



August 29, 2025

The Honorable Frank Bisignano
Commissioner
Social Security Administration
6401 Security Blvd.
Baltimore, MD 21235

Submitted via www.regulations.gov

Re: NADR Comments on SSA-2025-0123

Dear Commissioner Bisignano

The National Association of Disability Representatives (NADR) is pleased to submit comments in response to the ***Agency Information Collection Activities: Proposed Request and Comment Request***. NADR supports the Social Security Administration (SSA) efforts to maintain program integrity and ensure the ongoing eligibility of beneficiaries.

NADR Background

NADR advocates on behalf of more than 700 attorney and non-attorney representatives nationwide who assist individuals with Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) claims. Our members work on the front lines of the disability adjudication process, ensuring that claimants, many of whom are among the most vulnerable in our communities, receive fair access to the benefits they have earned and deserve.

NADR Comments on Select Provisions

NADR looks forward to working with SSA as it develops sub-regulatory policies in regard to the proposed rule. Toward that end, we note the following:

I. THE NECESSITY AND UTILITY OF INFORMATION COLLECTION

We recognize the importance of Continuing Disability Reviews (CDRs) in maintaining program accuracy and ensuring that benefits are provided only to those who remain eligible. However, the information gathered must be directly and practically related to the eligibility determination. NADR urges SSA to continually assess whether each piece of requested information is necessary in order to prevent undue burden, especially for individuals experiencing significant health, cognitive, or functional limitations.

II. ADMINISTRATIVE BURDEN AND PROCEDURAL SIMPLICITY

Disability claimants are, by definition, individuals who may be especially vulnerable to administrative complexity. The CDR paperwork, though essential, can present significant procedural hurdles, particularly for those with mental, cognitive, or sensory disabilities. We respectfully urge SSA to streamline existing paperwork, remove repetitive or duplicative questions, and examine every step in the process to ensure it serves a clear administrative need.

Drawing on our association's long-standing position, we especially recommend:

- Collecting only the information necessary at each review stage, minimizing repeated requests for information that may already be in the SSA's records.
- Granting representatives access to the claimant's "my Social Security account" to assist with CDRs and related matters.
- Providing clear, plain-language instructions and definitions in all forms and communications.
- Giving claimants reasonable and flexible deadlines for submission, with extensions and support available for those who request it.

III. ENSURING ACCESSIBILITY AND ACCOMMODATION

SSA must prioritize making all forms and notices accessible in accordance with federal law and best practice. To that end, we urge:

- All versions of the SSA-454, including the i454, are offered in multiple accessible formats such as large print, screen-reader compatible files, and other alternatives.
- The CDR process includes clear, plain-language instructions for requesting accommodations.
- Claimants and their representatives always have the option to submit forms via online tools, mail, fax, telephone, or in person.

IV. REPRESENTATIVE ACCESS AND AUTHORITY

Representatives play a crucial role in assisting disability claimants. To ensure an effective CDR process:

- Representatives must be granted full and early access to necessary documentation and the claimant's record in Electronic Record Express (ERE) and "my Social Security account" platforms for CDRs and related matters.
- Granting representatives access to the claimant's "my Social Security account" to assist with CDRs and related matters.
- The SSA should clarify that claimants have the right to designate and work closely with their representative at every step, including the submission of electronic documents.
- All notices and requests should be issued simultaneously to both claimants and their appointed representatives to avoid delays or miscommunication.

V. TECHNOLOGY AND MODERNIZATION WITH PRESERVED FLEXIBILITY

NADR supports efforts to modernize SSA processes, including promoting secure electronic forms (i454) and digital access to records and notices. However, technology should not substitute traditional channels in ways that disadvantage claimants lacking access, skills, or comfort with digital tools. We therefore recommend:

- Maintaining the availability and equal validity of paper, telephone, and in-person CDR processes.
- Allowing e-signatures and faxed forms to reduce paperwork-related burdens, as "wet" signatures can be a barrier for those with mobility or transportation limitations.

VI. DATA SECURITY AND PRIVACY

Given the highly sensitive nature of information requested during CDRs, including medical and financial records, NADR emphasizes the need for strong and transparent security protocols. Claimants and their representatives must be reassured that all personal information will remain confidential and protected against unauthorized access. Additionally, SSA should allow claimants to request the removal or deletion of specific records or documents from their files. Representatives must also be able to securely access necessary records to provide effective support, while ensuring that privacy and consent standards are consistently upheld.

Conclusion

NADR appreciates the Social Security Administration's continued commitment to program integrity and equitable service delivery. As SSA moves forward with this important information

collection effort, we urge the agency to carefully consider how each requirement impacts the people behind every claim. These are individuals who are often managing serious health challenges, limited resources, and complex life circumstances.

We are grateful for the opportunity to share our perspective. NADR stands ready to collaborate with SSA leadership and staff to advance thoughtful, claimant-centered improvements. Thank you for your stewardship of this vital national program and for your consideration of NADR's recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Christopher M. Mazzulli".

Christopher Mazzulli

President

National Association of Disability Representatives (NADR)