



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

November 22, 2006

Sylvester J. Schieber, Chairman
Jeffrey R. Brown
The Honorable Dorcas R. Hardy
Marsha Katz
The Honorable Barbara B. Kennelly
Social Security Advisory Board
400 Virginia Ave, SW - Suite 625
Washington, DC 20024

Dear Chairman Schieber and Members of the Board:

The undersigned members of the Consortium for Citizens with Disabilities (CCD) thank the Board for your recent report, *A Disability System for the 21st Century*, and your attention in the past several years to the important issue of reducing barriers to employment for Social Security and SSI disability beneficiaries. We will take time to carefully review the report and provide you with a detailed response at a later point.

We feel it necessary, however, to immediately note for the record our concerns about some of the statements made in the report regarding the Social Security disability programs. We are particularly concerned about the following statement on page 6, which is echoed in other places in the report:

However, we have heard widespread agreement that the current overall approach to disability is harmful to people with disabilities, is contrary to basic societal values, and, in particular, contradicts the policies and values of the Americans with Disabilities Act. We concur in that judgment.

In fact, the Social Security disability programs, including the Supplemental Security Income program and disability coverage in the Old Age, Survivors, and Disability Insurance programs, provide vital and much-needed income and access to health care for those whose impairments are so severe that they preclude substantial work, given their current circumstances. This is an appropriate societal response and reflects the core American value of assisting those in need.

In addition, we do not agree that the Social Security disability programs are in contradiction with the policies and values of the Americans with Disabilities Act (ADA), a statement that is repeated several times throughout the report. The goal of the employment provisions of the ADA is to ensure that people who are able to work will have fair opportunities to work, unhindered by discrimination on the basis of disability. The Social Security programs were created to provide basic income and access to

health care for those who cannot work or whose work capacity is very limited. The Social Security disability programs make it possible for people with the most severe work impairments to live a self-directed, independent life with a measure of dignity and economic security. Their circumstances would be far worse without these vital programs.

CCD has long advocated for improvements to the Social Security programs, such as removing the remaining barriers in the program for those who want to return to or attempt to work. Congress has taken steps along these lines many times over the last two decades and we will continue to work with Congress and the Administration to address the remaining barriers. While more work remains to be done, it would be inaccurate and misrepresentative to characterize these Social Security programs as harmful to people with disabilities.

The Board has clearly identified and given thoughtful attention to gaps in the continuum of national disability policy, including gaps between other national programs designed to support people with disabilities. Providing additional supports and services to those with some capacity to work would help to fill a need that is not fully addressed, in practice, by existing programs. We appreciate the Board's effort to provide recommendations to address these existing inadequacies. As noted above, we will carefully review the recommendations made in the report and respond to them in more detail at a future date.

Thank you for the opportunity to provide input. We look forward to continued work with the Board.

Sincerely,

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ON BEHALF OF:

ADA Watch/National Coalition for Disability Rights
American Association on Mental Retardation

American Council of the Blind
American Dance Therapy Association
American Network of Community Options and Resources
Bazelon Center for Mental Health Law
Council for Learning Disabilities
Easter Seals, Inc.
Epilepsy Foundation
Federation of Families for Children's Mental Health
Goodwill Industries
Helen Keller National Center
Learning Disabilities Association of America
Mental Health America (*formerly* National Mental Health Association)
National Alliance on Mental Illness
National Association of Councils on Developmental Disabilities
National Association of Social Workers
National Coalition on Deaf-Blindness
National Council for Community Behavioral Healthcare
National Disability Rights Network
National Down Syndrome Society
National Organization of Social Security Claimants' Representatives
National Respite Coalition
Paralyzed Veterans of America
Research Institute for Independent Living
The Arc of the United States
United Cerebral Palsy
United Spinal Association

cc: The Honorable Hal Daub
David Podoff