



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

September 29, 2020

Attn: CouncilTeam@HHS.gov

Office of the Assistant Secretary for Planning and Evaluation (ASPE),
U.S. Department of Health and Human Services (HHS).

The Consortium for Citizens with Disabilities (CCD) Veterans Task Force offers the following comments to the Request for Information (RFI) seeking public input on the development of a federal interagency Council on Economic Mobility (Council). CCD is a coalition of national disability rights, advocates, consumer, and provider organizations representing the nation's 61 million people with disabilities. Our organizations strive daily to ensure that people with disabilities are able to participate fully in their communities and to enjoy the richness of life afforded to all people in the United States. The Veterans Task Force concerns itself with issues of importance to veterans with disabilities.

It is our understanding that the information from stakeholders will be used to inform the Council's priorities and how the Council can promote economic mobility, recovery, and resilience among the American populace. HHS is leading the development and establishment of this interagency Council on Economic Mobility (Council) which is composed of the heads of member agencies (HHS; the U.S. Departments of Agriculture, Education, Labor, Housing and Urban Development [HUD], and Treasury; the Social Security Administration [SSA]; and the Council of Economic Advisors [CEA]) or their delegates. HHS will also serve as the first Council chair.

The Council aims to promote economic recovery and build resilience in the face of the COVID-19 pandemic, learning from the response to build a more integrated and effective long-term federal strategy to promote economic mobility and help individuals sustain their economic success." In the RFI notice, HHS notes that many "federal workforce and work support programs and services are overseen by the Council member agencies, such as the Child Care and Development Fund, Medicaid, Supplemental Nutrition Assistance Program Employment and Training, the Family Self-Sufficiency program, the Jobs Plus program, Vocational Rehabilitation programs, and Workforce Innovation and Opportunity Act (WIOA) programs, among others."

We are concerned that the Department of Veterans Affairs (VA) was omitted from membership in the Council. Veterans with significant disabilities have been among those populations most adversely affected by the pandemic from direct health effects, to job losses to closures of many disabled veteran owned small businesses. Although they rely on the assortment of programs offered through the VA, many of these veterans also rely on programs operated by SSA, HHS, Education, Labor, and HUD. Since

1957, military service has been covered under Social Security and roughly 1 million veterans with service-connected disabilities also receive Social Security disability insurance (SSDI). Millions of other veterans with catastrophic non-service-connected disabilities rely solely on SSDI but receive medical services through the VA. Many of these veterans also use Medicare and/or Medicaid. Veterans with disabilities are served by numerous programs under the DoL and important metrics were included in the last authorization of WIOA to ensure that the workforce system was appropriately serving these veterans. Just last year, Congress authorized the DOL Veterans Employment and Training Service (VETS) to implement a Disabled Veterans Program to focus attention on employment challenges faced by these veterans.

It is also important to remember that many non-VA programs have eligibility criteria and policies that interact in particular ways with VA benefits that should be taken into consideration by this Council. For example, Supplemental Security Income (SSI) is not counted for purposes of the low-income VA Pension but VA Pension benefits are counted as income by SSI. Several HUD programs targeted to low income individuals with disabilities often exclude low income veterans because they fall just outside the income thresholds. Not only do the interactions of VA benefits program with other federal benefits programs affect the veterans themselves but also their family members.

We believe it is important for the Council to include in its consideration of cross-cutting issues those affecting veterans with disabilities by including the VA in its membership.

Questions about CCD or the Veterans Task Force may be directed to Susan Prokop, Paralyzed Veterans of America, susanp@pva.org or 202-416-7707.