



January 5, 2025

Office of Management and Budget
Attn: Desk Officer for SSA

Social Security Administration, OLCA
Attn: Reports Clearance Director
Mail Stop 3253 Altmeyer, 6401 Security Blvd.
Baltimore, MD 21235

Re: Docket No: SSA-2024-0044

To Whom It May Concern:

These comments are submitted on behalf of the National Organization of Social Security Claimants' Representatives (NOSSCR), a specialized bar association for attorneys and advocates who represent Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) claimants throughout the adjudication process and in federal court.

I. Introduction

Thank you for the opportunity to comment on the Information Collection Activity, specifically as it relates to Integrated Registration Services (IRES) System. As Representatives, we utilize IRES to access our claimants' files via Business Services Online (BSO). This digital access is crucial so that we can review the claimant's file and supply any missing data and information to the agency in a timely and digital manner.

II. Safe and Secure Login Needed to Protect Claimant Data

We encourage the agency to strongly consider ways to enhance the security of the BSO and related Electronic Records Express (ERE) logins, both of which are operated on IRES. The current ERE login system lacks the needed security to properly protect claimant data. Protecting claimant data is of the utmost importance, and as representatives we stand ready to work with the agency to integrate the most secure login procedures into our practices.

III. Representatives' Staff Need Their Own Secure File Access


Under the current BSO login setup, the individual representative is the only person who technically has login access to the represented claimant's file. This is impractical. As the agency knows well, the Social Security disability programs are complex and each case requires many hours (i.e. verifying that needed documents have been received, placing phone calls, waiting on hold, sending mail, sending faxes, etc.). This is true for agency staff and for representatives' staff. To limit file access solely to the individual representative necessarily prevents timely file workup. We strongly encourage the agency to enhance the electronic login system to allow a representative's verified staff member to access claimant files utilizing their own secured logins.

On February 27, 2024, the agency published a Federal Register notice 89 FR 14554, which updated the routine uses for the claims folder systems of record (60-0089)¹ to include disclosure to "their appointed representatives and those working with such representatives (including, but not limited to, partners, associates, and contractors) when the information pertains to the individuals whom the appointed representative is representing." Thus, representatives' staff already have the authority to access the claimants' files; they simply need a secured and verifiable electronic method by which to do so.

IV. Conclusion

Secure digital access for representatives and their staff is paramount to the functioning of the Social Security disability programs. Simultaneously protecting claimants' data is crucial. We encourage the agency to enhance the login security of the BSO, operating on IRES, while also developing a mechanism by which verified members of the representative's staff can also securely access needed claimant information.

Sincerely,



David Camp
Chief Executive Officer

¹ <https://www.ssa.gov/privacy/sorn.html>