

# ISSUE BRIEF



## Recent Developments in the Social Security Administration's Representative Payee Program

June 2019

### Basics

The *Social Security Act Amendments of 1939* authorized the Social Security Administration (SSA) to use a representative payee to receive benefit payments on behalf of a beneficiary or recipient when it is in the interest of the beneficiary or recipient. A payee may be a person or organization that is required to determine the needs of the beneficiary or recipient and use the individual's payments to meet those needs. SSA performs three main functions regarding payees: the agency decides whether a beneficiary or adult Supplemental Security Income (SSI) recipient needs a payee, selects a suitable payee to meet the beneficiary or recipient's needs and provides oversight of the payee.



### Introduction

One of the most important activities of SSA is the designation and monitoring of representative payees ("payees"). SSA has found more than 8 million beneficiaries and recipients to be incapable of managing or directing the management of funds paid to them by SSA. For years, the Social Security Advisory Board ("Board") heard concerns about the payee program; so, after releasing a call-to-action in 2016 and holding a public forum in 2017,

the Board released an in-depth review in January 2018, pressing for more analysis and providing recommendations to Congress, SSA and the Office of Management and Budget for improvements.<sup>1</sup> This brief summarizes recent developments with respect to representative payees, including the April 2018 legislation, the *Strengthening Protections for Social Security Beneficiaries Act of 2018*,<sup>2</sup> highlights major concerns addressed at the Board's September 2018 policy forum and in its January 2019 comment in the *Federal Register*, and reports

1 Social Security Advisory Board, *Statement on the Supplemental Security Income Program*, May 2010; Social Security Advisory Board, *Representative Payees: A Call to Action*, March 2016; Social Security Advisory Board, *Joining Forces to Improve the Representative Payee Program*, policy forum, March 27, 2017; Social Security Advisory Board, *Improving Social Security's Representative Payee Program*, January 2018.

2 The *Strengthening Protections for Social Security Beneficiaries Act of 2018*, Public Law No. 115-165.

on ongoing Board work and continued concerns about the program.<sup>3</sup>

## Numbers

At the end of December 2017, 5.8 million payees managed 5.8 billion dollars a month for 8.1 million beneficiaries and recipients. About 5.7 percent of adult beneficiaries and recipients across SSA's programs have payees. Of those individuals with payees, 40 percent received Supplemental Security Income payments; 53 percent were minor children, and 54 percent had a disability.<sup>4</sup>

## Recent legislation

In April 2018, the *Strengthening Protections for Social Security Beneficiaries Act of 2018* became law.<sup>5</sup> The bill sought to strengthen oversight and beneficiary protections while improving payee quality. The first section of the bill moved the responsibility for on-site monitoring payees to state protection and advocacy agencies; reduced the paperwork burden on most families by eliminating the requirement to produce annual accounting reports for payees who are the parent of the beneficiary or recipient; and directed SSA to execute data exchange agreements with state foster care systems in order to track minor children receiving Social Security and SSI benefits. The second section of the bill provided beneficiaries and recipients with the option to designate a payee for themselves if and when they might have need of one; codified SSA's policy that barred individuals from serving as a payee if they had certain felonies or had a payee themselves; and directed a reassessment of payee selection and replacement policies.

Following the legislation, the Board has continued to hear from stakeholders about problems with the program, including inconsistencies in administering rules across field offices and a lack of communication between SSA and stakeholders at the local, regional and national levels.

## Themes from a Board policy forum

On September 7, 2018, the Board convened over a hundred policymakers, researchers, agency administrators, and payees to explore how payee administration might be further improved. The forum informed SSA's reassessment of the payee selection process by showcasing legislative intent, raising front-line perspectives of payees and arguing for an empirically-based approach (see Appendix 1 for forum agenda). Themes developed from the forum are described below.<sup>6</sup>

## Challenges to achieving administrative consistency in the payee program

The payee program is difficult to administer because the population needing payees is diverse and growing. This group contains both children and adults across SSA's programs, which include Old-Age, Survivors, and Disability Insurance (i.e., Social Security), and Supplemental Security Income. This group also includes people with mental illnesses, developmental disabilities, addiction, and dementia. The number of people in their 80s and older, when cognitive and physical impairments may increase the need for assistance in managing personal affairs, is growing fast.<sup>7</sup> The number of "orphan" elders—people who do not have someone they can rely on to help them—is also on the rise.<sup>8</sup> These trends are increasing

3 Social Security Advisory Board, *Moving Forward—Implementing Changes in the Representative Payee Program*, policy forum, September 7, 2018; Letter from Kim Hildred, Chair, Social Security Advisory Board to Nancy Berryhill, Acting Commissioner, Social Security Administration, *Re: Notice and Comment on Review and Reassessment of the SSA's Representative Payee Selection and Replacement Policies*, 83 Fed. Reg. 64422 (December 14, 2018), January 28, 2019.

4 By request: Office of Retirement and Disability Policy, September 2018.

5 The *Strengthening Protections for Social Security Beneficiaries Act of 2018*, Public Law No. 115–165.

6 The Board sponsored and organized the day-long discussion with input from SSA; however, the ideas expressed at the forum do not necessarily reflect the opinions of the Board, or any individual, nor SSA.

7 Social Security Advisory Board, *Representative Payee Chart Collection*, Charts 10, 11 and 12, January 2018.

8 As the baby boom generation ages and becomes more likely to be financially incapable, this generation also becomes more likely to be divorced and less likely to have as many children as compared to previous generations.

the number of complex cases and will challenge administration.

Organizational payees gave many examples of inconsistent administration across and sometimes within field offices. Panelists offered various recommendations to address inconsistencies, including better communication about beneficiaries and recipients with a history of exploitation in the selection process and a more streamlined fee-for-service approval process. One attendee called for the creation of a working group, so the agency can design a clear policy that it can administer consistently, particularly for those beneficiaries without a trusted individual. Panelists also raised concern over creditor payees and discussed alternatives to their appointment.<sup>9</sup>

SSA uses established preference lists to guide the development of payee selection and replacement (see Appendix 2 for preference lists).<sup>10</sup> Organizational payees, which are near or at the bottom of the preference lists, argued that the payee appointments can vary widely from field office to field office. Panelists stressed that these preference lists in practice do not address instances where family members are not the best option for payees. Sometimes family members are unable or unwilling to serve as the payee; at other times, willing family members may be exploitive. In either case, family members may not be good payees. Organizational payees suggested that SSA policy further clarify that beneficiaries with trusted individuals are fundamentally different from those who lack any suitable family member or friend with a demonstrated concern. Often, these organizations become the payee after a

community partner, such as a social services or adult protective services agency, refers the client because of concerns about their well-being.

A panelist suggested that SSA consider implementing a flag in its electronic client records to identify victims of exploitation so that susceptibility is considered in the selection (or often, replacement) decision. Organizational payees reported that they—and the local referring agency—are sometimes not contacted when SSA is considering replacing them as payee, often to the detriment of the beneficiary or recipient. Payees called for more communication with the payee of record and the point of referral in the community. A panelist argued that SSA's concern about beneficiaries' privacy and confidentiality should not bar the agency from soliciting appropriate evidence of who would best serve an individual's interests.

Panelists discussed two types of organizational payees: fee-for-service (FFS) payees and creditor payees. Each field office approves organizational payees to collect a \$42 monthly fee for services rendered in their jurisdiction.<sup>11</sup> Fees are deducted from the funds available to beneficiaries and recipients. FFS organizational payees asked for clarification in the approval rules, including SSA's definition of "community-based."<sup>12</sup> These payees argued that in areas that lack other options, their collaboration with referring community organizations and the use of phone and email would allow them to assure that they meet their clients' needs remotely. FFS organizational payees also asked for a more centralized fee approval process above the field office, which the Board recommended in its 2018 report. These payees argued that the

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9 SSA defines a creditor payee as an individual or organization provides the beneficiary with goods or services for monetary consideration. SSA POMS [GN 00502.135 Payee Applicant is a Creditor](#) (June 2017).

10 SSA Program Operations Manual System [GN 00502.105—Payee Preference Lists \(June 2017\)](#) outlines preferred payee candidates in the preferred order of selection for adults, minor children and beneficiaries with a substance abuse condition. The lists however are meant as a developmental guide and are not a substitute for full payee development. In 2018, the Board recommended that SSA research and evaluate these preference lists. See also: Sections 205(j) and 1631(a)(2) of the *Social Security Act*; 20 CFR § 404.2021 (2004); 20 CFR 416.621 (2004).

11 Non-governmental agencies must be community based, tax exempt under section 501(c) of the Internal Revenue Code, and be bonded and licensed, according to State guidelines. Further, organizations must regularly serve as payee for at least five beneficiaries, and generally, not be a creditor of the beneficiary. See: SSA Program Operations Manual System [GN 00506.100 Criteria for Receiving FFS](#) (March 2005).

12 SSA defines "community-based" as an organization "located in the neighborhood(s), city (ies), and/or county (ies) which it serves" and outlines that organizations should submit a description of the agency's service area when being considered to collect a fee. See: SSA POMS [GN 00506.100 Criteria for Receiving FFS](#) (March 2005).

field office decision to approve an organization to collect a fee has been combined, inappropriately, with the decision to select that organization as the payee.

Panelists also raised concerns with creditor payees due to their having an inherent conflict of interest. The panelists offered recommendations to increase oversight and decrease the use of creditor payees that, in addition to payee services, provide the beneficiary with goods or services for monetary consideration.<sup>13</sup> SSA doesn't generally appoint creditors, but makes exceptions, including facilities that are licensed or certified as a state care facility.<sup>14</sup> Panelists suggested that SSA begin to systematically track current creditor payees, something that the agency does not do. Then, once SSA identifies those creditor payees, panelists recommended that, at a minimum, creditor payees be subject to the same oversight as FFS organizational payees.

Panelists also proposed that SSA minimize appointment of creditor payees in place of suitable alternatives. If no suitable individual is willing, then the field office employee must find an organizational payee. A panelist and an attendee suggested changes to the funding of payee services so that the frontline employee does not have to choose between appointing a creditor payee and a FFS payee, since the \$42 monthly fee can create a hardship for those who often have very limited resources. Finally, forum participants suggested SSA develop an accreditation process for organizational payees. This process would establish standards for staffing, training, insurance, and accounting systems. An attendee noted that this process might encourage many community-based case management organizations to enter the

service market and expand non-creditor options for beneficiaries and recipients.

## Opportunities to inform evidence-based program changes

As the momentum for evidence-based policymaking grows across the Federal government, panelists stressed the importance of making empirically-based changes.<sup>15</sup> Panelists stated that the public data and research on payees are inadequate and expressed doubts about whether SSA internally collects appropriate administrative data on payees. Panelists proposed that SSA leverage a new payee monitoring program to generate evidence to strengthen its predictive models and selection guidance. Finally, panelists offered recommendations to improve the agency's capacity to generate and use evidence: namely, learning agendas to outline research roadmaps and chief evaluation officers to ensure that evidence is generated to answer these questions.

Multiple panelists criticized as inadequate the public data and research on an activity as important as the designation and oversight of payees. In the last twenty years, only one article on payees has been published in the *Social Security Bulletin*.<sup>16</sup> The *Annual Statistical Supplement* has only two tables that show the percent of beneficiaries with a payee by age and benefit type.<sup>17</sup> A moderator pointed out that besides the payee's relationship or type, there are no publicly-available data on characteristics of payees. While some anecdotal data are published, panelists agreed that there are opportunities to provide better disclosure on payee performance by improving the annual monitoring report.<sup>18</sup>

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13 SSA POMS GN 00502.135 *Payee Applicant is a Creditor* (June 2017). See also: Kate Lang and Catherine Bourque, "Skilled Nursing Facilities and Other Creditors Acting as Representative Payees," January 2018.

14 Sections 205(j)(2)(C) and 1631(a)(2)(B) of the Social Security Act; 42 U.S.C. 405(j)(2)(C) and 1638(a)(2)(B).

15 Commission on Evidence-based Policymaking, *The Promise of Evidence-Based Policymaking*, September 2017; *The Foundations for Evidence-Based Policymaking Act of 2018*, Public Law No. 115-435.

16 Anguelov, Chris E., Gabriella Ravida, and Robert R. Weathers II, "Adult OASDI Beneficiaries and SSI Recipients Who Need Representative Payees: Projections for 2025 and 2035," *Social Security Bulletin*, Vol. 75, No. 2, 2015.

17 SSA, *Annual Statistical Supplement to the Social Security Bulletin, 2017, Tables 5.L1 (OASDI) and 7.E4 (SSI)*.

18 SSA, *Annual Report on the Results of Periodic Representative Payee Site Reviews and Other Reviews for Fiscal Year 2017*, January 26, 2018.

Panelists argued that it is difficult to examine potential payee policy issues without sufficient data. Evaluation is challenged by a lack of basic descriptive statistics around scope, scale, and changes over time, so policy changes are less informed. A panelist recommended that SSA release and maintain a publicly-available inventory on the data that the agency collects.

Panelists suggested that SSA formalize the collection of payee performance data in the new monitoring program with each state and territory's protection and advocacy system organization, which are comprised of trained disability advocates.<sup>19</sup> Panelists stressed that, if done correctly, these reviews could build a fact-based understanding of payee characteristics and the relative performance of various classes of payees. This understanding could inform changes to the agency's guidance on payee selection and its predictive models for payee misuse.<sup>20</sup>

Panelists argued that government data should be gathered deliberately to analyze important questions. There was general agreement among panelists that SSA has the opportunity today to leverage its new monitoring regime to generate such evidence, but the agency must invest in evidence-building to effectuate such action. Panelists offered two institutional changes to bolster the culture of learning at the agency. The appointment of a chief evaluation officer would help create an agency culture that values the development of a learning agenda. They recommended that SSA develop program learning agendas that would acknowledge the core questions that exist that the agency does not have the data to answer. Finally, they acknowledged that above all, a commissioner committed to an agency culture that values evidence is needed.

## Ongoing concerns and work of the Board

Since the September 2018 forum, the Board has continued to engage with stakeholders and follow the implementation of the *Strengthening Protections of Social Security Beneficiaries Act of 2018*. The Board continues to believe that evidence is not being used to inform policy changes, that implementation of the new payee monitoring process is poor, and that communication between SSA leadership and the broader public on this important work remains inadequate. The Board remains committed to monitor the payee program and to communicate the need for such improvements to SSA, Congress, and the president.

The September 2018 policy forum drew attention to the need for evidence on payees as well as SSA's lack of public data. In response to those comments, the Board has funded a year-long study to document how SSA employees select payees for adult beneficiaries and to evaluate whether those practices are sufficient. Study results are set to be released in fall 2019.

In response to a *Federal Register* notice on SSA's payee selection and replacement processes, the Board in January 2019 wrote to the acting SSA commissioner calling upon the agency to collect and release data on the effects of SSA's preference lists and predictive models.<sup>21</sup> The Board pointed to the lack of research on preference ordering, raised concerns about the data that SSA does—and does not—collect, and recommended that SSA strengthen its data collection to better inform agency decisions. Specifically, the Board described how a new computer tool could have been better used to document payee reviews and generate a dataset on payee performance.

Unfortunately, a missed opportunity with the computer tool was not the only problem in the

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19 These agencies are congressionally-mandated, legally-based disability rights agencies that have the authority to provide legal representation and other advocacy services to people with disabilities.

20 In its 2018 report, the Board recommended that these models be periodically examined and judged by experts outside SSA with findings presented to Congress.

21 Letter from Kim Hildred, Chair, Social Security Advisory Board to Nancy Berryhill, Acting Commissioner, Social Security Administration, *Re: Notice and Comment on Review and Reassessment of the SSA's Representative Payee Selection and Replacement Policies*, 83 Fed. Reg. 64422 (December 14, 2018), January 28, 2019.

roll-out of a new protection and advocacy monitoring effort. The completion of 5,000 reviews was dilatory—issuance of laptops, processing of security clearances, and development and use of the new computer tool dragged on for months.<sup>22</sup> To assure that the data are useful for research, it is imperative that SSA effectively collect the right data and that it is in a structured format. It is unclear whether the savings from elimination of the annual accounting form have been used to expand high-quality reviews to all payees, as Congress intended.<sup>23</sup>

Finally, the Board recognizes that varied stakeholders—including payees, advocates, researchers, and the public itself—have experienced difficulty in communicating with SSA. While SSA field office employees are fully committed to successfully administering the program and communicating with the public, many individuals and organizations

find it difficult or impossible to speak with the appropriate offices or individuals. As the Board recommended in its 2018 report, some field office procedures should be centralized; others require specialized expertise at the field office level. Many inconsistencies result from ‘siloing’ within the agency, which hinders coordination across its operating divisions, including the Office of Operations, Office of Retirement and Disability Policy, Office of Systems and the Office of Analytics, Review and Oversight. Additional coordination on payee issues within headquarters is needed to design and administer this important program effectively.

As SSA continues to work towards the requirements outlined in the *Strengthening Protections for Social Security Beneficiaries Act of 2018*, the Board remains committed to supporting improvements through interactions with the public, SSA, policymakers and the broader research community. ■

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22 Social Security Advisory Board, *Board Meeting Minutes*, January 23–24, 2019, par. 3.

23 House Committee on Ways and Means, “*Legislative History and Technical Explanation of H.R. 4547, The Strengthening Protections for Social Security Beneficiaries Act of 2018.*”

## Appendix 1: Forum agenda

### Moving Forward -

### Implementing Changes in the Representative Payee Program

Friday, September 7, 2018 | HVC-201 AB



**8:45 am Registration**

**9:15 am Welcome Remarks**

- **Kim Hildred**, Chair, Social Security Advisory Board

**9:30 am Panel I: Historical and Legislative Overview of the Representative Payee Program**

- **Kathryn Olson**, Minority Staff Director, Subcommittee on Social Security, House Committee on Ways and Means
- **Amy Shuart**, Majority Staff Director, Subcommittee on Social Security, House Committee on Ways and Means
- **Lanhee J. Chen, PhD**, Member, Social Security Advisory Board (*moderator*)

**10:15 am Administration Remarks**

- **Mark J. Warshawsky, PhD**, Deputy Commissioner, Office of Retirement and Disability Policy, Social Security Administration

**10:30 am Break**

**10:45 am Panel II: Exploring Different Experiences: Representative Payee Order of Preference in the Selection and Replacement Process**

- **Miatta Edi-Osagie**, Administrator, River Terrace Rehabilitation and Healthcare Service, Marquis Health Services
- **Jennifer Flynn**, Senior Director, CrissCross Representative Payee Services, Money Management International
- **Jerry Hynes**, Vice President of Payee Services, Skills'kin
- **Kate Lang**, Senior Staff Attorney, Justice in Aging
- **Christy Respress, MSW**, Executive Director, Pathways to Housing DC
- **Kim Hildred**, Chair, Social Security Advisory Board (*moderator*)

**12:15 pm Lunch Break**

**1:30 pm Panel III: Evidence-Based Approaches to Representative Payee Policy**

- **Nick Hart, PhD**, Director, Evidence-Based Policymaking Initiative, Bipartisan Policy Center
- **James J. Klein**, San Francisco Audit Division Director, Office of the Inspector General, Social Security Administration
- **Peri Jude Radevic**, Chief Executive Officer, Disability Rights Pennsylvania
- **Pamela B. Teaster, PhD**, Professor and Director, Center for Gerontology, Virginia Tech
- **Henry Aaron, PhD**, Member, Social Security Advisory Board (*moderator*)

**3:00 pm Closing Remarks**

- **Bernadette Franks-Ongoy**, Member, Social Security Advisory Board

Source: Social Security Advisory Board, [Moving Forward – Implementing Changes in the Representative Payee Program, policy forum](#), September 7, 2018.

## Appendix 2: Payee preference lists

Preference for adults	Preference for children	Alternative preferences
1. Legal guardian, spouse (or other relative) with custody or who shows strong concern.	1. Natural or adoptive parent with custody or a guardian.	1. Legal guardian with custody or who shows strong concern for the beneficiary well-being.
2. Friend with custody or shows strong concern for the welfare of the beneficiary.	2. Natural or adoptive parent without custody, but who contributes to support and shows a strong concern for the welfare of the beneficiary.	2. Relative or friend with custody who shows strong concern for the beneficiary's well-being.
3. Public or nonprofit agency or institution with custody.	3. A natural or adoptive parent who does not have custody of the beneficiary and is not contributing toward his or her support but is demonstrating strong concern for the beneficiary's well-being.	3. Public or nonprofit agency or institution with custody.
4. Private institution for profit and licensed under State law, which has custody of the beneficiary.	4. Relative or stepparent with custody.	4. Private, for-profit institution with custody and is licensed under State law.
5. Persons other than above who are qualified to carry out the responsibilities of a payee and who are able and willing to serve as a payee.	5. Relative without custody but who is contributing toward the beneficiary's support and shows strong concern for beneficiary's well-being.	5. Anyone not listed above who is qualified, willing and able to act as the payee.
	6. Relative or close friend who doesn't have custody but shows concern.	
	7. Authorized social agency or custodial institution.	

## Appendix 3: Federal Register comment



# Social Security Advisory Board

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Kim Hildred, Chair  
Henry J. Aaron  
Bob Joondeph  
Jagadeesh Gokhale  
Nancy J. Altman

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Claire Green, Staff Director

January 28, 2019

Nancy Berryhill  
Acting Commissioner  
Social Security Administration  
6401 Security Boulevard  
Baltimore, Maryland 21235

**Re: Notice and Request for Comments on “Review and Reassessment of the SSA’s Representative Payee Selection and Replacement Policies, 83 Fed. Reg. 64422 (December 14, 2018), Docket No. SSA-2018-0048**

Dear Acting Commissioner Nancy Berryhill:

The Social Security Advisory Board – a bipartisan, independent federal agency that advises the president, Congress and Commissioner of Social Security – has a long history of examining and making recommendations to improve the representative payee program. Following its 2016 *Call to Action* report, in 2018, the Board recommended that SSA “research and evaluate the order of preference for payee selection.” Soon after, Congress enacted the *Strengthening Protections for Social Security Beneficiaries Act of 2018* (P.L. 115-165); Section 204 requires the Commissioner to conduct a review and reassessment of how payees are selected and replaced. The Board now offers the following public comments in response to SSA’s request in the Federal Register.

As the population is aging, family size is shrinking, and family structure is changing, current payee preference lists may well have become outdated – these lists have been largely unchanged since at least the 1960s. The Board is aware of no empirical research on what preference ordering would be optimal. The Board appreciates that the agency has begun to articulate necessary questions to aid this examination. These questions include: Is the current order of preference appropriate? Should creditor status be incorporated in the preference lists? Does the agency effectively determine when to change a payee that has a higher order of preference to a payee that has a lower preference? And, is there any evidence of difficulty in finding suitable payees over time or in various circumstances? Such questions form a basis for an agency learning agenda on the payee program.

In addition to public response on the structure of payee preference lists, answers to the questions proposed in this request should be informed by agency data. Momentum for evidence-based policymaking is building across the federal government. This month, the *Foundations for Evidence-*

## Appendix 3: Continued

*Based Policymaking Act of 2018* was signed into law. The bipartisan Commission on Evidence-based Policymaking envisioned a future where rigorous evidence is created efficiently as a routine part of government operations and used to construct effective public policy. The Board believes this goal is plausible – particularly when addressing questions about the payee program like those mentioned above.

As noted in the request for comment, SSA considers the individual applicant’s relationship to the beneficiary and the type of organization in setting the order of selection in the preference lists. However, SSA captures payee-related data that, while similar, do not match the sequence of categories specified on the preference lists. Therefore, it is difficult to associate payee performance with payee types on the preference lists – a necessary first step in an assessment of existing payee selection policies.

In addition, the preference lists do not incorporate creditor status (although SSA policy outlines when creditor applicants can be appointed or appointed conditionally). At a September 2018 forum hosted by the Board, panelist and attendee feedback indicated that SSA does not track the creditor status of payees. This raises the question of how SSA would determine whether it should incorporate creditor status into its preference lists when it does not know which payees are creditors.

A reasoned analysis would look at the performance of payees through monitoring on the “back-end” to inform the selection of payees on the “front-end.” The Board is concerned that SSA is missing an opportunity to collect needed data during its annual monitoring of payees. Section 101 of the *Strengthening Protections for Social Security Beneficiaries Act of 2018* established a new program with each state’s Protection & Advocacy system organization conducting onsite reviews of individual and organizational payees. SSA created a new tool to aid that process. Unfortunately, it appears the tool does not generate substantive performance information that could be useful in making changes to the preference lists. A database on payee performance would help SSA improve its predictive models, which it uses to flag potential cases of misuse by payees for additional review and which provide actionable information on how selected payees perform in practice.

If SSA lacks data necessary to answer these key questions, it should move expeditiously to collect it. That means developing electronic systems that can accommodate such information – the electronic Representative Payee System for field office employees who make selection decisions and the new Representative Payee Management Tool for contractors who monitor those payees annually. Consistent with federal initiatives to improve federal evidence-based policymaking, we strongly urge SSA to strengthen its capacity to collect and use all appropriate programmatic data to inform and support decisions about the representative payee program including changes to the selection and replacement process for payees.

Sincerely,



Kim Hildred  
Chair

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Source: Letter from Kim Hildred, Chair, Social Security Advisory Board to Nancy Berryhill, Acting Commissioner, Social Security Administration, *Re: Notice and Comment on ‘Review and Reassessment of the SSA’s Representative Payee Selection and Replacement Policies, 83 Fed. Reg. 64422 (December 14, 2018), January 28, 2019.*

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## Social Security Advisory Board

The Social Security Advisory Board is a bipartisan, independent federal government agency established in 1994 to advise the President, the Congress, and the Commissioner of Social Security on matters of policy and administration of the Old-Age, Survivors, and Disability Insurance and the Supplemental Security Income programs. The seven members of the Board are appointed by the President, the Senate, and the House of Representatives.

Kim Hildred, Chair

Henry J. Aaron • Nancy J. Altman

Jagadeesh Gokhale • Robert Joondeph

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