

# PUBLIC SUBMISSION

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**Docket:** SSA-2025-0123

Agency Information Collection Activities: Proposed Request and Comment Request

**Comment On:** SSA-2025-0123-0001

Agency Information Collection Activities: Proposed Request and Comment Request

**Document:** SSA-2025-0123-DRAFT-0002

Comment from Anonymous

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## Submitter Information

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## General Comment

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20 CFR 401.45 b.1 allows an individual in person without documentation to certify in writing that they are the individual they claim to be. In the description of the SAP process, the note at the end states that if the individual does not "wish to create an account, the technician directs the respondent to find acceptable identification documents and return to the field office to present them in person". This is contrary to the existing CFRs that allow an individual to attest to their identity in writing.

There are other ways to change a beneficiary's address and/or direct deposit information. Many of the paper forms i.e. SSA-1020, SSA-1026, SSA-455, etc. provide a check box to alert for a change as well as room to write the updated information. The changes are made by a technician without any contact with the beneficiary or their payee. Once the address is changed, it can then be used to confirm identity on the 800#. Submitting the change of address or direct deposit information via paper forms provides a work around to the proposed SAP. It is a security gap in the process.

The dedicated link provided in the proposed rule is not secure. It is not https but only http and may be blocked by some internet providers or vpn layers if that is the format used in the SAP protocol.

The proposed process still relies on MFA to log into the mySSA accounts through login.gov or id.me. The additional layer of SAP will be confusing to beneficiaries.

The text messages received for MFAs clearly state that "XXXX will NEVER call or text you for this code. DON'T share it." The process for SAP contradicts those guidelines and strongly suggests to the beneficiary that the SAP process may be fraudulent.

Adding the SAP layer now requires callers to have three electronic devices. Their computer, their phone, and now access to text messages. Really? Can you make it any more complicated? And what if the caller has trouble with login.gov or id.me? Will SSA then direct them to the 3rd party help desk to then be redirected back to SSA?

If callers cannot provide the SAP code will their accounts be flagged as possible fraud? That is unclear.