



Disability Law Center

<http://www.dlc-ma.org> • mail@dlc-ma.org

Main Office
11 Beacon Street, Suite 925
Boston, MA 02108
617-723-8455 | 800 872-9992 Voice
617-723-9125 Fax

Western Massachusetts Office
32 Industrial Drive East
Northampton, MA 01060
413-584-6337 | 800-222-5619 Voice

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Submitted via regulations.gov

To whom it may concern:

Re: Agency Information Collection Activities: No. SSA-2025-0123

I submit these comments on behalf of the Disability Law Center (DLC). The DLC is the Protection and Advocacy organization for Massachusetts. DLC provides free legal services to people with disabilities statewide. A key mission of the DLC is to help ensure that people with disabilities can access needed services to live and work in the least restrictive setting in their communities. Access to disability benefits and the associated medical coverage is crucial to many to achieve this goal. The undersigned staff the Disability Benefits Project, which provides back-up and support to legal services advocates statewide. We have decades of experience with the Social Security Disability determination and appeals processes and comment on behalf of those we serve.

My comments concern the burden estimates for the Continuing Disability Review (CDR) Report and the Security Authentication PIN (SAP). My overarching comment is that the completion burdens for both have been underestimated.

1. Continuing Disability Report Form

The burden estimate on completing the SSA-454, Continuing Disability Review Report, is 600 minutes. I have spoken to many people over the years to explain notices they have received from Social Security and the forms that they need to complete and can say that 600 hours is an underestimate for many of those who will need to complete SSA-454. The form is 12 pages long and requires a lot of reading and information gathering. I appreciate that the form has been improved over time to include simpler language and clearer instructions and explanations, e.g., questions #3.G., #6, and #8 in the June 2023 version. Nevertheless, the form is still a lot for many to get through, understand and manage answering all the questions, and gather all the information required. Just getting the info about appointments, and provider names and addresses for the 12-month period can be a heavy lift, especially for those unable to keep good records. Fear, anxiety, and lack of stamina can also impede the ability to read, understand and answer all the questions. I find many people need to ask questions, confirm their understanding of the questions, and otherwise be supported in the process. This level of support is generally not quickly and easily available.

In addition, SSA gives beneficiaries only 10 days to complete and return this form. This is a very tight deadline for many to review the lengthy form, get the support they need, and obtain all the information needed to complete it. Thirty days would be a much more reasonable deadline for completing this long and detailed form.

2. Security Authentication PIN (SAP) Process

As of July 18, 2025, SSA's plan is to expand SAP use to the following: generating a Benefit Verification Letter; obtaining a Tax Statement; changes of address; and requests for claim status. The burden estimate for use of the SAP process does not adequately take into account the burden it will place on those with limited internet and digital access, those living in low-income or rural communities, and those with mobility limitations or no transportation.

As described in the federal register publication of SSA-2025-0123, the SAP process is a multi-step process requiring reliable internet service and the ability to implement the steps. Many people in the vulnerable communities served by SSA may lack such access or the ability to get through the process. People who cannot get through the process on the phone and cannot make a timely appointment at their Field Office – or – cannot get to their Field Office – may lose other benefits that require SSA benefit verification – or – miss out on SSA benefits if they cannot timely change their address. SSA staff will be burdened by increased phone and in-person visit and wait times, at a time when half a million people, many likely low tech, will need help changing from paper checks to direct deposit.

I appreciate that SSA needs to take reasonable steps to protect its customers from fraud, but those steps must not create lack of access to SSA's services and benefits for those who need and rely on them. In addition, SSA has not provided data demonstrating any significant fraud in providing the services for which SAP use is proposed. There should be a low-tech pathway for people to timely access these services in order to minimize the burden.

Thank you for this opportunity to provide feedback on these issues.

Respectfully Submitted,

Linda Landry
Disability Law Center
11 Beacon Street, Suite 925
Boston, MA 01908
617-315-4611