



Debra B. Whitman, Chair

July 7th, 2014

The Honorable Carolyn Colvin
Acting Commissioner, Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235-6401

Dear Acting Commissioner Colvin:

On behalf of the Leadership Council of Aging Organizations (LCAO), we are delighted to congratulate you on the President's recent announcement that he will nominate you as Commissioner. We look forward to continuing to work with you on our shared commitment to the mission and services of the Social Security Administration (SSA). We know and appreciate your dedication to public service and Social Security in particular.

In that spirit, the undersigned members of the LCAO are writing to express our ongoing concerns with the SSA's plan to eliminate two frequently requested field office services – Social Security Number printouts (SSN printouts) and benefit verification letters.

While benefit verification letters will continue to be provided via SSA's 1-800 number and online through "**my Social Security**" accounts as they are known, these options will not serve as meaningful alternatives for many individuals and cannot replace the availability of these services in the field offices. Prospective employers and state and local agencies (not all of which have access to data exchange) often require proof of income on an immediate basis – and requests made via the toll-free number take 5 to 7 days to execute, too long to wait in many cases. Additionally, many individuals are unable to successfully register for **my Social Security** accounts. It is also our understanding that online benefit verifications may overstate income for certain individuals because the online verifications may not reflect benefit offsets (such as for workers' compensation benefits). Furthermore, seniors, especially low-income seniors, are much less likely to have access to a computer, a secure Internet connection and/or a printer.

We support your efforts to decrease the demand for these documents by encouraging agencies that often drive beneficiaries to field offices to request these documents to instead make use of electronic data exchange, and to offer assistance with online options where possible. Decreasing demand in that way reduces the workload of field offices and reduces the burden on beneficiaries by saving them a trip to the field office. However, we do not believe eliminating the services at the field offices is appropriate for several reasons.

- First, the process of assuring the use of data exchange is not yet complete. We are not confident that all the necessary federal, state, and local agencies, and all their non-profit grantees, have adequate training and reliable access to electronic information. Beneficiaries should not be denied access because referring agencies have not yet done or been able to do what we would like them to. We do not believe that placing an additional hurdle in the path of wrongly directed beneficiaries is an effective or suitable way to ensure data exchange use or compliance.
- Second, not all requests are driven by agencies that have access to data exchange. Thus, denying the requests in the field offices would place a burden on many beneficiaries even after complete data exchange compliance.
- Third, we doubt that savings and work load reduction would flow from this policy. We know that field office workers are dedicated to customer service, and have enormous respect for them. We expect they will take time to explain the policy, and even more time to explain how to use the 1-800 number and to discuss **my Social Security** accounts, neither of which provides any guarantee of an immediate result. Therefore, we do not think the process of denying these documents to people who need them will be appreciably less onerous or time-consuming than simply providing the documents themselves.

We do not believe that a wholesale redirection of any remaining (post-data-exchange compliance) requests to the 1-800 number, or to the online **my Social Security** tool will be adequate. As you know, these requests would add to the already significant wait times on the 1-800 number, and a successful request there does not result in a same day document. These wait times create other problems, many of which are more acute for low-income older adults, an important constituency for you and for the members of LCAO.

LCAO is a coalition of national nonprofit organizations concerned with the well-being of America's older population and committed to representing their interests in the policy-making arena. As such, we are particularly concerned about the most vulnerable seniors--those who are frail and/or struggle with economic insecurity. Many may come to field offices with requests for these documents because of a need to continue working, or to prove eligibility for other programs. While some of those programs should use data exchange, not all are eligible to do so. For low-income older adults hoping to qualify for additional benefits from other programs, a wasted trip to a field office is no small matter.

SSA originally announced this winter that its field offices would no longer provide these documents and services, except in cases of “dire need,” effective April 1, 2014. After concerns were raised by aging and disability advocates and members of Congress, SSA delayed implementation to August 1 (for SSN printouts) and October 1 (for benefits verification letters.)

According to SSA, in 2012, field offices received 11 million requests which would have been denied under the new policy -- approximately 6 million SSN printouts and approximately 5 million benefit verification letters. Clearly, there is significant demand for each.

We understand that SSA has continued to work with other agencies to increase use of data exchange and decrease unnecessary referrals to field offices, and we will continue to support that work however we can. If this process were complete, it would eliminate much of the burden this policy is intended to address.

We do not believe the remaining months before implementation offer enough time for agencies to establish operational data exchanges with SSA. This shift may also require significant procedural changes and staff re-training to alter decades of culture and practice at state and local agencies, which in many cases have placed the burden of providing this information on applicants for public services and benefits. While you work to decrease requests at their sources, field offices should continue to provide this critical service. In the future, requests may come only from individuals who are not directed there by other agencies, and field offices should continue to grant them.

We urge SSA to remove any firm deadline for phase-out of field office provision of SSN printouts and benefit verification letters. Thank you for your time and attention, and we look forward to speaking with you about this further at a later date.

Sincerely,

AFGE Social Security Council
AFL-CIO
AFSCME Retirees
AFT Retirees
Alliance for Retired Americans
American Society on Aging (ASA)
Association for Gerontology & Human Development in Historically Black Colleges and Universities (AGHDHBCU)
B'nai B'rith International
Center for Medicare Advocacy (CMA)
Easter Seals
Gray Panthers
International Association for Indigenous Aging (IA₂)

Lutheran Services in America Disability Network (LSA)
Medicare Rights Center
National Academy of Elder Law Attorneys (NAELA)
National Active and Retired Federal Employees Association (NARFE)
National Adult Day Services Association (NADSA)
National Alliance for Caregiving
National Asian Pacific Center on Aging (NAPCA)
National Association of Area Agencies on Aging (n4a)
National Association of Nutrition and Aging Services Programs (NANASP)
National Association of Professional Geriatric Care Managers (NAPGCM)
National Association of State Long-Term Care Ombudsman Programs (NASOP)
National Committee to Preserve Social Security and Medicare (NCPSSM)
National Council on Aging (NCOA)
National Senior Citizens Law Center (NSCLC)
National Senior Corps Association (NSCA)
OWL
Pension Rights Center
Senior Service America, INC.
Service Employees International Union (SEIU)
Services and Advocacy for Gay, Lesbian, Bisexual & Transgender Elders (SAGE)
Southeast Asia Resource Action Center (SEARAC)
Wider Opportunities for Women (WOW)
Women's Institute for a Secure Retirement (WISER)