



June 6, 2025

The Honorable Frank Bisignano  
Commissioner of Social Security  
6401 Security Boulevard  
Baltimore, MD 21235

Dear Commissioner Bisignano:

The Consortium of Constituents with Disabilities (CCD) Social Security Task Force (SSTF) congratulates you on your confirmation as the Commissioner of Social Security.

CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. Our Social Security Task Force focuses on disability policy issues in the Title II Social Security Disability Income (SSDI) program and the Title XVI Supplemental Security Income (SSI) program.

Broadly, it is our mission to advocate for adequate funding so that SSA has sufficient resources to provide the high-quality customer service that constituents deserve; ensure that all SSA policy proposals consider the impact on people with disabilities; advocate for legislation and policy changes that improve benefits; and prioritize minimizing the administrative burden on beneficiaries, claimants, and members of the public.

We use our collective expertise to offer recommendations on a wide range of legislative and administrative issues impacting people with disabilities, and we would welcome the opportunity to meet with you to provide our expertise as you familiarize yourself with the agency and prioritize your agenda.

You have been tasked with optimizing efficiencies at an agency that houses a complex web of programs. We encourage you to utilize our familiarity with these programs as you begin your tenure. As a starting guide, we refer you to our prior Congressional testimony<sup>1</sup> and offer the following brief recommendations for immediately improving efficiencies:

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<sup>1</sup> Testimony of Jennifer Burdick on behalf of CCD-SSTF at House Ways and Means Hearing (Oct. 23, 2023), available at, <https://gop-waysandmeans.house.gov/event/social-security-subcommittee-hearing-on-onemillion-claims-and-growing-improving-social-securitys-disability-adjudication-process/>.

### **1. Prioritize Creating a Complete Online Application for All SSI Applicants (Including Children)**

While the agency has made some progress toward realizing an online SSI application, there are still large portions of the population who are unable to utilize this tool due to agency restrictions (children, those with prior applications, married individuals, and those 65+).<sup>2</sup> The unavailability of a fully-realized online SSI application creates significant administrative burden as the agency navigates increased calls, field office visits, and paper applications.

### **2. Streamline Data Collection to More Effectively Obtain Treating Source Evidence**

All too often, instead of obtaining existing treating-source evidence, DDS adjudicators rely on reports from costly consultative examiners (CE), who meet claimants on one brief occasion to evaluate their disability. When available, the agency should prioritize getting information from treating sources, including more treating-source opinions and more efficient health data collection by expanding existing programs like the agency's existing Health IT (HIT) partnerships. By properly collecting existing medical records instead of sourcing new data, the agency will save time and resources and will enable decisionmakers to focus on probative treating source evidence, leading to more accurate decisions and reducing the need for appeals.

### **3. Eliminate the Reconsideration Level of Review**

Once more accurate decision-making is employed at the initial level through increased access to and reliance upon treating source data, eliminate the reconsideration level of review. This second level of review adds months of unnecessary wait time to disability claims, disadvantaging claimants and increasing the ballooning agency backlog.

During the agency's prior 20-year long pilot where reconsideration was successfully eliminated in ten states, the agency conceded that "eliminating the reconsideration step enables claimants who appeal to reach the hearing level sooner than under the old process, and the resources previously used at the reconsideration step can be used to ensure a more complete determination process at the initial level."<sup>3</sup> We encourage you to review this existing data and remove this inefficient step in the disability adjudication process.

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<sup>2</sup> AARP, "Social Security Rolling Out Online Application for SSI," September 23, 2024, <https://www.aarp.org/social-security/ssi-online-application-rollout-2024/>.

<sup>3</sup> SSA, "New Disability Claims Process," 66 Federal Register 5501, January 19, 2001, <https://www.gpo.gov/fdsys/pkg/FR-2001-01-19/pdf/01-1442.pdf>.

#### **4. Update Outdated Occupational Information**

We urge you to update the occupational information SSA uses to make disability determinations to reflect jobs as they exist in the current economy, instead of as they existed in 1991, the last time the Dictionary of Occupational Titles (DOT) was updated. With your background, you are acutely aware of how significantly the occupational landscape has changed over the past 35 years. We ask that you utilize your practical knowledge to bring SSA into the modern era by sunseting reliance on the outdated DOT and enabling decisionmakers to rely instead on the already-paid-for Occupational Requirements Survey (ORS).<sup>44</sup>

#### **5. Add a Robust Online Scheduling Tool**

Nationwide, most states' Departments of Motor Vehicles already utilize an online scheduling portal that allows individuals to electronically reserve a place in line or schedule a future appointment. These platforms screen for the common types of needed appointments and filter the scheduling slots accordingly. SSA now requires appointments for in-person services but offers no online tool for scheduling. Instead, individuals needing an appointment must bog-down SSA's already crowded phone lines, speak with an agent, and schedule an appointment for a future date (often weeks or months away). It is vital that SSA maintain phone scheduling options because they are necessary for many. However, we recommend SSA utilize as many communication tools as possible to accommodate the diverse needs of the population it serves. We recommend that the agency additionally deploy an easy-to-use online scheduling tool, that includes a same-day "save my place in line" option for those with urgent, time-sensitive issues. This will reduce calls and streamline the agency's appointment module, allowing the agency to more effectively deliver service to every American household.

#### **6. Ensure Comprehensive Customer Service for All Individuals**

Prioritize full access to multiple customer service avenues for people with disabilities and older adults. Many of these individuals rely on in-person support, accessible phone assistance, and clear communication to navigate the complex benefits process. Strong customer service is essential to ensuring that the people who need Social Security the most are able to access the benefits they have earned and are eligible to receive.

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<sup>44</sup> Bureau of Labor Statistics, Occupational Requirements Survey, <https://www.bls.gov/ors/>.

As we noted at the outset, we stand ready to meet with you to offer our organizations' expertise as you begin improving customer service and increasing efficiencies at the agency that we all love and respect. We are invested in your successful leadership, and we look forward to working together over the next six years.

Respectfully submitted,

Access Ready Inc.

American Academy of Pediatrics

American Association on Health and Disability

American Council of the Blind

American Network of Community Options and Resources (ANCOR)

Association of People Supporting Employment First (APSE)

Autism Society of America

Community Legal Services of Philadelphia

Disability Belongs

Huntington's Disease Society of America

Lakeshore Foundation

Muscular Dystrophy Association

National Academy of Elder Law Attorneys (NAELA)

National Committee to Preserve Social Security and Medicare

National Disability Institute

National Organization of Social Security Claimants' Representatives (NOSSCR)

Special Needs Alliance

TASH

The ARC of the United States

United Spinal Association