

Submitted to oea.net.post@ssa.gov

March 26, 2025

Leland Dudek  
Acting Commissioner  
Social Security Administration  
6401 Security Boulevard  
Baltimore, MD 21235

Re: Follow-up Questions and Comments to  
Identity Proofing Meeting

Dear Acting Commissioner Dudek:

We write on behalf of the National Coalition of Social Security and Supplemental Security Income Advocates, a coalition of more than five hundred advocates from nonprofit legal organizations, as well as some aging and/or disability advocacy organizations nationally, with particular expertise in the work of the Social Security Administration (SSA). We thank you and your staff for taking the time to meet with us earlier this week and for the opportunity to provide follow-up questions and comments regarding SSA's changes to identity verification.

We were relieved to learn today that SSA is postponing its new identify verification requirements for two weeks and exempting disability claims from the requirements. Even with a delay and this exemption, we believe that the harm these requirements will inflict will far outweigh any benefits in program integrity or administration. **In the strongest terms possible, we urge SSA to pause implementation of these requirements indefinitely.**

Even with a two-week delay, these identity verification requirements will roll out amid the pre-existing cluster of interacting policies and realities that are currently impeding access to SSA's services. People who need assistance from SSA must already navigate low staffing levels in field offices; the continued and ongoing loss of experienced staff that cannot be quickly replaced; lack of adequate training for newly reassigned frontline staff; a sizable number of people who cannot effectively use online services; and the inability for children to create mySocialSecurity accounts. Identity verification requirements will do lasting harm to SSA's mission to administer programs equitably, efficiently, and with care for those who depend on these benefits.

Identity verification requirements will impose an unreasonable burden on older adults, widows, and orphans. People who face barriers accessing technology and/or face obstacles traveling to a field office because of their age, disability, geography, poverty, or other circumstances are at particular risk. For example, people who are unhoused, homebound, in nursing homes or other institutions, or living in remote communities will be deprived of or face meaningful delays in receiving benefits to which they are entitled. We understand from news reports that SSA initially projected that these requirements would affect up to 85,000 claimants each week. Even exempting disability claims from that projection, the remaining impact will prevent eligible people from accessing benefits and cause delays and prolonged processing times.

We share SSA's interest in reducing scams that particularly target older adults. We do not believe that these identity verification requirements are calibrated to meet that goal. We renew our request from earlier this week for SSA to share its cost-benefit analysis on the number of people negatively impacted by identity-related fraud versus the number of people negatively impacted by this change; detailed plans for training staff at teleservice centers and field offices on the changes; and concrete plans to inform the public about the changes, such as public service announcements. We request more information about how SSA plans to assess the rollout and evaluate the costs and benefits of the changes, including the number of fraud cases before and after rollout.

If a publicly shared, data-driven analysis confirms that SSA must act now to reduce identity-related scams, we believe that SSA has strategies at its disposal to strengthen program integrity while reducing harm. For example, for direct deposit changes for current beneficiaries and recipients, if phone identity verification questions are not sufficient, SSA should ask callers for the bank account number of the bank account where their benefits are currently going. This information is likely not known to bad actors. If it were, then those actors would not need to change the direct deposit information with SSA, as they could access the current bank account.

If SSA proceeds with identity verification requirements for even some recipients, we believe that an additional two weeks will not allow SSA enough time to work out solutions that ensure that those who need benefits the most are not denied the ability to apply and qualify. We urge SSA to further delay the rollout of these requirements until additional evidence gathering, evaluation, planning, and preparation can be implemented, including detailed exception policies that respond to requests for reasonable accommodations.

### **Further Questions about SSA's Proposed Identity Verification Requirements:**

We have the following questions about the identity verification changes for people filing claims for Social Security and SSI benefits over the phone. We note that this change reflects an about turn in SSA policy over the last many years: SSA has pushed people to file benefit claims online and by phone to lessen the impact of in-person visits to field offices. This change reverses that process by requiring tens of thousands of people filing applications for benefits to go to field offices to provide identity documents. For each of these questions, we are asking for concrete data to support the change.

Our questions are:

1. Will the exception process that SSA is working to develop for benefits claimants who are unable to use mySocialSecurity to verify identity or go into a field office to verify identity include:
  - a) people with disabilities that preclude being able to handle the identity verification process at a field office;
  - b) people who are unable to travel to their local field office due to lack of private or public transportation or who have caregivers (e.g., parents, adult children caring

for elderly parents) who are unable to take off work to attend a field office appointment;

- c) people in institutional settings including nursing homes, hospitals, and correctional institutions who are unable to travel;
  - d) people who are homeless and unable to procure needed identification documents;
  - e) people who have been banned from Social Security offices; and
  - f) people described in subsections a) through c) above who lack adequate or any digital access that provides the ability to get through on the phone in a timely manner to make an appointment or to engage in video confirmation with field office staff?
2. We understood from our meeting this week that exceptions would be granted by field office staff; however, Social Security guidance in EM 24059 REV (03/07/2025) permits appointments to be scheduled via the teleservice center. How will teleservice staff coordinate with field office decision makers to grant exceptions in real time?
  3. 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 this verification? Will SSA be issuing regulations or POMS regarding this process?
  4. If a claimant is not providing bank account information to SSA as part of their application for benefits, since they are unbanked and do not have a bank account or do not want to receive any potential benefits by direct deposit, will they be exempted from the identity verification requirements before their application will be processed?
  5. What training does SSA plan for field office staff to apply the new identity verification process? Will field office staff have sufficient time to receive training and guidance before the implementation date?
  6. What customer experience research do you have on the ability of disabled, elderly, and individuals with limited technological access and expertise to use login.gov or ID.me to access SSA services?
  7. Has SSA assessed whether the teleservice centers are able to handle increased call volume for people seeking to schedule appointments at field offices?
  8. Has SSA assessed whether field office staffing is adequate to handle the influx of people who will need to come in for identity verification processing? Has SSA approved overtime for field office staff to cover the influx of people that must be seen the same day for identity verification processing?
  9. Has SSA assessed the negative impact and delays on all other field office and teleservice center workloads that will occur when staff have to focus instead on calls and meetings about identity verification processing?

10. Is there a conflict between SSA's statement that appointments are required for claimants to verify identity when they cannot use mySocialSecurity and the guidance in EM 24059 REV (03/07/2025) that field office staff provide same day service without an appointment in dire need cases as defined in POMS DI 23020.030?
11. Has SSA investigated the public outcry against the IRS's use of ID.me to grant taxpayers access to online services in 2023 and determined a way to avoid running into the same problems using it for this new ID policy? Has SSA looked at the issues raised by the Senate around the use of ID.me in other contexts?
12. Has SSA put a plan in place to deal with the new fraud opportunities that are already arising around SSA's proposed identity verification policy?
13. Please provide us with data about the following items:
  - a) Number of people per year impacted by fraudulent direct deposit changes over the phone over the last three fiscal years;
  - b) Number of people per year impacted by fraudulent direct deposit changes over the internet, including by use of mySocialSecurity accounts over the last three fiscal years;
  - c) Number of these fraudulent direct deposit issues that were resolved by the use of SSA's Direct Deposit Auto-Enrollment Fraud Prevention (DDFP) block over the last three fiscal years;
  - d) Number of fraudulent claims per year submitted by a third party under an assumed identity over the last three fiscal years;
  - e) Number of SSA beneficiaries and recipients who currently have a mySocialSecurity account versus total number of SSA beneficiaries and recipients;
  - f) Average driving time per state to a local field office;
  - g) Average wait time per state at the local field office; and how you expect these wait times to change in light of the new identity verification policy;
  - h) Average wait time per state for the field office to process an initial claim; and how you expect these wait times to change in light of the new identity verification policy;

- i) Average wait time to reach the teleservice center in FY24 versus FY25; and
- j) Staffing levels at field offices and teleservice centers expected by the end of April 2025, versus FY24 staffing levels.

On behalf of our coalition, we thank you for your consideration of our questions and concerns. We understand that you care about the efficiency of operations and quality of service delivery at SSA, and we appreciate the steps you took today to lessen the harm from the identity verification requirements.

We nonetheless urge SSA to pause implementation of the requirements indefinitely. If SSA elects to proceed, we urge that implementation be delayed until it can be supported by concrete data after a detailed cost benefit analysis and input from all stakeholders, and critical processes have been developed and tested in the field to ensure that Social Security beneficiaries and claimants are not denied critical benefits for which they are qualified to receive.

Sincerely,

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