

April 14, 2025

**Office of Management and Budget**

Attn: Desk Officer for SSA

**Social Security Administration**

Attn: Reports Clearance Director

Mail Stop 3253 Altmeyer, 6401 Security Blvd.

Baltimore, MD 21235

**Re: Docket ID Number SSA-2025-0003**

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 latest collection activities.

*Request for Reconsideration—Disability Cessation*

In addition to the contemplated revisions, we urge the agency to add an option to elect Statutory Benefit Continuation (SBC) directly on the SSA-789 Request for Reconsideration—Disability Cessation form. Currently, if an individual elects SBC they must also submit Form SSA-795, Statement of Claimant or other person. This additional form increases the agency's and the respondent's burden.

The Statutory Benefit Continuation election process could be improved in the following ways, further reducing the agency's burden, providing clarity to the respondent, and streamlining the disability cessation appeal process:

- 1) Add the SBC election option to Form SSA-789;
- 2) Bring Form SSA-789 (with the SBC election option) online;
- 3) Add the SBC election language directly to the medical cessation appeal form;
- 4) Increase the allowed SBC election timeframe from 10 days to 60 days, allowing for SBC election during the entire appeal window.

*Social Security Administration Health IT Partner Program Assessment—  
Participating Facilities and Available Content Form*

We appreciate the agency's ongoing commitment to improving health information technology. We encourage the agency to continue to incentivize health partner participation through public encouragement and commendation, and by releasing the data on comparative processing times where medical records were gathered exclusively using HIT versus claims where non-HIT development was required so that providers can see the real difference that their participation makes.

Thank you for the opportunity to comment and for your consideration.

Sincerely,

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

David Camp  
Chief Executive Officer and General Counsel