
From: Larson, Larry [llarson@ahip.org]
Sent: Friday, September 07, 2007 2:37 PM
To: FN-OMB-OIRA-Submission
Subject: 72 Fed. Reg. 45079
Attachments: SSA_response_09 07 2007.pdf

Office of Management and Budget
Attention: Desk Officer for SSA

We are submitting comments with regard to the Consent Based Social Security Number Verification Process. Comments are in the attached PDF file.

<<SSA_response_09 07 2007.pdf>>
Thank you.

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9/10/2007



September 7, 2007

Social Security Administration
DCBFM
Attn: Reports Clearance Officer
1333 Annex Building
6401 Security Boulevard
Baltimore, MD 21235

OPLM.RCO@ssa.gov

Office of Management and Budget
Attention: Desk Officer for SSA
OIRA_Submission@omb.eop.gov

Re: Information Collection Request Addressing the Consent Based Social Security
Number Verification Process

Dear Ms. Davidson:

I am writing on behalf of America's Health Insurance Plans (AHIP) in response to the comment request that was published in the *Federal Register* on August 10, 2007 (72 Fed. Reg. 45079). The *Federal Register* comment request solicited public input about a proposed automated Consent Based Social Security Number Verification process.

AHIP is the national trade association representing nearly 1,300 member companies providing health insurance coverage to more than 200 million Americans. AHIP's membership includes a majority of the nation's private disability income insurers.

As the *Federal Register* notice explains, the Social Security Administration (SSA) is planning for a second phase of the Consent Based Benefit Information System (CBBI), a fee-based web service system which will provide private industry and other third party requesters with Social Security disability and retirement benefit data. Development and implementation of the CBBI System is expected to:

- Greatly reduce the paperwork for both SSA and the private insurers;
- Provide timely coordination of private and public disability insurance; and
- Reduce overpayments of private disability income benefits.

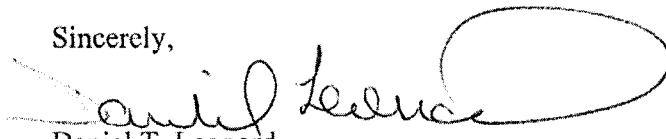
In addition, the CBBI may serve as a building block for more robust information sharing between insurers and the SSA.

AHIP's disability insurer members support electronic systems and processes which could improve the coordination of private and public disability income benefits. Since private disability income benefits are generally reduced by the amount of public disability income benefits, we support processes that can enable efficient and timely claims management and help facilitate improved consumer understanding of how disability benefits are coordinated between the public and private disability insurance sectors.

As you may be aware, AHIP has been working with SSA on a technology initiative that would help automate the process by which private disability insurers request and receive the SSDI benefit information necessary to coordinate private and public disability income benefits. We are pleased that this initiative fits within the stated objectives of the CBBI. AHIP and the disability insurance industry greatly appreciate all of SSA's efforts to advance the automation of an electronic information exchange to improve the coordination of private and public disability income benefits. AHIP and its disability insurer members stand ready to work with SSA to ensure that the CBBI and any other electronic system or solution meets these objectives.

We appreciate the opportunity to comment on these important issues. Please contact me at (202) 778-3231 or dleonard@ahip.org if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel T. Leonard", with a large, loopy flourish at the end.

Daniel T. Leonard
Executive Vice President
Advocacy & Professional Services