



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF HEARINGS AND APPEALS
OFFICE OF ADMINISTRATIVE LAW JUDGES

400 MARYLAND AVENUE, S.W.
WASHINGTON, D.C. 20202
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In the Matter of

MM,

Respondent.

Docket No. 20-41-OF

Overpayment/Pre-offset Hearing

Appearances: [Redacted], Respondent, pro se.

Lydia T. Makande, Attorney, Office of the General Counsel, U.S. Department of Education

Before: Angela J. Miranda, Administrative Law Judge

DECISION

I. Jurisdiction and Procedural History

The Office of Administrative Law Judges has current jurisdiction over the above referenced matter.¹ On August 19, 2020, a request for a hearing in relation to this matter was filed with the Office of Hearings and Appeals (OHA).² The request indicated the Respondent had been a Federal

¹ The Department's policy is set forth in the U.S. Department of Education's Administrative Communications System, Handbook for Processing Salary Overpayments (ACSD-OFO-009, approved on January 19, 2012 and updated on July 12, 2022 and August 11, 2022). An erroneous payment to a Federal employee, or former Federal employee, creates a debt to the United States that requires collection or, in certain instances, allows waiver and various laws are available to the United States to administratively collect or waive these types of debts (5 U.S.C. §§ 5514 and 5584, 31 U.S.C. §§3711 and 3716. *See also*, Debt Collection Act of 1982 (Pub. L. 97-365, October 25, 1982), Federal Debt Collection and Procedures Act (Pub. L. 101-647, Title XXXVI, November 29, 1990), and Debt Collection Improvement Act of 1996 (Pub. L. 104-134, Section 31001, April 26, 1996)).

Historically, these administrative proceedings were the shared responsibility of the Comptroller General of the former General Accounting Office, now the Government Accountability Office, and the various Executive agencies, if the amount of the debt was below a certain dollar amount (*See, https://www.opm.gov/policy-data-oversight/pay-leave/pay-administration/fact-sheets/waiving-overpayments/*). With Passage of the General Accounting Office Act of 1996 (Pub. L. 104-316, Section 103(d)), the authority for administrative proceedings to collect or waive these types of debts was given to the Director of Office and Management and Budget (OMB). The Director of OMB redelegated this authority to the Executive Agencies by memorandum, dated December 17, 1996, and the dollar limit previously imposed for jurisdiction by the Executive agencies was eliminated (*See, https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/omb/foia/gc_dec17.pdf*.)

² The request simultaneously asked for a Waiver. A final agency decision denying the Waiver was issued under Docket Number 20-40-WA.

employee since July 2010 and onboarded with the U. S. Department of Education (Department), Federal Student Aid (FSA) in March 2020. She explained that she participated in an onboarding training and was told her health insurance benefits would automatically be transferred. Based on that representation, the Respondent assumed her health benefits transferred and she did not notice that health care premiums were not being paid or deducted from her pay. She reported that on July 20, 2020, she received an email from a Human Resource (HR) Specialist in FSA that informed her it was recently discovered that her health insurance coverage was not updated in the Department's personnel and pay system and no health premiums were being deducted from her pay. The HR Specialist requested that the Respondent confirm she was enrolled in BCBS Basic Self Plus One plan prior to her transfer and that she provide the required information for the eligible family member. The HR Specialist informed her this error will result in a debt owed to the Government, that she will be contacted by the Department's payroll agent, she will be given an opportunity to make payment arrangements, and if she does not make payment arrangements then involuntary payroll deductions will be implemented until the debt is paid in full. The Respondent was also informed the payroll agent will notify her of the asserted debt and appeal rights.

By letter dated July 27, 2020, the payroll agent issued a Notice of Debt (Notice). After the request for a hearing was received, an Order Governing Proceeding (OGP) was issued on August 27, 2020. The OGP established procedures for the hearing and explained how the hearing would be conducted. The OGP required that the Department file a complete copy of the Notice provided to the Respondent,³ a brief setting forth its basis for the asserted overpayment, and all Government records that support the asserted overpayment determination.

The OGP also advised the Respondent that the Department's regulations allowed the imposition of an involuntary repayment schedule of 15% of disposable income from each pay period until any established debt is paid in full. Therefore, the OGP allowed the Respondent an opportunity to submit a narrative or brief in response to the Department's brief and to also submit financial information in support of a claim that repayment at the involuntary repayment schedule of 15% of disposable income would result in extreme financial hardship.

Although the Department timely filed its brief and Government records in support of the asserted overpayment, the Respondent did not file any response and did not file documentation asserting financial hardship to limit involuntary repayment in the absence of a payment agreement. With the issuance of an Order to Show Cause, the Respondent was allowed one more opportunity to file a response or assert extreme financial hardship. No additional filings were received from the Respondent. This matter is ready for decision.

II. Issues

1. Whether the Department has established the debt, under Debt ID 02101792225, in the amount of \$1,250.27 is a valid debt.
2. Whether, in the absence of an acceptable voluntary repayment agreement, the Respondent has established extreme financial hardship to obtain relief from imposition of an

³ Although employees appealing an overpayment are required to include a copy of the overpayment notice with the request, historically that has not always been done, therefore, the OGP required the Department to file a full copy of the Notice.

involuntary repayment schedule of 15% of disposable income, collected from each pay period, or as otherwise authorized, until the debt is fully paid.

III. Legal Framework/Applicable Laws and Regulations

A. Debt Collection and Administrative Offset

The Federal Claims Collection Act of 1966 (Pub. L. 89-905, July 19, 1966) was enacted to avoid unnecessary litigation for the collection of claims of the United States. In its initial form, it required heads of agencies to attempt collection of all claims for money or property arising out of the activities of, or referenced to, the agencies. A subsequent act revised, codified, and enacted, without substantive change, general and permanent laws related to money and finance (Pub. L. 97-258, September 13, 1982) wherein the Federal Claims Collection Act was merged into Title 31 of the United States Code, specifically, 31 U.S.C. § 3711, collection and compromise.⁴

Consistent with the original intent of the Federal Claims and Collection Act of 1966, the current statute requires the head of an executive agency to attempt to collect a claim of the United States Government for money or property arising out of the activities of, or referred to the agency (31 U.S.C. § 3711(a)(1)). The head of the agency must act under regulations prescribed by the head of the agency and the standards that the Attorney General and the Secretary of Treasury prescribe (31 U.S.C. § 3711(d)(1) and (2)).⁵

The Department's regulations are found at Part 32 of Title 34 of the Code of Federal Regulations. Initially, using the Administrative Communications System (ACS), the Department established policy in relation to salary overpayments with the issuance of the Handbook for Processing Salary Overpayments (ACS-OM-04), hereinafter referred to as the Handbook. Revisions were made to that Handbook on January 19, 2012. On July 12, 2022, technical changes were made, and the Handbook was renumbered per the new ACS document numbering system (ACSD-OFO-009). Technical changes and updating of POC/Division references were made on August 11, 2022.

B. Notice Requirements

The initiating Federal statute for collection of a claim related to an overpayment to a Federal employee requires that the head of the agency provide notice prior to collection by administrative offset (31 U.S.C. § 3716). The statute specifically requires that the notice be in writing, identify the type and amount of the claim, the intention of the agency to collect by administrative offset, and an explanation of the rights of the debtor. The agency must provide an opportunity to inspect and copy the records of the agency related to the claim, an opportunity for review within the agency of the determination of the claim, and an opportunity to make a written agreement with the agency to

⁴ This section was subsequently amended by the Debt Collection Improvement Act of 1996 and the General Accounting Office Act of 1996.

⁵ The Attorney General and Secretary of Treasury published a notice of proposed rulemaking on December 31, 1997 (62 FR 68476-01) and the final rule was published on November 22, 2000 (65 FR 70390-01). The regulations for Federal Claims Collection Standards (FCCS) are found at 31 C.F.R. Parts 900-904. The final rule revised the FCCS issued by the Department of Justice and the General Accounting Office on March 9, 1994 and reflected changes under the Debt Collection Improvement Act of 1996 and the General Accounting Office Act of 1996.

repay the amount of the claim (*Id.*).

The Department regulations provide that the pre-offset notice be in writing, establish the origin, nature, and amount of the overpayment, how interest is charged, and how administrative costs and penalties will be assessed (34 C.F.R. § 32.3(a) and (b)). The regulations require the Department to demand repayment while providing the opportunity to enter into a written repayment agreement with the Department (34 C.F.R. § 32.3(c)). The regulations require that the debtor be advised of the right to request a waiver if waiver of repayment is authorized by law (34 C.F.R. § 32.3(d)). The regulations require that the Department identify the intention to deduct up to 15% of the employee's disposable pay to recover the overpayment if a waiver is not granted and the employee has not entered into a written repayment agreement (34 C.F.R. § 32.3(e)). The notice must specify the amount, frequency, approximate beginning date and duration of the intended deduction (34 C.F.R. § 32.3(f)). The Department is required to provide the Government records supporting the debt with the notice or advise how those records will be made available to the employee for inspection and copying (34 C.F.R. § 32.3(g)). Lastly, the regulations require that the debtor be informed of the right to request a pre-offset hearing concerning the existence of, the amount of the overpayment, or seek relief from an involuntarily imposed repayment schedule (34 C.F.R. § 32.3(h)).

The Department policy, which is mostly consistent with the requirements of the applicable statutes and Department regulations, provides further instruction as to how the Department will process salary overpayments and imposes additional requirements upon the Department. One such requirement is that the notice of any debt be served by certified mail, although this requirement is rarely followed by the Department.⁶

C. Requirement for a Hearing

The statute authorizing installment deduction for indebtedness to the United States resulting from an erroneous payment of pay and allowances, travel, transportation, and relocation expenses and allowances requires an opportunity for a hearing to challenge 1) that a debt exists, 2) the amount of the debt, or 3) in the case of an individual whose repayment schedule is established other than by a written agreement, to establish extreme financial hardship to be relieved of involuntary collection of 15% of disposable income (5 U.S.C. §5514(a)(2)(D)). The Department regulations are consistent with the authorizing statute (34 C.F.R. §§ 32.4(a) and 32.3(e)).

The authorizing statute demands that the hearing be conducted by an individual who is not under the supervision or control of the head of the agency and does not prohibit the appointment of an administrative law judge as the hearing official (5 U.S.C. §5514(a)(2)(D)).⁷ The Department's

⁶ Current Department policy and practice shows the Department generally relies on its payroll agent, the Department of Interior, Interior Business Center to issue the required notice if the employee is a current employee. Often this notice is in the form of a "Bill for Collection" (as titled by the payroll agent in some notices), "Bill of Collection" (as titled in the Department's policy), or otherwise referenced as a debt letter. In the case where the employee is not a current employee of the Department, the notice is issued by the Department, often relying on the Bill for Collection generated by the payroll agent.

⁷ This statute does not prevent a Federal agency from appointing an administrative law judge employed by that Federal agency from presiding over pre-offset hearings for an employee at that Federal agency (*See*, 7 C.F.R. § 1951.111(b)(5) (defining the Hearing Officer for cases involving USDA employees as an Administrative Law Judge of the USDA or

regulations require that the hearing be conducted by a hearing official who is not an employee of the Department or under the supervision or control of the Secretary (34 C.F.R. 32.5(d)). With the implementation of the Handbook, the Department established policy interpreting this regulation and authorized an administrative law judge employed by the Department to preside over pre-offset hearings. This policy interpretation of the Department's regulation is consistent with the intent of the initiating statute.

The authorizing statute's provision for a hearing on the existence or amount of the debt requires that the agency provide Government records to establish the agency's claim for the debt (5 U.S.C. § 5514(a)(2)(B)). The Department's regulation requires that a copy of the Government records on which the determination of overpayment was made be included with the pre-offset notice or the employee be informed how those records will be made available to the employee (34 C.F.R. §32.3(g)). As such, the agency carries the initial burden of proof to establish the existence of and amount of the alleged debt.

The Department's regulations require the hearing official to decide whether the Secretary's determination of the existence or amount of the debt is clearly erroneous (34 C.F.R. § 32.9). The Department's policy describes the "clearly erroneous" standard by referencing a standard of review that governs appellate review of district court findings.⁸ Neither the Department's regulations nor policy provide any rationale or explanation for requiring this standard of review in an administrative proceeding, which generally allows for a *de novo* review.

D. Involuntary Collection and Extreme Financial Hardship

The authorizing statutes allow the agency to involuntarily collect on an established debt by installment deduction and administrative offset from the current pay, including basic pay, special pay, incentive pay, retired pay, retainer pay, or other authorized pay (5 U.S.C. § 5514 and 31 U.S.C. §§ 3711 and 3716). Pursuant to the statute, unless otherwise agreed to, the agency must limit collection to 15% of disposable pay (5 U.S.C. § 5514 (a)(1)). The authorizing statute allows a challenge to terms of an involuntary repayment schedule upon a showing of extreme financial hardship (5 U.S.C § 5514(a)(2)(D)).

The Department's regulations are consistent with the authorizing statute (34 C.F.R. §§ 32.3(e) and 32.2). The regulations require a showing of extreme financial hardship to obtain relief from an involuntarily imposed repayment schedule (34 C.F.R. §§ 32.4(c) and 32.5(a)(2)). The regulation requiring a showing of extreme financial hardship was found to be consistent with the authorizing statute (*See, Sibley v. United States Department of Education*, 913 F. Supp. 1181 (N.D. Illinois (1995))). The Department's policy as described in the Handbook is generally consistent with the authorizing statute and the Department's regulations.

E. Health Insurance Benefits

Health care insurance for employees is provided through Federal Employee Health Benefit

another individual not under the supervision or control of the USDA)).

⁸ The Handbook relies on the "clearly erroneous" standard as described in *Anderson v. Bessemer*, 470 U.S. 564, 73-4 (1985).

(FEBH) plans identified by the Office of Personnel Management (5 U.S.C. § 8901(6)). Premiums are shared between the Federal Government and the employee (5 U.S.C. § 8906(b) and (d)). Continued enrollment is available to an employee without change when the employee moves from one employing office to another without a break in service of more than three (3) days (5 C.F.R. § 890.303(a)(1)). An employee is responsible for paying the enrollee share of the cost of enrollment for every pay period during which the employee is enrolled (5 C.F.R. § 890.502(a)(1)). An employee incurs a debt to the United States in the amount of the proper employee withholding required for each pay period during which the employee is enrolled if the appropriate health benefits withholdings or direct premium payments are not made (*Id.*).

F. Employment and Personnel Management

An executive agency has the general authority to employ individuals consistent with congressional appropriations (5 U.S.C. § 3101). The appointing authority in each executive agency is responsible for notifying the Office of Personnel Management (OPM) of various personnel actions in the competitive service, including, appointment, resignation, and transfer (5 U.S.C. § 2951). The OPM extended this reporting requirement to all civilian employees, whether competitive, excepted, or Senior Executive services (5 C.F.R. § 9.2).

The OPM provides guides for processing personnel actions (<https://www.opm.gov/policy-data-oversight/data-analysis-documentation/personnel-documentation/#url=Processing-Personnel-Actions>) and each executive agency is responsible for preparing and processing those actions consistent with the guide.

IV. Arguments

A. Respondent's Initial Request for a Hearing

In the Respondent's request for hearing, she explained she was unaware that her share of the health care premium was not being deducted. The Respondent asserts that with the transfer in employment there were other changes in her voluntary deductions that did not continue after her transfer to the Department. She assumed the increase in net pay was a result of those changes. The Respondent asserts there was no way for her know that her share of the health care premium was not being deducted and the Department's error was outside of her control. She requested that the Department reconsider seeking re-payment of the debt.

B. Department's Brief

The Department's brief confirmed the information related to the Respondent's transfer to and employment with the Department. It also confirmed that, despite the Respondent's enrollment in the FEHB at the Department of Housing and Urban Development (HUD) prior to her transfer, no payroll deductions for her health benefit premium were applied for seven pay periods between and including 2020-08 and 2020-14. These pay periods commenced after the Respondent transferred to the FSA at the Department.

The Department asserts that after the Respondent acknowledged receipt of a July 14, 2020 email,

which addressed the Department's failure to continue the Respondent's enrollment in FEHB, the Respondent provided information so that enrollment could be established as of her transfer date to the Department. Thereafter, the HR Specialist completed a Notice of Change in Health Benefits, which transferred the responsibility for Respondent's FEHB from HUD to the Department, effective March 29, 2020. The Department asserts that the payment of \$4,032.96 by the Department in pay period 15 of 2020, represents a payment of the Department's biweekly share of the premium as well as the Respondent's biweekly share of the premium for each of the pay periods beginning with pay period 8 of 2020.⁹ The Department argued that the Department's delay in processing the transfer of health benefits does not negate the validity of the asserted debt.

In support of this argument, the Department relies on 5 C.F.R. § 890.303(a)(1), which allows continuation of enrollment in a health benefit without change when an employee moves from one employing office to another without a break in service of more than 3 days. The Department also relies on 5 C.F.R. § 890.502(a)(1), which establishes that an employee is responsible for paying the enrollee share of the cost of enrollment for every pay period during which the employee is enrolled and if the appropriate health benefit premium is not withheld from an employee's pay, the employee incurs a debt to the United States in the amount of the proper employee withholding.

Furthermore, the Department notes the Respondent was aware of an increase to her pay following her transfer to Education but then asserts she had no way of knowing the increase in pay was due to her health premiums not being paid. In response to the Respondent's assertion, the Department points out that Respondent's leave and earnings statements for pay periods 8 of 2020 through 14 of 2020 clearly show that the Respondent's share of health premiums were not being withheld and that the Department had not paid its share of the health premiums for those pay periods. Finally, the Department asserts the Respondent, as a federal employee, has the ultimate responsibility to verify the accuracy of her withholdings.

V. Findings of Fact

1. The Respondent began employment with the Federal Government on July 6, 2010 and transferred to Federal Student Aid, U.S. Department of Education, effective March 29, 2020 (OES Document 6, p. 7).
2. Although eligible for continuation of her health benefit, the Department failed to properly process the continuation of the health benefit upon the Respondent's transfer to the Department (OES Document 1, p. 5).
3. An audit revealed health care premiums were not paid by the Government for pay periods 8 through 14 of 2020 (OES Document 6, pp. 13-19). During the same period, the Respondent's share of the health care premium was not withheld (*Id.*).
4. On July 15, 2020, the Department processed a change in health benefits enrollment, indicating that the Respondent was eligible for a transfer of enrollment effective March 29, 2020, the first day of the pay period in which the Respondent was employed at the Department (OES Document 6, p. 25).
5. Beginning in pay period 15 of 2020, the Respondent's share of the health care premium was withheld in the amount of \$178.61 (OES Document 6, p. 12). In that same pay period,

⁹ As explained in the Findings of Fact and Analysis in this decision, the assertion seems to misstate the facts. The \$4,032.96 is the Government's share of the FEHB for the Respondent for pay periods 8 through 15 of 2020.

the Government paid \$4,032.96 for the Government's share of the Respondent's health care premium for pay periods 8 through 15 of 2020 (*Id.*). In the same pay period, the payroll agent reported an adjustment in Health Benefits in the amount of \$1,250.27 and reflects the amount the Government paid for the Respondent's share of her FEHB for pay periods 8 through 14 of 2020.

6. The payroll agent for the Department, U.S. Department of Interior, issued a Notice of Debt (Notice) dated July 27, 2020, for Debt ID 20101792225, in the amount of \$1,250.27. The debt was for the Respondent's share of her health benefit for pay periods 08 of 2020 through 14 of 2020, that was paid by the Department upon discovery of its error in not continuing the Respondent's health benefit (OES Document 3).
7. The Notice provided the Respondent with her appeal rights and provided debt collection information (OES Document 3, pp. 3-4).
8. The Respondent was also provided a payment agreement form (OES Document 3, p. 5).
9. The Respondent timely filed an appeal of this overpayment on August 19, 2020 (OES Document 1).

VI. Analysis

Health insurance is a benefit available to certain employees of the Federal Government (*See*, 5 U.S.C. Chapter 89 and specifically 5 U.S.C. § 8901(6)). The cost of health insurance is shared between the employing agency and the employee who enrolls in a health benefit plan (5 U.S.C. § 8906). The Office of Personnel Management was charged with establishing regulations related to the provision of Federal Employee Health Benefits (5 U.S.C. § 8913).

Pursuant to the regulations, an eligible employee may elect to enroll in a health benefit plan within 60 days of becoming eligible for this benefit and an employee may continue enrollment without change in plans when an employee moves from one employing office to another, provided there is no break in service greater than 3 days (5 C.F.R. §§ 890.301 and 890.303). The amount of the Government contribution is born by the employing agency pursuant to Section 8906 of Title 5 of the United States Code, plus 4% of that amount (5 C.F.R. § 890.501(a)). An employees enrolled in a health benefit plan is responsible for paying the enrollee share of the cost of enrollment for every pay period during which the employee is enrolled (5 C.F.R. § 890.502(a)(1)). If for any reason, the amount of the employee share is not properly withheld for each pay period during which the employee is enrolled, then the employee incurs a debt in the amount of the required withholding that is payable to the United States Government (*Id.*).

The Department's arguments are persuasive as they rely on the applicable regulations and the facts support the Department's assertion of an overpayment in the amount of \$1,250.27. The evidence does show the Respondent was an employee of the Federal Government, since her service computation date of July 6, 2010, and transferred to a position as a Management and Program Analyst in Federal Student Aid at the Department on March 29, 2020. Although eligible for FEHB on her transfer date, due to an error by the Department, she was not continuously enrolled for FEHB. As such the Department did not withhold the employee's share of the health insurance benefit premium and the Department did not pay its share of the health insurance benefit premium in pay periods 8 through 14 of 2020.

When the error was discovered in July 2020, the Respondent was informally notified of the error by a HR Specialist in FSA. The HR Specialist confirmed the correct health insurance benefit that should have been continued upon her transfer to the Department and processed a Notice of Change in Health Benefits Enrollment, effective March 29, 2020. In pay period 15 of 2020, the Department began withholding the employee's biweekly share of the health insurance benefit premium and paid its full share of the Department's contribution for the employee's health insurance benefit premium for pay periods 8 through 15 of 2020. Also in pay period 15, the Department recorded an adjustment to Health Benefits in the amount of \$1,250.27. This amount is equal to the Respondent's share of the health benefit premium for pay periods 08 through 14 of 2020. The adjustment represents a payment by the Department for the health benefit premium but was not deducted from the Respondent's gross pay in this pay period. This entry reflects the debt the Department incurred when it paid the Respondent's share of her health benefit premium for pay periods 8 through 14 of 2020. Because the Department remitted the full cost of the health insurance benefit, there was no interruption of health care coverage for the Respondent and other eligible enrollee.

The Respondent's request that the U.S. Government reconsider seeking repayment of this debt is contrary to the applicable statutes and regulations. Although the Respondent was no way at fault in causing the error, fault is not a factor in determining the validity of asserted debt. While it is unfortunate that onboarding errors at the Department consistently occur, the failure to address proper management of the employees in those personnel positions cannot be considered a factor in determining the validity of an asserted debt. Furthermore, Department employees receive consistent reminders that the employee is responsible for verification of pay, deductions, and leave, as was indicated in the remarks of each Earnings and Leave Statements for pay periods 8 through 19 of 2020 (OES Document 6, pp. 8-19).

As indicated earlier in this decision, the Respondent has not filed a response to the Department's brief and has not asserted extreme financial hardship to limit involuntary collection of this debt in the absence of a repayment agreement. Therefore, there is no evidence or argument to establish extreme financial hardship in this appeal.

VII. Conclusion and Order

For the reasons indicated in this decision, the asserted debt is a valid debt that requires repayment by the Respondent. Based on the foregoing findings of fact and analysis, it is **HEREBY ORDERED:**

1. The Respondent shall pay to the U.S. Department of Education, in a manner as required by law, the sum of \$1,250.27;
2. The Respondent shall have fifteen (15) days from receipt of this decision to complete and submit a Payment Agreement Form consistent with the instructions in the July 27, 2020 debt letter.¹⁰ The signed form shall be submitted to the to the designated Payroll Operations Division, indicating a voluntary onetime payment agreement (by check or

¹⁰ For the convenience of the Respondent, a copy of the Notice of Debt that includes the Agency's Payment Agreement form is attached to this decision.

money order) or authorizing biweekly payroll deduction in a specific dollar amount which is less than, equal to, or greater than 15% of disposable income, and which will be deducted until the debt is fully paid;

3. If the Respondent fails to timely submit a signed voluntary payment agreement pursuant to this decision, which is acceptable to the Department, the Department is authorized to collect through payroll deduction, or other lawful means an amount equal to 15% of disposable income, until the debt is fully paid;
4. This decision constitutes a final agency decision.

Dated: March 10, 2023

Angela J. Miranda
Administrative Law Judge

