

March 17, 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-2024-0057**

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 the agency's burden estimate for the Social Security Benefits Application.

1) Electronic Signature Policy

We fear that the agency's burden estimate does not accurately account for individuals who begin applications, but whose applications are never processed due to an antiquated electronic signatures policy. While there is currently an Emergency Message (EM) that speaks to electronic signatures and application paperwork, the guidance in the POMS contradicts the EM, adding to unnecessary confusion at the field office level, resulting in rejected applications and reapplications. We believe this could be avoided, reducing the agency's burden, if a clear and efficient electronic signature policy were documented in the POMS.

2) Inefficient Application Process

We also believe that this burden estimate fails to capture those applications that are chilled by the complexity of the application and the difficulty individuals have navigating Social Security's phone system and accessing field offices. We encourage the agency to consider these additional factors when calculating the burden estimate.

Thank you for your consideration of our comments and your commitment to improving the Social Security disability application process.

Sincerely,

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

David Camp  
Chief Executive Officer and General Counsel