



May 9, 2025

Lee Saunders  
President

Elissa McBride  
Secretary-Treasurer

**Vice Presidents**

Michael Avant Jr.  
Oakland, CA

Jody Barr  
New Britain, CT

Mark Bernard  
Boston, MA

Ron Briggs  
Latham, NY

Lester Crockett  
New York, NY

Connie Derr  
Albuquerque, NM

Shannon S. Douvier  
St. Cloud, MN

Craig A. Ford  
Newark, NJ

Henry A. Garrido  
New York, NY

R. Sean Grayson  
Worthington, OH

Veronica L. Gunn  
Vernon, CA

Johanna Puno Hester  
San Diego, CA

Kelly Indish  
Flint, MI

Corey Hope Leaffer  
Portland, OR

Roberta Lynch  
Chicago, IL

Christopher Mabe  
Westerville, OH

Jessica Martinez Santos  
San Juan, PR

Sue McCormick  
Duncansville, PA

Douglas Moore Jr.  
San Diego, CA

Charmaine S. Morales  
San Dimas, CA

Patrick Moran  
Baltimore, MD

Michael Newman  
Chicago, IL

Jeff Ormsby  
Lexington, TX

Debbie Parks  
Hamilton, NJ

Lloyd Permaul  
Baton Rouge, LA

Randy Perreira  
Honolulu, HI

Michael Rivera  
Rochester, NY

Joseph P. Rugola  
Columbus, OH

Paul Spink  
Milwaukee, WI

Mary E. Sullivan  
Albany, NY

Tom Tosti  
Plymouth Meeting, PA

Anthony Wells  
New York, NY

Mike Yestranski  
Olympia, WA

Frank Bisignano  
Commissioner  
Social Security Administration  
6401 Security Boulevard  
Woodlawn, MD 21207

*Submitted via [www.regulations.gov](http://www.regulations.gov).*

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

Dear Commissioner Bisignano:

The American Federation of State, County and Municipal Employees (AFSCME) urges the Social Security Administration (SSA) to withdraw its proposed New Emergency Request establishing new requirements for identifying proofing, including requiring the creation of a Security Authentication PIN (SAP) for Social Security recipients or in-person identity verification in certain circumstances. The proposed requirement would impose harmful, unnecessary burdens on Social Security recipients, without providing any meaningful benefit to the health of the Social Security trust funds or increased protection to beneficiaries.

AFSCME members provide the vital services that make America happen. With 1.4 million members in communities across the nation, serving in hundreds of different occupations — from nurses to corrections officers, child care providers to sanitation workers — AFSCME advocates for fairness in the workplace, excellence in public services and freedom and opportunity for all working families. The vast majority of working AFSCME members contribute to Social Security. Furthermore, among the approximately 200,000 AFSCME members who are retired public service workers, a great many rely on these benefits as a vital source of income that allows them to live with security and dignity in retirement.

**The Proposed Requirement Will Interfere with Individuals Receiving Their Earned Benefits**

Imposing a new SAP requirement, or requiring in-person identity verification for those unable to create a SAP, will make it more difficult for Americans to receive the benefits they have earned. SSA phone wait times are already much too long. As of April 25, 2025, SSA data shows the average call wait time is already 1 hour and 30 minutes.<sup>1</sup> This new requirement will necessarily increase call length, require individuals to make follow-up calls

<sup>1</sup> <https://www.ssa.gov/ssa-performance/800-number-performance>

and therefore make wait times even longer. Furthermore, requiring more people to show up in person at SSA offices while the administration simultaneously proposes closing 47 SSA offices nationwide<sup>2</sup> will create an unmanageable system for beneficiaries seeking the benefits they have rightfully earned. The Center on Budget and Policy Priorities (CBPP) estimates that imposing the SAP requirement will require nearly 2 million more elderly and disabled people to make in-person visits to Social Security offices each year.<sup>3</sup>

### **SAPs Are More of a Burden than Protection**

In its supporting statement for this policy, SSA vaguely cites the need “[t]o mitigate fraud concerns” without providing further detail. However, SSA’s acting commissioner has acknowledged that direct deposit fraud accounts for less than one-hundredth of one percent of all SSA transactions.<sup>4</sup> While the acting commissioner also notes losses of over \$100 million annually, this represents only a tiny fraction of total benefit payments. In fact, only about 2,000 beneficiaries out of millions were affected last year.<sup>5</sup> Moreover, the SSA Office of the Inspector General reports that most fraudulent activity is detected and prevented before any improper payments are issued.<sup>6</sup> Given the significant burden that SAP requirements will place on beneficiaries, who are a particularly vulnerable population, it appears that imposing these measures is neither justified nor cost-effective, especially in response to fraud that affects so few and constitutes such a small portion of SSA’s operations.

### **SSA Should Expand ID Verification Options to Ease the Burden on Beneficiaries**

As the CBPP report highlights, implementing the SAP would require millions of beneficiaries to travel to SSA offices in person. While in-person services are essential for some and should be expanded, not consolidated, the reality is that many SSA beneficiaries rely on phone and remote services due to significant mobility challenges. These challenges are often caused by age-related conditions, chronic illness or disability, which make travel to SSA offices burdensome or even impossible for many.

In fact, the National Institute of Standards and Technology (NIST) addresses this concern in its Digital Identity Guidelines, Special Publication 800-63A. Section 8, "Usability Considerations," explicitly states that federal agencies and their service providers are expected to design systems and services with the needs of people with disabilities in mind.<sup>7</sup> Requiring an estimated two million additional elderly or disabled individuals to appear in person disregards this principle and undermines efforts to make federal services truly inclusive.

---

<sup>2</sup> <https://apnews.com/article/social-security-offices-closures-doge-trump-b2b1a5b2ba4fb968abc3379bf90715ff>

<sup>3</sup> <https://www.cbpp.org/blog/nearly-2-million-more-people-will-need-to-visit-social-security-offices-under-revised-policy>

<sup>4</sup> Fatima Hussein, *Changes Coming for Social Security payments and direct deposit. What to know.* NBC Los Angeles (March 19, 2025), [https://www.nbclosangeles.com/news/national-international/changes-coming-for-social-security-payments-direct-deposit-what-to-know/3659167/?os=fno\\_journeystrueno\\_journeys%3Dtrue&ref=app](https://www.nbclosangeles.com/news/national-international/changes-coming-for-social-security-payments-direct-deposit-what-to-know/3659167/?os=fno_journeystrueno_journeys%3Dtrue&ref=app).

<sup>5</sup> Tara Siegel Bernard, *How Fraudsters Break Into Social Security Accounts and Steal Benefits*, NY Times (March 9, 2025), [https://www.nytimes.com/2024/03/09/business/social-security-scams.html?unlocked\\_article\\_code=1.C08.WKGY.2jlfceOfmYXM&smid=url-share](https://www.nytimes.com/2024/03/09/business/social-security-scams.html?unlocked_article_code=1.C08.WKGY.2jlfceOfmYXM&smid=url-share) (approximately 2,000 beneficiaries out of 70 million beneficiaries had their direct deposits redirected last year).

<sup>6</sup> <https://oig-files.ssa.gov/audits/summary/A-01-18-50669Summary.pdf>

<sup>7</sup> <https://pages.nist.gov/800-63-4/sp800-63a.html>

This approach also runs counter to broader goals of equity and access in government service delivery. Rather than narrowing the paths available for identity verification, SSA should be prioritizing flexibility and accessibility, especially for the vulnerable populations it primarily serves. Expanding, rather than restricting, verification options would better align with both SSA's mission and federal accessibility standards. Imposing unnecessary barriers, such as the SAP, will not only fail to meet the stated goals of the proposed rule but may also exacerbate disparities in access to critical benefits and services.

With these critical concerns in mind, we urge SSA to withdraw the new SAP requirements and reconsider its approach to identity verification.

Sincerely,

/s/ Dalia R. Thornton

Dalia R. Thornton  
Director  
Department of Research and Collective  
Bargaining Services