



SOCIAL SECURITY

The Commissioner

April 20, 2022

The Honorable Ron Wyden
Chair, Senate Committee on Finance
U.S. Senate
Washington, DC 20510

Dear Committee Chair Wyden:

Thank you for your January 25, 2022 letter regarding Social Security's service delivery. I share your concerns and want you to know that we are committed to improving our customer service.

To protect the safety of the public and our employees during the pandemic, we have provided online, telephone, and limited in-person services by appointment. I remain committed to ensuring everyone who is eligible for benefits receives them and to ensuring access to our services. I agree that we must increase in-person service, particularly for people who face barriers in accessing our online and telephone services, and we are looking forward to expanding our in-person appointments and reopening field offices to walk-in services on April 7, 2022.

As of January 19, 2022, we reached mutual agreements with all our unions on our reentry plan. We completed agency-wide reentry on March 30, 2022, allowing for expanded in-person service on April 7, 2022. This date allowed ample notice for our employees and to ensure safety measures are in place.

Even as we expand the availability of our in-person presence to improve service, we must also improve our National 800 Number. The phone lines are a critical communication channel for the public to access our services without the need to visit our offices. We are operating on outdated phone systems that have been in place for more than a decade. In addition, we have had to institute workarounds to operate remotely during the pandemic. We are in the process of transitioning to a modern telecommunications platform. Our Next Generation Telephony Project is replacing our three legacy telephone systems (800 Number, Field Offices, and Headquarters) with a single platform, and we expect the 800 Number to be updated first in FY 2023. We expect the single platform phone system to be more efficient than our current platforms, provide more self-service opportunities for the public, improve performance management, and reduce the time it takes to implement future process improvements.

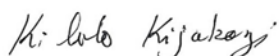
I appreciate your continued support for our employees and the public we serve. I am pleased, and frankly relieved, that our reentry remains on track because we need to improve service. I appreciate President Biden's State of the Union address, which reassures us that it is time to feel

safe returning to our offices and other activities. However, I must let you know that the fiscal year (FY) 2022 appropriation of \$13.3 billion is not sufficient to provide the level of service you and I expect, and the public deserves. SSA's funding has remained relatively flat for the previous four years, and the 2022 enacted level is nearly \$850 million short of the President's FY 2022 Budget, and less than we need even to cover basic inflationary costs. It will require us to delay needed hires, including teleservice center staff, and information technology improvements, and we will have less overtime available to help address a potential surge of people returning to our offices for in-person service.

As we reenter, I ask for your support to help us continue to direct people who are able to access us online or by telephone to try those options first before coming to our offices in person, especially without an appointment. This service channeling will be important, particularly in the early days of reentry, so that we can serve people in person who do not have other options.

Enclosed we provide responses to your specific questions. I hope this information is helpful. If you have further questions, please contact me, or your staff may contact Tom Klouda, our Deputy Commissioner for Legislation and Congressional Affairs, at (202) 358-6030. I am providing a similar response to the cosigners of your letter.

Sincerely,

Handwritten signature of Kilolo Kijakazi in cursive script.

Kilolo Kijakazi, Ph.D., M.S.W.
Acting Commissioner

Enclosure

- 1. How will you ensure people who need in-person assistance receive service? Is SSA tracking the number of requests for in-person appointments and what percentage of those requests have been granted; if so, what are the results and how do they vary across regions and field offices? What challenges does SSA face in providing face-to-face services and how will you overcome those challenges?**

We track appointments completed in our offices, rather than requests for appointments. Since October 1, 2021, we've seen nearly 1 million individuals in our field offices for critical need appointments. We are increasing onsite staffing and the availability of in-office appointments consistent with our Workplace Safety Plan.

As we expand our in-person services on April 7, 2022, we expect service demands to increase and our planning includes contingencies to meet public needs and utilizes our current workforce and nationwide network of local offices to support each other. We are also rehiring recent retirees to help us better serve the public.

- 2. As noted in SSA's COVID-19 Workplace Safety Plan, field office access is restricted to the public by appointment only "for critical services that [SSA] cannot handle remotely." However, SSA's procedures for an individual to secure an in-person appointment appears to favor those who have reliable telephone or Internet access, leaving out at-risk groups. What is SSA doing to ensuring equitable access to in-person appointments?**

We recognize that not everyone can do business with us online or by telephone and agree there is an urgency to restore walk in service, which is scheduled for April 7, 2022.

Throughout the pandemic, we have worked closely with advocates to strengthen access to our programs and services. For example, we implemented a Third-Party SSI Claims Taking Campaign for which we created a liaison position to work directly with advocacy organizations to assist with claims taking or to provide us with leads. Specifically, we established Vulnerable Population Liaisons (VPL) and Vulnerable Populations Experts (VPE) in our field offices. These employees work directly with community partners that have agreed to take and submit applications for SSI, provide information sufficient to establish a lead or protective filing, or refer potential applicants to us. To support this effort, we:

- designated 675 VPLs who receive completed applications as part of their regular workload. They also identify potential errors and review with the submitter or refer recurring issues to local management and Public Affairs Specialists (PAS) or Area Work Incentives Coordinators (AWIC) who provide additional discussion or training for the organization.
- designated 100 VPEs is to coordinate the campaign at a broad level by providing technical guidance and support to the VPLs. The VPEs also perform quality

control reviews and offer training to the organizations in coordination with the PASs and AWICs.

- directed our Regional Communications Directors to serve as ombudsmen to address complex or unresolved issues raised by our community-based partners.

Please see our [Outreach Materials for People Facing Barriers](#) web page for additional information.

- 3. The recent Washington Post article reported that one field office limited drop box hours to just one hour per day. Are such limited hours for drop boxes a common practice at field offices and, if so, what steps are being taken to increase available hours in those field offices? Further, individuals who need to drop off original documents at SSA have to call the field office to find out the office's drop box hours. Are there plans to publish field offices' drop box hours online or on its automated messaging system so individuals do not have to wait on hold to find out a relatively simple request, and SSA does not have to divert resources to respond to each call?**

We are expanding both the number of offices with drop boxes and the hours those drop boxes are available to generally align with the local office's hours. We have drop boxes at the majority of our field sites. However, our offices are in a variety of settings, which affects our ability to use drop boxes in some locations. Factors affecting the use of drop boxes include building access, historic site preservation requirements, multi-tenant occupancy, which may not allow for the use of drop boxes due to shared physical space, and security considerations.

As we approach reentry and expand in-person services in our field offices, we will assess how drop boxes fit into our future business model. For example, we may find the use of express interviews for the submission of documents to be a more efficient and positive customer experience, rather than leaving documents in a drop box to be returned by mail.

- 4. How is SSA reducing the need for hands-on review of documents (e.g., driver's licenses, immigration documents, birth certificates, and passports), such as adding features to my Social Security and data sharing with other state and federal agencies?**

We established paperless workarounds like accepting electronic signatures, creating electronic forms, and expanding our online services. In support of [EO 14058](#), we are reviewing our policies and forms inventory to find opportunities to eliminate physical signature requirements and identify documents that our customers can submit to us electronically.

We are pursuing additional data exchange opportunities, which could reduce the need for us to review physical documents. For example, we are working to expand our online replacement SSN card application to the remaining four states, and we are working to leverage other data systems that include vital statistics information like proof of marriage.

5. SSDI and SSI benefit applications dipped substantially during the pandemic. State Disability Determination Services received nearly 16 percent fewer SSDI and SSI initial claims during the COVID-19 pandemic than the prior year. What new efforts are SSA using to increase outreach to eligible groups, including homeless individuals, seniors, children with disabilities, and adults with disabilities?

Our vision is to provide income security for the diverse populations we serve, including those in underserved communities, people with disabilities, workers, and their families, and our intent is to serve all who seek access to our programs. We are committing through a new Agency Priority Goal to improve equity in our SSI program through increased outreach and improved benefit delivery, including to communities of color and underserved communities, by increasing the number of all SSI applications by 15 percent, restoring rates closer to pre-pandemic levels, and increasing the number of SSI applications from underserved communities by 25 percent, both relative to a 2021 baseline.

We continue to raise awareness of our benefit programs through targeted outreach, media campaigns, updates to our website, new products, and data sharing.

Targeted Outreach

- In FY 2021, we initiated the Special Mailer project¹ for Title II beneficiaries 18 and older, whose monthly benefits are less than the maximum Federal SSI benefit. The mailer encouraged these beneficiaries to apply for SSI. To date, we have mailed approximately 665,000 notices, resulting in over 42,000 applications. We approved more than 18,000 individuals for additional benefits averaging \$216 per month, for a total of nearly \$4 million SSI benefits paid. We expect to release an additional 735,000 mailers to potential beneficiaries in 2022.

Media Campaigns

- In FY 2021, we implemented a paid social media campaign in English and Spanish to promote SSI for both children and general audiences. As of January 28, 2022, ads promoting SSI have generated over 207 million impressions² and over 2.1 million visits to our website.
- In June 2021, we began airing our television and radio public service announcement (PSA), “The Life of a Child,” in English and Spanish. The PSAs target parents and caregivers of children with disabilities to increase awareness and applications for SSI. To date, the PSAs have generated over 59 million total impressions.³

¹ We released notices in English and Spanish and include a dedicated 800# hotline to address inquires and assist potential applicants in determining their eligibility for SSI benefits.

² This refers to the number of times our ads displayed on screen to be seen and clicked.

³ This refers to the number of times the PSAs could be watched or heard.

Updates to our Website

- In FY 2021, we redesigned the SSI benefits portal to make it easier for customers to understand the SSI program.

New Products

- In October 2021, we released our redesigned *Social Security Statement* to make it easier for people to see their earnings information and estimates of future benefits. We added fact sheets, tailored to a person’s age and earnings history. Based on stakeholder feedback, we are planning to develop a new fact sheet entitled, “Supplemental Security Income And Other Benefits – Information For People With Limited Earnings Fact Sheet.”
- On March 19, 2022, we implemented an online service option that will allow potential applicants, and third parties who assist them, to express their intent to file for SSI and other benefits online, and establish a protective filing date.

- 6. At the Finance Committee hearing, Members and witnesses noted the length and the complexity of the SSI application, stretching over 30 pages. At the request of Chairman Wyden, SSA submitted a plan to simplify the SSI application process and make it accessible. Please provide an update on SSA’s progress on simplifying the application and creating an online version of it (or an online option to express intent to file and protect the filing date).**

We implemented an online protective filing tool on March 19, 2022, and we continue to work with stakeholder organizations to simplify the SSI application process and expand online SSI service delivery.

We are exploring ways to simplify the SSI application process by capturing basic eligibility online, followed by technician support for further development. We will also consult research and usability testing to improve the customer experience as we develop this approach.

However, most of the complexity of the SSI program is based in statute and, as outlined in the SSI Simplification Plan you referenced, we are pursuing administrative simplifications. Specifically:

- *Rules Regarding In-Kind Support and Maintenance (ISM)* -- We are currently developing a [Notice of Proposed Rulemaking](#) that would eliminate the consideration of food expenses as a source of ISM. In October 2021, we increased the tolerance⁴ from \$5 to \$20 for determining whether a sharing arrangement exists when an individual is living in another person’s household.

⁴ We will automatically apply the \$20 tolerance for all newly reported living arrangement changes. However, we will verify living arrangements for approximately 1,800 active SSI cases during the SSI redetermination process.

With this change, an individual's SSI benefit is not reduced if their contribution is within \$20 of the pro rata share of the household's expenses.

- *Streamline Process for Temporarily Institutionalized (TI) Individuals* -- We are finalizing necessary actions to implement a new form SSA-186 Temporary Institutionalization Statement to Maintain Household and Physician Certification, to standardize the process for obtaining benefit continuation during periods of temporary institutionalization for SSI recipients. We are targeting use of this new form by the end of FY 2022. We also plan to develop a demonstration project to assess the effect of automatically providing these temporary benefits in the first 90 days without requiring the person to demonstrate their need to maintain household expenses or provide the physician's certification.

7. We are deeply concerned about the large and growing backlog of cases at the initial and reconsideration levels pending at state agencies, and increased delays in applications and appeals being sent from field offices and Workload Support Units to state agencies. What are SSA's plans to ensure timely and accurate decisions are provided to disability claimants?

We acknowledge the increase in these workloads due to pandemic-related challenges and higher attrition among the State Disability Determination Services (DDSs). We are taking steps to coordinate with the States and improve our processes. For example, we:

- Increased Consultative Examination (CE) availability, including expanding the use of telehealth (virtual) CEs and the recruitment of additional CE providers;
- Supplied the DDSs with policy and procedural reminders, and guides for improved case processing;
- Updated and implemented training for both new and experienced staff to ensure consistent, quality determinations aligned with the Disability Case Processing System (DCPS2) national transition;
- Issued additional guidance to assist adjudicators in processing cases more efficiently; and
- Released more forms online such as the SSA-1696 *Appointment of Representative*, SSA-820/SSA-821 *Work Activity Report(s)* and SSA-455 *Disability Update Report*.

We are transitioning the modernized DCPS2 to all DDSs by the end of FY 2022, and to all Federal Units thereafter. Additionally, we are prioritizing our oldest cases first.

8. Is SSA tracking the time to effectuate disability decisions (from favorable decision until retroactive and continuing benefits are provided to claimants)? If so, what trends have you witnessed in recent years, what types of cases are the most challenging to effectuate, and what goals do you have for improving the effectuation process? If not, why, and does SSA have any plans to study this metric?

Yes, we track disability claims through each step of the clearance process.

Cases that are the most challenging to effectuate include those involving:

- Both SSDI and SSI that require complex manual offset computations like Workers' Compensation;
- Multiple Appointed Representatives;
- Non-standard fee arrangements (e.g., Appointed Representative fee petition cases);
- Work after the application date or disability onset date; and
- Third party claims.

The underlying policies for adjudicating these types of cases are complex and, as a result, often require partial automation and manual work.

The pandemic has also extended the time to effectuate disability claims by around 5 percent. Pandemic-related delays have contributed to extended processing time, such as mail delays, workarounds to make incoming forms and evidence portable, difficulty obtaining medical and school evidence, and challenges in reaching claimants by phone.

To address these challenges, we are implementing hiring, retention, and training strategies. We are also pursuing several long-term automation solutions to reduce the number of cases requiring paper and manual processing. For example, later this year, we expect to implement an enhancement that allows most Expedited Reinstatement cases to be handled electronically. After this year, we will expand online services for Appointed Representatives through our IT Modernization efforts.

9. Advocacy groups, non-profit organizations, and claimant representatives are a valuable resource to communicate policy and process changes, as well as provide a “front line” perspective to help develop strategies to improve customer service. What is SSA doing to keep them apprised of policy or process changes? How is SSA leveraging their knowledge and expertise to improve service?

We recognize the value of the perspective and expertise of these stakeholders, and we increased our engagement during the pandemic. For example, we:

- established two advocate-executive workgroups, the *Workgroup on COVID-19 Emergency Response and Service Delivery Outreach* and the *Workgroup on SSI/SSDI Administrative Simplifications and Evidence-Based Outreach*, to reach out to people facing barriers. Participants include SSA executives and a diverse group of advocates with varying missions and from numerous geographic locations who assist our applicants and beneficiaries. These relationships strengthen our outreach efforts to connect individuals to our programs and communicate⁵ important information about our services. We receive valuable

⁵ In addition to communicating within the workgroup, based on stakeholder feedback, we maintain timely information on our dedicated [Coronavirus Disease \(COVID-19\)](#) and [What's New](#) web pages. We added an email subscription option to inform subscribers when we publish updates to these sites as well as to our [Program Operations Manual System](#), [Emergency Messages](#), and [Chief Judge Bulletins](#).

feedback from these organizations, which helps us to streamline our policies and procedures, and implement effective solutions like the redesigned *Social Security Statement* and the new online tool to express interest in SSI and other benefits.

- regularly release Dear Colleague Letters to share information and materials about specific agency programs and initiatives. Since March 2021, we released 67 letters to advocates, organizations, and representatives on relevant topics such as COVID-19 and service delivery options, people facing barriers, Economic Impact Payments, and Social Security scam warnings.
- publish guest articles on our *Social Security Matters* blog, which highlight the knowledge and expertise of these groups and cover various topics such as [people facing homelessness](#) and [children with disabilities](#).
- present the [National Disability Forum](#)⁶ (NDF), which serves to engage stakeholders including advocates and the public on issues related to our disability programs early in the policy development process. Through this forum, we obtain unique insights, which helps us to develop responsive and efficient policies.

10. Under the previous Administration, SSA implemented Executive Orders to reduce the influence of employee unions and labor-management relations suffered. What steps have you taken to restore the relationship between the agency and the unions? What efforts have you made to work with the unions to return employees to the office?

Through compliance, compromise, and civility, we are committed to ensuring positive relations with all three SSA unions. Using this approach, we have reached numerous midterm collective bargaining agreements in the past year, after reaching no agreements with labor in 2020. We are in compliance with [EO 14003](#), after promptly implementing all of its requirements. Specifically, we:

- began renegotiating collective bargaining agreements with two of our labor unions and are in discussions to do so with our third union.
- have been renegotiating a collective bargaining agreement with the Association of Administrative Law Judges since August 2021.
- reached an agreement with the National Treasury Employees Union (NTEU) to renegotiate parts of its collective bargaining agreement, fully satisfying its obligations under EO 14003 for that union. We began renegotiating portions of the NTEU collective bargaining agreement on March 7, 2022.

⁶ We generally present three NDFs annually. During the pandemic, we held two NDFs about COVID that addressed long-term effects and the mental health impact and one entitled “Equity in SSA Programs: Hidden Barriers”. The latest NDF, held February 17, 2022, was entitled “Equitable Access to SSA Disability Programs for LGBTQIA+ Communities” and was based on [EO 13988](#).

- engaged the American Federation of Government Employees (AFGE) regarding renegotiating parts of its collective bargaining agreement.
- voluntarily increased the amount of paid time union officials may spend on representational activities (official time) for both AFGE and NTEU in 2021 and 2022.
- are actively engaged with all three unions on issues related to workplace safety and reentry. Notably, as of January 19, 2022, we reached mutual agreements with all three of the unions concerning our reentry plan.