



Mental
Health
Project



September 19, 2025

Submitted via www.regulations.gov

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

Dear Commissioner Bisignano:

These comments are submitted on behalf of the New York Legal Assistance Group (NYLAG), the Urban Justice Center's Mental Health Project (UJC), and Empire Justice Center.

NYLAG is a leading civil legal services organization combatting economic, racial, and social injustice by advocating for people experiencing poverty or in crisis. Our Public Benefits Unit advocates for low-income families, children, veterans, the elderly, Holocaust survivors, those living with disabilities, and other vulnerable populations to have access to the public benefits to which they are entitled.

The Urban Justice Center's Mental Health Project started in 1994 as a foundational project of the Urban Justice Center (UJC) and its mission today is to disrupt and dismantle the cycle of hospitalization, homelessness and incarceration that traps low-income individuals with mental health concerns in New York City. UJC provides a range of services to low-income individuals with mental health concerns, including representation before SSA in appealing the denial of disability benefits.

Empire Justice Center is a statewide not-for-profit law firm. Its mission is to protect and strengthen the legal rights of poor, disabled, or disenfranchised people in New York through systems change advocacy, training, and support to other advocates and organizations, and high quality direct civil representation. As part of our mission, we represent numerous low-income individuals with disabilities before

SSA under our Disability Advocacy Program (DAP) in both disability and non-disability eligibility matters. In addition to providing direct representation to individual New Yorkers, Empire Justice provides technical assistance and support to DAP providers across all of New York State.

Thank you for the opportunity to comment on this proposal regarding the Security Authentication PIN (SAP). We endorse the comments submitted by the Consortium for Constituents with Disabilities (SSA-2025-0123-0004). We offer the following comments related to the SAP based on our experience with our clients and their capacity to use and access to the relevant technologies discussed in this proposal. Our practices exclusively serve individuals with little or no income; to be eligible for DAP representation their income cannot exceed 200% of the Federal poverty guidelines. We welcome the use of technology to further efficiencies and the SSA customer service experience generally, and we appreciate that SSA continues to prioritize customer experience and services. We hope SSA will also continue to make services accessible to individuals who cannot easily navigate technology, or who may lack adequate access to digital services due to circumstances related to their age, disability, poverty, or other limitations.

SSA underestimates the burdens related to the Security Authentication PIN (SAP).

We are concerned that the Security Authentication PIN (SAP) program will impose an unreasonable burden on claimants who need to solicit SSA's services, in particular older adults and people with disabilities, who face barriers using the telephone, accessing technology, and/or face obstacles traveling to a field office because of their age, disability, geography, poverty, or other circumstances.

SSA estimates it will take an average of 8 minutes for most individuals to learn about the SAP process from a representative when they are trying to do business with SSA over the phone or in person, receive and understand instructions, gather the data and documents needed, answer the questions required and schedule any follow up. Moreover, SSA estimates that the wait time for this interaction will be only 14 minutes. The entire process will be far more time-intensive even for tech-

savvy members of the public. This is especially true in cases where the individual calling does not already have a MySSA account set up to receive a SAP.

This proposal significantly underestimates the overall wait time to connect with someone at SSA and generate an SAP. The average call wait time varies but it can be extensive. Moreover, many callers get a pre-recorded message that the lines are too busy, or have their call disconnected after they have already waited on hold. Some customers ask for a call back and usually wait a significant period of time to receive one. While waiting for a call back may be more convenient than waiting on the line, for many, the time they are waiting for a call back is still time they cannot take on other tasks so as not to miss the call. Thus, SSA's estimate that the wait time will be 14 minutes is a vast underestimate.

We appreciate that SSA has taken steps to ease the burden of generating these PINs by promising to offer vanity URLs to help customers navigate directly to the page within their MySSA account. These vanity links may be useful to the small subset of SSA's customer base who have a MySSA account and the ability to navigate their account, as well as the ability to access whatever process SSA uses to send that link to them. Even for those with MySSA accounts, it is unlikely that 8 minutes is sufficient to communicate these rules, then find tech (phone or computer) to access the vanity URL, follow it, collect the data, and respond. The ability to do this requires having access to tech and internet, remembering their MySSA account information, the ability to receive the link from SSA, the ability to see and/or hear text on the screen, and the hand dexterity to follow the link to access the generated SAP. We would recommend that SSA engage in disability-inclusive user testing to assess the actual impact of this process on end users before it is rolled out.

SAP Process Will Significantly Burden Claimants without MySSA Account and/or Who Have Low-Tech Literacy.

Individuals who need to contact SSA about this information are disabled or elderly. They do not all have smart phones, stable and private internet access, or the technological know how to navigate the new ID system. It is not unusual for our clients to lack working email addresses, one of the basic requirements for setting up an account. The steps required to set up an account to access SSA's new PIN are beyond the capabilities of many recipients. It may be cliché to joke about elderly

parents who don't understand basic technology, but the struggle is all too common. As technology advances, we must make sure we do not leave behind important populations. In our experience, it is the people who lack access to technology or internet, or have low tech literacy, who choose to do business with SSA over the phone. Eight minutes is a significant underestimate for members of the public who do not have MySSA accounts, and/or the ability to skillfully access them.

SSA's request for comments acknowledges that the process is demanding for many people: "[T]he process of creating or logging into a my Social Security account requires the respondent to submit several pieces of identifying information (such as an email address, a password, selecting a multi-factor authentication method, and completing identity proofing, which entails uploading an ID and taking a selfie) to both sign up or login using ID.me or Login.gov." 90 Fed. Reg. 34327.

Setting up identification through ID.me or Login.gov is not a simple intuitive process. Set up through Login.gov can require verification via mail as part of the multi-part authorization process if the individual does not have a cell phone.¹ Set up through ID.me and Login.gov requires an unexpired government-issued ID like a driver's license, state ID, or a passport. A recent applicant tried to set up a MySSA account for retirement benefits. Halfway through the ID process he had to quit because he didn't have a current ID since he rarely travels. He doesn't know when he'll have time to go in person to SSA since he works during business hours and, in the meantime, he isn't receiving benefits that he is eligible for.

There are various other technical hurdles that seem simple but aren't simple for the populations we serve. Not all of our clients know how to take and upload a picture with their phone or how to access video chat if the photo upload doesn't work. The elderly and disabled population may forget passwords more often than other general populations, and the SSA blog post has lists of the multiple steps necessary to change a password if a password is forgotten.² Individuals who need to access a MySSA account after losing a cell phone or changing a phone number, another common occurrence, are directed by SSA's website to the help centers for ID.me or

¹ <https://www.login.gov/help/verify-your-identity/verify-your-address-by-mail/>

² <https://blog.ssa.gov/are-you-having-difficulties-accessing-your-personal-my-social-security-account/>

Login.gov.³ Directions to add a phone number to an account require access to the prior authentication method, usually the lost cell phone. Adding a new phone number without access to the lost cell phone is even more complicated. Every person that can't overcome these hurdles will have to go into the field office instead.

In SSA's Statement for Emergency Paperwork Reduction Act Approval For: my Social Security–Security Authentication PIN (SAP), OMB No. 0960, SSA explains that while the burden estimate of creating or logging into a my Social Security account is described under another OMB control number, this approval is meant to be “inclusive of the increased burden associated with either (1) generating an SAP through my Social Security to complete the direct deposit transaction over the phone; or (2) traveling to the field office because the respondent is unable to create a my Social Security account or otherwise unable to generate an SAP.”

For people who have limited access to tech or low-tech literacy, it will take them far more than 8 minutes to obtain an SAP. If they cannot, SSA estimates that they will face a burden of 2 minutes. While it may only take 2 minutes for an agent to figure out if someone does not have an account, that is not an accurate estimate of the burden this proposal would impose on people needing SSA's services. A recent account creation for ID.me with a tech savvy individual took 45 minutes including the wait time necessary for a video chat. The video chat was needed because the individual's phone could not be authenticated since it was on a family plan and not in his name. However, the reason it could not be authenticated was not provided when the photo ID was denied so we went through the whole process uploading the photo ID a second time before reverting to the video chat option. When the time it takes to create a MySSA account is added into the estimate, then the whole process will likely take hours. If someone is told to create an account and call back, even excluding the time it takes to create an account, this notice does not seem to contemplate how it will also take time for that claimant to reconnect with a claims representative. Keep in mind that many low-income individuals have limited cellular minutes each month, and this kind of requirement can drain minutes or a person may not be able to finish if the minutes run out.

³ <https://www.ssa.gov/faqs/en/questions/KA-03217.html>

SSA's Requirement for In-person ID Verification is Burdensome.

Absent the ability or willingness to use an SAP, this policy requires claimants to undergo identity verification in person. While we appreciate SSA maintaining an in-person identity verification option, it must be acknowledged that this can be a very burdensome process for people needing access to SSA's services. This policy is estimated to drive 2 million more in-person visits to Field Offices.² Going to SSA in person is time-intensive and will take much longer than the 2 minutes this proposal estimates. Most in-person appointments require making an appointment, gathering the appropriate documents, traveling to a Field Office, and waiting for service. A Center on Budget Priorities analysis shows that more than 6 million people live more than 45 minutes away from a local Field Office.⁴ Each visit could require more than 90 minutes in just travel time, without taking into account the extensive wait time to meet with a representative.

This process may be nearly impossible for those with limited funds, significant mobility limitations, or demanding personal commitments, such as existing medical appointments or family caregiving. If SSA requires an appointment for ID verification in person, then the time it takes to make a change to direct deposit information could be 30 days or more. During this time, the individual would not get benefits and SSA could end up sending benefits to the wrong account, which could lead to a bounce back of funds, and a request for a reissuance of benefits – a labor intensive process that involves the Treasury.

These ID Verification Procedures Impose an Additional Barrier to Benefits Access.

The proposed change appears to require a current ID to access SSA benefits via direct deposit. This is an additional unnecessary hurdle in the eligibility process that could block thousands of recipients from accessing their benefits. Effective June 7, 2025, Login.gov and ID.me are now the only sign in options to access Social Security online services.⁵ Both methods require the individual to show a current ID.

⁴ Center on Budget and Policy Priorities, *Restricting Phone Services for Social Security Will Harm Seniors*, April 8, 2025, <https://www.cbpp.org/research/social-security/restricting-phone-services-for-social-security-will-harm-seniors> (noting that more than 6 million people live more than 45 miles from a Social Security field office, with travel times often exceeding 45 minutes, particularly in rural areas).

⁵ <https://www.ssa.gov/myaccount/account-transition-faqs.html>

Verification with ID.me can't be completed with a photo if the cell number being used isn't in a phone plan under the individual's name. For someone on a family plan, a video call will be needed to verify ID. On the video call, the individual will need to show two primary ID documents or one primary and one secondary document. Many individuals, including homeless individuals and older adults, do not have current ID. An alternative method of changing direct deposit information must be made available for individuals with no current ID. For example, we recently spoke with a SSI recipient who had her benefits transferred to a skilled nursing facility after a stroke. When she was released home, she had to contact SSA by phone to change the direct deposit information from the facility's account back to her bank account. She does not have a current ID and cannot go in person to obtain an ID due to significant weakness post stroke. Therefore, she cannot complete the ID requirement with ID.me. Going to the SSA office in person would also pose a hardship, and she wouldn't have an ID to show an in-person representative anyway.

SSA Should Create More Pathways to Identity Verification to Minimize the Burden.

For SSA to meet the diverse needs of its customer population, including people with disabilities and the elderly who may struggle both with mobility and with accessing and navigating online tools, we recommend SSA add additional pathways for identity verification or make SAP optional for all services. NIST guidance recommends that SSA should offer as many pathways as feasible when implementing new verification processes to ensure the greatest number of claimants can complete the verification steps. For example, SSA should consider offering an alternative option that does not require the user to have access to and be able to use a computer or smartphone. NIST endorses sending six-digit confirmation codes through the mail for identity authentication, and this process is used in some state employment insurance programs. There are existing examples of this approach at the federal level, including for identity verification through Login.gov. SSA should consider a similar option, which is low-tech but does not require a current ID or in-person appointments, for identity verification.

The SAP proposal is not calibrated to meet SSA's goal of mitigating fraud concerns and it is not a practical response to the low level of fraud related to these phone

services. The SSA OIG reports that SSA thwarts most direct deposit fraud before any inappropriate payments are made.⁶ Considering SAP PINs are a great burden on many individuals, it is not clear that such a large burden is warranted related to fraud activity that impacts few. Nor is it cost-effective, given the small percentage the fraud represents and the added time and cost to both SSA employees and the public. It is unclear whether asking individuals to provide an SAP PIN will prevent any fraud that would not have already been prevented through the normal course of business, but it will provide significant stress to consumers and delay for those who do not have MySSA accounts and who struggle to access in-person appointments.

Moreover, implicitly pushing more people to apply online, as this change would do, could actually increase fraud, since more fraud occurs online than over the phone or in a face-to-face meeting in a Field Office.⁷ For example, an individual recently tried to set up an account with ID.me but one of the links on the site took him to a page that was blocked as potentially malicious. The individual was concerned for the safety of his data and had to set up the ID.me account through other means. Another concern is the addition of other people to this process to help people who cannot navigate the tech necessary for ID verification. Each person added to the process is a potential point of fraud impact. For example, a field office told a representative in August 2025 that claimants can only provide direct deposit changes in person unless they are bedbound. If they are bedbound, the representative was told that SSA will do a video interview to verify identity before they can provide direct deposit information by phone. SSA will send a link to join a video chat. If the individual does not have the technology or the know how to do a video chat, SSA said they needed to get a family member or home health aide to assist.

⁶ Social Security Administration Office of the Inspector General, *SSA Beneficiaries Did Not Always Authorize Direct Deposit Changes by Telephone Leading to Direct Deposit Diversions*, September 9, 2025, <https://oig.ssa.gov/news-releases/2025-09-09-ssa-beneficiaries-did-not-always-authorize-direct-deposit-changes-by-telephone-leading-to-direct-deposit-diversions/> (noting that SSA has revised its policies to strengthen identity verification and reduce the risk of unauthorized direct deposit changes, and that most fraud is intercepted before payments are misdirected).

⁷ Social Security Administration Office of the Inspector General, *OIG Quarterly Scam Report – Issue 12*, January 1–March 31, 2024, <https://oig.ssa.gov/assets/uploads/quarterly-scam-report-issue-12.pdf> (noting that the SSA OIG receives the majority of Social Security-related scam allegations through its online reporting form, reflecting the prevalence of online fraud relative to other channels).

Security Authentication PIN (SAP) Should be Optional for Any Use.

SSA also indicated that “the agency has determined further need to expand the use of the SAP process for other telephone transactions. Specifically, we will use the SAP process for the following additional telephone services: 1) Generating a Benefit Verification Letter; 2) Obtaining a Tax Statement or replacement Form 1099; 3) Change of Address; 4) Request for Claims Status.” The agency estimates that 3,455,360 respondents will decline to use SAP and will visit a field office for in-person identity proofing, equating \$58,138,131 in total annual opportunity cost. This is an immense and unnecessary burden that will significantly disadvantage those with limited internet and digital access, those that live in rural communities, and those who have transportation or mobility issues.

The agency has not produced data demonstrating that seeking a claim status, updating an address, or requesting a benefit verification letter or tax statement have resulted in any significant fraud. Yet, SSA is requesting to move forward with this SAP process that will increase the backlog of cases, will increase phone and in-person wait times, and will bog down an already time-strapped agency workforce.

Subsequent to the issuance of this proposal, SSA indicated that it had removed the SAP PIN policy and made it optional; though reporting indicates that internal policies instruct employees to seek out the SAP PIN if callers want to change their direct deposit information. We applaud SSA’s flexibility in responding to feedback on the onerous nature of this plan, and request that SSA update internal guidance to make SAP optional for any use.

We also want to flag that, since the date of the Emergency Request, additional agency policies have been proposed that will make the implementation of the SAP policy even more obstructive to the low-tech client population. Specifically, we are concerned by the agency’s move away from paper checks. SSA announced an intent to stop issuing paper checks beginning September 30, 2025. By limiting access to paper checks, all recipients currently receiving paper checks will be required to update SSA with their direct deposit information, which will now be harder to accomplish due to the new SAP policy.⁸

⁸ Some media reporting suggests that SSA may be changing the proposed requirement that claimants use electronic banking. We strongly support SSA continuing to issue paper

The same customer base that struggles with electronic banking will likely struggle with the SAP policy, which requires them to have and be able to use an electronic MySSA account to provide SSA with a six-digit PIN. The combination of these policies is burdensome—both to those the agency is tasked with serving, and to the employees seeking to serve the public. We are concerned that in many cases the combination of these policies will obstruct low-tech beneficiaries from receiving their benefits. Many individuals who can no longer receive paper checks will be unable to handle the steps needed to update SSA with new banking information.

Moreover, by eliminating paper checks, SSA will drive almost half a million people to SSA to try to update their account information. Because many of the people who cannot or will not use electronic banking will also lack a MySSA account, most of these individuals will have to go to a Field Office in person to update their direct deposit information. In the best case scenario, this will cause an increased workload burden for the agency and the beneficiary. In the worst case scenario, beneficiaries will not receive their benefits.

We are particularly concerned because SSA's SAP policy does not contemplate a low tech option for individuals who struggle to get to a field office for in-person service. SSA should create a low-tech pathway for beneficiaries seeking to change banking information over the phone that does not require the individual to have a current ID.

More Information is Needed to Assess the Impact of SSA's SAP Policy.

We believe the questions below are important to answer to understand why SSA is implementing this policy and whether this policy appropriately balances the benefits and burdens.

- What fraud is SSA trying to prevent? What is the extent of this fraud? How many people are impacted?
- What steps is SSA already taking to prevent direct deposit fraud via other methods?
- What support will SSA provide to consumers who need help creating or accessing mySSA accounts? How will SSA tailor their support to the disabled community?

checks. In the least, the agency should consider allowing paper checks for the beneficiary's first benefit check as many banks require minimum funds to open accounts, and many beneficiaries rely on that first check to open accounts—an impossibility if they never receive a paper check. We encourage SSA to keep paper checks as an option for claimants who need them.

- How would the SAP policy apply to parents or caregivers who are helping to navigate Social Security benefits to survivors or children with severe disabilities?
 - Would parents be able to use their personal mySSA accounts to generate a SAP to make changes over the phone to their child's account?
 - If a parent or caregiver is unable to navigate the SAP process, what would in-person verification look like? Would the child beneficiary be required to go in person? Will field office hours outside of normal business hours be available for working parents?
- How will SSA handle individuals who need to do in-person identity verification?
 - Will people needing to verify their identity need to schedule an appointment or will they be seen on a walk in basis?
 - Will identity verification be an exception to the policy requiring appointments?
 - How many individuals will be impacted by the SAP policy annually?
- Has SSA assessed whether teleservice centers can handle increased call volume for people seeking to schedule field office appointments for identity verification, if appointments are necessary?
- Has SSA assessed whether Field Offices can handle the increased traffic caused by individuals seeing identity verification?
- The supporting documents indicate that someone can get a good-cause exemption from the SAP process in “extreme dire-need” situations.
 - What constitutes “extreme dire-need” for SSA purposes and for the purposes of exemption under this proposal?
 - If the use of SAP is not optional, then the dire-need examples provided in policy guidance should be extensive and applied liberally for individuals who allege mobility issues, tech issues, or inability to travel to their local Field Office due to limited finances or for any reason. Any individual who faces benefit cut off due to the inability to navigate the SAP process should be considered to be in dire-need.
 - Is SSA planning to promulgate POMS or EMs defining extreme dire need and/or how it relates to a “dire need” circumstance as described in POMS DI 23020.030?
- What is SSA's policy for identity documents required for the identity verification process in field offices? What elements must be documented and what documentation will be required for verification?
- Many elderly and mobility impaired individuals do not have current government-issued IDs because they have not renewed them after expiration. How will SSA make sure that these eligible individuals receive the benefits they are entitled to if they do not have a current ID?
- If someone is unable to verify their identity through this process, is there an appeals process? If so, what will the appeals process entail and who will

oversee it? Will there be a process that allows benefit continuation during the appeal?

- How will direct deposit changes be done in person for someone with a payee? Will the beneficiary have to come in with the payee for ID verification purposes?
- Has SSA performed a cost-benefit analysis that assesses the number of people negatively impacted by identity-related fraud versus the number of people negatively impacted by the PIN requirements? What were the results of this analysis?

Respectfully,

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