

Economic Policy Institute

May 9, 2025

Leland Dudek
Acting Commissioner
Social Security Administration
6401 Security Boulevard

Tasha Harley
Acting Reports Clearance Officer
Social Security Administration

Submitted via www.regulations.gov

Re: [Agency Information Collection Activities: New Emergency Request No. SSA-2025-0014](#)

Dear Acting Commissioner Dudek:

I write to submit this comment on behalf of the Economic Policy Institute. The Economic Policy Institute (EPI) is a nonprofit, nonpartisan think tank working for the last 30 years to counter rising inequality. We intentionally center low- and middle-income working families in economic policy discussions at the federal, state, and local level.

Thank you for the opportunity to comment on this proposal.

The new identity-proofing policy implemented by the Social Security Administration imposes a significant burden on claimants who have difficulty accessing or navigating the internet.

Last month, bypassing the normal review process under the pretext of an emergency, the Social Security Administration (SSA) implemented a new policy to increase the level of identity proofing needed for beneficiaries to make payment method changes by phone, including changing bank accounts used for the direct deposits. Specifically, SSA began requiring beneficiaries requesting these changes to open mySocialSecurity accounts online in order to generate new Security Authentication PINs (SAPs).

Internet-savvy beneficiaries already have the option of using SSA's online portal. This change will therefore primarily affect beneficiaries for whom the new requirement is at best an inconvenience and at worst a major obstacle to accessing benefits in a timely manner. Many beneficiaries lacking internet access or digital proficiency will be forced to make in-person visits to SSA field offices to process what until now had been straightforward phone transactions.

Many beneficiaries will be forced to travel to distant and understaffed field offices.

Many elderly and disabled beneficiaries have mobility issues that can make visiting field offices a major challenge, especially given current long wait times simply to schedule an appointment. The Center on Budget and Policy Priorities has documented that millions of beneficiaries live 45 miles or farther from the nearest field office,ⁱ and field offices have been overwhelmed by worried claimants after staffing cuts and other harmful actions taken by this administrationⁱⁱ caused long delays and service interruptions.ⁱⁱⁱ Requiring millions more beneficiaries to schedule in-person visits only exacerbates an already dire situation.

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SSA asserts the need to implement the new policy on an emergency basis without providing evidence of large-scale fraud.

The April 25, 2025 “Emergency Justification Letter” from SSA Deputy Commissioner Dustin S. Brown to Jeffrey Clark, Acting Administrator of the Office of Information and Regulatory Affairs at the Office of Management and Budget, does not provide any evidence of an emergency that would justify the immediate implementation of the new regulation.

The letter does not establish that fraud is a significant or growing problem, simply stating that “about 42% of all direct deposit fraud is phone-based.” However, if more than 42% of direct deposit changes are processed by phone, this statistic would suggest that phone transactions are relatively safe. In fact, the available evidence *from SSA* suggests that direct deposit fraud is extremely rare, on the order of \$100 million a year, a tiny fraction of the roughly \$1.6 trillion^{iv} SSA pays out annually in benefits.^v

SSA has protocols for establishing a caller’s identity over the phone. Prior to recent actions taken by this administration, the agency also had an excellent track record of protecting personally identifiable information (PII), including bank account information required for the direct deposit of benefits.

The potential for fraud is undoubtedly greater since the administration gave improperly vetted members of the Department of Government Efficiency (DOGE) unrestricted access to PII.^{vi} There is now a legitimate concern that DOGE actions could cause PII to be leaked^{vii} or used for purposes not intended by Congress, such as identifying immigrants ^{viii} [REDACTED]. However, the way to address this very real risk is to restore longstanding protocols for restricting internal access to PII in Social Security databases, not forcing millions of elderly and disabled beneficiaries to travel long distances to overwhelmed field offices in order to process simple transactions.

We urge you to withdraw this policy and avoid putting additional economic and administrative burdens on seniors, people with disabilities, and other claimants.

Sincerely,
Monique Morrissey
Senior Economist
Economic Policy Institute

ⁱ Kathleen Romig, [Abruptly Eliminating Social Security Phone Services Threatens Access to Benefits](#), Center on Budget and Policy Priorities, April 8, 2025.

ⁱⁱ Consortium of Constituents with Disabilities, [letter to Senate Finance Committee](#), March 20, 2025.

ⁱⁱⁱ Lisa Rein and Hannah Natanson, “[Long waits, waves of calls, website crashes: Social Security is breaking down](#),” *Washington Post*, March 25, 2025.

^{iv} Social Security Administration (SSA). 2025. “[Social Security Fact Sheet](#).”

^v Emily Peck, “[DOGE Social Security plan targets small fraud at possible high cost](#),” *Axios*, March 20, 2025.

^{vi} Lisa Rein, “[Former Social Security official describes hostile takeover by Musk team](#),” *Washington Post*, March 10, 2025.

^{vii} Celine McNicholas and Ben Zipperer, “[Trump is enabling Musk and DOGE to flout conflicts of interest](#),” Economic Policy Institute, May 7, 2025.

^{viii} Hannah Natanson, Joseph Menn, Lisa Rein and Rachel Siegel, “[DOGE aims to pool federal data, putting personal information at risk](#),” *Washington Post*, May 7, 2025.