

**Transition Report for the New Commissioner of Social Security:
How to Ensure the World Class Services the American People Deserve**

These sections are excerpted from Appendix B – Summary of Policy and Administrative Recommendations found on pages 26-27 of the report.¹

Improving Access and Customer Service

Access for Limited English Proficient Individuals

- Develop a plan for translating all notices into Spanish and into the other major languages spoken by beneficiaries of SSA programs, starting with SSI program.
- Do more to ensure that SSA's policy on interpreters is uniformly applied
- Make compliance with the interpreter policy part of monitoring the performance of state DDSs.
- Make a concerted effort, as hiring opportunities arise, to hire more bilingual staff for assignment to field offices, as this is the best and most economical means of serving LEP individuals.
- Make informational publications in different languages and English available and visible to people who visit local offices.
- Develop a plan for regularly distributing print versions of these informational publications to community groups serving targeted language groups.

SSI Education and Outreach

- Do not restrict to people within two months of 65 the requirement that SSDI applicants receive an explanation of SSI requirements if not clear their SSDI benefits would disqualify them for SSI.
- Anyone who files for Title II old-age benefits before age 65 and has a low enough Title II benefit to potentially qualify for SSI should automatically be sent a reminder at age 65 that they now meet the age requirement for SSI.
- Consider sending a reminder about possible SSI eligibility periodically (e.g., once every five years with the COLA announcement) to beneficiaries with low Title II benefits.
- Request greatly increased funding for outreach to homeless populations, and provide special training to specialized claims representatives on some of the unique problems they face in processing SSI claims for homeless people.

¹Strengthen Social Security Coalition, [*Transition Report for the New Commissioner of Social Security: How to Ensure the World-Class Service the American People Deserve*](#), February 2013

Timely and Accurate Initial Determinations, Hearings and Appeals

Initial Determinations:

- Improve the SSI application process by providing an option for individuals to complete an online application for SSI.
- Continue and expand efforts to accelerate decisions for people whose conditions are the most severe and/or terminal.
- Provide more assistance to claimants at the application level, explaining to the claimant what evidence is important and necessary.
- Ensure that Disability Determination Services obtain necessary and relevant evidence.
- Expand the list of “acceptable medical sources” to include nurse practitioners, physician assistants, and licensed clinical social workers.
- Increase reimbursement rates for providers responding to requests for medical records.
- Provide better explanations to all providers about the disability standard.
- Provide guidance to adjudicators on proper application of important evaluation rules.
- Improve the quality of consultative examinations.

The Disability Appeals Process:

- Consider increasing the time for hearing notices from the current 20 days to 75 days
- Consider helping claimants obtain representation earlier in the process, so that files are more complete earlier in the process.
- Retain Administrative Law Judges (ALJ) as the adjudicators for the hearing requirement in the Social Security Act.
- Consider rescinding the policy that keeps the ALJ’s identity undisclosed until the hearing.

Appeals of SSI Suspensions and Benefit Reductions:

- Improve functioning of process for appealing proposed SSI suspensions and benefit reductions.
- Develop uniform, automated process for inputting requests for reconsideration into the system.
- Implement a system for tracking reconsiderations that are processed.
- Develop automated system for benefit continuation triggered upon filing of a request for reconsideration.
- Devote more resources to training staff on the reconsideration process and due process.