SOCIAL SECURITY ADVISORY BOARD

STATEMENT ON THE SUPPLEMENTAL SECURITY INCOME PROGRAM

MAY 2005
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Public Law 104-193 requires that members of the Social Security Advisory Board be given an opportunity, either individually or jointly, to include their views in the Social Security Administration’s annual report to the President and the Congress on the Supplemental Security Income (SSI) program.

We appreciate the opportunity to present our views on this important program, and we have asked the Social Security Administration to include the following statement of views in this year’s annual report.

VIEWS OF THE BOARD REGARDING THE SSI PROGRAM

In presenting our views this year, we would like to comment on three aspects of the SSI program: work incentives, wage reporting, and simplification of the program’s provisions on living arrangements and in-kind support and maintenance.

ENCOURAGING SSI BENEFICIARIES TO WORK

In our 2003 report on the definition of disability1, we discussed bringing the half-century old disability program up to date with the changes that have occurred in the economy, in medicine, in rehabilitative technology, and in attitudes toward disability and the disabled. The SSI program uses the same definition of disability as the disability insurance program and has many other elements in common, including the need for timely and accurate maintenance of earnings reports, discussed below.

SSI has some different work incentives, however, and attention should be paid to updating them as well. The SSI program was designed with more generous disregards for income, especially earned income, than the old assistance programs it replaced. The report of the House Ways and Means Committee on the original legislation described the program as providing incentives and opportunities for those able to work that would enable them to escape dependency. When it was enacted in 1972, the program allowed $20 of income from any source and earnings of $65 per month without any effect on benefits. Earnings above that amount reduced benefits by $1 for every $2 earned. These amounts, referred to as general income and earned income disregards, were not indexed and have not changed since 1972. If they had kept pace with inflation, they would now be about $90 and $290 per month, allowing disabled beneficiaries to earn up to $380 per month without reducing their benefits.

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For the last 15 years, the percentage of all disabled SSI beneficiaries who work has been fairly stable, fluctuating around 6 percent.

Younger beneficiaries are more likely to work than older ones.
The amount of their earnings varies widely, and a quarter of those who work have earnings below $65 per month.

There are also some interesting differences by diagnosis.

Two-thirds of the workers have a mental disorder, including 42 percent with a diagnosis of mental retardation. By comparison, 56 percent of all disabled SSI beneficiaries have a mental disorder, including 22 percent with mental retardation.
In addition to the disregards discussed above, there are other work incentives that are used by some SSI beneficiaries who work, including:

- **Continuation of Medicaid eligibility** – Medicaid eligibility will usually continue even if beneficiaries earn too much to receive SSI payments, if they cannot afford similar medical care and depend on Medicaid in order to work.

- **Student earned income exclusion** – For students under age 22 who are regularly attending school and neither married nor the head of a household, up to $1,340 of earned income per month, to a maximum of $5,410 per year, is excluded from countable income.

- **Work expenses of the blind** – Any income earned by a blind individual that is used to meet expenses needed to earn that income is excluded from countable income.

- **Plan for achieving self-support (PASS)** – A PASS allows a disabled or blind individual to set aside income and resources to get a specific type of job or to start a business. The income and resources that are set aside are excluded under the SSI income and resource tests.

- **Expedited reinstatement of benefits** – There is a 60-month period in which a former beneficiary may request reinstatement of benefits without filing a new application.

- **Impairment-related work expense exclusion** – The cost of certain impairment-related services and items that a beneficiary needs in order to work are excluded from countable income for SSI purposes and are deducted from earnings when determining if work is substantial.

- **Continued payment under a vocational rehabilitation program** – Beneficiaries who medically recover while participating in a vocational rehabilitation program that is likely to lead to becoming self-supporting may continue to receive benefits until the program ends.

While SSI work incentives can be complex, beneficiaries’ decisions about working are much more complex, due to the interactions of multiple means-tested programs from which they may be receiving benefits. SSI beneficiaries face potential reductions of benefits not only from SSI but also from any other transfer programs, plus the regular assortment of federal, state, and local taxes, as well as the potential loss of medical insurance. This combination is equivalent to a high cumulative marginal tax rates for individuals receiving benefits from multiple programs. A 1996 article computed that the rate of income reduction for an additional dollar earned could be as high 89 cents for an SSI recipient who also qualifies for the Earned Income Tax Credit and Food Stamps.
Given the complexity of the work incentives involved, it is impossible to predict what
the effect and the costs would be of increasing the 1972 income disregards. SSA is
currently conducting a demonstration project that should shed some additional light on
these questions. Known as Work Incentives for Participants in the Florida Freedom
Initiative, it began in March 2004 and will end by March 2007. As part of this
demonstration, SSI beneficiaries who participate will have an earned income disregard of
$280 (four times the current law disregard). Work incentives are an important aspect of
updating the SSI disability program, and we look forward to learning the results of this
demonstration project. Increasing work incentives would be expensive, but if it is done
in the context of a larger reform of the program, including living arrangements and in-
kind support (as discussed later in this statement) and potentially other simplifications,
there might be sufficient savings to offset the additional costs.

WAGE REPORTING

In some of our previous statements on the SSI program, we discussed wage
reporting as it related to program integrity and the administrative aspects of
overpayments. We now want to focus on wage reporting and overpayments as an
obstacle to increasing the amount of work by SSI beneficiaries.

Wage reporting has been a perennial problem for the SSI program. Earnings above
$65 per month can affect beneficiaries’ payments. For children and for beneficiaries with
ineligible spouses, a portion of the parents’ or spouses’ earnings are deemed to be
available to the beneficiary, affecting payment amounts. SSA quality reviews have found
wages to be a leading cause of SSI overpayments for over a decade.

SSI payments are computed using a system known as “retrospective monthly
accounting.” This means that they are based on known circumstances for a past month.
Payments are computed for each month, and the payment for a month is usually based on
the beneficiary’s countable income (including deemed income) from the second month
before the current month. If earnings are reported promptly and recorded in a timely and
accurate manner, they should not result in overpayments. For example, the payment that
is made at the beginning of June is generally based on the income for April. If the
beneficiary has an increase or decrease in his income in April, he or she can report it at
the start of May and should receive the correct payment in June.

Retrospective accounting may make it easier for the agency to administer the
program, but it does not serve the best interests of beneficiaries who live at or near the
poverty level and are concerned with meeting their current needs. Retrospective
accounting makes budget planning difficult for beneficiaries even if all the payments are
accurate. Take the case of a beneficiary who goes to work in April and, quite correctly,
receives a full payment in April. He has some extra money, which he is likely to spend to
meet his current needs. But if he is not working in June, he not only does not have
wages, he also gets a smaller benefit and may be unable to meet his needs. In the balance
of this statement, we will address the current system, but we recommend that SSA
consider replacing retrospective accounting with a system that better serves the needs of beneficiaries.

SSA directs all SSI beneficiaries and their representative payees to report when the beneficiary (or parent or ineligible spouse) starts working or stops working or when the amount of monthly wages changes. However, this is frequently not done. We have also often heard credible testimony that some beneficiaries report accurately and timely, but their wages are not recorded accurately or timely. Both failure to report wages and failure to record them can cause overpayments. A representative of the Consortium for Citizens with Disabilities told the Ways and Means Committee, “This is a nightmare to people with extremely low incomes and becomes a major barrier to future work.” A study done for the Ticket to Work Advisory Panel in 2003 reported extensive anecdotal evidence on the work disincentive caused by overpayments and the fear of overpayments. A staff member for an agency that provides legal services to beneficiaries stated that it is common for working beneficiaries who receive an overpayment notice to stop working. Another study done for the Ticket to Work Advisory Panel in 2003 reported, “Stories circulate among beneficiaries of people who have been required to repay excess benefits as much as a year after the overpayments were made, and who do not have the funds to do so. However often or infrequently this happens, the stories persist and offer a serious disincentive to the much larger number of people who hear them and learn to fear being caught in this situation.”

The Commissioner of Social Security discussed this issue at a 2003 hearing of the Social Security Subcommittee of the House Ways and Means Committee. Representative Hayworth said, “One concern of many beneficiaries about returning to work is that if they report their earnings to SSA, the agency may not accurately keep track of them, thus leading to overpayments. This fear of having to repay potentially hundreds or thousands of dollars in overpayments is a real concern that prevents many individuals with disabilities from taking that step to return to work.” Commissioner Barnhart replied, “That has been a huge issue in the agency. Quite frankly, the lag time between individuals willingly reporting income that they are earning and it getting posted into their accounts so we know we need to make adjustments in benefits . . . does result in these erroneous overpayments, sometimes after a year or two, and the individual is required to pay that back through overpayment collection efforts unless we grant a waiver. I would say that the major factor contributing to that delay has been a need for additional resources.”

There are numerous obstacles, besides agency resources, to eliminating overpayments due to earnings. The study for the Ticket to Work Advisory Panel enumerated them: “From SSA’s perspective, complex program rules governing the treatment of earnings, earnings definitions, evidence requirements, monthly accounting, limited automation, . . . diffused responsibility, and competing priorities all contribute to untimely processing of wage information. From the beneficiary perspective, understanding reporting and evidence requirements and work incentive provisions, accurately estimating monthly income, and taking appropriate follow-up actions represent significant challenges to the timely reporting of wage information.”
A small pilot conducted recently by SSA offers a glimmer of hope for at least reducing the incorrect SSI payments caused by wages. Between May and December 2003, some 1,300 volunteers participated in a pilot using a voice recognition/touchtone telephone reporting system. They used the telephone to report wages, and their reports went directly into SSA’s computer system, without any further work by SSA employees. The evaluation of the pilot found that the wage reports made in this way were much more accurate than the wage estimates that were already on SSA’s records. The evaluation estimated that the new system would prevent $200 in annual SSI overpayments and $400 in annual SSI underpayments for every person who reports wages monthly. There would be additional administrative savings from avoiding the work involved in processing wage alerts, overpayments, and underpayments. The total savings would exceed the $2 million to $3 million annual cost of making the system available if only 3,300 to 4,900 beneficiaries and deemors used it. The major hurdle to fully implementing the system is making it simple to use, while still keeping it secure. The pilot used a password authentication system that participants found difficult. Half the volunteers were unable to use it. The 1,300 who used it needed considerable help from their local field office, and 15 percent reported for only one or two months. Field offices involved in the pilot stated that participants who dropped out of the pilot found it too difficult or were afraid that they would make a mistake that would reduce their SSI check.

SSA is committed to a second pilot, in which participants will be able to use knowledge-based authentication, rather than a password system. That pilot is still being planned. We encourage SSA to move ahead quickly. When the system is fully functional, the agency should consider making its use for wage reporting mandatory.

Even if every working SSI beneficiary or deemor reported wages monthly, SSA’s stewardship obligations would require it to verify the amounts that had been reported. In its field visits, the Board has been told that the current wage-verification system is labor-intensive, taking the time of employers, beneficiaries, and SSA staff. It requires beneficiaries or deemors to save all pay stubs for review by SSA staff. This can mean that SSA staff must review up to 52 pay stubs per year (or more for workers with more than one employer) and calculate the exact amount paid each month. (Some offices do this monthly or quarterly, but the amount of work over a year is still the same.) If the worker has not kept the pay stubs, SSA asks the employer to review wage records and report the amount paid per month. The employers’ compliance is voluntary, but most do provide the information.

If a reliable monthly wage reporting system were implemented, it would seem feasible to simplify the verification system to one that would simply compare the sum of the monthly wage reports to the annual report from the employer for tax purposes. If the two matched, within some tolerance to be established, the monthly reports could be accepted as accurate, and no further verification required. An SSA report in 2000 on SSI program simplification estimated that annual wage verification could save more than 800 workyears annually.
In previous reports and testimony, the Board has stressed the need to simplify the SSI program. Some progress has been made in this area. SSA worked with the Congress to include some simplification provisions in the Social Security Protection Act of 2004. These included exclusion from countable income of small amounts of interest and dividends, easing the rules on infrequent unearned income, preventing triple counting of income in some circumstances, and provisions to help military families. SSA has also made some regulatory changes dealing with resources and non-cash income. All of these changes are welcome accomplishments, but much remains to be done.

One of the areas most in need of simplification is the set of rules that apply when an applicant or recipient lives in the household of another or receives other in-kind support. Program rules in this area are difficult to administer, are a leading cause of incorrect payments, raise questions of equity, and make the program more vulnerable to fraud and abuse. The Government Accountability Office has also drawn attention to the need for simplification, stating in 2002: “A fundamental cause of SSI overpayments are the complex rules governing SSI eligibility. However, SSA has done little to make the program less complex and error prone, especially in regard to living arrangement policies. . . . [L]ongstanding SSI payment errors and high administrative costs suggest the need for SSA to move forward in addressing program design issues and devising cost-effective simplification options.”

Living arrangements and in-kind support are major factors in determining the amount of SSI benefits payable to a beneficiary. In-kind support is unearned income in the form of food or shelter that is paid for by someone else. The agency must go through a process of determining these issues in every claim and redetermination. Claims representatives make these determinations by going through a series of questions that is summarized on a two-page flowchart in SSA’s program operations manual. The decision path can lead through a variety of issues, such as home ownership, rental liability, contributions to household expenses, receipt of public assistance by other household members, and separate purchase or consumption of food. Claimants who are found to be living in the household of another and receiving food and shelter from others in the household are subject to the one-third reduction rule, which means that their Federal benefit rate (FBR) is reduced by one-third. For claimants who are not subject to the one-third reduction but who are receiving in-kind support, the value of that support must be determined. The presumed (and maximum) value of in-kind support is one-third of the full FBR plus $20. (This would result in a benefit payment equal to that under the one-third reduction.) But the presumed value can be contested. If claimants can show that the actual value of food and/or shelter that they receive is less, the agency will use the actual value in computing the benefit, resulting in a higher payment.

If the paragraph above sounds complicated, the actual development required by cases is much more complicated. The SSA operating manual has the equivalent of 250 single-spaced typed pages of instructions on living arrangements and in-kind support and seems to try to parse every possible combination and permutation. SSA’s Office of the
Inspector General (OIG) issued an evaluation report in 2001 on these factors. The report stated, “Procedures for determining an individual’s [living arrangements] and the value of [in-kind support] are difficult to administer and can result in SSI claims being improperly developed. These difficulties result from complex and difficult to verify eligibility requirements.” As part of its study, OIG sent a questionnaire to a sample of field offices soliciting their opinions on living-arrangements and in-kind support. The answers reinforce what the Board has been told on its visits to field offices. For example:

- The manual section on in-kind support “is filled with complicated computations for situations that rarely occur.”

- “Like most of the SSI program, a title XVI [claims representative] needs to be a Certified Public Accountant, insurance agent, financial advisor, realtor, lawyer and social worker.”

- “The whole concept is too complicated and gets more so . . . .”

- “The rules are complicated and difficult for [claims representatives] to agree on, let alone for an applicant with limited education and/or faculties to understand.”

Given this complexity, it is not surprising that living arrangements and in-kind support rank high among factors causing incorrect SSI payments. The most recent report on SSI payment accuracy shows that in-kind support ranked third as a factor in overpayments, accounting for $187 million. In-kind support and living arrangements ranked second and third as factors in underpayments, accounting for $93.5 million and $82.5 million, respectively.

SSA’s policies and procedures on living arrangements and in-kind support also leave the program vulnerable to fraud and abuse. The OIG report mentioned above said, “We determined that SSA has no effective method to verify such key factors as household size and composition, rental liability and marital status. As a result, SSI applicants may qualify for benefits or cause payment errors by providing incorrect [living arrangements and in-kind support] information.” Again, responses to OIG’s questionnaire to field offices are in accord with what the Board has heard on its field visits:

- “So much of the information used to make determinations (such as household expenses, separate purchase of food, rental subsidy) is based on allegation and corroboration, which match the allegation, but do not match reality.”

- “The [living arrangements/in-kind support] process is weak because most allegations . . . (such as household expenses, rental subsidy, separate purchase of food, sharing, etc.) are verified using a corroborative statement from someone known to the applicant and who may have a motivation to be less than objective and truthful. There is no practical way to verify these issues.”
• “The [operations manual] criteria are set up in such a way that it begs for individuals to make fraudulent statements. Once an individual is aware of the rules, they know how to answer the questions in order to get a higher benefit.”

• “A legal advocacy group in our area routinely coaches applicants and recipients on how to answer questions so that they will receive the most advantageous [living arrangements].”

• “[T]he public is more educated on what to say. Clearly a lot of applicants have been schooled before coming to us.”

And all the questioning and development, flawed though it may be, in the end has little effect. As of December 2003, only 4.1 percent of SSI beneficiaries had the one-third reduction applied to their benefits, and only another 3.7 percent were charged with in-kind support.

Current policies also raise questions of equity. Other program rules assume that people living together have certain economies of scale and do not require as much for their current living expenses as the same number of people living separately. That is why couples, with both partners receiving SSI, receive a benefit rate equal to 150 percent of the rate for individuals. The same assumption, however, is not applied to non-married-couple SSI recipients who share a household. In fact, in a household composed of SSI recipients who are not married to each other, each is presumed to be sharing household expenses and is eligible for the full individual rate. A recent analysis found that at least one in five SSI beneficiaries lives with at least one other SSI recipient who is not a spouse. The study also found that the prevalence of poverty among married SSI couples is higher than among non-couple SSI beneficiaries living in the same household.

In short, current policy and procedures on living arrangements and in-kind support are not only administratively cumbersome but also contribute significantly to inaccurate payments, cause vulnerability to fraud and abuse, and are part of a system of dubious equity. Programmatic changes always involve trade-offs, but not necessarily in the form of higher costs. Ways to reduce the complexity of the SSI rules for living arrangements and in-kind support have been identified in the past and merit careful consideration.

In December 2000, for example, SSA published *Simplifying the Supplemental Security Income Program: Challenges and Opportunities*, which examined living arrangements and in-kind support, among other aspects of the SSI program. The report outlined six potential methods to simplify the SSI program. All of the methods examined had advantages and disadvantages. The option we find most attractive would eliminate the current rules for living arrangements and in-kind support and would simply reduce benefits by a fixed percentage for adult SSI beneficiaries living with another adult.² It would be possible to develop a cost-neutral option for such reductions.

² The reason for excluding SSI child beneficiaries is that the law currently recognizes parental financial responsibility by deeming parental income to children. In that way, their benefits are already adjusted for the support available from parents.
It might also be possible to shape an option that would provide offsetting savings that would make other program improvements possible. A similar but more substantial change was suggested by one of the participants in the Supplemental Security Income Modernization Project in 1992. That suggestion, by Michael Stern, one of the panel of experts who studied the SSI program, would establish a payment level for any SSI recipient living with another adult at the rate of 75 percent of the payment for an individual living alone. (This would be equal to the rate paid to a member of an SSI couple.) Reductions for in-kind support would be eliminated. Current beneficiaries would have their benefit levels protected. There are no current estimates of savings from implementing this proposal. The original Stern proposal would use the savings (then estimated at $5 billion over five years) to increase staffing levels and to increase the overall level of SSI benefits, increasing them toward the Federal poverty level. Instead of doing that, it would be possible to use savings toward making other program improvements possible, such as increasing work incentives, as discussed above in this statement.

Making such a change as recommended by either option is not a simple matter and would require legislative change by Congress. If it were simple, it would have been done long ago. Some beneficiaries (those now charged with in-kind support) would have their benefits increased, but more (non-couple beneficiaries now sharing living quarters) would have them reduced. On the other hand, those who would gain would most likely be those in greater need. SSI beneficiaries who live alone are more likely to be in poverty than those who live with others. It would be possible to design methods to ease the transition for those whose benefits would be reduced, for example by making reductions effective only for new claims or for new claims and for current beneficiaries whose living arrangements change. To simply achieve cost-neutrality, the proposal could be designed to have a quite modest impact on new beneficiaries. A larger impact would be necessary if the change were to also generate savings that could be used to finance improvements in other aspects of the program, such as work incentives.

We encourage SSA to continue its study of simplifying rules for living arrangements and in-kind support and to further examine the distributive effects of making such a change. We believe that this is an area that deserves congressional attention. Replacing current rules with an approach that is much simpler would enhance payment accuracy, improve program integrity, increase equity among beneficiaries, reduce administrative burdens, and make the program easier for beneficiaries to understand.

Hal Daub  
Chairman

Dorcas R. Hardy  Martha Keys

David Podoff  Sylvester J. Schieber


**Members of the Board**

*Hal Daub, Chairman*

Hal Daub is currently a partner in the law firm of Blackwell Sanders Peper Martin in Omaha, Nebraska and Washington, D.C. Previously, he was President and Chief Executive Officer of the American Health Care Association and the National Center for Assisted Living. He served as Mayor of Omaha, Nebraska from 1995 to 2001, and was an attorney, principal, and international trade specialist with the accounting firm of Deloitte & Touche from 1989 to 1994. Mr. Daub was elected to the U.S. Congress in 1980, and reelected in 1982, 1984, and 1986. While there he served on the House Ways and Means Committee, the Public Works and Transportation Committee, and the Small Business Committee. In 1992, Mr. Daub was appointed by President George H.W. Bush to the National Advisory Council on the Public Service. From 1997 to 1999, he served on the Board of Directors of the National League of Cities, and from 1999 to 2001, he served on the League’s Advisory Council. He was also elected to serve on the Advisory Board of the U.S. Conference of Mayors, serving a term from 1999 to 2001. From 1971 to 1980, Mr. Daub was vice president and general counsel of Standard Chemical Manufacturing Company, an Omaha-based livestock feed and supply firm. A former U.S. Army Infantry Captain, he is a Distinguished Eagle Scout, 33rd Degree Mason, active in the Salvation Army, Optimists International, and many other charitable and philanthropic organizations. He is the current chairman-elect of the Community Health Charities of America. Mr. Daub is a graduate of Washington University in St. Louis, Missouri, and received his law degree from the University of Nebraska. Term of office: January 2002 to September 2006.

*Bradley Belt*³

Mr. Belt is currently Executive Director of the Pension Benefit Guaranty Corporation. Previously, Mr. Belt was President the Washington Capital Group, Inc., a consulting firm to corporations, financial institutions, and non-profit organizations on policy matters and business strategy. He has held senior management and staff positions in both the public and private sectors. His prior private sector roles include serving as a member of the executive management team of FOLIOfn, a financial services and technology company that was named by *Red Herring* magazine as one of the 50 private companies "most likely to change the world," and Managing Director of The Commonwealth Group, a government relations consulting firm. Mr. Belt also has held a number of senior government posts with the U.S. Congress and the Securities and Exchange Commission (SEC). He served as Senior Vice President for Policy at the Center for Strategic and International Studies (CSIS), a prominent Washington-based think tank where he was responsible for program management, policy planning, and corporate development. He also served as executive director of the National Commission on Retirement Policy. Mr. Belt completed the senior executive fellows program at the Kennedy School of Government at Harvard University, received his law degree from the Georgetown University Law Center, and obtained his undergraduate degree in business administration from the University of Nebraska.

³ Mr. Belt resigned as a member of the Social Security Advisory Board on April 23, 2004 upon appointment as Executive Director of the Pension Benefit Guaranty Corporation.
**Dorcas R. Hardy**

Dorcas R. Hardy is President of DRHardy & Associates, a government relations and public policy firm serving a diverse portfolio of clients. After her appointment as Assistant Secretary of Human Development Services, Ms. Hardy served as Commissioner of Social Security from 1986 to 1989 and was recently appointed by President Bush to chair the Policy Committee for the 2005 White House Conference on Aging. Ms. Hardy has launched and hosted her own primetime, weekly television program, “Financing Your Future,” on Financial News Network and UPI Broadcasting and “The Senior American,” an NET political program for older Americans. She speaks and writes widely about domestic and international retirement financing issues and entitlement program reforms and is the author of *Social Insecurity: The Crisis in America’s Social Security System and How to Plan Now for Your Own Financial Survival*, Random House, 1992. Ms. Hardy consults with seniors’ organizations, public policy groups, and businesses to promote redesign and modernization of the Social Security, Medicare and disability insurance systems. Additionally, she has chaired a Task Force to rebuild vocational rehabilitation services for disabled veterans for the Department of Veterans Affairs. She received her B.A. from Connecticut College, her M.B.A. from Pepperdine University and completed the Executive Program in Health Policy and Financial Management at Harvard University. She is a Certified Senior Advisor and serves on the Board of Directors of The Options Clearing Corporation, Wright Investors Service Managed Funds, and First Coast Service Options. First term of office: April 2002 to September 2004. Current term of office: October 2004 to September 2010.

**Martha Keys**

Martha Keys served as a U.S. Representative in the 94th and 95th Congresses. She was a member of the House Ways and Means Committee and its Subcommittees on Health and Public Assistance and Unemployment Compensation. Ms. Keys also served on the Select Committee on Welfare Reform. She served in the executive branch as Special Advisor to the Secretary of Health, Education, and Welfare and as Assistant Secretary of Education. She was a member of the 1983 National Commission (Greenspan) on Social Security Reform. Martha Keys is currently consulting on public policy issues. She has held executive positions in the non-profit sector, lectured widely on public policy at universities, and served on the National Council on Aging and other Boards. Ms. Keys is the author of *Planning for Retirement: Everywoman’s Legal Guide*. First term of office: November 1994 to September 1999. Current term of office: October 1999 to September 2005.

**David Podoff**

David Podoff was a senior advisor to the late Senator Daniel Patrick Moynihan on Social Security and other issues while serving as Minority Staff Director and Chief Economist for the Senate Committee on Finance. While on the Committee staff he was involved in major legislative debates with respect to the long-term solvency of Social Security, health care reform, the constitutional amendment to balance the budget, the debt ceiling, plans to balance the budget, and the accuracy of inflation measures and other government statistics. Prior to serving with the Finance Committee he was a Senior Economist with the Joint Economic Committee and directed various research units in the Social Security Administration’s Office of Research and Statistics. He has taught
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Gerald M. Shea is currently assistant to the president for Government Affairs at the AFL-CIO. He previously held several positions within the AFL-CIO, serving as the director of the policy office with responsibility for health care and pensions, and also in various executive staff positions. Before joining the AFL-CIO, Mr. Shea spent 21 years with the Service Employees International Union as an organizer and local union official in Massachusetts and later on the national union’s staff. He was a member of the 1994-1996 Advisory Council on Social Security. Mr. Shea serves as a public representative on the Joint Commission on the Accreditation of Health Care Organizations, is a founding Board member of the Foundation for Accountability, Chair of the RxHealth Value Project, and is on the Board of the Forum for Health Care Quality and Measurement. He is a graduate of Boston College. First term of office: January 1996 to September 1997. Second term of office: October 2000 to September 2004.