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General Comment

I oppose this proposed change because it will create unnecessary and difficult hurdles for elderly and disabled Social Security beneficiaries. Elderly and disabled individuals currently can access phone services with telephonic identity verification questions that SSA admits satisfy all security requirements. This proposed change would make it incredibly difficult or impossible for elderly and disabled recipients who are not technologically savvy or don't have home internet access to access basic SSA services. We all have grandparents who we know cannot navigate computers or basic online systems much less to create or get into an online account, and navigate to appropriate sections of an online system to generate PIN codes. If their only other option is getting and driving to an in person SSA appointment, this will effectively deny them all access to services due to lengthy delays in in person appointment availability and the great distance involved for millions of beneficiaries who don't live in major cities. For just one example, I have a client who waited 2 months to get an in person appointment at an SSA office in Texas.

It could actually create a worse security risk for elderly or disabled beneficiaries to make them feel forced to use an online system that they themselves cannot navigate, because they may then ask for help from caregivers or relatives or others who would then have access to their online account details and passwords and create a risk of elder abuse or third party fraud.

SSA needs to align its services with the age and disabilities and diverse geographic locations of the beneficiaries it serves and keep telephone access fully accessible as it currently is without adding obstacles for unnecessary reasons where there is already a fully functioning system that prevents fraud & ensures the integrity our families have enjoyed for decades to access the money we've invested from our paychecks when we need it.