



**CONSORTIUM FOR CITIZENS  
WITH DISABILITIES**

**STATEMENT FOR THE RECORD**

**Hearing before the  
House Committee on Ways and Means**

**Promoting Work Opportunities for Social Security  
Disability Insurance Beneficiaries**

**July 9, 2015**

**Statement submitted on behalf of the undersigned members of the  
Social Security Task Force, Consortium for Citizens with Disabilities:**

Easter Seals  
Health & Disability Advocates  
Justice in Aging  
Lutheran Services in America Disability Network  
National Alliance on Mental Illness  
National Association of Disability Representatives  
National Committee to Preserve Social Security and Medicare  
National Disability Rights Network  
National Organization of Social Security Claimants' Representatives  
Paralyzed Veterans of America  
The Arc of the United States  
The Jewish Federations of North America  
United Spinal Association

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Chairman Ryan, Ranking Member Levin, and Members of the Committee, the undersigned members of the Consortium for Citizens with Disabilities (CCD) Social Security Task Force submit this Statement for the Record for the July 9, 2015 hearing on "Promoting Work Opportunities for Social Security Disability Insurance Beneficiaries."

The CCD is a coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of the approximately 57 million children and adults with disabilities in all aspects of society. The CCD Social Security Task Force focuses on disability policy issues in the Title II disability programs and the Title XVI Supplemental Security Income (SSI) program.

## **Congress Must Ensure the Financial Future of Social Security Benefits**

Our nation's Social Security system insures nearly all American workers and their families for retirement and in the event that a worker experiences a qualifying disability, or dies. As part of this system, Social Security Disability Insurance (SSDI) provides modest but vital financial assistance to approximately 11 million Americans. SSDI helps beneficiaries with disabilities and their families to meet their everyday needs -- keeping a roof over their heads, putting food on the table, paying for out-of-pocket medical and disability-related expenses, and paying for other basic living expenses.

The CCD Social Security Task Force strongly supports efforts to help beneficiaries to obtain and maintain employment to expand economic opportunity and promote self-determination, independence, empowerment, integration, and inclusion. Improving the SSDI program work incentives and providing better employment supports and services is an essential part of these efforts. Below, we provide highlights of the many recommendations for strengthening SSDI work incentives that the CCD Social Security Task Force has made over the last several decades.

With the impending depletion of the Disability Insurance (DI) Trust Fund, beneficiaries face a 20 percent across-the-board benefit cut in just over one year. Given the critical role that SSDI plays in the lives of beneficiaries and their families, our longtime position is that limiting coverage or eligibility or cutting benefits will harm beneficiaries and their families, and will not help anyone to work. **What is needed is a guarantee that SSDI will be maintained through reallocation, without cutting coverage, eligibility, or benefits, to ensure continued benefits through 2034.**

Congress has known for nearly two decades that Social Security's DI Trust Fund will need to be replenished by 2016. The need for action now is no surprise, but stems from long-term demographic trends including an aging workforce now in its disability-prone years, and an increase in work by women that has led to an increase in women's eligibility for Social Security including SSDI based on their own work records.

Reallocation will ensure that SSDI is available to both current and future beneficiaries, including the 7 in 10 SSDI beneficiaries who are age 50 and older. SSDI benefits average just under \$40 per day for workers with disabilities. Benefits make up the majority of income for 4 out of 5 beneficiaries and provide the sole source of income for 1 in 3 beneficiaries. The impact of any reduction in benefits could be truly devastating.

Congress needs to act expeditiously, as it has done many times in the past, to reallocate existing payroll taxes between Social Security's DI and Old-Age and Survivors' Insurance (OASI) funds. Last year, using data from the 2014 Social Security Trustees Report, Social Security's actuaries found that both trust funds would be able to pay full scheduled benefits through 2033 by temporarily raising the 1.8 percent DI share of the current 12.4 percent Social Security payroll contribution to 2.8 percent in 2015 and 2016, and then gradually reducing it back to 1.8 percent by 2025. Congress has reallocated between Social Security's funds in this manner about equally in both directions to keep the system on an even reserve ratio -- 6 times using a narrow definition of reallocation, and 11 times using a broader definition of reallocation. As outlined last year by the actuaries, reallocation does not require any new taxes and would maintain the long-term solvency of the combined Social Security trust funds for approximately 18 years.

A reallocation that equalizes Social Security's trust funds -- without any accompanying cuts to Social Security coverage, eligibility, or benefits -- is the common sense, responsible solution that Congress should enact promptly. Such a reallocation is needed to keep Social Security's promise to the more

than 165 million Americans who currently contribute to the system and the nearly 11 million Americans who currently receive SSDI benefits.

## **CCD Recommendations for Improving Employment Opportunities for SSDI Beneficiaries**

Since CCD's founding in 1973, the Consortium and the CCD Social Security Task Force have developed numerous recommendations for strengthening SSDI. We believe that proposed changes to any program, including SSDI, *must be developed and evaluated by looking beyond budgetary effects to understand the actual impact on people's daily lives now and in the future.* The recommendations below seek to strengthen SSDI to make it work better for people with disabilities and their families.

The CCD Social Security Task Force strongly supports increasing efforts to help people with significant disabilities to work to their fullest potential. The basic structure of the Social Security Title II and SSI disability programs is sound and should be preserved, but much more can be done to increase economic security and employment among current and future beneficiaries. The CCD Social Security Task Force has written extensively and testified before Congress on numerous occasions, regarding the multi-faceted approaches needed to modernize the Social Security disability programs to increase opportunities for beneficiaries to work, to provide support to help people with disabilities remain attached to the labor force, and to deliver the training, services and supports that people with disabilities, including SSDI and SSI beneficiaries, may need to return to work.

The Task Force has developed the following Reform Principles to guide our recommendations.<sup>1</sup>

### **Principle 1: Preserve the basic structure of Social Security's disability programs, including the definition of disability.**

Social Security's disability programs are critical to people with disabilities and their families. Their basic structure is effective and should be preserved. Any efforts to change the Social Security disability programs must protect and expand the effectiveness of these income support programs, as well as protect access to the corresponding health coverage provided through Medicare and Medicaid. Additionally, because the intent of the Social Security disability programs is to provide income support for individuals who do not have the capacity to work, the existing definition of disability is appropriate. The current definition is strict, providing benefits only to individuals with the most significant impairments. The current structure also provides sufficient flexibility to allow for policies that promote employment for beneficiaries who are able to do some work.

### **Principle 2: Efforts should be made to increase employment opportunities and improve employment outcomes for Social Security disability beneficiaries, but those efforts should not be achieved through any tightening of eligibility criteria for cash benefits and/or narrowing of health care benefits.**

CCD supports new legislative and regulatory proposals that could increase employment opportunities for individuals with disabilities who receive Social Security disability benefits. However, **new initiatives should be funded outside of the Social Security disability benefit structure and should not come at the expense of existing Social Security disability benefits.** A top priority for CCD is to retain current eligibility criteria for income support and associated health care

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<sup>1</sup> "Disability Program Reform Principles," CCD Social Security Task Force, March 2012. [http://www.c-c-d.org/fichiers/CCD\\_SS-Disability\\_Program\\_Reform\\_Principles3-2012.pdf](http://www.c-c-d.org/fichiers/CCD_SS-Disability_Program_Reform_Principles3-2012.pdf).

**benefits while also promoting ways to improve employment outcomes for individuals with disabilities who have the capacity for work.**

Programs designed to allow flexibility for people with disabilities to return to work, including programs authorized under the Ticket to Work and Work Incentives Improvement Act (TWWIIA), should be supported in order to provide Social Security disability beneficiaries with the flexibility they need to return to work. These programs offer people with disabilities the options to try different work opportunities without risk of losing their benefits should a return to work be unsuccessful. Providing individuals with disabilities the opportunities to work up to their capacity without risking the vital income support and health care coverage allows them the chance to increase their independence and self-sufficiency.

**Principle 3: Given that Social Security disability program beneficiaries have already been found unable to perform substantial gainful activity, participation in work or activities to prepare for work should remain voluntary.**

While it is critical that high-quality employment services be made readily available to all beneficiaries, the person with a disability is in the best position to evaluate his or her own health condition and ability to participate in such activities. Because many people with disabilities face great challenges in returning to work, and because of the significant diversity of disabilities represented within the Social Security disability programs, receipt of Social Security disability benefits should not be conditional on participation in work or work preparation activities. CCD therefore opposes any type of work requirements in the Social Security disability programs, including any requirements that beneficiaries participate in community service, volunteer work, vocational rehabilitation, training, or other pre-employment activities as a condition of receiving benefits or to avoid sanctions.

**Principle 4: Eligibility and cash benefits should not be subject to time limits.**

In our experience, even those beneficiaries who eventually attain self-supporting employment may take a long time to do so. Placing arbitrary time limits on benefits could be counterproductive and exacerbate physical or mental health problems. It is also impossible to predict who might be able to work at a self-sustaining level as the course a disability or illness may take is unpredictable and definitely not known ahead of time. For those who are not able to attain a significant level of employment, or not able to do so within the prescribed time frames, a time-limited program would greatly increase the need for repeated applications and adjudications, causing great stress for beneficiaries as well as increased administrative costs for the Social Security Administration. The current policy of conducting continuing disability reviews avoids these problems and additional costs, while ensuring that individuals who no longer qualify for the program have their benefits terminated.

**Recommendations for Work Incentives**

Some of our major recommendations for modernizing the Social Security disability program work incentives are discussed below. We believe that these kinds of reforms should be the first line of exploration when considering options for strengthening the Title II and Title XVI disability programs, and have the best chance of increasing employment while ensuring that people with the most significant disabilities do not risk the loss of vital income support.

As noted above, development of any system to enhance work among SSDI and SSI beneficiaries must start with the needs of beneficiaries and be designed to meet those needs. Although we believe reforms are urgently needed to maximize opportunities for SSDI and SSI beneficiaries to work, we do not expect significant cost savings from these reforms. If cost saving becomes the major driver of Social Security disability program reform, the unintended consequences for current and potential beneficiaries could be severe.

As a general matter, we have serious concerns that people with disabilities could be hurt by implementation of untested proposals. Additionally, certain proposals could have the unintended consequence of actually making it *more* difficult for people with disabilities to obtain employment. We urge thoughtful consideration and testing prior to endorsing or implementing changes to the Social Security disability programs. In addition, we urge caution in considering changes that could cause individuals to lose access to SSDI or SSI benefits.

Further, we believe that modernizing the Social Security disability programs to improve employment outcomes must occur in close coordination with enhancement of a range of other vital supports and services to ensure that workers with disabilities have a fair shot. In our experience working with people with disabilities, a myriad of factors contribute to the high rate of unemployment among beneficiaries with disabilities. These include the systemic lack of access to post-secondary education, employment services, health insurance, long-term supports and services, and paid leave and sick days, as well as the need for easily accessible, reliable transportation and affordable, accessible housing. All of these factors can conspire to trap people with disabilities in a cycle of poverty, and must be considered and addressed in constructing a system to assist beneficiaries with disabilities to achieve greater economic self-sufficiency.

#### **A. Decouple access to supports and services from Social Security disability**

As attitudes and expectations regarding people with disabilities have evolved over time, so has our nation's system of programs designed to support people with disabilities to live independently. Though the purpose of the Social Security disability programs is partial wage replacement for people experiencing limited earnings capacity, these programs became the "gateway" for accessing other needed supports and services. Many other important programs use eligibility for Social Security disability benefits to determine eligibility for the other benefits. For example, receiving a disability determination from Social Security and receiving SSI automatically entitles a person to receive Medicaid in most states; similarly, SSDI eligibility confers eligibility for Medicare, after a 24-month wait. While access to healthcare via Medicare and Medicaid should not be jeopardized in any way for SSDI and SSI beneficiaries, we believe there should be pathways to accessing public health insurance for all individuals with disabilities, without needing to apply and be found eligible for income support benefits (whether needed or not) as a prerequisite to accessing the services and supports they need.

#### **B. Strengthen the Social Security work incentives**

The CCD Social Security Task Force highlights the following recommendations to provide greater support to allow beneficiaries to work to their fullest capacity. These represent some of our key recommendations over the years, but are by no means comprehensive.

- **Renew SSA's Title II demonstration authority.**

SSDI beneficiaries face a complex set of rules regarding earnings, and, in the case of concurrent beneficiaries who receive SSDI and SSI, regarding assets as well. Demonstrations allow SSA to test

additional ways to help beneficiaries navigate the system and can provide important information about effective strategies for assisting beneficiaries in attempting to work or return to work. Currently, SSA has demonstration authority for its Title XVI programs, but demonstration authority for the Title II programs expired in 2005. Congress should extend SSA's Title II demonstration authority and should include the same protections for beneficiaries included in the Title XVI demonstration authority.

The CCD Social Security Task Force has principles for Title II demonstrations, available at:

[http://c-c-d.org/fichiers/CCD\\_SS-Disability\\_Demonstration\\_Principles-Final-1-14.pdf](http://c-c-d.org/fichiers/CCD_SS-Disability_Demonstration_Principles-Final-1-14.pdf)

- **Ensure continuation of the Work Incentive Planning and Assistance (WIPA) and Protection and Advocacy for Beneficiaries of Social Security (PABSS) programs.**

WIPA and PABSS, established in 1999, provide critically important employment services that help beneficiaries of Social Security's SSDI and SSI disability programs attain greater economic self-sufficiency. WIPA grants go to local non-profits and other agencies to support outreach, education, and benefits planning services for SSI and SSDI beneficiaries about work incentives and services for finding, maintaining, and advancing in employment. WIPA grantees inform beneficiaries about the impact that employment will have on their disability income and medical coverage, and address many of the real fears that individuals have about going to work at the risk of losing health coverage. PABSS provides a wide range of services to SSI and SSDI beneficiaries. This includes information and advice about obtaining vocational rehabilitation and employment services, information and referral services on work incentives, and advocacy or other legal services that a beneficiary needs to secure, maintain, or regain gainful employment. The WIPA and PABSS programs should be permanently authorized and fully funded to prevent service interruptions and loss of well-trained and skilled employees.

- **Improve program navigation and remove barriers to work.**

Over the years, the CCD Social Security Task Force has developed a number of proposals to make it easier for beneficiaries to navigate the SSDI system, particularly when attempting work. As we have noted in prior testimony before Congress, the Task Force generally supports efforts to improve the disability claims process, including through the use of technology, so long as the changes do not infringe on claimants' rights. SSA has already implemented a number of significant technological improvements that have helped claimants and their representatives and have made the process more efficient for SSA employees.

As discussed below, we strongly recommend that SSA develop a better wage reporting and recording system and ensure prompt adjustment of benefit payments to minimize overpayments. Some individuals with disabilities are wary of attempting a return to work out of fear that this may give rise to an overpayment if their earnings are not properly recorded and monthly benefits are not properly and promptly adjusted.

- **Establish an earnings offset in the SSDI program.**

One of the most difficult and enduring barriers to work for SSDI beneficiaries is the sudden termination of cash benefits when someone crosses the substantial gainful activity (SGA) threshold after the trial work period. This affects both the individual's benefits as well as those of any dependent(s).

The CCD Social Security Task Force has long been on record supporting the creation of a benefit offset in SSDI to eliminate the work disincentive created by the cash cliff and create a ramp off of benefits to better support return to work for beneficiaries. There is over 25 years of experience regarding the effects of an offset on beneficiaries from the SSI program under the Section 1619 program, which Congress made permanent in 1987 following a demonstration period of 7 years. Combined with the results of the 4 state pilots undertaken in the early 2000s in SSDI, there is ample evidence that Congress should enact a benefit offset in SSDI.

Last year, in response to a request by Majority staff of the House Ways and Means Social Security Subcommittee, the CCD Social Security Task Force developed a unified SSDI benefit offset proposal. We have shared and discussed our proposal with both the Majority and Minority Subcommittee staffs. Our proposal includes the following features:

1. Benefit offset level: \$1 benefit offset for every \$2 of earnings over the earning disregard threshold.
2. Earning disregard threshold: Initial earning disregard should be set *no lower than* the current law Trial Work Level (TWL) period earning threshold of \$780 for 2015 (if adopted in 2016 or after should begin with scheduled TWL earning threshold for that year). The earning disregard threshold for SSDI should be indexed in the same manner that TWL is currently indexed annually.
3. The earned income disregard in the Supplemental Security Income (SSI) program should also be increased to the level it would be at if it had been indexed since its inception. The earned income disregard in the SSI program should be indexed after it is increased. For example, the CCD Social Security Task Force is supportive of the approach taken by the Supplemental Security Income Restoration Act (\$112 general income disregard, \$364 earned income disregard).
4. Eliminate the Trial Work Period and Extended Period of Eligibility. Rather, earnings should never cause a SSDI beneficiary's eligibility to be terminated. Instead, benefit eligibility should be put in suspension in any month that a beneficiary's earnings rise to the level that no benefit is payable. A SSDI beneficiary's eligibility should only be terminated if the individual has medically improved and no longer has a disabling impairment according to the Title II definition of disability.

The proposal includes other administrative and work incentives proposals. Our full proposal is available at:

[http://www.c-c-d.org/fichiers/CCD\\_Final\\_Benefit\\_Offset\\_Proposal.pdf](http://www.c-c-d.org/fichiers/CCD_Final_Benefit_Offset_Proposal.pdf)

The structure and features of SSDI benefit offset proposals matter greatly. The CCD Social Security Task Force proposal came out of extensive research and discussion about what elements must be present to promote work while also ensuring the adequacy of SSDI benefits which have been paid for by workers with disabilities. Our proposal is a unified design, not a menu of options. Additionally, proposals that lack key elements – such as continued attachment to SSDI and Medicare – or that set the earnings disregard threshold lower than the TWL could erode the financial security of SSDI beneficiaries and their families, create new work disincentives in the SSDI program, and increase overpayment rates.

- **Provide a “continued attachment” to SSDI and Medicare, for as long as a beneficiary’s impairments last.**

Beneficiaries who are sometimes able and other times unable to be employed should have continued attachment to cash and medical benefits that can be activated with a simple and expedited procedure that is as “seamless” as possible.

For example, SSA has proposed the Work Incentives Simplification Pilot (WISP). Under the WISP, work would no longer be a reason for terminating SSDI benefits. SSA would continue to pay cash benefits for any month in which earnings were below the established threshold, but would suspend benefits for any month in which earnings were above the threshold. SSA would evaluate whether this pilot simplification reduces the number of improper payments due to work, and allows the agency to redirect those administrative resources to other areas.

As noted above, “continued attachment” is also an essential feature of the CCD Social Security Task Force benefit offset proposal.

- **Preserve and strengthen programs designed to allow flexibility for people with disabilities to return to work, including programs authorized under the Ticket to Work and Work Incentives Improvement Act (TWWIIA).**

These programs offer people with disabilities the option to try different work opportunities without risk of losing their benefits should a return to work be unsuccessful. Providing individuals with disabilities opportunities to work up to their capacity without risking vital income support and health care coverage promotes their independence and self-sufficiency.

One critical enhancement that the CCD Social Security Task Force has recommended for many years is to increase the Substantial Gainful Activity (SGA) level for all beneficiaries to be the same as the SGA level for beneficiaries who are blind.

In addition, as highlighted in testimony by the CCD Employment and Training Task Force (<http://waysandmeans.house.gov/UploadedFiles/TTWWIIATest.pdf>), several statutory problems with TWWIIA have yet to be addressed by Congress. Among these are the law's disconnect between its eligibility standard and Social Security's normal retirement age; the inability of those working past age 65 to participate in a Medicaid buy-in; prohibitions against Ticket holders receiving more than one ticket; and the requirement that a beneficiary wait 24 months after reinstatement to the benefit rolls before he or she can use the work incentives again. Additionally, the existing expedited reinstatement program could be improved by making the following changes: (1) eliminate the 60-month time limit; (2) provide provisional cash and medical benefits until SSA processes the request for reinstatement (current rules limit provisional benefits to 6 months); (3) ensure that SSA promptly reinstates both cash and medical benefits once the agency has approved the reinstatement; (4) explicitly recognize that people may use expedited reinstatement repeatedly; and (5) provide that beneficiaries are eligible for expedited reinstatement if they are unable to engage in SGA when they are no longer working.

- **Reject proposals to create new work disincentives.**

The CCD Social Security Task Force strongly opposes any proposals that would create new work disincentives in the SSDI or SSI programs, including proposals to eliminate or reduce concurrent SSDI and Unemployment Insurance (UI) benefits, such as the “Social Security Disability Insurance

and Unemployment Benefits Double Dip Elimination Act of 2015” (S. 499; H.R. 918) and the “Reducing Overlapping Payments Act of 2015” (S. 343).

As noted in a letter signed by 75 national organizations, including members of CCD, the Coalition on Human Needs, and the Strengthen Social Security Coalition, SSDI and UI are vital insurance systems, paid for by workers and their employers, and established for different purposes. Receiving UI and SSDI concurrently is legal and appropriate. Proposed cuts to concurrent SSDI and UI benefits run counter to decades of bipartisan federal policy seeking to open up employment opportunities for SSDI beneficiaries. These proposed cuts single out SSDI beneficiaries, treating them differently from other workers insured under the UI program, and penalize SSDI beneficiaries who have attempted to work by cutting or putting at risk their SSDI benefits. Our full letter is available at:

<http://c-c-d.org/fichiers/CCD-Letter-DI-UI-03-17-15FINAL.pdf>

- **Improve the rules for impairment-related work expenses (IRWE).**

Under current program rules, beneficiaries can deduct from earned income the costs of IRWEs for SGA determinations. The IRWE deduction can be a significant work incentive by allowing individuals with disabilities to obtain services, medical items, and other assistance that allow them to engage in work activity. CCD proposals for revising IRWE include:

- ✓ ***Apply the current SSI blindness rule to SSDI disability claimants and beneficiaries to allow the consideration of all work expenses, not only those that are “impairment-related.”*** Currently, for Title II and SSI disability claimants and beneficiaries, only those work expenses that are “impairment-related” are considered. However, the SSI income-counting rules for individuals who qualify based on statutory blindness are more liberal because all work expenses can be deducted, not only those that are “impairment-related.” There is no public policy basis for this continued disparate treatment of people with different significant disabilities.
- ✓ ***Allow beneficiaries to include their health insurance premiums as IRWEs.*** This would recognize the higher costs incurred by workers with disabilities who must pay premiums for the Medicaid Buy-In or for continued Medicare after the termination of free Part A benefits.
- ✓ ***Increase the SGA level for all beneficiaries to be the same as the SGA level for beneficiaries who are blind,*** and maintain annual indexing of the SGA to adjust for inflation and cost of living increases.
- **SSA must receive sufficient administrative funding in order to process earnings reports timely and adjust benefits as appropriate.**

When a disability beneficiary goes to work, she is required to report her earnings to SSA so that benefits can be adjusted and a work CDR performed as appropriate. If the earnings report is processed in a timely manner, benefits are adjusted and no overpayment results. However, if SSA lacks the staff capacity required to process earnings reports in a timely manner, beneficiaries who have earnings from work are likely to receive overpayments despite reporting their earnings timely to SSA. The longer the delay in processing, the larger the overpayment will be. According to Acting Commissioner of Social Security Carolyn Colvin in testimony delivered to the Social Security Subcommittee of the House Committee on Ways and Means in January 2012, SSA has allocated additional resources to work CDRs, targeting cases with the oldest earnings reports—those more than a year old – but that the agency still has a significant backlog of medical CDRs. Acting

Commissioner Colvin further testified at that hearing that it takes more than 270 days on average for SSA to complete a work CDR. Every month that passes from the time that a beneficiary reports earnings before a work CDR is completed increases the likelihood of a large, preventable overpayment.

This delay in processing of earnings reports can have a significant detrimental impact on people with disabilities. When beneficiaries faithfully notify SSA of earnings or other changes that may reduce their benefit payment amounts, as noted above, it may be months or years before SSA sends an overpayment notice to the beneficiary, demanding repayment of sometimes tens of thousands of dollars of accrued overpayments. It can be shocking and anxiety-provoking to receive such a notice, particularly when the beneficiary reasonably assumed that SSA had processed the information they submitted. Moreover, it can be challenging, if not impossible, for someone subsisting on benefits alone to repay an overpayment of even a few thousand dollars, let alone tens of thousands of dollars or more.

Some individuals with disabilities are wary of attempting a return to work out of fear that this may give rise to an overpayment, jeopardizing their economic stability. SSA needs to develop a better reporting and recording system and ensure prompt adjustment of benefit payments to minimize overpayments due to reported earnings. It is important to note that, in and of themselves, overpayments do not indicate fraud or abuse as beneficiaries are encouraged to work if they are able. The problems arise when reported earnings are not properly recorded and monthly overpayments are not properly adjusted. SSA must have adequate resources and staffing to allow the agency to reduce both the backlog and processing time of earnings reports.

### **Conclusion**

Thank you for the opportunity to submit this Statement for the Record of the July 9, 2015, hearing on Promoting Work Opportunities for Social Security Disability Insurance Beneficiaries. The Social Security disability programs are a vital part of our nation's Social Security system, and provide nothing short of a lifeline to people with significant disabilities. We look forward to working with you in the future as you consider ways to strengthen these vital programs for current and future beneficiaries.

### **Submitted on behalf of the undersigned members of the Social Security Task Force, Consortium for Citizens with Disabilities:**

Easter Seals  
Health & Disability Advocates  
Justice in Aging  
Lutheran Services in America Disability Network  
National Alliance on Mental Illness  
National Association of Disability Representatives  
National Committee to Preserve Social Security and Medicare  
National Disability Rights Network  
National Organization of Social Security Claimants' Representatives  
Paralyzed Veterans of America  
The Arc of the United States  
The Jewish Federations of North America  
United Spinal Association