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Hearing on

Social Security During COVID: How the Pandemic Hampered Access to Benefits and Strategies for Improving Service Delivery

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Chairman Wyden, Ranking Member Crapo and Members of the Committee, my name is Peggy Murphy. In addition to being the Immediate Past President of the National Council of Social Security Management Associations (NCSSMA), I am the District Manager of the Great Falls, Montana Social Security office. On behalf of the National Council, thank you for the opportunity to be here today to provide our front-line perspective of the Social Security Administration's service delivery during the Coronavirus (COVID-19) pandemic.

NCSSMA is a professional association of almost 3000 management personnel in the field offices and teleservice centers of the Social Security Administration (SSA). Each day, NCSSMA members directly serve the American public in over 1,250 of SSA's public-facing offices. For over 50 years, NCSSMA's mission has been to provide a clear, credible and valuable perspective on public service from the front lines.

As our country continues to address the ongoing pandemic, we find ourselves in uncharted territory facing ever-evolving challenges. The pandemic and its ongoing threat to the health, economic security and well-being of our nation have had an unimaginable impact on not only those seeking assistance from our agency, but also our own staff and their loved ones. What remains unchanged during these unprecedented times is that SSA has a critical mission of helping the American public. The role of the Social Security Administration has never been more important than it is today.

NCSSMA firmly believes that this is a time when we must not lose sight of the core mission of the Social Security Administration and, perhaps even more importantly, the many challenges that the agency faces in fulfilling that mission.

On Friday, March 17, 2020, the majority of Social Security employees were informed that effective Monday, March 20, 2020, they would be teleworking indefinitely and that field offices would be closed to the public because of the COVID-19 pandemic. The rest were informed on March 20, 2020, and sent home. This was a colossal undertaking for the agency given that the majority of employees had never teleworked, and the agency's telework pilot had ended just a handful of months before. Within days, the majority of field office employees and a large number of teleservice center employees were successfully teleworking. Initial challenges involved lack of equipment and software licensing as well as data capacity. SSA was able to increase data

capacity and stabilize the network after a few weeks. Unfortunately, securing the software licensing and headset equipment for softphones to enable field office employees to answer incoming public calls and make outgoing calls took longer. Limited quantities of each were available from the previous telework pilot, but significant effort was required to quickly acquire and deploy new equipment and software.

Though field offices were closed to the public, given the nature of the work SSA does, it was not entirely possible for every field office employee to telework. Since the beginning, dedicated members of field office management staff continued to physically come into the office to handle incoming and outgoing mail, scan tens of thousands of documents to support those working from home, provide in-person service for critical cases such as immediate payments, and to handle facility-related duties. Early on, this situation was manageable because so many of our customers found themselves in lock down and dealing with the impact of COVID-19. In addition, many probably believed that at some point in the near future, field offices would reopen, and therefore delayed contacting field offices or calling the teleservice center.

Around four months into the pandemic, those customers who delayed contacting us because they thought our lobbies would reopen, realized they would not, so they began contacting us in increasing numbers. The phone queue was our new lobby. While the majority of our services can be accomplished online or via telephone, one of the ongoing challenges facing customers has been the need for SSA to see original documentation in many situations. Customers began mailing more original documentation, placing an increasing amount of strain on management's ability to stay current on incoming and outgoing mail. Management also needed to address significantly delayed mail service which in many cases resulted in customers searching for their documents. It was an unsustainable situation that continued to deteriorate as demand increased. At around the same time, the agency was making plans to reinstate workloads that had been suspended at the start of the pandemic and increase the types of services that could be performed in the office. Yet, there were no plans to increase onsite staffing.

It was not until early fall of 2020 that a very small number of non-management employees began returning to field offices on a voluntary and rotational basis to assist with the substantial volume of incoming and outgoing mail. Staffing numbers did not increase to higher levels in most locations until late January and early February 2021.

Though comments have been made that employees are more productive working from home, this is far from accurate. No doubt, many employees were more productive early on based on the way the agency measures productivity, meaning that they were able to process more work. However, they are only able to process more work, because of the clerical assistance they receive from onsite personnel and the easing of some programmatic requirements. Prior to the pandemic, individual employees would have been responsible for printing, mailing and faxing their own documents. With the time saved from these responsibilities and the easing of some programmatic requirements, some employees are able to be more productive, but it is not efficient, and it comes at the expense of management not being able to manage the operations in their respective offices.

SSA rarely takes a holistic approach in assessing how long it actually takes to process work from beginning to end. SSA monitors numerous workloads, including, but not limited to: Claims, Redeterminations (RZs) and Continuing Disability Reviews (CDRs). What is not necessarily captured effectively is the amount of other work that SSA staff complete. The agency's current work unit calculations do not take into account the additional work associated with processing a specific action. This has been exacerbated by the pandemic where many workloads now require additional handling and processing time in order to make the work or action portable for

employees to process from home. The additional handling and time necessary to receive, scan, profile, assign and mail documents associated with claims or post-entitlement actions is not reflected in the overall processing time.

In addition to increasing onsite personnel, SSA has made efforts to improve public access to facilities and lessen the clerical burden on field offices. These efforts have included field office drop boxes and the use of Microsoft Teams to conduct certain enumeration interviews. The drop box pilot began in late October 2020 and as of last month was expanded to every field office. If field offices have available space and a separate vestibule, they can install a drop box so that customers can drop off required proofs. This greatly reduces the chances their documents will be lost in the mail. SSA is testing using Microsoft Teams to conduct enumeration interviews with customers where customers can use their smartphone or computer to conduct business face-to-face. It is hoped that this can be expanded to other workloads.

Perhaps the biggest challenge field offices faced and will continue to face in providing service during the pandemic is policies that mandate face-to-face interactions to process certain workloads and the need for in-person service for some of our customers. During the pandemic SSA has relaxed face-to-face requirements for certain workloads and we recommend that these changes be made permanent. For the workloads where face-to-face interactions are required, SSA must find a way to satisfy policy requirements or indeed change such policies when feasible. A good example is enumeration for non-citizens, which requires the undue burden of a face-to-face interview. The incidence of fraud would be low considering that we must verify information with the Department of Homeland Security. If it is indeed a significant concern, then all non-citizens should be enumerated at entry by the US Department of State or the Department of Homeland Security. While eliminating the requirements for face-to-face service can be achieved through changes in policy, procedures or legislation, changing the need for in-person service for some of our customers will be difficult to achieve. During the pandemic, those individuals who do not have Internet service, a telephone or easy access to mail service have not been able to access our services. Even during normal times, these individuals find it difficult to conduct business with SSA, but at least they could visit a field office. This is not a viable option so long as our lobbies remain closed to walk-in service.

While NCSSMA fully supports automation, and the pandemic has reinforced the need for technology upgrades, there is a compelling need for ongoing support of SSA's community-based field offices to adequately serve our most vulnerable customers and those without technology that would otherwise connect them with SSA. Field offices provide compassionate service to the most vulnerable members in our communities including those living in rural and tribal locations. Employees in local offices live and work in the community and, to SSA field office visitors, they provide an invaluable lifeline to essential services. Local field offices make a difference in their communities, beyond the execution of SSA's mission. Although the agency has engaged in an historically unprecedented amount of outreach to vulnerable populations by partnering with advocacy and support groups during the pandemic, the fact is that many community organizations and third-party sites that SSA relies on to connect our underserved populations with us have also been closed. This includes Indian Health Services, homeless shelters and other community advocate centers. Field offices that relied heavily on video service connections with third-party sites have been dormant during the pandemic. Coupling limited staffing in field offices with the closure of most third-party sites, connecting customers in our rural and tribal locations has been difficult.

The Social Security Administration upholds a high standard of superior customer service and maintains this through the employees who work in field offices. The Coronavirus pandemic has

emphasized how critical it is for SSA to continue to transition as an agency and embrace automation, technology and self-help tools such as Internet claims, online enumeration and telework for employees. SSA must provide additional ways for the public to access our services. Even with the shift to more online services, field offices and their employees are necessary to process much of the backend work on complex online cases including Supplemental Security Income (SSI), and to serve our customers who do not have access to the telephone or Internet.

SSA's computer systems face fundamental challenges. Some of SSA's core programs still rely on COBOL systems that are well over 40 years old. Although some databases have been converted to a more modern and flexible platform, SSA must continue to modernize its computer language and database infrastructure, including moving its data to the cloud. It is critical that we focus on these efforts to reduce the risk of cyberattacks, service disruptions and reduced system performance and production.

It is also critical that we continue to advance SSA's IT Modernization Plan while maintaining an appropriate balance between the service delivery options available to the public. NCSSMA members nationwide are interested and willing to play an active role in development, testing and deployment of enhancements to existing systems in addition to new technology and programs. Our position on the front lines provides us with the best vantage point to offer assistance. We continue to encourage agency leadership to include managers and employees on the front lines in all aspects of software development and policy implementation. The challenges of the pandemic have only emphasized the need to include front-line experience and perspective to these efforts.

NCSSMA strongly supports SSA IT modernization. Dedicated funding is needed for IT investments to modernize systems to the standards the Administration, Congress and the public expect. From our perspective, SSA needs to address four specific areas: Modernize Core Agency Applications, Improve SSA's Telephone System and Associated Management Information, Implement National Scanning and Remote Printing, and Implement Technologies that will assist our more vulnerable populations, including the deaf and hard of hearing community, non-English speaking customers, the homeless and those who live in rural and tribal locations.

- **Modernize Core Agency Applications**
    - Improve SSA's Appointment and Check-in System to allow for online appointment scheduling.
    - Modernize both the Supplemental Security Income (TXVI), and the Retirement, Disability and Medicare (TII and TXVIII) claims processing systems utilizing a single claims-taking platform.
    - Modernize the electronic Representative Payee System (eRPS) to both process and oversee the administration of SSA representative payees.
    - Modernize the Electronic Disability Collect System (EDCS) to integrate the disability analysis process in the overall claims process. This includes eliminating all exclusions to the electronic file and the ability to file all appeals online.
    - Work with the Department of Interior to modernize SSA's payroll system, Web Time and Attendance (WebTA).
    - Modernize and consolidate all Management Information (MI) data into a single, user friendly platform that managers can use to control and measure work production.
    - In October 2020, the agency was able to make the SSA-455 CDR mailer available online that Wilkes-Barre mails, but the agency has not yet made the SSA-454 that field offices utilize available for online access. All Medical CDR forms should be available online.

- **SSA's Telephone System**
  - Ensure SSA moves forward expeditiously with a new comprehensive telephone system in order to provide consistency among the National 800 Number, field offices and all other SSA components.
  - Improve Management Information for assessing call volume, levels of customer service and the overall customer experience.

- **National Scanning and Remote Printing**
  - Implement dedicated scanning facilities where members of the public can send by mail, email or facsimile, documents to a central location for scanning, profiling and assigning.
  - Implement a comprehensive remote printing initiative to direct all field office print traffic to one or more centralized locations for mailing.
  - Expand the use of electronic notices behind the *my Social Security* portal.

- **Technology to Meet the Needs of our Vulnerable Populations and Reduce Field Office Contacts**
  - Implement alternative service methods that may include expanded video and video service delivery third-party contracts in rural locations.
  - Make stand alone, self-service kiosks available in locations where the public is already conducting business with other state and local government agencies.
  - Provide enumeration at entry for all immigrants. This would eliminate the need for immigrants to visit SSA field offices.
  - Expand the use of the American Association of Motor Vehicle Administration (AAMVA) verification process to include all 50 states. Allow verification of driver's licenses and state-issued identification via AAMVA for all enumeration activities that would normally require the technician to view the original document. This process is already in use with those states covered under Internet Social Security Replacement Cards online (iSSNRC). This would allow the agency to explore initiatives to provide replacement Social Security cards over video and enhance the current MS Teams enumeration pilot.
  - Expand the use of verification methods through the Department of Homeland Security (DHS) and US Department of State in order to further verify foreign documents and US passports for enumeration purposes. This would allow the agency to issue replacement Social Security cards over video and enhance the current MS Teams enumeration pilot.
  - Expand the use of the Social Security Electronic Remittance System (SERS) to include processing of all remittance types. This will reduce the time it takes to credit a remittance to a customer's account and eliminate the need to involve the Remittance Unit in the Processing Centers.
  - Require members of the public to report wages using current electronic wage-reporting technology. This includes allowing the public to submit wage stubs electronically through *my Social Security*. This would provide a significant reduction in paper processing in field offices and virtually eliminate the need to copy, scan, profile and mail pay stubs.

We understand modernizing SSA's computer systems is costly and will take time. The path established by the Commissioner and his team relative to IT Modernization was making progress in this area, and while the pandemic has resulted in some shifts to address current needs, we must continue to address these challenges.

In addition to IT modernization, NCSSMA believes it is critically important that changes be made to the Social Security and SSI programs that have the potential to increase administrative efficiency, decrease operational costs and ultimately provide better service to our customers. It is unfortunate that a pandemic has reinforced the need for streamlined and updated policies that better serve the public and make it easier for the agency to administer. The pandemic and the service delivery challenges associated with current policies and business practices in place certainly emphasize the need for change. We suggest the following:

- **Eliminate the Need for the Social Security Number Card.** This would reduce Social Security Number fraud, significantly reduce in-office traffic and telephone calls and allow for the closure of Social Security Number Card Centers so that employees could be redeployed to field offices, which would reduce SSA's real estate footprint and save money. In addition, as stated above, expand Enumeration at Entry, DHS interfaces and AAMVA verification in order to enhance and support initiatives to obtain original Social Security Numbers without the need to visit a field office. This would allow field offices to focus on customers with more complex issues that do not lend themselves to online or telephone service.

- **Simplify Disability Work Incentives and Pursue Early Intervention Measures** once a beneficiary is on the rolls. This would reduce the number of disability beneficiaries, minimize time developing complex issues, increase public understanding of work incentives, and return more beneficiaries to work. Early invention measures, such as supportive employment services and targeted incentives for employers to help disabled workers remain on the job, have the potential to achieve long-term gains in employment.

- **Supplemental Security Income (SSI) Program Simplification** in order to improve the efficiency of program administration and yield savings to the American taxpayer. Continuous policy changes regarding resources, income and living arrangements make it difficult to administer the SSI program and ensure accuracy of payments. With growing agency workloads and diminished resources, the following SSI policy simplifications are recommended:

  - **Revise SSI Living Arrangements (LA) and In-kind Support and Maintenance (ISM) Rules** to eliminate administrative complexity and a source of payment errors. Reducing the myriad of living arrangement situations would eliminate complex development and save administrative costs, while still providing a support mechanism for SSI recipients.

  - **Change SSI Retrospective Monthly Accounting (RMA) Rules Regarding Prisoners** allowing a beneficiary recently released from jail to collect SSI benefits until Social Security benefits are reinstated. This is a labor-intensive workload with little benefit. Changes would save administrative costs.

  - **Eliminate the Dedicated Account and Installment Payment Provisions in SSI** to reduce administrative complexity. The first provision requires underpayments paid to SSI disabled children be set aside in a dedicated account for use on only approved expenditures. The second provision requires that underpayments in excess of three times the Federal Benefit Rate be released in no more than three installments. Eliminating these provisions will improve administration and management of money for SSI recipients.

o **Eliminate SSI Holding Out Provisions** for individuals who hold themselves out to be husband and wife to be considered a couple, the same as if legally married. The Holding Out provision, which also applies to same sex couples, is a carry-over from pre-1970 state welfare laws. It adds unnecessary complexity to SSI cases, and leads to unequal treatment of applicants in similar situations. Elimination would save administrative costs.

- **Simplify Workers' Compensation (WC) and Public Disability Benefit (PDB) Offset** through legislation to simplify WC and PDB offset computation by providing a flat benefit reduction would simplify the complex calculations now required to apply the offset and significantly reduce SSA's need to continually monitor the worker's receipt of, and fluctuations in, the number of WC/PDB payments. Replacing the existing complicated offset calculation with a uniform offset, would realize administrative savings without a significant impact on beneficiary payments.

Much of what we have discussed can be accomplished, but it requires resources. **SSA must have consistent and adequate funding** to ensure the American public receives the services for which they have paid for, expect and deserve. Our hope is that the Fiscal Year (FY) 2022 appropriations process will result in no less than the President's budget request of $14.2 billion for SSA. Resource allocations in FY 2022 must be sufficient to improve the timely processing of disability claims, expand outreach to vulnerable populations, and ensure that SSA makes the correct payments to those who qualify while maintaining program integrity work. Resources are also necessary to advance SSA's ongoing IT Modernization project that will significantly enhance the agency's systems and improve productivity, while at the same time increasing the accessibility of benefits for seniors and people with disabilities.

Our customers deserve improved telephone and online services, while still being able to request timely and safe in-person service. Our offices must continue to have the resources and staff necessary to address additional workloads and responsibilities. The President's FY 2022 budget request provides $895 million in additional funding to provide better services at SSA's field offices, teleservice centers, and State disability determination services. Perhaps consideration should be given to multi-year funding for critical systems investments and expenditures. This would ensure that adequate planning could be completed for service delivery improvements.

SSA must also continue to address critical stewardship workloads that save billions of dollars for taxpayers. It is imperative that the workers and taxpayers who have paid trillions of dollars in FICA taxes to the trust funds have access to all the necessary services that they have paid for and receive timely benefit payments. The President's FY 2022 budget request includes $1.9 billion for dedicated program integrity activities, including a $283 million increase above the FY 2021 enacted level. The definition of program integrity funding should be expanded to include critical systems investments and expenditures that facilitate completion of program integrity initiatives.

From the beginning of the pandemic, the Commissioner and agency leadership have placed customer service at the forefront and every effort has been made for SSA to provide a full range of services to the American public. Management and employees have continued to provide the highest quality of compassionate service possible during these difficult times. Though the pandemic has changed this agency and the customers we serve, we should take this opportunity to reassess the customer experience and what it means to provide world class customer service. This is a moment for SSA to redefine itself, its mission and its place in the public sphere and finally move into the 21st Century.

On behalf of the National Council of Social Security Management Associations, thank you again for the opportunity to be here today to provide our front-line perspective of the Social Security Administration's service delivery during the Coronavirus pandemic. National Council members are not only dedicated Social Security employees, but are also personally committed to the mission of the agency, providing the best service possible to your constituents. We want to ensure the American public benefits from the lessons learned during these unprecedented times. We respectfully ask that you consider our comments and appreciate any assistance you can provide in ensuring the American public receives the critical and necessary service they deserve from the Social Security Administration.