Foundations for Evidence-Based Policymaking Act of 2018 Fiscal Years 2022–2026 Learning Agenda





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Selected Abbreviations

ASP	Agency Strategic Plan
DI	Disability Insurance
FY	Fiscal Year
OASI	Old-Age and Survivors Insurance
OMB	Office of Management and Budget
SSA	Social Security Administration
SSAB	Social Security Advisory Board
SSI	Supplemental Security Income

INTRODUCTION

This *Fiscal Years (FY) 2022–2026 Learning Agenda* describes our evidence-building roadmap to support the goals in our *FYs 2022–2026 Agency Strategic Plan (ASP)*. We identified ten priority questions that correspond to the ASP goals. The priority questions include short-term and long-term questions related to our mission, strategic plans, and agency operations. We expect that answers to our priority questions will provide valuable information about our agency's performance and promote evidence-based decision-making.

We gathered information from internal and external stakeholders to develop our *Learning Agenda*. In January 2021, our Evaluation Officer held an initial meeting with internal stakeholders from all our major offices. At the meeting, our Evaluation Officer provided a description of the *Learning Agenda*, a description of possible *Learning Agenda* questions, and a sample of information we would include with a priority question in the *Learning Agenda*. Our Evaluation Officer established a working group with two representatives from each of our 11 major offices to obtain their input as internal stakeholders and to identify priority questions.

The working group sought input from external stakeholders that included members of the public, agencies, State and local governments, and representatives of non-governmental research organizations. To solicit input specifically for our *Learning Agenda*, on April 20, 2021, we published in the *Federal Register:* Request for Information on the Foundations for Evidence-Based Policymaking Act of 2018 Learning Agenda. To encourage comments on the *Request for Information* (RFI), we worked with our Office of Communications to send a "Dear Colleague" letter to 3,000 external stakeholders and we publicized the RFI on our What's New web page that reaches 59,000 subscribers. We considered all comments including those that recommended research or improvements to our programs in several areas:

- Understandability of our communications;
- Data sharing and collaboration with other agencies;
- Collecting race and ethnicity data;
- Timely and equitable service delivery:
- Work incentives; and
- The Ticket to Work program.

We regularly receive information on potential research and evaluation activities during routine communications with advocacy groups, our State and Federal agency partners, and the Social Security Advisory Board (SSAB). For example, our Associate Commissioner for the Office of Research, Evaluation, and Statistics sends an annual request for research topics to the SSAB. We considered their response to the request as we developed our *Learning Agenda*. We also obtained information from the SSAB's Roundtable on Social Security's Public Service that included a discussion of underserved populations and relevant research questions that we considered for inclusion in our *Learning Agenda*. The working group used this information as part of the process of developing and refining priority questions. Stakeholders expressed interest in further research and improvements to our programs to address the decline in disability applications during the COVID-19 pandemic or due to other long-term trends, race and ethnicity data, challenges related to providing in-person services needed by certain populations, improving service delivery for people facing barriers, and improving our communication and outreach.

The working group compiled a list of potential priority questions based on the information gathered from internal and external stakeholders and completed a process of refining and prioritizing the questions. In developing the final list, the working group focused on identifying a mix of short-term and longer-term priority questions that would inform goals in the *FYs* 2022–2026 *ASP*. After consulting with agency executives, we arrived at the ten priority questions identified in this *Learning Agenda*.

For each priority question, we provide background information and the actions we will take to answer the question. Specifically, we include:

- A project title;
- The corresponding agency strategic goal and objective;
- A description of the rationale and activities for the priority question;
- The timeframe for addressing the priority question;
- The potential data, tools, methods, and analytical approaches;
- The anticipated challenges to addressing the priority question; and
- The proposed solutions to those challenges.

LIST OF PRIORITY QUESTIONS

		rage
1	What are the effects of changes to our service delivery methods on the accessibility, use, efficiency, security, and equitable delivery of our services?	<u>6</u>
2	To what extent are the Disability Insurance (DI) and Supplemental Security Income (SSI) programs equitably serving and meeting the needs, including return-to-work efforts, of the population that Congress intended these programs to serve?	<u>9</u>
3	What are the key factors that influence the public's use of our online services, including the services we deliver through my Social Security, and what are the effects of methods to modify these key factors on our customers' decisions to create my Social Security accounts and use our online services?	<u>12</u>
4	What are the effects of changes to our communication methods on customer satisfaction, program integrity, and administrative efficiency?	<u>14</u>
5	Does redesigning the <i>Social Security Statement</i> and providing supplemental fact sheets with customized information on Social Security's programs improve people's knowledge of the programs and increase the use of internet services?	<u>16</u>
6	Does the working-age population have accurate knowledge of the Social Security disability programs, and to what extent does the working-age population's knowledge, attitudes, and perceptions of the Social Security disability programs influence the decision to pursue benefits?	<u>18</u>
7	To what extent are there systemic barriers to hiring, developing, and advancing a diverse and talented workforce and what are the effects of our Action Plan to mitigate those barriers in support of our goal to build an inclusive, engaged, and empowered workforce?	<u>19</u>
8	What factors contribute to Federal court remands of disability decisions, and what are the effects of modifying relevant factors on the percentage of final decisions that are affirmed upon judicial review?	<u>22</u>
9	What are the effects of simplifying administrative rules and requirements on reducing the burden on program participants and supporting program integrity?	<u>23</u>
10	What are the effects of improving collaboration and enhancing data sharing with external agencies on saving citizens time from reporting required information, reducing labor market barriers, improving program solvency projections, improving program administration, and reducing improper payments?	<u>25</u>
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SUPPORTING INFORMATION ON PRIORITY QUESTIONS

1 PRIORITY QUESTION

What are the effects of changes to our service delivery methods on the accessibility, use, efficiency, security, and equitable delivery of our services?

Project Title: Supporting Effective and Equitable Delivery of Social Security Services

FYs 2022–2026 ASP Goal & Objective: Optimize the Experience of SSA Customers > Identify and Address Barriers to Accessing Services

Description: Our customers traditionally had several options for conducting business with us including the use of in-person and telephone service at our field offices, telephone service using our National 800 number, online services including *my* Social Security, and video service delivery. This priority question will examine the effects of changes to our service delivery methods. It will also support evidence-building activities relevant to our *Equity Action Plan*, and *Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*.

Prior research shows that the field office closures that occurred between 2000 and 2014 resulted in fewer disability applications and fewer people receiving benefits, and disproportionately affected those individuals with lower education levels and lower pre-disability earnings (Deshpande and Li, 2019). Specifically, field office closings reduced "the number of disability applications by 10 percent and the number of recipients by 16 percent in neighborhoods whose nearest office closes, and have smaller but sizable effects in neighborhoods around neighboring offices." (Deshpande and Li, 2019, p. 245–246). The decline in applications was twice as large for the SSI program (14 percent for adults and 15 percent for children) as it was for the DI program (7 percent). Two of the conclusions that the authors draw from their study are: (1) the services provided by field offices were instrumental for 10 percent of applicants in the decision to apply, and in the past, legal representatives have not filled the gaps created by office closings; and (2) future decisions about field office placement should consider the distributional consequences of closings. It is important to note that this study estimates the effect of closing a subset of offices while other offices remain open and does not speak directly to the effect of closing all field offices at once.

The public health measures taken due to the COVID-19 pandemic limited the in-person services delivered in our field offices. The data show that applications for DI benefits, SSI aged payments, and SSI disability payments abruptly fell beginning in March 2020. As of December 2021, applications for DI benefits and SSI disability payments have not returned to their pre-pandemic levels. Building on prior research on the effects of field office closings, we will examine the distributional consequences of the limited in-person services delivered in our field offices by geographic location, race and ethnicity, demographic, and socioeconomic characteristics. Our findings will provide evidence on the characteristics of people who face barriers in accessing our services and will inform our efforts to deliver more effective and equitable services.

Our *Equity Action Plan* identifies our efforts to assist people who face challenges accessing and using our services. For example, we have taken actions such as providing outreach and support for filing applications. We established new liaison positions in our field offices to ensure that we provide quality and compassionate service to people experiencing physical or language barriers, medical conditions, or

inadequate access to the internet. Our liaisons also communicate with partners, as discussed below, on a regular basis to provide support and guidance on SSI claims. We will evaluate such efforts to estimate the effect on the use, efficiency, security, and equitable delivery of our services. We will use the results of our evaluation to determine whether we need to use other methods.

In the past, we worked with outside organizations through the Substance Abuse and Mental Health Services Administration (SAMSA)-funded SSI/DI Outreach, Access, and Recovery (SOAR) program to assist people who are homeless. It might be possible to adapt the SOAR model to assist other populations who experience barriers to applying for disability benefits. We will assess whether we can successfully adapt other evidence-based programs that help people access needed services and seek opportunities to form partnerships with other agencies that will enable people to obtain needed benefits. We may initially develop pilot projects designed to assess the efficacy of such programs for our purposes before proceeding to a larger scale project that would assess the effects on the use, efficiency, security, and equitable delivery of services.

The five agency-specific commitments in Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government will help us assess new service delivery options to improve access to our services. This includes an assessment of services requiring physical documentation or in-person appearance; developing a mobile-accessible, online process for document uploads; maintaining a public policy of technology neutrality in electronic signatures, consistent with applicable law and to the extent practicable; eliminating physical signature requirements, consistent with applicable law and to the extent practicable; and supporting customers to help identify other benefits for which they may be eligible and integrating agency data and processes with other Federal and State entitles whenever possible. As we develop and work toward these commitments, we will assess the new service delivery methods and identify enhancements that may improve the customer experience. We will establish customer research studies and obtain customer feedback as part of the Executive Order implementation. Although the details are not formalized at this point, we will continue to mature the Executive Order roadmaps and deployment plans. In addition, we have explored the use of a video-conferencing platform using the Microsoft Teams application to complete Social Security number replacement card transactions and to participate in hearings before an administrative law judge. We will continue to assess the use of video-conferencing platforms and use the results of our assessments to identify potential improvements. We will conduct foundational fact-finding research to identify other innovative methods for delivering our services.

Timeframe: FYs 2022–2026

Potential Data, Tools, Methods, and Analytical Approaches: We will use Social Security Administration (SSA) program data to produce descriptive statistics on the characteristics of applicants and recipients for each of the following programs: (1) Old-Age and Survivors Insurance (OASI) benefits, (2) DI benefits, (3) SSI payments based on disability, and (4) SSI payments based on age. The characteristics will include geographic location, limited English proficiency, pre-application earnings, and other available socioeconomic and demographic characteristics. We will produce descriptive statistics for three discrete periods: (1) pre-COVID-19 pandemic, (2) during the COVID-19 pandemic when in-person services were limited, and (3) when we increase our in-person services to the public. If available, we will expand this analysis using additional data on race and ethnicity, education level, household income, and other relevant data that is available in the American Community Survey (ACS) that is linked to our program data. This data analysis will provide an initial picture of whether certain sub-populations (e.g., low-income households) experienced larger than average declines in applications and benefit receipt when we limited in-person services. We will use appropriate multivariate statistical models to further assess the consequences of changes to our in-person services. This information will help us identify the characteristics of people facing barriers to our service delivery

methods. The information is foundational for developing effective and efficient outreach efforts, and for identifying communities where additional assistance is needed when our in-person services are limited.

We will use SSA program data to assess the effect of our outreach efforts during the COVID-19 pandemic period on applications for benefits, receipt of benefits, the time to a final decision on an application (efficiency), fraudulent claims (security), and characteristics of those we serve through our outreach (equity). Our assessment will rely on non-experimental methods (e.g., interrupted time series) to estimate the effects of our outreach on these outcomes. We plan to use focus groups, analysis of our customer experience data, and qualitative studies to supplement our assessment and provide additional context on the effects of our outreach.

We will seek research proposals from the Retirement and Disability Research Consortium (RDRC) centers via the "Improving Service Delivery" focal area to evaluate changes in our service delivery methods on key outcomes, including those identified in our priority question. We currently fund the RDRC centers at Boston College, the National Bureau of Economic Research, the University of Michigan, and the University of Wisconsin at Madison. The RDRC centers have expertise using a wide array of data sources, tools, methods, and analytical approaches to conduct their research. The research by Deshpande and Li (2019) is a good example of research funded through the RDRC.

For assessments and evaluations of new service delivery methods, we will develop an evaluation plan prior to implementation that describes the data, tools, methods, and analytical approaches. We will establish an enterprise Voice of the Customer feedback collection tool that will allow us to capture real-time customer feedback across all service channels to identify pain points along customer journeys. This will enable us to quantify baseline satisfaction with our various service delivery methods. We will analyze customer feedback to identify barriers to using our online services and determine ways to improve or expand our online services and increase customers' willingness to conduct business with us online. Our Evaluation Officer will review and approve the plans before implementation of the new program.

Anticipated Challenges: We have recently completed the agreement with the Census Bureau to link our program data to the ACS data for statistical purposes, and we will need to obtain approval from the Census Bureau to use the data for this project. The ACS data is a sample and the microdata for 2020 might not be useable due to issues with data collection during the pandemic.

Proposed Solutions: We will continue to work with the Census Bureau to obtain needed approval to use the data for this project. We will use the ACS to the extent possible for the analysis, and compute appropriate standard errors to account for sampling error. We will clearly describe the limitation with the ACS data in 2020 and the methods we used to address the limitation. We will identify our resource needs and make a concerted effort to obtain the necessary resources to conduct evaluations of new service delivery models. We will consult internal stakeholders before we assess service delivery methods to ensure that we are complying with legal requirements.

REFERENCE

Deshpande, Manasi, and Yue Li. 2019. "Who Is Screened Out? Application Costs and the Targeting of Disability Programs," American Economic Journal: Economic Policy 11(4):213–48.

2 PRIORITY QUESTION

To what extent are the Disability Insurance (DI) and Supplemental Security Income (SSI) programs equitably serving and meeting the needs, including return-to-work efforts, of the population that Congress intended these programs to serve?

Project Title: Assessment of the Disability Programs

FYs 2022–2026 ASP Goal & Objective: Optimize the Experience of SSA Customers > Identify and Address Barriers to Accessing Services

Description: The DI program provides income support, as well as Medicare coverage after a 24-month waiting period in most cases, to insured people who meet the definition of disability specified in the Social Security Act. The SSI program is a means-tested program that provides income assistance and access to Medicaid to adults and children who meet the definition of disability specified in the Social Security Act, and to those ages 65 or older. The DI and SSI programs provide access to employment supports through the Ticket to Work program, and employment and benefits counseling services through work incentive planning and assistance grants. The programs include provisions designed to encourage work among program participants.

While national in scope, there are distinct regional differences in participation in DI and SSI, as well as differences in participation by race, ethnicity, sex, age, and socioeconomic background. There might be differences in how claims are adjudicated and how people exit from the program (due to both work and medical improvement) that are associated with race, ethnicity, sex, age, and socioeconomic background. In support of our *Equity Action Plan* and Strategic *Objective 1.1—Identify and Address Barriers to Accessing Services*, this priority question will address the extent to which these differences may be due to the design and administration of the programs and the extent to which they may be due to external factors. External factors may include systemic barriers in the labor market, access to assistance with the application process, or other local conditions. The question will address whether the existing work incentives and services for people with disabilities provide the necessary support for achieving work goals including post-program employment outcomes.

Finally, this question will address the extent to which the disability programs are meeting the needs of beneficiaries. Studies have found that the DI and SSI programs substantially reduce poverty among beneficiaries; however, many continue to have unmet healthcare needs and disability-related expenses, and face barriers to achieving economic mobility. Understanding whether there are differences in how the programs meet their fundamental purposes by demographic and socioeconomic characteristics, and whether changes are necessary, will help ensure that we administer the programs equitably and that any changes we make to the programs are effective and efficient in achieving intended outcomes. Additionally, as part of our commitment to Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government, we will ensure cross-program benefit eligibility by maximally supporting applicants and beneficiaries to identify other benefits for which they may be eligible and integrate agency data and processes with other Federal and State entities whenever possible. This effort will help remove structural barriers to other benefits while we address the extent to which the DI and SSI programs are meeting the needs of the public.

Timeframe: FYs 2022-2025

Potential Data, Tools, Methods, and Analytical Approaches: We will conduct foundational fact-finding and interventional research to determine the needs of beneficiaries and whether the DI and SSI programs are meeting those needs.

The new *Disability Research Surveys* project will include a detailed survey of new applicants so that we can learn about how the applicants decided to apply for DI and SSI, their use of representation during the application process, and early experiences with the programs. As noted in our *Equity Action Plan*, this foundational fact-finding research will collect race and ethnicity information for program applicants and beneficiaries that will help us assess disparities in the application process and the programs, and will identify potential changes that might be necessary to more effectively serve applicants and beneficiaries.

The new Interventional Cooperative Agreement Program (ICAP) allows us to work with interested third parties to test new strategies for supporting people with disabilities. The ICAP announcement identified the following areas of inquiry:

- Examining the structural barriers in the labor market, including for racial, ethnic, or other underserved communities, including people with disabilities, that increase the likelihood of people receiving or applying for DI or SSI benefits;
- Promoting self-sufficiency by helping people enter, stay in, or return to the labor force, including transition-age youth;
- Coordinating planning between private and public human services agencies to improve the administration and effectiveness of the DI, SSI, and related programs;
- Assisting claimants in underserved communities apply for or appeal determinations or decisions on claims for DI and SSI benefits; and
- Conducting outreach to children with disabilities who are potentially eligible to receive SSI and conducting outreach to their parents and guardians.

In FY 2021, we made two awards. One project will conduct a randomized controlled trial to test an employment intervention for rehabilitation patients who experienced a recent neurotrauma, while the other project will conduct a feasibility study of implementing the SSI/SSDI Outreach, Access, and Recovery (SOAR) model with incarcerated people with serious mental illness. We plan to solicit new proposals on a recurring basis. Grant awardees will recommend specific data and methods that we will use for the specific project. We will work with the grantees to ensure that the research and evaluations are consistent with our evaluation policy (see www.ssa.gov/data). The ICAP is an important component of two focal areas within our *Equity Action Plan*.

We will conduct demonstrations to determine if potential interventions help reduce barriers to the employment programs or to the labor market. The Retaining Talent After Injury/Illness Network (RETAIN) project and Promoting Work through Early Interventions Project (PWEIP) will help determine if pre-disability program supports can improve worker connection to the labor force. A secondary objective of the PWEIP study is to compile data about evidence-based supported employment models and build our knowledge stock of effective interventions for people at risk for but not enrolled in DI or SSI. These projects will use survey data, SSA program data, focus groups, and qualitative methods to conduct both formative and summative evaluations. We are currently testing whether directly referring beneficiaries and applicants to vocational rehabilitation services will improve access to employment services in the Ohio Direct Referral Demonstration. We use program data and a randomized controlled trial design to evaluate the impact of this project on employment outcomes and program participation. Finally, we will begin a new evaluation of the Ticket to Work program to determine what barriers may exist in using our return-to-work activities and whether the Ticket to Work program meets the needs of beneficiaries interested in returning to work. The evaluations will use SSA program data, survey data,

and appropriate methods to assess the effects of the Ticket to Work program on use of employment services, employment, and SSI and DI program participation.

We are also working with researchers at the University of Chicago and the National Bureau of Economic Research to evaluate the effects of providing early information to families of child SSI recipients about the transition to adulthood on short-term and long-term outcomes. This project includes using SSA program data and a randomized control trial design to evaluate the impact of sending parents information about the likelihood that their child will lose SSI benefits at age 18 on parent beliefs and goals, the child's education investment and educational attainment, and ultimately employment and program participation outcomes. Combined with previous randomized control trial studies related to youth receiving SSI (e.g., the Youth Transition Demonstration and Promoting Readiness of Minors in SSI project), we expect to have a solid evidence base upon which to determine if changes to youth transition policies are necessary.

The Beyond Benefits Study will focus on the needs of people who have recently exited or whom we expect to exit the DI and SSI programs due to medical improvement. In addition to surveys, the Beyond Benefits Study will include focus groups and pilot a version of motivational interviewing to provide additional information on the needs and experiences of beneficiaries. The motivational interviewing pilot will also provide us with key information about the effectiveness of this as a time-limited intervention. The pilot will highlight the processes that are needed if we decide to conduct a future demonstration.

Each of these efforts will enable us to conduct distributional analyses and other evaluation activities to determine if the DI and SSI programs affect subgroups differently and if those subgroups have different needs from the programs. From these analyses, we will develop recommendations to improve the equitable and efficient administration of the DI and SSI programs, which aligns with a focal area described in our *Equity Action Plan*.

Anticipated Challenges: Each new data collection activity will require Paperwork Reduction Act clearance from OMB, as well as legal and privacy compliance actions. Additionally, new projects may require contracts or other similar agreements that take time to develop. There may be data limitations on what we can use for research purposes or what the agency collects that will limit what analyses we can do. Finally, our authority to initiate projects under section 234 of the Social Security Act terminated on December 31, 2021, which limits our ability to test DI program changes using the authority in section 234 unless Congress extends those dates.

Proposed Solutions: We have planned sufficient time to receive Paperwork Reduction Act clearance, address legal and privacy compliance actions, and enter into necessary agreements based on experiences with similar projects. We will continue to explore options for renewing our DI demonstration authority, in addition to using a variety of evidence-building methods, as mentioned above.

3 PRIORITY QUESTION

What are the key factors that influence the public's use of our online services, including the services we deliver through my Social Security, and what are the effects of methods to modify these key factors on our customers' decisions to create my Social Security accounts and use our online services?

Project Title: Assessment of the Public's Preferences and Needs for Online Services

FYs 2022–2026 ASP Goal & Objective: Optimize the Experience of SSA Customers > Expand Digital Services

Description: We offer a variety of secure online services to the public, including services within *my* Social Security that provide personalized tools for everyone, whether the person receives benefits or not. Through *my* Social Security, people in most States and the District of Columbia can request a replacement Social Security card, check the status of an application, estimate future benefits, and manage benefits. As of January 2022, more than 65 million people have a *my* Social Security account. The purpose of this priority question is to develop evidence that will help us increase our customers' willingness and ability to create a *my* Social Security account and use our online services. It will also support evidence-building activities relevant to our *Equity Action Plan*, and *Executive Order* 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government.

We have ongoing evidence-building activities underway on this priority question. We obtain information on the public's service delivery preferences and needs through a biannual prospective client survey, the University of Southern California's Understanding America Study, and other data collected such as customer satisfaction surveys. We will establish an enterprise Voice of the Customer feedback collection that will allow us to capture real-time customer feedback across all service channels to identify pain points along customer journeys. This will enable us to quantify baseline satisfaction with our online services. We will analyze customer feedback to identify barriers to using our online services and determine ways to improve or expand our online services and increase customers' willingness to conduct business with us online.

We collect data through focus group interviews and extensive user testing to assess changes to our online services before implementation. The insights we obtain through these efforts help us design user-friendly online services that are easy for the public to navigate. After we implement changes to online services, we will use real-time customer feedback collection to gauge the solutions' effectiveness. Our customer feedback management platform will provide data that can help us identify the page people were on when they provided their feedback, which will pinpoint where on the site customers were having issues. These activities will be important as we develop and implement new digital services, such as our support of Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government that includes the development of a mobile-accessible, online process so that any individual applying for or receiving services from us can upload forms, documentation, evidence, or correspondence associated with their transaction without the need for service-specific tools or traveling to a field office.

In some instances, our policy, regulations, authentication methods, and data limitations might impose barriers that prevent some people from using our online services. We have addressed some of these potential barriers in the past and we will assess how these changes may have influenced the use of our

online services. For example, customers now have the option to sign into *my* Social Security using their credentials (username, password, and second factor) from one of our external identity partners or sign in using their electronic access (eAccess) credentials (username, password, and second factor). This partnership allows customers to reuse existing credentials, which saves them time and effort because they do not have to go through the *my* Social Security registration process. This priority question will include an analysis of both the potential barriers to using our online services and the potential solutions to the barriers. The results of our analyses and assessments will inform our efforts to prioritize changes that will facilitate the use of our online services.

Timeframe: FYs 2022-2026

Potential Data, Tools, Methods, and Analytical Approaches: To respond to this priority question, we will use data from our biannual prospective client survey, the University of Southern California's *Understanding America Study*, and data collected from customers using other sources such as customer satisfaction surveys to continue tracking changes to the preferences and demands for our online services over time. We will use standard univariate and multivariate statistical methods, and we will use variation in survey responses over time and by demographic groups (e.g., age), to draw inferences on changes in our customers' preferences and demands for online services. We will use this information to help us identify potential changes to our online services. We will use focus groups and user testing to identify how to implement some of these changes.

We have included a new "Improving Service Delivery" focal area for our Retirement and Disability Research Consortium (RDRC) grant program. We will leverage their expertise to explore ways we may better identify and evaluate potential methods to improve access to, and use of, our online services. For example, some of the RDRC researchers specialize in behavioral economics, and they might identify new and innovative ways to guide the public toward establishing my Social Security accounts and conducting business with us online.

When we identify new online services to offer through *my* Social Security, we will assess potential barriers that our existing policies, regulations, authentication methods, and data limitations impose on users of some of the new services. We will conduct an analysis of methods that other Federal agencies and the private sector have used to overcome such barriers. This assessment will provide evidence to help us determine if we need to make changes aimed at increasing access to our online services.

Anticipated Challenges: The "Improving Service Delivery" focal area is new to the RDRC centers, and it might take RDRC researchers time to establish a research agenda on the new focal area. In addition, we must follow the confidentiality and privacy laws, as well as other legal requirements, when we collect customer feedback and perform user testing.

Proposed Solutions: In the past, we have collaborated with RDRC researchers to conduct studies on new priority areas. The collaboration has been successful in that it combines the program expertise from our research staff with the methods expertise from the RDRC research team. We might need to use this collaboration model to promote service delivery research among the RDRC researchers. We will consult internal stakeholders to ensure that we comply with legal requirements.

4 PRIORITY QUESTION

What are the effects of changes to our communication methods on customer satisfaction, program integrity, and administrative efficiency?

Project Title: Assessment of Customer Communications

FYs 2022–2026 ASP Goal & Objective: Optimize the Experience of SSA Customers > Build a Customer-Focused Organization

Description: We communicate with our customers and receive communications from them in different ways including U.S. mail, telephone, in-person, online (through the *my* Social Security Message Center), and other electronic forms such as text message and email. This priority question will assess the effectiveness of our communications and our customers' preferences for receiving communications. This assessment will provide us with information about changes that we expect to result in clearer and more effective communication that satisfies customer needs and preferences, increases program integrity, and helps us administer our programs more efficiently and effectively. The evidence-building activities will inform *Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government.*

We will initially focus our evidence-building activities on the following two sets of questions.

- 1. To what extent would customers applying for disability benefits prefer agency communication (e.g., requests for forms completion, reminders to return forms or attend a consultative examination) by email, text, my Social Security Message Center, or U.S. mail? Why do customers prefer a certain method, and does this preference vary by demographic group or socioeconomic status? If so, why? Do different communities face different barriers with some types of communication?
- 2. To what extent would customers prefer to complete and submit forms, necessary for the disability determination or redetermination process, electronically or through a paper submission? Why do customers prefer electronic or paper submission (e.g., convenience, security concerns related to personally identifiable information transmission, access to computers and technology, etc.)? Does this preference vary by demographic group or socioeconomic status? Would customers prefer using a secure portal (like my Social Security) to complete and submit forms and other required information and documents?

This priority question will assess the effect of new communication services on customer satisfaction, program integrity, and administrative efficiency. For example, we are developing a new communication service that appointed representatives may use to assist claimants with the applications and claims processes. The new service, called Appeals and Appointed Representative Processing Services (AARPS), enables appointed representatives to view claimant information, complete forms, and take actions on claims without the need to contact the field office or our National 800 number service. We will track usage of AARPS, obtain feedback on it from users, and assess the effects of AARPS on customer satisfaction, program integrity, and administrative efficiency.

The potential barriers to making changes to our communications with our customers and their representatives are the policy, technology, legal, privacy, and security requirements designed to maintain program integrity. As part of our agency commitments in *Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, we

will analyze and revise current regulations, forms, instructions, and guidance to remove requirements for physical signatures, consistent with applicable law and to the extent practicable.

We heard in comments on the *Request for Information* and from other sources that our notices and other communications can be difficult for our customers to understand. Although we made efforts to simplify notices, some of our notices and communications can be complex and lengthy, and difficult to comprehend. The difficulty can sometimes result from the complexity of our programs and legal requirements to communicate certain information. We will consider building evidence by sampling notices and other communications and assessing the quality and understandability of our communications. We will assess factors such as language reading levels, use of clear and easy to understand explanations without jargon, information targeted to customer needs, and language free of bias that could stereotype or demean groups of people based on disability, race, ethnicity, color, gender, and other personal characteristics.

Timeframe: FYs 2022-2026

Potential Data, Tools, Methods, and Analytical Approaches: We will convene focus groups to obtain qualitative information on customer needs and preferences and we will collect and analyze survey data to obtain information on communication preferences. We will use data from the University of Southern California's *Understanding America Study* to assess communication preferences from a nationally representative sample. We will use our newly proposed *Disability Research Surveys* to obtain information about the application experience from claimants who recently completed the process. We may consider new surveys of appointed representatives and representative payees to obtain information on their needs and preferences. We will use the work we are conducting on documenting customer journeys to identify pain points related to our communication methods. The results of this research will provide us with a clearer picture of our customer needs and preferences, which will help us prioritize specific communications methods to meet their needs.

We will conduct foundational fact-finding research on how other governmental agencies (e.g., U.S. Department of Veterans Affairs) and the private sector communicate with their customers. We will use the results from this research to identify communications methods that may be applicable for our purposes and assess the potential for such methods to make it easier for customers to communicate with us, while also maintaining program integrity and improving our administrative efficiency. If practical, we will pilot test some of these methods to determine whether they are suitable for implementing on a larger scale.

When we implement new communications methods, we will evaluate them to determine whether they are working as intended. For example, to evaluate the AARPS we will construct comparison groups using our program data from the period just prior to implementation and will explore other methods for forming comparison groups. We will estimate the effect of this communication service on the amount of time to make disability decisions, and the outcome of the decisions. We will track the use of the service and use feedback from users to assess features that are working effectively and aspects of the service that we need to improve or add. We will assess whether the new communication service has an adverse effect on program integrity compared to other communications methods. We will use the information from the evaluation to make improvements to the service and inform new efforts to improve communications with our customers.

To help expand the communication channels we provide for customers, we will conduct foundational fact-finding research on the potential trade-offs between accuracy in identity verification and the customer experience with our services. One component of this research will document the program integrity risks, as well as the legal and privacy risks, for our current methods of verifying identities. We

will assess the effects of new identity verification and authentication on the use of our services, customer experience, and program integrity.

We will test potential methods drawn from behavioral science to improve effectiveness and efficiency of our communications methods. For example, it may be possible to use behavioral science techniques to encourage claimants to provide us with information we need to process a claim or information we need to maintain program integrity. Such approaches may contribute to reducing additional burden to claimants and beneficiaries, improve administrative efficiency, and support program integrity.

We will build evidence to help us improve the content of our communications using purposeful sampling to identify a small number of our notices and other communications. We will assess the quality and understandability of the information presented and consider the effects on overall service quality. We will assess factors such as language reading levels, use of clear and easy to understand explanations without jargon, how the information is targeted to customer needs, and if the language contains bias that could stereotype or demean groups of people based on disability, race, ethnicity, color, gender, or other personal characteristics. We will conduct cognitive testing on notices and other communications to assess whether users understand the content, and how we might make improvements to them to promote communications that are more effective. We will obtain customer feedback on newly implemented notices, to ensure the notices convey the intended information. We will use our experience from this evidence-building activity to refine our methodology for developing notice and communications improvements.

Anticipated Challenges: We will need to make sure all activities we conduct related to our online services, notices, and communications satisfy legal and privacy requirements.

Proposed Solutions: We will consult internal stakeholders to ensure that we are complying with legal and privacy requirements. We will document any impediments to specific methods of communication. We will request research and development funding using our statutory authority, and we may explore the use of funding through government-wide mechanisms.

5 PRIORITY QUESTION

Does redesigning the Social Security Statement and providing supplemental fact sheets with customized information on Social Security's programs improve people's knowledge of the programs and increase the use of internet services?

Project Title: Evaluation of the Redesigned Social Security Statement

FYs 2022–2026 ASP Goal & Objective: Optimize the Experience of SSA Customers > Build a Customer-Focused Organization

Description: We redesigned the *Social Security Statement (Statement)* to streamline and modernize its content and design. We used plain language and a new design to make it easier to read and understand. We added new supplemental fact sheets with customized program and benefit information relevant for different customer demographics. We began supplementing the online *Statement* PDF with fact sheets in February 2021. We based the redesigned *Statement* on recommendations from the Social Security Advisory Board and the Government Accountability Office, as well as nationally representative survey research on the public's knowledge of the Social Security programs and their

communication preferences (Yoong et al, 2015; Alattar et al, 2019). We tailored the supplemental fact sheets for workers in different age groups and earnings situations. We launched the redesigned *Statement* online through *my Social Security* starting with a soft launch from May to September 2021. At the full launch of the online *Statement* in October 2021, we began providing the redesigned *Statement* and supplemental fact sheets by mail to people ages 60 or older and to all *my Social Security* account holders online.

Timeframe: FYs 2022–2024

Potential Data, Tools, Methods, and Analytical Approaches: We conducted usability and cognitive testing on the redesigned Statement and supplemental fact sheets to assess whether users can successfully access the new PDFs online and to ensure understanding of the content. We incorporated key findings from the usability and cognitive testing into the redesigned Statement and supplemental fact sheets before full release, including moving the Taxes Paid section to page two of the Statement to accompany the Earnings Record, updating the title and labels on the benefit estimates chart, updating the Medicare box to bold the penalty information and moving all the contact information to the end of the section, and making minor edits to the language throughout the Statement to improve understandability. After full release in October 2021, we continue to assess the feedback and plan to make additional improvements to the *Statement* in subsequent releases. We have and will continue to conduct random sampling of 800 number telephone calls, following the release of the fact sheets and redesigned *Statement* to assess whether there are any increased calls to our operations employees. We are tracking the number of visits to my Social Security (through vanity URLs on the redesigned Statement and supplemental fact sheets) and the characteristics of users (e.g., age). We will obtain data from the University of Southern California's *Understanding America Study* on people's program knowledge by age and whether they reviewed their *Statement*. The data is regularly collected every two years, so we can assess improvement in knowledge as it relates to how people access information on our programs over time.

Anticipated Challenges: Challenges include providing sample *Statements* and supplemental fact sheets in languages other than English and Spanish and providing *Statements* to customers who request special notice options (e.g., braille, large print, audio, etc.). We are actively working on solutions to these challenges, including translations of the sample *Statement* into 11 alternative languages and discovery sessions to assess the steps to provide the *Statement* to customers who are blind or visually impaired in alternative special notice options.

Proposed Solutions: We will work with the contractor to make the necessary changes to the *Statements* we mail to certain members of the public for subsequent releases.

REFERENCES

Alattar, Laith, Matt Messel, David Rogofsky, and Mark A. Sarney. 2019. "The Use of Longitudinal Data on Social Security Program Knowledge," Social Security Bulletin 79(4): 1–9.

Yoong, Joanne, Lila Rabinovich, and Saw Htay Wah. 2015. What Do People Know About Social Security? Paper No. 2015-22 CESR-Schaeffer Working Paper Series.

6 PRIORITY QUESTION

Does the working-age population have accurate knowledge of the Social Security disability programs, and to what extent does the working-age population's knowledge, attitudes, and perceptions of the Social Security disability programs influence the decision to pursue benefits?

Project Title: Assessment of the Public's Knowledge of the Disability Programs and How that Knowledge Affects the Decision To Pursue Disability Benefits

FYs 2022–2026 ASP Goal & Objective: Optimize the Experience of SSA Customers > Build a Customer Focused Organization

Description: Our disability programs, Social Security Disability Insurance (DI) and Supplemental Security Income (SSI), have changed over time and our policies have evolved, creating a level of complexity that can be difficult for the public to understand. We need information on the working-age population's knowledge of the disability programs to help us improve the way we communicate with them about their options, responsibilities, and rights.

Responding to this priority question will provide us with evidence on the kind of general information working-age adults (18 to 64 years old) have about our disability programs. We will use this information to make changes that will sustain the programs' effectiveness and ensure that our disability programs continue to benefit the people we serve, now and in the future. Prior studies of working-age adults' knowledge about our disability programs rarely examined behavioral and subjective factors that affect individual decisions about applying for benefits in the face of work-limiting conditions. Notably absent in prior studies is attention to the level of program knowledge people have about our disability programs and what role that knowledge ultimately plays in decisions to apply for benefits.

We awarded a contract for a new *Disability Perceptions Survey*. We will use the survey to collect information on knowledge, perceptions, and opinions working-age adults have about the disability programs. We will use data from the survey linked to SSA program data to assess whether current knowledge of the disability programs affects future decisions to seek benefits. We expect that the survey will provide insight into the most effective ways to communicate with the public about our disability programs and how knowing about our programs influences their claiming behavior.

In August 2021, we collaborated with our contractor to develop a revised draft survey instrument and a sampling plan. We also conducted a related system security audit and received OMB approval to conduct the pre-test. We completed the pre-test in November 2021.

Timeframe: FYs 2022-2024

Potential Data, Tools, Methods, and Analytical Approaches: The Disability Perceptions Survey is new, and the initial work involved the development of survey questions that we will use to obtain information from working-age adults about their knowledge and understanding of the disability programs. As we developed the survey questions, we worked with our contractor to conduct rigorous cognitive testing and pre-testing of the survey questions. This component of the project is critical as it forms the foundation for the planned analytical work. We expect that this work will increase the evidence on effective ways to elicit information from the public on knowledge, perceptions, and opinions.

After we develop and administer the survey questions to our target population of working-age adults, we will use descriptive statistics and cross-tabulations to obtain baseline information on knowledge, perceptions, and opinions about the programs. We plan to examine differences across relevant subgroups based on demographic, socioeconomic, and health characteristics. We plan to use relevant multivariate statistical methods (e.g., regression analysis) to examine the association between the characteristics and program knowledge, perceptions, and opinions. The results of this analysis will provide us with insight into the most effective ways to communicate with the public about the disability programs, as well as project the anticipated need for future benefits among working-age adults.

We plan to conduct longer-term analysis on the association between program knowledge, perceptions, opinions, and the anticipated need for future benefits on subsequent disability applications and awards. This will involve linking the *Disability Perceptions Survey* data to SSA program data. Our analytical approach will involve specifying relevant multivariate models (e.g., logistic regressions, survival analysis models) to estimate the association between the level of disability program knowledge, perceptions, opinions, and anticipated future need for disability benefits on applications and awards. The results of this analysis will provide us with insights into the role those factors ultimately play in decisions to apply for disability benefits.

Anticipated Challenges: Because the *Disability Perceptions Survey* is a new survey, we anticipate challenges in developing survey questions that will provide useful information on knowledge, perceptions, and opinions. Obtaining a good response rate to the survey is another anticipated challenge and our goal is a nationally representative sample. We stratify by region, race, age, and sex, with oversampling of Native Americans, people living in rural areas, and individuals with low income to allow for subgroup analyses.

Proposed Solutions: We will use the expertise of our contractor to develop survey questions and we will conduct rigorous cognitive testing and pre-testing of the survey questions. We will use our previous experience working closely with OMB to obtain clearance, and we will have a contingency plan if there are delays. We will provide reasonable incentives for respondents to complete the survey and, if the response rate is below 80 percent, we will prepare a non-response bias addendum to the final report.

7 PRIORITY QUESTION

To what extent are there systemic barriers to hiring, developing, and advancing a diverse and talented workforce and what are the effects of our Action Plan to mitigate those barriers in support of our goal to build an inclusive, engaged, and empowered workforce?

Project Title: Assessment of Employment Barriers and Mitigation Efforts

FYs 2022–2026 ASP Goal & Objective: Build an Inclusive, Engaged, and Empowered Workforce > Promote Diversity, Equity, Inclusion, and Accessibility in Hiring and Advancement

Description: We are committed to promoting diversity, inclusion, fairness, and equity in our workforce. To build a successful organization with these values, we need to continue attracting and retaining employees who are committed to our mission, dedicated to providing high quality services to all our customers, and who represent the public we serve. Promoting diversity, equity, inclusion, and accessibility in our hiring, career development, and employee retention efforts is critical to meeting our commitment.

Regular assessments of the barriers that some groups may encounter with our hiring and career advancement activities provide us with the baseline information we need to achieve our ASP goal. We created a Barrier Analysis program that complies with the Equal Employment Opportunity Commission's (EEOC) guidelines. As part of our Barrier Analysis program, we conduct annual assessments that identify areas where barriers might impede free and open competition in our workplace. We examine statistical data and trends to determine what barriers exist. We utilize various data sources such as applicant flow data and workforce data to identify and analyze triggers also referred to as "red flags." In addition, we investigate triggers to pinpoint actual barriers and root causes.

We use the findings from the barrier analysis to develop an action plan designed to mitigate and ultimately eliminate identified barriers. We collaborate with senior managers and other stakeholders to identify and eliminate agency policies, procedures, or practices that limit employment opportunities in the workplace. For example, our analysis identified that some groups are underrepresented in leadership positions within our agency. One objective in our action plan is to increase the number of participants from underrepresented groups in our National Leadership Development Program (NLDP), which is a source for developing potential leaders. Our plan includes analyzing existing data to identify trends in the selection process of the NLDP and to determine strategies that may encourage applicants to apply for the NLDP. Our intended result is increased participation among underrepresented groups. We will develop an evaluation plan that will provide us with information on whether such strategies are working as intended.

We will also assess practices used by other government agencies or by the non-government sector to identify proven methods for gathering data, analyzing data and results, and addressing identified systemic barriers to hiring and developing a diverse, equitable, and inclusive workforce. This assessment will help us determine additional data that we may need to collect, how we might better leverage existing data such as the Federal Employee Viewpoint Survey, and whether we should test or implement practices that appear to be effective in other settings.

Our Diversity, Equity, Inclusion, and Accessibility Self-Assessment identifies actions that may promote an inclusive, engaged, and empowered workforce. One action within the plan is to develop an implicit bias training curriculum, which has been implemented. Implicit or unconscious bias may influence our decisions on hiring, promoting, and retaining talented individuals from some groups. Implicit bias training is expected to improve self-awareness among our entire workforce including hiring officials and our leadership team. Greater awareness is expected to promote creation of a workforce that exemplifies our commitment to diversity, inclusion, fairness, and equity.

Timeframe: FYs 2022-2026

Potential Data, Tools, Methods, and Analytical Approaches: Our Barrier Analysis program uses workforce data to analyze employee demographics by gender, racial and ethnic background, and disability status to identify potential barriers. We use these data to determine if each group has equal opportunity throughout all facets of their employment, such as equitable distribution in pay grade levels, including higher grades. We use these data to analyze whether the composition of employees at each grade level is representative of our agency workforce and of the larger civilian labor force.

We follow the EEOC's Management Directive 715 (MD-715) to conduct the analysis. We have been completing the MD-715 annually, including the barrier analysis portion, since at least 2008. The MD-715 requires us to review the following data annually as a part of identifying triggers:

 Total workforce distribution by race, national origin, and sex for both the permanent and temporary workforce;

- Permanent and temporary workforce participation rates for each grade level by race, national origin, and sex;
- Permanent and temporary workforce participation rates for each of the agency's major occupational categories by race, national origin, and sex;
- Participation rates in supervisory and management positions by race, national origin, and sex;
- The race, national origin, and sex of applicants for permanent employment;
- The rates of selections for promotions, training opportunities and performance incentives by race, national origin, and sex; and
- The rates of both voluntary and involuntary separations from employment by race, national origin, and sex.

We complete additional analyses for transactions such as hiring, promotions, awards, and separations to determine our successes or shortcomings related to having an inclusive and engaged workforce. When we identify specific areas where a group is underrepresented or overrepresented, we conduct stakeholder meetings with those involved in the hiring and recruitment process within their respective components to determine if a policy, procedure, or practice is limiting employment opportunities. This analysis helps us identify actions needed to mitigate or eliminate identified barriers.

We will couple actions to mitigate or eliminate barriers with data and methods to evaluate whether the actions are having the intended effect. Our strategy will include the following.

- We will work with key stakeholders within our agency, including our Diversity and Inclusion Council, to mitigate barriers by providing mentor programs, workshops, and outreach for underrepresented groups. For example, we have partnerships with over 400 local colleges and universities, many of which are Historically Black Colleges and Universities, Hispanic Servicing Institutions, Tribal Colleges and Universities, and other similar groups. Members of SSA's Recruitment Cadre attend career fairs throughout the year and provide information regarding our Pathways programs.
- We will continue to recruit and advertise external vacancies open to all U.S. citizens regardless
 of race, color, religion, sex (including pregnancy, sexual orientation, gender identity, and gender
 expression), national origin, political affiliation, marital status, disability, genetic information, age,
 membership in an employee organization, equal employment opportunity protected activity,
 parental status, military service, or other non-merit factor. We also encourage components to
 take advantage of special hiring authorities specific to targeted populations such as individuals
 with disabilities and veterans.
- We will evaluate the effects of our efforts using our workforce data on employee characteristics
 to measure whether the efforts lead to increases over time in the share of underrepresented
 groups who apply for and participate in our NLDP, and who serve within GS-13/14/15 and SES
 positions.
- We will use data from Federal Employee Viewpoint Survey to measure whether we see improvements in employee perceptions on engagement and inclusion. We propose to explore collecting additional data about our career development programs.

The agency will continue to review, discuss, and track progress with key stakeholders.

Anticipated Challenges: Our ability to collect and analyze data through a variety of methods is limited to available data; and we are committed to fulfilling any labor negotiations required.

Proposed Solutions: We will work closely with our employee unions.

8 PRIORITY QUESTION

What factors contribute to Federal court remands of disability decisions, and what are the effects of modifying relevant factors on the percentage of final decisions that are affirmed upon judicial review?

Project Title: Analysis of Federal Court Remands

FYs 2022–2026 ASP Goal & Objective: Ensure Stewardship of SSA Programs > Improve the Accuracy and Administration of Our Programs

Description: On judicial review of our agency's final decisions (mostly denials of initial claims for disability benefits at the hearing or Appeals Council levels), the Federal courts consistently remand roughly half of all cases, even as the agency's regulations, case law applied by the Federal courts, agency quality and training initiatives, and other variables have changed. See, e.g., "Court Remands as a Percentage of New Court Cases Filed" (an average remand percentage of approximately 47 percent since FY 2010). This priority question seeks to determine reasons for the high remand rate and propose strategies for improvement.

Timeframe: FYs 2022-2024

Potential Data, Tools, Methods, and Analytical Approaches: The agency collects data on decisions, court dispositions, and the reasons for court remands. There have been studies on aspects of this issue. For example, in 2016, the Administrative Conference of the United States issued the report, "A Study of Social Security Litigation in the Federal Courts." The report identified variables for consideration such as the variations in the remand rate between Federal district courts, circuit case law, and the quality of decision writing. We have examined existing data and prior studies and engaged subject matter experts across relevant components to propose methods and analytical approaches for a discrete number of pilot projects or other interventions that would most likely result in measurable improvement. We have preliminarily identified five research areas under the umbrella of this priority question that appear promising for further data collection and analysis or for potential pilot projects. Next, we will begin specific activities that could include data collection and analysis, pilot projects, and other interventions to test outcomes. As analyses or projects are completed, we will examine the results and recommend changes in agency business processes.

Anticipated Challenges: Because there are several variables that affect the court remand percentage, it may be challenging to isolate one variable from others for analytical study. In addition, some pilot projects that test interventions at the hearing level of our administrative review process may take time to evaluate because it can take anywhere from 18 months to two years from the date an administrative law judge issues a decision until a Federal court issues its decision on judicial review. We will also need to ensure all projects comply with privacy and legal requirements.

Proposed Solutions: We are in the process of completing an initial data analysis phase and, based on the results, we will narrow our focus to five areas relevant to the judicial review of final agency decisions that will meet the agency's objectives for this priority question. Our criteria for selecting these areas are that they lend themselves to research initiatives based on data, have a realistic chance of improving court results, are achievable with existing resources within the timeframe of this *Learning* Agenda, and the data needed can be collected and shared while still preserving any applicable legal privileges. We expect to complete this initial phase in FY 2022. We will consult internal stakeholders to ensure that we comply with legal and privacy requirements.

9 PRIORITY QUESTION

What are the effects of simplifying administrative rules and requirements on reducing the burden on program participants and supporting program integrity?

Project Title: Analysis of Program Simplification Proposals

FYs 2022–2026 ASP Goal & Objective: Ensure Stewardship of SSA Programs > Improve Organizational Performance and Policy Implementation

Description: Many of our administrative rules and requirements are complex and the complexity can be burdensome to those filing an application for benefits, their representatives, beneficiaries, and representative payees. Some administrative rules and requirements may have unintended consequences, such as discouraging beneficiaries from seeking or maintaining employment. In this priority question, we will examine the tradeoffs involved with simplifying administrative rules and requirements. Specifically, we will examine whether potential program simplification can reduce burden for claimants and beneficiaries, and reduce costs (time, stress, and financial) while maintaining program integrity.

We will document user journeys for our core processes associated with the OASI, DI, and SSI programs, including applications for benefits, the appeals process, SSI redeterminations, continuing disability reviews, and post-entitlement reporting requirements. We will use these documented journeys to identify specific rules and requirements that are good candidates for simplification, and we will assess the extent to which specific simplification proposals may reduce administrative burden without significantly reducing program integrity. As part of this effort, we will assess whether the burden associated with specific rules or requirements vary by demographic group and assess the potential effects of simplification on improving equity.

We will identify opportunities to leverage other policy tools that may reduce administrative burden. For example, during the COVID-19 pandemic, we issued a temporary final rule for the musculoskeletal disorders listings that changes the "close proximity of time" requirement from four months to 12 months as a reasonable time frame for providing medical evidence to satisfy the level of severity needed to meet the listings. We will evaluate this temporary rule and use the findings to assess whether permanent changes may be warranted. Another opportunity that we will pursue is an assessment of the extent to which streamlined forms and reporting processes reduce burden and maintain program integrity.

The DI program includes a set of work incentives, which are special rules, intended to help beneficiaries enter, re-enter, or continue their engagement in the workforce by protecting their eligibility for cash payments and health care coverage until their work allows them to be self-sufficient. As Congress revised these work incentives over the years, the rules have become increasingly complex, making it difficult for beneficiaries to understand how work will affect their benefits. As a result, rules intended to encourage work may end up having the opposite effect. We will explore options to simplify the post-entitlement earnings rules in the DI program. We will look at the patterns of health care coverage for beneficiaries who leave the DI rolls due to work. We will explore beneficiaries' understanding of current rules and preferences for alternative treatment of earnings.

Timeframe: FYs 2022-2025

Potential Data, Tools, Methods, and Analytical Approaches: We will systematically map out end-to-end disability customer journeys to identify pain points along these entire journeys. These customer journey maps identify the number of touchpoints people have with the agency from start to finish and how much time the process takes at each stage and cumulatively. Our initial efforts will focus on two of our high impact services: (1) filing for retirement benefits, and (2) applying for a Social Security number replacement card. Subsequent efforts will focus on filing for disability benefits. This activity will support our annual process of assessing our capacity to manage the customer experience, assessing our performance delivering services through meaningful measures from the perspective of the public, and planning for the improvement of the customer experience as described in *Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*.

We will complete an assessment of the temporary final rule for the musculoskeletal disorders listings that changes the "close proximity of time" requirement from 4 months to 12 months. We will use program data to complete an assessment of the effects of the key changes of the "close proximity of time" temporary rule on disability applicants at 6 months and 12 months after implementation.

We will conduct foundational fact-finding research to identify other methods of reducing burden, such as investigating opportunities to streamline the SSI application. Other potential areas may include reducing burden associated with dedicated accounts, representative payee accounting, and other reporting responsibilities for beneficiaries and their representatives.

We will use qualitative and quantitative methods to explore options for simplifying DI work incentives. We will use surveys such as the *Disability Research Surveys* and focus groups to learn about beneficiaries' understanding of current rules, reasons for working and for not working, and to assess preferences for various alternative methods of counting earnings. We are finalizing a data-matching agreement with the Centers for Medicare & Medicaid Services to analyze patterns of health care utilization that will allow us to learn about the prevalence of private health insurance for beneficiaries leaving the rolls due to work, and to understand the timing of Medicare termination in relation to work activity. We will use the results of the current Promoting Opportunity Demonstration (POD) to determine the effect of alternative policy treatments on work activity.

Anticipated Challenges: Each new data collection activity will require Paperwork Reduction Act clearance from OMB. Additionally, new projects may require contracts or other similar agreements that take time to develop. There may be data limitations on what we can use for research purposes or what the agency collects that will limit what analyses we can do. Finally, our authority to initiate projects under section 234 of the Social Security Act terminated on December 31, 2021, which limits our ability to test DI program changes using the authority in section 234 unless Congress extends those dates.

Proposed Solutions: We have planned sufficient time to receive Paperwork Reduction Act clearance, legal and privacy review, and enter into necessary agreements based on experiences with similar projects. We are in the process of modifying our system of record notices to update their routine uses to allow for additional research. Finally, we will continue to explore options for renewing our DI demonstration authority, in addition to using a variety of evidence-building methods, as mentioned above.

10 PRIORITY QUESTION

What are the effects of improving collaboration and enhancing data sharing with external agencies on saving citizens time from reporting required information, reducing labor market barriers, improving program solvency projections, improving program administration, and reducing improper payments?

Project Title: Development and Evaluation of Interagency Collaborations

FYs 2022–2026 ASP Goal & Objective: Ensure Stewardship of SSA Programs > Improve Organizational Performance and Policy Implementation

Description: Collaborations and data exchanges with other agencies help us deliver our services more equitably and effectively to the people we serve, especially to those who have been historically underserved. We collaborate and exchange data with many Federal partners, including the Internal Revenue Service (IRS), and the Departments of State, Health and Human Services, Homeland Security, Justice, Veterans Affairs, Labor, and Housing and Urban Development. This priority question will assess specific ways we may expand or enhance collaborations to meet one of our commitments in *Executive Order 14058* on *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government,* which is to maximally support applicants and beneficiaries to identify other benefits for which they may be eligible and integrate SSA data and processes with those of other Federal and State entities whenever possible. It will also support a focal area in our *Equity Action Plan*.

Collaborations and data exchanges have the potential to improve our performance and policy implementation in ways that will help eliminate barriers to fully participating in and benefiting from our programs. For example, collaborations and data exchanges may result in reducing the burden our customers experience as they attempt to navigate processes that can be daunting; and to understand policies and procedures that are very complex, in part because our programs have evolved to be complex over many years of legislative changes. By working with our Federal, State, and local government partners, we can redesign and streamline our programs to ensure that our customers are receiving benefits and services in an efficient and equitable manner. Improved collaborations and data exchanges can also enhance our ability to make well-informed program solvency projections, assess legislative proposals, improve service delivery, improve employment outcomes for beneficiaries, and safeguard the integrity of benefit programs to better serve our customers.

To deliver our programs more equitably, we need to increase the collection and use of data on race and ethnicity and conduct distributional analyses to identify potential inequities in the administration of our programs and policies. We will explore how collaboration with other agencies and data exchanges could improve our ability to collect and use race and ethnicity data for statistical purposes without

imposing unnecessary burden on the public to provide that information. This activity will also inform a focal area in our *Equity Action Plan*.

As part of administering our programs, we provide benefit verifications to our beneficiaries upon request. We will examine how improved collaboration with other Federal agencies may increase our ability to provide this service to the public efficiently. For example, although we currently have a data sharing agreement that allows the Department of Housing and Urban Development to complete benefit verifications without placing additional burden on our beneficiaries, in many instances, our beneficiaries continue to directly contact us for such benefit verifications. We will identify and analyze methods to improve coordination of our benefit verification services with other Federal agencies. We will also assess the extent to which improved coordination reduces administrative burden to the public and improves our administrative efficiency, which is consistent with Executive Order 14058 on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government.

We received feedback related to the process of issuing new Social Security numbers and cards to lawfully admitted immigrants (refugees, asylees, Special Immigrant Visa recipients, Trafficking Victim Assistance Program recipients, etc.). Specifically, we heard from stakeholders that their clients' Social Security cards were delayed due to an inadequate communication system between the Department of Homeland Security and SSA. We will conduct foundational fact-finding research to assess the extent of the problem, and to identify potential methods for working more effectively with the Department of Homeland Security to reduce administrative burden and increase administrative efficiency.

We will explore potential collaborations with other Federal agencies (e.g., Department of Labor and Equal Employment Opportunity Commission) that may reduce labor market barriers, such as employment discrimination, and increase employment for people with disabilities. At this point, this effort will consist of preliminary foundational fact-finding research.

IRS forms 1040 filed by taxpayers and IRS forms 1099-R data will be useful to the Chief Actuary for making estimates of future trust fund status and evaluating legislative proposals. Data from these IRS sources would allow for: (1) improved modeling of taxation of benefits for both current-law and legislative proposals; and (2) improved tax revenue estimates under current law (e.g., the Affordable Care Act's additional Medicare tax) and proposed legislation involving taxation of earnings determined by filing status. Given legal limitations to shared Federal tax information, we plan to explore whether there are options to access SSA program data linked to data from the IRS forms 1040 filed by taxpayers and IRS forms 1099-R.

Timeframe: FYs 2022–2026

Potential Data, Tools, Methods, and Analytical Approaches: We will conduct foundational fact-finding research on the extent to which benefit verifications cause increased and potentially unnecessary administrative burden on our beneficiaries and reduce the efficiency of our operations. Such fact-finding will inform estimates of how such benefit verifications currently increase beneficiaries' administrative burden (defined as hours spent by the public obtaining a benefit verification) and increase our administrative costs (defined as hours and associated costs of our employees issuing benefit verifications). Based on such fact-finding, we will consider how improved coordination of such benefit verifications with other Federal agencies might reduce our costs and the burdens on our beneficiaries. We will discuss the results of our fact-finding with our counterparts at other Federal agencies and may enter into agreements with those agencies to develop projects that would address these costs and burdens.

We will conduct foundational fact-finding research on potential collaborations with other Federal agencies such as the Departments of Homeland Security, Justice, and Labor. The results of such

efforts will help us define potential projects that improve our ability to evaluate equitable delivery of services, remove barriers to accessing needed services, remove employment barriers, or improve the administration of our programs.

If we can obtain access to SSA program data that has been linked to IRS 1040 forms filed by taxpayers and IRS 1099-R forms, we will use that data to construct a counterfactual that represents an ongoing data exchange incorporating the additional IRS data. We will estimate effects by comparing program stewardship and policy analysis that would occur with the use of additional IRS data to program stewardship and policy analysis that occurs under existing conditions (i.e., without the additional IRS data). This assessment would provide an initial description of the value of additional IRS data.

Anticipated Challenges: We will need to consult with internal stakeholders to ensure that we are meeting all legal and privacy requirements. In some instances, we are required by law to be reimbursed for sharing data with other Federal agencies, which may create challenges for other agencies to collaborate with us. When proposals involve other agencies, we will need to consult them to determine the viability of any proposed data exchange.

Proposed Solutions: We will consult with our internal stakeholders early in the process to ensure that we are meeting legal and privacy requirements. We will reach out to other Federal agencies to discuss potential projects that would benefit both agencies and strive toward cost-effective strategies and reimbursement agreements.

REFERENCE

Bee, Adam, and Joshua W. Mitchell. 2017. "<u>Do Older Americans Have More Income Than We Think?</u>" Social, Economic, and Housing Statistics Division Working Paper Series #SEHSD-WP2017-39. Washington, DC: U.S. Census Bureau.

Dushi, Irena and Brad Trenkamp. 2021. "Improving the Measurement of Retirement Income of the Aged Population," ORES Working Paper #116.

APPENDIX A: REQUEST FOR INFORMATION

For this *Learning Agenda*, we sought input from external stakeholders by publishing a <u>Request for Information</u> in the Federal Register on April 20, 2021. We received 18 comments (available at <u>www.regulations.gov</u>). Comments generally fall into one of the five categories listed below.

Agency communications: Commenters noted that information we provide to the public is not always clear and easy to understand. The issues include language in our notices, communications with people who have limited English proficiency, and information provided by our employees. Commenters noted limitations related to within-agency communication such as information from customers not being available to other agency employees.

Coordinating services and information across agencies: Commenters noted opportunities to improve data sharing and collaboration in delivering services. These include opportunities to improve how we exchange data with the Department of Homeland Security to deliver services to immigrants and refugees, and opportunities to share data across agencies that could result in improved service delivery for our beneficiaries.

Data Limitations: Commenters identified the agency's limited data on race and ethnicity as a significant issue.

Service delivery: Commenters identified issues with service delivery delays, challenges with the methods we use for the public to provide information to complete their business with us, and perceived inequities with service delivery. Commenters identified specific issues related to equitable delivery of services to immigrants, refugees, and people of color.

Work incentives and the Ticket to Work Program: Commenters noted limitations with the current set of work incentives and the Ticket to Work Program. The issues related to work incentives include the need to maintain health care coverage through the Medicare or Medicaid programs, fears about losing access to needed benefits, and confusion about how work affects benefits. Simplification of our policies and communication were two themes in the comments related to work incentives. Comments related to the Ticket to Work Program include addressing disparities between vocational rehabilitation and organizations serving as employment networks.

Comments from Individuals

We received comments from eight individuals that included the following suggestions for research, evaluation, and program changes.

Comments about work incentives and Ticket to Work

- Change the DI trial work period to 18 months instead of 9 months.
- Base the substantial gainful activity limit on the cost of living in different areas.
- Reform the cash cliff so people with blindness and people without blindness have the same work incentives.
- Change how DI and the trial work period work so the reduction of cash benefits is more gradual.

- Increase the resource limit for SSI eligibility because it prevents people from pursuing work and accumulating savings for long-term goals. Achieving a Better Life Experience (ABLE) accounts help but are only for people whose disabilities began before age 26.
- Provide employment networks with an initial timely payment for providing services that include resume writing, career assessment, and guidance.
- Offer more training on how the Ticket to Work program could be bundled with other funding sources.
- To help ticket holders understand how work affects their benefits, have all vocational rehabilitation agencies require (1) work incentives planning and assistance and (2) community work incentives coordinators' services at the start.

Comments on other subjects

- Consider informational videos to help people understand the paperwork and processes involved with applying for benefits.
- Hire additional staff to review and process claims faster.
- Improve telephone service to reduce wait times to speak with an SSA representative and make sure representatives are providing accurate information.
- Send notices to beneficiaries in plain language that is easier to understand.
- Provide Medicare sooner because people might not have access to employer-based insurance or Medicaid prior to the start of Medicare.
- Related to the COVID-19 pandemic, improve evidence verification requirements to reduce the need for people to mail important documents to Social Security.

Comments from Organizations

We received comments from ten organizations including providers of care for people with disabilities, advocacy organizations, and businesses who provide services related to research and evaluation. Comments included the following suggestions for research, evaluation, and program changes.

Community Options Individual and Family Services in Nebraska provides parent and family support services, and employment assistance; and is an employment network for the Ticket to Work program. Community Options shared that people fear the loss of health care coverage in addition to loss of cash benefits. Simplifying SSI rules, especially as it relates to Medicaid eligibility, would help when people attempt work. For employment networks, Community Options noted differences in payment methods for vocational rehabilitation agencies. People who could benefit from services might not work at the trial work level required for employment networks to be reimbursed.

Interfaith-RISE in New Jersey provides services for immigrants and refugees. This organization noted challenges their clients experienced during the pandemic: delays receiving Social Security cards needed for employment, difficulty contacting Social Security by telephone especially for non-English speaking people, Social Security staff who are not aware of eligibility for cards, and delays with getting appointments.

Cornerstone Montgomery in Maryland is a comprehensive behavioral health provider with services that include acute care and community-based treatments such as supported living. This

organization states that beneficiaries are confused about our policies, benefits, and the impact of work on benefits. They suggest, if there was more education about benefits and work incentives, more people may be willing to work or increase work. They note that communication with Social Security is challenging because of long wait times for telephone calls and the need for many people to have a third party involved.

Mathematica applies expertise in data, methods, policy, and practice for Federal agencies, state and local governments, and other organizations and businesses. Mathematica suggested that Social Security consider evidence-building activities in two areas and identified several priority questions for each area: (1) how collaboration with other agencies could improve services for people with disabilities, and (2) how simplifying program rules and the administration of benefit payments could help people with disabilities improve employment-related outcomes. Specific questions focused on state differences in disability applications and awards, outreach to ensure equitable access to program benefits, improving employment rates for people with disabilities, and reporting of earnings.

National Employment Network Association (NENA) is a national organization of employment networks that provides training, operational support, and advocacy to members certified for the Ticket to Work program. NENA commented about several areas of concern related to Ticket to Work and our benefits programs including improvements in these areas: overpayments and notices, work incentives, earnings reporting, health insurance, and educating beneficiaries about our programs. NENA suggested research in two areas: (1) including beneficiaries ages 16 – 18 in the Ticket to Work program, and (2) utilizing field offices to inform beneficiaries about return-to-work incentives and programs.

National Organization of Social Security Claimants' Representatives (NOSSCR) is a specialized bar association for attorneys and advocates who represent DI and SSI claimants throughout the adjudicative process. NOSSCR encourages Social Security to follow the Consortium for Citizens with Disabilities' demonstration principles that recommended changes related to demonstration projects, work incentives, and helping beneficiaries obtain employment. NOSSCR suggested research or changes in the following areas: improving the disability application process, improving the process for claimant representatives, incentives to encourage work, and revising SSI requirements and the expansion of SSI to Puerto Rico and other U.S. territories.

Justice in Aging is a national legal advocacy organization focused on using the power of law to fight senior poverty by securing access to affordable health care, economic security, and the courts for older adults with limited resources. Justice in Aging urges Social Security to regularly collect, report, and analyze data about (1) the race and ethnicity of claimants and beneficiaries, and (2) language access services for people with limited English proficiency. Justice in Aging cited the importance of this data to assess differences in earnings and benefits allowance rates, and to improve services for people with limited English proficiency.

Center toward Self Reliance in Colorado is an independent living center for people with disabilities and provides core services in advocacy, independent living skills, transition services, peer support, and information and referral. This organization suggests improvements in two areas. First, make the system easier to understand. For example, when filling out forms, provide instructions for more difficult questions. Second, timely accessing Social Security agents is an issue for agencies that help consumers navigate through the system.

DALBAR, Inc. serves as an independent expert for evaluating, auditing, and rating business practices, customer performance, product quality, and service. DALBAR noted that Social Security would benefit from a program that would enhance public perception of how secure the agency is

from fraud and data breaches. DALBAR suggested that greater security perceptions reduce attacks, and that research would show perceptions of the agency's security including reliability of anti-fraud measures, consequences of attempting a breach, and threat of audits to detect violations.

SAS Institute is a company that provides analytics solutions to transform data into intelligence. SAS provided a document with marketing information that describes the approach they would take to help Social Security with data-driven solutions.













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