



CONSORTIUM FOR CITIZENS  
WITH DISABILITIES

## **CCD Veterans Task Force Recommendations for the Administration**

Because veterans with disabilities are people with disabilities, the CCD Veterans Task Force seeks to draw particular attention to cross-cutting issues affecting this population as part of the broader community of those with disabilities in addition to highlighting issues directly affecting veterans with disabilities, both service-connected and non-service-connected. The task force urges the next administration to address these administrative and regulatory issues that have a significant impact on this population of veterans.

**Swiftly implement the DOL VETS Disabled Veterans Outreach Program** - In 2019, Congress created a Disabled Veterans Outreach Program within DOL VETS to focus on the particular challenges faced by veterans with significant disabilities in returning to the workforce. Unfortunately, the agency has been slow in filling this position. When fully activated, this program can leverage the resources of DOL to draw attention to employment barriers and opportunities for veterans with significant disabilities, facilitate coordination with other federal agencies affecting their employment and foster outreach to the private sector to enhance the focus on hiring and retention of these veterans. Given the impact of COVID-19 on labor force participation by veterans and other people with disabilities, it is vital that this program be fully implemented as soon as possible.

**Create measurable standards to ensure users of Internet Protocol Captioned Telephone Service (IP CTS) receive accurate and quality captions** - As a result of the FCC approving automatic speech recognition (ASR)-only technology for captioned telephone service, we need to mandate better standards to ensure accuracy and quality, which are now more crucial than ever as use of the service grows and more people with hearing loss are relying on it. We ask that the new administration commit to working with the veteran and disability community to make certain that the FCC implement rigorous testing procedures and quality metrics and standards for accuracy of ASR technology. Doing so will ensure that captioned telephone service is “functionally equivalent” to phone conversations for people with hearing loss, a fundamental communications right protected by the Americans with Disabilities Act. Further, it is key that captioned telephone users can engage in phone conversations without risk of miscommunication—which could potentially be dangerous—due to incorrect captions.

### **Preserve the Lifeline Program**

Lifeline is a federal program created in 1985 to help low-income consumers afford telephone service. The program now includes wireless service and broadband Internet, and helps low income veterans in every state and territory afford voice and broadband service. But the FCC may devastate the program by drastically reducing the number of eligible service providers and limiting the reach of Lifeline. The FCC’s proposals would increase costs and boot nearly 70% of Lifeline households from their current carrier. We are asking that the administration not make the changes proposed.

**Make improvements in Social Security Administration processing of Wounded Warrior/VAPT disability insurance claims** – Claims for SSDI by service members and veterans with catastrophic disabilities are supposed to receive expedited processing by the Social Security Administration. However, an SSA Inspector General report in July, 2019 found that the Social Security Administration had no consistent processes in place for handling SSDI claims of service-injured service members or veterans with 100% permanent and total disability ratings from the VA. According to the SSA OIG, at the initial claims level, SSA processed MC/WW and VAPT claims only 1 day faster than it processed all disability claims. Moreover, SSA could not provide evidence that it followed its policies and procedures to ensure staff and management properly tracked or monitored MC/WW and VAPT claims. The OIG recommended that SSA define what it means by “expeditious” for processing MC/WW and VAPT claims and measure processing time pursuant to the definition. The OIG also recommended that SSA implement controls to monitor, track, and measure the processing of MC/WW and VAPT claims. While SSA agreed with the OIG recommendations, the next administration should ensure that SSA has followed through.

### **Caregivers Program Expansion**

VA's Program of Comprehensive Assistance for Family Caregivers (PCAFC) expansion was implemented on October 1, 2020. This extended eligibility to pre-9/11 eligible veterans from WWII, Korea, and Vietnam to begin applying under the newly expanded program. The administration must assure that VA is consistent in implementing eligibility based on policy. Moreover, the VA should be held accountable for consistent eligibility decisions across the VA system and assure that current participants are not dropped from PCAFC based on new guidelines.