

Social Security Advisory Board

# 2022 Statement on the Supplemental Security Income Program

July 2022

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## Acronyms

<b>Acronym</b>	<b>Term</b>
ATLAS	Accessing Telehealth through Local Area Stations
FCC	Federal Communications Commission
FY	Fiscal Year
GSA	General Services Administration
POMS	Program Operations Manual System
SSA	Social Security Administration
SSDI	Social Security Disability Insurance
SSI	Supplemental Security Income
UDMIG	Universal Design Mobile Interface Guidelines
VA	Department of Veterans Affairs

Each year, the Social Security Advisory Board (“Board”) members have an opportunity, either individually or jointly, to include their views on the Supplemental Security Income (SSI) program in the Social Security Administration’s (SSA) annual report to the President and Congress.<sup>1</sup> This year’s statement highlights challenges that potentially SSI-eligible older adults—those aged 65 and older—may encounter when using online services. The statement reviews factors important for SSA to consider when designing and implementing a dedicated online SSI application for this population.

## Introduction

In its fiscal year 2023 (FY 23) President’s Budget request, SSA stated that it is “exploring ways to make filing the [SSI] application easier” and has plans to “deliver an application that is user-centered, responsive, intuitive, equitable, easy to use, and accessible online.”<sup>2</sup> There is currently no dedicated online SSI application. While a limited subset of applicants who concurrently file for Social Security Disability Insurance (DI) and meet other eligibility criteria may begin the SSI application process online, many such claims are likely to require follow-up from an SSA employee to collect additional information not captured by the existing online DI tool.<sup>3</sup> In 2022, SSA introduced an online protective filing tool that allows potential SSI claimants to document their intent to file an application and schedule an appointment with SSA to do so.<sup>4</sup>

While the SSI application rate has trended down in recent years, pandemic-related field office closures—when in-person services were unavailable except for dire-need<sup>5</sup> cases—triggered a sharper decline in SSI applications.<sup>6</sup> Whether or not the SSI applications rate returns to or eventually surpasses pre-

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<sup>1</sup> Personal Responsibility and Work Opportunity Reconciliation Act of 1996, [Pub. L. No.104-193 § 213](#); 110 Stat. 2105 (1996).

<sup>2</sup> SSA, [FY 23 President’s Budget](#), March 2022, 21.

<sup>3</sup> A person may be able to file an online SSI application if they are between age 18 and 65; have never been married; are a citizen residing in one of the 50 US states, DC, or the Northern Mariana Islands; have never applied for or received SSI in the past; and are applying for DI at the same time as SSI. SSA, [You May Be Able to Get SSI](#), 2022, 3-4; SSA, Program Operations Manual System (POMS), [SI 01310.600](#), 1999; SSA, POMS, [GN 00502.115](#), 2016; Substance Abuse and Mental Health Services Administration, SSI/SSDI Outreach, Access, and Recovery, [Applicant Self-Help Guide: Completing an SSI/SSDI Application](#), April 2022, 10, 14-15.

<sup>4</sup> Agency Information Collection Activities: New Emergency Request, [87 Fed. Reg. 1111](#) (February 28, 2022).

<sup>5</sup> SSA defines a “dire need” situation as a case where a claimant is without food (and is unable to obtain it), lacks medicine or medical care (and is unable to obtain it) or lacks shelter. SSA, Hearings, Appeals, and Litigation Law Manual, [I-2-1-40](#), 2017.

<sup>6</sup> SSA, [SSI Annual Report 2021](#), October 2021, 4.

pandemic levels,<sup>7</sup> the introduction of a dedicated online SSI application would expand the range of available submission options and allow field office staff to focus on those who need or prefer in-person support.<sup>8</sup> Though the introduction of an online SSI application has the potential to increase convenience and reduce administrative costs, it may also produce unintended administrative burdens for applicants if the development of the online application is not rooted in customer experience and design principles that support diverse functioning among potential applicants.<sup>9</sup>

To that end, the Board offers the following statement on potential challenges facing the SSI-eligible older adult population—those ages 65 and over—in accessing and using online services. To support this population’s use of an online SSI application, SSA must seek to eliminate potential accessibility and usability barriers, including internet access, authentication, privacy and trust concerns, application design, and functionality. We focus on those 65 and older because older adult SSI claims are relatively straightforward to adjudicate compared to claims requiring disability determinations.<sup>10</sup> Unlike SSI disability claimants, who must meet both non-medical eligibility criteria, such as the income and resource limits, *and* provide medical evidence supporting an alleged work-limiting disability,<sup>11</sup> older adults may qualify for SSI based solely on satisfying the non-medical eligibility requirements. Specifically, they must be over age 65, have income and resources under the program limits, and meet other basic eligibility criteria. Recent Board work highlights tradeoffs between

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<sup>7</sup> SSA, [SSI Annual Report 2021](#), October 2021, 4.

<sup>8</sup> Jean-Pierre Aubry and Kevin Wandrei, [“How to Increase Usage of SSA’s Online Tools,”](#) Center for Retirement Research at Boston College, Working Paper 2021-15, November 2021, 5.

<sup>9</sup> Pamela Herd, [“How Administrative Burdens Are Preventing Access to Critical Income Supports for Older Adults: The Case of the Supplemental Nutrition Assistance Program,”](#) *Public Policy & Aging Report* 25, no. 2 (Spring 2015): 52-55; Jonathan Schwabish, [“Downloading Benefits: The Impact of Online Food Stamp Applications On Participation,”](#) October 2012; Wojciech Kopczuk and Cristian Pop-Eleches, [“Electronic Filing, Tax Preparers, and Participation in the Earned Income Tax Credit,”](#) *Journal of Public Economics* 91 (2007): 1351-1367; Derek Wu and Bruce D. Meyer, [“Certification and Recertification in Welfare Programs: What Happens When Automation Goes Wrong?,”](#) Working Paper, December 2021.

<sup>10</sup> Jeffrey Hemmeter, John Phillips, Elana Safran, and Nicholas Wilson, [“Communicating Program Eligibility: An SSI Field Experiment,”](#) Working Paper, November 2020; General Services Administration (GSA), Office of Evaluation Sciences, [“Increasing SSI Uptake Among a Potentially Eligible Population,”](#) 2018.

<sup>11</sup> SSI disability claimants must complete additional forms that require documentation of their medical conditions and history, current and past work, education and training, and other information used to assess applicants for work-limiting disability. State employees assess the claimant’s evidence against SSA’s standards to determine whether the claimant meets the statutory definition of disability. SSA, POMS, [DI 11005.023](#), 2019; USC Title 42 § [423\(d\)\(1\)\(A\)](#), 1687 and § [1382c\(a\)\(3\)\(A\)](#), 2293.

lengthy evidence collection and timely processing of disability claims.<sup>12</sup> Because older adult SSI claims do not go through the disability determination process, a well-designed online SSI application may allow some older adults to fully self-serve online, potentially improving claims processing efficiency at SSA.<sup>13</sup> In addition, finding ways to reduce application barriers for older adults would enhance usability for others with differing abilities.<sup>14</sup> It would also benefit those assisting aged claimants to apply for SSI, whether they are family members, friends, or representatives. The Board urges SSA to introduce a separate online application process for older adults whose eligibility determination is limited to non-medical criteria. For older adult claimants, this would simplify and eliminate much of the lengthy application requirements that those applying for disability benefits must complete.

Given the complexity of the existing statute, significant SSI application streamlining may require Congressional action. Nevertheless, SSA has the authority to make certain application improvements that are user-centered and guided by design principles that make it suitable for people with diverse sociodemographic characteristics and functional abilities.<sup>15</sup> Such a design strategy would also support SSA's FY 22-26 Strategic Plan goals<sup>16</sup> that focus on addressing barriers to services and expanding digital services. It may further inform the agency's efforts to assess equitable service delivery, public preferences, and the need for online services, which SSA details in its FY 22-26 Learning Agenda.<sup>17</sup>

This statement, first, provides an overview of the SSI program. Next, it outlines existing SSI application channels and SSA's current and planned online SSI initiatives. Finally, it discusses potential barriers facing the SSI-eligible older adult population in using online services and how they could be mitigated when implementing an online SSI application.

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<sup>12</sup> SSAB, [Medical Evidence Collection in Adult Social Security Disability Claims](#), May 2022.

<sup>13</sup> Aubry and Wandrei, "[How to Increase Usage of SSA's Online Tools](#)," 5.

<sup>14</sup> Jonathan Lazar and Paul Jaeger, "[Reducing Barriers to Online Access for People with Disabilities](#)," *Issues in Science and Technology* 27, no. 2 (Winter 2011): 69-82.

<sup>15</sup> Department of Labor, Office of Disability Employment Policy, "[Universal Design Resources](#)," last accessed June 17, 2022.

<sup>16</sup> SSA, [Agency Strategic Plan: FYs 22-26](#), March 2022.

<sup>17</sup> SSA, [FYs 22-26 Learning Agenda](#), February 2022.

## Part One: Background

### A. Program Overview

SSI is a federal program administered by SSA that provides monthly cash assistance to people with low incomes and few assets who meet SSA's definition of disability, are blind, or are aged 65 or over.<sup>18</sup> In 2022, the maximum federal SSI benefit an eligible person with no other income can receive is \$841 per month (\$10,092 per year).<sup>19,20</sup> Generally, this amount is reduced if a person has other income.<sup>21,22</sup> As a result, in March 2022, the average federal SSI monthly payment was about \$604 (\$7,248 per year) for all recipients and about \$474 (\$5,688 per year) for recipients aged 65 and over.<sup>23</sup>

In addition, a person who has over \$2,000 in "countable resources," such as cash, liquid assets, or most other forms of property, is ineligible for benefits.<sup>24,25</sup> After initial allowance onto the program, recipients are responsible for reporting monthly to SSA any changes that may affect their SSI eligibility or

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<sup>18</sup> See 20 CFR § 416.202 for a list of eligibility requirements.

<sup>19</sup> SSA, "[SSI Federal Payment Amounts for 2022](#)," last accessed June 27, 2022.

<sup>20</sup> The Social Security Act provides for yearly adjustments to the maximum monthly federal SSI benefit amount to reflect inflation. SSA, "[Cost-of-Living Adjustment \(COLA\) Information for 2022](#)," last accessed June 27, 2022. Some states supplemental federal payments. SSA, "[Understanding SSI Benefits—2022 Edition](#)," last accessed June 27, 2022. In 2022, the federal poverty guideline for a single person is \$13,590. [Annual Update of the HHS Poverty Guidelines](#), 87 Fed. Reg. 3315 (January 21, 2022).

<sup>21</sup> SSA, "[SSI Income](#)," last accessed June 27, 2022.

<sup>22</sup> Some income is excludable. Social Security "disregards" a recipient's first \$20 of unearned income, like OASDI benefits, and their first \$65 dollars of earned income, like wages, per month. After these disregards, each dollar of a recipient's unearned income reduces their monthly SSI payment dollar-for-dollar, and each dollar of their earned income reduces their monthly benefit by 50 cents. After adding these disregards to the maximum payment amount, a person is allowed \$926 in total monthly income (equivalent to \$11,112 per year) before their benefit begins to be reduced, meaning reductions start while their total income is 81.8 percent of the federal poverty line of \$13,590 per year for a single person in 2022 (\$1,132.50 per month). SSA, "[Income Exclusions For SSI Program](#)," last accessed June 17, 2022; SSA, "[Understanding SSI Income—2022 Edition](#)"; Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, "[Poverty Guidelines](#)," accessed June 17, 2022. The income disregards are not indexed to inflation. Robert M. Ball, "[Social Security Amendments of 1972: Summary and Legislative History](#)," *Social Security Bulletin*, March 1973.

<sup>23</sup> SSA, "[SSI Monthly Statistics](#)," March 2022, Table 13.

<sup>24</sup> SSA, "[Understanding SSI Resources—2022 Edition](#)."

<sup>25</sup> The resource limit is not indexed to inflation; it was last increased from \$1,500 by the Deficit Reduction Act of 1984 and reached its current level in 1989. Pub. L. No. [98-369](#), 98 Stat. 494 (1984): 1130-1131.

benefit amount.<sup>26</sup> SSA field office staff must verify these details and process recipient reports. Both recipient advocates and SSA managers characterize this reporting and the associated processing requirements as burdensome.<sup>27</sup> Having non-excludable income or assets exceeding program limits in any given month makes an individual ineligible for SSI benefits in that month. Most recipients who remain ineligible for 12 consecutive months are terminated from the SSI rolls and must reapply.<sup>28,29</sup>

## B. SSA's SSI Application Process and Initiatives

Currently, most people must apply for SSI in person by visiting an SSA field office or by calling SSA's 800 number. Successfully filing an SSI application with SSA entitles a claimant to a written decision about their claim for SSI payments and the right to appeal that decision.<sup>30</sup> SSA field offices are responsible for verifying a claimant's non-medical SSI eligibility using the completed application form. Aged 65 and over SSI claims are approved by the field office if they satisfy non-medical criteria.

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<sup>26</sup> Changes that must be reported include: moving or changing address; changing direct deposit accounts; someone else moving into or out of the recipient's household; starting or stopping work; change in recipient's income or that of the recipient's family members; change in recipient's resources; living expenses paid for by someone else; entering or leaving an institution (hospital, nursing home, or prison); getting married, separated, or divorced; name change; becoming a parent; leaving the United States; outstanding felony or arrest warrants; being confined to a correctional facility; being a sponsored noncitizen; starting or stopping school attendance for recipients between ages 18-22; a recipient being incapable of managing funds; death of a recipient, change in immigration status; change in medical condition. Recipients residing in California must also report if where they eat most of their meals—at home or out—changes. Recipients residing in a facility that provides care in Hawaii, Michigan, or Vermont must also report if they have a change in the level of care provided to them, such as if they move from assisted living to a nursing home. SSA, [What You Need to Know When You Get SSI](#), August 2019.

<sup>27</sup> SSAB, [Summary of Disability Process Improvement Roundtables](#), October 2020, 5.

<sup>28</sup> SSA, POMS, [SI 02301.205](#), 2020.

<sup>29</sup> The work incentives available to SSI recipients with disabilities, such as expedited reinstatement of payments when earnings drop below SGA for a year or more, may not be available to those over full retirement age. SSA, "[Expedited Reinstatement \(EXR\)](#)," last accessed June 27, 2022; SSA, "[SSI Work Incentives](#)," last accessed June 27, 2022. Blind or disabled children of military personnel stationed overseas and "military-related" recipients (i.e., aged, blind, or disabled spouses residing in the United States or blind or disabled children residing in the United States or overseas) that become ineligible for SSI due to their spouse or parent being called to active duty have 24 months following suspension of SSI payments to have payments reinstated without having to file a new application. Recipients meeting additional criteria may have longer than 24 months to reinstate payments without needing to reapply. National Defense Authorization Act for FY 06, [Pub. L. No. 109-163 § 689](#); 119 Stat. 3136 (2006).

<sup>30</sup> SSA, POMS, [SI 00601.010](#), 2016; SSA, POMS, [SI 00602.001](#), 2017.



The existing statute makes determining SSI eligibility and payment amounts complex,<sup>31</sup> resulting in a “long”<sup>32</sup> and “burdensome”<sup>33</sup> application form. SSA’s current SSI application form for evaluating non-medical eligibility is 24 pages long.<sup>34</sup> Applicants must provide comprehensive information on their basic eligibility (e.g., name, date of birth, sex, Social Security number, marital status, citizenship), income, resources, and living arrangements to prove they meet program requirements. According to SSA’s policy guidance, the current SSI application form is not designed to be completed by a claimant independently; it should be completed by a “trained interviewer,” such as an SSA claims representative.<sup>35,36</sup> SSA does not provide the paper SSI application form online and states that requests for more than ten application forms should not be honored, partly because “forms may become obsolete due to frequent revisions” and “an interview with a claim representative is preferred.”<sup>37</sup>

Recent federal initiatives on customer experience and equity require agencies to minimize administrative burdens in public programs, including simplifying application processes and making online service options available.<sup>38</sup> To simplify the SSI application process, SSA has stated that it is reviewing the SSI claimant application experience, applicable law, and its business processes, policies, and regulations.<sup>39</sup> According to SSA, these efforts will rely on research about a claimant’s understanding of SSI application questions and their interactions with SSA and the application form. Based on an internal analysis of the SSI application process that is not publicly available, SSA concluded that user-informed revisions to the application beyond “simply digitizing the current

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<sup>31</sup> SSA, *FY 23 President’s Budget*, March 2022, 33; SSAB, *Statement on the SSI Program: The Complexity of In-Kind Support and Maintenance*, October 2015; Rene Parent and Richard Balkus, “[Efforts Since 2000 to Simplify the SSI Program: Legislative and Regulatory Changes](#),” SSA, Office of Retirement and Disability Policy, Policy Brief No. 2008-01, April 2008; Joyce Nicholas, “[Source, Form, and Amount of In-Kind Support and Maintenance Received by SSI Applicants and Recipients](#),” *Social Security Bulletin* 74, no. 3 (2014).

<sup>32</sup> SSA, POMS, [SI 00604.001](#), 2017.

<sup>33</sup> SSA, *FY 23 President’s Budget*, 155.

<sup>34</sup> SSA, *Application for Supplemental Security Income*, Form SSA-8000-BK.

<sup>35</sup> “Claims representative[s]” are SSA employees and are distinct from “appointed claimant representatives” who provide third-party support to applicants. SSA, POMS, [SI 00604.001](#), 2017.

<sup>36</sup> SSI disability claimants must complete additional forms that require documentation of their medical conditions and history, current and past work, education and training, and other information used to assess applicants for work-limiting disability, SSA, POMS, [DI 11005.023](#), 2019.

<sup>37</sup> SSA, POMS, [GN 00201.005](#), 2019.

<sup>38</sup> *Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, [Executive Order 14058](#) (December 13, 2021).

<sup>39</sup> SSA, *FY 23 President’s Budget*.

application (even with some refinements)” would improve the applicant experience.<sup>40</sup> SSA is working to reduce the number of SSI application questions from 60 to 23 total questions, revise the remaining questions, and refine their ordering to reduce applicant burden.<sup>41</sup> SSA plans to introduce a hybrid SSI application process option where claimants may begin the application online and receive support from SSA technicians only when needed.<sup>42</sup> SSA has not provided a timeline for implementing these application changes.

The COVID-19 pandemic underscores the need for an online SSI application to be available and accessible for older adults. In 2020, SSA field office closures to in-person service, except in dire-need cases, coincided with a 24 percent decrease in age-65-and-over SSI applications, relative to a 14 percent decrease in SSI disability applications in the same period.<sup>43</sup> Online service availability could have reduced the impact of pandemic-related service disruptions contributing to application decline.

## Part Two: Potential Barriers Preventing Online Application Use by Older Adults

In designing a separate online application process for older adults whose eligibility determination is limited to non-medical criteria, SSA should consider the following barriers that the older adult population may encounter when attempting to access and use an online SSI application and, to the extent possible, design and implement an online application that mitigates them. In doing so, it is critical that SSA solicit feedback from a diverse group of older adult users throughout the design process. Following implementation, SSA should continue to collect data regularly, consult end-users, conduct analyses of online application design and functionality to inform necessary updates, and make findings publicly available.

Federal agencies, including SSA, are using “journey maps,” stories of peoples’ experiences with government, to understand interactions with government services over time, common barriers people encounter, and research-informed

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<sup>40</sup> SSA, *FY 23 President’s Budget*, 163.

<sup>41</sup> Kate Lang, “[Improving Access to the Application for SSI Benefits](#),” Presentation, Justice in Aging, June 8, 2022, Slide 40, 42.

<sup>42</sup> Kate Lang, “[Improving Access to the Application for SSI Benefits](#),” Slide 41.

<sup>43</sup> SSA, *Annual Report of the SSI Program*, 2021.

interventions to improve their service experiences.<sup>44</sup> This section follows a hypothetical scenario by identifying:

1. Steps older adults would need to take to access and complete an online SSI application, were it available
2. Potential barriers that might prevent them from progressing forward to application completion
3. Insights from available literature and other agency experiences that could be leveraged to lessen potential application and administrative burdens

The Board acknowledges that the following discussion is non-exhaustive and does not consider the entire population of users that SSA serves. These strategies can provide the foundation for an incremental analysis of barriers facing other SSI-eligible subgroups to inform the design and deployment of an online SSI application.

## **A. Access to the Internet**

To apply for SSI online, older adults must have access to a reliable internet connection and application-compatible devices, such as a computer, tablet, or mobile phone, with the requisite system requirements to complete the application. While technology access and use are increasing among older adults, they remain lower among this population relative to other age groups.<sup>45</sup> According to the American Community Survey, roughly 42 percent of older adults (21.8 million) do not have internet access.<sup>46</sup> There are no data on how many have internet access but could not meet the systems requirements to satisfactorily access and complete an online application.

Among adults aged 62 and older, income below \$25,000 is among the strongest predictor for a lack of internet access.<sup>47</sup> Given the age, income, and resource criteria needed to qualify for program payments, SSI-eligible older adults are

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<sup>44</sup> Performance.gov, "[Mapping the Cross-Agency Customer Experience](#)," January 1, 2021; SSA, *FY 23 President's Budget*, 150.

<sup>45</sup> Monica Anderson and Andrew Perrin, "[Tech Adoption Climbs Among Older Adults](#)," Pew Research Center, May 17, 2017.

<sup>46</sup> AARP, Older Adults Technology Services, "[Aging Connected: Exposing the Hidden Connectivity Crisis for Older Adults](#)," 2021, 9.

<sup>47</sup> Connectivity gaps in the older adult population are also correlated with poor self-reported health status, physical limitations, rural residence, and other factors. AARP, "[Aging Connected](#)," 10-11.

likely over-represented among disconnected households. Though households with low incomes or who receive certain public assistance, including SSI, are eligible for discounted internet service through the Federal Communication Commission's (FCC) Affordable Connectivity Program,<sup>48</sup> recent research estimates that nearly 28 percent of likely eligible older adults for similar programs remain offline.<sup>49</sup> Additionally, simply providing internet access is insufficient without adequate training.

SSA is conducting outreach to make its constituents aware of the Affordable Connectivity Program and should continue to do so. It could also consider other approaches to lowering barriers for people without the internet to access an online SSI application. For example, the Department of Veterans Affairs (VA) Accessing Telehealth through Local Area Stations (ATLAS) initiative partners with public and private organizations, like Walmart, to connect veterans to VA telehealth services, focusing on rural areas.<sup>50</sup> SSA must consider the privacy and confidentiality implications of these approaches. As discussed in the following sections, older adults with internet access may face barriers beyond connectivity that may hinder accessing a potential online application.

## B. Identity Authentication

Older adults must be able to authenticate their identities to use SSA's online services. Many of Social Security's current online service options, including its online application for DI, are accessed through the agency's online portal, *my Social Security*. Successful identity verification needed to establish a *my Social Security* account may pose challenges for older adults. SSA's process increasingly relies on multi-factor authentication, requiring users to access multiple devices or navigate complex online authentication tools.<sup>51</sup>

The Board recognizes that robust systems security and identity protection are essential to minimizing identity theft and fraud. Acknowledging this, SSA could develop additional resources, such as pre-recorded instructional videos or

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<sup>48</sup> FCC, "[Affordable Connectivity Program](#)," last accessed June 17, 2022.

<sup>49</sup> AARP, "[Aging Connected](#)," 12.

<sup>50</sup> VA, Connected Care, "[VA and ATLAS](#)," last accessed June 17, 2022.

<sup>51</sup> Lila Rabinovich and Francisco-Perez-Arce, "[Mixed Methods Study to Understand Use of the my Social Security Online Platform](#)," Michigan Retirement and Disability Research Center, Working Paper 2021-428, September 2021; Sanchari Das, Andrew Kim, Ben Jelen, Joshua Streiff, L. Jean Camp, and Lesa Huber, "[Towards Implementing Inclusive Authentication Technologies for Older Adults](#)," *Who Are You?! Adventures in Authentication (WAY) 2019*, August 11, 2019.

printed material in plain language, to guide older adults (and their representatives and helpers) through authentication processes. SSA could also capitalize on existing federal initiatives intended to improve customer experience. The USA.gov website hosted by the General Services Administration (GSA) provides “single door access” to every federal agency website and includes search capabilities across agencies. For example, users can review detailed information about Login.gov,<sup>52</sup> one option SSA uses to authenticate new users for *my Social Security* and access the Login.gov help center for assistance.<sup>53</sup> This means members of the public could open a Login.gov account and receive assistance with the process before reaching SSA’s website.

### C. Service Preferences

Older adults must be willing to do business online. Research on the SSI older adult population’s engagement with SSA’s existing online services, including its SSI wage reporting app and newly launched electronic protective filing tool, would help to understand the factors driving the underutilization of these channels among this population. SSA-funded research on the retirement and survivors program finds that while 60 percent of the older adult claimant population apply or intend to apply for benefits online, less than half report doing so without receiving assistance from SSA.<sup>54</sup> Reasons for agency outreach included distrust of online tools, difficulty with SSA’s online tools, the need for additional information, and a preference for in-person interactions.<sup>55</sup> Demographic characteristics of the research participants who reported claiming online without assistance were those who used online banking and tax tools, lived in metropolitan areas, were married, white, and college-educated.<sup>56</sup>

Other mixed-methods research using interviews and quantitative data analysis from *my Social Security* online platform finds that security and privacy concerns, low internet literacy, and lack of awareness of the platform are reasons for non-use among adult users. However, older adults were more likely to report awareness and interaction with *my Social Security*.<sup>57</sup> Given these research findings, SSA should seek to understand better the reasons for reported security, privacy, and trust concerns around its online tools. This

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<sup>52</sup> Login.gov, “[What is Login.gov](#),” last accessed June 17, 2022.

<sup>53</sup> Login.gov, “[How Can We Help?](#)” last accessed June 17, 2022.

<sup>54</sup> Aubry and Wandrei, “[How to Increase Usage of SSA’s Online Tools](#),” 2-3.

<sup>55</sup> Aubry and Wandrei, “[How to Increase Usage of SSA’s Online Tools](#),” 14.

<sup>56</sup> Aubry and Wandrei, “[How to Increase Usage of SSA’s Online Tools](#),” 6.

<sup>57</sup> Rabinovich and Francisco-Perez-Arce, “[Mixed Methods Study to Understand Use of the my Social Security Online Platform](#),” 29-30.

information provides SSA the opportunity to target approaches to address these concerns.

Online scam victimization, the deliberate use of deceptive tactics, may be one driver for the in-person service preference. Aging is correlated with factors positively associated with increased scam susceptibilities, such as declines in cognitive functioning and financial decision-making.<sup>58</sup> While older adults tend to be less likely to report scam victimization, those that do, report higher median losses than other age groups.<sup>59</sup> In particular, research on the impact of recent widespread SSA imposter scams on older adults' use of SSA's online services is needed.<sup>60</sup>

#### **D. Online Application Accessibility and Usability**

Usability testing of existing online tools among older adults reveals navigational, instructional, and aesthetic barriers that may prevent or discourage adoption.<sup>61</sup> Universal Design provides a framework for designing online tools that maximize the functional abilities of diverse end-users, including older adults, to increase engagement and minimize stigmatization.<sup>62</sup> This is accomplished by incorporating accessible, minimally disruptive design

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<sup>58</sup> Marguerite DeLiema and Paul Witt, "[Mixed Methods Analysis of Consumer Fraud Reports of the SSA Imposter Scam](#)," Michigan Retirement and Disability Research Center Working Paper 2021-434, October 2021; S. Duke Han, Patricia A. Boyle, Bryan D. James, Lei Yu, and David A. Bennett, "[Mild Cognitive Impairment and Susceptibility to Scams in Old Age](#)," *Journal of Alzheimer's Disease* 49, no. 3 (October 2015): 845-851; Ari B. Friedman, Chris Pathmanabhan, Allen Glicksman, George Demiris, Anne R. Cappola, and Matthew S. McCoy, "[Addressing Online Health Privacy Risks for Older Adults: A Perspective on Ethical Considerations and Recommendations](#)," *Gerontology & Geriatric Medicine* 8 (2022): 1-7.

<sup>59</sup> DeLiema and Witt, "[Mixed Methods Analysis of Consumer Fraud Reports of the SSA Imposter Scam](#)," 8.

<sup>60</sup> DeLiema and Witt, "[Mixed Methods Analysis of Consumer Fraud Reports of the SSA Imposter Scam](#)," 2.

<sup>61</sup> Tracy L. Mitzner, Jyoti Slavla, Walter R. Boot, Joseph Sharit, Neil Charness, Sara J. Czaja, Wendy A. Rogers, "[Technology Adoption by Older Adults: Findings from the PRISM Trial](#)," *The Gerontologist* 59, no. 1 (February 2019): 34-44; Stephanie A. Morey, Rachel E. Stuck, Amy W. Chong, Laura H. Barg-Walkow, Tracy L. Mitzner, and Wendy A. Rogers, "[Mobile Health Apps: Improving Usability for Older Adults Users](#)," *Ergonomics in Design: The Quarterly of Human Factors Applications* 27, no. 4 (April 1, 2019); Sara J. Czaja, "[Usability of Technology for Older Adults: Where Are We and Where Do We Need to Be](#)," *Journal of User Experience* 14, no. 2 (February 2019): 61-64.

<sup>62</sup> Kelly Carr, Patricia L. Weir, Dory Azar, and Nadia R. Azar, "[Universal Design: A Step toward Successful Aging](#)," *Journal of Aging Research* 2013 (January 30, 2013): 2.

elements that benefit all users.<sup>63</sup> Design features recognized internationally include:<sup>64</sup>

1. **Equitable Use:** The design does not disadvantage or stigmatize any group of users.
2. **Flexibility in Use:** The design accommodates a wide range of individual preferences and abilities.
3. **Simple, Intuitive Use:** Use of the design is easy to understand, regardless of the user's experience, knowledge, language skills, or current concentration level.
4. **Perceptible Information:** The design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities.
5. **Tolerance for Error:** The design minimizes hazards and the adverse consequences of accidental or unintended actions.
6. **Low Physical Effort:** The design can be used efficiently and comfortably, with minimal fatigue.
7. **Size and Space for Approach & Use:** Appropriate size and space are provided for approach, reach, manipulation, and use, regardless of the user's body size, posture, or mobility.

With advancements in information technology, design strategies that adhere to these principles support a broader user base and help avoid costly redesign.<sup>65</sup> In tandem with Section 508 requirements, the statutory requirement for accessible electronic and information technology in the federal government,<sup>66</sup> Universal Design aligns with federal initiatives focusing on diversity, equity, inclusion, and accessibility.<sup>67</sup>

Building on Universal Design principles and other aging and usability models, the Universal Design Mobile Interface Guidelines (UDMIG) outline features to improve the usability of mobile devices and applications for older adults.<sup>68</sup> SSA should consider adopting UDMIG elements in an online SSI application, such as:

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<sup>63</sup> Carr, Weir, Azar, and Azar, "[Universal Design: A Step toward Successful Aging](#)," 2.

<sup>64</sup> Institute for Human Centered Design, "[Inclusive Design](#)," last accessed June 17, 2022.

<sup>65</sup> Section508.gov, "[Universal Design: What Is It?](#)" accessed June 17, 2022.

<sup>66</sup> Access Board, "[Section 508 \(Federal Electronic and Information Technology\)](#)," accessed June 17, 2022.

<sup>67</sup> *Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, [Executive Order 14035](#) (June 25, 2021).

<sup>68</sup> Ljilja Ruzic, Seunghyun Tina Lee, Yilin Elaine Liu, and Jon A. Sanford, "[Development of Universal Design Mobile Interface Guidelines \(UDMIG\) for Aging Population](#)," in *Universal Access in Human-Computer Interaction. Methods, Techniques, and Best Practices*, eds. M. Antona and C. Stephanidis (Switzerland: Springer International Publishing, 2016): 98-108.

- Universal and recognizable icons for text size, audio speed, and contrast
- Large buttons with enough space between the buttons to minimize the need for accuracy and precision
- Deconstruction of complex tasks into several easy-to-complete subtasks to reduce complexity
- Simultaneous visual and audio interface
- Universal icons along with redundant cues (e.g., color, text, and symbols)
- A review page that provides easy reversal of actions

In addition, when designing an online SSI application, SSA should consider the following form-related suggestions from invited participants during a Board-hosted roundtable on the claimant experience in the disability application process.<sup>69</sup>

- Review SSA forms with the help of behavioral scientists and adult education specialists to make them more user-friendly for claimants and efficient for SSA and DDS workers
- Separate instructions into smaller chunks by placing them at each section instead of only at the beginning of a form
- Add extra information and define terms, such as work-related terms (e.g., “full-time” and “part-time”), and revise questions to provide context on how the issues relate to work and disability (e.g., workers compensation questions, public disability benefits)
- Regularly conduct cognitive testing assessing user comprehension of application questions, not only when making a change
- Ensure a representative population for testing changes (i.e., consider selection bias)

Online-application-specific suggestions:

- Dropdown menus to help solicit relevant information (i.e., a defined list of conditions)
- A remarks section to provide additional information, since applicants are unable to go back after clicking “review and accept”

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<sup>69</sup> SSAB, [Summary of Disability Process Improvement Roundtables](#), October 2020, 14-16.



- A click-to-chat option for online application assistance

SSA could also explore incorporating telephonic voice recognition technologies to analyze questions about online application processes.<sup>70</sup> This technology uses artificial intelligence to field questions and provide information and learns to cluster similar questions to responses. The technology could provide data on frequently asked topics and be used to refine the online process.

SSA should also integrate insights from research on its existing online tools and claim forms when assessing the current SSI application and designing an online claim tool. Based on users' reported reasons for contacting SSA during the online claiming process, SSA-funded research finds that the agency could increase the share of people claiming completely online by improving tool usability, making more information about its programs available online, and increasing awareness of its online tools.<sup>71</sup>

Finally, the Board reiterates the importance of relying on a wide range of design, systems, and end-user perspectives and incorporating insights from academic literature, data, agency and community partners, and customers when designing and deploying an online SSI application. It is encouraging that SSA is investing in direct outreach to people facing barriers and forming community partnerships to support this effort further.<sup>72</sup> Efforts to reduce the application burden, whether online, in-person, or by phone, will be pivotal in securing and expanding government and community partnerships.

## Conclusion

The introduction of an online SSI application dedicated to the needs of older adults—those who would qualify based on non-medical criteria—has the potential to increase access options for this population and lower administrative costs for SSA. It may also introduce barriers for some potential users if its design is not driven by customer experience and design principles that support diverse user needs. When designing and implementing a dedicated online SSI application, SSA must minimize potential accessibility and usability barriers for older adults, including internet access, authentication, service preferences, and application design and functionality. Further, to

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<sup>70</sup> Federal News Network, Insight by Verizon, "[How Verizon Built a Natural Language IVR Call System for a Federal Agency in 2 Months](#)," April 8, 2022.

<sup>71</sup> Aubry and Wandrei, "[How to Increase Usage of SSA's Online Tools](#)," 14.

<sup>72</sup> SSA, [FY 23 President's Budget](#), 4.

inform application development and deployment, SSA must rely on a wide range of design, systems, and end-user perspectives and incorporate insights from academic literature, data, agency and community partners, and customers.

In summary, the Board recommends that SSA:

- Following the implementation of an online application, continue to collect data regularly, consult end-users, conduct analyses of online application design and functionality to inform necessary updates, and make findings publicly available
- Continue to conduct outreach to make its constituents aware of the Affordable Connectivity Program
- Consider other approaches to lowering barriers for people without internet to access an online SSI application, being mindful of the privacy and confidentiality implications of these approaches
- Develop resources, such as pre-recorded instructional videos or printed material in plain language, to guide older adults through authentication processes
- Capitalize on existing federal initiatives intended to improve customer experience, such as the USA.gov website hosted by GSA, which could allow members of the public to open a Login.gov account and receive assistance with the process before reaching SSA's website
- Seek to better understand the reasons for reported security, privacy, and trust concerns around SSA's online tools
- Support research on the impact of recent widespread SSA imposter scams on older adults' use of SSA's online services
- Consider adopting UDMIG elements—design features to improve the usability of mobile devices and applications for older adults—in an online SSI application
- Consider application form-related suggestions raised by invited participants during a Board-hosted roundtable on the claimant experience in the disability application process, including those specific to an online application
- Explore incorporating telephonic voice recognition technologies to analyze user questions about online application processes, and use the resulting data collected by the tool to refine the online process

- Integrate insights from research on its existing online tools and claim forms when assessing the current SSI application and designing an online claim tool

Research suggests that older adults generally have positive opinions of technology and are willing to use it, but usability barriers may stand in the way.<sup>73</sup> Program policy will dictate application content. However, SSA can use user-centered design principles to lessen potential barriers, enabling older adults to complete the process independently or with the support of others.

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Nancy J. Altman

Jagadeesh Gokhale

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<sup>73</sup> Tori DeAngelis, "[Optimizing Tech for Older Adults](#)," *American Psychological Association, Monitor on Psychology* 52, no. 5 (July 1, 2021).

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