

July 30, 2024

The Honorable Ron Wyden Chair, Committee on Finance United States Senate Washington, DC 20510

Dear Committee Chair Wyden:

I am writing to provide updated information to the questions in your August 8, 2023 letter to Acting Commissioner Kijakazi and my January 31, 2024 interim reply, regarding the Social Security Adminstration's efforts to simplify the Supplemental Security Income (SSI) application process and our plan to provide the application online.

We have learned much from our conversations with SSI and disability benefit applicants about their experiences, which is informing our efforts to improve our application processes. We have begun a three-phased initiative to improve the SSI application process. This includes an introduction of a limited online SSI application by the end of calendar year 2024.

I hope you find this information helpful. If you wish to discuss this issue in more detail, please do not hesitate to contact me, or have your staff contact Tom Klouda, our Deputy Commissioner for Legislation and Congressional Affairs, at (202) 358-6030. I am sending a similar letter to Senators Brown and Casey.

Sincerely

Martin O'Malley

Commissioner

Enclosure

1. SSA's analysis of the current application process and identifying barriers for access for key segments of the SSI population, including, but not limited to, adults over age 65, disabled adults, disabled children, individuals experiencing homelessness, and children in the foster care system.

To learn more about the barriers individuals face when applying for SSI, we held listening sessions and conducted extensive customer experience research and usability testing. We also observed agency technicians in Field Offices conducting application interviews and conducted focus groups of claimants and their helpers filing online for disability using our iClaim system. From our research, we found:

- Some individuals are unaware of the benefits available to them. Some only became aware of the SSI program when we sent targeted mailings to Social Security beneficiaries who were potentially eligible for SSI.
- Applicants believed completing the SSI application process online would take too much time.
- Applicants requested a streamlined, transparent, and faster internet application experience.
- Approximately 14% of SSI applications are completed online.
- Applicants perceived that providing information about their disability, medical condition, and medical treatment was burdensome, complicated, and unnecessary.
- Some applicants lacked internet access, especially those experiencing homelessness and with low incomes. They also experienced challenges completing an application by telephone or by visiting a field office.
- The internet application is challenging to navigate on a mobile device. Although 79.8% of views of our internet screens are done from a mobile device, only 58% of individuals to start an internet application on a mobile device and only 25% of those applications are successfully submitted online.
- Applicants with limited or no English proficiency struggled to complete the internet application without language translation and often relied on assistance from family members or advocates. They also experienced delays scheduling application interviews and medical examinations due to difficulty obtaining interpreter services.
- When an individual files an SSI internet application on behalf of another person (e.g., children with disabilities in foster care), we must recontact the proper applicant to obtain a signature.
- Applicants facing homelessness or mental challenges have difficulty answering identity verification questions.
- 2. Documentation of the feedback that SSA has received from users following SSA testing different models for the simplified SSI application, both for the 'eligibility' portion and 'development' portion.

The agency's Customer Experience (CX) and the User Experience Testing (UXG) groups conducted research and usability testing on the application process including new, simplified SSI questions. Below is a summary of the UXG findings.

| Rounds<br>of<br>Testing | User Tester<br>Profile   | Responses  |
|-------------------------|--------------------------|--|
| 1                       | Members of<br>the public | Round one focused on applicants recruited by advocacy groups. Applicants were age 18-64, disabled, non-blind, and married.  Applicants recommended the following:  • Simpler way to answer questions  • Easier-to-understand questions  • Use of empathetic language  • Caring and empathetic communication of denied application  • More context and examples throughout the application process  |
| 2                       | SSA<br>Technicians       | Round two focused on the development experience through technician interviews. Technicians played the role of an age 50 to 64 married individual who is not blind and lives with a spouse and child.  Noted issues included:  • Lack of plain language (68%) • Required recontact with applicant to obtain key information needed to determine eligibility and claim processing (12%) • Technicians often cannot get in touch with the applicant due to reasons such as unanswered calls, unreturned messages, and invalid contact information (8%) • Helper text had mixed reviews Helper text conveys to the user additional guidance about the input field in the SSI application, such as how it will be used (7%) • Technicians must explain relevancy of questions being asked in SSI Application (3%) • Other minor issues (3%) |

| Rounds<br>of<br>Testing | User Tester<br>Profile   | Responses   |
|-------------------------|--------------------------|---|
| 3                       | Members of<br>the public | Round three consisted of interviews with members of the public facing barriers to equitable service. Demographics included: not blind, not receiving SSA benefits, a mix of disabled and not disabled, a combination of married and not married, a blend of living with and without children, and primary education level of high school or GED.  • There were specific questions that applicants did not understand (examples: specific income terms, disability onset date, blindness, spouse questions). |
|                         |                          | <ul> <li>Some questions prompted the applicants to ask why the questions were being asked (examples: children-related and financial records questions).</li> <li>Applicants had helpful feedback concerning application design (examples: questions with content that repeated throughout, input fields, question order).</li> </ul>  |
|                         |                          | • In some cases, applicants did not know enough to easily answer a question (examples: spouse's SSN, disability onset date).  |

The agency's CX team also conducted research on the development portion of the full (Social Security/Title 2 and Supplemental Security Income/Title 16) disability claim process. We are using the findings to inform modification to the development portion of the claim process and the associated systems. A summary of the findings is included below.

- During in-person interviews with disability applicants, technicians noted unexpected back-end system errors that prolonged the interviews. For example, sometimes when a technician attempts to move forward on a page, the SSI Application screen will display 'CCE error pls try again later' and the technicians is forced to get out of the application and get back in and start over from the beginning.
- It takes a technician an average of two to three years to learn all the policies related to disability and SSI benefits.
- Employees want more digital channels to communicate with customers, like text and email, to request and receive additional forms, provide status updates, and reduce the number of phone calls.
- Employees recommend better coordination with State DDS to ensure the field office is collecting all the information the DDS needs.

3. A project roadmap and architectural design for the simplified SSI application, both for the 'eligibility' portion and 'development' portion, including its deliverables for the next two fiscal years. Please include additional details to the roadmap and architectural design if SSA plans to build separate applications based on categorical eligibility (e.g., age, marital status, history of SSI entitlement, SSDI entitlement status, etc.) or modality (i.e., internet, telephone, or paper application).

The project roadmap below outlines SSA's three-phase approach for the simplified SSI application.

| PHASE 1 iClaim Expansion for SSI  | PHASE 2 Technician Supported Modalities   | PHASE 3 Mobile First Solution  |
|---|---|--|
| 1Q FY25 Covers online applications for:  Concurrent Social Security and SSI claims  Adults 18-64 and 10 months  Individuals who have never been married  Individuals who have never filed for SSI or been named as a parent on a child's SSI record  U.S. and non-U.S. Citizens | 3Q FY25 Covers:  Adult, Aged, Child, Married, and 3 <sup>rd</sup> - party applications (including separate applications for children and adults)  Phone, in-person, and paper forms  Development process for agency technicians | 1Q FY26  Covers:  Online, mobile-first, and public-facing application mirroring phone, in-person, and paper forms  Full online disability journey developed by Customer Experience |

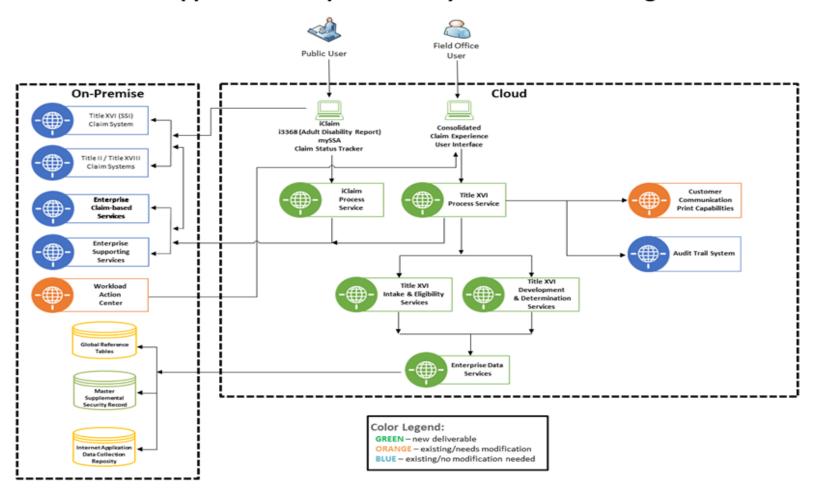
The first phase of the Streamlined SSI Application Process, targeted for the end of 2024, is to release a limited online SSI application titled iClaim Expansion for SSI/iSSI. It covers online applications for:

- Concurrent Social Security and SSI claims
- Adults 18-64 and 10 months
- Individuals who have never been married
- Individuals who have never filed for SSI or been named as a parent on a child's SSI record
- U.S. and non-U.S. Citizens

Our second phase, targeted for release in mid-to-late 2025, will include incorporating the simplified SSI questions into the technician assisted service delivery channels of in-person, telephone, and paper form. This phase includes separating adult applications from child applications, as well as streamlining the process used by agency technicians to determine eligibility. The third phase, targeted for release in December 2026, is to provide a mobile-ready, simplified, online service channel for the public to apply for SSI including a targeted focus on the underserved population. The full online disability journey will be developed using feedback from the Customer Experience team.

Below is the architectural design for the simplified SSI application.

### **SSI Application Simplification System Interface Diagram**



- 4. The title(s) of the SSA executive(s) overseeing the simplified SSI application project.
  - Chief Transformation Officer, Office of Transformation
  - Deputy Chief Transformation Officer, Office of Transformation
  - Deputy Chief Project Officer, Benefits Modernization Program Management Office (BMPMO) within the Office of Systems
- 5. The project assumption log created during project initiation (e.g., discovery documents).

The agency made the following assumptions:

- No changes will occur to the current federal statutes or regulations that govern the SSI program and its administration.
- Further review and interpretation of agency policies, relevant statutes and regulations, and their impact on the application process will be required.
- Full Office of Management and Budget (OMB) and Congressional support.
- Funding for this investment will be available in FY24 through FY26. Restricted funding may limit development and implementation.
- Continued user testing and feedback will be required for future developments and improvements.
- 6. A list of internal and external stakeholders who SSA engaged with—or expects to engage with—during the research, design, development, and implementation phase of the simplified SSI application project.

| Phases   | Stakeholders  |
|----------|---|
| Research | External  |
|          | Underserved communities (groups that have limited or no access to resources) such as individuals experiencing low-income, limited |
|          | English proficiency, facing homelessness, mental illness, and   |
|          | disabilities or blindness and their representative advocates  |
|          | Internal  |
|          | Office of Customer Experience   |
|          | Deputy Commissioner for Retirement and Disability Policy (DCRDP)  |
|          | Deputy Commissioner for Operations (DCO)  |
|          | Deputy Commissioner for Communications (DCCOMM)   |
|          | Office of the General Counsel (OGC)   |
|          | Chief Information Officer (CIO)   |

| Phases      | Stakeholders  |
|-------------|---|
| Design      | External  |
|             | Underserved communities (groups that have limited or no access to |
|             | resources) such as individuals experiencing low-income, limited   |
|             | English proficiency, facing homelessness, mental illness, and     |
|             | disabilities or blindness and their representative advocates      |
|             | Members of the Public   |
|             | Internal  |
|             | Office of Customer Experience                                     |
|             | User-Centered Design and Usability Group                          |
|             | DCRDP   |
|             | DCO   |
|             | DCCOM   |
|             | OGC   |
|             | CIO   |
| Development | Internal  |
|             | Office of Customer Experience                                     |
|             | User-Centered Design and Usability Group                          |
|             | Deputy Commissioner for Retirement and Disability Policy (DCRDP)  |
|             | DCRDP   |
|             | DCO   |
|             | DCCOM   |
|             | OGC   |
|             | CIO   |

#### 7. Frequency of feedback testing from users.

In July 2023, we completed the Adult Disability Survey, which measured the impact of implemented improvements on the customer's overall experience when applying for disability benefits and SSI. We received approximately 16,000 responses from recent disability applicants. At this time, we do not have a timeline for releasing an additional survey or any specific trigger to begin work on a follow up survey.

We are creating a new survey called the New Applicant Survey (NAS) with the purpose of learning more about individuals who apply for the DI and SSI programs, their use of services, and their experiences during the process. The expected launch date of that survey is FY25.

We also collect customer feedback from our Always-On survey, which gathers insights from customers of all agency services including disability and SSI, and feedback specific to the iClaim experience. This opportunity to provide feedback is available to customers 24 hours a day, 7 days a week.

# a. Quantitative and qualitative metrics tracked to evaluate program design and efficacy.

The anticipated outcome of Phase 1 includes the following:

- 50 percent reduction in time for customer to complete an online application;
- In combination with other agency initiatives, a reduction in the processing time for initial claim decisions for online applications from 225 days currently to 120 days; and
- Increased number of SSI applications completed online.

Metrics for Phases 2 and 3 are in development.

## 8. Projected major milestones, including transition from start-up and implementation to continuous maintenance.

The SSI Simplification initiative will remove barriers individuals face when applying for SSI by simplifying the application process and creating greater access to service through more service options. This initiative also supports the Social Security Administration's efforts in making quality initial disability decisions in an average 120 days and reducing call volumes to the national and field office contact centers. This phased initiative will provide a simplified application process for customers who apply in-person at local field offices, by telephone, or online. The SSI Simplification initiative projects will have multiple major milestones.

#### **Benefits of SSI Simplification Phase 1 Release**

- Phase 1: iClaim Expansion of SSI (planned release in late 2024) will reduce the burden for SSI applicants who are filing for disability payments, make application questions easier to understand, and will prepopulate data for authenticated individuals to streamline the application.
  - The Phase 1 Release will expand iClaim and introduce as few as 12 user-tested, SSI-specific questions across 6 screens, shaping the simplified SSI application to be launched in late 2024.
  - The new screens focusing on Income and Resource information will bring clarity to the application process based on feedback from human-centered design testing.
  - The non-U.S. citizenship exclusion for iClaim will be removed, allowing individuals from this population to submit applications online. This change has the potential to accommodate an estimated 3,600 additional SSI applications based on 2022 data.
  - General information collected from applicants, such as name, address, and disability onset, will be leveraged from their responses to Title 2 questions, decreasing requests for duplicative information and application completion time.

- To streamline iClaim, four Title 2 questions that are no longer necessary will be removed, including:
  - Other Names from the Other Names/SSNs page;
  - Best time to contact from the Contact Information page;
  - Provide permanent resident card number from the Birth and Citizenship page; and
  - Is everyone in your household applying for SSI from the Other Benefits page. (Supplemental Nutrition Assistance Program, or SNAP, question)
- Additionally, all disability applicants will now receive information on SNAP.
- With the iClaim Expansion for SSI release, we anticipate a 5% increase in online applications. Since this is our initial implementation of an online SSI application, it is crucial that we begin with a smaller sample size. This approach will help us identify areas for improvement without triggering adverse effects, such as an influx of ineligible applications being submitted to the DDSs.
- Using data analytics, User Experience Group (UXG) testing, and feedback from both advocates and agency technicians, we will gain valuable insights and refine our approach as we progress through the subsequent phases.

#### **Benefits of SSI Simplification Phase 2 Release**

- Phase 2: Technician Supported Modules (planned release in 2025) will automate internal workloads to provide employees with only actionable applications to process. Phase 2 will:
  - Encompass adult, aged, child, married, and third-party applications through the service delivery channels of in-person, telephone, and paper forms.
  - Include a development process for agency technicians.
  - Consolidate abbreviated/deferred SSI application (SSA-8001), and adult disability (SSA-3368) forms into new SSI mobile-ready and online application by December 2025.
  - In combination with other agency initiatives, reduce the processing time for initial claim decisions for online applications from 225 days currently to 120 days.
  - Reduce the number of recontacts by technicians for income and resource questions by up to 50%.

#### **Benefits of SSI Simplification Phase 3 Release**

- o Phase 3: Mobile-First Solution (planned release in late 2026) Phase 3 will establish an online, mobile-first, and public-facing system for SSI, Title 2, and other applications, replicating the telephone phone, in-person, and paper service delivery channels. Phase 3 will:
  - Employ human-centered design testing to shape the mobile-first solution.
  - Provide a mobile-ready, simplified, online service channel for the public to apply for SSI including targeted focus on underserved communities.
  - Offer secure end-to end online service to our customers

• Improve service options for members of the disabled and shut-in communities, removing the need to physically visit or contact a field office.

#### 9. Budget for the simplified SSI application project for the next five fiscal years.

For FY23, we budgeted \$6.5M to support continued discovery and execution of our SSI Simplification work. For FY24, we were granted \$25 million to fund our product for Benefits Modernization, with \$10 million allocated to the SSI Simplification effort. We have included the SSI Simplification project as part of our Benefits Modernization and regularly publish investment details on GSA's Federal IT Dashboard.