



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

May 1, 2014

The Honorable Carolyn Colvin
Acting Commissioner, Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235-6401

Dear Acting Commissioner Colvin:

The undersigned members of the Consortium for Citizens with Disabilities (CCD) are writing to express our concerns with the Social Security Administration (SSA) plan to phase out two field office services – benefit verification letters and Social Security Number printouts (“SSN printouts”). We support efforts to lower the demand for these documents by encouraging agencies that request this information to increase their use of electronic data exchanges and reduce any unnecessary use. However, we are deeply concerned that SSA’s plan places significant burden and risk of harm on the individuals who will continue to be required to provide proof of SSN or benefits. **We urge SSA to remove any firm phase-out deadline.**

CCD is a coalition of national organizations working together to advocate for national public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of the 57 million children and adults with disabilities in all aspects of society. Services provided by SSA at its field offices play a vital role in the lives of all Americans, including people with disabilities. Benefit verification letters and SSN printouts help people with disabilities document their SSN for a current or prospective employer, and enable individuals to access a wide range of private, federal, state, and local government services -- from drivers’ licenses to housing.

This winter, SSA announced that its field offices would no longer provide these services, except in cases of “dire need,” effective April 1, 2014. Subsequently, SSA has delayed implementation to the late summer and fall of 2014. SSA’s most recent communication stated that field offices will stop providing SSN printouts to the public effective August 1, 2014 and will stop providing benefit verification letters effective October 1, 2014.¹

These changes will impact millions of Americans. According to SSA, in 2012 field offices issued approximately 6 million SSN printouts and approximately 5 million benefit verification letters.

¹ “Social Security’s Field Office Service Change Exceptions”, Email communication February 6, 2014, Kojuan Almond, Associate Commissioner, for External Affairs.

Benefit verification letters serve as proof of income for a variety of purposes, such as securing loans and mortgages and other housing, and securing public benefits such as Temporary Assistance for Needy Families benefits (TANF), Supplemental Nutrition Assistance Program benefits (SNAP; formerly called Food Stamps), public housing, Medicaid, and many others. They are also used to establish Medicare coverage, age, and retirement or disability status.

SSN printouts have long served as an important means for establishing a SSN for individuals who have lost or otherwise do not have their original Social Security card. SSN printouts also serve as an important backup source of identification for individuals who have lost or otherwise do not have other proof of identity. According to the SSA Inspector General, SSN printouts are most commonly requested for use with state Departments of Motor Vehicles, employers, and state social service agencies.²

While benefit verification letters will continue to be provided via SSA's 1-800 number and online *my Social Security* accounts, these options will not serve as meaningful alternatives for many individuals. Prospective employers, state and local agencies, and other entities often require proof of income on an immediate basis – and requests made via the toll-free number take 5 to 7 days, too long to wait in many cases. Additionally, many individuals are unable to successfully register for *my Social Security*, and it is our understanding that online benefit verifications may overstate income for certain individuals as the online verifications may not reflect benefit offsets (such as for workers' compensation benefits). Furthermore, people with disabilities, seniors, and low-income individuals are much less likely to have access to a computer and/or to the Internet.³ As a result, *my Social Security* accounts may prove extremely difficult for many people with disabilities and others to use – or, to use in a manner that preserves individuals' privacy and personal information.

SSA has indicated that it expects federal, state, and local agencies and other entities to step up their use of data exchanges, reducing the number of individuals who are sent to SSA to obtain benefit verification letters to document their income or SSN printouts to establish their Social Security Number. While this is a positive direction that could reduce the burden on individuals who currently must visit field offices to obtain this information, we fear that it will take far longer than seven to nine months for agencies to establish operational data exchanges with SSA. This shift may also require significant procedural changes and staff retraining to alter decades of culture and practice at state and local agencies, which in many cases have for years placed the burden of providing this information on applicants for public services and benefits.

Finally, while SSA has indicated that field office managers may authorize the release of benefit verification letters “if the individual provides an explanation of an immediate dire need,”ⁱ the criteria for determining dire need and the process for appealing denials of a dire need request remain undefined. This undefined process has the potential to lead to additional hardship for beneficiaries – who may still wait for hours in a field office, only to be denied – and on field

² Office of the Inspector General, Social Security Administration (December, 2011). Controls for Issuing Social Security Number Printouts, Report A-04-11-11105.

³ See: Pew Research Center (2013). Who's not online and why.

<http://www.pewinternet.org/2013/09/25/whos-not-online-and-why/>.

Pew Research Center (2011). Americans living with disability and their technology profile.

<http://www.pewinternet.org/2011/01/21/americans-living-with-disability-and-their-technology-profile/>

office managers and staff who must determine dire need on a case-by-case basis and develop a process for appeals.

For the above reasons, the undersigned members of CCD are deeply concerned that SSA's plan places significant burden and risk of harm on the individuals who will continue to be required to provide proof of SSN or benefits – including adults and children with disabilities. We also fear that there is significant risk of eroding the public's confidence in our nation's Social Security system, and of placing new workloads and costs on SSA associated with determination and appeal of dire need exceptions and increased use of the 1-800 number and *my Social Security*.

We urge SSA to remove any firm deadline for phase-out of field office provision of SSN printouts and benefit verification letters.

If you have any questions please contact CCD Social Security Task Force Co-Chair T.J. Sutcliffe at sutcliffe@thearc.org.

Sincerely,

ACCSES

American Association on Health and Disability

The Arc of the United States

Association of Assistive Technology Act Programs (ATAP)

Association of University Centers on Disabilities

Attention Deficit Disorder Association (ADDA)

Autism National Committee (AutCom)

Bazelon Center for Mental Health Law

Brain Injury Association of America

Community Legal Services, Inc.

Consortia of Administrators of Native American Rehabilitation

CSH

Disability Rights Education & Defense Fund

Easter Seals

Health & Disability Advocates

Lupus Foundation of America

Lutheran Services in America Disability Network

Mental Health America

National Alliance on Mental Illness

National Association of Councils on Developmental Disabilities

National Association of Disability Representatives

National Association of State Head Injury Administrators

National Committee to Preserve Social Security and Medicare

National Multiple Sclerosis Society

National Organization of Social Security Claimants' Representatives

National Senior Citizens Law Center

Paralyzed Veterans of America

Special Needs Alliance

United Cerebral Palsy