



1275 First Street NE, Suite 1200, Washington, DC 20002  
202-408-1080 Fax: 202-408-1056 center@cbpp.org www.cbpp.org

May 9, 2025

Social Security Administration  
OLCA  
Attn: Reports Clearance Director  
Mail Stop 3253 Altmeyer  
6401 Security Blvd.  
Baltimore, MD 21235

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

Re: Agency Information Collection Activities: New Emergency Request, April 18, 2025, Federal Register Doc. 2025-06773, Docket No: SSA-2025-0014

Dear Reports Clearance Director:

This comment is submitted on behalf of the Center on Budget and Policy Priorities (CBPP) to raise questions and concerns about a new agency policy that no longer allows beneficiaries to make direct deposit changes solely by phone and requires an online Security Authentication PIN (SAP) to complete certain transactions, published in the *Federal Register* on April 18, 2025.

CBPP is a nonpartisan research and policy institute that advances federal and state policies to help build a nation where everyone — regardless of income, race, ethnicity, sexual orientation, gender identity, ZIP code, immigration status, or disability status — has the resources they need to thrive and share in the nation's prosperity. We apply our expertise in programs and policies to inform debates on issues affecting low- and moderate-income people and fiscal policy. Through our work we have developed a deep knowledge of eligibility and enrollment policies and processes, and of the short- and long-term benefits of major federal benefit programs, including the Social Security and Supplemental Security Income benefits specifically implicated in this new policy. We appreciate the opportunity to comment on the issues presented by the new policy.

While CBPP has a long history of supporting anti-fraud policies and technology in Social Security programs, we have serious concerns with these changes. We agree that safeguarding taxpayer dollars against waste, fraud, and abuse is an important part of SSA's mission. However, like any policy change, anti-fraud measures must be subject to rigorous cost-benefit analysis to ensure that their benefits justify their costs — both to the agency and to the public. This includes comprehensively assessing customer burdens, access to benefits, and unintended consequences. The materials the agency has presented in the Federal Register do not include a cost-benefit analysis or the relevant

metrics to complete one. However, it becomes clear looking at other sources that the costs of this proposal far outweigh any benefits.

SSA has framed the end of direct deposit changes solely by phone and the beginning of the SAP requirement as “emergency” measures that required abrupt changes without prior public comment. In fact, the emergency is one of the Administration’s own making. The SAP described in these documents purportedly eases a burden on the public, by creating an alternative to beneficiaries needing to visit Social Security offices in person to make direct deposit changes. But the in-person requirement itself was imposed by the Administration just a few weeks ago, on April 14, without public comment. In fact, both of these changes should be viewed together in terms of their impact.

Together, these burdensome new requirements raise serious questions of judgement. The amount of dollars at immediate risk of fraudulently being redirected is very low compared to the potential harm to beneficiaries who will be burdened by these rushed changes. Additionally, by hastily undertaking this policy change, which will significantly change how tens of thousands of beneficiaries engage with SSA each week, SSA will increase confusion and misinformation among beneficiaries, leading to additional harm with almost no benefit. Having already erred in this misjudgment, prior to seeking to make these changes permanent, the agency should first answer clarifying questions, present a complete cost-benefit analysis, and conduct an evaluation of the pilot phase of these efforts.

No longer allowing direct deposit changes solely by phone is a notable reversal for SSA. Over many years, across Administrations representing different political parties, the agency has consistently offered more services to the public across more channels, increasing accessibility and efficiency. Those tools include automated services by phone, *my Social Security*, online applications for retirement and disability, online tools to check eligibility and estimate benefits, text messaging, mobile wage reporting, and more. By contrast, no longer allowing direct deposit changes by phone without a cumbersome new authentication process — which must be completed online or in-person in a field office — will move the agency’s services in the opposite direction, decreasing accessibility and efficiency.

### **SSA Does Not Justify Abrupt and Sweeping Changes with Evidence**

Though the policy change outlined in the Federal Register is purported to reduce direct deposit fraud by telephone, the supporting materials provide no metrics about the problem and no explanation for why it constitutes an “emergency” that requires sudden changes with no public comment beforehand. The documents omit any estimates of the number or percent of beneficiaries whose benefits are misdirected due to direct deposit fraud, or the dollar amount or percentage of benefits misdirected, making it difficult for the public or the Office of Management and Budget to properly assess the costs and benefits of the change.

However, in other sources, agency officials provide more details, revealing that the risk of misdirected benefits due to direct deposit fraud is extremely low. In March 2024, agency anti-fraud officials at SSA estimated that “2,000 beneficiaries had their direct deposits redirected” the year before by any means — online, phone, or in person.<sup>1</sup> That represents just one one-hundredth of one

---

<sup>1</sup> <https://www.nytimes.com/2024/03/09/business/social-security-scams.html>

percent of the over 70 million people who receive Social Security or SSI benefits. Likewise, Acting Commissioner Leland Dudek estimated that over \$100 million in Social Security benefits are misdirected due to direct deposit fraud.<sup>2</sup> Again, this represents just one one-hundredth of one percent of the \$1.5 trillion in benefits paid last year.

When examining direct deposit fraud by telephone — the focus of this new policy — the numbers are yet smaller. The agency’s supporting statement estimates that less than half (42%) of direct deposit fraud happens by phone, which means that the annual number of beneficiaries subject to benefit misdirection because of fraud on the phone likely numbers in the hundreds. Furthermore, that means that most direct deposit fraud (58%) occurs in the other service channels — online or in person — that the agency will now require beneficiaries who previously made direct deposit changes by telephone to use. Thus, it is not clear that forcing beneficiaries to use these alternative channels will meaningfully reduce the occurrence or magnitude of this type of fraud.

### **SSA’s Proposed Solution Imposes Large Costs and Burdens, Mostly Not Reflected in Documents**

While the problem with direct deposit fraud by telephone appears to be very small, the agency’s proposed solution will create large new costs for the agency and burdens on beneficiaries, as shown in these documents — even though on customer burden, many important measures are omitted or underestimated. The new policy requires all callers seeking to make direct deposit changes to either authenticate their identities online or in person — meaning that they can no longer make direct deposit changes solely by phone. The supporting statement estimates that about half of callers (1.9 million) will avail themselves of the new SAP, while the other half (1.9 million) will not, requiring them to visit Social Security field offices in person. Both options will be more burdensome relative to current options, with the additional burden much greater than the agency’s estimates suggest.

For callers seeking to change their direct deposit information by phone who authenticate their identities online, the challenges will be substantial. Whereas before they could achieve their aim by calling Social Security and providing knowledge-based answers directly to a telephone agent to authenticate their identity, now:

1. **They will need internet service and a computer and/or smartphone.** This is a significant barrier for a large number of the people SSA serves. About 3 in 10 people over age 65 do not have broadband.<sup>3</sup> About 4 in 10 do not own a smartphone.<sup>4</sup> About 1 in 10 say they never use the internet at all.<sup>5</sup>
2. **They will need a *my Social Security* account.** To date, about 71 million people have accounts. While this number might sound high compared to the number of current SSA beneficiaries, it is not compared to the hundreds of millions of Social Security-covered

---

<sup>2</sup> <https://www.nbclosangeles.com/news/national-international/changes-coming-for-social-security-payments-direct-deposit-what-to-know/3659167/>

<sup>3</sup> <https://www.pewresearch.org/internet/fact-sheet/internet-broadband/>

<sup>4</sup> <https://www.pewresearch.org/short-reads/2022/01/13/share-of-those-65-and-older-who-are-tech-users-has-grown-in-the-past-decade/>

<sup>5</sup> <https://www.pewresearch.org/internet/fact-sheet/internet-broadband/>

workers whom the agency has encouraged to open accounts. The number of people who have opened accounts includes a large fraction of workers not receiving Social Security who use their online accounts to access their Social Security statements — which are typically no longer sent in the mail. It also includes beneficiaries who can no longer access their accounts (e.g., unable to authenticate with new requirements, or experienced health declines that preclude continued use). SSA provides no estimates in the supporting documents of the number of people affected by this policy who lack access to a necessary tool to complete it.

3. **If they don't have a *my Social Security* account, they'll have to hang up, create one, and start the process again.** Many people who don't already have an account face challenges in setting one up, and so will need to seek help or may not be able to do so. Even if they can do it independently, the process for setting up an account takes time. After that, the beneficiary must initiate a new call to SSA to generate a temporary PIN — a significant burden at a time when most callers to SSA do not reach an agent on the first try, and the wait time for a call back from SSA was averaging roughly 2 hours and 20 minutes between February and April 2025.<sup>6</sup> Then, once the beneficiary gets through, they must start over again to try to complete the transaction, including generating the PIN. All told, this will take hours, if a beneficiary can manage it all. But none of that time is reflected in these documents, which estimates the burden for “Member[s] of public requesting direct deposit who cannot complete over the phone” as a mere two minutes — presumably the amount of time it takes for the caller to request a direct deposit change, then for the agent to ask if they have a *my Social Security* account and instruct them to hang up, create one, and call back.
4. **They will need technological savvy to navigate a multi-step, multi-factor online verification process to log in to their accounts.** SSA created a new authentication process in 2021, then recently changed it to add additional steps. SSA reports elsewhere that millions of users have not yet made the transition to 2021 authentication requirements.<sup>7</sup> Several of the more recent changes are difficult for customers without tech savvy to navigate, such as taking a “selfie” with a smartphone to match a government-issued ID. The changes themselves have caused more frequent crashes on SSA's systems, making them more difficult to access.<sup>8</sup> And some users — particularly seniors and people with disabilities who may have cognitive disabilities or problems with executive function — may struggle with these tasks. SSA provides no estimates of how many users of my Social Security fail the authentication process, or why, though they could generate metrics and conduct user testing to find out.
5. **They will need to generate a temporary SAP while on the phone with a teleservice center employee.** Once a customer has logged in, they must generate a temporary PIN that works for 30 minutes. To do so, a teleservice center employee will send them a link. SSA has provided no public instructions to beneficiaries or the people who support them, so the steps remain opaque. Based on the documents in the Federal Register notice, it appears that they will need to use multiple devices (e.g., a phone and a computer) or toggle between the call and SSA's site on the same device. Either way, this will prove challenging for many users. Abbie Richie from the Smarter Service, a tech support company serving older adults,

---

<sup>6</sup> <https://www.ssa.gov/ssa-performance/800-number-performance>

<sup>7</sup> <https://blog.ssa.gov/how-to-contact-social-security-what-you-need-to-know-about-recent-changes/>

<sup>8</sup> <https://www.washingtonpost.com/podcasts/post-reports/long-waits-website-crashes-social-security-is-breaking-down/>

was recently quoted in the *Washington Post*: “many older adults still struggle to navigate logging into and using websites that typically require additional authentication. Anything with multiple steps, or that requires switching between tabs, apps or devices, is especially challenging.”<sup>9</sup> SSA estimates the time burden for “Member[s] of public requesting phone-based assistance direct deposit assistance via SAP Process” at just 8 minute, which seems very low considering all the steps involved. Again, SSA could generate metrics and conduct user testing for a more accurate estimate.

Only after completing all these steps can a beneficiary make a direct deposit change on the phone. It is little wonder that the agency estimates that at least half of beneficiaries will fail to do so. If they don’t, they will need to visit Social Security offices to authenticate their identities in person. This creates its own set of challenges:

1. **Make an appointment.** The documents in the Federal Register do not make it clear whether beneficiaries will require an appointment for in-person identity authentication; nor do public-facing materials. If there is no exception to the agency’s policy requiring an appointment, getting one will prove onerous. To make an appointment, people must call the agency’s 800 number, where the wait time for a call back averages over 2 hours and most callers do not reach an agent.<sup>10</sup> Then over 60 percent of people must wait over 28 days for an appointment — if they’re lucky.<sup>11</sup> In fact, “field office calendars are often booked out the full 40 business days that the system allows,” so getting an appointment may require another lengthy phone call.<sup>12</sup> None of this is reflected in the agency’s burden estimates.
2. **Gather necessary documents.** The documents in the Federal Register or in public communications also do not make it clear what identity documents will be required for people who authenticate in person. For the 13% of people age 70 and older who don’t have a drivers license, this could pose a challenge.<sup>13</sup> Any documentation beyond a drivers license will also likely take additional time to collect. This time is not reflected in the SSA documents.
3. **Travel to an office.** Many Social Security beneficiaries don’t drive, while others have mobility issues that make getting to in-person appointments difficult or burdensome, even if they do not live great distances away. Based on the 2022 National Household Travel Survey, nationally, it’s estimated that over 6 million seniors don’t drive, and nearly 8 million seniors report a medical condition or disability that makes it difficult to travel outside the home.<sup>14</sup> These beneficiaries will need to seek help with transportation, and may not be able to access it. The difficulty this can pose is especially daunting in rural areas. Nationwide, 6 million seniors live more than a 45-mile trip from their field office; in 35 states, over 10% of seniors

---

<sup>9</sup> <https://www.washingtonpost.com/technology/2025/04/26/customer-service-social-security-irs-government-cuts/>

<sup>10</sup> <https://www.ssa.gov/ssa-performance/800-number-performance>

<sup>11</sup> <https://www.ssa.gov/ssa-performance/processing-time-benefits>

<sup>12</sup> <https://oig.ssa.gov/assets/uploads/152307.pdf>

<sup>13</sup> <https://www.iihs.org/topics/older-drivers>

<sup>14</sup> <https://nhts.ornl.gov/>

do.<sup>15</sup> In Alaska, some residents live hundreds of miles from their nearest field office — there are only three statewide — and some communities are not connected to SSA field offices by roads.<sup>16</sup> And in North Dakota, 13,000 seniors live more than 180 miles roundtrip from their nearest field office, according to CBPP analysis.<sup>17</sup> None of the previously unnecessary travel time necessitated by SSA’s April change in direct deposit policy is reflected in the SSA estimates of burden. In fact, the documents explicitly say they did not include “Travel Time burden, as we already account for this burden under OMB No. 0960-0789, and we do not want to double-count it here.” However, there is no risk of double-counting, since no such burden previously existed for beneficiaries who wished to change their direct deposit information by phone. Appropriately and more accurately including travel time to and from a Social Security office required by this new policy would significantly increase SSA’s total time burden estimate. Our analysis shows that for seniors nationally, a round-trip drive to the nearest SSA office would take 45 minutes on average. SSA should provide its own time analysis, and also add the cost of gas time value to its cost estimates.

4. **Wait in the office.** Once a person arrives at an SSA office, they must wait for a representative. SSA estimates the in-office wait at about 23 minutes, which it says is based on data from last fiscal year (though this year, the wait is somewhat longer).
5. **Appointment time.** Once the beneficiary talks to a claims representative, they must produce their documents and make their direct deposit change. The documents estimate this at 8 minutes. While this seems plausible, it will be important for the agency to document the actual time it takes now that the new policy is in place.

In short, SSA did not come close to properly estimating the time burden associated with the new policies.

In addition, the agency’s accounting of psychological burden referred only to the confusion and inconvenience of the new policies, without mentioning their emotional burden. Notably, direct deposit changes are often necessitated by difficult circumstances, particularly for the older and disabled population that SSA serves. For example, a beneficiary’s health may decline, requiring him to move closer to a family caregiver and get a new bank. Or the husband that managed a couple’s finances dies, requiring his widow to set up a new account of her own. Or a beneficiary’s bank account is compromised by identity theft, and she must change all of her financial accounts to regain control of them. In these and other cases, beneficiaries and their families will have many other tasks to manage — financial and otherwise — in extraordinarily stressful times.

It is also not clear to what extent these changes affect beneficiaries who require representative payees. For example, if cognitive decline means a beneficiary can no longer manage their own finances and needs someone to help, how do these changes affect a family member who steps in as representative payee? If a beneficiary moves into a nursing home or assisted living, and the facility becomes the organizational payee, what is the process?

---

<sup>15</sup> <https://www.cbpp.org/research/social-security/restricting-phone-services-for-social-security-will-harm-seniors>

<sup>16</sup> <https://www.juneauempire.com/news/social-security-may-cut-phone-support-force-alaskans-online-or-to-juneau-anchorage-and-fairbanks/>

<sup>17</sup> <https://www.cbpp.org/research/social-security/restricting-phone-services-for-social-security-will-harm-seniors>

In addition to the large new burdens on beneficiaries, this policy will incur significant new costs for SSA. The documentation does not include any estimate of additional workyears required by SSA staff. Even using the provided figures (which, as described above, are likely underestimates), the new policy would require the equivalent of roughly 280 additional full-time staff (i.e. 34.9 million additional minutes of work). SSA estimates the annual cost to the Federal government at approximately \$1,168,709,600. This number seems unreasonably high for an agency whose entire annual operating budget is about \$14 billion. Either SSA has miscalculated the costs of the new policy, it will be extremely expensive to implement the policy, or both. If this figure is merely a typo, it is another indication of the unnecessarily rushed nature of this policy change. If the figure was calculated erroneously and did not raise any concerns among decisionmakers, it would show that they intended to move forward with this policy without regard to cost and did not seriously engage with their own analysis. Either way, the agency should clarify.

The documents also don't address how SSA will take on this new workload even as the agency has already reportedly cut 7,000 staff — many in front-line jobs — with potentially more to come.<sup>18</sup> SSA's field offices will see close to 2 million additional visitors each year as a direct result of this voluntary and unnecessary choice to change this policy, even as the number of people staffing those offices declines. SSA reported elsewhere that as of mid-March, over 2,000 frontline staff had taken the voluntary separation incentive program (i.e., buyout) alone, and that dozens of field offices had lost more than a quarter of their staff.<sup>19</sup> SSA doesn't address what other work will be delayed or left undone because field office and teleservice center staff are now dealing with these time-consuming new workloads.

Finally, since the direct deposit changes were first announced, it's become clear that both the changes themselves and their rushed, confusing, and chaotic rollout have caused unintended consequences. Among them are anxious beneficiaries unnecessarily visiting field offices to provide identification, further straining SSA's customer service.<sup>20</sup> Even more troublingly, they have "led to an explosion in scams, as bad actors have taken advantage of the moment to send seniors emails purporting to be from Social Security and instructing them to provide their personal information to verify their identities."<sup>21</sup> This is precisely the opposite of the stated purpose of the direct deposit change.

### **SSA's Policy on Phone Claims Remains Opaque**

The agency's policy on telephone claims also remains confusing. After SSA initially announced that it would no longer allow any claims by phone, it limited the restriction to retirement, survivors, and dependents claims, then announced via X that phone claims would continue to be allowed. After that, this Federal Register notice said that anomalous phone claims could use the SAP process to

---

<sup>18</sup> <https://www.washingtonpost.com/politics/2025/04/04/social-security-layoffs-trump-musk/>

<sup>19</sup> [https://web.archive.org/web/20250403195939/https://www.ssa.gov/news/workforce/\\_;Lw!!Bg5easoyC-OI12vIEqY8mTBrTW-N4OJKAQ!NDWJQxPNNusZ11UjSQNcMkbQeiBtdVRb37KZup44reu06frcHdm7\\_KpeozTvRWmrDLCQD4fDpbwVL-BqsMP55CsOvPTNQ\\$](https://web.archive.org/web/20250403195939/https://www.ssa.gov/news/workforce/_;Lw!!Bg5easoyC-OI12vIEqY8mTBrTW-N4OJKAQ!NDWJQxPNNusZ11UjSQNcMkbQeiBtdVRb37KZup44reu06frcHdm7_KpeozTvRWmrDLCQD4fDpbwVL-BqsMP55CsOvPTNQ$)

<sup>20</sup> <https://www.usatoday.com/story/news/politics/2025/05/06/social-security-wait-times-longer/83385829007/>

<sup>21</sup> <https://www.washingtonpost.com/politics/2025/04/09/social-security-phone-doge-cuts/>

authenticate their identities, with little information on which or how many applications are flagged. Then the revised supporting documents said that anomalous phone claims could not use the SAP process and must visit offices to authenticate their identities, though the original notice retained the same language.

SSA should clarify the current policy on phone claims in its public communications, as well as in the Federal Register, to allow for public comment. To the extent that phone claimants will be subject to new burdens, SSA should quantify the extent of any improper payments based on phone claims, the percentage of phone claims flagged as anomalous, the method by which those flagged claims may move forward, whether appointments are required, which documents are needed, the time burden on applicants, and the cost — both in dollars and workyears — to the agency. It should also describe any feasible alternative path to validate applicants' identities, bearing in mind that SSA often interacts with claimants throughout the claims process, including in person and by mail.

## Questions

SSA should reconsider this burdensome new policy. However, if the agency proposes to extend it, prior to doing so it should provide:

- Clarification on the following questions:
  - Are initial claims flagged as anomalous subject to additional identity proofing?
  - Is the SAP an option for these applicants, or would all of them require in-person visits?
  - Are post-entitlement/eligibility changes other than direct deposit changes subject to additional identity proofing? If so, which ones?
  - Are individual and institutional representative payees subject to these new policies and processes? How does that work?
  - Are appointments needed for people who must visit field offices because they cannot use the SAP process?
- A full cost-benefit analysis, including:
  - The number and percentage of beneficiaries whose benefits are misdirected due to direct deposit fraud, broken down by service channel
  - The dollar amount and percentage of benefits that are misdirected due to direct deposit fraud, broken down by service channel
  - The dollar amount and percentage of misdirected benefits that are ultimately recovered by the agency, broken down by service channel
  - The number and percentage of initial claims are flagged as anomalous, broken down by service channel
  - The number and percentage of post-entitlement/eligibility changes other than direct deposit affected by this new policy, if any
  - The number and percentage of current beneficiaries who have *my Social Security* accounts, and then number and percentage that are active
  - The number and percentage of beneficiaries with *my Social Security* accounts who are unable to log in, before and after the introduction of the new authentication tools
  - The number of workyears agency staff are expected to spend on implementing the new policy

- The impact of the policy on other agency workflows (e.g., expected delays and backlogs)
- The government costs incurred implementing the new policy (assuming that the estimate of over \$1 billion is incorrect)
- An updated burden estimate, including:
  - The time to create a *my Social Security* account
  - The time to call SSA a second time, if a beneficiary is told on their first call they need to create an account and call back.
  - The time to generate a SAP, based on data collection and user testing
  - The time needed to call to make an appointment for in-person identity authentication (if required)
  - The time to gather identification documents for in-person authentication
  - The time to travel to SSA offices for in-person authentication
- As this new policy and process is being implemented on an “emergency” basis, without a pilot, any proposal to make them permanent should include a full evaluation, including user testing to determine the actual burdens
- To the extent that phone claimants will be subject to new burdens, SSA should quantify:
  - the extent of any improper payments based on phone claims,
  - the percentage of phone claims flagged as anomalous,
  - the method by which those flagged claims may move forward,
  - whether appointments are required,
  - which documents are needed,
  - the time burden on applicants,
  - the cost — both in dollars and workyears — to the agency
  - alternative options
- Finally, SSA should provide plain language communications to the public, explaining the new direct deposit policy and the SAP process