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Comment from Anonymous

Submitter Information

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General Comment

After the long wait for the unveiling of the SSI FRN, it was quite the letdown and certainly not what SSA has been messaging for the last 2 years. When this initiative was first discussed, it was clearly for all modalities and that SSA would be replacing the SSA-8000 and SSA-8001 with this new simplified application. Because the agency wanted to be proactive, the questions were determined and human-centered testing occurred at the front-end in rapid time. There was a lot of excitement at the agency for this first real change and simplification of a very complex core program in the almost 50 years it has existed. During the presentations, you could tell there was eagerness and a sense of pride in coming up with a solution to this complicated policy dilemma. Imagine the enthusiasm of finally being able to tell the SSI community that SSA understands your challenges with the complex application and they are finally doing something significant about it. Imagine the enthusiasm about being able to walk into the office or take the telephone interview and not feeling like you needed a law degree to understand the questions. If your burden times are accurate, you could have wrapped up your interview in a matter of minutes rather than hours. You wouldn't have gone to hunt down all of your paperwork.

Then to have that enthusiasm implode because SSA was delivering on what they said they would be doing. There is no new application. There is still the hours spent in an interview. There is still the law degree questions that you don't understand and the technician doesn't either so they put them in simpler terms.

I think it is incumbent on SSA to explain the change in direction. Why there was no discussion before the FRN publication that the new simplified SSI application and process that you described in spring of 2022 would not be delivered? Why the SSA-8001 is still being used when the questions for the new application were developed? Why the majority of SSI applicants will see zero relief since they can't or won't file online? Why policy was not updated to make allow for simplification?

As this makes it way through this approval process, I hope your Acting Commissioner and approving official at OMB really ponders why there is no simplified application after 2 years. Why the approval is for the SSA-8001. Maybe this is an acceptable approach to throw something over the wall in a couple of

months but SSA has had 2 years to deliver. Should the FRN say multi-decade plan that never comes fruition instead?