



Submitted via www.regulations.gov

Re: Agency Information Collection Activities: No. SSA-2025-0123

Dear Commissioner Bisignano:

These comments are submitted on behalf of the Social Security Task Force (SSTF) of the Consortium for Constituents with Disabilities (CCD). 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. Since 1972, CCD has advocated on behalf of people of all ages with physical and mental disabilities and their families.

Thank you for the opportunity to comment on this proposal.

I. SSA underestimates the burden related to the Continuing Disability Report

We appreciate SSA soliciting feedback on the claimant burden to complete the SSA-454 (forms or interviews). CCD-SSTF believes that SSA is underestimating the burden related to completing SSA-454, in all formats. In our experience, it takes individuals a long time to review the form, solicit help if needed, collect medical information, and complete the form—more than the 600 minutes estimated.

Even without considering the agency's underestimate of the completion burden of the SSA-454, we recommend that the agency expand the deadline for claimants to complete the SSA-454-BK. Currently, the agency only allows 10 days to complete this form.¹ Should the individual completing the paperwork require assistance from the agency, the agency estimates that the "average wait time in field office" is 23 minutes² and the average wait time for the teleservice center is 180 minutes.³ If you add those wait times to the estimated 600 minutes for form completion, this means that, just to complete Form SSA-454, a respondent is potentially dedicating more than 13 hours to the process.

¹ <https://secure.ssa.gov/poms.nsf/lnx/0900705350>

² We suggest this is an under-estimate as most field office visits require that the individual first wait on telephone hold to schedule an appointment, and then wait many days or weeks for an appointment to become available.

³ For this estimate, the agency notes that "this figure reflects the data posted on our public facing website (800 number performance | SSA);” however, unfortunately, that data is no longer available on SSA’s site. We encourage the agency to once again make this data public-facing as it is incredibly valuable for SSA’s customers to understand their potential wait times when assessing whether or not they have the capacity to hold.

Many individuals who are disabled or who live in rural areas are not able to check their mail daily. By the time an individual sees this notice, they may only have a couple of business days remaining to contact SSA for assistance. Many individuals with disabilities cannot sit, or write, or concentrate for multiple hours on any given day. Given the estimated 13 hours needed to complete this paperwork, we strongly urge the agency to allow for more than 10 days to respond.

II. SSA underestimates the burden related to the Security Authentication PIN (SAP)

In Response to SSA's New Emergency Request, SSA-2025-0014, the CCD SSTF submitted public comments, seeking to clarify the scope of the policy, and to highlight the significant burden this will have on many, which we believe SSA underestimated, <https://www.regulations.gov/comment/SSA-2025-0014-0008>. Now, CCD SSTF offers further comments because the agency has altered the original Emergency Request via a July 18, 2025 "Justification for Non-Substantive Changes" letter.

In the "Justification for Non-Substantive Changes" letter dated July 18, 2025, SSA indicates that "the agency has determined further need to expand the use of the SAP process for other telephone transactions. Specifically, SSA will use the SAP process for the following additional telephone services: 1) Generating a Benefit Verification Letter; 2) Obtaining a Tax Statement or replacement Form 1099; 3) Change of Address; 4) Request for Claims Status." The agency estimates that 3,455,360 respondents will decline to use SAP and will visit a field office for in-person identity proofing, equating \$58,138,131 in total annual opportunity cost. This is an immense and unnecessary burden that will significantly disadvantage those with limited internet and digital access, those that live in rural communities, and those who have transportation or mobility issues.

The agency has not produced data demonstrating that seeking a claim status, or updating an address, or requesting a benefit verification letter or tax statement have resulted in any significant fraud within Social Security's programs; and yet, they are requesting to move forward with this SAP process that *will* increase the backlog of cases, *will* increase phone and in-person wait times, and *will* bog down an already time-strapped agency workforce. We urge the agency to reconsider adding these additional categories to the SAP process. The burden is too high. We acknowledge that some outlets are reporting that SSA is contemplating making the SAP process optional for respondents,⁴ and, if proven accurate, the CCD SSTF supports this flexibility. We also want to flag that, since the date of the Emergency Request, additional agency policies have been proposed that will make the implementation of the SAP policy even more obstructive to the low-tech client population. Specifically, we are concerned by the agency's imminent move away from paper checks. SSA announced an intent to stop issuing paper checks beginning September 30, 2025.⁵ This shift is in-line with the President's Executive Order titled "Modernizing Payments To and From America's Bank Account," which is also effective

⁴ Natalie Alms, *In regulatory filings made earlier this month, SSA had estimated that the planned requirements would result in over three million office visits*, <https://www.nextgov.com/digital-government/2025/07/ssa-make-planned-id-checks-additional-phone-transactions-entirely-optional/407114/?oref=ng-homepage-river> (July 30, 2025).

⁵ <https://blog.ssa.gov/social-security-to-fully-transition-to-electronic-payments/>

September 30, 2025.⁶ Presuming SSA moves forward with stopping or limiting access to paper checks, all those recipients who are currently receiving or are set to receive paper checks, will be required to update SSA with banking information, which will now be much harder to accomplish due to the newly implemented SAP policy.⁷

The same customer base that struggles with electronic banking will likely struggle with the SAP policy, which requires them to have and be able to use an electronic mySSA.gov account in order to provide a technician with a six-digit PIN. The combination of these policies is burdensome—both to those the agency is tasked with serving, and to the employees seeking to serve. We are concerned that in many cases the combination of these policies will obstruct low-tech beneficiaries from receiving their benefits: they can no longer receive paper checks and will be unable to undergo the steps needed to update SSA with new banking information.

Moreover, by eliminating paper checks, SSA is going to drive almost half a million people to SSA to try to update their account information. Because many of the people who cannot or will not use electronic banking will also lack a mySSA account, most of these individuals will have to go to an SSA Field Office in person to update SSA with their new bank account information. In the best case scenario, this will cause an increased workload burden for the agency and the beneficiary. In the worst case scenario, beneficiaries will not receive their benefits, and the agency will fail its mission of “providing financial protection for our nation’s people.”

CCD SSTF is particularly concerned because SSA’s SAP policy does not contemplate a low tech option for individuals who struggle to get to a field office for in-person service. As noted in our prior comments, SSA should create a low-tech pathway for beneficiaries seeking to change banking information over the phone.

Subsequent to the issuance of this NPRM, SSA indicated that it had removed the SAP PIN policy and made it optional; though reporting indicates that internal policies instruct employees to seek out the SAP PIN if callers want to change their direct deposit information. CCD SSTF applauds SSA flexibility at responding to feedback about the onerous nature of this plan, and requests that SSA update internal guidance to reflect the withdrawal of this plan.

III. SSA underestimates the burden for the enterprise scheduling system (ESS) and National Appointment and Scheduling Calendar (NASC)

First, the CCD SSTF wants to acknowledge that we applaud the agency’s move to expand electronic appointment scheduling options. While we continue to advocate for increased availability of walk-in appointments at field offices, expanding the portfolio of appointments that

⁶<https://www.whitehouse.gov/presidential-actions/2025/03/modernizing-payments-to-and-from-americas-bank-account/>

⁷ Some media reporting suggests that SSA may be retracting from its statement requiring claimants to use electronic banking. The CCD SSTF strongly supports SSA continuing to issue paper checks. In the least, the agency should consider allowing paper checks for the beneficiary’s first benefit check as many banks require minimum funds to open accounts, and many beneficiaries rely on that first check to open accounts—an impossibility if they never receive a paper check. The CCD SSTF also encourages SSA to keep paper checks as an option for claimants who need or prefer them. Although we agree that electronic banking is beneficial, many claimants have impairments (often cognitive or behavioral) that make using electronic banking very challenging.

can be scheduled online is welcome. We encourage the agency to continue this expansion until all appointment types can easily be scheduled via digital self-service (while ensuring that non-digital pathways for scheduling remain intact for those unable to access the needed digital scheduling tools).

However, we once again want to flag that the agency is underestimating the burden. In the burden calculation for the ESS, the agency averaged “the average FY 2025 wait times for field offices (23 minutes) and teleservice centers (180 minutes), based on SSA’s current management information data” and found that the “average wait time for teleservice centers is 102 minutes.” First, if the data point is the average wait time for teleservice centers, we do not understand why the previously used figure for “the average wait times for teleservice centers” (180 minutes) was averaged with the wait times for field offices (23 minutes) instead of just using the average wait times for teleservice centers (180 minutes).

In this same collection activity, when estimating the burden for Form SSA-454-BK completion, the agency indicated that the 23 minute figure was a wait time “*in* field office,” not on hold for a field office. There is an important distinction between the two.

Given that the low-tech population may be unable to successfully navigate the mySSA account creation and login required to complete the multi-step ESS process, and given that the telephone wait time on hold, just to make an appointment, is frequently more than 2 hours, we strongly encourage the agency to consider 1) providing a simplified digital scheduling option that does not require account login, and 2) reopening field offices for in-person walk-in visits.

CCD SSTF appreciates SSA creating more pathways to efficiently communicate with SSA, including ESS and the SAP process. While we agree that use of online tools can be helpful for many, it is extremely important that SSA maintain multiple pathways so that those who are not digitally proficient will not be excluded from service. SSA’s customer service base, by design, includes millions of people with disabilities, some of which make it challenging to use or comprehend electronic or online systems, as well as an aging retirement population who may not have the knowledge, skills, or technology to navigate the complex systems that are being proposed. While we support and applaud improved digital efficiencies, we implore the agency to simultaneously protect and strengthen non-digital access points. Re-open field offices for walk-in visits. Establish a dedicated phone line exclusively for appointment scheduling. Continue to assist claimants and beneficiaries both in-person and over-the-phone after successful identity proofing that does not require complex digital logins. The CCD SSTF stands ready to work with SSA to ensure that everyone, regardless of ability, has meaningful access to the agency’s promised “superior customer service.”

Respectfully,

CCD-SSTF Co-chairs

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