

- terminated its collection efforts;
- had installment agreements to collect the overpayments; or
- had pending collection efforts.<sup>20</sup>

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<sup>17</sup> SSA, POMS, SI 02220.020 A.2.a. (April 1, 2014).

<sup>18</sup> See section Transfer of SSI Overpayments to the Current SSR for detailed discussion on the 130 individuals we subsequently removed from the audit population. See also Appendix C for sampling methodology.

<sup>19</sup> SSA OIG, *Cross-Program Recovery of Benefit Overpayments* (A-13-06-16031), pp. 8 and 9, June 2007.

<sup>20</sup> As of October 29, 2015, there were alerts on the ROAR that indicated the collection of the overpayment was pending with SSA's processing center. However, overpayments remained available for collection.

See Table 1 for a summary of the overpayment collection actions.

**Table 1: OASDI Overpayment Collection Actions Recorded on the MBR as of October 2014**

SSA's Collection Actions	Number of Individuals	Amount of OASDI Overpayment
Collection Efforts Terminated	39	\$94,803
Installment Agreement – Overpayments Collected Using Installment Payments	3	\$146,224
Installment Agreement - No Collection Occurred Under the Agreement or Collection Had stopped	2	\$3,571
Collection Efforts Pending	5	\$13,316
<b>Total Available for CPR</b>	<b>49</b>	<b>\$257,914</b>

For 39 (80 percent) individuals, SSA terminated collection efforts because they could not repay the overpayment; however, they were all receiving SSI payments. For example, in May 2006, SSA decided to terminate its collection efforts concerning one individual's OASDI overpayment. As of October 2014, the individual was collecting \$481 in monthly SSI payments while the outstanding \$8,550 overpayment went uncollected. SSA policy states that collection efforts it terminates remain subject to recovery using CPR from other benefits payable to the individual.<sup>21</sup> Had SSA used CPR, we estimate it would have collected about \$1,444 of the OASDI overpayment by October 2015.<sup>22</sup>

Five (10 percent) of the individuals we reviewed had installment agreements to repay a total of \$149,795 in OASDI overpayments. For example, one individual had an installment agreement to pay SSA \$20 a month.<sup>23</sup> As of October 2014, the individual was collecting \$721 in monthly SSI payments while having an \$866 OASDI overpayment. Since the April 2013 implementation of mandatory CPR, SSA had collected about \$21 of the overpayment using installment payments. Had SSA used CPR, we estimate it could have collected the entire OASDI overpayment by May 2014.<sup>24</sup> We believe the Agency should impose mandatory CPR for individuals repaying their OASDI overpayments in installments.

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<sup>21</sup> SSA, POMS, GN 02215.235 C.6.c. (July 2, 2015).

<sup>22</sup> The individual had been receiving SSI payments since December 2005. We calculated the recovery of \$1,444 based on 10 percent of the individual's monthly SSI payment from May 2013 to October 2015.

<sup>23</sup> SSA established the installment agreement in November 2010, before it implemented mandatory CPR and had collected \$148 as of October 2014.

<sup>24</sup> We calculated the recovery of the entire \$866 overpayment based on 10 percent of the individual's monthly SSI payment from May 2013 to May 2014.

For five individuals, collection efforts were pending with SSA's processing center. The OASDI overpayments totaled \$13,316 as of October 2014. These overpayments had been available for mandatory CPR, on average, almost 2 years.<sup>25</sup> Had SSA used CPR, we estimate it would have collected about \$9,268 of the OASDI overpayments by October 2015.

Finally, we found one individual was not an SSI recipient, and SSA could not collect the \$1,259 OASDI overpayment using CPR. Upon further review of the individual's record in June 2016, we found the Social Security number referenced on the MBR was incorrect. SSA recorded the Social Security number of another individual who was receiving an SSI payment on the MBR. After our review, SSA corrected the Social Security number on the MBR. As of January 2017, this individual was not receiving a Social Security payment.

### *The Agency's Review of Sample Items*

In November 2015, we provided SSA OASDI overpayment information for 15 individuals. We requested SSA (1) review the overpayments to confirm the OASDI overpayments were available for CPR and (2) provide why it did not use CPR to collect the overpayments. In February 2016, SSA reported the OASDI overpayments, totaling \$31,659, for the 15 individuals were available for CPR as of October 2015.

Agency staff stated mandatory CPR did not occur because

- there were no alerts for CPR when (a) the individual received SSI payments after the collection of the OASDI overpayment was terminated and (b) individuals were making regular installment payments or
- the Agency did not take action on the system alert to review the overpayment.

In April 2016, we provided the Agency overpayment information for the remaining 35 individuals we reviewed.

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<sup>25</sup> We calculated the average period based on the date OASDI overpayments were eligible for mandatory CPR. Therefore, we used the latest of five dates: (1) April 25, 2013, SSA's implementation of mandatory CPR of OASDI overpayments; (2) date OASDI benefits terminated; (3) date of receipt of SSI payments; (4) date of full recovery or waiver of SSI overpayments; or (5) date of last overpayment action on ROAR. We calculated the average period through October 29, 2015.

We reviewed SSA's records regarding the OASDI overpayments of the 49 individuals in our sample eligible for CPR. As of March 2017, the Agency initiated CPR actions to collect \$89,655 in overpayments for 37 individuals. In addition, CPR was no longer available for 12 individuals with OASDI overpayments totaling \$168,259.<sup>26</sup> See Table 2 for a summary of the Agency's collection actions for the 49 individuals we determined were eligible for CPR and provided for its review.

**Table 2: Agency Actions for OASDI Overpayments Eligible for CPR as of March 2017**

Agency Actions	Overpayments Provided to the Agency November 2015	Overpayments Provided to the Agency April 2016	Total
CPR Initiated	11	26	37
CPR No Longer Available	4	8	12
<b>Total</b>	<b>15</b>	<b>34</b>	<b>49</b>

The Agency could have used mandatory CPR to collect \$257,914 in OASDI overpayments from the SSI payments of 49 of the 50 individuals we reviewed. Based on our sample results, we estimate the Agency could have imposed mandatory CPR to collect about \$52.9 million in OASDI overpayments from the SSI payments of the remaining 11,268 individuals we identified.<sup>27,28</sup> As of February 2017, we identified 9,310 individuals with OASDI overpayments that remained potentially available for CPR.<sup>29</sup>

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<sup>26</sup> For 12 of the 49 individuals, CPR was no longer available as of March 2017 because the individuals were subsequently entitled to OASDI benefits, were no longer receiving an SSI payment, or had filed or received a waiver of the overpayment.

<sup>27</sup> As of October 2014, these individuals met our screening criteria indicating their OASDI overpayments were eligible for CPR. See Appendix C for more information.

<sup>28</sup> Agency staff reported that, if it does not administer CPR correctly or fully pursue CPR when it is applicable, SSA has other external collection efforts available to collect a delinquent debt from a terminated individual.

<sup>29</sup> As of February 2017, we removed 1,958 individuals who were deceased, no longer had OASDI overpayments, receiving OASDI benefits, and no longer receiving SSI payments.

## Mandatory CPR to Collect SSI Overpayments

We reviewed a sample of 50 individuals who had SSI overpayments, totaling \$248,166. SSA did not use mandatory CPR to collect the SSI overpayments for the 50 individuals. The overpayments were available for CPR for an average of 7 years.<sup>30</sup> For the sample of overpayments reviewed, SSA could have used mandatory CPR, but it did not. SSA had no on-going collection effort for 19 individuals and suspended collection efforts for 31. According to SSA's policy, if the overpaid individual becomes eligible for OASDI benefits, the Agency will recover the overpayment from those benefits.<sup>31</sup>

See Table 3 for a summary of the SSI overpayments collection actions.

**Table 3: SSI Overpayment Collection Actions Recorded on SSR  
as of October 2014**

SSA's Collection Actions	Number of Individuals	Amount of SSI Overpayment
No Ongoing Collection Efforts	19	\$99,325
Collection Suspended Because Individuals Were Unwilling to Pay <sup>32</sup>	19	\$112,798
Collection Suspended Because Individuals Were Unable to Pay	3	\$19,362
Collection Suspended Because Individuals Were Out of Country/Cannot be Located	7	\$8,823
Collection Suspended Because the Overpayment Was Referred to Another Agency	2	\$7,858
<b>Total Available for CPR</b>	<b>50</b>	<b>\$248,166</b>

For 19 individuals (38 percent), there were no ongoing collection efforts. As of October 2014, the overpayments totaled \$99,325. These overpayments had been available for mandatory CPR for 1 to 11 years. Had SSA used CPR, we estimate SSA could have collected about \$36,035 of the SSI overpayments as of October 2015.

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<sup>30</sup> We calculated the average period based on when OASDI overpayments were eligible for mandatory CPR. Therefore, we used the latest of five dates: (1) February 2002, SSA's implementation of mandatory CPR of SSI overpayments; (2) the date SSI payments terminated; (3) the date of receipt of OASDI benefits; (4) the date of full recovery or waiver of OASDI overpayments; or (5) the date of last overpayment action on SSR. We calculated the average period through October 29, 2015.

<sup>31</sup> SSA, POMS, SI 02220.050 A.4. (February 27, 2014).

<sup>32</sup> During our review, we determined two individuals had overpayments totaling an additional \$4,164 that were available for CPR as of October 2014. We later added the additional dollars to the audit population. See Appendix C for the population potentially eligible for CPR.

For 29 individuals (58 percent), SSA suspended non-CPR collection efforts because the individuals were unwilling to pay, were unable to pay, or could not be located. For example, SSA suspended collection efforts on October 30, 2006 for one individual who was unable to repay the SSI overpayment. As of October 22, 2014, the individual's \$14,734 overpayment remained on the SSR and available for collection. However, this individual received an \$11,043 underpayment in May 2010 for OASDI benefits for November 2007 through April 2010 and began receiving monthly OASDI benefits in June 2010. Since the overpayment remained available for collection, the Agency could have used CPR to collect the SSI overpayment from the OASDI underpayment and the individual's monthly OASDI benefits. Had the Agency used CPR, it would have collected about 95 percent (\$14,036) of the SSI overpayment as of October 2015.

For two other individuals, the SSR indicated SSA had suspended collection efforts because it referred the overpayments to another agency. One overpayment, totaling \$1,968, was available for CPR for about 10 years and the other overpayment, totaling \$5,890, was available for CPR for about 7 years.<sup>33</sup> Had SSA used CPR, we estimate it would have collected about \$7,321 of the SSI overpayments by October 2015.

### *The Agency's Review of Sample Items*

In November 2015, we provided the Agency the SSI overpayment information for 16 of the 50 individuals we reviewed. We included data for the two individuals whose overpayments SSA referred to another agency. We requested SSA review the overpayments to (1) confirm whether the SSI overpayments were available for CPR and (2) provide information about why CPR was not used to collect the overpayments. In February 2016, SSA reported that all the overpayments, totaling about \$82,818, were available for CPR.

Agency staff stated mandatory CPR did not occur because

- SSA's systems did not generate an alert directing staff to impose CPR when (a) individuals became entitled to OASDI benefits, (b) SSRs were terminated before the mandatory CPR was implemented in 2002, or (c) staff failed to transfer the SSI overpayment from a terminated SSR to a new SSR;
- there was incorrect coding on the SSR that would affect collection efforts; or
- there were various system limitations for automated CPR.

In April 2016, we provided the remaining 34 individuals to the Agency for review.

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<sup>33</sup> See Footnote 30 for how we calculated the availability for CPR.

We reviewed SSA's records for the 50 individuals in our sample. As of March 2017, the Agency had initiated CPR actions to collect \$193,215 in overpayments for 43 individuals. In addition, CPR was no longer available for seven individuals with SSI overpayments totaling \$54,951.<sup>34</sup> See Table 4 for a summary of the Agency's collection actions.

**Table 4: Agency Actions for SSI Overpayments Eligible for CPR as of March 2017**

Agency Actions	Overpayments Provided to the Agency in November 2015	Overpayments Provided to the Agency in April 2016	Total
CPR Initiated	15	28	43
CPR No Longer Available	1	6	7
<b>Totals</b>	<b>16</b>	<b>34</b>	<b>50</b>

The Agency could have used mandatory CPR to collect \$248,166 in SSI overpayments from the OASDI benefits of the 50 individuals we reviewed. Based on our sample results, we estimate the Agency could have imposed mandatory CPR to collect about \$33.5 million in additional SSI overpayments from the OASDI benefits of the remaining 9,364 individuals we identified.<sup>35</sup> As of February 2017, we identified 7,626 individuals with SSI overpayments that remained potentially available for CPR.<sup>36</sup>

## Transfer of SSI Overpayments to the Current SSR

We found SSI overpayments for 130 individuals were recorded on terminated SSRs. The overpayments were not available for CPR because the individuals were receiving SSI payments on the current SSR.<sup>37,38</sup> Had SSA transferred the SSI overpayments from the terminated SSRs to the current SSRs, it could have pursued collection using other types of overpayment recovery efforts. SSA policy states "... failure to close out an overpayment on a terminated record and

<sup>34</sup> For 7 of the 50 individuals, CPR was no longer available as of January 2017 because a waiver was filed for the SSI overpayment, the individuals began receiving SSI payments, the individual died, or the individuals were no longer receiving OASDI benefits.

<sup>35</sup> Refer to Footnote 28.

<sup>36</sup> As of February 2017, we had removed 1,738 individuals with SSI overpayments who were deceased, receiving SSI payments, no longer receiving OASDI benefits, and whose SSR indicated CPR was occurring.

<sup>37</sup> We reduced our population of SSI overpayments potentially eligible for CPR by 130 individuals. See Appendix C for further discussion on our sampling methodology.

<sup>38</sup> In prior audits, we identified other outstanding SSI overpayments that had not been transferred to the current record and pursued for collection from current payments. SSA OIG, *Controls over Recording Supplemental Security Income Overpayments* (A-01-00-10005), p.11, May 2001 and SSA OIG, *Follow-up: Controls over Recording Supplemental Security Income Overpayments* (A-01-09-19126), p. 5, August 2009.

transfer it to the current record results in a lost opportunity to recover the overpayment. Adjustment of ongoing payments is the most effective method of overpayment recovery.”<sup>39</sup>

As of August 2016, SSA had transferred 24 overpayments to the current SSR and recovered or removed 6 overpayments from the terminated SSR. The SSI overpayments for 43 individuals were no longer available for transfer to the current SSR, and 13 individuals had died since October 2014. However, SSA had not transferred SSI overpayments to 87 individuals’ current SSRs and was not pursuing collection efforts for these overpayments.

In September 2016, we provided the Agency the information of 87 individuals whose SSI overpayments should be transferred from the terminated SSRs to the current SSRs and for whom it should pursue collection efforts to recover the overpayments, as appropriate. The Agency informed us it took the necessary action for the 87 individuals. We reviewed the SSRs and found the Agency removed overpayments for 2 individuals and transferred the overpayments for 85 individuals to their current SSRs, totaling \$297,131. As of January 2017, SSA had initiated collection efforts for the 85 individuals.

## Update SSR for CPR and Other Collection Efforts

We identified two individuals whose ROAR information indicated SSA used CPR to recover the SSI overpayments and the overpayment balances were zero.<sup>40</sup> However, SSA did not update the SSR to document the full recovery of the overpayment for one individual, and did not reestablish collection efforts for the SSI overpayment after SSA recovered the OASDI overpayment for the other. We identified similar conditions for 1,443 individuals by obtaining CPR information from the ROAR and comparing it to information recorded on the SSR. The overpayments totaled about \$4.4 million.

We provided SSA with information on the SSI overpayments for the 1,445 individuals. As of March 2017, SSA reported it had reviewed 1,314 individuals. Agency staff reported overpayments totaling \$2.9 million for 967 individuals were available for collection.<sup>41</sup> Staff also reported the SSI overpayments for 222 individuals were no longer available for collection.<sup>42</sup> For

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<sup>39</sup> SSA, POMS, SI 02220.011 A. (December 3, 2012).

<sup>40</sup> The zero overpayment balance indicated either full recovery of the SSI overpayment using CPR, or it could no longer impose CPR to collect the overpayment. According to SSA, CPR was no longer available because the individuals had either (1) an OASDI overpayment or (2) a new SSR.

<sup>41</sup> The Agency reported it updated the SSRs to pursue collection efforts through CPR, installments, and from individuals’ SSI payments.

<sup>42</sup> The Agency reported that collection efforts were no longer available because there was no outstanding overpayment or the individuals were deceased; were no longer receiving OASDI benefits; filed for bankruptcy; or filed for or received a waiver of the overpayment.

the remaining 125 individuals, staff reported collection efforts had been ongoing.<sup>43</sup> See Table 5 for actions taken by the Agency.

**Table 5: Agency Actions for SSI Overpayments**

Agency Actions	Number of Individuals	Overpayment Amount
Initiated Collection Efforts	967	\$2,927,246
Collection Efforts No Longer Available	222	\$584,757
Ongoing Collection Efforts	125	\$491,935
<b>Total</b>	<b>1,314</b>	<b>\$4,003,938</b>

In response to information provided by SSA, we reviewed a collection effort it initiated and found the Agency staff reestablished CPR on an overpayment it previously recovered. Had SSA updated the SSR to document its use of CPR to fully recover the SSI overpayment, the Agency would not have pursued collection efforts. We brought this to the attention of Agency staff. Staff stated it would update the SSR to stop recovery.

As of March 2017, SSA had not reviewed the SSI overpayments, totaling \$382,369, for 131 individuals. These overpayments are potentially eligible for CPR or other collection efforts.

## Prior CPR Report and SSI Overpayments

Our 2007 report identified 1,502 individuals who were receiving OASDI benefits and who had SSI overpayments. We recommended SSA review these individuals to determine whether it should use mandatory CPR.<sup>44</sup> See Appendix A for a summary of our 2007 report.

Agency staff indicated SSA completed its review of the 1,502 individuals in November 2009. As of October 2015, we found SSI overpayments for 11 of those individuals, totaling \$15,458, remained available for collection using CPR. We also identified three individuals who had overpayments totaling \$1,036 whose SSRs were not updated to document SSA's use of CPR to recover the SSI overpayments. In October 2015, we provided information about the overpayments to SSA. As of January 2017, SSA had initiated CPR for nine individuals and waived the overpayment for one. Also, one individual died, and the SSI overpayment was no longer available for CPR.

For the three individuals whose SSRs needed an update, SSA staff reported the SSRs were not updated because staff added incorrect codes to the SSRs. In November 2015, SSA updated the three SSRs to collect the overpayments.

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<sup>43</sup> Staff reported the Agency was pursuing collection efforts for 94 individuals before we provided information about the SSI overpayments in September 2016. For the other 19 individuals, SSI payments began and SSA resumed collection of the applicable overpayments.

<sup>44</sup> SSA OIG, *Cross-Program Recovery of Benefit Overpayments* (A-13-06-16031), pp. 6 through 8, June 2007.

## **CONCLUSIONS**

The SSPA provided SSA additional authority to recover OASDI overpayments from SSI payments and reaffirmed the Agency's authority to collect SSI overpayments from OASDI benefits. SSA did not exercise its authority to impose mandatory CPR in all cases we identified. As of October 2015, we had reviewed overpayments for 100 individuals and found SSA could have used CPR to collect approximately \$506,080 of OASDI and SSI overpayments for 99 individuals.

We provided the overpayment information of 99 individuals to the Agency for corrective action. As of March 2017, SSA had initiated CPR actions to collect \$282,870 in overpayments for 80 individuals. However, overpayments for 19 individuals were no longer available for CPR.

Based on our sample results, we believe the remaining 20,632 individuals with about \$86.4 million in OASDI and SSI overpayments may be available for mandatory CPR. As of February 2017, we had identified 16,936 individuals who remained potentially eligible for mandatory CPR. By not fully using its CPR authority, SSA missed the opportunity to recover overpayments from individuals receiving payments from another SSA-administered program.

Finally, we provided the Agency information concerning 87 individuals whose SSI overpayments should have been transferred from terminated SSRs to current SSRs and collection efforts pursued, as appropriate. The Agency removed overpayments for 2 individuals and transferred the overpayments for 85 individuals—totaling \$297,131—to current SSRs. We also provided the Agency information regarding an additional 1,445 SSRs that needed additional action. As of March 2017, the Agency reviewed 1,314 SSRs and pursued collection efforts from 967 individuals, totaling about \$2.9 million. The remaining 131 individuals with SSI overpayments, totaling \$382,369, are potentially available for collection.

## **RECOMMENDATIONS**

We recommend SSA:

1. Review the remaining 16,936 individuals we identified with OASDI and SSI overpayments to determine whether mandatory CPR should occur and begin recovery efforts for all applicable overpayments.
2. Consider establishing automated alerts to notify staff to review certain overpayments when CPR should be used to collect overpayments.
3. Review the remaining 131 SSRs we identified with SSI overpayments and update the SSRs to document full recovery of the overpayments or pursue collection through CPR or other collection efforts, as applicable.

## AGENCY COMMENTS

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

A handwritten signature in black ink, appearing to read "Rona Lawson".

for

Rona Lawson  
Assistant Inspector General for Audit

# *APPENDICES*

## **Appendix A – PRIOR OFFICE OF THE INSPECTOR GENERAL AUDIT, *CROSS-PROGRAM RECOVERY OF BENEFIT OVERPAYMENTS* (A-13-06-16031)**

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In June 2007, we issued a report on *Cross-Program Recovery of Benefit Overpayments*.<sup>1</sup> The objective of the audit was to review the Social Security Administration's (SSA) actions pertaining to cross-program recovery (CPR) of benefit overpayments as authorized by the *Social Security Protection Act of 2004* (SSPA).

### **Findings and Recommendations**

The Agency did not fully implement CPR authority under SSPA. Specifically, SSA did not collect Old-Age, Survivors and Disability Insurance (OASDI) overpayments when individuals received Supplemental Security Income (SSI) payments. As of March 2007, SSA's plans only addressed using CPR authority to offset overpayments from underpayments. The Agency had not decided to collect OASDI overpayments from monthly SSI payments. Since SSA did not fully implement CPR, it missed opportunities to reduce monthly payments it made to individuals who owed SSA a debt. We estimated, as of May 2006, about 1,440 individuals receiving SSI payments had about \$8 million in OASDI overpayments available for CPR.

In addition, we found SSA did not always collect SSI overpayments using CPR, as required by existing SSA policy. In February 2002, SSA implemented mandatory CPR, and SSPA reaffirmed the Agency's authority to collect SSI overpayments from OASDI benefits. We identified 1,502 individuals who received OASDI benefits but who had SSI overpayments and SSA did not use CPR to collect the SSI overpayments. In addition, we found if the Agency had implemented appropriate policies, procedures, and information systems support, it could have effectively and efficiently used CPR as a debt collection tool for OASDI overpayments. We estimated, as of May 2006, about 30,000 individuals receiving OASDI benefits had about \$13.4 million in SSI overpayments available for CPR.

We made three recommendations to address our findings, and the Agency generally agreed with each. Below are our recommendations and actions SSA took to address each.

1. Implement the authority to use CPR to collect OASDI overpayments.
2. Comply with its policy for mandatory CPR of SSI overpayments.
3. Review the individuals we identified that had SSI overpayment indicators and were receiving OASDI benefit payments, to determine whether mandatory CPR should occur.

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<sup>1</sup> SSA OIG, *Cross-Program Recovery of Benefit Overpayments* (A-13-06-16031), June 2007.

## **SSA Response to Recommendations**

To address Recommendation 1, the Agency implemented recovery of OASDI overpayments from SSI underpayments on August 24, 2007. In addition, on April 25, 2013, the Agency updated its policy and stated it would recover OASDI overpayments from SSI payments using a manual process.<sup>2</sup> As of July 6, 2016, SSA staff stated, “There are plans for the new Title II redesign of the debt management system to integrate with existing Title II and Title XVI systems to automate cross program recovery.”

To address Recommendation 2, SSA reported it had automated the collection of SSI overpayments from OASDI benefits. However, the Agency stated, for some cases, there was no collection by CPR because it excluded the cases from automated processing, and other cases were pending a mandatory due process. Further, SSA stated most due process actions for overpayments were automated; however, cases requiring manual due process actions were controlled by a diary system in SSA field offices. The Agency stated it had a systems proposal to automate the selection of debts that are not in the Recovery of Collection of Overpayments Process system; however, it had not funded the proposal. SSA staff stated, in Fiscal Year 2016, it began planning and analysis for the overpayment redesign project to automate the collection of SSI overpayments from OASDI benefits not controlled by the Recovery of Collection of Overpayments Process system.

Regarding Recommendation 3, the Agency indicated it completed its review of individuals who had SSI overpayments in November 2009. We discuss the results of our review of these overpayments in this report.

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<sup>2</sup> SSA, POMS, GN 02210.008 G. (April 25, 2013).

## **Appendix B – SCOPE AND METHODOLOGY**

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Our objective was to assess the Social Security Administration's (SSA) cross-program recovery (CPR) of overpayments as authorized by the *Social Security Protection Act of 2004*.

To accomplish our objective, we:

- Reviewed Federal laws and regulations as well as SSA's policies and procedures related to CPR efforts.
- Reviewed prior Office of the Inspector General and Government Accountability Office reports.
- Reviewed the Agency's actions taken to implement three prior recommendations from our June 2007 report, *Cross-Program Recovery of Benefit Overpayments* (A-13-06-16031).
- Examined information from 2 electronic data extracts from all 20 segments of the Agency's Master Beneficiary and Supplemental Security Record systems and corresponding Recovery of Overpayments Accounting and Reporting (ROAR) system and applied various screening criteria to remove individuals who were not eligible for CPR.<sup>1</sup> We identified 11,318 individuals who had an Old-Age, Survivors and Disability Insurance (OASDI) overpayment, totaling about \$53.2 million, and 9,544 individuals who had Supplemental Security Income (SSI) overpayments, totaling about \$34.2 million, as of October 22, 2014. See Appendix C for our sampling methodology.
- Selected a random sample of 50 from the 11,318 individuals identified. We determined whether the overpayment was available for CPR.
- Selected a random sample of 50 from the 9,544 individuals identified. We determined whether the overpayment was available for CPR.
- Requested SSA review the individuals we identified as eligible for CPR. We provided information regarding the 100 individuals to SSA for review.
- Quantified the amounts available for recovery, had SSA used CPR to collect OASDI and SSI overpayments.

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<sup>1</sup> Data from the ROAR were provided as of December 16, 2014.

We conducted our audit from October 2014 to March 2017 in Baltimore, Maryland. The entities audited were the Offices of the Deputy Commissioners for Budget, Finance, and Quality Management; Operations; Retirement and Disability Policy; and Systems. We determined the data used for this audit were sufficiently reliable to meet our audit objective. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## **Appendix C – SAMPLING METHODOLOGY**

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We obtained and analyzed two electronic data extracts from the Social Security Administration’s (SSA) Master Beneficiary (MBR) and Supplemental Security Records (SSR). We also obtained the corresponding Recovery of Overpayments Accounting and Reporting (ROAR) record for each data extract. The MBR extract contained 45,339 Old-Age, Survivors and Disability Insurance (OASDI) beneficiaries, and the SSR extract contained 100,321 Supplemental Security Income (SSI) recipients. Each extract indicated there was an overpayment as of October 22, 2014 on a record that was not in current pay, but the individual was receiving a Social Security payment on another SSA-administered program.

We obtained the data from all 20 segments of the MBR and SSR that met the following screening criteria, as of October 22, 2014.<sup>1</sup>

### **MBR Extract for Individuals Who Had an OASDI Overpayment**

- Individual had an OASDI overpayment on a terminated MBR.
- Individual was receiving SSI payments, and there was no SSI overpayment.
- There was no indication on the MBR, ROAR, or SSR that cross-program recovery (CPR) occurred.
- The OASDI overpayment was \$512 or more.<sup>2</sup>
- Individual was not receiving OASDI benefits on a different MBR.
- Individual was not reported as deceased.
- Individual did not have pending bankruptcies, reconsiderations, and/or waivers for the OASDI overpayment.

Based on our initial selection criteria, we identified 45,339 individuals who had OASDI overpayments. We subsequently applied additional screening criteria and removed 34,021 individuals. The remaining 11,318 individuals met all selection criteria. From this population, we selected a random sample of 50 individuals to review their OASDI overpayments. See Table C-1 for population and sample size.

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<sup>1</sup> Data from the ROAR were provided as of December 16, 2014.

<sup>2</sup> In a July 2015 report, *Cost-benefit Analysis of Processing Low-dollar Overpayments* (A-07-14-14065), p. 9, we concluded that, for some overpayments, collection was not always cost-beneficial to SSA. For purposes of this review, we assumed that any overpayment under \$512 would not be cost-beneficial for the Agency to collect.

**Table C–1: OASDI Overpayments - Population and Sample Size**

Description	Number	Amount
Population	11,318	\$53,157,728
Sample Size	50	\$259,173

For each sample, we reviewed SSA's records to determine whether the overpayment was available for CPR. We determined that 49 of 50 individuals in our sample had overpayments that were available for CPR as of October 2015. As of October 2015, SSA could have used CPR to collect the full amount of the overpayments or recovered a portion of the overpayments. We did not review the OASDI overpayments for the remaining 11,268 individuals in our population. See Table C–2 for the remaining OASDI overpayments we identified.

**Table C–2: OASDI Overpayments - Population Remaining After Sample Review as of October 2014**

Description	Number	Amount
Population	11,318	\$53,157,728
Removal of Sample Reviewed and Eligible for CPR	49	\$257,914
Removal of Sample Reviewed and Not Eligible for CPR	1	\$1,259
<b>Population Not Reviewed</b>	<b>11,268</b>	<b>\$52,898,555</b>

Based on our sample results, we estimate the Agency can use CPR to collect about \$52.9 million in OASDI overpayments from the SSI payments of the remaining 11,268 individuals we identified.

## SSR Extract for Individuals Who Had an SSI Overpayment

- Individual had an SSI overpayment on a terminated SSR.
- Individual was receiving OASDI benefits and there was no OASDI overpayment.
- There was no indication on the MBR, ROAR, or SSR that CPR occurred.
- The SSI overpayment was \$512 or more.
- Individual did not have unresolved overpayments.<sup>3</sup>
- Individual did not have overpayments that were resolved through refunds.
- Individual was not reported as deceased.

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<sup>3</sup> Overpayments and penalties on an SSR exceed the record's total amount of overpayment decisions and refunds.

- Individual was not included in the prior audit.<sup>4</sup>
- Individual did not have an overpayment decision that SSA had written-off.<sup>5</sup>
- Individuals were not *Ellender* class members.<sup>6</sup>

Based on our initial selection criteria, we identified 100,321 individuals who had SSI overpayments. We applied additional screening criteria and removed 90,777 individuals. We identified 9,544 individuals who had an SSI overpayment. We selected a random sample of 50 individuals to review their SSI overpayments. See Table C–3 for population and sample size.

**Table C–3: SSI Overpayments - Population and Sample**

Description	Number	Amount
Population	9,544	\$34,214,480
Sample Size	50	\$248,166

For each sample item, we reviewed SSA’s records to determine whether the overpayment was available for CPR. We reviewed a sample of 50 individuals and determined all were eligible for CPR as of October 2015. As of October 2015, SSA could have used CPR to collect the full amount of the overpayments or recovered a portion of the overpayments.

During our review of the sample items, we determined two individuals had SSI overpayments totaling an additional \$4,164 that were available for CPR as of October 2014. Therefore, we added the additional dollars to our audit population.

We also selected a replacement sample item for one individual because the individual was receiving an SSI payment as of October 22, 2014, and the Agency could collect the overpayment from SSI payments.<sup>7</sup> Therefore, the overpayment was not available for CPR. However, we subsequently reviewed our audit population and found an additional 129 individuals who were receiving an SSI payment as of October 22, 2014, and therefore, the SSI overpayments were not eligible for CPR. Therefore, the audit population decreased by 130 individuals—from 9,544 individuals to 9,414. See Table C–4 for reduced population after sample review.

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<sup>4</sup> SSA OIG, *Cross-Program Recovery of Benefit Overpayments* (A-13-06-16031), June 2007.

<sup>5</sup> SSA implemented a January 1997 Commissioner’s decision to write off erroneous and uncollectible SSI debts. *Social Security Accountability Report for Fiscal Year 1997*, p. 60.

<sup>6</sup> The *Ellender* court case is a class action suit brought in the early 1980s regarding SSA’s use of voluntary CPR in the State of New York. See *Ellender v. Schweiker*, 575 F. Supp. 590 (S.D.N.Y. 1983). Because of settlement activity in the *Ellender* case, SSA does not impose mandatory CPR against these individuals. SSA, POMS, SI 02220.020 A. 8. (April 1, 2014).

<sup>7</sup> The SSI overpayment was on a terminated SSR. SSA had not transferred the overpayment to the current SSR on which the individual was receiving SSI payments. See section Transfer of SSI Overpayments to the Current SSR for a more detailed discussion.

**Table C-4: SSI Overpayments - Population Potentially Eligible for CPR**

Description	Number	Amount
Population	9,544	\$34,214,480
Removal of Overpayments Not Eligible for CPR	130	\$443,639
<b>Population Potentially Eligible for CPR</b>	<b>9,414</b>	<b>\$33,770,841</b>

We did not review the SSI overpayments for the remaining 9,364 individuals in our population. See Table C-5 for the remaining SSI overpayments we identified.

**Table C-5: SSI Overpayments - Population Remaining After Sample Review**

Description	Number	Amount
Population Potentially Eligible for CPR	9,414	\$33,770,841
Removal of Sample Reviewed and Eligible for CPR	50	\$248,166
Additional Overpayment Amount Identified During Sample Review		\$4,164
<b>Population Not Reviewed</b>	<b>9,364</b>	<b>\$33,526,839</b>

Based on our sample results, we estimate the Agency can use CPR to collect about \$33.5 million in SSI overpayments from the OASDI benefits of the remaining 9,364 individuals we identified.

## **Appendix D– AGENCY COMMENTS**

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### **SOCIAL SECURITY**

#### **MEMORANDUM**

Date: March 27, 2017 Refer To: S1J-3

To: Gale S. Stone  
Acting Inspector General

From: Stephanie Hall /s/  
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, “Cross-program Recovery to Collect Overpayments” (A-13-15-15029)--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,  
“CROSS-PROGRAM RECOVERY TO COLLECT OVERPAYMENTS”**  
**(A-13-15-15029)**

**GENERAL COMMENTS**

As good stewards of taxpayer funds, and to preserve the public’s trust in our programs, we remain focused on preventing improper payments. Since fiscal year (FY) 2004, we have recovered \$37.63 billion in Old-Age and Survivors Disability Insurance (OASDI) and Supplemental Security Income (SSI) benefit overpayments. Most recently, in FY 2016, we took action to collect over 9 million OASDI and SSI benefit overpayments totaling \$3.29 billion. We take our responsibility to recover overpayments very seriously, and as such, we have a strategy in place to improve and enhance our debt recovery efforts.

**Recommendation 1**

Review the remaining 16,936 individuals we identified with OASDI and SSI overpayments to determine whether mandatory CPR should occur and begin recovery efforts for all applicable overpayments.

**Response**

We agree.

**Recommendation 2**

Consider establishing automated alerts to notify staff to review certain overpayments when CPR should be used to collect overpayments.

**Response**

We agree.

**Recommendation 3**

Review the remaining 131 SSRs we identified with SSI overpayments and update the SSRs to document full recovery of the overpayments or pursue collection through CPR or other collection efforts, as applicable.

**Response**

We agree.

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