

>>> GOOD MORNING, EVERYONE.
I'D LIKE TO WELCOME ALL OF YOU
HERE, BOTH PHYSICALLY AND
VIRTUALLY TO THE FIRST PUBLIC
FORUM THE SOCIAL SECURITY
ADMINISTRATION IS HOSTING AS
PART OF OUR AGENCY-WIDE SECTION
504 SELF EVALUATION.
MY NAME THE RON RABORG, I'M THE
DEPUTY COMMISSIONER FOR QUALITY
PERFORMANCE AND THE AGENCY LEAD
TO THE 504 SELF EVALUATION.
FIRST, I'D LIKE TO THANK ALL MY
STAFF AND ALL OF OUR COLLEAGUES
ACROSS THE AGENCY, AND I
ESPECIALLY WANT TO THANK THE
VOLUNTEERS AND PANEL MEMBERS
THAT HAVE BEEN INSTRUMENTAL IN
PULLING THIS FORUM TOGETHER.
I CAN'T THANK YOU ENOUGH.
THIS IS A BEAUTIFUL JOB,
BEAUTIFUL VENUE.
SSA IS COMMITTED TO ENSURING
THAT EVERYONE HAS MEANINGFUL
ACCESS TO PROGRAMS, ACTIVITIES,
AND FACILITIES IN ACCORDANCE
WITH 504, SECTION 504 OF THE
REHABILITATION ACT OF 1973.
AND SECTION 504'S RELEVANT
IMPLEMENTING REGULATIONS.
SSA IS ALSO COMMITTED TO
ENSURING THAT WE EFFECTIVELY
COMMUNICATE WITH THE PUBLIC.
WE'RE PLEASED TO BE HOSTING THE
FIRST OF TWO PUBLIC FORUMS
TODAY.
THIS FORUM WILL FOCUS ON OUR
POLICIES AND FACILITIES AND THE
NEXT FORUM ON SEPTEMBER THE 20th
WILL CONCENTRATE ON TECHNOLOGY
AND COMMUNICATIONS.
WE WANT TO HEAR DIRECTLY FROM
YOU, THE PUBLIC, ABOUT HOW WELL
WE ARE DOING IN PROVIDING YOU
AND PEOPLE WITH DISABILITIES
MEANINGFUL ACCESS TO OUR
PROGRAMS, ACTIVITIES, AND
FACILITIES.
I'D LIKE TO INTRODUCE ROBIN
SABATINO AND THANK HER FOR HER
COORDINATIVE EFFORTS ON BRINGING
THIS ALL TOGETHER.

SHE'S OUR PROGRAM MANAGER FOR
SSA'S SELF EVALUATION.
ROBIN?

>> THANK YOU.

AND I WANT TO SECOND RON'S
WELCOME TO EVERYONE AND THANK
YOU FOR YOUR PARTICIPATION IN
THIS FORUM.

AS RON MENTIONED, TODAY'S TOPICS
ARE FACILITIES AND POLICY.

AND WE'RE VERY COMMITTED TO
ENSURING OUR FACILITIES ARE
ACCESSIBLE TO MEMBERS OF THE
PUBLIC WHO HAVE DISABILITIES.
WE WORK HARD TO ENSURE PEOPLE
WITH DISABILITIES CAN ACCESS OUR
BUILDINGS AND NAVIGATE WITHIN
THEM, AND WE'RE CONTINUOUSLY
WORKING TO IMPROVE ACCESSIBILITY
IN ALL OF OUR FACILITIES.

THE SECOND STOP PICK IS POLICY
AND -- TOPIC IS POLICY AND
THAT'S A VERY COMPLEX AREA.
FOR LARGE AGENCIES SUCH AS
SOCIAL SECURITY, WE HAVE PAGES
AND PAGES OF POLICY, AND THERE'S
A LOT OF POLICY THAT WE HAVE TO
REVIEW AND CONTINUE TO KEEP
CURRENT.

WE'RE AWARE THAT REVISING POLICY
SHOULD INCLUDE CONSIDERATION OF
ANY EFFECTS THE REVISION MAY
HAVE ON POLICIES AND CUSTOMERS,
INCLUDING PERSONS WITH
DISABILITIES.

I WANT TO TURN IT BACK OVER TO
RON.

>> OUR ROLE IN THESE FORUMS IS
TO LISTEN TO YOU, THE MEMBERS OF
THE PUBLIC, SO THAT WE COMPLETE
THE BEST AND MOST EFFICIENT SELF
EVALUATION PLAN POSSIBLE.

AS WE ALL KNOW, AND WE'VE SEEN
RECENTLY, THE FEDERAL GOVERNMENT
HAS LIMITED RESOURCES AND WE
INTEND TO MAKE THE MOST
EFFECTIVE USE OF RESOURCES
AVAILABLE TO US FOR THE
SELF-EVALUATION.

WE ENCOURAGE YOUR COMMENTS TO
HELP DETERMINE HOW TO DO THAT.
BOTH -- DURING BOTH FORUMS, WE

WILL WELCOME COMMENTS FROM
INDIVIDUALS AND ADVOCATES.
ONCE ALL COMMENTS, BOTH WRITTEN
AND ORAL, ARE RECEIVED, WE WILL
CAREFULLY REVIEW THE COMMENTS
AND PROPOSE FURTHER REVIEWS IN
THESE AREAS.

SO WHAT HAPPENS NEXT?

AT THE END OF OUR 504
SELF-EVALUATION ACTIVITIES, WE
WILL PREPARE A TRANSITION PLAN
THAT LISTS THE AREAS WE EXAMINE,
BARRIERS WE IDENTIFIED, AND OUR
RECOMMENDED MODIFICATIONS.
NOW I WILL TURN IT OVER TO OUR
MODERATOR.

PLEASE ALLOW ME TO INTRODUCE
WILLIAM JARRETT FROM OUR OFFICE
OF COMMUNICATIONS.

WILL?

>> THANKS, RON.

GOOD MORNING, EVERYONE.

I'M WILLIAM JARRETT WITH THE
SOCIAL SECURITY ADMINISTRATION'S
OFFICE OF COMMUNICATIONS AND
WELCOME TO OUR SECTION 504
SELF-EVALUATION PUBLIC FORUM ON
FACILITIES AND POLICIES.

AS RON SAID, I WILL BE TODAY'S
MODERATOR.

BEFORE WE GET STARTED I WANT TO
MAKE A COUPLE OF ANNOUNCEMENTS
AND TAKE CARE OF HOUSEKEEPING
ITEMS.

FIRST, TURN OFF ALL CELL STONES
OR SET THEM TO VIBRATING MODE SO
AS NOT TO DISTURB THE PUBLIC
FORUM TODAY.

IN THE EVENT OF AN EMERGENCY, WE
WILL BE NOTIFIED OF THAT
EMERGENCY AND WE WILL BE EXITING
FROM MY RIGHT, FOR YOU FOLKS
THAT ARE HERE IN PERSON, THAT'S
YOUR LEFT, DIRECTLY OUTSIDE.

NOW, MANY PERSONS LET US KNOW IN
ADVANCE THEY HAD A DISABILITY
THAT REQUIRED A REASONABLE
ACCOMMODATION.

IF AT ANY TIME YOU REALIZE YOU
NEED A REASONABLE ACCOMMODATION
OR A CHANGE OF REASONABLE
ACCOMMODATION OR YOU FIND THAT

THE REASONABLE ACCOMMODATION THAT WE PROVIDED IS NOT WORKING FOR YOU, PLEASE LET US KNOW IMMEDIATELY SO WE CAN HELP YOU. WE WANT TO MAKE SURE TODAY'S PUBLIC FORUM IS HELPFUL TO YOU AND THAT'S ONE OF THE WAYS WE CAN DO THAT.

SSA STAFF ARE HERE TO HELP YOU AT THE OPEN FORUM.

EVERYONE HAS BADGES ON.

PLEASE DO NOT HESITATE TO ASK THEM IF YOU NEED ASSISTANCE.

AS EXPLAINED IN THE FEDERAL REGISTER NOTICE, THE EVENT IS BEING RECORDED AND WEBCAST AND WILL BE A MATTER OF PUBLIC RECORD.

EVERYONE HERE TODAY IS REMINDED AGAIN THAT YOUR PARTICIPATION HERE MEANS THAT YOUR CONSENT TO YOUR PARTICIPATION IS BEING MADE PUBLIC.

THAT IS, THE VIDEO AND TRANSCRIPT OF TODAY'S COMMENTS WILL BE PROVIDED TO THE PUBLIC, INCLUDING ON THE INTERNET. WITH THAT IN MIND, WHEN YOU COMMENT TODAY, PLEASE DO NOT PROVIDE US WITH UNNECESSARY PERSONALLY IDENTIFYING INFORMATION, MEDICAL INFORMATION, OR CONTACT INFORMATION THAT YOU DO NOT WISH TO BE MADE PUBLIC.

NOW, WE KNOW BREAKS ARE IMPORTANT.

GIVEN TODAY'S TODAY, WE'RE ANTICIPATING TAKING A BRIEF BREAK WHEN IT WARRANTS, SO WHEN WE HAVE A BREAK AND SOME OF THE FOLKS WHO ARE COMMENTING VIA TELEPHONE OR IN PERSON, WE'LL BE ABLE TO TRY AND GIVE YOU A BREAK.

WE ALSO INTEND TO BREAK FOR LUNCH, BUT IF OUR LIST OF SPEAKERS RUNS SHORTER THAN WHAT WE ANTICIPATED, WE MAY JUST, YOU KNOW, PUSH THROUGH AND GO ALL THE WAY THROUGH LUNCH AND END THEN.

WE WILL KEEP YOU POSTED AFTER EACH BREAK AND POSSIBLY BETWEEN COMMENTERS IF WE'RE ANTICIPATING A BREAK AGAIN.

ALSO MENTIONED IN THE PUBLIC REGISTER, AND THIS IS VERY, VERY IMPORTANT, YOU MAY DECIDE TO SUBMIT YOUR WRITTEN COMMENTS FOR 90 DAYS AFTER THIS FORUM.

THAT IS BY NOVEMBER 15th, 2011.

WE ENCOURAGE YOU TO SUBMIT COMMENTS ONLINE AT WWW.REGULATIONS.GOV.

AGAIN, THAT'S

WWW.REGULATIONS.GOV.

SEARCH FOR DOCKET

ID-SSA-2011-0035.

AGAIN, THAT'S DOCKET

ID SSA-2011-0035.

YOU MAY ALSO SUBMIT YOUR WRITTEN COMMENTS HERE TODAY AT OUR DOCKET COUNTER.

THE AUGUST 2nd, 2011, FEDERAL REGISTER NOTICE PROVIDES DETAILED INSTRUCTIONS AND GUIDANCE ABOUT THE AVAILABILITY OF REASONABLE ACCOMMODATIONS IN SUBMITTING COMMENTS.

BY WAY OF REMINDER, THIS PUBLIC FORUM IS AN OPPORTUNITY FOR US TO TAKE IN YOUR COMMENTS AND SUGGESTIONS, AS RON SAID.

BECAUSE OF TIME AND PRIVACY CONSTRAINTS, WE CANNOT ANSWER INDIVIDUAL BENEFIT QUESTIONS AT THIS PUBLIC FORUM TODAY.

WE WILL NOT BE RESPONDING TO SPECIFIC QUESTIONS REGARDING AGENCY POLICY OR PROCEDURE.

HOWEVER, AS YOU KNOW, THE PURPOSE OF OURSELF-EVALUATION -- OF OUR SELF-EVALUATION IS TO EXAMINE OUR POLICY AND PROCEDURES REGARDING OUR PROGRAMS, ACTIVITIES, AND FACILITIES.

ACCORDINGLY, THE OBJECTIVE FOR OUR LIMITED TIME TOGETHER TODAY IS TO GATHER YOUR INPUT AND IDEAS SO WE CAN CONSIDER HOW TO INCORPORATE THEM AS WE GO FORWARD WITH

OUR SELF-EVALUATION.

TODAY'S TOPICS ARE FACILITIES
AND POLICY.

FACILITIES INCLUDE, FOR EXAMPLE,
SSA PARKING LOTS, ENTRANCES, AND
BUILDINGS.

POLICY INCLUDES A WIDE VARIETY
OF SUBJECTS.

THE PANEL MEMBERS HERE WITH US
TODAY ARE NOT -- ARE MOST
FAMILIAR, EXCUSE ME, WITH
FACILITIES AND POLICY.

SO PLEASE TAKE ADVANTAGE OF THIS
OPPORTUNITY TO PRESENT YOUR
COMMENTS ON THESE TOPICS TO THEM
TODAY.

THE PANEL MEMBERS ARE SITTING
HERE WITH ME TODAY, AND THEY
ARE, TO MY FAR RIGHT AND YOUR
LEFT, DAN KNIGHT FROM THE OFFICE
OF RETIREMENT AND DISABILITY
POLICY.

TO MY IMMEDIATE RIGHT, FRAN
HUBER, ALSO FROM THE OFFICE OF
RETIREMENT AND DISABILITY
POLICY.

TO MY IMMEDIATE LEFT, ALICIA
LUSTER, OFFICE OF FACILITIES AND
SUPPLY MANAGEMENT, AND TO MY FAR
LEFT, GREG WILLIAMS, FROM THE
OFFICE OF PUBLIC SERVICE AND
OPERATIONS SUPPORT.

PLEASE KEEP IN MIND THAT THERE
IS ANOTHER PUBLIC FORUM COMING
UP ON SEPTEMBER 20th, 2011.

AT THE SEPTEMBER 20th PUBLIC
FORUM, THE TOPICS WILL BE
COMMUNICATIONS AND TECHNOLOGY.

AT THAT PUBLIC FORUM, THERE WILL
BE DIFFERENT PANEL MEMBERS WHO
ARE VERY FAMILIAR WITH THOSE
TOPICS, BUT WE DO INVITE YOU TO
REGISTER AND JOIN US AGAIN TO
COMMENT ON COMMUNICATIONS AND
TECHNOLOGY ON SEPTEMBER 20th.

NEXT, LET'S DISCUSS THE
PROCEDURES FOR COMMENTING TODAY.
HOW DO YOU ACTUALLY PROVIDE A
COMMENT?

EVERY COMMENTER HAS FIVE MINUTES
AND WE WOULD ASK YOU TO KEEP TO
THAT FIVE MINUTES AS WELL.

AS YOUR TIME IS COMING TO A CLOSE -- OR EXCUSE ME, AS YOU BEGIN, IF YOU'RE HERE IN THE ROOM WITH US, YOU WILL SEE A GREEN LIGHT WHEN YOU COME UP TO THE COMMENT TABLE AND THAT'S YOUR CUE TO BEGIN.

WHEN YOU ARE DOWN TO ONE MINUTE LEFT, YOU WILL SEE THE YELLOW LIGHT FLASH AND YOU WILL HEAR A BEEP AS WELL.

WHEN YOU'RE DOWN TO -- WHEN YOUR TIME HAS ENDED, EXCUSE ME, THE RED LIGHT WILL FLASH AND YOU WILL HEAR THIS SOUND.

[BEEP]

AS TODAY'S MODERATOR, I MAY ALSO STEP IN AND REMIND YOU THAT YOU HAVE X-AMOUNT OF MINUTES LEFT OR X-AMOUNT OF SECONDS LEFT TO COMPLETE AND ALSO REMIND YOU THAT YOUR TIME IS UP.

IF YOU HAVE A DISABILITY THAT REQUIRES A SPECIFIC MANNER OF COMMUNICATION ABOUT YOUR TIME, JUST LET US KNOW.

PLEASE KEEP TO THAT TIME -- THE FIVE-MINUTE TIME FRAME, EXCUSE ME, SO THAT EVERY PERSON WHO JOINS US TODAY, EITHER IN PERSON OR ON THE PHONE, HAS SUFFICIENT TIME TO COMMENT.

AGAIN, I WANT TO THANK YOU ALL FOR JOINING US TODAY.

IT'S GREAT TO SEE THE FOLKS HERE IN THE AUDIENCE AS WELL AS GREAT TO HAVE THE FOLKS WHO ARE COMMENTING VIA TELECONFERENCE, AND WE DO APPRECIATE YOUR COMMENTS HERE AT SSA.

WE ENCOURAGE YOU TO SHARE WITH US SO WE CAN LEARN FROM YOU AND WE CAN DO A BETTER JOB TOGETHER SERVING YOU, OUR CUSTOMERS, AND THE PUBLIC.

NOW, IF WE'RE RED DIRK LET'S TURN TO -- READY, LET'S TURN TO OUR FIRST COMMENTER AND I THINK WE HAVE A COMMENTER BY TELECONFERENCE TO GET IT STARTED TODAY.

I BELIEVE IT'S A MISS EVELYN

McNAMARA.

MS. McNAMARA, WOULD YOU PLEASE LET US KNOW WHAT ORGANIZATION YOU'RE FROM AND PLEASE REMEMBER THAT YOU HAVE FIVE MINUTES TO COMMENT.

YOU MAY BEGIN.

>> HI.

I WORK WITH PEOPLE WITH DISABILITY.

I SELF-CONTRACT.

I WORK FOR COZY CARE, BE SUB CONTRACT.

I HAVE A CONSUMER FOR SIX MONTHS, WE'VE BEEN TRYING TO FIND SOMEONE TO HELP HER WITH HER SSI.

SHE WORKS PART-TIME, SHE HAS CP, WORKS PART-TIME, AND GOES TO SCHOOL.

BECAUSE OF GOING TO SCHOOL, SHE LIVES -- IT'S MORE CONVENIENT BECAUSE SHE'S IN A WHEELCHAIR, IT'S MORE CONVENIENT FOR HER TO LIVE ON CAMPUS IN THE APARTMENTS, BUT BECAUSE SHE FILLED OUT WRONG FOR FILING FOR FOOD STAMPS, THEY HAD CUT HER SSI.

WE HAVE TRIED TO SIX MONTHS TO GET HER SSI BACK AND LET THEM KNOW THAT SHE PAYS HER FAIR SHARE OF THE APARTMENT.

CAN'T GET AHOLD OF ANYBODY TO REALLY SIT DOWN AND HAVE A MEETING.

WE'VE CALLED, LIKE I SAID, FOR SIX MONTHS TRYING TO GET THIS CLEARED UP AND WE EVEN SENT A LETTER TO THE CONGRESSMAN DANIEL WEBSTER, IN HOPES OF RESOLVING THIS ISSUE WITH HER.

AND WE DIDN'T SEND IN INCOME THINGS FOR HER FOR LIKE TWO OR THREE MONTHS, DID NOT WANT THAT TO AFFECT, BECAUSE THEY SAID THAT AFFECTED HER, DID NOT WANT THAT TO AFFECT HER SSI AGAIN.

WE SENT IT IN AND THEN THEY DISCONTINUE HER FOOD STAMPS, SAID SHE'S NO LONGER ELIGIBLE FOR THAT.

THEY DON'T GIVE A COMMENT WHY.
I THINK IT WOULD BE IMPORTANT IF
WE COULD NOT BE JUST -- IF THE
CONSUMERS WOULD NOT BE JUST A
PIECE OF PAPER THAT PEOPLE LOOK
AT.

IF THEY HAVE SOMEONE THAT THEY
COULD CALL THEM MAYBE AND NOTIFY
THEM, IF THEY ARE CUTTING THEIR
ELIGIBILITY, IF THEY COULD
NOTIFY THEM IN PERSON AND SET UP
A MEETING BEFORE THEIR BENEFITS
ARE DISCONTINUED, I THINK THAT
WOULD BE VERY, VERY HELPFUL IN
SOLVING A LOT OF UNHAPPY PEOPLE
AND BENEFIT ISSUES WITH
CONSUMERS AND SSI.

THAT'S ALL I HAVE TO SAY,
REALLY.

>> ARE YOU STILL ON THE LINE
WITH ME?

>> YES, I AM.

>> OKAY.

THANK YOU AGAIN FOR PROVIDING
YOUR COMMENTS --

>> ACTUALLY, I WANT TO SAY THANK
THEM.

>> OH, WELL, THAT'S FINE.
I'LL MAKE SURE YOU TELL THEM
"THANK YOU."

THANK YOU FOR PROVIDING YOUR
COMMENTS TO -- PROVIDING YOUR
COMMENTS TO US TODAY, AND, YOU
KNOW, WE ENCOURAGE YOU TO GO
BACK TO THE SOCIALSECURITY.GOV
WEBSITE.

>> THANK YOU, MS. McNAMARA FOR
YOUR COMMENTS.

WE REALLY DO APPRECIATE THEM.
I'M GOING TO ASK YOU ALL TO
STAND BY FOR JUST A FEW MINUTES
WHILE WE TELECONFERENCE WITH OUR
NEXT CALLER.

SO PLEASE BE PATIENT WITH US.

PLEASE STAND BY.

THIS EVENT WILL RESUME SHORTLY.

PLEASE STAND BY.
THIS EVENT WILL RESUME SHORTLY.
PLEASE STAND BY.
THIS EVENT WILL RESUME SHORTLY.
>> OKAY.
I THINK WE'RE READY TO RESUME.
WELCOME BACK TO OUR PUBLIC
FORUM, SECTION 504
SELF-EVALUATION PUBLIC FORUM ON
FACILITIES AND POLICY.
WE HAVE OUR NEXT TELECONFERENCE
CALLER ON THE LINE.
IT'S A MISS LINDA LANDRY.
MISS LANDRY, PLEASE IDENTIFY THE
ORGANIZATION THAT YOU REPRESENT
AND REMEMBER THAT YOU HAVE FIVE
MINUTES TO LEAVE YOUR COMMENTS.
YOU ANYWAY BEGIN.
>> THANK YOU VERY MUCH.
MY NAME IS LINDA LANDRY, I AM AT
THE DISABILITY LAW CENTER IN
BOSTON.
WE ARE THE PROTECTION AND
ADVOCACY ORGANIZATION FOR
MASSACHUSETTS.
I WANTED TO SAY BRIEFLY THAT IN
ADDITION TO MAKING SURE THAT
SOCIAL SECURITY OFFICES ARE
PHYSICALLY ACCESSIBLE TO THE
PUBLIC, IT'S VERY IMPORTANT FOR
SOCIAL SECURITY TO EVALUATE
WHETHER INDIVIDUALS WITH
DISABILITIES ARE ABLE TO ACCESS
SOCIAL SECURITY'S PROGRAMS IN A
NONDISCRIMINATORY MANNER.
SOCIAL SECURITY'S BENEFIT
PROGRAMS ARE VERY IMPORTANT TO
PEOPLE WITH DISABILITIES AND TO
ELDERS, BUT THE PROGRAM RULES
AND PROCESSES ARE VERY COMPLEX.
IT'S IMPORTANT TO UNDERSTAND
THAT THE MAJORITY OF PEOPLE
NEEDING ASSISTANCE UNDERSTANDING
THE RULES AND PROCESSES AND
ACCESSING THE PROGRAMS WILL NOT
HAVE THE LEVEL OF FUNCTIONAL
LIMITATION THAT MAY RESULT IN AN
INDIVIDUAL HAVING A GUARDIAN.
SOMETIMES I HAVE THE SENSE IN
SOME OFFICES THAT THIS IS A
COMMON MISUNDERSTANDING.
WITHOUT ASSISTANCE, INDIVIDUALS

MAY NOT BE ABLE TO ACCESS SOCIAL SECURITY PROGRAMS AT ALL OR THEY MAY NOT BE ABLE TO ACCESS THEM EFFECTIVELY.

FOR EXAMPLE, PEOPLE MAY NOT GET ALL THE BENEFIT THAT THEY'RE ENTITLED TO OR THEY MAY END UP GETTING TOO MUCH, WHICH RESULTS IN AN OVERPAYMENT, WHICH IS BAD FOR THE AGENCY AND THE INDIVIDUAL.

THE KINDS OF ASSISTANCE THAT PEOPLE NEED, BRIEFLY, EXAMPLES INCLUDE PEOPLE WITH TRAUMATIC OR ACQUIRED BRAIN INJURY.

THEY MAY HAVE A RANGE OF NEEDS FOR ASSISTANCE.

THE RANGE COULD BE FROM, YOU KNOW, FOLKS WITH SOME EXECUTIVE FUNCTION LIMITATIONS NEEDING A LITTLE EXTRA TIME FOR

EXPLANATIONS, YOU KNOW, ALL THE WAYS TO FOLKS WITH A GREATER LEVEL OF INJURY NEEDING ASSISTANCE COMPLETING FORMS AND OBTAINING NECESSARY DOCUMENTS.

PEOPLE WITH PSYCHIATRIC CONDITIONS MAY HAVE A VERY SIMILAR NEED FOR THIS KIND OF A RANGE OF ASSISTANCE, DEPENDING ON THE CONDITION THAT THEY HAVE AND THE LEVEL OF SEVERITY OF THE CONDITION AT THE TIME OF THE CONTACT WITH SOCIAL SECURITY.

SO IT VARIES SOMETIMES WITH PSYCHIATRIC CONDITIONS.

SOME INDIVIDUALS MAY NOT BE ABLE TO ENDURE THE LONG WAITS FOR SERVICE THAT ARE TYPICAL IN SO MANY SOCIAL SECURITY OFFICES AT THE CURRENT TIME BECAUSE OF PAIN OR BECAUSE OF OTHER PHYSICAL NEEDS OR INABILITIES TO JUST, FOR INSTANCE, SCHEDULE

DISABILITY ACCESSIBLE RIDES.

INDIVIDUALS WHO ARE DAEFR OR HARD OF -- DEAF OR HARD OF HEARING MAY NEED ASL SERVICES OR APPROPRIATE AUXILIARY AIDS IN ORDER TO HAVE EFFECTIVE COMMUNICATION WITH SOCIAL SECURITY, AND IT'S REALLY

IMPORTANT TO RECOGNIZE, ALSO,
THAT MANY PEOPLE WHO ARE DEAF
ARE NOT FLUENT IN ENGLISH, SO
THAT PROVIDING WRITTEN MATERIALS
MAY NOT BE AN EFFECTIVE
COMMUNICATION SUBSTITUTE.

ALTHOUGH IT IS IMPORTANT FOR
SOCIAL SECURITY TO HAVE WRITTEN
MATERIALS THAT ARE ACCESSIBLE TO
PEOPLE.

THESE ARE BUT A FEW EXAMPLES OF
INDIVIDUALS WITH DISABILITIES
WHO MAY NEED AN ACCOMMODATION IN
ORDER TO EFFECTIVELY ACCESS
SOCIAL SECURITY'S PROGRAMS.

IN ORDER TO BE ABLE TO SCREEN
FOR AND PROVIDE THE NECESSARY
LEVEL OF ASSISTANCE, SOCIAL
SECURITY NEEDS WELL-TRAINED AND
POLICY-SUPPORTED STAFF,
INCLUDING OFFICE GUARDS WHO ARE
ABLE TO IDENTIFY INDIVIDUALS
NEEDING ASSISTANCE AND PROVIDE
IT.

ACCOMMODATION POLICIES SHOULD
NOT JUST BE AN ADJUNCT TO -- AN
ADJUNCT TO OTHER POLICIES AND
POLICY SERVICES.

RATHER, THEY SHOULD BE BUILT IN
TO SERVICE POLICIES ALL ALONG
THE WAY AND HAVE THE NECESSARY
I.T. SUPPORT.

THIS IS GOING TO REQUIRE THE
SCREENING OF ALL SOCIAL SECURITY
POLICIES AND SUPPORTS FOR NEEDED
IMPROVEMENTS.

THAT'S ALL I HAVE TO SAY TODAY.

I WANT TO THANK YOU FOR THE
OPPORTUNITY TO PROVIDE THE
COMMENTS.

THANK YOU.

>> THANK YOU, MISS LANDRY.

I APPRECIATE YOU STAYING WITHIN
THE FIVE-MINUTE TIME LIMIT AS
WELL.

OKAY, I'M GOING TO ASK YOU ALL,
THOSE WATCHING LIVE VIA WEBCAST
AND THOSE IN FERN WITH US TODAY
TO -- PERSON WITH US TODAY TO
PLEASE STAND BY FOR A FEW
MINUTES AND BE PATIENT WITH US
AS WE WAIT TO TELECONFERENCE

WITH OUR NEXT COMMENTER.
WE HAVE MR. ACORN ON THE LINE?
>> I'M SORRY, MR. ACORN IS NOT
AVAILABLE TO SPEAK AT THIS TIME.
WE HAVE MISS CARRIE LESHEEN ON
THE LINE INSTEAD.
>> OKAY, I APOLOGIZE.
GOOD MORNING, MISS LESHEEN.
>> GOOD MORNING.
>> THANK YOU FOR JOINING US.
AGAIN, PLEASE IDENTIFY THE
ORGANIZATION THAT YOU REPRESENT,
IF YOU DO.
>> ABSOLUTELY.
MY NAME IS CARRIE LESHEEN AND
I'M A SENIOR STAFF ATTORNEY AT
THE NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE.
SHOULD I BEGIN?
>> GOOD MORNING AGAIN.
YOU MAY BEGIN.
>> OKAY.
ALTHOUGH THE SOCIAL SECURITY
ADMINISTRATION SERVES TENS OF
MILLIONS OF INDIVIDUALS AND
HAVING A DISABILITY IS AN
ELIGIBILITY REQUIREMENT FOR
RECEIPT OF SOME SSA BENEFITS,
THE AGENCY TO DATE HAS NOT TAKEN
THE STEPS NEEDED TO COMPLY WITH
SECTION 504.
WE'RE CERTAINLY PLEASED THAT
YOU'RE DOING A SELF-EVALUATION
NOW, BUT CLIENTS EXPERIENCE
MANY, MANY DIFFICULTIES IN
NAVIGATING THE SOCIAL SECURITY
ADMINISTRATION.
PEOPLE HAVE DISABILITIES THAT
MAKE IT HARD TO COMPLETE AGENCY
FORMS, GATHER DOCUMENTS,
REMEMBER AND ATTEND
APPOINTMENTS, AND COMMUNICATE
EFFECTIVELY WITH THE AGENCY, AND
THE AGENCY FREQUENTLY DOES NOT
PROVIDE THESE INDIVIDUALS WITH
THE REASONABLE ACCOMMODATIONS
REQUIRED BY SECTION 504.
THE SOCIAL SECURITY
ADMINISTRATION ALSO LACKS A
COMPREHENSIVE SECTION 504
POLICY.
IT HAS SOME WRITTEN POLICIES

REQUIRING STAFF TO HELP SOME INDIVIDUALS AND TO MAKE SOME EXCEPTIONS TO SOME PROGRAM RULES, BUT THESE POLICIES AT PRESENT ARE NOT ADEQUATE AND ALL TOO OFTEN, THEY'RE NOT COMPLIED WITH IN PRACTICE.

AND IT TOOK A LAWSUIT AND MANY YEARS OF LITIGATION BEFORE THE AGENCY ADOPTED ADEQUATE POLICIES AND PROCEDURES FOR PROVIDING WRITTEN NOTICES IN ALTERNATIVE FORMATS TO CLAIMANTS WHO ARE BLIND AND VISUALLY IMPAIRED. MY ORGANIZATION, THE NATIONAL CENTER FOR LAW AND ECONOMIC JUSTICE, HAS BEEN WORKING WITH LEGAL SERVICES OF NEW YORK CITY, THE DISABILITY RIGHTS EDUCATION DEFENSE FUND, THE LAW FOUNDATION OF THE SILICON VALLEY AND THE NATIONAL SENIOR CITIZENS LAW CENTER TO PRESS THE ADMINISTRATION TO COME INTO COMPLIANCE WITH SECTION 504.

AND WE HAVE A WELT OF EXPERTISE -- A WEALTH OF EXPERTISE ON DISABILITY RIGHTS LAW, SOCIAL SECURITY ADMINISTRATION PROGRAMS, AND THE EXPERIENCES OF CLIENTS IN THESE PROGRAMS.

WE HAVE ALREADY GIVEN SSA DETAILED RECOMMENDATIONS FOR THE STEPS YOU NEED TO TAKE IN CONDUCTING THE SELF-EVALUATION. WE PLAN TO PROVIDE ADDITIONAL COMMENTS.

I JUST WANT TO TOUCH ON SOME OF OUR KEY RECOMMENDATIONS.

NUMBER ONE, AS PART OF THE SELF-EVALUATION, THE AGENCY SHOULD CONDUCT A COMPREHENSIVE REVIEW OF ITS WRITTEN MATERIALS AND THEN REVISE THEM SO THAT THEY CLEARLY AND CONSISTENTLY INCORPORATE SECTION 504 REQUIREMENTS.

THEY DO NOT CURRENTLY DO THAT.

I'M GOING TO GIVE YOU TWO EXAMPLES.

THE SOCIAL SECURITY

ADMINISTRATION HANDBOOK SAYS THAT STAFF WILL GIVE ASSISTANCE TO PEOPLE WHO NEED HELP, BUT IT DOESN'T SAY THAT STAFF HAVE A LEGAL OBLIGATION TO HELP ANYONE WITH A DISABILITY WHO NEEDS IT AS AN ACCOMMODATION UNDER SECTION 504.

SECOND EXAMPLE, THE POMS, THE PROGRAMS OPERATIONAL MANUAL SYSTEMS, SAYS THAT STAFF WILL HELP MAKE EXCEPTIONS TO PROGRAM REQUIREMENTS AND FOR DIFFERENT PROGRAM REQUIREMENTS, IT SAYS IT WILL DO IT FOR SOMEONE WHO'S ILL OR SOMEONE IN POOR HEALTH OR SOMEONE WHO'S BED-RIDDEN OR SOMEONE WHO'S LEGALLY INCOMPETENT.

SECTION 504 REQUIRES THE AGENCY TO GIVE THAT HELP AND MAKE THOSE EXCEPTIONS TO ANYONE WITH A DISABILITY WHO NEEDS IT AS A REASONABLE ACCOMMODATION, BUT THAT'S NOT WHAT THE POMS SAYS. WE HAVE MANY OTHER EXAMPLES OF THESE PROBLEMS AND WE'VE SUBMITTED MANY OF THEM TO THE SOCIAL SECURITY ADMINISTRATION ALREADY.

>> MS. LESHEEN?

>> YES.

>> YOU'RE DOWN TO ONE MINUTE. I JUST WANT TO LET YOU KNOW.

>> OKAY.

WE ALSO BELIEVE THAT THE SELF-EVALUATION SHOULD LOOK AT THE AGREEMENTS THAT THE AGENCY HAS WITH THE OFFICE OF DISABILITY -- THE STATE OFFICES OF DISABILITY DETERMINATION. WHAT HAPPENED DO THOSE AGREEMENTS -- WHAT DO THOSE AGREEMENTS SAY ABOUT THE STATE AGENCY'S OBLIGATION TO COMPLY WITH 504?

DO THEY HAVE BOILER PLATE LANGUAGE?

THEY SHOULD OBVIOUSLY HAVE MORE THAN THAT.

THE STATE AGENCIES NEED TO KNOW WHAT IT IS THEY NEED TO DO TO

COMPLY WITH 504.

WE BELIEVE THAT YOU SHOULD ALSO TAKE A LOOK AT UNWRITTEN AND INFORMAL PRACTICES, WHAT GOES ON IN WAITING ROOMS, HOW ARE PEOPLE NOTIFIED IF THEY HAVE A VISION OR HEARING IMPAIRMENT.

[BEEP, BEEP, BEEP]

THAT THEY'RE READY TO BE SEEN, HOW ARE THEY NOTIFIED OF WHERE THE ACCESSIBLE BATHROOMS ARE, AND FINALLY, WE BELIEVE THE AGENCY SHOULD DEVELOP A STAND-ALONE, WRITTEN 504 POLICY, AND LET ME JUST SAY ONE MORE THING, WHICH IS THAT --

>> WE HAVE TO WRAP UP.

>> I'M SORRY.

>> THAT'S OKAY.

FINISH, BUT THIS HAS TO BE THE LAST POINT, PLEASE.

>> IT WILL BE.

>> OKAY.

>> THE 504 POLICIES AND PROCEDURES THAT THE AGENCY HAS SHOULD BE CONSISTENT ACROSS THE COUNTRY.

IN AT LEAST ONE INSTANCE THAT WE KNOW OF, THE AGENCY HAS MADE SIGNIFICANT IMPROVEMENTS IN PROCEDURES FOR SERVING INDIVIDUALS WITH DISABILITIES AND IN THIS CASE, PEOPLE WHO ARE DEAF AND HEARING-IMPAIRED, BUT IT'S DONE THAT ONLY IN SOME OFFICES.

IN MARCH, THE AGENCY ENTERED INTO A SETTLEMENT AGREEMENT WITH DEAF AND HEARING-IMPAIRED INDIVIDUALS WHO FILED COMPLAINTS, SECTION 504 COMPLAINTS WITH THE AGENCY.

THE AGREEMENT ONLY APPLIES AND ONLY REQUIRES THESE NEW COMPREHENSIVE PROCEDURES FOR SERVING THESE INDIVIDUALS IN SOME PARTS OF FLORIDA BECAUSE THAT'S WHERE THE COMPLAINANTS HAPPEN TO BE.

AND OBVIOUSLY, THERE ARE DEAF AND HEARING-IMPAIRED PEOPLE ALL OVER THE COUNTRY, SECTION 504

REQUIRES THE SAME THING
EVERYWHERE AND WE WOULD URGE THE
AGENCY TO IMPLEMENT THOSE SAME
POLICIES AND PROCEDURES IN
OFFICES NATIONWIDE.

THANK YOU.

THANK YOU FOR THE OPPORTUNITY TO
PROVIDE THESE COMMENTS.

>> THANK YOU VERY MUCH, MISS
LESHEEN.

I WISH WE COULD GIVE YOU NOR
TIME.

WE -- MORE TIME.

WE REALLY DO APPRECIATE IT.

OKAY, LET'S MOVE TO OUR FIRST
IN-PERSON COMMENTER OF THE
MORNING.

I HAVE MISS SUSAN PROCUP.

MISS PROCUP, WOULD YOU PLEASE
LET US KNOW WHAT ORGANIZATION
YOU REPRESENT AND REMEMBER YOU
HAVE FIVE MINUTES.

YOU MAY BEGIN NOW.

>> ALL RIGHT, THANK YOU VERY
MUCH.

>> YOU'RE WELCOME.

>> MY NAME IS SUSAN PROCUP AND
I'M REPRESENTING PARALYZED
VETERANS OF AMERICA TODAY.
AND WE DO APPRECIATE THE SOCIAL
SECURITY ADMINISTRATION'S
UNDERTAKING THIS SELF-EVALUATION
FOR 504 AND RECOGNIZING ITS
RESPONSIBILITY TO ENSURE THAT
ALL OF ITS COMPONENTS AND
OPERATIONS ARE ACCESSIBLE TO
PEOPLE WITH DISABILITIES.
WE NOTE THAT THE LANGUAGE USED
TO DESCRIBE PEOPLE WITH
DISABILITIES IN THE EXISTING
SELF-EVALUATION THAT WAS
PRODUCED BY HEALTH AND HUMAN
SERVICES IS CONSIDERABLY
OUTDATED, REFERENCES TO PEOPLE
WITH HANDY CAPS AND MENTAL RE --
HANDICAPS AND MENTAL RETARDATION
NEED TO BE UPDATED TO REFLECT
MORE MODERN AND CURRENT
TERMINOLOGY.

NOW, SOCIAL SECURITY INDICATES
IN ITS DOCUMENTS THAT WERE PUT
OUT FOR THIS EVALUATION, THAT IT

WILL DETERMINE WHETHER THE SOCIAL SECURITY ADMINISTRATION WILL CONDUCT REGULAR SELF-EVALUATIONS IN THE FUTURE. WE WOULD ENCOURAGE THE AGENCY TO CONSIDER PERIODIC SELF-EVALUATIONS NO MATTER THE OUTCOME OF THIS PARTICULAR EXERCISE.

EVEN THOUGH THE AGENCY INDICATES IT MAY USE THE CIVIL RIGHTS COMPLAINT PROCESS, INDIVIDUAL COMPLAINTS GOING TO OGC, AS A WAY TO MONITOR ITS COMPLIANCE, THIS APPROACH MAY NONETHELESS MISS PROBLEMS THAT ARE SERIOUS, EVEN THOUGH NO COMPLAINTS ARE FILED.

MOREOVER, PATTERNS OF DISCRIMINATORY PRACTICE ACROSS THE COUNTRY MAY NOT NECESSARILY BE DISCERNED FROM A REVIEW OF INDIVIDUAL COMPLAINTS.

IN ADDITION, SINCE THIS IS THE FIRST TIME THE AGENCY HAS UNDERTAKEN THIS SELF-EVALUATION, THE DISABILITY COMMUNITY MAY NOT NECESSARILY BE FAMILIAR WITH THE PROCESS FOR PROVIDING FEEDBACK TO THE AGENCY.

NOW, WHILE MEMBERS HAVE NOT VOICED ANY RECENT CONCERNS REGARDING THEIR EXPERIENCES WITH SOCIAL SECURITY PROGRAMS OR OFFICES, WE DID WANT TO OFFER A FEW OBSERVATIONS ABOUT THE CURRENT PART 85 BEING USED BY THE AGENCY.

SECTION 85-42, PROGRAM ACCESSIBILITY, EXISTING FACILITIES, IT REQUIRES THE AGENCY TO OPERATE ALL OF ITS PROGRAMS AND ACTIVITIES IN A MANNER THAT, VIEWED IN ITS ENTIRETY, ENSURES THEY'RE READILY ACCESSIBLE AND USEABLE BY PEOPLE WITH DISABILITIES AND THEN SETS OUT CERTAIN EXCEPTIONS.

WE WOULD NOTE THIS LANGUAGE IS SIMILAR TO THAT USED IN TITLE 2 OF THE ADA.

HOWEVER, THE ADA WAS FULLY IN EFFECT WHEN SOCIAL SECURITY BECAME AN INDEPENDENT AGENCY AND THE REVISED SELF-EVALUATION SHOULD REFLECT THE REQUIREMENT THAT AGENCY OFFICES NEWLY CONSTRUCTED OR SUBSTANTIALLY ALTERED SINCE 1995 SHOULD BE FULLY ACCESSIBLE TO PEOPLE WITH DISABILITIES.

WE ENCOUNTERED A BIT OF CONFUSION WITH REGARD TO 85-61 COMPLIANCE PROCEDURES BECAUSE IT REFERENCES PART 16-13 IN THE EEOC COMPLAINT PROCEDURE PROCESS.

16-13 DOES NOT APPEAR ON THE EEOC WEBSITE OR UNDER THE CODE OF FEDERAL REGULATIONS ONLINE, SO WE WOULD JUST ENCOURAGE SOCIAL SECURITY TO ENSURE IN ITS SELF-EVALUATION THAT ALL REFERENCES TO OTHER FEDERAL STATUTES ARE UP TO DATE.

AGAIN, MOST OF THE COURT CASES CITED IN THE CURRENT SELF-EVALUATION ARE PRE -- FROM THE MID 1980s AND WE JUST ENCOURAGE YOU TO MAKE SURE THAT CURRENT CASE LAW AND STATUTORY CHANGE ARE REFLECTED IN YOUR OWN SELF-EVALUATION.

WITH REGARD TO EMPLOYMENT OF PEOPLE WITH DISABILITIES BY THE AGENCY, WE SUGGEST THAT AN AREA FOR SELF-EXAMINATION IS -- SHOULD BE THE AVAILABLE AND PROVISION OF PERSONAL ATTENDANT SERVICES FOR SSA STAFF WITH DISABILITIES.

THERE ARE MANY FEDERAL -- THE FEDERAL GOVERNMENT HAS MADE PROGRESS IN SUPPLYING ASSISTIVE TECHNOLOGY, INTERPRETER SERVICES AND OTHER ACCOMMODATIONS, BUT PAS, PERSONAL ASSISTANT SERVICES REMAINS A GLARING OMISSION AMONG MANY AGENCIES.

>> NIS PROCUP, YOU'RE DOWN TO ONE MINUTE.

>> I UNDERSTAND.

AND A LOT OF PRIVATE

ORGANIZATIONS HAVE FOUND WAYS TO INCORPORATE PERSONAL ASSISTANT SERVICES INTO EXISTING POSITIONS OR USE PERSONAL CARE ATTENDANT FOR JOB TASKS BEYOND THOSE THAT THEY ARE PROVIDING TO THE EMPLOYEE WITH A DISABILITY.

SO WE WOULD JUST BELIEVE, OR PDA BELIEVES THAT PERSONAL ASSISTANT SERVICES AND THEIR COSTS WOULD BE MODEST FOR THE FEW EMPLOYEES WHO NEED IT WHEN COMPARED TO THE ADMINISTRATIVE BUDGET OF THE AGENCY, SO I WILL JUST CLOSE AND SAY THANK YOU FOR THIS OPPORTUNITY TO COMMENT ON YOUR SELF-EVALUATION.

WE ENCOURAGE YOU TO DISSEMINATE THE REPORT WIDELY WHEN IT IS COMPLETED, POST IT ON YOUR WEBSITE, AND TO CONTINUE THIS DIALOGUE WITH THE DISABILITY COMMUNITY ONGOING, AND WE WILL SEND IN OUR COMMENTS ELECTRONICALLY.

[BEEP, BEEP]

>> THANK YOU.

>> THANK YOU, MISS PROCUP.

WE REALLY APPRECIATE YOU PROVIDING YOUR COMMENTS TODAY AND THANK YOU TO ALL THE FOLKS WHO HAVE ALREADY TELECONFERENCED, THE FOLKS WHO ARE WITH US HERE IN ATTENDANCE AS WELL TO OBSERVE.

WE REALLY DO APPRECIATE YOU BEING A PART OF THE PROCESS TODAY.

ONE MORE HOUSEKEEPING ITEM BEFORE WE GO TO OUR NEXT PERSON VIA TELECONFERENCE.

AS A REMINDER, PLEASE TURN OFF ALL CELL PHONES OR SET THEM TO VIBRATE, PLEASE, SO AS NOT -- SO NOT TO DISTURB THE REST OF THE FORUM.

OKAY.

LET'S GO TO MR. CRAIG ACORN WHO WE HAVE VIA TELECONFERENCE.

MR. ACORN, ARE YOU THERE?

>> I AM.

>> OKAY.

THANK YOU FOR JOINING US THIS MORNING.

PLEASE, AGAIN, I REMIND YOU TO LET US KNOW THE ORGANIZATION THAT YOU REPRESENT AND REMEMBER THAT YOU HAVE FIVE MINUTES.

YOU MAY BEGIN.

>> THANK YOU, AND THANK YOU FOR THE OPPORTUNITY TO COMMENT. MY NAME IS CRAIG ACORN AND I'M THE MANAGING ATTORNEY AT THE NEW MEXICO CENTER ON LAW AND POVERTY, AND AGAIN, I APPRECIATE THE OPPORTUNITY TO ADDRESS SOCIAL SECURITY ABOUT SECTION 504 POLICY.

IT'S SOMETHING I HAVE WORKED ON BOTH IN NEW YORK AND IN CALIFORNIA, WORKING WITH PEOPLE WITH DISABILITIES WHO ARE APPLYING FOR AND RECEIVING SOCIAL SECURITY DISABILITY BENEFITS OF VARIOUS KINDS. AND WE HAVE BROAD EXPERIENCE IN WORKING WITH INDIVIDUAL CLIENTS IN SEEING THAT THEIR NEEDS WERE NOT ACCOMMODATED PREVIOUSLY BY SOCIAL SECURITY OFFICES LOCALLY AND NATIONALLY.

AND AS A RESULT OF THAT, WE BROUGHT THAT TO THE SOCIAL SECURITY ADMINISTRATION'S ATTENTION, AND WE BELIEVE THAT THE ADMINISTRATION NEEDS TO ESTABLISH A VERY VIGOROUS SECTION 504 SELF-EVALUATION AND COMPREHENSIVE POLICY FOR OBSERVING SECTION 504 POLICY. AND A COUPLE OF THINGS THAT I WANT TO MENTION IN PARTICULAR. ONE IS JUST THE FACT THAT PEOPLE ARE NOT AWARE OF WHAT A REASONABLE ACCOMMODATION OR MODIFICATION IS, AND SO IT'S -- YOU KNOW, WHILE MANY OF THE OFFICES WILL HAVE A SIGN, FOR EXAMPLE, SAYING THAT PEOPLE HAVE THE RIGHT TO AN ACCOMMODATION OR MODIFICATION UNDER SECTION 504, PEOPLE WHO WALK INTO THOSE OFFICES DON'T KNOW WHAT THAT MEANS AND VERY OFTEN THE PEOPLE

WHO WORK IN THOSE OFFICES DON'T KNOW WHAT THAT MEANS.

AND WITHOUT EXPLICIT DIRECTION AND EXAMPLES OF WHAT ARE THE KIND OF THINGS THAT PEOPLE ARE ENTITLED TO ASK FOR, THEY'RE VERY LIKELY NOT TO GET THEM.

AND SO ACCOMMODATION OF INFORMING THE PUBLIC THAT THE CLIENTELE OF SOCIAL SECURITY ADMINISTRATION AND IN TRAINING THE PEOPLE WHO WORK THERE IS NECESSARY.

AND SO SOME OF THE THINGS THAT ARE REQUIRED AND THAT OUGHT TO BE OFFERED TO PEOPLE WHO ARE COMING IN IS ASSISTANCE TO COMPLETE ALL NECESSARY FORMS, AND THAT WOULD INCLUDE APPEALS OF ADVERSE DETERMINATIONS. PEOPLE NEED TO KNOW THAT THEY CAN ASK FOR ASSISTANCE TO GATHER INFORMATION, WHETHER IT'S IDENTIFICATION INFORMATION, WHETHER -- AND THIS IS PROBABLY MOST IMPORTANT, HEALTH-RELATED INFORMATION THAT WOULD DOCUMENT THEIR DISABILITY, THAT SORT OF THING.

PEOPLE NEED TO KNOW THAT THEY HAVE THE RIGHT TO ASK FOR ASSISTANCE IN CHALLENGING THE ACCURACY OF INFORMATION THAT SOCIAL SECURITY HAS DETERMINED. THEY HAVE A RIGHT TO ASK FOR SUBSTITUTION OF A HOME VISIT FOR PEOPLE WHO ARE UNABLE TO COME TO AN OFFICE OR A SPECIFIC APPOINTMENT TIME IF THEY ARE UNABLE TO SIT IN A CROWDED OFFICE FOR A LENGTH OF TIME THAT IS AFFECTED BY THEIR DISABILITY. SO THOSE ARE A FEW OF THE THINGS.

THESE KIND OF NOTICES NEED TO BE POSTED IN THE OFFICE, IN THE OFFICE VERY CLEARLY AND, AGAIN, I THINK THERE'S A COMBINATION THAT NEEDS TO HAPPEN OF BOTH THE CLIENTS WHO ARE APPROACHING THE OFFICE NEED TO KNOW WHAT THEY CAN ASK FOR AND MAYBE MORE

IMPORTANTLY, THE LINE STAFF IN THESE OFFICES NEED TO BE TRAINED EFFECTIVELY.

AND THAT CAN ONLY HAPPEN IF THERE'S A COMPREHENSIVE POLICY IN WRITING THAT IS ESTABLISHED AT THE FEDERAL LEVEL AND THEN DISSEMINATED TO THE LOCAL OR REGIONAL OFFICES.

>> MR. ACORN, YOU'RE DOWN TO ONE MINUTE.

>> OKAY.

SO WE WOULD ASK THAT THE SOCIAL SECURITY ADMINISTRATION, IN ADDITION TO DOING THE SELF-EVALUATION AND CREATING THE COMPREHENSIVE POLICY, THAT IT DO A MAILING TO PARTICIPANTS ON THEIR RIGHTS THAT IS VERY EXPLICIT AND DETAILED AND CREATE POSTERS THAT ARE EXPLICIT AS WELL, THAT CAN BE POSTED IN ALL OF THE OFFICES, AND MOST IMPORTANTLY, ENSURE THAT LINE STAFF ARE TRAINED EFFECTIVELY AND THAT THEIR TRAINING -- THE RESULTS OF THAT TRAINING IS MONITORED ON AN ONGOING BASIS TO ENSURE THAT PEOPLE COMING IN TO THE OFFICE WITH DISABILITIES ARE AFFORDED ALL OF THE REASONABLE ACCOMMODATIONS AND MODIFICATIONS TO WHICH THEY'RE ENTITLED.

SO THANK YOU VERY MUCH FOR YOUR TIME AND INTEREST.

[BEEP, BEEP]

>> THANK YOU VERY MUCH, MR. ACORN.

YOU'RE RIGHT ON TIME.

>> THANKS.

>> OKAY.

ONE OTHER REMINDER BEFORE WE CONTINUE WITH OUR NEXT TELECONFERENCE COMMENTER.

VERY IMPORTANT FOR THOSE FOLKS WHO HAVE ALREADY COMMENTED TODAY OR ARE WATCHING LIVE VIA WEBCAST OR WOULD LIKE TO COMMENT.

YOU HAVE UNTIL NOVEMBER 15th TO DO SO, 90 DAYS FROM TODAY, AND WE ENCOURAGE YOU TO SUBMIT COMMENTS AT WWW.REGULATIONS.GOV.

AGAIN, WWW.REGULATIONS.GOV.
AND SEARCH FOR DOCKET
ID SSA-2011-0035.

AGAIN, THAT'S DOCKET
ID SSA-2011-0035.

OKAY.

OUR NEXT COMMENTER VIA
TELECONFERENCE IS MR. KEVIN LEIB
MAN.

I BELIEVE THAT'S HOW YOU
PRONOUNCE YOUR LAST NAME.
PLEASE CORRECT ME IF I'M WRONG.
MR. LEIBMANN, IF YOU WOULD LET
US KNOW WHAT ORGANIZATION YOU
REPRESENT AND REMEMBER THAT YOU
HAVE FIVE MINUTES.
THANK YOU.

>> YES, THANK YOU.

>> ARE YOU THERE?

>> YES.

THIS IS KEVIN LEIBKMAN FROM
LEGAL SERVICES OF NEW JERSEY.
WE'RE A NOT-FOR-PROFIT COMPANY
PROVIDING PEOPLE WITH PREHELD
HELP FOR PEOPLE WITH LOW INCOMES
AND PEOPLE WITH DISABILITIES.

>> THANK YOU, YOU MAY BEGIN.

>> OKAY.

YES, I AGREE WITH MANY OF THE
COMMENTS BY MR. ACORN.

PROACTIVE DISABILITY
ACCOMMODATION POLICIES AND
PRACTICES ARE NEEDED.

MANY PEOPLE WITH DISABILITIES,
ESPECIALLY THE KNEWLY DISABLED,
MAY NEED ACCESSIBLE SERVICES AND
ACCOMMODATIONS BUT NOT KNOW HOW
THEY CAN ASK FOR THEM AND IF YOU
DEVELOP SECTION 504 NOTICES
WHICH PROACTIVELY INFORM
BENEFICIARIES AND APPLICANTS,
THAT WOULD HELP, AND PROMINENTLY
DISPLAY THEM AT SOCIAL SECURITY
OFFICES AND COPY THEM TO
CORRESPONDENTS IN EARLY
CORRESPONDENCE IN THE CLAIMS.
ALSO, WE RECOMMEND THAT YOU
DEVELOP A FORM TO REQUESTING
DISABILITY ACCOMMODATION.

SSA HAS A FORM FOR DISABILITY
DISCRIMINATION COMPLAINTS, WHICH
IS MORE REACTIVE, BUT A

PROACTIVE APPROACH COULD HELP PREVENT DISCRIMINATION AND PROMOTE BETTER SECTION 504 COMPLIANCE.

NEXT, SOCIAL SECURITY WOULD BENEFIT FROM A TWO-PRONGED APPROACH TO DEVELOPING SECTION 504 COMPLIANCE POLICIES.

OF COURSE, YOU NEED YOUR OWN SECTION 504 REGULATIONS CONTAINING BROAD LANGUAGE TO MAKE SURE WORKERS UNDERSTAND THE NEED FOR INDIVIDUALIZED DETERMINATIONS OF WHAT ACCOMMODATIONS MIGHT BE REQUIRED, BUT SECOND, YOU COULD PROVIDE MORE GUIDANCE FOR SPECIFIC DISABILITY CATEGORIES. LIKE WHAT YOU ALREADY HAVE FOR DEAF INDIVIDUALS AND PEOPLE WITH VISUAL IMPAIRMENTS.

YOUR RULES SHOULD PROVIDE FOR FLEXIBLE RESPONSES TO ACCOMMODATION REQUESTS AND IDEALLY, THE INFORMATION SHOULD BE EASILY AVAILABLE TO CASEWORKERS WHEN SERVING PEOPLE WITH DISABILITIES.

NEXT, OF COURSE, EFFECTIVE 504 COMPLIANCE REQUIRES STAFF TRAINING.

SSA SHOULD CERTAINLY CONSIDERING WORKING WITH LOCAL AND REGIONAL RESOURCES LIKE LEGAL SERVICES, PROTECTION AND ADVOCACY, AND OTHER DISABILITY RIGHTS ORGANIZATIONS LIKE THE ONE MENTIONED BY MISS LESHEEN IN HER EARLIER COMMENTS.

THEY CAN NOT ONLY HELP TRAIN LOCAL SSA STAFF, BUT THEY CAN ALSO HELP ASSESS COMPLIANCE IN YOUR LOCAL OFFICES.

WE RECOMMEND A POLICY OF HAVING LOCALLY DESIGNATED SECTION 504 COORDINATOR AT SSA OFFICES WHO COULD ENSURE SECTION 504 NOTICES ARE POSTED, PROVIDE TRAINING, COLLABORATE WITH LOCAL PARTNERS, AND ASSIST IN DISABILITY ACCOMMODATION REQUESTS.

JUST LIKE MR. ACORN MENTIONED,

PEOPLE WITH DISABILITIES OFTEN HAVE DIFFICULTY UNDERSTANDING COMPLEX SSA RULES AND NOTICES, AND CAN CAUSE UNINTENTIONAL NONCOMPLIANCE WITH AGENCY RULES OR FAILURE TO ADEQUATELY DOCUMENT CLAIMS.

AND THAT LEADS TO ADVERSE CLAIM CONSEQUENCES, WE ENCOURAGE SOCIAL SECURITY TO CONTINUE LIBERALLY ACCOMMODATING PEOPLE WITH DISABILITIES AS PART OF ITS SECTION 504 ORGANIZATIONS.

ONE AREA WE HAVE A WHOLE LOT OF KNOWLEDGE IS WE'RE ADVOCATES WITH PEOPLE WITH LIMITED MEANS AND WHO HAVE DISABILITIES AND WE RECOGNIZE THERE'S A STRONG STATISTICAL CORRELATION BETWEEN POVERTY AND DISABILITY.

WHEN PEOPLE IN POVERTY ARE DISADVANTAGED IN A CLAIMS PROCESS, IT CAN THUS HAVE A DISPARATE IMPACT AGAINST PEOPLE WITH DISABILITIES, AND WE URGE SSA TO CONSIDER IMPLEMENTING SECTION 504 POLICIES TAILORED TO PREVENT ANY SUCH DISPARATE DISABILITY DISCRIMINATION. DOING THINGS LIKE HELPING CLAIMANTS GET MEDICAL RECORDS WHICH THEY CAN'T AFFORD CAN REALLY HELP THEM IN MANY CIRCUMSTANCES.

ALSO, WE NOTICE THAT THERE IS SOME AREAS WHERE SOCIAL SECURITY POLICIES ACTUALLY IMPACT PEOPLE WHO ARE IN POVERTY AND HAVE DISABILITIES.

FOR INSTANCE, SOME SSA ADD JUDGE CATERERS HAVE A PRACTICE OF FINDING DISABILITY CLAIMANTS WHO ARE IMPOVERISHED, WHO HAVE POOR EARNINGS HISTORY LESS CREDIBLE THAN OTHER PEOPLE, CITING AGENCY RULES, OR SOCIAL SECURITY RULING 96-7-P.

PEOPLE WITH DISABILITIES ARE OFTEN IMPOVERISHED OR HAVE A POOR EARNINGS HISTORY BECAUSE OF THEIR DISABILITY AND NOT THROUGH ANY FALLS OF THEIR OWN AND

SHOULD NOT BE JUDGED WITH A
DIFFERENT CREDIBILITY STANDARD
ON THAT ACCOUNT.

>> SIR, YOU'RE DOWN TO ONE
MINUTE.

>> OKAY.

THANK YOU.

THESE RULES, LIKE THE ONES I
MENTIONED, COULD BE ALTERED TO
INCLUDE GUIDANCE THAT WOULD
AVOID ANY DISABILITY
DISCRIMINATION UNDER SECTION
504.

SO WE URGE THE AGENCY, WHEN YOU
LOOK AT YOUR POLICIES FOR
SECTION 504 COMPLIANCE, BE AWARE
OF THAT LINK BETWEEN POVERTY AND
DISABILITY.

THANK YOU VERY MUCH.

>> THANK YOU VERY MUCH

MR. LEIBKMAN.

WE REALLY APPRECIATE YOUR
COMMENTS THIS MORNING.

OKAY, I THINK WE'RE GOING TO
TAKE A QUICK 10-MINUTE BREAK, 10
TO 15-MINUTE BREAK, AND THEN
WE'LL RESUME WITH OUR
TELECONFERENCE COMMENTERS AT THE
CONCLUSION OF THE BREAK.

THANK YOU.

PLEASE STAND BY.

PLEASE STAND BY.

THIS EVENT WILL RESUME SHORTLY.

>> GOOD MORNING.

WELCOME BACK TO OUR PUBLIC
FORUM, SECTION 504
SELF-EVALUATION ON POLICY AND
FACILITIES.

WE'RE GOING TO GET RIGHT INTO
OUR NEXT AT THE LE CONFERENCE
COMMENT -- TELECONFERENCE
COMMENTER.

THAT IS A MISS MEGAN MARSH.
PLEASE IDENTIFY THE ORGANIZATION
THAT YOU REPRESENT AND PLEASE
REMEMBER THAT YOU HAVE FIVE
MINUTES.

YOU MAY BEGIN.

>> HI, THANK YOU.

I'M WITH THE MARYLAND DISABILITY
LAW CENTER.

WE'RE THE PROTECTION AND
ADVOCACY ORGANIZATION IN
MARYLAND, AND I WOULD LIKE TO
MAKE MY COMMENTS CENTER AROUND
TWO ISSUES CONCERNING FACILITIES
AND POLICIES.

THE FIRST IS THE WAIT TIME AT
THE LOCAL OFFICES, THE LENGTH OF
THE WAIT, AND THE FACT THAT ALL
THE PEOPLE IN THE WAITING ROOM
MUST SIT ACCORDING TO THE
SECURITY GUARDS.

I DON'T KNOW IF THAT'S
NATIONWIDE, BUT IN ALL OF OUR
LOCAL OFFICES, THAT'S TRUE.
AND FOR PEOPLE WITH
DISABILITIES, THIS IS PRESENTING
A FAIRLY SIGNIFICANT HARDSHIP.
BOTH IN THE FACT THAT THEY HAVE
TENUOUS JOBS AND THEY WIND UP
TAKING OFF VIRTUALLY A WHOLE DAY
TO DO SOMETHING AS SIMPLE AS
DROP OFF A FORM, TAKE A NUMBER,
WAIT TO BE HEARD, TOLD TO SIT
BACK DOWN, WAIT FOR SOMEONE
ELSE, ETCETERA.

AND FOR THE PEOPLE WITH PHYSICAL
DISABILITIES THAT CANNOT
COMFORTABLY SIT, MIGHT NEED TO
BE WALKING AROUND, MIGHT NEED TO
BE TAKING MEDICINE AND I'M
TALKING, YOU KNOW, THREE, FOUR,
FIVE HOURS THAT SOMETIMES PEOPLE
ARE SITTING IN THE WAITING
ROOMS, CAUSING THEY WILL
PHYSICAL DISCOMFORT AS WELL AS A
CONSIDERABLE AMOUNT OF
INCONVENIENCE FOR THEIR JOBS.

THE SECOND GENERAL ISSUE I
WANTED TO TALK ABOUT CONCERNING
POLICY IS THE LENGTH OF TIME IT
TAKES SOCIAL SECURITY TO
DISCOVER OVERPAYMENTS, WHICH IS

SOMETIMES IN EXCESS OF FIVE YEARS, AND THE EFFECT THAT THAT HAS ON ESSENTIALLY PREVENTING PEOPLE WITH DISABILITIES FROM ACCESSING THE SERVICES OF SOCIAL SECURITY.

WE'RE NOT ABLE TO TAKE ADVANTAGE OF MANY OF THE PROGRAMS, THE EXPEDITED REINSTATEMENT, AND THE PRETTY -- PRETTY GOOD PROGRAMS THAT SOCIAL SECURITY HAS SET UP TO ALLOW PEOPLE ACCESS TO BENEFITS, IF EVERYTHING GOES ACCORDING TO PLAN.

BUT BECAUSE OF THE LENGTH OF TIME IT TAKES SOCIAL SECURITY TO DISCOVER THE OVERPAYMENTS, AS I SAID, IT'S SOMETIMES IN EXCESS OF FIVE YEARS, THAT PEOPLE REALLY ARE OFTENTIMES DENIED ACCESS TO USE SOME OF THOSE SERVICES, PROGRAMS, BRIDGES, INCENTIVES, ETCETERA, THAT SOCIAL SECURITY HAS SET UP. AND THAT'S IT IN A NUTSHELL. I DON'T WANT TO GO ON LONGER THAN I HAVE TO, BUT THOSE ARE THE TWO ISSUES THAT WE'RE VERY CONCERNED ABOUT CONCERNING FACILITIES AND POLICY.

SO THANK YOU FOR YOUR TIME.

>> THANK YOU FOR YOUR COMMENTS, MEGAN.

YOU HAVE 2 1/2 MINUTES LEFT, BUT IF YOU CHOOSE TO HANG UP NOW, THAT'S FINE TOO.

>> I THINK I WOULD JUST BE REDUNDANT IF I USED IT, SO I'LL JUST END THERE.

THANK YOU.

>> UNDERSTOOD, UNDERSTOOD. THANK YOU FOR YOUR COMMENTS. WE REALLY DO APPRECIATE YOU.

>> THANK YOU.

OKAY, PLEASE STAND BY FOR A FEW MOMENTS, FOLKS.

BE PATIENT WITH US AS WE WAIT TO TELECONFERENCE WITH OUR NEXT COMMENTER.

THANK YOU.

PLEASE STAND BY.

THIS EVENT WILL RESUME SHORTLY.

PLEASE STAND BY.
THIS EVENT WILL RESUME SHORTLY.
PLEASE STAND BY.
THIS EVENT WILL RESUME SHORTLY.
PLEASE STAND BY.
THIS EVENT WILL RESUME SHORTLY.
PLEASE STAND BY.
THIS EVENT WILL RESUME SHORTLY.
PLEASE STAND BY.
THIS EVENT WILL RESUME SHORTLY.
PLEASE STAND BY.
THIS EVENT WILL RESUME SHORTLY.
>>> WELCOME BACK TO OUR SECTION
504 SELF-EVALUATION PUBLIC FORUM
ON POLICY AND FACILITIES.
I JUST WANTED TO COME BACK AND
TELL YOU ALL WE'RE GOING TO
FORMALLY BREAK FOR ABOUT TEN
MINUTES.
OUR NEXT CALLER VIA
TELECONFERENCE IS NOT SCHEDULED
UNTIL 11:00 AND I DIDN'T WANT TO
KEEP YOU ALL WAITING IN STAND BY
MODE FOR ANOTHER TEN MINUTES.
SO LET'S BREAK TO ANOTHER TEN
MINUTES FORMALLY AND WE'LL
RESUME AT 11:00.
THANK YOU.

>>> Good morning.
I appreciate you all's patience
and waiting as we connect with
our next teleconference
commenter, and we will get right
into that.
Our next commenter is a Mr. Joe
McIntyre.
Mr. McIntyre, good morning, and
please identify the organization
that you represent and remember
that you have five minutes.
You may begin.
>> Good morning.
I'm with the national senior
citizens law center in Los
Angeles, and I will keep my
comments quite brief.
The national senior citizens law
center has worked to promote the
independence and well being of
the low income elderly and people
with disabilities.

Since its beginnings, a major part of that advocacy has been Social Security, SSI and Medicare.

Our interest has been in the substance of these programs and just as important access to them. Social Security Administration has contact with more people with disabilities than any government agency.

In fact no government agency even comes close, more than 6 million people receive SSI on the basis of disability, even more receive SSDI.

However.

That is just the tip of the iceberg.

Many millions more are receiving benefits on a basis other than disability, and most notably, the biggest group, Social Security retirement, but have disabilities every bit as significant and as people age they develop serious disability impairments and as an advanced age we see impairments and dementia to name a few.

We have often partnered with disability organizations in our advocacy efforts.

Because of the large size of the Social Security Administration, and because of the specialized nature of SSA's programs, the need for accommodation outside the disability programs, SSI disability or disability insurance is most often overlooked.

This was vivid to me in the response for the need for accessible communications for people with visual impairments, and the overwhelming majority of whom are receiving Social Security retirement benefits, and most of them a very advanced age. Only very small percentage were actually receiving on the basis of blindness or SSI on the basis

of blindness.

Yet, it was only after several years of litigation that SSA finally recognized its obligation to provide accessible notices to this population.

What we would like to see is for SSA to take the initiative to identify needs for accommodation for other groups.

We recognize there are significant challenges, problems related to people with disabilities in these other programs.

Audio difficulties.

Captioning will resume shortly.

>>> Thank you, Mr. McIntyre, for your comments.

We really do appreciate having you this morning.

Please stand by for a few moments while we get ready for our next commenter.

Thank you.

>>> Okay.

Welcome back.

We are very pleased to welcome our next commenter.

It's Mr. Howard GAREL.

I would ask that you please identify the organization that you represent and please remember that you have five minutes to comment.

Good morning, and you may begin.

>> Okay.

Hello.

My name is Howard GAREL.

I'm representing myself, no organization.

A few years back, my purpose of coming here, let me explain to you, was I would like an amendment regarding the video recordings during hearings before administrative law judges.

Back in 2006, I attended a hearing, and an interpreter was present in front of the ALJ.

They had a vocational evaluator, which is not part of the point

here, but the discussion was going on, and an hour later, the judge had done a fantastic job listening to my comments, and the interpreter was providing the interpretation of the hearing appropriately, and I appealed to the next staff, and it was denied, and it went to the council.

One year later, they rejected me, my motion, and I appealed to the U.S. district court.

That appeal at that time with Social Security Administration responded and the answer that I got, they said that it was a motion to remand because they could not find the recording of that day, which came as a shock to me, and I felt it was a waste at that time, and one year had passed without a response.

Two years later, no response still.

And I just celebrated my 66th birthday and receiving Social Security submitted a motion, and it was to show cost and to set up the de novo hearing, and 10 days later they found a recording, so the motion was to reopen, got approved, and the transcript came in, and now mind you, this is four years after the event.

And I used to be a VR counselor, and I have had a lot of experience with hearings, and in people who are low functioning, and deaf people who are low functioning, and ALJ should have included the recording of the interpreter and myself during the hearing, just as they are doing currently right now.

So my motion there was if a person is requesting that to be videoed it's to be respected.

That's my comment.

Thank you.

>> Thank you for the comment.

As you know, if you -- the public

forum is not the avenue for us to respond or answer questions about individual cases, so the question you had about why did it take so long, we would not be able to respond to that appropriately here.

>> I understand.

>> But nonetheless, your comments are obviously taken very seriously, and we will take those back with us and assess them after today's forum.

>> This is just for future record.

That wasn't to be answered now. I just want it to be documented. It's too late for my case.

>> Thank you Mr. GAREL.

We appreciate your comments.

>> Thank you.

>> Thank you.

>> Okay.

I'm going to ask those folks in attendance and zeros watching via webcast be patient as we ask you to stand by as we prepare for our next teleconference commenter.

Thank you.

Please stand by.

Captioning will resume shortly.

Please stand by, captioning will resume shortly.

>>> Welcome back to the Social Security Administration section 504 self-evaluation on policy and facilities.

I appreciate everyone's patience, by the way.

We will break for lunch now, and we will resume at 1:00 eastern time.

We will resume with more folks via teleconference to comment at that time.

But rather than keep everyone in

suspense or on hold, we will
break for lunch now and resume at
1:00 p.m. eastern time.
Thank you.

>>> GOOD AFTERNOON, AND
WELCOME BACK TO SOCIAL
SECURITY ADMINISTRATION'S
SECTION 504 SELF-EVALUATION
PUBLIC FORUM ON FACILITIES AND
POLICY.

WE'RE GOING TO JUMP RIGHT INTO
OUR COMMENTS FROM OUR NEXT
TELECONFERENCE PERSON, AND
THAT IS A MR. STEVE WEISS.
MR. WEISS, IF YOU WOULD PLEASE
IDENTIFY THE ORGANIZATION THAT
YOU REPRESENT AND PLEASE
REMEMBER THAT YOU HAVE FIVE
MINUTES.

YOU MAY BEGIN.

>> GREAT, THANK YOU.

MY NAME IS STEVE WEISS, I'M
WITH BAY AREA LEGAL AID IN
OAKLAND, CALIFORNIA, WE ALSO
HAVE OFFICES THROUGHOUT THE
BAY AREA.

AND I HAVE WHAT MAY BE A
DIFFERENT ISSUE THAN PRIMARILY
DISCUSSED, WHICH IS THE
APPLICATION OF 504 TO
ACTIVITIES OF THE OFFICE OF
INSPECTOR GENERAL.

IN MY EXPERIENCE WITH OIG HAS
BEEN MOSTLY RELATED TO CLAIMS
AND INVESTIGATIONS OF REFUGEES
IN THE BAY AREA, MOSTLY
CAMBODIAN AND VIETNAMESE
REFUGEES WHO HAVE
POSTTRAUMATIC STRESS RELATED
TO THE WAR, AND THE
INVESTIGATIONS HERE HAVE
TARGETED THESE POPULATIONS FOR
WHAT I THINK ARE FRIVOLOUS
REASONS, THERE ARE TRIGGERS
FOR THESE INVESTIGATIONS BASED
ON HAVING SIMILAR DIAGNOSES,
SAME CLINICIAN WITH SIMILAR
DIAGNOSES, SO YOU HAVE A
CLINICIAN WHO IS FOCUSED ON
SERVING THIS COMMUNITY, MOST

OF THEIR PATIENTS HAVE
DEPRESSION AND PTSD AND THAT
TRIGGERS AN INVESTIGATION, OR
MULTIPLE FAMILY MEMBERS
APPLYING CAN TRIGGER AN
INVESTIGATION, WHICH WOULD NOT
BE SURPRISING IF THE WHOLE
FAMILY SURVIVED THE
KAMIR ROUGE AND WAS IN REFUGEE
CAMPS.

THE INVESTIGATIONS THEMSELVES
HAVE BEEN TROUBLESOME AND
THANKFULLY THEY'VE SLOWED DOWN
THE LAST FEW YEARS, BUT THE
NATURE OF THE INVESTIGATIONS,
I THINK, IS A CONCERN THAT WE
FEEL DID NOT COMPLY WITH 504
AND KIND OF THE SORT OF THINGS
WE'VE SEEN BY OAG IS CERTAINLY
NOT ACCOMMODATING MENTAL
HEALTH, YOU KNOW, COMING TO
THE DOORS OF PEOPLE WHO ARE
KNOWN REFUGEES, WHO HAVE
SURVIVED TRAUMA, AND COMING TO
THEIR HOMES, YOU KNOW, AS IF
THEY ARE THE POLICE, AND, YOU
KNOW, NOT CLEARLY TELLING THEM
WHO THEY ARE AND THAT THEY
DON'T HAVE TO SPEAK WITH THEM
IF THEY DON'T WANT TO, THEY
DON'T HAVE TO LET THEM IN
THEIR HOMES, FORCING THEIR WAY
INTO THEIR HOMES, YOU KNOW,
BEING ARMED WHEN DEALING WITH
A SURVIVOR OF TRAUMA AND
FORCING YOUR WAY INTO THEIR
HOME, NOT USING APPROPRIATE
LANGUAGE ACCESS, KIND OF
HEIGHTENS THAT FEELING OF --
THEIR MENTAL HEALTH CONCERNS.
THEY DON'T REALLY KNOW WHAT'S
GOING ON, AND USING FAMILY
MEMBERS FOR TRANSLATION RATHER
THAN HAVING AN INTERPRETER TO
CLEARLY EXPLAIN WHAT THE
SITUATION IS AND WHO THEY ARE,
THINGS LIKE THAT, AND YELLING
AT PEOPLE IN ENGLISH, YOU
KNOW, YOU UNDERSTAND ENGLISH,
DON'T YOU?
YOU UNDERSTAND ENGLISH?
THINGS LIKE THAT ARE AT THE

VERY LEAST INSENSITIVE TO THE CLAIMANT'S MENTAL HEALTH. SO THAT'S THE GENERAL ISSUE I WANTED TO RAISE.

>> MR. WEISS, YOU HAVE ABOUT A MINUTE AND 30 SECONDS LEFT, IF YOU HAVE ANY ADDITIONAL COMMENTS YOU WOULD LIKE TO ADD.

>> I DON'T KNOW IF ITS IT'S SUPPOSED TO BE INTERACTIVE OR NOT.

I'M HAPPY IF THERE IS A FOLLOW-UP QUESTION FOR CLARIFICATION.

I ALSO HAVE A FEW KIND OF LAW REVIEW ARTICLES THAT HAVE BEEN WRITTEN BY LAW CLERKS IN THE BAY AREA ON THIS SUBJECT THAT GOES INTO MORE DETAIL ABOUT THE ISSUES THAT I CAN POST TO THE SITE AFTERWARDS.

>> I WOULD ENCOURAGE YOU TO DO THAT.

THIS IS NOT INTERACTIVE IN THE SENSE THAT WE WILL ARE BE RESPONDING TO THE COMMENTS THAT YOU'RE MAKING TODAY. WE CAN CERTAINLY RESPOND IF THERE ARE AREAS THAT NEED TO BE CLARIFIED, BUT FOR THE MOST PART, WE'RE JUST RECEIVING YOUR COMMENTS THIS AFTERNOON.

>> OKAY.

I'LL POST THOSE REPORTS AFTERWARDS.

>> PLEASE DO.

I WOULD APPRECIATE THAT.

>> GREAT.

THANK YOU.

>> THANK YOU, MR. WEISS, WE APPRECIATE IT.

>> OKAY.

LET'S MOVE ON AND TRANSITION TO OUR VERY NEXT TELECONFERENCE COMMENTER, I HAVE A MR. STEVE COFELL. PLEASE IDENTIFY THE ORGANIZATION YOU REPRESENT AND PLEASE REMEMBER THAT YOU HAVE FIVE MINUTES. YOUR TIME BEGINS NOW.

>> THANK YOU.

YES, MY NAME IS STEVE COFELL,
PRESIDENT OF AMERICAN
FEDERATION OF GOVERNMENT
EMPLOYEES LOCAL 3937.

WE ARE THE UNION THAT
REPRESENTS SOCIAL SECURITY
ADMINISTRATION EMPLOYEES WHO
WORK IN ALASKA, IDAHO, OREGON
AND WASHINGTON.

I AM ALSO NEARLY 38-YEAR
EMPLOYEE OF SOCIAL SECURITY
MYSELF.

I AM ALSO ACTIVE WITH A
COALITION ORGANIZATION IN MY
STATE OF WASHINGTON CALLED
SOCIAL SECURITY WORKS
WASHINGTON AND WE ARE A
COALITION OF 35 ORGANIZATIONS
THAT WORK AS ADVOCATES FOR THE
PROGRAM OF THE PEOPLE THAT ARE
SERVED BY THE SOCIAL SECURITY
PROGRAM.

WE ARE CURRENTLY VERY
CONCERNED AND VERY ACTIVELY
ENGAGED IN ADDRESSING AN ISSUE
THAT HAS BEEN CREATED BY THE
SOCIAL SECURITY
ADMINISTRATION'S DECISION TO
CLOSE TWO OF OUR SEATTLE FIELD
OFFICES AND TO MOVE THE
PERSONNEL FROM THOSE OFFICES
ONTO THE NINTH FLOOR OF THE
JACKSON FEDERAL BUILDING IN
SEATTLE.

THIS CREATES SERIOUS ACCESS
PROBLEMS FOR DISABLED CLIENTS
AS COMPARED TO OUR CURRENT
SITUATION.

ONE.

OFFICES -- ONE OF THE OFFICES
CURRENTLY HAS FREE PARKING
CONTIGUOUS TO THE OFFICE, THE
OTHER HAS LOW-COST PARKING
CONTIGUOUS TO THE OFFICE FOR
VISITORS.

THE JACKSON FEDERAL BUILDING
HAS NO PARKING.

THERE ARE VERY EXPENSIVE
COMMERCIAL GARAGES IN THE AREA
WITHIN SEVERAL BLOCKS OF THE
BUILDING, BUT NOTHING CLOSE TO

THE BUILDING FOR THE
HANDICAPPED PUBLIC TO USE
EXCEPT FOR TWO HANDICAPPED
SPACES ON THE STREETS AROUND
THE BUILDING.

CURRENTLY THE TWO FIELD
OFFICES SERVE APPROXIMATELY
300 VISITORS A DAY.

IF THIS MOVE GOES THROUGH AND
300 VISITORS A DAY ATTEMPT TO
ACCESS SERVICES THROUGH THE
FEDERAL BUILDING, THEY WILL
HAVE GREAT DIFFICULTY,
PARTICULARLY AMONG THE
DISABLED IN FINDING PARKING
THAT THEY CAN AFFORD TO PAY
FOR.

THE STREETS IN THE AREA ARE
VERY STEEP, AND EVEN THOSE
PEOPLE WHO FIND HANDICAPPED
PARKING WILL HAVE GREAT
DIFFICULTY GETTING TO THE
BUILDING AT ALL.

WHEN THEY GET TO THE BUILDING
THEY WILL THEN FIND THAT
BECAUSE THE JACKSON FEDERAL
BUILDING IS A LEVEL FOUR HIGH
SECURITY FEDERAL BUILDING THEY
WILL NEED TO WAIT IN LONG
LINES IN OUR QUITE OFTEN
MISERABLE WEATHER TO GET INTO
THE BUILDING TO GO THROUGH THE
METAL DETECTORS, TO GO THROUGH
X-RAY MACHINES, AND FOR THEIR
IDENTIFICATION TO BE CHECKED
BY SECURITY GUARDS.

THIS IS GOING TO CREATE
SERIOUS PROBLEMS FOR THOSE
WITH PHYSICAL DISABILITIES.
THERE WILL ALSO BE A PROBLEM
FOR PEOPLE WITH MENTAL
DISABILITIES.

MANY OF OUR CLIENTS ARE
HOMELESS, HOMELESS VETERANS,
OTHER PEOPLE WHO LIVE ON THE
STREETS, LOW-INCOME PEOPLE,
IMMIGRANTS, TRANSIENTS, AND A
LARGE NUMBER OF PEOPLE WHO DO
NOT HAVE THE REQUIRED FEDERAL
OR STATE I.D. TO EVEN ACCESS
THE BUILDING AND RECEIVE
SERVICES FACE-TO-FACE WITH

SOCIAL SECURITY EMPLOYEES.
SO WE OPPOSE THIS ACTION BY
THE AGENCY, AND WE'RE ACTIVELY
ENGAGED IN INFORMING THE
COMMUNITY ABOUT THESE ISSUES
AND GETTING SUPPORT FROM OTHER
ORGANIZATIONS BESIDES OUR OWN
TO SEE IF WE CAN'T REVERSE
THIS DECISION.

UNFORTUNATELY THIS IS NOT A
UNIQUE ISSUE IN TERMS OF
ACCESS.

WE'RE SEEING OTHER SOCIAL
SECURITY FIELD OFFICES IN THE
SEATTLE REGION BEING MOVED TO
SPACES THAT ARE LESS
CONVENIENT AND ACCESSIBLE FOR
THE PUBLIC.

>> MR. KOFAHL, EXCUSE ME.
YOU HAVE ABOUT 45 SECONDS
LEFT.

>> THANK YOU.

>> SURE.

>> TWO OF THOSE OFFICES THAT
HAVE COME TO OUR ATTENTION
RECENTLY ARE THE VANCOUVER,
WASHINGTON OFFICE, THE MANAGER
ACTUALLY WAS REPORTED TO HAVE
TOLD HIS EMPLOYEES IN A STAFF
MEETING THAT THAT FIELD OFFICE
WOULD BE MOVED TO A DIFFERENT
PART OF VANCOUVER, WASHINGTON
FOR THE EXPRESS PURPOSE OF
MAKING IT LESS ACCESSIBLE TO
WALK-IN VISITORS IN AN EFFORT,
APPARENTLY, TO CUT DOWN ON THE
NUMBER OF PEOPLE THEY ARE ABLE
TO RECEIVE SERVICES IN THAT
MANNER.

IN HOKANY, WASHINGTON I
RECENTLY VISITED AND FOUND
THAT THEY ARE MOVING FROM
QUALITY SPACE JUST A COUPLE OF
BLOCKS TO ANOTHER BUILDING
THAT WILL BE A POORER
FACILITY.

[BELL]

>> AND THERE WILL BE NO
PARKING AS OPPOSED TO HAVING
FREE PARKING.

>> MR. KOFAHL, I HATE TO CUT
YOU OFF.

I AM GOING TO HAVE TO ASK YOU
TO FINISH THIS LAST POINT.
PLEASE WRAP UP.
YOUR TIME IS UP.

>> SURE.

OKAY.

SO THE WHOLE ISSUE OF
ACCESSIBILITY IS A MAJOR
CONCERN OF OURS WITH SPACE
ACTIONS, AND WE THINK THIS
NEEDS TO BE LOOKED AT IN TERMS
OF HANDICAPPED ACCESSIBILITY
FOR MENTALLY AND PHYSICALLY
DISABLED.

THANK YOU.

>> MR. KOF AHL, ONE LAST THING,
IF YOU WEREN'T ABLE TO FINISH
ALL OF YOUR COMMENTS, YOU KNOW
THAT YOU HAVE THE OPPORTUNITY
TO FILE THOSE COMMENTS, SUBMIT
THEM AT WWW.REGULATIONS.GOV,
CORRECT?

>> YES, I KNOW THAT.

THANK YOU VERY MUCH.

>> I WOULD ENCOURAGE YOU TO DO
THAT.

THANK YOU.

>> THANK YOU.

>> OKAY.

WE'RE GOING TO TRANSITION TO
OUR NEXT COMMENTOR, WE HAVE A
MR. JEFF MICHAELSON ON THE
TELECONFERENCE LINE.

MR. MICHAELSON, PLEASE
IDENTIFY THE ORGANIZATION THAT
YOU REPRESENT AND PLEASE
REMEMBER THAT YOU HAVE FIVE
MINUTES.

YOUR TIME BEGINS NOW.

>> YES.

OKAY.

MY NAME IS JEFF MICHAELSON,
I'M THE BENEFITS ADVOCATE AT
THE WEST SIDE CENTER FOR
INDEPENDENT LIVING.
WE ASSIST INDIVIDUALS WITH
DISABILITIES, BOTH MENTAL AND
PHYSICAL, AND WE'RE DEDICATED
TO SHOWING INDIVIDUALS HOW TO
LIVE INDEPENDENTLY.
AND MY COMMENT AS IT PERTAINS
TO SECTION 504 OF THE

REHABILITATION ACT IS THAT OTHER FACILITIES, IN MY EXPERIENCE, HAVE ALWAYS BEEN ACCESSIBLE, WHEELCHAIR ACCESSIBLE AND WIDE ENOUGH AISLES AND SO FORTH.

I DO BELIEVE THAT THERE IS A PROBLEM AS IT RELATES TO INDIVIDUALS WITH MENTAL DISABILITIES IN THAT FROM A POLICY PERSPECTIVE THE REPRESENTATIVES AT SOCIAL SECURITY DO NOT ALWAYS SEEM TO BE PREPARED AND ABLE AND TRAINED IN ORDER TO DEAL WITH INDIVIDUALS WITH MENTAL DISABILITIES, PARTICULARLY THOSE WHO MAY HAVE SOMEWHAT MORE AGITATED MENTAL DIAGNOSES, SUCH AS SCHIZOPHRENIA OR WHATNOT IN THAT IT IS DIFFICULT TO DEAL WITH THOSE INDIVIDUALS, AND THEY CAN BECOME ANGRY AND UPSET QUITE EASILY.

AS WELL AS THOSE WITH AUTISM OR MENTAL DEFICITS WHO ALSO HAVE A GREAT DEAL OF DIFFICULTY EXPRESSING THEMSELVES.

SO MY COMMENT, MY HOPE IS TO SEE THAT SOCIAL SECURITY ADMINISTRATION OFFICES IN CONJUNCTION WITH DISTRICT MANAGERS PERHAPS HAVE AN INDIVIDUAL WHO IS TRAINED VERY KNOWLEDGEABLE ABOUT MENTAL HEALTH ISSUES WHO COULD ASSIST THOSE PEOPLE WHO HAVE THOSE PROBLEMS WHEN THEY IDENTIFY THEMSELVES AS HAVING A MENTAL DISABILITY THAT THAT INDIVIDUAL WOULD DEAL WITH THEM AND WOULD TRY TO WORK WITH THEM IN A NON-PRESSURED, NON-CONFLICTUAL MANNER.

>> THANKS.

>> THANK YOU, MR. MICHAELSON. YOU HAVE APPROXIMATELY TWO MINUTES AND 30 SECONDS LEFT, IF YOU WOULD LIKE TO ADD ANY COMMENTS.

>> THAT'S MY GENERAL COMMENT.
IT WAS REALLY SPECIFIC TO THAT
ISSUE, AND I REALLY WOULD LIKE
TO SEE THAT DEVELOPED, THAT
THERE WAS MORE CONCERN GIVEN
TO THOSE WITH MENTAL
DISABILITIES, THAT THERE'S A
SPECIFICALLY TRAINED
INDIVIDUAL, PERHAPS A CLINICAL
PSYCHOLOGIST ON STAFF, OR
PERHAPS A SOCIAL WORKER WHO IS
REALLY THE KEY POINT PERSON ON
THAT TOPIC WHO WOULD BE
FAMILIAR WITH DSM DIAGNOSES
AND ALSO TREATMENT ISSUES, AND
WOULD BE ABLE TO COUNSEL THOSE
PEOPLE TO RELIEVE THE STRESS
AND PRESSURE THAT THEY FEEL.
A TYPICAL REPRESENTATIVE DOES
NOT HAVE AT THAT TRAINING AND
DOES GET QUITE UPSET WHEN THE
INDIVIDUAL IS UNABLE TO
ARTICULATE THEMSELVES.
SO THAT'S MY HOPE, AND PERHAPS
IT WILL EFFECTUATED BY THE
ADMINISTRATION, AND I
APPRECIATE THE EFFORT THAT'S
GOING INTO THIS PROCESS TO
ALLOW SOCIAL SECURITY
ADMINISTRATION TO BE MORE FULL
SHALL -- TO MORE FULLY EMBRACE
THE DISABLED AND SERVE THEIR
NEEDS.

>> THANK YOU, MR. MICHAELSON
FOR YOUR COMMENTS.
HAVE A GREAT AFTERNOON.

>> OKAY, GREAT.

>> OKAY.

WE'RE GOING TO MOVE FORWARD.
WE'RE GOING TO PUSH THROUGH,
FOLKS.

LET'S MOVE ON TO OUR NEXT
TELECONFERENCE COMMENTER.

I HAVE A MISS ALEXANDRIA
DOOLITTLE ON THE LINE.

IF YOU WOULD PLEASE IDENTIFY
THE ORGANIZATION THAT YOU
REPRESENT, AND PLEASE REMEMBER
THAT YOU HAVE FIVE MINUTES.
YOU MAY BEGIN.

>> OKAY, THANK YOU FOR THE
OPPORTUNITY TO COMMENT.

MY NAME IS ALEXANDRIA DOOLITTLE, I'M THE EXECUTIVE DIRECTOR AT THE SEATTLE COMMUNITY LAW CENTER IN SEATTLE, WASHINGTON. MY COMMENTS TODAY ARE TAILORED SPECIFICALLY TO THE SOCIAL SECURITY ADMINISTRATION'S COMPLIANCE WITH 504 AS IT RELATES TO THE RELOCATION AND CONSOLIDATION OF THE DOWNTOWN SEATTLE AND SOUTH SEATTLE SOCIAL SECURITY FIELD OFFICES. OUR COMMENT HAS TWO PARTS. THERE'S THESE TWO OFFICES ARE BOTH BEING CONSOLIDATED, AND MOVED TO A LEVEL FOUR SECURED BUILDING CALLED THE JACKSON STREET FEDERAL BUILDING. MY CONCERN WITH THE MOVE, FIRST, IS THAT MOVEMENT TO A LEVEL 4 SECURED BUILDING PRESENTS MANY BARRIERS FOR CLIENTS WITH PHYSICAL DISABILITIES AND MORE IMPORTANTLY, IT PRESENTS TO OUR CLIENT BASE BARRIERS TO CLAIMANTS THAT HAVE MENTAL HEALTH IMPAIRMENTS THAT PRESENT WITH ANXIETY AND PARANOIA WHO WILL FIND IT EXTREMELY DIFFICULT TO APPROACH THESE BUILDINGS, MUCH LESS GO THROUGH THE SECURITY THAT IS REQUIRED IN A LEVEL 4 SECURED BUILDING. THERE ARE OTHER OPTIONS IN THE SEATTLE AREA OF BUILDINGS, OTHER FEDERAL BUILDINGS THAT DON'T HAVE LEVEL 4 SECURITY IN THE BUILDING. SO AS FAR AS THE MOVE TO THAT PARTICULAR BUILDING, WE WOULD REQUEST THAT IN ORDER TO COMPLY WITH 504 MOVEMENT TO A DIFFERENT BUILDING BE CONSIDERED. SECONDLY, CONSOLIDATION OF THE TWO SEATTLE FIELD OFFICES IS NOT PROBLEMATIC IN OUR OPINION IF IT IS NOT CLOSELY FOLLOWED BY A REDUCTION IN STAFF AND A

DECREASE IN THE QUALITY OR TYPE OF IS PROVIDED AT THE SOCIAL SECURITY FIELD OFFICES: A REDUCTION IN STAFF AND A SHIFT TO INTERACTIONS THAT ARE NOT FACE-TO-FACE WILL BE AN INCREDIBLE BARRIER TO CLAIMANTS WITH DISABILITIES ACROSS THE BOARD.

OUR CLIENTS SPECIFICALLY AT THE SEATTLE COMMUNITY LAW OFFICE ARE CONCERNED THAT SOCIAL SECURITY FIELD OFFICE WORKERS ALREADY FACE SIGNIFICANT WORK LOADS AND STRUGGLES TO PROVIDE ADEQUATE SERVICE TO CUSTOMERS, FOR EXAMPLE, IN MARCH, 2009, TESTIMONY TO THE HOUSE COMMITTEE ON WAYS AND MEANS REVEALED THAT 12.8% OF PEOPLE WHO VISIT THE DOWNTOWN SEATTLE FIELD OFFICE ARE ALREADY TURNED AWAY WITHOUT BEING SERVED.

SO CONSOLIDATION, IF IT IS FOLLOWED BY A REDUCTION IN STAFF IS VERY CONCERNING FOR THE PEOPLE TO ACCESS THEIR BENEFITS AND INFORMATION ABOUT THEIR BENEFITS IN A MANNER THAT THEY CAN UNDERSTAND.

INTERNET SERVICES WORK FINE FOR PEOPLE WHO HAVE ACCESS TO INTERNET, BUT THE PERCENTAGE OF PEOPLE WHO ARE ON SOCIAL SECURITY BENEFITS THAT DO HAVE ACCESS TO INTERNET IS NOT AS GREAT AS SOME MAY THINK, ALTHOUGH FOLKS WITHOUT INTERNET ACCESS IN THE HOME CAN ACCESS THE INTERNET IN PUBLIC PLACES, SUCH AS THE PUBLIC LIBRARY OR WORKPLACE, THESE VENUES DON'T OFFER THE KIND OF SECURITY AND PRIVACY THAT ARE DESIRABLE WHEN USING E-SERVICES ON THE SOCIAL SECURITY'S WEBSITE.

IN OUR EXPERIENCE, DISABILITY BENEFIT RECIPIENTS ARE OFTEN RECEIVING BENEFITS BECAUSE

THEY LACK THE CAPACITY TO UNDERSTAND, CONCENTRATE AND OTHERWISE COMMUNICATE. THEREFORE THESE FACE-TO-FACE INTERACTIONS ARE EXTREMELY IMPORTANT AND THEY ALLOW FOR SOCIAL SECURITY TO COMPLY WITH 504.

>> MISS DOOLITTLE, EXCUSE ME OF THE YOU HAVE ABOUT 50 SECONDS -- YOU HAVE ABOUT 50 SECONDS LEFT.

>> THANK YOU.

>> YOU ARE WELL KOL.

>>

>> ENCOURAGING CUSTOMERS TO RELY ON SOCIAL SECURITY'S TELEPHONE SERVICES AS AN ALTERNATIVE TO VISITING FIELD OFFICES CAN BE CHALLENGING. WHILE 25% OF FIELD OFFICE MANAGERS REPORT THAT THEIR OFFICE AS BEING ABLE TO PROVIDE PROMPT TELEPHONE SERVICE, MORE THAN OF -- 60% OF THE TIME, PRACTICALLY ALL MANAGERS RECEIVE REGULAR COMPLAINTS ABOUT THE TELEPHONE SERVICE PROVIDED BY THEIR FIELD OFFICE.

IN CONCLUSION, IN ORDER TO MAINTAIN ACCESS TO BENEFITS AND MAINTAIN ACCESS TO INFORMATION ABOUT BENEFITS IN ACCORDANCE WITH 504, WE REQUEST THAT THE MOVE TO THE JACKSON STREET FEDERAL BUILDING BE RECONSIDERED AND RENEGOTIATED TO A DIFFERENT BUILDING.

THANK YOU.

>> THANK YOU, MISS DOOLITTLE. HAVE A WONDERFUL AFTERNOON.

>> BYE-BYE.

>> OKAY.

LET'S MOVE ON TO OUR NEXT CONFERENCE COMMENTER VIA TELEPHONE, A MISS NANCY McCABE.

MISS McCABE, PLEASE IDENTIFY THE ORGANIZATION THAT YOU REPRESENT AND PLEASE REMEMBER

THAT YOU HAVE FIVE MINUTES.
YOU MAY BEGIN.
>> MISS McCABE, ARE YOU THERE?
>> I THINK MISS McCABE IS NO
LONGER ON THE LINE.
>> OKAY.
>> STAND BY, WE'LL TRY TO GET
HER BACK.
>> VERY GOOD.
IF YOU FOLKS CAN BEAR WITH US
FOR JUST A FEW MINUTES AS WE
STAND BY.
DO WE HAVE ANOTHER PERSON ON
THE LINE WE CAN GO TO?
OKAY.
APOLOGIZE.
LET'S MOVE ON TO ... MISS
KYRA KIZANTIS.
DID I PRONOUNCE THAT
CORRECTLY?
KYRA KIZANTIS?
OKAY.
WE'RE GOING TO TAKE A SHORT
BREAK, SO PLEASE STAND BY, AS
WE TRY TO CONNECT WITH SOME OF
OUR FOLKS VIA TELL
CONFERENCE -- TELECONFERENCE.
THANK YOU.
>>> OKAY, WELCOME BACK.
THANK YOU, ALL, FOR YOUR
PATIENCE DURING THAT BRIEF
INTERMISSION.
LET'S GO BACK TO MISS NANCY
McCABE.
PLEASE IDENTIFY THE
ORGANIZATION YOU REPRESENT AND
PLEASE REMEMBER THAT YOU HAVE
FIVE MINUTES.
YOU MAY BEGIN.
>> HI, MY NAME IS NANCY
McCABE, I AM A PARENT OF A
SPECIAL NEEDS ADULT.
HE'S 20 YEARS OLD, AND I WOULD
LIKE TO TELL MY STORY AS TO
WHAT HAPPENED TO KYLE, WITH
THE SSA OFFICE IN DELL RAY
BEACH, FLORIDA.
I WAS CALLED IN FOR REVIEW,
KYLE HAS BEEN COLLECTING
SSI SINCE JANUARY OF -- MARCH
OF 2009, EXCUSE ME, AND I WAS
CALLED IN FOR A REVIEW, AND

WHEN THEY CHECKED THROUGH THE PAPERWORK, THEY FOUND AND DISCOVERED THAT HE HAD A TRUST, WHICH I HAD DECLARED FROM THE VERY BEGINNING. THEY SAID THAT IT WAS NOT A GOOD TRUST, THEY DID NOT AFFORD ME A FORMAL CONFERENCE. I WENT AHEAD AND MET WITH THEM THREE TIMES, AND THEY DECIDED THAT THEY STOPPED HIS BENEFITS, EVEN THOUGH I HAD GIVEN A REQUEST FOR A RECONSIDERATION. THEY SAID IT WAS DENIED, WITHOUT GIVING ME A FORMAL CONFERENCE, SO THEY HAVE STOPPED KYLE'S SSI PAYMENTS, AND THEY ARE ALSO ASKING FOR EVERYTHING BACK FOR THE LAST TWO YEARS, WHICH IS CLOSE TO \$60,000.

MY SON IS A SEVERELY HANDICAPPED PERSON, AND THIS HAS UPSET ME EXTREMELY AS FAR AS THE TREATMENT THAT WE RECEIVED FROM THE SSA OFFICE IN DELL RAY BEACH. AGAIN, AS I TOLD YOU, THEY -- WE REQUESTED A RECONSIDERATION, AND IT WAS DENIED, AND ALSO THEY DID NOT GIVE US TIME TO EVEN CORRECT THE SPECIAL NEEDS TRUST WITH MY ATTORNEY, AND THEY ELIMINATED HIS SSI BENEFITS PENDING APPEAL.

I HAVE AN APPEAL NOW BEFORE AN ADMINISTRATIVE LAW JUDGE AND NOW I MUST WAIT, WHICH I WAS TOLD A YEAR TO A YEAR AND A HALF BEFORE EVEN GETTING BEFORE AN ADMINISTRATIVE LAW JUDGE TO HEAR THIS ISSUE.

I JUST THINK IT'S A TERRIBLE INJUSTICE DONE TO A DISABLED PERSON WHO CAN'T EVEN TAKE CARE OF HIMSELF.

KYLE HAS A GJ FEEDING TUBE, HE HAS SEIZURES, HE'S NON-AMBULATORY, IN A WHEELCHAIR, HE IS IN NEED OF

TOTAL CARE, AND MY HUSBAND AND I TAKE CARE OF THIS CHILD AT HOME, AND HAVE BEEN FOR THE LAST 20 YEARS OF HIS LIFE, AND WE LOVE HIM DEARLY.

AND THIS IS JUST A TOTAL INJUSTICE WHAT HAS BEEN DONE TO THIS SPECIAL NEEDS ADULT.

>> M IS McCABE -- MISS McCABE, DO YOU HAVE SOMETHING SPECIFIC TO COMMENT WITH REELS TO SECTION -- RELATION SH TO SECTION 504 WITH THE SOCIAL SECURITY ADMINISTRATION ACCESSIBILITY TO AN SSA FIELD OFFICE, PERHAPS?

ANYTHING ALONG THOSE LINES?

>> ACCESSIBILITY, YOU'RE TALKING ABOUT GETTING INTO THE OFFICE ITSELF?

>> THAT COULD BE ONE OF THE ISSUES RAISED, SURE.

>> WELL, ONE THING I WAS TOLD BY ONE OF THE WORKERS THERE AT THE SSA OFFICE WAS WHEN I BROUGHT MY SON IN TO DISCUSS ALL OF THESE PROBLEMS, SHE TOLD ME THAT I DIDN'T NEED TO BRING HIM IN TO THAT OFFICE TO DISCUSS ANY OF THIS, EVEN THOUGH IT IS TOTALLY ALL CONCERNING HIM.

>> I UNDERSTAND.

WHILE I AM EMPATHETIC TO YOUR CONCERNS SHALL AND WE HAVE HEARD YOU TODAY, THIS PUBLIC FORUM IS SPECIFICALLY RESERVED FOR COMMENTS WITH REGARD TO SECTION 504 AND ACCESSIBILITY FOR FOLKS WITH DISABLING CONDITIONS.

>> OKAY.

>> SO, AGAIN, WE APPRECIATE YOUR TESTIMONY, WE APPRECIATE YOUR COMMENTS, BUT WE REALLY DON'T HAVE ANY COMMENTARY FOR YOU OR THE ABILITY TO RESPOND TO YOUR QUESTIONS ABOUT YOUR SPECIFIC CIRCUMSTANCE WITH YOUR SON.

>> WELL, I CERTAINLY HOPE THAT, YOU FOLK, BECAUSE YOU

HAVE -- YOU KNOW, BECAUSE YOU
HAVE THESE OTHER PEOPLE THERE
REPRESENTING THE SSA THAT
PEOPLE CAN HEAR WHAT IS HAS
HAPPENED TO THIS PERSON.

>> AND WE HAVE.

AND WE APPRECIATE YOU SHARING
THAT WITH US.

>> OKAY.

AND LIKE I SAID, I THINK, YOU
KNOW, JUST ME BEING TOLD WHEN
I BROUGHT HIM IN THERE NOT TO
EVEN BRING HIM IN THERE, THAT
I DIDN'T NEED TO DO THAT.

THIS WAS CONCERNING HIM.

SO THAT IS AN ACCESSIBILITY
ISSUE IN MY EYES.

>> I UNDERSTAND.

[BEEPING]

>> THANK YOU VERY MUCH.

>> THANK YOU FOR YOUR
COMMENTS, I APPRECIATE IT.

>> UM-HUM, THANK YOU.

>> OKAY.

LET'S MOVE ON TO OUR NEXT
TELECONFERENCE COMMENTER.

THAT IS A MISS KYRA KIZANTIS.

>> HI, IT'S KIYRA KIZANTIS.

>> PLEASE IDENTIFY THE
ORGANIZATION THAT YOU
REPRESENT AND PLEASE REMEMBER
THAT YOU HAVE FIVE MINUTES.
YOU MAY BEGIN.

>> THANK YOU.

MY NAME IS KYRA KIZANTIS, AS I
SAID, I AM THE DIRECTING
ATTORNEY AT PUBLIC INTEREST
LAW FIRM AT THE LAW FOUNDATION
OF SILICON VALLEY IN SAN JOSE,
CALIFORNIA.

I ALSO REPRESENT THE OTHER
PROGRAMS IN OUR ORGANIZATION,
MENTAL HEALTH ADVOCACY PROJECT
AND HEALTH LEGAL SERVICES, AND
WE HAVE PREVIOUSLY SUBMITTED
LETTERS CONCERNING WHAT WE
THOUGHT SOCIAL SECURITY SHOULD
LOOK AT IN TERMS OF ITS 504
EVALUATION AND PLAN ON
DECEMBER 3RD IN 2010, AND THEN
IN APRIL, 2009 WE ALSO
SUBMITTED A GROUP

ADMINISTRATIVE COMPLAINT ABOUT
THE FAILURE OF SOCIAL SECURITY
TO HAVE 504 POLICIES AND
VIOLATING 504.

AND I WON'T -- SO I WON'T
RE-READ THOSE LETTERS TO YOU,
AND THOSE ARE THERE,
HOPEFULLY, FOR YOU TO REVIEW
IN DETAIL, TO SEE WHAT OUR
COMMENTS HAVE BEEN OVER, YOU
KNOW, QUITE SOME TIME NOW.
WE'RE EXTREMELY EXCITED THAT
SOCIAL SECURITY IS CONDUCTING
A COMPREHENSIVE 504
EVALUATION, AND WE'RE MOST
CONCERNED, I THINK, ALSO AS
ONE CALLER HAD SAID WITH HOW
WE WOULD LIKE TO SEE SOCIAL
SECURITY PROVIDE

ACCOMMODATIONS FOR THOSE
BENEFICIARIES OR APPLICANTS
WITH COGNITIVE I AM PARENTS,
BECAUSE WE THINK -- I AM
IMPAIRMENT BECAUSE WE THINK
THIS IS AN AREA WHERE THE
SOCIAL SECURITY ADMINISTRATION
IS FALLING DOWN.
AS OUR LETTER INDICATES OR
STATES, THE KEY COMPONENTS OF
A 504 PLAN WOULD BE
COMPREHENSIVE AND ONGOING
TRAINING OF STAFF, CLEAR
WRITTEN 504 POLICIES, AS WELL
AS INCLUSION OF THOSE POLICIES
IN RELEVANT SECTIONS OF THE
PALMS AND OTHER POLICY
DIRECTIVES, ADEQUATE NOTICES
TO BENEFICIARIES OF RATES, AND
ACCESSIBILITY OF FACILITIES
AND MOST IMPORTANTLY, ITS
COMMUNICATIONS WITH
BENEFICIARIES.

JUST TO TELL YOU WHAT I MEAN
BY THAT, SPECIFICALLY, SOCIAL
SECURITY'S COMMUNICATIONS ARE
DIFFICULT EVEN FOR AN ATTORNEY
WITH 20 YEARS' EXPERIENCE LIKE
I HAVE DEALING WITH SOCIAL
SECURITY AND SOCIAL SECURITY
CLAIMANTS TO UNDERSTAND, NO
LESS SOMEONE WITH A SERIOUS
COGNITIVE IMPAIRMENT, TROUBLES

CONCENTRATING, TROUBLE
READING, TROUBLE REMEMBERING
AND TROUBLE KEEPING TOGETHER
DOCUMENTS.

THESE NOTICES ARE REALLY
IMPENETRABLE AND NEED TO BE
MODIFIED OR STAFF NEED TO BE
ABLE TO HELP CLAIMANTS AND
BENEFICIARIES UNDERSTAND THE
NOTICES WHEN THEY GET THEM,
AND THAT MEANS THAT ALSO THE
BENEFICIARIES NEED TO KNOW
THEY CAN GET HELP.

AND GOING BACK TO THE CLEAR
POLICIES, AN EFFECTIVE 504
POLICY WOULD INCLUDE PROPER
SCREENING FOR REASONABLE
ACCOMMODATION NEEDS BECAUSE
NOT EVERYBODY KNOWS WHAT
NEED -- WHAT MIGHT BE USEFUL
FOR THEM IN TERMS OF BEING
ABLE TO FOLLOW SOCIAL SECURITY
PROTOCOL AND RULES, AND SO
THEY MAY NEED HELP IN FIGURING
OUT WHAT KIND OF HELP THEY
NEED.

AND ALSO THERE HAS TO BE
ASSISTANCE FOR BENEFICIARIES
WITH ALL FACETS OF THE SOCIAL
SECURITY PROCESS.

SO AT ANY STAGE THAT THE
PERSON NEEDS HELP IN
RESPONDING TO A REQUEST AND
GATHERING DOCUMENTATION AND
UNDERSTANDING WHAT SOCIAL
SECURITY IS ASKING OF THE
PERSON, THEY SHOULD BE ABLE TO
HAVE THAT PROVIDED TO THEM BY
SOCIAL SECURITY STAFF.

I ALSO THINK A POLICY WOULD
INCLUDE INTERNAL MONITORING OF
THE 50 COMPLIANCE -- 504
COMPLIANCE, ADEQUATE REFERRALS
TO OUTSIDE MONITORS OR
ADVOCATES, WHO HAVE OPEN
ACCESS TO PEOPLE AT SOCIAL
SECURITY TO WHOM THEY CAN
COMPLAIN AND GET ASSISTANCE.
YOU KNOW, MENTAL HEALTH
ADVOCACY PROJECT, WHICH OUR
ORGANIZATION SERVES 4 TO 6,000
CLIENTS A YEAR, AND ABOUT, I

WOULD SAY, 30% OF THOSE WITH SOCIAL SECURITY APPEALS, WE HAVE A VERY GOOD RELATIONSHIP WITH OUR LOCAL SOCIAL SECURITY OFFICE, WE HAVE WHAT WE CALL A BACK DOOR NUMBER THAT WE CAN CALL TO SAY THIS PERSON NEEDS A LOT OF HELP, AND BECAUSE OF THAT, AND BECAUSE THERE'S OUR OFFICE IN SAN JOSE, YOU KNOW, THERE AREN'T AS MANY PEOPLE FALLING THROUGH THE CRACKS. THEY ARE GETTING HELP.

THEY ARE -- THEY HAVE OUR ADVOCACY AND WE CAN SAVE THEM LOTS OF TIMES FROM FAILING TO RESPOND, FROM MISSING THEIR DEADLINES, FROM NOT BEING ABLE TO -- FROM BEING, YOU KNOW, TOO PARANOID TO GO INTO THE SOCIAL SECURITY OFFICE, OR THEY JUST DON'T UNDERSTAND WHAT'S HAPPENING TO THEM.

>> MISS KAZANTZIS, YOU HAVE 30 SECONDS REMAINING.

>> GOT YOU.

THERE'S LOTS OF PLACES IN THE COUNTRY THAT DON'T HAVE THAT KIND OF HELP, AND THEY DON'T HAVE THAT KIND OF ACCESS.

I WILL BE SENDING YOU FOLLOW-UP COMMENTS IN WRITING, SO -- AND WHAT I WILL BE SENDING IS, OUR I.D. IS ABOUT BEST PRACTICES, NOT WHAT IS THE MINIMUM LEGAL REQUIREMENT FOR REASONABLE ACCOMMODATION, BUT WHAT WILL REALLY HELP PEOPLE AND WHAT OUR BEST PRACTICES THAT WE'VE CULLED FROM OTHER PLACES IN THE COUNTRY AND ACTUALLY IN IT THE WORLD.

[BEEPING]

>> IS THAT MY BEEP?

>> THAT'S YOUR BEEP.

>> THANKS.

>> MISS KAZANTZIS, I WOULD ENCOURAGE YOU TO REGISTER FOR THE NEXT SECTION 504 PUBLIC FORUM, SELF-EVALUATION PUBLIC FORUM ON SEPTEMBER 20TH.

THAT IS DEALING SPECIFICALLY
WITH COMMUNICATIONS AND
TECHNOLOGY WITH THE SOCIAL
SECURITY ADMINISTRATION.

>> I CERTAINLY WILL.

>> ONE OF THE ISSUES YOU
RAISED SOUND LIKE THEY CAN BE
ADDRESSED THERE.

WE'LL HAVE DIFFERENT PANEL
MEMBERS THERE WHO WILL BE
EXPERTS, IF YOU WILL, IN THOSE
PARTICULAR AREAS.

>> WONDERFUL.

THANK YOU.

>> THANK YOU SO MUCH FOR YOUR
COMMENTS.

I REALLY DO APPRECIATE IT.

>> 'BYE.

>> OKAY.

WITH THAT CALL, THAT BRINGS US
TO THE CONCLUSION OF OUR
SECTION 504 SELF-EVALUATION
PUBLIC FORUM ON POLICY AND
FACILITIES.

I WANT TO THANK EVERYONE WHO
IS IN ATTENDANCE TODAY HERE IN
PERSON.

I CERTAINLY WANT TO THANK ALL
OF THOSE FOLKS WHO CALLED IN
AND GAVE THEIR TIME TO MAKE
THEIR COMMENTS KNOWN PUBLICLY.
WE REALLY DO APPRECIATE THAT.
PLEASE KEEP IN MIND FOLKS CAN
REGISTER -- EXCUSE ME, FOLKS
CAN LEAVE THEIR COMMENTS FOR
UP TO 990 DAYS, THAT -- 9 THE
0 DAYS, THAT TAKES US TO
NOVEMBER 15TH AT
WWW.REGULATIONS.GOV, AGAIN,
THAT'S WWW.REGULATIONS.GOV,
THE DOCKET I.D. NUMBER TO
LEAVE THOSE COMMENTS WITH
REGARD TO TODAY'S PUBLIC FORUM
IS SSA-2011-0035.

AGAIN THAT'S DOCKET I.D.

SSA-2011-0035.

AGAIN, I WANT TO THANK
EVERYONE IN ATTENDANCE, AND
PLEASE REMEMBER TO VISIT
SOCIAL SECURITY.GOV,
WWW.SOCIALSECURITY.GOV TO
LEARN MORE ABOUT SOCIAL

SECURITY'S COMMITMENT TO
SECTION 504.
THANK YOU VERY MUCH FOR YOUR
TIME.