

June 16, 2025

**Office of Management and Budget**

Attn: Desk Officer for SSA

**Social Security Administration, OLCA**

Attn: Reports Clearance Director

6401 Security Blvd.

Baltimore, MD 21235

**Re: Docket No: SSA-2025-0012**

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.

We are encouraged that the agency is taking steps to increase the digital capacity and functionality of many of its forms and processes, and we offer the following comments.

**Section I**

*eSignature/Upload Documents* 0960-0830

We commend the agency's progress toward increasing the number of forms available for electronic signature and digital upload. We urge the agency to continue adding forms to the eSignature/Upload portfolio whenever possible.

The agency notes that "eSignature/Upload Documents will implement an enhancement that allows customers to access the Upload Documents link directly from *ssa.gov* or their mySSA account without having to first interact with a SSA technician." This is great news. Freeing up phone lines for calls requiring person-to-person interaction is important, and we are pleased to see progress in this area.

However, we urge the agency to avoid digital-only interactions if the claimant is non-responsive to that method of contact. Not all claimants have reliable access to digital platforms and may miss emails or additions to their online accounts without further person-to-person interaction. While the digital-forward approach is

commended, we urge the agency to ensure that there is a backup plan for those who do not or cannot respond digitally.

One way to enhance the eSignature/Upload Documents platform (and ensure that opportunities for digital signatures and uploads are not missed), would be to expand the platform to include third party responders. As representatives, we have a great capacity to assist claimants in completing forms fully, clearly, and accurately. If representatives and other helpers are enabled to access digital forms on behalf of the claimant, complete the forms with information provided by the claimant, and digitally transfer the forms to the claimant for an allowed digital signature, far fewer forms would face rejection and the need for resubmission. This would reduce the burden on the agency, ensure accurate completion, and improve response time.

While enhancing document upload functionality, we encourage the agency to consider enabling representatives to upload electronic documents at the time of an i-Claim submission (both initial applications and subsequent appeals). This improvement would significantly enhance processing speed and reduce errors by directly linking forms, such as Form SSA-1696, with the related initial application or appeal. The current method of forwarding these documents to field offices for later association causes unnecessary delays, disrupts claim processing, and depletes valuable agency staff resources. By integrating digital form attachment at the time of filing, the agency can streamline the entire process, making it more efficient and user-friendly for all parties involved.

#### *Commercial Product Alternative Signature (CPAS)*

First, as we noted via email to [or.reports.clearance@ssa.gov](mailto:or.reports.clearance@ssa.gov) on May 28, 2025, the included section on CPAS states the following: “Currently, SSA only accepts CPAS for the Commercial Product Alternative Signature (CPAS) process as an additional means for individuals to sign the following eight currently approved agency forms prior to sending them to SSA.”—however, there is no subsequent list included to identify the “eight currently approved agency forms” that are referenced.

NOSSCR is familiar with the CPAS policy that currently exists at EM-25010 (though we’ll note that only seven (7) forms are listed within that EM). As this is the best information we have at this time, our comments assume that the forms referenced within the Information Collection are the same as those currently listed within EM-25010.

We applaud the agency’s move to accept digital signatures without the need for a follow-up attestation call. This saves thousands of hours of agency time and ensures that properly submitted paperwork is not unnecessarily discarded. We encourage the agency to clarify the following points within CPAS:

- 1) We have seen widespread reports that Field Offices are interpreting the EM to mean that the signature, date stamp, and time stamp must all be within the same signature box on the document. There are two problems with this:
  - a. First, Section C1 notes only that the commercial product must a) affix a signer's name on the signature block of the form, b) affix the date the document was signed, and c) affix the time the document was signed. This section makes no mention of where the date and time stamp must be within the document. Later, under Section C4 "Recordkeeping requirements for the submitter," the EM does note that "the signature block must show the name of the person who signed the document and the date and time they signed the document," but as this language does not precisely match the instructions laid out in Section C1, it is causing confusion. Additional clarity within the EM would be appreciated.
  - b. Second, on Form SSA-1696 specifically, the Signature box and the Date box are in two different positions on the paper form. We have seen Field Offices reject an otherwise CPAS-complaint form as incomplete because there is not a "date" in the date box (when, in fact, the date is appropriately included in the digitally created signature block). Additional language clarifying this point within the EM would reduce confusion and produce more successful form completion.
- 2) The EM does not indicate that ALL signatures on a CPAS-signed document must be CPAS signatures. Some representatives are providing acceptable wet signatures on Form SSA-1696 after the claimant has provided an acceptable CPAS signature. These mixed-modality signed forms are being largely rejected by the agency. If the agency's position is that all signatures on a form must be CPAS signatures in order for the form to be accepted, we encourage clarifying language on this point within the EM.
- 3) We urge the agency to add to the list of forms that are currently accepted under CPAS. We also recommend memorializing this EM in the POMS for agency-staff clarity.

We are encouraged by the progress made thus far, and we urge the agency to continue improving digital access for claimants, third party assistors, and the agency.

## **Section II**

Section II of Docket No: SSA-2025-0012 is a reproduction of Docket ID Number SSA-2025-0003. We (and many other organizations) submitted comments in

response to Docket ID Number SSA-2025-0003 in April of 2025. We hope that you will consider those previously submitted comments as they pertain to this new Collection Activity. For ease of reference, NOSSCR's relevant comments are reproduced below:

*Request for Reconsideration—Disability Cessation*

In addition to the contemplated revisions, we urge the agency to add an option to elect Statutory Benefit Continuation (SBC) directly on the SSA-789 Request for Reconsideration—Disability Cessation form. Currently, if an individual elects SBC they must also submit Form SSA-795, Statement of Claimant or other person. This additional form increases the agency's and the respondent's burden.

The Statutory Benefit Continuation election process could be improved in the following ways, further reducing the agency's burden, providing clarity to the respondent, and streamlining the disability cessation appeal process:

- 1) Add the SBC election option to Form SSA-789;
- 2) Bring Form SSA-789 (with the SBC election option) online;
- 3) Add the SBC election language directly to the medical cessation appeal form;
- 4) Increase the allowed SBC election timeframe from 10 days to 60 days, allowing for SBC election during the entire appeal window.

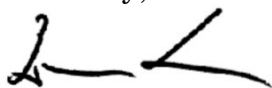
*Social Security Administration Health IT Partner Program Assessment—  
Participating Facilities and Available Content Form*

0960-0798

We appreciate the agency's ongoing commitment to improving health information technology. We encourage the agency to continue to incentivize health partner participation through public encouragement and commendation, and by releasing the data on comparative processing times where medical records were gathered exclusively using HIT versus claims where non-HIT development was required so that providers can see the real difference that their participation makes.

Thank you for the opportunity to comment and for your consideration.

Sincerely,



David Camp  
Chief Executive Officer and General Counsel