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June 24, 2020

The Honorable Andrew Saul
Commissioner
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235

Dear Commissioner Saul,

Field offices are an essential part of Social Security's service to the American public. The Social Security Administration (SSA) maintains a national network of over 1,200 field offices, and tens of millions of Americans rely on these offices each year for information about SSA services and access to Social Security, Supplemental Security Income, and Medicare benefits. Field offices are highly valued resources in our communities, especially for people with complex situations that cannot be easily handled online or over the phone and for people who do not have access to the internet. We know firsthand that closure of a field office can have tremendous adverse impacts on affected communities.

We write to request that SSA provide a formal response to the recent report¹ by the Social Security Advisory Board (Board) regarding SSA field offices. The Board is a bipartisan, independent federal government agency created by Congress to advise the Commissioner of Social Security, including with respect to the agency's service to the public.

Foremost, the Board's report highlighted the public's ongoing need for field offices. Despite significant expansion of on-line services, the need for local field office service remains strong. Over the past decade, there has been no diminution in visits or calls to local field offices, which received an average of 43 million visitors and 57 million callers per year between 2007 and 2019. Even as the COVID-19 pandemic led to the difficult, but necessary, decision to temporarily close SSA offices to most in-person visitors, field offices have continued to serve their local communities and their role remains as vital as ever.

¹ Examining Social Security's Service to the Public: Decisions Regarding Field Office Closures: June 2020
<https://www.ssab.gov/research/service-to-the-public/>

The Board's report also underscored many of the harmful effects of ill-advised field office closures on the people once served by these closed facilities, including some of the most vulnerable community residents. The report is clear that SSA's process for deciding whether to retain or close a field office is broken and that key elements of that process are insufficient or simply not being followed. The Board urged SSA to "clarify its decision-making process, increase transparency, and involve the public in its deliberations about field office closures," among other recommendations. We fully agree.

Given how critical SSA field offices are in delivering services to the public, we believe the American people and Congress deserve to hear SSA's position on the issues raised in the Board's report, and how you plan to address them. In general, what do you intend to do to ensure that SSA maintains a strong national network of field offices, and to tackle the problems highlighted in this report? Specifically, how do you intend to address the following points from the report:

1. A continued lack of transparency.

- "The Board urges the Commissioner of Social Security to initiate a data-driven approach to monitoring service delivery across its service channels."
- "To the extent its pre-closure decision-making is shared publicly, SSA appears to lack the specificity necessary for program evaluation. Similarly, despite decades of calls for a more rigorous and open process, SSA lacks, or fails to make public, any post-closure evaluation and fails to formally incorporate efforts to mitigate the effects of closures on affected communities."

2. Failures to adequately and timely engage with public stakeholders, including local and federal elected officials as well as the public.

- "SSA should also engage the public when evaluating changes to service delivery because transparency and outside input result in better public service by providing greater review of evidence about outcomes of different choices."
- "SSA's revised 2017 guidance for Service Area Reviews (SARs) still does not address ways to engage local leaders, managers, and community members in the decision-making process..." "...public officials said that they could have helped locate unused public buildings, if they had known of the planned closing."

3. Failures to conduct adequate research and analysis to better understand the impacts of closures, especially on the most vulnerable. Examples of gaps include:

- Findings that the closure process did not analyze or address the internet access and usage in the local area, the adoption of alternative delivery methods to affected communities, or other unmet resource needs.
- A call for SSA to "consider existing research and conduct its own analysis of the varied service needs of its constituents" as part of the decision-making process.
- Better assessment of research to understand the disparate impacts of closure on some populations, including those eligible for disability insurance.

Letter to Commissioner Saul

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When you took office, you announced your intention to strengthen SSA's customer service – a priority that we share. Given that field offices are a key part of SSA's service to the public, we urge you to demonstrate your commitment to customer service by maintaining a robust nationwide network of field offices, and by ensuring better transparency, public engagement, and use of evidence, including on potential adverse impacts of closures, in decisions around field office services.

We look forward to receiving your response and continuing to work together to ensure local service to our communities.

Sincerely,



John B. Larson
Chairman
Subcommittee on Social Security
Committee on Ways and Means



Gwen Moore
Member of Congress
Committee on Ways and Means



Brian Higgins
Member of Congress
Committee on Ways and Means