



May 9, 2025

Frank Bisignano
Commissioner
Social Security Administration
6401 Security Boulevard

Tasha Harley
Acting Reports Clearance Officer
Social Security Administration

Submitted via www.regulations.gov

Re: Agency Information Collection Activities: New Emergency Request No. SSA-2025-0014

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.

We respectfully recommend that SSA clarify the scope of its identity verification proposal. Based on news reports of an internal SSA memo on March 13, 2025, we learned that SSA was considering a policy to require additional identity verification for people filing claims over the phone, and for those unable to complete the process, they would have to go in person to verify their identity at Field Offices. SSA estimated this would drive 75,000 to 85,000 people a week to SSA Field Offices to undergo identity verification.¹ Then we learned, also through news reports, that SSA was abandoning their first plan, and would only require identity verification when trying to change direct deposit banking information.

Subsequently, SSA released the above-described Emergency Request to implement a Security Authentication PIN (SAP), requiring people to navigate and provide SSA claims representatives a 6-digit pin, generated in their MySSA accounts, when customers make “payment method changes during phone interactions.” SSA indicated this would apply to phone interactions when someone needed to make “post-entitlement/post-eligibility direct deposit changes, and certain claims which SSA flags as anomalous.” Later on, the notice suggests a claims representative may ask for a SAP in a broader set of circumstances including for “new initial claims taken over

¹ <https://www.washingtonpost.com/politics/2025/03/17/social-security-changes-phone-claims-doge/>

the phone or filed online and flagged as anomalous, as well as for post-entitlement/post-eligibility actions, or for direct deposit enrollments.”

The Agency’s subsequent supporting documents to OMB appear to have narrowed the scope of the SAP policy to apply only to verify the identity of telephone or in-person respondents requesting changes to their direct deposit information. SSA has not, however, updated the Federal Register notice to reflect this change. It would be helpful if SSA could clarify whether this policy could still apply, under any circumstances, to people applying for Social Security benefits. Because we are unclear on the scope of the policy, our comments include all purposes outlined in the Federal Register notice.

Thank you for the opportunity to comment on this proposal.

I. SSA’s Hybrid Process Essentially Ends Phone Service for Some Processes and This Proposal Significantly Underestimates the Burden on Claimants.

We are concerned that the new hybrid Security Authentication PIN (SAP) program will impose an unreasonable burden on claimants who need to solicit SSA’s services, in particular older adults, widows, orphans, and people with disabilities, including but not limited to those who are Deaf or hard of hearing and non-speaking people with intellectual and developmental disabilities (IDD), who face barriers using the telephone, accessing technology, and/or face obstacles traveling to a field office because of their age, disability, geography, poverty or other circumstances.

- 8 minutes is an underestimate of how long it will take to respond with an SAP

SSA estimates it will take an average of 8 minutes for most to learn about the SAP process from a claimant representative when they are trying to do business with SSA over the phone or in person, receive and understand instructions, gather the data and documents needed, answer the questions required and schedule any follow up. Moreover, SSA estimates that the wait time for this interaction will be only 14 minutes. It will be far more time-intensive even for tech-savvy members of the public.

Based on SSA’s own current public data, this proposal significantly underestimates the overall wait time to connect with someone at SSA and generate an SAP. As of April 25, 2025, SSA data shows the average call wait time is 1 hour and 30 minutes. Moreover, nearly 1 in 3 callers get a pre-recorded message that the lines are too busy, or have their call disconnected after they have already waited on hold for about 15 minutes. Some customers ask for a call back and usually wait more than two hours. While waiting for a call back may be more convenient than waiting on the line, for many, the time they are waiting for a call back is still time they are avoiding other tasks and waiting for outreach from SSA. Thus, SSA’s estimate that the wait time will be 14 minutes is a vast underestimate, inconsistent with their own data.

We appreciate that SSA has taken steps to ease the burden of generating these PINS by promising to offer vanity URLs to help customers navigate directly to the Securities Settings page within their MySSA Account. These vanity links may be useful to the small subset of SSA’s customer base who both have MySSA accounts and the ability to navigate those accounts,

as well as whatever process SSA uses to send that link. Even with those accounts, it is unlikely that 8 minutes is sufficient to communicate these rules, then find tech (phone or computer) to access the vanity URL, follow it, collect the data and respond. The ability to do this requires having access to tech and internet, the ability to receive the link from SSA, the ability to see and/or hear text on the screen, the hand dexterity to follow the link, and generate the SAP. As noted below, if SSA implements this policy, we would recommend that SSA engage in disability-inclusive user testing to assess the actual impact of this process before it is rolled out.

- SAP Process Will Significantly Burden Claimants without MySSA Account and/or Low-Tech Literacy.

In our experience, it is the people who lack access to technology or internet or have low tech literacy that choose to do business with SSA over the phone. Eight minutes is a significant underestimate for members of the public to generate an SAP who do not have MySSA accounts, and/or the ability to skillfully use them.

In SSA's Statement for Emergency Paperwork Reduction Act Approval For: my Social Security–Security Authentication PIN (SAP), OMB No. 0960, SSA explains that while the burden estimate of creating or logging into a my Social Security account is described under another OMB control number, this approval is meant to be “inclusive of the increased burden associated with either (1) generating an SAP through my Social Security to complete the direct deposit transaction over the phone; or (2) traveling to the field office because the respondent is unable to create a my Social Security account or otherwise unable to generate an SAP.”

For people who have limited access to tech or low-tech literacy, it will take them far more than 8 minutes to generate an SAP. If they cannot, SSA estimates that they will face a burden of 2 minutes. What is this for?

While it may only take 2 minutes for an agent to figure out if someone does not have an account, that is not a complete estimate of the burden this proposal would impose on people needing SSA's services. If someone is told to create an account and call back, even excluding the time it takes to create an account, this notice does not seem to contemplate it taking any time for that claimant to reconnect with a claims representative. This will likely take hours, not minutes, based on SSA's own data regarding phone service. Accordingly, this is an underestimate.

Absent the ability or willingness to use an SAP, this policy requires claimants to undergo identity verification in person. We commend SSA for maintaining an in-person option for identity verification. However, going to SSA in person is time-intensive and will take much longer than the 2 minutes this proposal estimates. It may also be virtually impossible for those with mobility issues and/or live far from a Field Office, as detailed below.

- SSA's Requirement for In-person Verification for Anomalous Claims is Very Burdensome and that Burden is Not Addressed in this Notice

In its Addendum to Support Statement, SSA notes that this SAP policy will not apply to anomalous claims. Instead, any claim flagged as anomalous will be required to go to SSA and verify their identity in person. While we appreciate SSA maintaining an in-person identity verification option, it must be acknowledged that this is a very burdensome process for people needing SSA services. This policy is estimated to drive 2 million more in-person visits to Field

Offices.² Most in-person appointments require making an appointment, which can be very time-consuming, gathering the appropriate documents, and traveling to a Field Office and waiting for service. Center on Budget Priorities analysis shows that more than 6 million people live more than 45 minutes away from a Field Office. Each in-person visit will require more than 90 minutes in just travel time, and much more time when you consider the wait to meet with a representative. This process may be nearly impossible for those with significant mobility limitations or demanding personal commitments, such as existing medical appointments or family caregiving.

II. SSA Should Create More Pathways to Identity Verification to Minimize the Burden On Respondents.

We appreciate the opportunity to offer recommendations on ways to minimize the burden on respondents.

As written, SSA's policy creates a binary to access SSA services for those flagged for identity verification, which eliminates service for those members of the public who are only able to engage SSA over the phone. Pathway (1) is a phone/tech pathway: requiring claimants to have access to and the ability to navigate tech to talk to SSA representatives or Pathway (2) in person service, which also typically requires the ability to navigate a phone and wait on hold to secure an appointment and travel to an SSA Field Office in person. While we commend SSA for maintaining in-person services, as an option convenient for many, we are concerned about the elimination of phone-only service for individuals subject to the SAP policy. This was an important method of communicating with Social Security, particularly with limited access or ability to use technology and/or with mobility issues.

For SSA to meet the diverse needs of its customer population, including people with disabilities and the elderly who may struggle both with mobility and with accessing and navigating online tools, we recommend SSA also consider adding additional pathways for identity verification. NIST guidance recommends that if SSA is implementing new verification processes, SSA should offer as many pathways as feasible to ensure the greatest number of claimants can complete the verification steps. For example, has SSA considered offering an alternative option for identity verification that does not require the user to have access to and be able to use a computer or smartphone? NIST endorses sending six-digit confirmation codes through the mail for identity authentication, and this process is used in some state employment insurance programs. There are existing examples of this approach at the federal level, including for identity verification through Login.gov. Perhaps SSA could consider a similar option, which is low-tech but also does not require in-person appointments, for identity verification.

III. The SAP Proposal, As Written, Is Impractical.

We appreciate the opportunity to comment on the practical utility of this proposal and the need for more information. We share SSA's interest in reducing scams that particularly target older adults. This SAP proposal is not calibrated to meet that goal, or is a practical response to the low level of fraud related to these phone services.

²<https://www.cbpp.org/blog/nearly-2-million-more-people-will-need-to-visit-social-security-offices-under-revised-policy>

Why is this needed? In SSA's Supporting Statement for this policy, it only notes "[t]o mitigate fraud concerns" but does not elaborate. Acting SSA Commissioner Dudek acknowledged that direct deposit fraud is less than one-hundredth of 1% of SSA's transactions by reporting SSA "is losing over \$100 million a year in direct deposit fraud." While significant, the amount remains a very small percentage of SSA benefit payments. It also impacts a small portion of SSA's beneficiaries—last year, only 2,000 of the millions of people who receive SSA benefits. The SSA OIG also reports that SSA has already thwarted most of this fraud before any inappropriate payments are made. Considering SAP PINs are a large burden on many consumers, it is not clear that such a large burden is warranted related to fraud activity that impacts so few, nor even cost-effective, given the small percentage the fraud represents and the added time and cost to both employees and the public.

The Federal Register notice contemplates that the SAP PIN process could be applied to initial claims, even though it appears SSA has narrowed the use of this process. Requiring claimants to produce an SAP when they are applying for benefits is impractical. Is there any evidence of fraud during these processes? If so, it hasn't been provided. When someone initiates a claim at SSA, it often requires significant interaction between claimants and SSA, many of which include opportunities for SSA to further verify identity because people are reporting employment (which can be cross-referenced with payroll information), medical treatment (which can be cross-referenced with HITT). It is unclear whether asking consumers to provide an SAP PIN will prevent any fraud that would not have already been prevented through the normal course of business, but it will provide significant stress to consumers and delay for those who do not have MySSA accounts and will struggle to go to in-person appointments. Moreover, implicitly pushing more people to apply online, as this change would do, could actually increase fraud, since more fraud occurs online than over the phone or in a face-to-face meeting in a Field Office.

IV. More Information is Needed to Assess the Impact of SSA's SAP Policy.

We believe the questions below are important to answer to understand why SSA is implementing this policy and whether this policy is the appropriate strategy:

- SSA purports this will be a "powerful fraud prevention tool," but why?
 - What fraud is SSA trying to prevent?
 - SSA estimates that 42% of all direct deposit fraud occurs over the phone. How is the majority of direct deposit fraud conducted?
 - What steps is SSA taking to prevent the majority of direct deposit fraud?
- How will SSA assess the rollout and evaluate the cost and benefits of this change?
- What support will SSA provide to consumers who need help creating or accessing mySSA accounts? How will SSA tailor their support to the disabled community, such as those who are Deaf or hard of hearing and non-speaking people with intellectual and developmental disabilities (IDD)?
- How would the SAP policy apply to parents or caregivers who are helping to navigate Social Security benefits to survivors or children with severe disabilities?
 - Would parents be able to use their personal mySSA accounts to generate a SAP to make changes over the phone to their child's account?

- If a parent or caregiver is unable to navigate the SAP process, what would in-person verification look like? Would the child beneficiary be required to go in person?
- How will SSA address individuals who need to do in-person identity verification?
 - Will people needing to verify their identity need an appointment?
 - If an appointment is required, will SSA take steps to minimize the burden on claimants by, for example, instructing claims representatives to schedule appointments for those who need them in the same call as when they discover the need for the appointment due to inability to use the SAP process? If so, will SSA further instruct representatives to ask about any accommodations needed for that in-person appointment at that time? Will these ID-verification appointments be prioritized?
 - Will identity verification be an exception to the policy requiring appointments?
 - How many individuals will be impacted by the SAP policy?
- Has SSA assessed whether teleservice centers can handle increased call volume for people seeking to schedule field office appointments for identity verification?
- Has SSA assessed whether Field Offices can handle the increased appointments for identity verification?
- The supporting documents indicate that someone can get a good-cause exemption from the SAP process in “extreme dire-need” situations.
 - What constitutes “extreme dire-need” for SSA purposes and for the purposes of exemption under this proposal?
 - Is SSA planning to promulgate POMS or other adjudicative guidance defining extreme dire need and/or how it relates to a “dire need” circumstance as described in POMS DI 23020.030?
- What is SSA’s policy for identity documents required for the identity verification process in field offices?
 - What elements must be documented and what documentation will be required for verification?
 - Will SSA be issuing regulations or POMS regarding this process?
- If someone is unable to verify their identity through this process, is there an appeals process? If so, what will the appeals process entail and who will oversee it?
- SSA’s addendum indicates that the SAP will not be used for claims flagged as anomalous, and claims flagged as anomalous require in-person identity verification.
 - What constitutes an anomalous claim?
 - Why is the SAP process insufficient for anomalous claims?
 - If the SAP is insufficient for anomalous claims, what identity verification value does it bring that exceeds the validity of SSA’s current process?
- In the Addendum to the Supporting Statement for the Emergency Paperwork Reduction Act, SSA indicates it is “revising the overall use of the SAP to include only direct deposit

changes.” Does this mean that the SAP process would never be used when someone is applying for benefits?

- o Would SSA agree that such revision would mean SSA is prevented from applying the SAP process to other processes without further public notice?
- We renew our request for a cost-benefit analysis from SSA about the number of people negatively impacted by identity-related fraud versus the number of people negatively impacted by this change.

Respectfully,

Access Ready
American Association on Health and Disability
Autistic Self Advocacy Network (ASAN)
Community Legal Services of Philadelphia
Disability Belongs
Huntington’s Disease Society of America
Lakeshore Foundation
Muscular Dystrophy Association
National Association of the Deaf
National Association of Councils on Developmental Disabilities
National Organization of Social Security Claimants’ Representatives (NOSSCR)
National Down Syndrome Congress
The Arc of the United States
United Spinal Association