

April 21, 2020

The Honorable Steven T. Mnuchin Secretary of Treasury 16US Department of the Treasury 1500 Pennsylvania Avenue NW Washington, DC 20220

The Honorable Andrew Saul Commissioner of Social Security Administration US Social Security Administration 1300 D Street SW Washington, DC 20024

The Honorable Robert Wilkie Secretary of Veterans Affairs US Department of Veterans Affairs 810 Vermont Avenue NW Washington, DC 20571

Dear Secretary Mnuchin, Commissioner Saul, and Secretary Wilkie:

The undersigned organizations, which are members and allies of the Consortium for Citizens with Disabilities (CCD), write in response to your recently announced deadline for Social Security beneficiaries to file taxes or utilize the new web tool to claim economic impact payments for child dependents under the age of 17 or wait until 2021 to claim the payments. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. We represent the parents with disabilities receiving Social Security Disability Insurance who must now meet this deadline, along with the disabled widows and widowers with children and the retiree grandparents who have disabilities or have adopted grandchildren with disabilities.

We are extremely concerned by the unexpected announcement of this very short deadline. Announcing a Wednesday deadline on a Monday afternoon is simply put, not enough time. Media reports that the deadline is noon on Wednesday (with the time zone unspecified) add to the urgency and the confusion. The new non-filers web tool only became available on April 10, less than two weeks ago. Reports to our organizations have made it clear that the web tool is not usable via most cell phones and that it is not compatible with some screen-reader programs used by people who are blind or have visual impairments. The web tool is also an internet-only solution that has not taken into account the needs of people who do not have regular access to the internet

(a problem compounded by stay-at-home orders and closures of public libraries). As we raised in our prior letter, there is significant confusion as to how the web tool works for those who do not have bank accounts, do not have account information and routing numbers readily available, or who prefer a paper check or a deposit to a Direct Express card. The Get My Payment tool, also recently released on April 17, does not allow Social Security beneficiaries to check their status, meaning that none of the individuals who are required to submit the information by Wednesday at noon can verify if their information is correctly entered or received by Treasury. By setting such a short deadline and providing insufficient web tools, Treasury and the other agencies are failing people with disabilities, their children, and other Social Security beneficiaries with eligible children. We urge the Agencies to eliminate this deadline and make payments on a rolling basis as information is submitted to the web tool.

We understand and support the agencies' desire to issue Economic Impact Payments as quickly as possible, but this solution does not take into account the serious outreach efforts that are necessary to reach these populations. As we have pointed out in prior letters, efforts to reach Social Security, SSI, and VA Disability Compensation and Veterans Pension beneficiaries in 2008 when the IRS last issued economic stimulus payments faced major challenges and left out 17 percent of beneficiaries. The issues we identified in our prior letter continue to be challenges, including lack of internet access, physical and electronic accessibility issues, and legally required reasonable accommodations and assistance for people with disabilities in understanding what is required. The Agencies must undertake outreach to these populations and create options for them. To balance this need with the need to issue payments quickly, we also urge the Agencies to adopt several deadlines that allow individuals to submit their information over the course of the year and be paid as these deadlines pass. By creating a system that requires action within the next 48 hours or forces families to wait until 2021, the Agencies are failing to reflect Congressional intent of these payments: to assist people in getting through this moment of crisis and allow them to stimulate the economy.

Thank you for your consideration of this important issue for Social Security, SSI, VA Disability Compensation, and Veterans Pension beneficiaries. The United States is currently in an unprecedented time and we must all work together to accommodate all persons. We stand ready to work with you to find solutions to this vital issue. Please do not hesitate to contact Bethany Lilly (lilly@thearc.org) or Stacy Cloyd (stacy.cloyd@nosscr.org) with any questions or to arrange for a meeting.

Sincerely,

Access Living
ACCSES
ADAPT Montana
Alabama Disabilities Advocacy Program
Alliance for Aging Research
Alliance for Retired Americans
American Academy of Pediatrics
American Association of Kidney Patients
American Association of People with Disabilities
American Association on Health and Disability
American Council of the Blind

American Diabetes Association

American Kidney Fund

American Network of Community Options & Resources (ANCOR)

Association of People Supporting Employment First (APSE)

Association of Programs for Rural Independent Living

Atlanta Legal Aid Society

Autism Society of America

Autistic Self Advocacy Network

Autistic Women & Nonbinary Network

Bay Area Community Services

Benefits Law Center

California Access Coalition

California Association of Food Banks

Californians for Disability Rights Inc

Center for Disability Rights

Center for Law and Social Policy (CLASP)

Center for Public Representation

Center for Survivor Agency & Justice

Charlotte Center for Legal Advocacy

Children's Law Center

Church World Service

Coalition on Human Needs

Communities Actively Living Independent & Free

Community Legal Aid Society, Inc., Delaware

Community Legal Services

Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces

Congress of California Seniors

Cystic Fibrosis Research, Inc. (CFRI)

Davis Phinney Foundation

DC KinCare Alliance

Democratic Disability Caucus of Florida

Disability Law Center

disAbility Law Center of Virginia

Disability Law Center, Massachusetts

Disability Rights California

Disability Rights Center - NH

Disability Rights Connecticut

Disability Rights Education & Defense Fund (DREDF)

Disability Rights Iowa

Disability Rights Maine

Disability Rights MD

Disability Rights New Jersey

Disability Rights New York

Disability Rights North Carolina

Disability Rights TN

Disability Rights Vermont

Empire Justice Center

Epilepsy Foundation

Epilepsy Foundation New England

Equal Rights Advocates

Equality North Carolina

First Focus on Children

Food for People, the Food Bank for Humboldt County

Fund for Community Reparations for Autistic People of Color's Interdependence, Survival, and

Empowerment

Georgia Legal Services Program

Global Liver Institute

Global Policy Solutions

GO2 Foundation for Lung Cancer

Gray Panthers

Health Hats

Healthcare Rights Coalition

Homeless Action Center

Homeless Advocacy Project

Homeless Persons Representation Project

Houston Center for Independent Living

Independent Living Center of the Hudson Valley, Inc.

Inner City Law Center

Japanese American Citizens League

The Jewish Federations of North America

Justice in Aging

Kentucky Protection and Advocacy

Lakeshore Foundation

Latinos for a Secure Retirement

Law Foundation of Silicon Valley

Legal Aid at Work

Legal Aid Foundation of Los Angeles

Legal Aid Justice Center

Legal Aid Society of Columbus

Legal Aid Society of the District of Columbia

Legal Council for Health Justice

Liberty Resources

Lupus and Allied Diseases Association, Inc.

Medicare Rights Center

Multiple Sclerosis Foundation

NAACP

National Academy of Elder Law Attorneys

National Advocacy Center of the Sisters of the Good Shepherd

National Association of Councils on Developmental Disabilities

National Association of the Deaf

National Center for Lesbian Rights

National Coalition for the Homeless

National Committee to Preserve Social Security and Medicare

National Council on Independent Living

National Disability Rights Network

National Down Syndrome Congress

National Education Association

National Federation of the Blind

National Health Law Program

National Low Income Housing Coalition

National Multiple Sclerosis Society

National Organization of Social Security Claimants' Representatives

National Women's Law Center

Native American Disability Law Center

ND Protection & Advocacy Project

Network of Jewish Human Service Agencies

Not Dead Yet

Paralyzed Veterans of America

Partnership for Inclusive Disaster Strategies

PFLAG National

Pisgah Legal Services

Protection and Advocacy for People with Disabilities

RespectAbility

RESULTS DC

Second Harvest of Silicon Valley

Senior and Disability Action

Social Security Works

Southeast Louisiana Legal Services

Starkloff Disability Institute

The Leadership Conference on Civil and Human Rights

The Legal Aid Society

The Legal Aid Society of San Mateo County

The Michael J. Fox Foundation for Parkinson's Research

Union for Reform Judaism

United Cerebral Palsy National

United Spinal Association

United Way of Central Ohio

University of Maryland Carey School of Law, Medical-Legal Partnership Clinic

Urban Justice Center

VetsFirst

Western Center on Law and Poverty

Women's Institute For A Secure Retirement