Financial Policy

Volume XII
Debt Management

Chapter 1
VA Debt Collection Standards

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Interim Assistant Secretary for Management
And Interim Chief Financial Officer

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CHAPTER 1

0101 OVERVIEW .................................................................................................................. 2

0102 POLICIES .................................................................................................................... 3

0103 AUTHORITY AND REFERENCES ................................................................................... 3

0104 ROLES AND RESPONSIBILITIES .............................................................................. 4

0105 PROCEDURES ............................................................................................................. 5

0106 DEFINITIONS ............................................................................................................. 11

0107 RESCISSIONS ............................................................................................................. 14

0108 QUESTIONS ............................................................................................................... 14

0109 REVISIONS .................................................................................................................. 14

APPENDIX A ....................................................................................................................... 15
0101 OVERVIEW

This chapter provides an overview of the Department of Veterans Affairs (VA) debt collection activities and the collection standards applied to all debts owed to VA, whether they are employee, medical, benefit, or vendor debts. This chapter establishes the standards for due process afforded all debtors, file documentation, financial status reports, credit reports, and subsequent actions when requested by a debtor.

Additional details on VA’s financial policies and procedures for the debt collection activities are described in the following chapters of this volume:

- Chapter 1A, Interest, Administrative Costs & Penalty Charges
- Chapter 1B, Waiver of Debts
- Chapter 1C, Compromise of Debts
- Chapter 1D, Salary Offset for Federal Employees Indebted to U.S.
- Chapter 1E, Treasury Offset Program and Treasury Cross-Servicing
- Chapter 1F, Administrative Wage Garnishments
- Chapter 1G, Referrals for Enforced Collection (Litigation)
- Chapter 1H, Suspension of Collection Action
- Chapter 1I, Termination of Collection Action & Debt Close Out
- Chapter 1J, Reporting Discharge of Indebtedness to IRS
- Chapter 1K, Records, Reports, and Accounting
- Chapter 2, Federal Accounts Receivable
- Chapter 3, Freedom of Information Act Fees
- Chapter 4, Employee Debts
- Chapter 5, Medical Debts
- Chapter 6, Benefit Debts
- Chapter 7, Vendor Debts

010101 AUTHORITY FOR DEBT COLLECTION. In accordance with 31 U.S.C. 3711, Collection and Compromise, as implemented by VA regulations 38 C.F.R. 1.910-1.929, Standards for the Collection of Claims, VA will make all reasonable efforts to recover and satisfy indebtedness in full, while ensuring due process has been afforded all debtors.

010102 APPLICATION OF DEBT COLLECTION STANDARDS. VA will pursue various collection actions on debts owed using different methods, techniques, and collection entities to assist in the collection process. As outlined in the Department of the Treasury, Financial Management Services, Managing Federal Receivables guidance and other applicable laws and regulations, VA will apply debt collection standards in all recovery efforts.
0102 POLICIES

010201 AUTHORITY FOR DEBT COLLECTION.

A. VA has the authority to make all reasonable efforts to recover debts and satisfy such indebtedness in full.

B. In accordance with 38 C.F.R. 1.921, each Administration or staff office may set threshold amounts to establish minimum debt amounts below which collection efforts will not be taken. When establishing threshold amounts, data on costs and corresponding recovery rates for debts of different types and in various dollar ranges will be used to compare the cost effectiveness of alternative collection techniques and to establish guidelines for applying the thresholds.

010202 APPLICATION OF DEBT COLLECTION STANDARDS.

A. VA will aggressively pursue the collection of all debts while ensuring the debtor is advised of his or her due process rights regarding the nature and amount of the debt through the issuance of the proper Notice of Indebtedness (NOI), also known as a demand letter, and is given the required time to repay or respond to the NOI. VA will assess interest, administrative costs, and penalty charges, as applicable, to a particular debt in accordance with 38 U.S.C. 5315 and 38 C.F.R. 1.915 for benefit debts and 31 U.S.C. 3717 and 31 C.F.R. 901.9 for nonbenefit debts.\(^1\)

B. VA will perform other actions, as necessary, in response to the debtor’s written requests, such as a request for waiver, compromise, suspension, or termination or a request for an appeal on a determination.

C. VA will pursue collection actions appropriate to the type of debt, e.g., offset or referral, when standard collection actions fail to recover the debts or the debtor does not respond.

D. VA will consider and determine the impact of the Statute of Limitations when collecting debts owed by deceased debtors.

E. VA will report discharge of indebtedness to the Internal Revenue Service (IRS), and prepare required reports on debt collection activities.\(^2\)

0103 AUTHORITY AND REFERENCES

010301 31 U.S.C. 3711, Collection and Compromise

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\(^1\) For additional details, refer to Chapter 1A, *Interest, Administrative Costs & Penalty Charges*.

\(^2\) Per 38 C.F.R. 1.944, *Discharge of Indebtedness; Reporting Requirements*. For more details, refer to Chapter 1J, *Reporting Discharge of Indebtedness to IRS*. 
010302 5 C.F.R. Part 550, Subpart K—Collection by Offset from Indebted Government Employees

010303 31 C.F.R. CHAPTER IX--Federal Claims Collection Standards (Department of the Treasury--Department of Justice)

010304 31 C.F.R. Part 900—Scope of Standards

010305 31 C.F.R. Part 901—Standards for the Administrative Collection of Claims

010306 31 C.F.R. Part 902—Standards for the Compromise of Claims

010307 31 C.F.R. Part 903—Standards for Suspending or Terminating Collection Activity

010308 31 C.F.R. Part 904—Referrals to the Department of Justice

010309 38 C.F.R. 1.910-1.929, Standards for the Collection of Claims

010310 38 C.F.R. 1.930 – 1.936, Standards for Compromise of Claims

010311 38 C.F.R. 1.940-1.944, Standards for Suspending or Terminating Collection Action


010314 VA’s Forms website

010315 Office of Financial Policy Publications Library

010316 Digital Accountability and Transparency Act (DATA Act) Pub. L. 113-101

0104 ROLES AND RESPONSIBILITIES

010401 The Assistant Secretary for Management/Chief Financial Officer (CFO) oversees all financial management activities relating to the Department’s programs and operations, as required by the Chief Financial Officers Act of 1990 and 38 U.S.C. 309. Specific responsibilities include the direction, management and provision of policy guidance and oversight of VA’s financial management personnel, activities and operations. The CFO establishes financial policy, systems and operating procedures for all VA financial entities and provides guidance on all aspects of financial management.
010402 Under Secretaries, Assistant Secretaries, Chief Financial Officers, Fiscal Officers, Chief Accountants, and other key officials are responsible for ensuring compliance with the policies and procedures set forth in this chapter.

010403 The Chief of the Finance Activity is responsible to ensure appropriate procedures are followed for the administration of the VA’s debt collection activities. Any reference to the Chief of the Finance Activity also includes the Director of the Debt Management Center (DMC), where appropriate.

010404 The Committee on Waivers and Compromises (COWC) is a decision-making panel composed of one or more members, depending upon the size of the debt and whether a two-member panel is able to reach a unanimous decision on a request for a waiver. The Committee is under the direction of and has authority vested in, the Director of a regional office.

010405 The Debt Management Center (DMC), located in St Paul, MN, is responsible for collecting debts resulting from an individual’s participation in VA’s education, pension or disability compensation programs under the DMC’s jurisdiction. The DMC consults with Veterans and their families in the management and liquidation of their benefit debts.

010406 Regional Counsels (RC) and designated staff attorneys are authorized, in any matter within the jurisdiction of VA’s General Counsel, delegated or otherwise assigned, to conduct investigations, examine witnesses, take affidavits, administer oaths and affirmations and certify copies of public or private documents. The RC is authorized to, and shall, under the guidance of the General Counsel, provide legal services, advice and assistance to VA installations within the region assigned. In any area of regulatory, assigned or delegated responsibility, the RC may delegate to staff members or other VA attorneys authority to perform, to the extent specified, any legal function under the professional direction of the RC. The RC may modify, suspend, or rescind any delegated authority.

0105 PROCEDURES

010501 AUTHORITY FOR DEBT COLLECTION. VA will take aggressive collection action on a timely basis, with effective follow-up, to collect all claims for money or property arising from activities, using every reasonable effort consistent with the nature and amount of the indebtedness. VA will ensure each debtor is provided the required NOI, time for response or payment, and notification of the subsequent procedures if the debtor believes the debt is in error, wishes to request a waiver or compromise, or does not have the ability to repay either all or part of the debt.

Refer to 38 C.F.R. 14.501, “Functions and Responsibilities of Regional Counsels,” for additional information related to the RC.
In implementing debt collection activities and applying standards, VA may give special consideration to a veteran debtor who has reenlisted or reentered active service as a result of a national emergency situation. Discretion and good judgment may also be given to a debtor who is in the military service and stationed overseas. In these latter instances where the Veteran or a family member indicates immediate repayment would create a hardship, VA may decide to defer collection and provide the debtor or family member information on the actions to take when the Veteran returns to the United States.

010502 APPLICATION OF DEBT COLLECTION STANDARDS.

A. VA will notify the debtor of his or her rights by promptly forwarding NOIs for overpayments that inform the debtor of the consequences of failing to cooperate with VA and advising the debtor of any remedies as applicable to compromise, waive, suspend or terminate collection action. VA will ensure due process by notifying the debtor of his/her right to dispute the existence or amount of a debt, or to request a waiver, compromise, or an oral hearing. VA may send only the initial collection letter when it is determined it is not cost effective to pursue further collection action. Refer to Appendix A for a few examples of current NOI form letter numbers and names and VA’s Forms Web site for NOI form letters.

1. The initial NOI and replies to debtor inquiries will explain clearly and in detail to the debtor the circumstances or reasons for establishing the indebtedness. Form letters and computer-generated letters for non-benefit debts programmed in VA’s automated financial systems or available online are maintained by VACO’s Cash and Debt Management Division in concurrence with the General Counsel (GC). In special circumstances (other than first collection letters), dictated letters by field personnel may be used when the form or computer-generated letters are not appropriate.

At a minimum, the initial NOI will contain the following information:

a. Amount of the debt;

b. Reason the debt occurred and the time period or date of the debt;

c. Debtor’s right to a copy of the debt and supporting documents;

d. Debtor’s rights and the remedies available, as appropriate to the type of debt, such as the right to

- dispute the existence or amount of a debt.
- request a waiver or a hearing.
- appeal a decision.
• request a repayment plan.

e. Debtor’s response required within 30 days to prevent adverse actions;

f. VA’s intent to charge interest, administrative costs and penalty charges as appropriate to the type of debt, when the debt becomes delinquent; and

g. VA’s intent to refer the debt for enforced collection when no action is taken by the debtor, to include to consumer reporting agencies, private collection agencies, and Treasury Offset Program/Cross-Servicing or for litigation through DOJ.

2. For all debts, the Chief of the Finance Activity will send the initial NOI to the debtor as soon as practical after the debt is established and discovered. In general, collection letter envelopes should be stamped “Address Correction Requested” and any envelopes sent out will be labeled “Do Not Forward.”

a. For debts not resulting from default of a guaranteed or direct home loan, the NOI, at a minimum, will be sent via regular postal service.

b. For debts resulting from the default of a guaranteed or direct home loan, the first NOI will be sent by certified mail – return receipt requested.

3. The Chief of the Finance Activity will send subsequent letters at no more than 30-day intervals when no response is received from the debtor.

a. Subsequent letters will include and emphasize to the debtor the consequences of not paying the debt, such as referral to consumer reporting agencies, private collection agencies, Treasury Offset Program/Cross-Servicing or for enforced collection.

b. In accordance with threshold amounts established by the Administration or staff office, the Chief of the Finance Activity will not send additional letters when a determination is made that it is not cost effective to send more than one letter and further attempts to collect the debt will not be pursued. Factors to also consider in making this determination are when a debtor’s response to the initial or second letter clearly indicates further demands would be futile or the response does not require a rebuttal, for example, the intent of the debtor to file bankruptcy.

c. For debts greater than 120 days where follow-up with the debtor has not been productive or other collection action has not been taken by the Finance Activity, the Chief of the Finance Activity will refer debts exceeding $25 to Treasury for remedy.4

4. The Finance Activity may contact debtors by telephone or arrange an interview to discuss repayment of a debt or other factors of the debt. The value of telephone or

4 For additional details, refer to Chapter 1E “Treasury Offset Program and Treasury Cross-Servicing” in this volume.
personal contact cannot be overemphasized. Telephone and personal contacts will be documented and made a part of the collection record. The documentation will be included in referrals to the COWC or other organization as supporting documentation. At a minimum, the following information will be captured:

a. date and time;

b. participants;

c. location;

d. subject(s) discussed; and

e. any agreements reached during meeting.

5. The Chief of Finance Activity is responsible for maintaining a file for each debt. It is very important to maintain an accurate and fully documented file on all debts. This file may become a critical matter in those cases where the debtor refuses to pay a debt and the case is referred to the either the RC or DOJ for litigation or other action. Case file documentation may include, but is not limited to the following:

a. NOIs with supporting documentation of the debt;

b. Correspondence sent to the debtor, to include copies or requests for additional information;

c. Correspondence received from the debtor, such as disputes, requests for waiver, compromise, appeals, hearings, suspension or termination;

d. Reports for telephone calls or personal meetings;

e. Signed installment or repayment plans;

f. Detailed determinations resulting from subsequent actions, to include appeal board decisions; or

g. Court meetings.

6. VA will obtain and analyze financial status reports and credit reports, and may schedule field examinations to determine the capability of the debtor to make payments to liquidate his or her debt.

a. The Chief of the Finance Activity is authorized to obtain credit reports for debt collection purposes on persons who are indebted to VA.
b. The Chief of the Finance Activity will use VA Form 20-5655, "Financial Status Report," for determining the feasibility for collection of debts. The form should be signed and dated by the debtor and the debtor’s spouse and included in any referral packages for enforced collection. Although completion of the form is encouraged to properly determine financial status, disclosure and signature on the form is voluntary. If the debtor declines to complete and/or sign the form, the Finance Activity will note this information in the claimant’s file. This form, or an equivalent document, is used to determine the following:

(1). Debtor’s ability to pay.

(2). Identification of any hardship factors.

(3). Appropriateness of accepting an installment payment plan in lieu of demanding lump-sum payment.

(4). Appropriateness of accepting a compromise offer.

(5). Appropriateness of suspending or terminating collection action.

c. VA may schedule field examinations, if necessary, to verify information provided on financial status reports, credit reports, and other documentary evidence, or to obtain additional financial status information.

B. In response to the debtor’s written request, the Chief of the Finance Activity will take other actions, as necessary, such as the waiver, compromise, suspension, or termination of the debt. For procedural details and delegations of authorities associated to these types of remedies, refer to the following chapters in this volume:

- Chapter 1B, Waiver of Debts
- Chapter 1C, Compromise of Debts
- Chapter 1H, Suspension of Collection Action
- Chapter 1I, Termination of Collection Action & Debt Close Out

1. The Chief of the Finance Activity will pursue collection directly from the debtor through lump-sum payments to the maximum extent possible. If a debtor is financially unable to pay the debt in one lump-sum, payment may be accepted in regular installments.

2. The Chief of the Finance Activity may agree to an installment repayment plan to recover the debt. Arrangements to pay by installments should provide for complete liquidation within a reasonable time, considering the size of the debt and the debtor’s ability to pay.\(^5\) Repayment plans should normally not extend beyond three (3) years.

\(^5\) Per 38 C.F.R. 1.914, Collection in Installments.
C. VA will pursue collection through more forceful means if all other means of collection have been exhausted or non-productive. For procedural details and delegations of authorities associated with these types of actions, refer to the following chapters in this volume:

- Chapter 1D, Salary Offset for Federal Employees Indebted to U.S.
- Chapter 1E, Treasury Offset Program and Treasury Cross-Servicing
- Chapter 1F, Administrative Wage Garnishments
- Chapter 1G, Referrals for Enforced Collection (Litigation)

1. VA may collect debts through administrative offsets in accordance with 31 U.S.C. 3716 and VA benefit offsets in accordance with 38 U.S.C. 5301 and 5314. When collecting a debt by periodic offset from VA benefit payments or other Federal payments, the amount withheld, subject to statutory limits, should be sufficient to liquidate the debt within the period that such benefit payments or other Federal payments are expected to continue.

2. If the collection of a debt via a single lump-sum payment is not possible, collection action by offset will be pursued whenever possible. Collection by offset from benefit payments is limited to the collection of debts resulting from participation in a VA benefit program. However, such offset is not limited to recovery of overpayments. An offset may be made to collect debts resulting from defaulted home loans, from the provision of medical services at a VA facility, from participation in a work-study program, or from the receipt of illegal payments made to, or on behalf of, beneficiaries (38 U.S.C. 5301, 5314).

D. Special Considerations in regards to the Statute of Limitations for Deceased Debtors. VA will pursue special procedures, depending upon whether the Statute of Limitations has expired or not, in collecting debts owed by deceased Veterans, beneficiaries and employees.

1. If the Statute of Limitations has expired:

   a. When evidence is received by VA a debtor is deceased and has an overpayment of record, VA will send a specially composed letter to the representative of the estate that it is liable for the debt.

   b. If the estate does not repay the debt, collection of the debt may be terminated, but may never be referred for litigation. For loan guaranty debts involving more than one person, debts of a decedent may be terminated, but the debts of the co-obligors will not be terminated.\(^6\)

2. If the Statute of Limitations has not expired:

\(^6\) Per 38 C.F.R. 1.933 Joint and Several Liability.
a. For debts of at least $2,000, VA will simultaneously send a letter to the clerk of the probate court of the county in which the debtor last resided and to the representative of the estate of the deceased as indicated above.

b. Where there is evidence of an estate, or assets, and the initial notification to the representative of the estate does not produce payment, VA will take prompt action to protect the interest of the Government.

1) If the account balance is less than $2,000, the debt should be terminated when reclamation action is completed and a balance still remains, or reclamation action cannot be accomplished, and more than six months have lapsed since the date of death.

2) If the balance exceeds $2,000, and not more than 11 months have lapsed since the date of death, the Chief of the Finance Activity should send a letter to the probate court to determine if an estate exists.

3) If more than 11 months have lapsed since the date of death, VA will terminate the debt, unless the account is being investigated for fraud.

c. Claim will be made upon the representative for the estate by the RC. If the representative indicates the debt will not be paid without a contest or court adjudication, the claim will be fully documented and referred to the RC for appropriate action.

d. Loan guaranty debts may be written off as to the decedent but not as to the co-obligors.

e. If the debt is under $200, only the letter to the representative of the estate will be sent. If the representative does not indicate the debt will be paid without a contest or court adjudication, the debt will be written off.

E. VA will report discharge of indebtedness to the Internal Revenue Service (IRS), as required.

VA will report the discharge of indebtedness to the Internal Revenue Service (IRS) in accordance with the requirements of 26 U.S.C. 6050P and 26 C.F.R. 1.6050P-1. When VA discharges a debt in full or in part, further collection action is prohibited. Therefore, VA should make the determination collection action is no longer warranted before discharging a debt. Before discharging a debt, VA will terminate debt collection action.

0106 DEFINITIONS

010601 Administrative Costs. Administrative costs are the average costs of collection of similar debts, or actual collection costs as may be accurately determined in the particular case.
010602 Administrative Wage Garnishment (AWG). Withholding of wages of a delinquent debtor from a non-Federal employer without first obtaining a court order to collect delinquent non-tax debt. The AWG process is authorized by 31 U.S.C. 3720D.

010603 Close-Out. The determination action that concludes a debt is no longer collectible and is terminated, and is satisfied at less than face value, or is forgiven, and has been reported to the IRS as taxable income to the debtor.

010604 Compromise. An offer and acceptance of a partial payment in settlement and full satisfaction of the offeror’s indebtedness, as it exists at the time the offer is made. It is a final settlement, binding on the parties to the compromise, unless procured by fraud, misrepresentation of a material fact or mutual mistake of fact.

010605 Debts. A claim for money made by or owed to the Government, arising out of VA activities.

A. Benefit Debts. Debts arising out of participation in a VA benefits program (e.g., compensation, education, pension, etc.) under authority of title 38 of the U.S. Code, as opposed to personal benefits associated with actual employment (e.g., health and life insurance benefits), home loan debts, medical care debts, and Homeless Providers Grant/Per Diem Program.

B. Nonbenefit Debts. Any debt that does not arise as a result of participation in a VA benefits program administered under authority of title 38 of the U.S. Code. Examples of this type of debt include salary overpayments, the recovery for the value of lost keys and books, equipment, and checks cashed at the Veterans Canteen Service which are subsequently returned marked "insufficient funds."

010606 Delinquent. In the case of most administrative debts, delinquency occurs when payment is not made by the due date specified in the initial billing notice (usually 30 calendar days from the date the notice is mailed), or an applicable agreement (including a post-delinquency payment agreement), unless other satisfactory payment arrangements have been made.

010607 Demand Letter. A notice of indebtedness provided debtors explaining the nature and amount of the debt and advising them of their due process rights.

010608 Discharge of Indebtedness. In accordance with 31 C.F.R. 903.5(a) and 38 C.F.R. 1.944(a), a "discharge" of a debt is the same as a "close-out" of the debt.

010609 Dispute. Right of a debtor to contest the legitimacy of a debt, both as to the existence and the amount.

010610 Due Process. Notice and process provided by VA to Veterans, beneficiaries, and employees regarding VA's debt collection process.
010611 Enforced Collections. The referral of a delinquent debt to the Regional Counsel or the Department of Justice for collection through litigation.

010612 Notice of Indebtedness (NOI). Written communication sent by VA to the debtor explaining the details of the debt along with the debtor’s due process rights, including the right to request a hearing and waiver of the debt. This notice advises the debtor of the timing of repayment and repayment options for paying off the debt, possible course of action to be taken by VA, and the potential effect of added interest and other late payment charges to the debt.

010613 Reclamation Action. A means by which a seller (e.g., VA) may try to reclaim goods, or other assets, that were sold and shipped to a debtor customer on credit prior to learning the customer was insolvent or deceased. Under the Uniform Commercial Code, insolvency is defined as when the debtor has ceased to pay his or her debts in the ordinary course of business, or cannot pay the debts as they become due or is insolvent within the meaning of the federal bankruptcy law.

010614 Salary Offset. Mechanism used to collect a debt under 5 U.S.C. 5514 by deduction(s) at one or more officially established pay intervals from the current pay account of any employee, member of the Armed Forces, or Reserve of the Armed Forces.

010615 Standards. A standard is an established norm or requirement which usually guides the actions of individual(s) or entities in pursuing a goal (e.g., debt collection efforts).

010616 Statute of Limitations. A statute assigning a certain time after which rights cannot be enforced by legal action or offenses may not be punished.

010617 Suspension of Collection Action. Temporary delay of collection actions on a debt owed to VA.

010618 Termination of Collection Action. Refers to a decision made to cease active collection action on a debt, in accordance with criteria set out in the Federal Claims Collection Standards, because such action is not economically worthwhile or is otherwise inappropriate.

010619 Treasury Cross-Servicing Program. Cross-servicing is a referral program consisting of collection tools including Treasury demand letters, telephone calls to debtors, and the use of one or more of the Private Collection Agencies (PCAs) on the Government-wide contract which function concurrently with the Offset.

010620 Treasury Offset Program (TOP). A centralized offset program, administered by the Treasury’s Financial Management Service (FMS) Debt Management Services (DMS), to collect delinquent debts owed to Federal agencies and States in accordance

010621 Waiver. A decision that conditions exist, under the applicable statutes (38 U.S.C. 5302 and 5 U.S.C. 5584) and implementing regulations (38 CFR 1.955-1.969, 17.105) that prohibit recovery by VA of certain debts as defined in the statutes and regulations, including interest and other late payment charges assessed on such debts.

0107 RESCISSIONS

010701 VA Handbook 4800.1, VA Collection Standards

0108 QUESTIONS

Questions concerning these financial policies and procedures should be directed as shown below:

VHA VHA Accounting Policy (Outlook)
VBA VAVBAWAS/CO/FINREP (Outlook)
All Others OFP Accounting Policy (Outlook)

0109 REVISIONS

<table>
<thead>
<tr>
<th>Section</th>
<th>Revision</th>
<th>Office</th>
<th>Reason for Change</th>
<th>Effective Date</th>
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<tr>
<td>0103 Authority and References</td>
<td>Updated to include addition of 010316 Digital Accountability and Transparency Act (DATA Act) with Link</td>
<td>OFP (047G)</td>
<td>To comply with new Law</td>
<td>July 2016</td>
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<tr>
<td>010502 Application Of Debt Collection Standards</td>
<td>Updated to reflect mandatory change of 180 days to 120 days</td>
<td>OFP (047G)</td>
<td>To comply with new Law</td>
<td>July 2016</td>
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<tr>
<td>0109 in Table of Contents and Revisions</td>
<td>Updated to include addition of Revisions within Table of Contents and REVISIONS section of policy.</td>
<td>OFP (047G)</td>
<td>To highlight chapter changes</td>
<td>July 2016</td>
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Appendix A

VA Forms Website: [http://vaww4.va.gov/vaforms/](http://vaww4.va.gov/vaforms/)

Examples of VA NOI Form Letters

Note: The examples listed below do not represent the complete list of NOI form letters.

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<th>Revision Date</th>
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<td>Current Employee Debt - Waiver Rights</td>
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<td>07/2007</td>
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<tr>
<td>FL4-520b</td>
<td>Ex-Employee Debt - Waiver Rights</td>
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<td>07/2007</td>
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<tr>
<td>FL4-520c</td>
<td>Current Employee Debt - No Waiver Rights</td>
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<td>FL4-520d</td>
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<td>FL4-520f</td>
<td>Immediate Offset-Employee Salary</td>
<td>12/11/2008</td>
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<td>FL4-520g</td>
<td>Pending Offset-Employee Salary</td>
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<td>4-520e</td>
<td>Notice of Indebtedness</td>
<td>12/11/2008</td>
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<td>4-534</td>
<td>Notice of Indebtedness Notice to Ex-Employee of Offset of Retirement Benefits</td>
<td>12/11/2008</td>
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<td>4-539</td>
<td>Notice of Indebtedness: Advance of Funds for Travel or Relocation</td>
<td>12/11/2008</td>
<td>07/2007</td>
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<td>4-540</td>
<td>Notice of Indebtedness: Advance of Funds for Travel or Relocation Ex-Employee</td>
<td>12/11/2008</td>
<td>07/2007</td>
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<tr>
<td>4-559</td>
<td>Notice of Indebtedness - Incorrect address</td>
<td>12/11/2008</td>
<td>02/2004</td>
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