PENSION RIGHTS CENTER

Unfair Pension Takebacks:
What Can Be Done to Protect Retirees

A Working Paper by
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Pension Rights Center

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In 2001, Ralph Yore took early retirement from the aerospace company where he had been a maintenance inspector for 17 years. He began receiving $2937.97 per month in pension benefits. Then, in 2009, the pension plan informed him that, for eight years, he had been overpaid by $1261 per month. His correct benefit should have been $1676.93 per month. The plan notified the 73-year-old that, not only would his benefit be lowered to the correct amount, but an additional $709.40 per month would be deducted from his corrected monthly pension to recoup the overpayment. Therefore, Yore's monthly pension is now $967.53.

In one month's time, his pension income was reduced by two-thirds. His request for a waiver on grounds of financial hardship was denied. He is making minimum payments on his credit cards, refiguring his bills, and feeling stressed, which is not good for his blood pressure. He is now in the hole about $100 a month.

What happened to Ralph Yore is called "recoupment.[1] His pension plan made an error with his pension amount, he thought the amount was correct, and spent the money. Now his pension plan is taking back the overpayments. Ralph Yore's situation is all too common.

What Is Recoupment?

Recoupment occurs when a pension plan administrator erroneously overpays pension benefits to retirees. Often these overpayments are made for many years before anyone realizes that a mistake has been made. When a plan finally realizes it has made a mistake, it corrects future payments and recoups the overpaid amounts either by reducing future payments or demanding a lump sum.

These reductions are typically done with little or no warning to retirees and with no formal process for challenging the plan's action. A recoupment action can happen within one month's time. In extreme cases benefits are reduced to zero until the full overpaid amount has been recovered -- some plans also collect interest on the overpaid amounts. Plans justify recoupment actions by claiming that the plan has a fiduciary duty to collect overpayments on behalf of all other participants of the plan. The idea is that overpaid amounts are plan assets that belong to participants of the plan.

Currently, pension plans write their own rules on how they go about collecting money they negligently paid out. Typical recoupment schemes place the entire burden of repayment on retirees even when plan negligence causes the overpayment error and the overpaid amount is negligible when compared to the loss of income amount for the retiree.

Why/When Does Overpayment of Benefits Occur?

Common situations in which overpayment occurs with:

(1) Miscalculation or plan error: The plan or third-party administrator inaccurately calculates a participant's benefits or otherwise misapplies the provisions of the plan, resulting in too high a benefit being paid to participant.

(2) Participant error: A retiree receiving benefits from a multiemployer plan returns to work in the industry, trade or craft, in the geographic area covered by the plan and the retiree's benefits should have been suspended under the terms of the plan, an overpayment results.

(3) Benefit offsets: A participant receives an income benefit from some other source, which should reduce (or be offset against) the benefits paid to the participant by the plan. Overpayments occur in this context when the plan fails to include the offset in the benefit calculation. Plan benefits may be offset against a variety of collateral benefit or income stream sources, including Social Security, worker's compensation, or disability benefits.

(4) Double-dipping/collateral source: Generally arising from health or insurance plan situations in which the beneficiary's retention of a duplicative benefit from a non-plan source results in double reimbursement for the participant. Secondary payment typically takes the form of lump-sum tort awards, making the original benefit paid by the plan an overpayment.

(5) Termination of an underfunded plan: When plans terminate without enough funds to pay participants all accrued benefits, the PBGC takes over administration of the plan. The PBGC insures benefits up to certain amounts, so participants who receive benefits above the guarantee limits may suffer a benefit reduction as a result of the termination. While the PBGC is in the process of taking over a plan -- a process that can take several years -- participants may be overpaid above the guarantee limit. The PBGC has protections in place to guard against drastic benefit reductions in their recoupment cases.

The Legal Basis for Recoupment

Recoupment of an overpayment is permissible

Generally, a tax-qualified plan must provide that benefits provided under the plan may not be anticipated, assigned (either at law or in equity), alienated, or subject to attachment, garnishment, levy, execution, or other legal or equitable process.[2] Therefore, an arrangement for a plan to garnish/levy/assign a portion of a participant's normal monthly pension payment to "recoup" past overpayments, without a stated exception, would normally violate the "anti-alienation and anti-assignment" rule.

However, Treasury Regulation § 1.401(a)-13 identifies a few arrangements that it does not consider an assignment or alienation under IRC § 401(a)(13). One such exception is for recoupment arrangements – "any arrangement for the recovery by the plan of overpayments of benefits previously made to a participant."[3] In other words, recoupment is not an illegal alienation of benefits.[4]

Why plans recoup benefits

Typically, plan trustees read ERISA § 404(a)(1)(B) as requiring them to recoup any overpaid amounts. They view the requirement that they act solely in the interests of participants "with the care, skill, prudence and diligence under the circumstances prevailing…" as obligating them to recover erroneous payments. From their perspective, a fiduciary has the obligation to preserve and protect assets of a pension trust for all plan participants and so the overpayment of pension assets to any one individual is viewed as harming all other participants. Therefore, despite the fact that the mistake was through their negligence, fiduciaries argue they have a duty to recover erroneous overpayments on behalf of, and for the benefit of, all participants.

The Labor Department permits a fiduciary to recover prior overpayments through suspensions of, or offsets against, future payments but only when such recovery does not violate his/her fiduciary standards. With recoupment actions, ERISA fiduciary standards require that the fiduciary prudently weighs the plan's financial interest against individual circumstances, including the financial hardship to the participant.[5]

Plans may waive recoupment

Department of Labor Advisory Opinion 77-08 specifically authorizes a plan administrator or trustee to consider the hardship of a participant when deciding whether or not to recoup an overpayment. A fiduciary could be limited in its duties to recoup overpayments from a participant if "the facts and circumstances involved," include hardship to the participant or high plan costs that make it imprudent to seek recoupment.[6]

The DOL's guidance to consider hardship on the participant when deciding to bring a recoupment action is not widely known. Additionally, Advisory Opinion 77-08's hardship element is subjective as it does not define the type or level of hardship the participant must demonstrate before a plan may waive a recoupment action.

Equitable Estoppel fails as a remedy

Generally, most equitable estoppel defenses by retirees hoping to prevent a recoupment action fail in court.[7] Although a few retirees have been able to successfully claim equitable estoppel when courts have found "extraordinary circumstances," these situations are very fact-specific and apply in only rare situations.[8] Generally, equitable estoppel arguments alone cannot overcome a fiduciary's duty to maintain the actuarial soundness of a pension plan on behalf of all other participants. An overpayment by a plan to a retiree is seen as an "advance payment" of the retirees' pension money. This rationale helps justify a plan's recoupment action that is generally based on the fiduciary's obligation, on behalf of all other participants, to maintain the plan's actuarial soundness.[9]

<u>Proposed Legislative Reform</u>

The Restoring Pension Promises to Workers Act of 2007 (S.1725, 110th Congress), introduced by Senator Tom Harkin, proposed limitations on a pension plan's ability to collect money from pension recipients for overpayments. The bill would have prohibited recoupment actions in situations where it would cause a financial hardship to the retiree or where the amount sought would be insignificant relative to the plan's overall funding ratio. The bill also imposed a three year statute of limitations for plans to bring recoupment actions. Under this statute, plans would only be able to reach back three years from when it discovers an overpayment. Finally, the bill would have required plans to notify retirees and any eligible beneficiaries of the right to appeal a plan's decision to enforce a recoupment action. The bill has not been reintroduced but it was a promising start in the effort to address the overpayment and recoupment issue.

Regulatory Reform Options

Modify and publicize the DOL Advisory Opinion 77-08's participant hardship principle

The Department of Labor could protect many retirees from unfair recoupment actions by modifying the content of Advisory Opinion 77-08 and publishing the revised guidance in the form of a regulation or field advisory bulletin. New guidance could reemphasize the principles of Advisory Opinion 77-08 by highlighting the fact that waiving recoupment of an overpayment is not a breach of fiduciary duty and, when considering any recoupment action, financial hardship of the participant should considered. This guidance should detail the types and levels of hardship that, if demonstrated, would preclude recoupment.

Limit the monthly amount that can be recouped

Once an overpayment has been detected plans should reduce a retiree's benefits to the correct amount. But plans then should be limited by a capped percentage in further reducing retirees' benefits for the purposes of recoupment. Since a retiree's monthly benefit payment will have already been reduced prospectively as a result of recalculating the benefit to the correct amount, it is unreasonable to allow plans to further lower the benefit without any limitations or notice. Retirees often depend on their monthly pension payments as a sole source of retirement income. Reducing such a payment twice, without any notice and without any limitation, can be detrimental to a retiree. These actions are especially unreasonable when the overpayments occurred for many years because of a plan's negligence.

Limiting the amount a plan can recoup is not unprecedented. For example, **DOL Reg. § 2530.203-3** specifically authorizes a plan to recoup early retirement benefits paid out to multiemployer plan retirees that should have been suspended upon participant's re-employment in the same craft, trade, or geographic area. However, such recoupment is limited to a maximum of 25 percent of any benefit moving forward and cannot reduce the actuarial value of participant's normal retirement benefit.

Similarly, the Pension Benefit Guaranty Corporation also has recoupment limits to avoid creating financial hardship to pensioners. ERISA § 4022.82(a)(2)(ii) limits the recoupment of overpayments due under Title IV to no more than the greater of 10 percent of the "overpayment percentage" or the amounts in excess of the maximum guaranteed benefit under ERISA § 4022(b)(3)(B).[10]

Require plans to give participants advance notice of recoupment and right to appeal

A plan's recoupment action is subject to a participant's appeal through the administrative claims and appeals process, but yet most plans do not notify participants of their right to appeal a recoupment action. Plans should be required notify participants and retirees of an adverse benefit determination and provide 90 days appeal period during which benefit payments could be reduced to the corrected amount, but not further reduced to collect any overpayments. Only after the 90-day period and a failed appeal should a plan be permitted to impose a recoupment action.[11]

Conclusion

The recoupment problem is a difficult situation for both plans and participants. Plans must balance their duty to an individual participant with the plans' duty to all participants. However, retirees should not be subject to unexpected and excessive financial burdens because of a plan's mistake. Retirees should receive the benefits they earned, no more or less, but the repayment process must be equitable. The competing interests at play in an overpayment situation demand accountability and reasonable accommodations on the part of everyone. Plans should be permitted to recoup overpayments, but appropriate limits on the amount of benefits a plan may recoup should be imposed along with a fiduciary's ability to waive overpayments in situations of financial hardship.

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[1] For the purposes of this paper, the term "recoupment" refers to the instance where a plan automatically arranges for a participant's pension payment to be reduced below its "corrected amount" to provide for reimbursement to the plan of overpaid amounts received by the participant.

[2] IRC § 401(a)(13); Treas. Reg. § 1.401(a)-13. Assignment and alienation defined as "(1) any arrangement providing for the payment to the employer of plan benefits which otherwise would be due the participant under the plan, and (2) any direct or indirect arrangement (whether revocable or irrevocable) whereby a party acquires from a participant or beneficiary a right or interest enforceable against the plan in, or to, all or any part of a plan benefit payment which is, or may become, payable to the participant or beneficiary".

[3] Treas. Reg. § 1.401(a)-13(c)(iii).

[4] Other "carve-outs" to the Anti-Alienation Rules: The following arrangements/conditions allow for the proceeds of a pension plan to be assigned to another individual or entity: Qualified Domestic Relations Order (QDRO); Personal Bankruptcy; Federal Tax liens and Crimes Against the Plan -- In addition to these carved-out arrangements, there are "exceptions" to the general rule -- the following exceptions: (1) Revocable 10% Assignment: Once a benefit is in pay status, a plan may permit a participant to make a voluntary, revocable assignment of up to 10% of each future benefit payment, (2) Security for Plan Loans: Non-forfeitable benefits may be used as security for plan loans to participants so long as such loans meet certain fairness and reasonableness requirements as set forth in ERISA § 408(b)(1) and are IRC § 4975(d)(1)(operating to exempt plan loans from ERISA's prohibited transaction rules).

[5] *See* DOL Adv. Ops. (AO) 77-07, 77-33, 77-34, 77-08 and unnumbered opinion dated April 4, 1977.

[6] *See* DOL Adv. Ops. (AO) 77-08.

[7] Generally, equitable estoppel arguments by the retiree fail because they fail to demonstrate an "extraordinary circumstance in which justifies the absence of recoupment of overpayments by a plan". The idea is that "The actuarial soundness of pension funds is, absent extraordinary circumstances, too important to permit trustees to obligate the fund to pay pensions to persons not entitled to them under the express terms of the pension plan." Philips v. Kennedy, 542 F.2d 52, at footnote 8.

[8] *See Bloemker v. Laborer's Local, 265 Pension Fund*, 605 F.3d 436 (6th Cir. 2010).

[9] *See* DOL Adv. Ops. (AO) 77-08.

[10] Generally, after termination of a plan occurs, the PBGC will take over as trustee and determine what benefits are due to participants under the PBGC's guaranteed limits. Between the plan's termination date and when the PBGC's final benefit determination is made, participants could receive overpayments. The PBGC recoups overpaid amounts over a certain period of time by reducing a participant's final benetit determination amount going forward. The amount a PBGC can recoup from each payment is limited by the "overpayment percentage." The "overpayment percentage" is determined by dividing the value of the total amount of the overpayments by the value of the correct payments. For Example: A person's finalized benefit is determined to be worth a lump sum value of $100,000, and their monthly benefit is finalized at $1,000. The person had been receiving $1300 for the 10 months between plan termination and final benefit determination. The overpayment percentage is three percent ($3,000 in overpayments divided by the lump sum value of the finalized benefit amount, $100,000 at termination date). The participant's

benefit will be reduced by $30 per month (three percent of the finalized monthly benefit amount, $1000) for 100 months.

[11] It would also be helpful if participants were notified of the availability of assistance through EBSA. EBSA field staff could, where appropriate, refer retirees to the National Pension Lawyers Network or an Administration on Aging pension counseling project.

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'Overpaid' Pensions Being Seized

By ELLEN E. SCHULTZ

Ralph Yore, a retired aircraft inspector, found out the hard way what happens when companies make pension errors.

Paying Back Pension Mistakes

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Mike Belleme for The Wall Street Journal

A photo of Harold Kenneth Phillips' mining crew, taken around 1995, hangs on the wall of his home in Clintwood, Va.

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Mike Belleme for The Wall Street Journal

Harold Kenneth Phillips, a retired coal miner, sued Brink's to recover the amount of overpaid pension funds it clawed back from him. He won.

Mr. Yore, 73 years old, received a letter earlier this year saying the pension he had been receiving in retirement was too large. The pension would be cut by two-thirds, to $967 a month, the letter said—and he had to repay $100,000.

His former employer—Vought Aircraft Industries Inc., now a division of Triumph Group Inc.—says retirees don't have a right to keep excess benefits paid to them erroneously, and that the pension plan is required to correct such mistakes.

The case of Mr. Yore underscores a trend where some companies, amid internal audits of their pension plans, are discovering they have mistakenly overpaid retirees and are taking action to recoup the funds.

"Retirees are often confused and shocked to learn that their pension plan overpaid them," says Justin Freeborn, a lawyer with the Western States Pension Assistance Project, a Sacramento, Calif., group that is partly funded by the U.S. Administration on Aging.

There aren't any statistics regarding pension overpayments, but senior advocates say they have seen a spike of "recoupment" cases, which are now one of the most common pension problems some advocacy groups are handling. Mr. Freeborn now spends almost one-third of his working time handling recoupment cases; a few years ago, the staff rarely saw such cases.

Federal law requires that overpayments be returned to the pension plan. But it doesn't specify who should do so. Companies almost always seek repayment from retirees or surviving spouses, usually by reducing the person's pension, or stopping it altogether, until the overpayment is recovered.

Of course, companies shouldn't be overpaying pensions. And former workers shouldn't be receiving more than they are entitled to get.

But retiree advocates say it is unfair for retirees struggling with small pensions on fixed incomes to pay for a company's mistakes. "In most cases, they had no idea they were receiving the wrong amount," Mr. Freeborn says.

"They've already spent the overpaid money, and they have no way to pay it back."

In early 2009, Sylvia Glaab, a 71-year-old retiree in Aliso Viejo, Calif., tried to roll her "Cash Account Plan"—a type of pension that can be cashed out, like a 401(k)—at Macy's Inc. into an individual retirement account. Macy's didn't release her money. Instead, it sent her a letter in March 2009 saying it had just discovered it had overpaid the separate pension she had been receiving since she retired in 1994 after 24 years as a Macy's manager.

The pension should have been $181 a month, not $360, the letter said. Unless Ms. Glaab sent a check to Macy's for the total overpayments of $32,973, the letter said, the company would keep the $19,828 in her Cash Account Plan—and deduct $110 a month from her $180 a month pension, leaving her with a monthly pension of $70 for life.

"We apologize for any inconvenience," the letter said.

Without legal help, it is difficult for retirees to challenge whether they have actually been overpaid, or to negotiate an affordable repayment plan.

Even after prodding by the Western States Pension Assistance Project, Macy's didn't release Ms. Glaab's retirement account until February 2010, at which point it dropped its demand for repayment.

A Macy's spokesman says an overpayment is a "very rare occurrence. But when an overpayment does come to our attention, we contact the participant and resolve the situation by reducing the benefit to the proper amount and/or working out a reasonable process to recover any overpayment. We are committed to paying out the full amount of pension that a participant is owed."

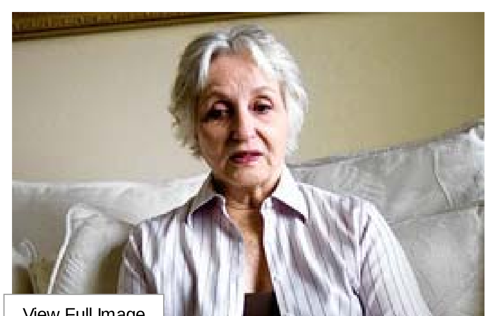
Federal pension law doesn't address the issue of fairness. But recoupments also fall under state trust laws, which consider whether the action is equitable. This determination can hinge on how much time has elapsed since the overpayment began, among other things.

It took Brink's Co. seven years to discover it was overpaying Harold Kenneth Phillips, a retired coal miner. Mr. Phillips had worked for the company, then known as Pittston Co., for 23 years until a coal cart he was riding in crashed, leaving him permanently disabled.

He began receiving his monthly pension of $1,751 in 1997, but in 2005 a new pension administrator recalculated the amount, and concluded that Mr. Phillips was being overpaid $341 a month.

Dozens of other retirees were being overpaid, too.

To recover the $26,000 overpayment, the pension administrator reduced Mr. Phillips's pension by $517 a month. With interest, Mr. Phillips, who now is 57, would have repaid $50,000 by age 81.



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Michal Czerwonka for The Wall Street Journal

Sylvia Glaab tried to roll her 'Cash Account Plan' at Macy's into an IRA. Macy's then discovered it had overpaid her and sought repayment.

Mr. Phillips sued, and a federal judge in Richmond, Va., ruled in July 2009 that because the company had taken so long to detect the overpayments, it would be unfair to require Mr. Phillips to repay the amounts. The judge ordered Brink's to return the amount it had recouped from 2005 to November 2009, plus interest.

Brink's declined to comment.

Federal law doesn't put a ceiling on the amount of an overpayment that a private pension plan can seek to recover. Multiemployer pension plans, which cover retirees at different companies, are limited to 25% reductions, while the Pension Benefit Guaranty Corp., which takes over failed plans, can reduce a pension by no more than 10%, and doesn't charge interest.

Most companies, however, reduce pensions by 25% or more of the newly reduced pension, so the impact can be significant.

Mr. Yore, the aircraft retiree in Westminster, Calif., who owes $100,000, had been getting $2,900 a month since he retired in 2001. This included an early-retirement incentive that was the equivalent of the Social Security he would receive at 65, of $1,300 a month.

His former employer, Vought Aircraft, forgot to end the supplement and reduce his pension to $1,676 when Mr. Yore turned 65 in 2002. To recover the overpayment, it is recouping $709 a month from the correct amount of $1,676—a 58% reduction, leaving Mr. Yore with a monthly pension of $967. That is 76% less than he has been receiving.

"I'm really in a bind," Mr. Yore says, "and may have to go back to work."

Write to Ellen E. Schultz at ellen.schultz@wsj.com

THE ORANGE COUNTY REGISTER

That pension? You might have to pay it back

By TERYL ZARNOW
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Ralph Yore made a career out of being careful.

After 12 years in the Marines, including a tour in Vietnam, he began his life's work in aircraft maintenance. He was a quality control inspector and supervisor with the Department of Defense in Vietnam, for Bell Helicopters in Iran and several airlines. Eventually, in 1984, he landed at Northrop Grumman in Hawthorne.

Yore, 73, spent 17 years at Northrop ensuring in essence that planes didn't fall apart during flight. Small things like that.

Now, in his retirement, another small thing has knocked him sideways.

When this husband and father of two took early retirement in 2001, he began receiving pension payments of $2,937.93 per month.

In April of 2009, he received a letter saying that an audit discovered a mistake: For the past eight years he had been paid $1,261 per month too much. His payments should have been reduced when he began collecting Social Security.

Yore's payments were corrected to $1,676.93 per month.

The letter came from Vought Aircraft that inherited his pension plan when it was split from Northrop. Vought is now part of the Triumph Group.

In March of 2010, Yore received a second letter: To recover the overpayment, the pension plan will deduct $709.40 per month. His new monthly payment is suddenly $967.53.

Ouch.

Clearly, Yore shouldn't be overpaid – but pension plans shouldn't make mistakes. Issues of fairness and responsibility here are tangled – unless it happens to you. Then it seems obvious.

Yore just wants to live a comfortable life in Westminster taking care of his family, his house and his fruit trees.

Instead he's making minimum payments on his credit cards, refiguring his bills and feeling stressed – none of which can be good for his blood pressure. His current payment leaves Yore in the hole about $100 per month.

He's patriotic and proud of his military service; he doesn't want handouts.

"If I had known, I never would have taken the money."

But Yore wonders: Doesn't a company audit its books every year? Why is he penalized?

Bookkeepers made a seven-year mistake and now he is paying for it – all because they weren't very careful.

Yore doesn't want to spend the rest of his life paying back a debt he didn't know he had.

Legally, he might have to.

Turns out pensions paid by single employers fall into a murky area of federal law governed under Treasury and

Department of Labor regulations.

It is clear that, when administrators make a mistake, the plans are supposed to recoup the money, but nothing specifies from whom.

Common sense questions remain: Should there be a statute of limitations on mistakes? Should it matter if you can't afford repayments? Should plans really be allowed to charge interest?

The answers come case by case.

Justin Freeborn is an attorney with the Western States Pension Assistance Project, funded by the U.S. Administration of Aging, which provides free pension counseling. He says although court opinions conflict, he believes a major consideration should be whether an individual has an ability to repay.

"A lot of times our clients have no idea they are being overpaid. If you miscalculate $50 a month over 10 years, that really starts to add up."

Yore was overpaid $113,490. The plan has denied his claim to waive the repayment; now Freeborn is drafting an appeal. The last resort is court.

"Pension plans are legally responsible for calculating the benefits they pay," Freeborn notes. "Why should the individual participant have to pay for the errors caused by a pension plan?"

Pension plan rules are complex, and the appeals process is time-consuming, says Freeborn, who is helping Yore and spends about one-third of his time on similar cases.

Getting the plan documents and files for Yore's case and writing the appeal has consumed about 50 hours to date. He doesn't think typical retirees could do this themselves.

A basic question is: who bears responsibility?

Ultimately the retiree is not responsible to monitor his or her pension plan, says Rebecca Davis, legislative counsel for the Pension Rights Center. The plan's mistake is not the retiree's fault.

Ironically, if a bankrupt plan is taken over by the Pension Benefit Guarantee Corp., federal law protects retirees very well. Nearly always, benefits can be reduced by no more than 10% to recoup overpayments.

In single employer, private plans, Davis adds, there aren't a whole lot of rules to protect individuals.

There should be.

Sylvia Glaab from Aliso Viejo knew nothing of this when her letter came in 2009.

Glaab had two retirement plans. The first she earned from nearly 25 years working as a manager at Broadway that was sold to Macy's. The second was from nine subsequent years working at Macy's.

When she turned 71 in 2009, she wanted to roll her second plan over into an IRA and contacted the benefits folks for help.

Instead, her request triggered an audit and Macy's determined Glaab had been overpaid on her first plan since 1994. Meantime, the $19,000 she had built up in her second plan disappeared from her statements.

"That threw me into a panic," she recalls. "Finally someone said: 'You've been overpaid $179 per month. You owe us $32,000.'"

The form letter that followed said she could send a check or they would keep her second account and reduce Glaab's monthly payments. Her correct payment of $180 per month would be cut to $70 per month for life.

"I don't have $32,000 to write a check. I had received that amount for 15 years ... I have no idea where they were getting those numbers."

She contacted the Pension Assistance Project. In response to an appeal, Macy's released Glaab's $19,000 in 2010 and agreed to waive repayment.

Freeborn believes Macy's ultimately did the right thing, but wishes they had done it sooner.

"Would they have waived the overpayment and agreed to give her access to her account if we hadn't gotten involved? I highly doubt it."

Glaab, who receives Social Security, now receives an adjusted payment of $180. She continues to work part-time, and doesn't know when she will be able to stop.

In fact, she points out she has worked hard all her life – and these benefits are part of her compensation.

She wants other retirees to know:

"You don't have to just do whatever you are told to do in an impersonal form letter. There is recourse."

To get help

Contact the writer: Send story ideas to: terylzarnow@gmail.com.

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