

## JUSTIFICATION FOR RI 34-20

RI 34-20, *Notice of Debt Due Because of FEHB Premium Underpayment*, was created to address a criticism from the Merit Systems Protection Board due to the fact that the Office of Personnel Management was informing annuitants that they owe for health benefits premiums using RI 34-3, titled *Notice of Debt Due Because of Annuity Overpayment*.

RI 34-20 is identical to RI 34-3, except for the title and changes to correctly describe the debt.