

Hearing on SSA Customer Service  
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Committee on Ways and Means, Subcommittee on Social Security  
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Thank you for this opportunity to discuss the critical importance of the Social Security Administration, the programs it administers, and its customer service to the public.

I am Tracey Gronniger, Director of Economic Security at Justice in Aging. Our organization is committed to using the power of the law to advocate for the rights of low-income older adults. We focus particularly on those groups that have traditionally lacked legal protection, including women, people of color, LGBTQ+ individuals, and people with limited English proficiency.

Today I'd like to talk to you about the importance of the Social Security Administration and the customer service it provides to ensure that older adults and people with disabilities have access to key programs that provide them with the income support they need to pay for essentials like housing, food, clothing, and other necessities.

SSA Programs Support the Economic Security of Older Adults at Risk of Poverty

The programs that SSA administers, including Social Security retirement, spousal, and survivors benefits; Social Security Disability Insurance (SSDI); and Supplemental Security Income (SSI) are incredibly important to the low-income older adults and people with disabilities that Justice in Aging advocates for. Approximately 50 million people age 65 and older received Social Security benefits this year. Without those benefits we would see millions of seniors living in poverty.<sup>i</sup> For older adults with the lowest income and resources, SSI serves as a key lifeline to keep them from falling into deep poverty, homelessness, and hunger. Almost half of all SSI recipients are age 50 and older, and almost 30% of all SSI recipients are over age 65.<sup>ii</sup> For approximately 2.3 million seniors over age 65 around the country, SSI is a vital source of support.

Women make up a majority of Social Security and SSI beneficiaries. For low-income older adult women, these benefits are crucial, and over 60% of older adult SSI recipients are women.<sup>iii</sup> This is partially a result of the undervaluing of work that women have historically performed, the low-wage jobs that they are more likely to work in, and the caregiving roles they often assume on an underpaid or unpaid basis.<sup>iv</sup> Indeed, Social Security and SSI benefits are necessary to address and counteract some of the effects of systemic discrimination that can often lead to certain groups of older adults aging into poverty through no fault of their own. Black, Latino, and Native American older adults, for example, are twice as likely to live in poverty as white older adults.<sup>v</sup>

LGBTQ older adults are also more likely to live in poverty.<sup>vi</sup> Unfortunately, as they age, older adults become even more likely to live in poverty, with those age 80 and over having the highest poverty rate of all older adults.<sup>vii</sup> And those older adults living alone, oftentimes women, are at the highest risk of poverty.<sup>viii</sup> Programs like Social Security and SSI work to ensure that all older adults will be able to meet their basic needs.

### SSA Needs Adequate Funding to Improve Customer Service and Address Challenges that Make It More Difficult for Older Adults to Access Benefits

SSA plays an important role in supporting the economic security of our nation's people, especially older adults and people with disabilities. Despite the relief that Social Security and SSI benefits can provide, we still see significant levels of poverty among older adults. Many seniors who are eligible for programs like SSI may not be aware of the program, or may need assistance understanding when and how to apply for benefits from SSA.<sup>ix</sup>

This is where SSA's customer service role becomes critically important. The agency serves as a resource to individuals by providing information, answering questions, interpreting complicated rules and requirements, translating information into languages other than English, and generally providing the support people need to access benefits for which they are eligible.

When the agency closed its doors to in-person service in March of 2020 due to the Covid-19 pandemic, some of the groups most affected included older adults and people with limited English proficiency who are particularly reliant on in-person services. The loss of in-person services led to an estimated 500,000 fewer awards of Social Security or SSI disability benefits since the pandemic than would otherwise have been expected.<sup>x</sup>

While we are excited that the agency has reopened its offices after a long period without walk-in, in-person services during the pandemic, it is not just the office closures from the pandemic that have made it difficult for SSA to perform its duties to the people of this country. There are longstanding challenges and issues that have impacted the agency's ability to provide effective and efficient customer service to the public, and have created barriers to access for those most in need of the income support offered through the programs the agency administers. Below, I discuss some of the key customer services that SSA provides and how they might be improved so that older adults and people with disabilities are better able to receive assistance from programs like Social Security.

Before I turn to specific customer service issues however, I must note that one vital and overarching challenge that the agency faces, which affects every aspect of its customer service is a woefully inadequate level of funding. SSA has been chronically underfunded for over a decade, forcing the agency to cut corners in the level of service it provides. With the number of older adults growing every year as the Baby Boom generation ages, the Social Security Administration has seen an operating budget that is down 14% since 2010, after accounting for inflation. Without adequate funding, we cannot expect SSA to provide the level of service we desire for the older adults who depend on the agency to help them access these critical income supports.

We urge Congress to commit sufficient administrative funding to SSA, so that it will have the resources necessary to hire the staff it needs to serve the public and make the kinds of changes and improvements to customer service that will ensure that older adults can effectively access and utilize the benefits available to them to support their economic security. For Fiscal Year 2023, SSA has requested \$14.8 billion for SSA operating expenses, an increase of \$1.4 billion or about 11% over Fiscal Year 2022 enacted levels. We support at least this level of funding.

### In-Person Services Are a Vital Part of SSA's Customer Service

To speak more specifically to SSA's customer service, I would like to touch on a few areas that are critical to ensuring that SSA provides the assistance necessary to meet the needs of older adults and people with disabilities who depend on the vital programs that the agency administers. I would like to discuss the importance of in-person services, SSA's outdated telephone technology, the need to simplify online access and basic forms, and needed outreach by SSA to underserved communities.

The first area I'd like to discuss is the in-person service provided by SSA staff through the agency's 1200-plus field offices around the country. In-person, walk-in services are essential for older adults, and in particular low-income older adults who have limited access to the internet. One advocate told us of an older adult client who spent months trying to navigate the process to start receiving payments related to his benefit approval. The advocate and his client, who was housing insecure, tried using SSA's phone services to get assistance from multiple SSA offices with no success. When they were finally able to go into an SSA field office in person, however, they were able to accomplish in 45 minutes what they could not achieve after hours on the phone. In one visit, a knowledgeable claims representative processed his paperwork, and was also able to get him a notice of benefits to accompany a housing application he was preparing to submit. As the advocate noted "It was simply incredible how helpful it was to go in person with him."

Another organization in Oregon told us of an older adult who was experiencing chronic homelessness after a traumatic brain injury that made it incredibly difficult for him to understand and retain information. Phone calls with SSA to find out about how to file for early retirement were difficult, and the client often had trouble remembering who he was talking to and the purpose of the call after just a few minutes. Had he been able to meet in person, a claims representative would have been able to provide him with written information about filing for early retirement that the client would have been able to refer to later and understand.

Going to a field office in person offers people access to the widest range of services as compared to going online or calling by phone. Field office staff are generally able to help individuals right away, particularly if they have an urgent need. For those people who speak languages other than English or have disabilities that require particular accommodations, an in-person visit is often most effective.

While online access can be helpful and important to some, a recent study from Older Adults Technology Services found that 42% of older adults lack internet at home.<sup>xi</sup> Unsurprisingly, some of the predictors of lack of internet access were level of education and income level, race,

living in rural areas, and poor health status.<sup>xii</sup> As one advocacy organization told us, it is unrealistic to expect a person experiencing homelessness to use a computer at the public library to undertake the often-Herculean and hours-long effort of applying for benefits. The difficulty that some older adults face in accessing the internet means that SSA must offer a reliable in-person option as an alternative to online and telephone services. For people with limited English proficiency, this also includes interpreter services that take into account the languages spoken in the community in which a field office is located. Even prior to the pandemic, advocates were concerned about the closure of field offices in low-income areas, and in communities of color. Such closures are especially problematic for people applying for SSI, who frequently need to go to an SSA office as part of the process.

With the closure of all field offices during the pandemic, the problems that had already been identified were only exacerbated, and people who previously had trouble communicating with SSA found it next to impossible. And the closures led to a sharp decline in SSI applications for older adults and people with limited English proficiency.<sup>xiii</sup> We are thrilled that SSA has generally reopened its field offices to walk-in, in-person services. We also understand that the safety of SSA staff and the public it serves is an important consideration as we all continue to navigate the COVID-19 pandemic. With the reopening of the offices, however, SSA must again contend with the challenges of providing these in-person services as well continuing to provide services to the public by telephone and online.

One obvious issue is ensuring that there is sufficient staff to take up the workload and help connect customers with the benefits for which they are eligible. Field office staff is responsible for working with customers to complete applications for benefits, answering questions about eligibility, processing applications, verifying eligibility documents, and more. As mentioned earlier, Congress has the authority to provide more funding to the agency to allow them to hire the staff necessary to complete these tasks efficiently and without unnecessary delay.

SSA's field office responsibilities include having staff available for walk-in appointments, which are critical for people who can't easily schedule appointments in advance. Unfortunately, some SSA field offices are still limiting in-person services to people with "dire need" appointments, and are not allowing walk-in services. The only way people are made aware of the status of a particular field office for walk-in visits is through SSA's emergency page at the SSA website, or a hotline number. However this information is inaccessible for most people, who have no idea where to look for it or that it is even available or necessary. The frustration at being turned away from in-person services despite the supposed reopening of SSA's offices will undoubtedly lead some people to give up on or postpone their claims again.

We have also heard from advocates that many people are still unaware that they can come to an SSA office in person. This is particularly true with regard to low-income and older adult claimants who do not have easy access to internet services. SSA must increase its outreach efforts, going beyond emails to advocates and blog posts to let the public know that its offices are open for walk-in services, by using means such as television and radio PSAs, articles in local newspapers, community word of mouth, and other modes of communication.

### SSA Is Challenged by Its Outdated Telephone Services

In addition to the critical importance of in-person services, SSA must address its telephone services and the problems the agency is facing with that service. For people who have difficulty getting to a local office, for reasons of disability, time, money, or other barriers, a telephone call with SSA staff can serve as the link necessary to help them obtain or maintain Social Security or SSI benefits. Trained staff, and readily available interpretation services are essential to providing the assistance claimants seek from SSA.

Unfortunately, the current technology that SSA uses to administer its phone services is severely outdated, and notably, over the past few months, advocates have reported significant problems with busy signals, dropped calls, long wait times, and insufficient staff available to provide assistance, with the result that people are having difficulty accessing benefits and support. One advocate in California told us that from mid-March to early April, 62% of their legal service organization's calls to SSA offices in the Bay Area could not get through, primarily due to the lines being busy. These kinds of failures are not only frustrating to advocates and their clients, but can also lead to additional problems, such as improper overpayments, as people are unable to reach the agency to report changes. This can cause a corresponding increase in SSA's workload as they attempt to deal with the results of these errors.

Part of the issue is the legacy telephone system that SSA has had to contend with for far too long. The agency also recently decided to remove certain local field office phone numbers from its website, which advocates have complained makes it even more challenging to communicate with relevant staff. The staff at the local field offices are often more knowledgeable and able to address relevant issues and concerns more quickly and comprehensively than those at the 800 number. We would encourage SSA to repost these local field office numbers to help advocates and claimants connect with the proper field office staff.

### Improving Online Access and Simplifying Forms and Application Processes Would Also Improve Access to SSA Benefits and Services

We believe there are steps the agency can and should take to make it easier and more efficient overall for individuals to communicate with SSA and access benefits for which they are eligible. In addition, these actions could potentially reduce the burden on SSA's telephone systems and reduce visitors to overcrowded field offices. These actions include: simplifying the benefit application process, making information and forms available online for those who are able to access the internet, and making it easier for the public to conduct business in multiple ways (such as online) so that the load on the telephones is not as severe.

Currently the benefit application process for programs like SSDI and SSI is overly complicated and can serve as a barrier to individuals who either cannot understand the complex questions being asked of them, or have trouble providing the comprehensive and substantial amount of documentation required to complete the application. For older adults with limited English

proficiency, it is even more difficult when these documents and concepts have to be translated into a language other than English. Because of these challenges it often takes individuals and advocates an inordinate amount of time to complete their applications, leading to delays receiving benefits even if they are approved. The current SSI application, for example, is 24 pages long. This is far too burdensome and complicated for older adults and people with disabilities who are trying to apply for benefits. While we know that the agency has already begun looking at simplifying its benefit application forms, we would urge the agency to prioritize this work, which would not only assist claimants, but could also reduce their own workload.

We would like to commend SSA for recent steps it took to implement an SSI Protective Filing Tool on its website that allows people to establish a protective filing date online as long as their SSI application is submitted within 60 days. This is an important step towards making it easier for individuals to apply for benefits, and helping claimants access the benefits for which they are eligible as early as possible. However, we urge the agency to continue working on ways to make applying for SSI benefits easier.

Another way the agency could make it easier for individuals to access information and benefits is to put more information and forms online. In addition to the digital divide I mentioned earlier, there are also significant challenges for those who are fortunate enough to have access to internet services, or the help of an advocate who can go online to assist them. Currently, for example, a low-income older adult cannot file an SSI application online, creating an unnecessary roadblock for people who must go to a local office or have the form mailed to them. We would urge the agency to provide more information and materials online to allow for meaningful engagement and communication with those who have internet access, which can often include people with disabilities that make it more difficult for them to get to field offices. We would also recommend that SSA translate more online forms into other languages to make them more accessible to people with limited English proficiency.

The agency can also take advantage of its ability to make changes at the sub-regulatory level by reviewing and revising its processes to ensure that they work effectively for people who face significant obstacles, including individuals with limited access to technology, individuals who are homeless, and individuals with limited English proficiency. Immigrant eligibility rules are also very complex, and ensuring that SSA's processes are straightforward would reduce confusion and errors.

### SSA Must Increase Its Outreach to Underserved Communities

We recognize that SSA's need for adequate administrative funding is longstanding, and the lack of funding that is presently an issue will make many of these solutions that much more challenging to implement. However, the agency's goal must be to ensure that the people who are eligible for benefits are aware of these benefits and are able to access them. One way to do this is by engaging in community outreach and making a concerted effort to provide assistance to those who need it.

One effort the agency has taken on which we would also like to commend, is its outreach to very low-income Social Security beneficiaries. Often, older adults receiving Social Security are not aware that they might be eligible for benefits like SSI to supplement their income. SSA has reached out to hundreds of thousands of Social Security retirement and disability beneficiaries to inform them of their potential eligibility for SSI. This has led to tens of thousands of people obtaining SSI, and millions of dollars helping older adults and people with disabilities better meet their needs. We thank the agency for these efforts, and hope they will continue.

Another way SSA could prioritize helping individuals access benefits for which they are eligible would be through the creation of a Beneficiary Advocate position within the agency. A Beneficiary Advocate could help the agency identify access issues, promote efforts to engage with underserved communities, and push for solutions to ongoing problems affecting beneficiaries. Finally, SSA should collect racial and ethnic data, as discussed, in part, in its Equity Action Plan,<sup>xiv</sup> to identify and determine whether it is effectively getting benefits to underserved communities that may need additional outreach and support.

In addition, Justice in Aging has endorsed legislation like the Social Security 2100: A Sacred Trust Act (H.R. 5723), for example, which would improve customer service at SSA by ensuring that field offices remain open, requiring SSA to mail annual statements to beneficiaries to inform them of their projected benefits, and improving access to legal representation for people applying for benefits. Justice in Aging also supports a number of other improvements to programs like SSI that would, if enacted, make it easier for SSA to administer.<sup>xv</sup>

Finally, I want to reiterate that sufficient funding is necessary to fix these longstanding problems and must also be part of the solutions to SSA's customer service issues.

### Conclusion

We must both support SSA's customer service efforts through increased funding, while also pushing the agency to do the most it can with the resources it currently has available. The agency should prioritize helping people access and keep benefits for which they are eligible. SSA can make better use of its current resources by striving to get more people connected with the benefits they are entitled to so that they can better meet their needs. Millions of older adults and people with disabilities depend on SSA to keep them from falling into economic insecurity. We hope Congress will provide the agency with the necessary funding and support it needs to effectively accomplish these goals.

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<sup>i</sup> The Supplemental Poverty Measure, 2020, available at

<https://www.census.gov/content/dam/Census/library/publications/2021/demo/p60-275.pdf>

<sup>ii</sup> SSA, Annual Statistical Supplement, 2021, Supplemental Security Income, Table 7E,

<https://www.ssa.gov/policy/docs/statcomps/supplement/2021/index.html>

<sup>iii</sup> Matt Messel and Brad Trenkamp, Characteristics of Noninstitutionalized DI, SSI, and OASI Program Participants, 2016 Update (released April 2022), available at <https://www.ssa.gov/policy/docs/rsnotes/rsn2022-01.html>

<sup>iv</sup> Amber Christ and Tracey Gronniger, Justice in Aging, "Older Women and Poverty," December 2018, available at <https://justiceinaging.org/wp-content/uploads/2020/08/Older-Women-and-Poverty.pdf>

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- <sup>v</sup> Cubanski, J., Koma, W., Damico, A., & Neuman, T., Kaiser Family Foundation, How Many Seniors Live in Poverty (Nov. 2018), available at [files.kff.org/attachment/Issue-Brief-How-Many-Seniors-Live-in-Poverty](https://files.kff.org/attachment/Issue-Brief-How-Many-Seniors-Live-in-Poverty).
- <sup>vi</sup> Denny Chan and Vanessa Barrington, “How Can Legal Services Better Meet the Needs of Low-income LGBT Seniors,” June 2016, available at <https://justiceinaging.org/wp-content/uploads/2016/06/How-Can-Legal-Services-Better-Meet-the-Needs-of-Low-Income-LGBT-Seniors.pdf>.
- <sup>vii</sup> Zhe Li and Joseph Dalaker, Congressional Research Service, Poverty Among the Population Aged 65 and Older, April 14, 2021, available at <https://sgp.fas.org/crs/misc/R45791.pdf>
- <sup>viii</sup> *Id.*
- <sup>ix</sup> Jeffrey Hemmeter, John Phillips, Elana Safran, and Nicholas Wilson, Office of Evaluation Sciences, GSA, “Communicating Program Eligibility: A Supplemental Security Income (SSI) Field Experiment,” November 23, 2020
- <sup>x</sup> Jonathan Stein and David Weaver, The Hill, “Half a million poor and disabled Americans left behind by Social Security,” November 15, 2021, available at <https://thehill.com/opinion/finance/581522-half-a-million-poor-and-disabled-americans-left-behind-by-social-security/>
- <sup>xi</sup> Older Adults Technology Services, “Aging Connected – Exposing the Hidden Connectivity Crisis for Older Adults, March 11, 2022, available at <https://oats.org/aging-connected-exposing-the-hidden-connectivity-crisis-for-older-adults/>
- <sup>xii</sup> *Id.*
- <sup>xiii</sup> Stein and Weaver, *supra* note x.
- <sup>xiv</sup> Social Security Administration, Equity Action Plan in Agreement with EO 13985, February 10, 2022, available at <https://www.ssa.gov/open/materials/SSA-EO-13985-Equity-Action-Plan.pdf>
- <sup>xv</sup> Justice in Aging, Issue Brief, Supplemental Security Income Restoration Act of 2021, available at <https://justiceinaging.org/wp-content/uploads/2021/06/SSI-Policy-Issue-Brief-Updated-2021.pdf>