

September 24, 2024

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

**Re: Docket ID Number [SSA-2024-0032]**

Dear Reports Clearance Officer Harley,

The National Organization of Social Security Claimants' Representatives (NOSSCR) is a specialized bar association of several thousand attorneys and advocates who represent Social Security disability claimants nationwide throughout the adjudicative process. NOSSCR's mission is to advocate for improvements in Social Security disability programs and to ensure that individuals with disabilities applying for Social Security Disability and SSI benefits have access to highly qualified representation and receive fair decisions.

Thank you for allowing us the opportunity to submit comments on the SSI Simplification Phase I initiative. We are excited to see the progress that the agency is making to modernize, and we look forward to the implementation and expansion of iSSI.

### **Third-Party Assistors—Electronic Signatures**

While we appreciate that applicants filing for themselves will be able to electronically sign and complete the iSSI application, we encourage the agency to create a mechanism whereby applicants who are helped by registered representatives (those who have already been approved and credentialed by SSA) can also sign and complete the iSSI application without the need for subsequent attestation or wet-ink signature.

Federal regulations are clear regarding who is qualified to be a representative,<sup>1</sup> and these representatives are held to a high standard.<sup>2</sup> Many applicants for SSI need representation to navigate the complex application process, and evidence shows that SSI applicants are approved at a higher rate when they are represented.<sup>3</sup> Preventing

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<sup>1</sup> [https://www.ssa.gov/OP\\_Home/cfr20/404/404-1705.htm](https://www.ssa.gov/OP_Home/cfr20/404/404-1705.htm)

<sup>2</sup> [https://www.ssa.gov/representation/conduct\\_standards.htm](https://www.ssa.gov/representation/conduct_standards.htm)

<sup>3</sup> SSAB, "Filing for Social Security Disability Benefits: What Impact Does Professional Representation Have on the Process at the Initial Level" (September 2012), at figure 7, <https://www.ssab.gov/research/filing-for-social-security-disability-benefits-what-impact-does-professional-representation-have-on-the-process-at-the-initial-level/>

representatives from effectively completing the application will create roadblocks for many of the most impaired applicants.

We applaud the recent strides the agency has made in signature simplification: removing unnecessary signatures and increasing the acceptance of electronic signatures.<sup>4</sup> However, there remain substantial barriers at the outset of the application process for those who need the help of a registered representative.

The SSI applicant pool is necessarily low income, and therefore practical issues are to be expected—such as lacking access to a private computer, temporarily losing phone service, or frequently changing addresses. Without a stable phone and address, it is often very challenging to reconnect with a claimant to get an additional attestation of the information that they already provided and submitted via a registered representative.

Later review and attestation by applicants should not be required when they have already provided the extensive personal information necessary for their appointed representative to complete the SSI application. We urge the agency to create a mechanism that allows applicants who utilize representatives (something the agency encourages) to successfully complete applications without unnecessary later signatures and/or attestation. This will honor the claimant’s intent to submit an SSI application, and it will reduce the agency’s burden of tracking down a subsequent signature or attestation, which will speed up processing times.

### **Accessibility for All Applicants—Expedited Expansion**

We applaud the agency’s move to modernize and streamline the SSI filing process, yet we are concerned about access for many of the most vulnerable Americans. As written, only adults aged under age 64 and 10 months, who have never been married, and who have never applied for SSI benefits or been named as a parent on a child’s SSI record will be able to apply using the iSSI application.

These restrictions exclude large portions of the population who would certainly benefit from this simplified application process (the prior SSI application exclusion is particularly problematic as many SSI claimants require multiple applications over their lifetimes). We understand this proposal is only Phase 1—and we are excited for its implementation. However, we urge the agency to move swiftly to the next phase so that the impact of these modernization efforts can be more broadly experienced.

As part of this expansion, we encourage the agency to utilize this “simplified eligibility related questions” process even when individuals apply through other channels (in-person or by phone). Simplifying the process for all applicants and

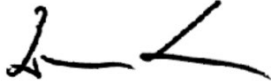
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<sup>4</sup> <https://blog.ssa.gov/were-making-it-easier-to-do-business-with-us-electronically/>

expanding the online accessibility to the broader community are welcomed changes and we look forward to their prompt implementation.

We thank the agency for their impressive work in improving application processing. We encourage the agency to continue on this path of modernization and simplification so that all eligible applicants can access SSA's vital programs.

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Camp', with a stylized flourish at the end.

David Camp  
Chief Executive Officer