

February 24, 2025

**Office of Management and Budget**

Attn: Desk Officer for SSA

**Social Security Administration, OLCA**

Attn: Reports Clearance Director

Mail Stop 3253 Altmeyer, 6401 Security Blvd.

Baltimore, MD 21235

**Re: Docket ID Number SSA-2024-0055**

To Whom It May Concern:

These comments are submitted on behalf of the National Organization of Social Security Claimants' Representatives (NOSSCR), a specialized bar association for attorneys and advocates who represent Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) claimants throughout the adjudication process and in federal court.

Thank you for the opportunity to comment on ways to enhance the quality, utility, and clarity of the Request for Hearing by Administrative Law Judge and Request for Reconsideration forms. While we understand that no substantive changes are being proposed on either form, we wanted to take a moment to flag a few ongoing inefficiencies with the forms' use.

First, while the agency correctly indicates that both forms allow the respondents to indicate their reasons(s) for disagreement with SSA's prior determinations in the case, it remains true that the prior determination's rationale is rarely provided to the individual, even when that person is represented by an attorney or non-attorney representative. The denial letters that the agency provides are typically boilerplate letters, sometimes with a sentence or two of reasoning, but rarely with a detailed rationale that would allow for an understanding of the reasons for denial. We encourage the agency to consider making available the Disability Determination Explanation (DDE) as soon as it is issued, both to the claimant and to any appointed representative, digitally via the ERE and via the claimant's mySocialSecurity account.

Second, the agency also indicates that these Request for Hearing and Request for Reconsideration forms allow respondents to indicate if they have additional evidence to submit and if they have or want to appoint a representative. While capturing this basic information is certainly necessary, we encourage the agency to

also utilize this as an opportunity to allow for the digital upload and tagging of any available evidence, as well as the digital appointment of a representative.

The processing of appointment of representative paperwork continues to utilize extensive agency resources due to lacking digital efficiencies. When a representative is appointed to assist a claimant on an application for benefits, the representative must wait for SSA to process the representative paperwork and attach it to the claimant's file before the representative can access any information about the claim electronically. Creating a mechanism for instant verification and attachment for registered representatives would save valuable agency time and resources.

Thank you for the consideration that you give to these forms and for allowing us the opportunity to comment.

Sincerely,

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

David Camp  
Chief Executive Officer