

The Benefits Planner

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SSI'S INCOME AND RESOURCE RULES

Working With the Rules to Ensure Eligibility for Cash Benefits and Medicaid

The Supplemental Security Income (SSI) program provides cash benefits to individuals with disabilities who have limited income and resources. By contrast, the Social Security Disability Insurance (SSDI) program provides cash benefits to individuals with disabilities when a wage earner has paid into the Social Security trust fund through payroll deductions. In New York, receipt of SSI cash benefits guarantees automatic eligibility for Medicaid.

Previous issues of the *Benefits Planner* discussed the rules governing how wages affect eligibility for cash benefits and Medicaid. For example, our Spring 2001 issue explained the SSI formula for counting wages; the Fall 2001 issue explained how former SSI recipients, who lose cash benefits when wages get high enough, can retain Medicaid under the 1619(b) program. [All previous issues of the *Benefits Planner* are available on the Neighborhood Legal

Services website at www.nls.org/tocplanr.htm.] We have also explained how the new Benefits Planning, Assistance and Outreach (BPA&O) projects (see box, p. 53) can assist beneficiaries to understand these rules.

Because SSI is a needs-based program, the income and resource rules affect both initial eligibility and continuing eligibility for benefits. They also affect eligibility for continued Medicaid under the 1619(b) program. Although earned income or wages can be ignored in determining eligibility for continued Medicaid under section 1619(b), to be eligible for 1619(b) Medicaid an individual must still be "otherwise eligible" for SSI cash benefits. If the individual would be ineligible for SSI in any event because of either resources or unearned income that is too high, he or she would not be eligible for 1619(b) Medicaid. [See box, p. 50, explaining the 1619(b) program.]

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This article will summarize SSI's income and resource rules. We will explain how those rules affect eligibility for SSI, the SSI check amount, and continuing eligibility for Medicaid under section 1619(b).

THE SSI PROGRAM'S TREATMENT OF INCOME

The amount and type of income received by an individual will determine both income eligibility and the monthly benefit amount. Income is counted on a monthly basis. It is counted when it is received by the recipient, when it is credited to the recipient's account, or when it is set aside for the recipient, whichever is earliest. Generally, any money that an individual receives in a month is counted as income in that month, subject to the definition of income. If held until the following month, it is subject to SSI's resource rules.

The higher the countable monthly income, the lower the SSI check. When countable monthly income exceeds the applicable SSI base rate, the SSI benefit is reduced to zero. When this happens, the individual is not financially eligible for SSI and is not eligible for a payment. If the recipient becomes ineligible for an SSI check because of earned income, but would otherwise be eligible for an SSI payment, he or she is probably eligible for continued Medicaid under the 1619(b) program (see box on this page). Benefit payments may be resumed in the case of a 1619(b) recipient, when the individual is again eligible based on income, even if the individual was ineligible for a cash benefit for 12 months or longer.

When an individual is ineligible for SSI because of unearned income (or earned income that is too high for 1619(b) eligibility), but would otherwise be eligible for SSI payments, eligibility will be suspended rather than terminated. Benefit payments may be resumed without a new application when the individual is again eligible based on income, unless the suspense period continues for 12 consecutive months. In the latter case, a new application would be required to establish SSI eligibility.

Income Defined

Income is anything an individual receives in cash or in-kind that can be used either directly, or indirectly (e.g., by selling), to meet basic needs for food, clothing or shelter. 20 C.F.R. § 416.1102. This broad definition includes cash, wages, government benefits, and food, clothing or

SECTION 1619(b) MEDICAID

Special Rules Allow Former SSI Recipients to Keep Medicaid After Losing SSI Due to Wages

Section 1619(b) allows a working SSI disability recipient to remain eligible for Medicaid when earnings become too high to allow SSI cash payments. For example, in 2002 an individual who lives alone and receives SSI at the monthly rate of \$632 would lose SSI if gross wages are \$1,349 or more per month. In New York, for calendar year 2002, if the gross annual wages of a former SSI recipient are less than \$33,294, the individual will continue to be eligible for Medicaid. Some former SSI recipients can retain Medicaid at even higher levels of income when their medically related expenses are high enough. [See Fall 2001 issue of the *Benefits Planner* for a more detailed discussion of section 1619(b).]

The 1619(b) provisions are important because many employers either do not provide health insurance or the insurance they do provide does not cover expensive items like home health care services or prescription drugs. The 1619(b) provisions are also important because they allow an individual to retain their SSI status or a connection to SSI. This means, for example, that a 1619(b) recipient who lives alone can return to cash benefits status when their gross wages fall below \$1,349 per month.

If you have questions about section 1619(b), call the Work Incentives Support Center's technical assistance line, toll free, at 1-888-224-3272.

shelter provided by someone else. To calculate whether an individual is eligible for SSI, we must determine the amount and type of their income, and determine what part of it is "countable." The countable income will be subtracted from the appropriate SSI rate to calculate the monthly SSI check. New York's 2002 SSI rates are: \$632 for persons who live alone, \$568 for persons who live with others and share expenses, and \$386.34 for persons who live with others but do not contribute to household expenses. These are called "base rates," since SSI often supplements other forms of income.

SSI's Treatment of Earned and Unearned Income

The Social Security Administration (SSA) classifies income as earned or unearned. Each type of income is treated very differently. The SSI pro-

gram will allow a \$20 disregard from unearned income to determine what is subtracted from the base rate. By contrast, it will disregard the first \$65 of earned income (\$85 if there is no unearned income) and 50 percent of remaining earned income. What is left is subtracted from the base rate.

Earned income is income from work, including gross wages, salary and tips. It also includes net earnings from self-employment. Sheltered workshop wages are classified as earned income and must be considered in determining SSI income eligibility and benefit amount.

If an SSI recipient works, the first \$65 earned each month is not counted (or \$85 if there is no unearned income). The SSI check is then reduced by \$1 for every additional \$2 in gross monthly wages. For example, a recipient with gross monthly wages of \$385 and no unearned income would have his or her benefit amount calculated as follows. First, as there is no unearned income, the first \$85 would not be counted leaving \$300 in countable wages. Second, the countable income would be reduced by \$150, half of the remaining gross wages. Thus, an individual living alone would have his or her \$632 SSI check reduced by \$150 ($632 - 150 = 482$) when they have \$385 in gross monthly wages. Using the same formula, an individual with \$685 in gross monthly wages will have \$300 in countable income and receive a \$332 SSI check.

Proponents of a more generous earned income exclusion argue that this “one-for-two” reduction is not enough of an incentive to encourage many SSI recipients to work. The exclusion may not totally cover the extra expenses many incur to work, including payroll taxes, transportation, new clothing, and child care. In some cases, the current earned income exclusions are also offset by reductions in other public benefits, such as welfare benefits, food stamps and housing subsidies, which are caused by increased earnings. (See the Spring 2001 issue of the *Benefits Planner* for an explanation of special SSI rules being tested in the *NY Works* research demonstration project in Erie County and New York City. For example, for *NY Works* participants the first \$65 and 75 percent of remaining earned income will be disregarded in calculating the SSI check amount.)

In addition to the \$65 plus 50 percent of remaining earned income that is always disregarded, the SSI program will also disregard: im-

pairment related work expenses; blind work expenses; income that is set aside in an approved Plan for Achieving Self Support; and, in the case of students under age 22, up to \$1,320 per month and \$5,340 per year as a student earned income exclusion.

Unearned income is income from non-work sources, including Social Security benefits, child support, alimony, interest on bank accounts, annuities, Veteran’s Administration benefits, workers’ compensation, and unemployment insurance benefits. It also includes gifts, inheritances and income “deemed” from a responsible parent or spouse. Finally, rental income that cannot be considered a part of a trade or business is unearned income.

The SSI program will allow a \$20 per month general or unearned income exclusion. The balance of unearned income reduces the SSI payment dollar for dollar. For example, an individual who lives alone and receives \$385 per month in unemployment insurance benefits (UIB) will receive a \$267 SSI supplement. The SSI program will disregard the first \$20 of UIB ($385 - 20 = 365$) and subtract the remaining \$365 from the base rate ($632 - 365 = 267$) to determine the SSI check amount. If the same individual receives \$685 in UIB, the SSI check would be reduced to \$0 per month. Using the same formula, SSI would reduce the countable income from \$685 to \$665. Since \$665 is higher than the \$632 base rate, the individual is not entitled to an SSI check.

Income deeming is the process of considering a portion of another person’s income as the unearned income of an SSI recipient for the purpose of determining eligibility and payment amount. Deeming is an attempt to recognize societal duties of support between persons in a given relationship, i.e., spouse-to-spouse, parent-to-child, and

SSI’S REGULATIONS GOVERNING INCOME AND RESOURCES

Income regulations: 20 C.F.R. §§ 416.1100 - 416.1124.

Resource regulations: 20 C.F.R. §§ 416.1201 - 416.1266.

even stepparent-to-stepchild. The deemed income reduces the SSI benefit of the recipient, or eliminates financial eligibility, depending on the amount. The premise is that these recipients have less need for SSI.

Unfortunately, the deeming rules apply regardless of whether the income of the deemor is actually available to the SSI recipient, making deeming a very harsh rule in some cases. For example, a stepparent who lives with an SSI recipient stepchild will have his or her income considered available, or deemed to the stepchild without considering whether the stepparent is paying out hundreds of dollars each month in child support and alimony payments based on a previous marriage. Keep in mind that deeming will not apply when the spouse, parent, or stepparent does not reside in the same household as the SSI recipient. Also, keep in mind that the parent or stepparent's income will no longer be deemed once a child is 18 years old.

SSI'S TREATMENT OF RESOURCES

Resources are defined as "cash or other liquid assets or any real or personal property that an individual (or spouse, if any) owns and could convert to cash to be used for his or her support and maintenance." 20 C.F.R. § 416.1201. The individual must have an ownership interest in the property, a legal right of access to the property, and the legal ability to use it for personal support and maintenance before an asset will be considered a resource. The resource is counted or excluded "as of the first moment of the month." *Id.* § 416.1207(a). SSI eligibility for an individual or a couple depends in part on their resources. The general rule is that an item received in a month is income and, unless spent, becomes a resource in the following month. *Id.* § 416.1207(d).

If an individual has no more than \$2,000 in countable resources, or a couple has no more than \$3,000 in countable resources, the individual or couple is within the resource limit. These resource limits make it difficult for individuals to save money for things that will allow them to become more independent.

Liquid resources are cash or other property which can be converted to cash within 20 working days. Some types of liquid resources include stocks, bonds (U.S. Savings Bonds are not considered a resource during the six-month minimum retention period), promissory notes, mortgages, the cash surrender value of life insurance policies

with a face value of more than \$1,500, and bank accounts.

Nonliquid resources are property which is not cash and which cannot be converted to cash within 20 working days. Except for automobiles, the equity value of the nonliquid resource is countable. Some types of nonliquid resources include household goods, automobiles, trucks, tractors, boats, machinery, livestock and buildings, and land.

Both liquid and nonliquid resources are, with some exceptions, valued at equity value, rather than market value. Equity value is defined as "the price that item can reasonably be expected to sell for on the open market in the particular geographic area involved, minus any encumbrances." *Id.* § 416.1201(c)(2). In other words, SSA counts as a resource only the balance of money that would be left over if the individual sold the item and paid off all the debts, liens or other obligations owed on the item. For example, if an SSI recipient owns a boat appraised at \$6,000 with a \$5,000 unpaid balance on a loan that is secured by a lien on the boat, the equity value of the boat is \$1,000. In that case, the \$1,000 equity value of the boat will count toward the \$2,000 SSI resource limit for this individual.

Resources owned by more than one person may be subject to various types of ownership restrictions that may affect whether the resource is counted. For example, a husband and wife may jointly own a piece of property, and, therefore, one spouse cannot sell the property without the consent of the other. In this type of a situation, when permission to sell is withheld by the joint owner, the property cannot be included among the resources to be counted when determining SSI eligibility. If the resource, however, is a jointly held account at a financial institution, SSA applies the following presumptions of ownership:

- If both account holders are SSI recipients, SSA presumes equal shares of ownership.
- If only one of the two account holders is an SSI recipient, SSA presumes 100 percent ownership by the recipient.
- If no account holders are SSI recipients but one is an individual whose resources may be deemed to an SSI recipient, SSA presumes equal shares of ownership between the deemor and the other account holder.

SSA allows the holders of joint accounts to re-

Benefits Planning Assistance & Outreach Projects in New York

The following are the Benefits Planning, Assistance and Outreach (BPA&O) projects serving New York State and the contact persons for each office. The BPA&Os are funded by the Social Security Administration and are available to inform SSI and SSDI beneficiaries of the work incentives available to them and how going to work will affect their SSI, SSDI, Medicaid, or Medicare benefits.

Resource Center for Independent Living	Connie Angelini	315-797-4642	401-409 Columbia Street, P.O. Box 210, Utica, NY 13503-0210
Research Foundation for Mental Hygiene ("Brooklyn Works")	Olga Ivnitsky	718-368-7923	NY State Department of Labor 17-17 Avenue Z Brooklyn, NY 11235
Neighborhood Legal Services of Buffalo, Inc.	Krista McDonald	716-847-0650	295 Main Street, Room 495, Buffalo, NY 14203
Abilities, Inc., National Center for Disability Services	Leslie Monsen	516-465-1522	201 I.U. Willets Road, Albertson, NY 11507
Barrier Free Living, Inc.	Angela Caula	212-677-6668	270 East Second Street, New York, NY 10009
Queens Independent Living Center	Luis Rivera	718-515-2800	140-40 Queens Blvd., Jamaica, NY 11435
Independent Living, Inc.	Barbara Lohrke	845-565-1162	5 Washington Terrace, Newburgh, NY 12550

but SSA's ownership presumptions by providing ownership statements from other account holders, documents showing account activity, and proof that the individual has either separated his or her own funds from those of the other account holder or corrected the title of the account.

Resource Exclusions

Excluded resources are not counted in determining SSI eligibility for applicants and recipients. While there are many resource exclusions, we will focus on those most likely to affect working individuals with disabilities. For a full list, see chapter 2 of *Benefits Management For Working People With Disabilities: An Advocate's Manual* (that chapter is available on the Neighborhood Legal Services website at www.nls.org/chaptwo.htm).

The recipient's home is excluded as a resource regardless of its value. If the home is sold, the proceeds are excluded if the recipient uses them to buy another home within three months from the date of receipt of the sale proceeds.

Furniture, clothing and personal items are excluded if the total equity value is \$2,000 or less. One wedding ring and one engagement ring are excluded from the total value of personal effects as well as items or equipment required because of a person's physical condition. Generally, SSA will not ask a recipient or applicant to list possessions

to ensure that they are under the limit. A statement that there are no household items of particular value will be accepted, unless there is some contrary evidence available. Even if the personal goods are worth more than the \$2,000 exclusion, any excess is counted against the general resource limit. Thus, a recipient with no other countable resources could have personal goods worth up to \$4,000 and remain eligible.

One automobile is excluded regardless of its value if the recipient or a household member needs it for employment, for travel to medical appointments, or if it is modified for use by a person with a disability. If no automobile can be totally excluded, one automobile is excluded to the extent that its current market value (not equity value) does not exceed \$4,500. The same rule applies if one automobile is totally excluded but the family has two automobiles. Then the second vehicle would be subject to the \$4,500 limit.

SSA will not count the cash value of a **life insurance policy** if the total face value of life insurance owned by the individual (or his or her spouse) does not exceed \$1,500 per individual. The face value of a policy is the amount the beneficiary gets when the insured person dies. The cash value is the amount the insured person can get if the policy is cashed in or borrowed against.

If the face value of an individual's policy is more than \$1,500, the cash value is counted as a resource. If an individual has previously borrowed against this policy, only the cash value, minus the loan is counted. Term insurance and burial insurance are not counted as resources as they have no cash value.

SSA excludes **\$1,500 in a burial account** if the funds are set aside and kept separate from all other resources. Burial funds include revocable burial contracts, burial trusts, cash, accounts or other financial instruments with a definite cash value clearly designated for the individual's burial expenses.

SSA excludes the assets of a disabled individual set aside as necessary to fulfill **an approved plan to achieve self-support (PASS)**. The written PASS must identify an occupational goal and designate the resources the individual has for the PASS and how these resources will be kept separate from other funds. The resources excluded are counted if the individual abandons or fails to follow the conditions of the plan, completes the time schedule, or reaches the goal outlined in the plan. The use of the PASS for excluding income is discussed above. (A more detailed discussion of the PASS appears in the Summer 2002 issue of the *Benefits Planner*.)

Deeming of Resources

SSA deems resources as being available to an SSI applicant or recipient in certain situations. Deeming a resource means that the resource is considered available to the individual whether or not it actually is available. Resources are at times

deemed even when there is no legal duty to support.

Deeming from Ineligible Spouse to Eligible Individual. All the resources of an ineligible spouse over the resource limit for a couple (\$3,000) are deemed available to an SSI applicant or recipient. Only one set of exclusions apply to a family unit (one home, one automobile, household goods up to \$2,000, etc.). The pension funds of the ineligible spouse are not deemed to the eligible spouse.

Deeming from Parent or Stepparent of An Eligible Child. In determining the eligibility of a disabled child who lives with his or her parent(s) or stepparent(s), SSA combines the resources of the parents and the child. The combined resources are then subject to one set of exclusions (one home, one automobile, household goods up to \$2,000, etc.). After all exclusions are applied, countable resources over \$2,000, if one parent lives with the child, or \$3,000, if both parents live with the child, are deemed to the child. The final step is to apply the child's \$2,000 resource limit to the combination of the deemed resources and the child's own countable resources, if any. If those combined resources exceed \$2,000, the child is financially ineligible for SSI. Finally, the pension funds of the ineligible parents are not deemed available to the eligible child.

CONCLUSION

SSI's income and resource rules often come into play when SSI recipients go to work. Many recipients will struggle as they try to determine how these rules will affect their right to continue receiving cash benefits and Medicaid. This means that BPA&O and other advocacy program staff, who work with recipients, will encounter many individuals who need assistance to understand these rules so they can manage their benefits when they are working.

A very important role that BPA&Os and other advocates can play, with respect to income and resource issues, is to work with recipients and SSA to foster better communication about the changes in income and other circumstances that may lead to problems in the future. With better reporting as well as a better understanding of the income and resource rules, many overpayments or suspensions of benefits due to resources can be avoided and the associated stress imposed on beneficiaries eliminated.

WHEN TO CALL OUR TOLL-FREE LINE FOR TECHNICAL ASSISTANCE

Our State Work Incentives Support Center offers a statewide, toll-free number to call for information and technical assistance on a wide range of issues involving benefits and work. The staff of Neighborhood Legal Services is available to take calls concerning any of the topics you see discussed in these newsletters. For example, if a caller seeks information about any of the information discussed in this article, you can call us at 1-888-224-3272 for more information on these issues.

THE TECHNICAL ASSISTANCE CORNER

Living Arrangements and the Roomer/Lodger

Dear Benefits Planner: I am counseling two adults, John and Mary. Both have severe disabilities and reside in the homes of their parents. Neither has income other than SSI. John has received \$632 in monthly SSI benefits throughout 2002. Mary was receiving \$568 until July 2002 when her parents moved to a very expensive home. Since then her SSI check has been reduced to \$386.34 per month. I am very confused. Why can't Mary get paid at the same rate as John since they both live with their parents?

Each of these situations is based on the person's living arrangement. In New York State, SSI payments are usually based on three rates. For 2002, those rates are: living alone, \$632; living with others and paying fair share of household expenses, \$568; and living in the household of another, \$386.34. A person is considered living alone, even when living in the home of a parent or some other person, when he or she pays a set amount for "room rental" or for "food and shelter" (i.e., has a household unit independent of anyone else). A person is living with others when they share expenses, such as rent or mortgage, food and utilities. Mary was probably sharing expenses until her parents moved to the more expensive home.

If a person cannot possibly pay the fair share of household expenses (one half of expenses in a household of two, one third of expenses in a household of three, etc.), he or she cannot be considered "living with others." For example, if Mary's fair share in her parents' home would be \$800 per month, she could not possibly pay her share of expenses out of an SSI check. Unless Mary can establish a separate living unit, she would be considered "living in the household of another" and get paid at the \$386.34 rate.

A person like Mary can establish a separate living unit and get paid the higher "living alone" rate. Luckily, Mary can work out a business relationship under a **roomer/lodger** agreement. A roomer/lodger agreement is based on the idea that the adult with a disability is paying a flat fee amount per month for shelter costs to the homeowner or person who has rented the apart-

ment (i.e., the "lessee"). The homeowner/lessee does not necessarily have to be the parent. He or she could be another relative (other than spouse) or a friend.

Several conditions will have to be met in order for Mary to get paid at the living alone rate as a roomer/lodger [see SSA's Program Operations Manual Systems (POMS) SI 00835.120 E.]:

- The amount Mary pays to her parents must be what they would charge anyone else for the room rental or food and shelter provided.
- Mary and her parents cannot "pool" funds to pay bills and cannot "share" costs.
- Mary's name, as the roomer/lodger, cannot appear on any of the household bills (i.e., electric or gas bills).
- If Mary is paying for room rental only, not for food and shelter, she should purchase and prepare meals separately. (The separate purchase and preparation of food will be necessary if Mary wants to qualify, independently, for food stamps.)

(Note: This type of living arrangement is only feasible if the homeowner/lessee offers this arrangement to the individual. Under some financial circumstances, such an agreement may not be in the homeowner/lessee's best interest.)

Mary can change her agreement with her parents, and submit a statement from them as homeowner/lessee to the SSI program indicating how much she is charged as a flat fee per month for room and lodging (an acceptable rate might be in the \$250 range). If SSA accepts the agreement (they should under these circumstances), they will adjust Mary's SSI benefit accordingly.

For more information and/or a copy of a sample roomer/lodger agreement, call our toll-free number at 1-888-224-3272.

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The NY State Work Incentives Support Center will provide statewide services, including: training through traditional means and through use of the latest technology for distance learning; a toll-free technical assistance line, 1-888-224-3272 (English and Spanish); and a quarterly newsletter, *The Benefits Planner*. To subscribe to the Center's listserv, send your name and email address to tpg3@cornell.edu. To request a print copy of this newsletter, contact the toll-free number above.



In Our Upcoming Issues ...

- ◆ Disability Benefits and the Transition-Aged Special Education Student
- ◆ New York's Medicaid Buy-In: Health Coverage for Working Individuals with Disabilities

If you have special needs and would like *The Benefits Planner* sent in a special format, would like our Spanish version or would like the newsletter delivered by email, please call our toll-free technical assistance line, 1-888-224-3272.

Welcome to *The Benefits Planner*, a Quarterly Newsletter of The NY State Work Incentives Support Center

This newsletter will provide valuable information on how work for persons with disabilities affects government benefits, with an emphasis on the Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) work incentives. Each newsletter will contribute to an ongoing dialogue on topics related to benefits and work. Back issues will appear on the Cornell University website, www.ilr.cornell.edu/ped and on the Social Security section of the Neighborhood Legal Services website, www.nls.org.

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