



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

Tom Klouda, Senate Finance Committee Staff
Amy Shuart, House Ways and Means Committee Social Security Subcommittee Staff
T.J. Sutcliffe, House Ways and Means Committee Social Security Subcommittee Staff
Jeff Wrase, Senate Finance Committee Staff

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Dear Tom, Amy, TJ, and Jeff,

We (cochairs of the Consortium for Citizens with Disabilities) Social Security Task Force appreciate the information you have been able to gather about SSA operations during the pandemic, and know that it has been helpful in improving customer service during this very challenging year.

We wanted to share information about continuing difficulties that claimants, beneficiaries, and representatives are experiencing communicating with SSA field offices and state agencies.

One challenge is for SSDI beneficiaries who qualify for [expedited reinstatement](#) when their earnings decrease. Communications breakdowns within field offices and between field offices and program service centers/payment centers often mean that people are waiting months even for provisional benefits to start. In many cases, the agency has not decided on whether benefits can be reinstated by the time the six months of provisional benefits end. SSA's neglect of this important work incentive is unacceptable.

Another difficulty relates to SSA's need for hands-on verification of identity documents. As you know, SSA is offering in-person appointments only in very limited circumstances: "dire need" situations (field office staff routinely consider people who are in homeless shelters or substandard housing, or who are staying temporarily with others, as not having dire need because they have some housing), certain times that people aged 12 and up are receiving their first Social Security card, and those who need to update their information in order to receive income or benefits. However, SSA notes on its [coronavirus webpage](#) that "appointments may not be immediately available," and we have heard from many members of the public and their representatives that field office staff are refusing to schedule appointments even for weeks and months in the future.

Although SSA finally stated in late December that people should not mail their lawful presence documents (green cards) to field offices, we are aware of people who have been asked to do so

rather than being offered in-person appointments.

SSA has also told advocates that they are working on a “policy flexibility” whereby people who would normally have to submit their drivers’ licenses can send other forms of identification instead, and drivers’ license information can be verified via data sharing. We support these changes and are eager for SSA to make them as soon as possible. People generally cannot [be without drivers’ licenses for over a month](#) because they need identification and the ability to drive legally. However, while we eagerly await the details of this plan we also realize it will not work for everyone, especially those who may not possess multiple forms of identification.

Mailing any sort of documents to SSA can be challenging: documents are sometimes lost at SSA offices or in the mail (the latter of which, as you know, has suffered severe reduction in accuracy and speed), or [returned to the wrong people](#), causing additional delays and risks of identity theft. SSA does not have adequate staff in field offices to process the mail or handle other routine tasks, such as processing appointment of representation forms.

While we understand that some field office staff—and many members of the public—are hesitant to have in-person meetings, SSA must do more to enable business to be conducted despite the pandemic. This could involve technological solutions like allowing people to upload pictures of certain documents through the mySSA system, additional data sharing agreements so that SSA can verify information without the need for hands-on review of documents, or improved appointment scheduling options. There is also room for physical improvements: perhaps some field offices can perform appointments outdoors, create service windows with plexiglass and pass-through drawers (as many banks, libraries, post offices, and liquor stores have before and since the pandemic), or simply have a staff member accept documents at the door of a field office and return them after a quick verification.

Similarly, it can be challenging to communicate with state DDSs, though this varies significantly across different states and offices. In some situations, DDSs are processing cases so quickly that decisions are rendered before the field office processes the appointment of representative form, so there is no way for a representative to communicate with the DDS, receive notices, or submit evidence. Conversely, some cases are lingering for many months at DDSs even when all evidence has been submitted, and DDS staff are uncommunicative when contacted by claimants or their representatives. There is no single timeframe that is appropriate for every single case, but we hope that DDS management, SSA, and Congress will provide data and perform oversight to ensure that each case is processed as accurately and efficiently as possible.

The consequences of SSA’s limited service during the pandemic are enormous. There are people who have not been able to apply for or receive much-needed benefits: SSI awards per capita were at an all-time low in January 2021, with senior citizens especially affected. Some beneficiaries are being overpaid or underpaid because of SSA’s inability to process information from beneficiaries or other sources. We have shared these concerns with SSA leadership on numerous occasions, and while they are receptive and sympathetic, the public’s needs are still

all-too-frequently going unmet. We are grateful for any assistance that Congress is able to provide in improving customer service for Social Security claimants, beneficiaries, and others who require SSA's services. We would be glad to speak with you if it would be helpful.

Sincerely,

Stacy Cloyd, National Organization of Social Security Claimants' Representatives

Tracey Gronniger, Justice in Aging

Bethany Lilly, the Arc of the United States

Jeanne Morin, National Association of Disability Representatives