



September 19, 2025

Frank J. Bisignano  
Commissioner  
Social Security Administration  
6401 Security Blvd.  
Baltimore, MD 21235

Submitted electronically to <http://www.regulations.gov>.

**Re: Agency Information Collection Activities: mySocial Security—Security Authentication PIN (Docket No: SSA-2025-0123)**

Dear Commissioner Bisignano:

AARP, which advocates for the more than 100 million Americans aged 50 and over, appreciates the opportunity to comment on the Social Security Administration’s (SSA’s) proposed changes to its Security Authorization PIN (SAP) policy.<sup>1</sup> Being able to access services and benefits by phone, in a way that is not overly burdensome, is critically important for the millions of hard-working and retired Americans who have earned their Social Security.

AARP greatly appreciates SSA’s focus on improving customer service and reducing wait times, whether calling on the phone, visiting in person, or using the website. This has long been a priority for AARP and our millions of members, who too often struggle to get the help they need from SSA in a timely manner. We have long fought for improvements to SSA’s phone system, especially the use of callback technology, which was industry standard for many years before SSA finally adopted it last year.

We understand that these changes to the SAP policy were designed to help expedite phone calls to the agency, where considerable time is spent verifying the identity of callers. AARP applauds SSA for the changes it made to the SAP policy after hearing from Americans about the importance of phone services, especially in rural and underserved areas of our country.

In a filing submitted to the Office of Management and Budget on July 31, 2025, and a blog post the following day, SSA clarified that use of the SAP “is **completely optional and you will not be required to visit a local field office** if you do not have a personal *my Social Security* account or choose not to use the SAP feature” (emphasis in original).<sup>2</sup>

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<sup>1</sup> Social Security Administration, “Agency Information Collection Activities: Proposed Request and Comment Request,” 90 Fed. Reg. 34327, July 21, 2025, <https://www.federalregister.gov/documents/2025/07/21/2025-13607/agency-information-collection-activities-proposed-request-and-comment-request>.

<sup>2</sup> Social Security Administration, “Version 2 - Justification for SAP Change Request for 0960-0846 (7-30-25),” July 31, 2025, <https://www.reginfo.gov/public/do/DownloadDocument?objectID=161021901>. Social Security Matters (blog), “Coming Soon: Enhanced Security Authentication PIN (SAP) for Online Account Holders – What You Need to Know,” August 2025, <https://blog.ssa.gov/coming-soon-enhanced-security-authentication-pin-sap/>.

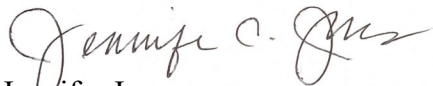
There are many reasons older Americans need to use phones to communicate with SSA, whether because of transportation or technology challenges, or simply because the questions they need answers to are ones that require a phone call. We appreciate SSA's work to meet older Americans where they are and to serve them in a manner that best meets their needs. We look forward to working with SSA to further improve customer service.

The filing also discussed the identity verification requirements implemented this past spring for direct deposit changes. AARP supports protocols to secure and protect Americans' data. We encourage SSA to monitor for any negative impacts related to this change and to continue pursuing technological enhancements that protect Americans' accounts while still ensuring convenient access to services.

We believe the current SAP proposal strikes a balance between ensuring access to services and benefits, strengthening fraud prevention and identity verification, and potentially reducing call wait times. We appreciate the improvements in this SAP proposal as well as SSA's willingness to adjust your plans in response to older Americans' concerns. We look forward to continuing to work with SSA as you begin to implement the SAP process.

If you have questions, please feel free to contact me or have your staff contact Elisa Walker on our Government Affairs team at [eawalker@arp.org](mailto:eawalker@arp.org).

Sincerely,



Jennifer Jones  
Vice President  
Financial Security & Livable Communities  
AARP