

### CRS FASP Q&A's (Updated 6/30/21)

Q1: In 2014, the Digital Accountability and Transparency Act amended the DCIA to require agencies to notify Fiscal Service of all debts for purposes of administrative offset by 121 days delinquent. To clarify, does CRS focus on debt 121 days outstanding or less? Does debt outstanding >120 days get transmitted to DMS via the Cross-Servicing program?

A1: Yes, CRS focuses its efforts to collect the debt through initial invoicing and very early delinquency. Once the debt is delinquent for over 121 days, CRS is generally required to refer the debt to the Cross-Servicing program. Often, CRS refers the debt to the Cross-Servicing program at an earlier stage of delinquency, sometimes as soon as 61 days delinquency. The Cross-Servicing program generally will, in turn, refer the debt to the Treasury Offset Program.

#### Q2: How is the current debt data transmitted from the agency to the FA?

A2: The agency performs either a batch (using Connect:Direct or SFTP) or manual data entry of accounts receivable data.

### Q3: What is the total current outstanding non-delinquent, non-tax, non-loan agency debt in the CRS program?

A3: As of 6/2/21, CRS had 82,424 open cases. Of these open cases, the total current number of cases that are within the 30-day grace period (i.e., 1-30 days delinquent) were 66,372. Debt value is not available for these cases, but in FY20, 58% of CRS collections were pre-delinquent.

#### Q4: What percentage of the \$339 million invoiced in FY20 was collected?

A4: CRS collected 18% of the \$339 million invoiced in FY20.

#### Q5: What is the total sum of debt collected through CRS since its inception?

A5: From FY13 – FY20, \$274,531,582 has been collected through CRS.

#### Q6: How many FTE's are in place to operate CRS currently?

A6: Fiscal Service supports its CRS program with approximately 33 FTEs from its current financial agent and approximately 6 FTEs that are Fiscal Service employees, though these numbers fluctuate based on time/effort needed for enhancement work and other Fiscal Service priorities. Note, these FTE figures to not include employees who provide indirect support including back office functions.

#### Q7: Can you provide a list of agencies currently using CRS?

A7: Department of Defense, Peace Corps, Department of Agriculture, Department of Commerce, Department of Justice, Department of Labor, Pension Benefit Guaranty Corporation, Department of Treasury, Federal Communications Commission, Department of Veterans Affairs, National Endowment for the Humanities, National Science Foundation, Department of Homeland Security, Selective Service System, Department of Education, Consumer Financial Protection Bureau

### Q8: Which 3 agencies have the largest sums of non-delinquent debt outstanding being serviced by CRS?

A8: In FY20, the 3 agencies that had the largest sums of debt in CRS were Department of Defense, Department of Education, Department of Labor.

#### Q9: What percentage of outstanding debt does CRS collect?

A9: In FY20, the total percent collected was 18%, FY19 was 39%, FY18 was 28%, FY17 was 31%, FY16 was 40%, FY15 was 28%, FY14 was 66%, FY13 was 77%. The total average percent of outstanding debt collected from FY13 – FY20 is 28.77%.

#### Q10: What is the average length of time to collect debt in CRS?

A10: In FY19, 71.8% of all cases in CRS were paid and closed; in FY20, 62.1%; in FY21 to date 65.7%. Cases outstanding 121+ days are transmitted to the Cross-Servicing program, except to the extent the debtor has entered into a payment agreement or if a dispute is pending with the referring agency. Additionally, as of 6/2/21, of the 82,424 open cases, 81% are 0-30 days, 6% are 31-60 days, 4% are 61-90 days and 9% are 90-120 days.

#### Q11: What is the average number of invoices mailed by CRS per month?

A11: In FY20, CRS mailed an average of 68,150 invoices per month.

#### Q12: What percentage of debt is collected via invoice vs. telephone calls?

A12: Over the past 2+ fiscal years, approximately 10% of the payments and 25% of the dollars collected have been taken by CRS agents over the phone. The average payment amount collected over the phone is \$874; the average non-call payment is \$305.

#### Q13: What is the average number of inbound/outbound telephone calls?

A13: In FY20, the average number of monthly inbound calls was 3,568 and the average number of monthly outbound calls was approximately 15,925. In FY19, the average number of monthly inbound calls was 4,100 and the average number of monthly outbound calls was approximately 17,604.

### Q14: For the Historical Payment Channels it shows 13% are manual. What constitutes a manual payment?

A14: A manual payment is a payment processed through a non-CRS established collection channel. When the Agency records the payment in CRS, it is listed as 'manual' meaning it was not uploaded to CRS through the CIR extract.

### Q15: Does CRS operate a lockbox(s) at this time to support taking payments? I am assuming not all payments made to a lockbox are through the GLN at this time.

A15: CRS does not accept payments and does not operate a lockbox; however, our customer agencies may be approved to establish a lockbox to be used as one of their CRS collection channels.

# Q16: For the invoice generation, does Pay.gov generate all invoices electronically and provide these to CRS for print mail? In the CRS Receivable Life Cycle, it says CRS generates and mails an invoice with due process. So, does CRS generate the invoice from what Pay.gov provides or what is uploaded from the agency on a template created by CRS?

A16: CRS creates a billing number in Pay.gov to be printed on the invoice. CRS then generates and mails the invoice and uploads that invoice as an attachment to the Pay.gov eBill. When the debtor accesses the eBill in Pay.gov, the same letter/invoice that was mailed is attached to it.

### Q17: Does each agency have the letter customized with logos/color, and if so, are there volume by logo numbers available?

A17: The letters are standardized; however, the logo is selected by agency/bureau. There are no "volume by logo" numbers available.

#### Q18: Are any of the documents duplexed?

A18: The demand letter is duplexed.

#### Q19: Does the print for letters/remittance come from the current FA custom system or CRS?

A19: The printing and mailing is handled by the current FA.

#### Q20: Is there a specific schedule for mailing within the month?

A20: No, letters must be mailed by the next business day after entry into CRS.

#### Q21: Are print/mail jobs done once a month or continuously?

A21: Print/mail jobs are done continuously.

#### Q22: Is tracking of the printed/mailed letters required?

A22: Yes.

#### Q23: What is the address for return mail?

Lead. Transform. Deliver.

A23: The return address is that of the current FA.

### Q24: If CRS print/mails approximately 60,000 invoices per month, does each consumer just get one print/mail letter or do they get a mailing each month?

A24: Each debtor receives one demand letter when the case is established in CRS followed by one additional past due/due process notice 31 days later. CRS does not send monthly mailings for a debt.

### Q25: Is the remittance document a 2<sup>nd</sup> printed piece of paper in addition to the letter or is it a perforated coupon attached to the letter?

A25: The remittance document is a coupon attached to the letter for agencies who have elected to receive checks and money orders as payment.

### Q26: What type of automated capture print is on the remittance document i.e. OCR Font, Bar Code, QR Code or other?

A26: Debtors are provided with a QR code on the Payment Options page of their letter to access their Pay.gov eBill. There is no OCR Font or bar code on the remittance document.

### Q27: Is a return envelope included with letter and remittance document that the consumer can remit payment back to the GLN?

A27: CRS does not provide a return envelope.

### Q28: Upon request, can we get a copy/example of a letter and remittance documents and notices that would be mailed?

A28: Available upon request (and this documentation is covered by the NDA).

### Q29: Do all of the current CRS agencies utilize the outbound calling services at day 31? What is the case volume of the agencies that do not utilize outbound calling services?

A29: All but one CRS programs use the outbound calling service; our largest volume agency (~64,000 invoices per month) does not utilize outbound calling. For this agency, CRS only handles invoicing and inbound phone calls during the first 30 days after the invoice is sent.

#### Q30: What is the average # of cases that are in the collection queues on a daily basis?

A30: The average number of cases in collection queues on a daily basis is ~2,500.

Q31: You mentioned creating different strategies based on debt characteristics, but it was said during the session that you can't treat one debt different than the other. What kinds of debt characteristics are you looking to segment by?

A31: There are legal rights and protections that apply equally to all debtors and, in that sense, debtors may not be treated differently. Compliance with applicable law is CRS's primary goal.

However, Fiscal Service must also be fiscally responsible in its pursuit of collecting debts. In some cases, creating different segmentation strategies will better enable Fiscal Service to increase debt recovery while also minimizing collection costs. For example, we don't want to spend over \$100 to collect a \$100 debt.

Segmentation strategies for both proper cost alignment and increased likelihood of payment should be created from an analysis of all the different, available debt characteristics. Fiscal Service is looking for responding FIs, based on industry experience, to lead us through this process.

Further, debt collection laws and protections change frequently. Fiscal Service is seeking a flexible solution, with the ability to apply compliance rules at a configuration level (i.e., a software release is not required).

### Q32: The FAQ mentions the % of invoiced dollars collected. What is the % of cases that are collected on?

A32: For FY19, 71.8% of all cases in CRS were paid and closed; in FY20, 62.1%; in FY21 to date 65.7%.

### Q33: Are there any variations in the average balance and payment amount between the different agencies?

A33: Yes. During FY20, one agency had an average balance of \$52, while another agency had an average balance of \$400,000. Also, during FY20, the agency with the lowest average payment had an average payment size of \$49, while the agency with the highest average payment had an average payment size of \$60,341. Balances and payments can range anywhere from just a few dollars to several million dollars. For example, CRS could be dealing with a \$50 civil medical bill from an individual, or a \$1,000,000 institutional bill from a university. The types of cases CRS handles are diverse, which creates this variation.

### Q34: Besides invoicing and outbound collections, what other administrative services would the FA be responsible for?

A34: In addition to invoicing and outbound collections, the CRS FA has dedicated teams that handle a variety of services, including: interfacing with partner agencies, tracking outstanding agency issues, assisting agencies with questions, leading agency onboarding, drafting project change requests for system enhancements, planning system releases, leading weekly meetings with Fiscal Services partners, handling of inbound/outbound mail (and return mail), processing

administrative requests on cases, reviewing the physical documentation required to establish repayment plans, and the setup and monitoring of repayment plans.

### Q35: Since these debts are not technically "delinquent" is Fiscal Service looking for the FA to handle outbound collections more carefully than they would delinquent debts?

Q35: While CRS manages receivables when they become due, they are still governed by the DCIA and FCCS, so its debt collection practices and policies are consistent with its partners in Cross-Servicing. In general, debts are due the same date as the invoice, meaning that they are already delinquent by the time the debtor receives the invoice. By law, debtors generally have a 30-day grace period from the date of the invoice to pay the debt without incurring any interest or other charges or being subjected to involuntary debt collection action. Fiscal Service endeavors to collect all debts carefully and with respect for the debtor's situation, regardless of whether or how delinquent the debt might be.

### Q36: Can CRS cases be comingled with the FA's other outbound collection work, or must they be separated and worked by a dedicated CRS staff with government clearance?

A36: No, CRS debts cannot be comingled with the FA's other work in any way. Additionally, the FA staff that handles CRS calls must pass a government clearance and are expected to be 100% dedicated to CRS.

## Q37: It was mentioned in the session that the CRS FA is responsible for manually matching up payments that are not systemically matched. What is the monthly volume of payments that require manual intervention?

A37: Currently, the CRS Operations team attempts to correctly match approximately 700 unposted and/or misdirected with a CRS invoice.

### Q38: Approximately how many invoices are sent back each month as returned mail, and what is the FA required to do to process returned mail?

A38: The CRS Servicing team processes ~13,500 pieces of returned mail per month.

Approximately 1, 000 pieces are required to be scanned (including the return mail envelope), indexed, uploaded to the case in the CRS system, retained for 90 days and then destroyed.

The remaining 12,500 pieces correspond to a program that does not use the full suite of CRS services. These pieces are not required to be scanned, but notes are added to each case to indicate that returned mail was received and it is then boxed up and sent to the program.

### Q39: How many communications are received from customer agencies and system users on a monthly basis?

A39: On average, the CRS Agency Relations team handles over 2,000 communications with agency and system users per month.

#### Q40: What is the average timeline to onboard a new agency?

A40: Approximately 3-4 months for a web portal implementation; approximately 6 months for a batch implementation.

#### Q41: What is the meeting cadence for a typical onboarding schedule?

A41: CRS typically meets with the agency weekly to bi-weekly for a month or two to establish requirements, and do preliminary work; meetings then transition to weekly to finalize collection channel setups, obtain approvals, review the status of outstanding action items, and coordinate all remaining activities required for onboarding.

### Q42: What are some of the issues that typically arise when onboarding a new agency?

A42: Agencies may lack resources to support implementation, causing significant delays. This may include project management resources, development resources (for batch implementations), or simply not having the appropriate agency points of contact available to make progress. Decision-making often requires several layers of reviews and approvals at different levels within the Program, Bureau and Agency, which prolongs the onboarding process. Changing leadership at agencies shifts priorities and can cause delays or disengagement. After all onboarding tasks are completed, first case entry is sometimes delayed due to various issues within the agency (legal approvals, internal agency reassignments, etc.).

### Q43: Are there significant variations in the collectability of invoices from one agency to another?

A43: Yes. Of the "core" agencies that regularly transmit invoices to CRS (>500 invoices per year), the agency with the lowest percentage of collected cases had only 15.1% of its cases paid and closed during FY20. The agency with the highest percentage of collected cases had 93.4% of its cases paid and closed during FY20.

# Q44: For ADA Website accessibility compliance, our understanding is that there 3 levels (A, AA, AAAA) of ADA Compliance with varying complexities. Specific to CRS, is there a certain level that must be adhered to? Or, can you provide a minimal level of guidance to assure compliance to answer this question confidently?

A44: Fiscal Service requires that its FA comply with all relevant law, including the Americans with Disabilities Act. Fiscal Service notes that compliance with at least Level AA is generally required. Additional guidance can be found at <u>https://section508.gov/content/mapping-wcag-to-fpc</u>.

### Q45: In A17 you indicated that the letters are standardized, does this mean that each letter will be the same number of pages with the last page being the payment coupon?

A45: There is not a standard number of pages mailed to the debtor, however there is standard verbiage contained in every demand/due process letter. Each mailing consists of the "standard" demand, due process, or demand with due process notice, and a page outlining the various options for the debtor to make payment. The mailing may also include one or more pages of supporting documentation for the receivable.

#### Q46: What is the size of the current outgoing envelopes?

A46: Currently, the demand letter envelopes are 4  $1/8" \times 9 \%"$  and envelopes used to send Installment Agreement documents are 9"  $\times 12"$ .

### Q47: In the sample letter there is a printed "cut here" line for the coupon, is that line actually a perf line with cuts in the paper?

A47: The line for the coupon is not perforated.

#### Q48: What information is in the QR code at the top of the sample letter?

A48: The QR code at the top of the letter is for return mail processing. The QR Code is on the lower right corner of the Return Address area for all CRS generated letters so returned mail envelopes can be scanned without manually opening and scanning the letter. The QR Code is positioned to be visible in the envelope window and includes the Invoice Number from the letter.

#### Q49: What is the format of the file that goes to print i.e. PDF, Postscript, structured data?

A49: The letters that are sent to print are in PDF format. These letters are also are displayed in the User Interface and are attached to the debtor's eBill in Pay.gov.

### Q50: Does the CRS send one file to print each day from all of the records input for the day? If so, what time of day does that happen?

A50: Currently, the print job is executed once per business day early in the morning to ensure that documents are in the mail that business day. Documents printed and mailed are from the previous night's batch process. Documents must be mailed the business day following entry into CRS.

#### Q51: Is any portion of the letter printed in color or is it 100% black & white?

A51: The letter is printed in black & white.

### Q52: Does the CRS Servicer send an email the letter at the same time it prints and mails the paper? If so, is the consumer email embedded in data of the print file?

A52: An email is sent from Pay.gov to the debtor only if the debtor's email address is included with the case at creation. There is no embedded email in the print file.

#### Q53: Could you provide any information on the current standards utilized around the intake and transmit receivables data to and from customer agencies and Fiscal Service systems using secure file transfer methods designed by Fiscal Service?

A53: There are no secure file transfer methods designed by Fiscal Service; Fiscal service uses Connect:Direct and Secure File Transfer Protocol (SFTP), which offers built-in AES-265 encryption.

## Q54: Could you provide any specific detail around what is needed, or provide a current example of the customizable workflows and receivable settings such as balance calculations, timers, and status changes needed based on agency requirements?

A54: The CRS workflow is standard, with minor customization available – On "Day O" a case is entered into CRS via batch transmission or manual data entry; "Day 1" is the next business day, and is when the demand/demand with due process notices are mailed; "Day 2-30" passive collections begin during which time the debtor may pay, dispute the debt, request proof of debt, or enter into an installment agreement; "Day 31" due process notification or past due notice is mailed to the debtor; From "Day 32 - Due Process Duration" active collections begin and interest is assessed if applicable (customizable); "End of Due Process Duration" is when penalty is assessed if applicable and the debt is transferred to Treasury's Cross-servicing program for delinquent debt collection (customizable).

### Q55: Would you be able to provide an example of the receivables currently being generated that have the ability to itemize and/or invoice multiple co-debtors?

A55: Currently, the CRS system has the capability of permitting joint-and-several liability (multiple debtors fully responsible for the repayment of a debt) and itemization capability; however, that functionality is utilized based on an agency's requirements.

## Q56: Would you be able to provide specific information, or an example of how the following process is done today; calculate and apply interest, penalties, costs, and other charges to receivables in accordance with customer agency profile requirements?

A56: Payments made by a debtor towards a delinquent debt are applied to the outstanding balance of the debt in the following order: 1. penalty; 2. interest; 3. principal. CRS does not charge administrative costs. Interest and penalty accrue from the Day 1 (see Q54). Interest is generally assessed 30 days after the delinquency date. Interest rate defaults to the Department

of the Treasury's Current Value of Funds Rate. Penalty is charged at 6% and is assessed 90 days after the delinquency date. Agencies may customize the payment due date and due process duration, as well as the interest and penalty rates, based on statutory/regulatory requirements.