

August 20, 2025

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

Re: Docket No: SSA-2025-0123

Dear Commissioner Bisignano:

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 appreciate the opportunity to comment on these proposed changes.

Section I, Subpart 1: Continuing Disability Review Report

We applaud the agency's increased estimation for the time burden required to complete Form SSA-454. While we believe the form is likely to take many respondents more than the estimated 600 minutes to complete, this number is a far more accurate burden estimate than prior iterations, and we are encouraged by the agency's move to adequately reflect the respondent's burden.

We ask that the agency consider increasing the number of days allowed for completion of this form. Currently, the agency only allows 10 days to complete this form.¹ Given the estimated burden for form completion, we encourage the agency to increase the number of days allowed for a response.

Section I, Subpart 5: mySocialSecurity—Security Authentication PIN

We acknowledge that the agency submitted an Addendum to the Supporting Statement for this Collection Request on August 1, 2025. Within the addendum, the agency altered "the overall use of the SAP to include only direct deposit changes." We are encouraged by this change. Based on SSA's own estimates, the originally proposed expansion of the SAP would have equated \$58,138,131 in total annual

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

opportunity cost. Beyond the monetary burden, the originally proposed changes would have significantly disadvantaged those with limited internet and digital access, those that live in rural communities, and those who have transportation or mobility issues. We are pleased to see that the agency decided to limit the use of SAP to direct deposit only, and we encourage the agency to retain this limitation.

Nevertheless, we remain concerned about the enactment of the direct deposit SAP policy coinciding with the agency's transition away from paper checks. SSA announced an intent to stop issuing paper checks beginning September 30, 2025,² in accord with the President's Executive Order titled "Modernizing Payments To and From America's Bank Account," which is also effective September 30, 2025.³ 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 direct deposit information, which will now be much harder to accomplish due to the newly implemented SAP policy.

The same customer base that has previously resisted direct deposit likely largely overlaps with those who will struggle with the SAP policy, due to lacking digital literacy. We are concerned that a certain sector of beneficiaries will be unaware of the need to make these changes, will be unable to successfully navigate the needed SAP, or will have to wait additional time before completing the required changes at an in-person field office visit. As such, we urge the agency to enable a grace period for those who need additional time to successfully update their direct deposit information. We also encourage the agency to consider allowing a paper check for the first benefit payment so that beneficiaries without bank accounts will be able to meet the minimum monetary threshold required to open a bank account, thereby enabling them to set up direct deposit thereafter.

Section II, Subpart 2: Enterprise Scheduling System (ESS) and National Appointment and Scheduling Calendar (NASC)

NOSSCR applauds 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 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).

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,

² <https://blog.ssa.gov/social-security-to-fully-transition-to-electronic-payments/>

³ <https://www.whitehouse.gov/presidential-actions/2025/03/modernizing-payments-to-and-from-americas-bank-account/>

and given significant telephone wait times to schedule appointments, we strongly encourage the agency to consider 1) providing a simplified digital scheduling option that does not require account login; 2) reopening field offices for in-person walk-in visits; and 3) offering a dedicated phone line for prompt appointment scheduling.

We are encouraged by the agency's move to create additional pathways to efficiently communicate with SSA, including ESS and the SAP process. While these digital advancements are welcome and necessary, we also ask that the agency be mindful of the customer base it serves: largely elderly and disabled individuals who may lack anticipated digital fluencies.

NOSSCR is proud to partner with the agency as we navigate toward a more efficient future.

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Camp', with a stylized flourish at the end.

David Camp
Chief Executive Officer & General Counsel