

Social Security Administration Equity Action Plan 2023 Update



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I. Message from Commissioner O'Malley



Nearly a century ago, thousands of older people wrote letters to President Franklin D. Roosevelt and other national leaders to share their stories of hardship. Today, the Old-Age, Survivors, and Disability Insurance (OASDI) program protects more than 181 million workers — and their families — in the event of loss of income due to retirement, disability, or death. In addition, the Supplemental Security Income (SSI) program helps to lift people receiving payments, including millions of children with disabilities, out of poverty.

We must administer our programs equitably to ensure access for underserved people. To effectively serve the public, we acknowledge the racial, gender-based, and socioeconomic structural barriers people face, and learn from their lived experience to inform our practices and priorities. I adamantly believe people closest to the problem should participate in developing the solutions.

Over the past year, we have prioritized improving our service delivery, including our [equity initiatives](#)¹, and outreach to those who need our services and benefits the most. I am proud to say that we achieved our Fiscal Year (FY) 2023 goal of increasing SSI applications in underserved communities by 25 percent relative to the 2021 baseline. We nearly met our goal to increase SSI applications nationwide by 15 percent relative to the 2021 baseline, which approaches pre-pandemic levels.

We committed our subject matter experts to reduce administrative burdens for underserved communities, including people of color, LGBTQIA+² communities, and people living with disabilities. The less complex we can make our business process and policies, the easier they are to understand and manage. We published long-awaited data by race and ethnicity that provide us, and the public, better estimates of who receives our benefits. Our [published data](#)³ help us prepare strategies over the long-term to ensure that those who are eligible for our program benefits receive them. Along with rebuilding our workforce, we are prioritizing our IT investments to make us more efficient and help us reduce the wait times for our services.

Our ability to improve service to the public largely depends on our administrative funding. I will keep fighting for the sustained and sufficient funding and staffing levels we need to meet the public's expectations for timely customer service. I rely on our dedicated staff to spearhead our equity initiatives to make a lasting difference and ensure equitable outcomes for the public.

I am delighted to present our Equity Action Plan 2023 Update. We will foster an equitable and inclusive environment that serves all individuals with dignity and respect.

Sincerely,

A handwritten signature in black ink, which appears to read "Martin O'Malley". The signature is fluid and cursive, with a large loop at the end.

Martin O'Malley
Commissioner

II. Advancing Equity Through Agency Mission

Social Security provides a financial safety net for millions of people. Our mission is to ensure equity and accessibility in delivering Social Security services by improving the customer experience and addressing systemic barriers to participation in our programs. We recognize that our administrative system may pose barriers to people who need our programs the most, including people living with disabilities, populations who have limited English proficiency (LEP), and households that need additional income support due to disability or death of a loved one. We are committed to administering our programs in a way that promotes equity by eliminating barriers to participation in our programs, reaching out to people who may be underserved, and improving service delivery.

III. Executive Summary of Equity Action Plan

Advancing equity involves removing unnecessary administrative burdens, ensuring access to quality services and program benefits regardless of an individual's ability to communicate in English, and increasing data collection to extend outreach and better serve people seeking our programs and services. To reduce systemic barriers, we will simplify the SSI application and processes; improve language access to better serve LEP communities; address our timely processing of SSI underpayments and assess root causes for improper payments; increase awareness of survivors benefits to children and families, same-sex couples, and people disproportionately impacted by COVID-19; and increase opportunities for the voluntary collection of race and ethnicity data.

Improve Access to the Supplemental Security Income Program for Women, Families, Individuals from Underserved Communities, and Other People Facing Barriers.

The complexity of our SSI program—driven in part by legislative, regulatory, and sub-regulatory requirements—can create burdens for program applicants. Many of our customers may need help to complete the SSI application. Although we have more than 1,200 field offices across the country, some customers, especially those in rural areas or on Native American reservations, may not be able to get to a field office for in-person help. To meet our customers' needs and advance equity, we are streamlining our regulations, simplifying the application process, and releasing digital tools for electronic form submission to improve an applicant's ability to complete the application process and receive the full benefits for which they are entitled.

Improve Equity in Access to Our Programs for Our Customers Who Communicate Primarily in Languages Other than English.

Navigating our processes can be economically, socially, and culturally challenging due to complexities in the application and in the policy. Many applicants with limited English proficiency may have difficulty answering questions, which can lead to incomplete applications and technical denials. We are increasing availability of translated materials and the number of languages in which those materials are offered, improving access to language interpretation services, and increasing culturally attuned outreach to Native American and Alaska Native, LEP, and migrant communities.

Reduce Pending SSI Underpayments to Improve Equity in the Delivery of Payments to Our Customers Disproportionately Affected by Poverty

Today, approximately 7.4 million⁴ people living in the U.S. receive SSI and count on us to provide accurate and on-time payments. To improve equity in the delivery of payments to customers, we will assess the root causes of improper payments, improve payment accuracy, and focus on reducing SSI underpayments as part of our Agency Priority Goal on equity.

Increase Awareness of Survivors Benefits Eligibility for Children, Families, Same-Sex Couples, and People Disproportionately Impacted by COVID-19.

The loss of a family member who contributed to the household income can be devastating both emotionally and financially. Increasing awareness of benefit and eligibility requirements for survivors benefits may increase economic security for children, families, and same-sex couples, as well as communities disproportionately impacted by COVID-19, including Black, Latino, and Native American and Alaska Native communities.^{5, 6, 7}

Increase Race and Ethnicity Data Collection to Further Identify, Monitor, and Address Service Inequities.

Since 1987, a significant decline in demographic data in our records made it more difficult for us to monitor the experience of people of color and other underserved communities in our programs. We will work with State partners to increase opportunities for the voluntary collection of race and ethnicity data through Enumeration at Birth⁸ (EAB) and other SSN card touchpoints, such as replacement applications. The increased data will help us determine whether different groups are underrepresented in our programs, provide insight into how different communities interact with our programs, and help us examine variability in program participation and benefit levels based on demographic makeup.

IV. Equity Progress Update and Accomplishments

A. 2022 Equity Action Plan Update (pursuant to Executive Order (EO) 13985):

Focus Area #1: Identifying Inequities in Programs and Services

We improved race and ethnicity data collection which helped us better understand how our programs work for different groups and took steps to better serve those groups. We also published many race and ethnicity research and statistical products on our [Racial Equity Research, Statistics, and Data Resources website](#).

Accomplished Deliverables:

- 1) In June 2022, we resumed publication of statistics on OASDI benefits in current payment status by race as [Appendix E](#) in the Annual Statistical Supplement. In August 2023, the Annual Statistical Supplement included updated sets of the 12 tables analyzing payments by race and ethnicity in the body of the publication under [Summary 5.A Expanded by Race](#). We also published Modeling Income in the Near Term (MINT) projections, MINT fact sheets, and Retirement and Disability Research Consortium working papers, providing updated projections, including by race and ethnicity, to inform agency and academic research.
- 2) In August 2022, we added race and ethnicity questions to the [online SSN application process \(oSSNAP\)](#) used to obtain an SSN card, resulting in an increase, from August 2022 to August 2023, for voluntary reporting of race information from 46 percent to 52 percent, and of ethnicity information from 54 percent to 59 percent.
- 3) In FY 2023, we created the Race and Ethnicity Voluntary Reporting Tracking Dashboard to inform our collection strategies.
- 4) In June 2023, we provided public information materials in English and Spanish to encourage voluntary reporting of race and ethnicity data during new and replacement SSN card applications in select Social Security Administration (SSA) field offices.
- 5) In August 2023, we made form SS-5 (Application for a Social Security Card) instructions available in 15 languages other than English and Spanish in local SSA field offices and Card Centers. The non-English instructions will help applicants with LEP complete the English-language form SS-5.
- 6) In September 2023, we added race and ethnicity questions to the [internet SSN replacement application process \(iSSNRC\)](#) used to obtain a replacement SSN card through the [my Social Security \(mySSA\)](#) portal.

Milestones:

- 1) On August, 17, 2023, we published a [Federal Register Notice](#) to notify the public about the plan to add voluntary race and ethnicity data collection through the EAB process and gave the public an opportunity to comment.
- 2) In September 2023, we completed our campaign of letters to Governors to encourage the voluntary collection of race and ethnicity data from State natality records. The campaign resulted in nine States/territories agreeing to collect race and ethnicity data voluntarily through the EAB process and eight States expressing interest in discussing the initiative further. To date, one State is under contract to include race and ethnicity voluntary collection capability through EAB.
- 3) In November 1, 2023, we published a System of Records Notice to notify the public about the collection, use, maintenance, and dissemination of race and ethnicity data.

Focus Area #2: Identifying and Addressing Systemic Barriers to Program Participation

We collaborated with internal and external partners to make it easier for customers to participate in our programs by shortening and simplifying forms and offering more ways to connect with us online and in person.

Accomplished Deliverables:

- 1) In FY 2023, to restore SSI applications closer to pre-pandemic levels, we launched a new SSI "Basic Needs" campaign in support of our FYs 2022-2023 Agency Priority Goal (APG) to increase SSI applications nationwide by 15 percent and increase applications from underserved⁹ communities by 25 percent, 1,758,656 and 127,749 applications, respectively. We have seen an increase in the overall number of SSI applications, nationally and in underserved communities. Since the campaign launched:
 - a. Our digital marketing tactics generated 1.81 million referrals from our SSI website to the online [SSI Protective Filing tool](#), yielding 345,000 SSI applications through September 3, 2023. The tool allows individuals and third-party helpers to establish a protective filing¹⁰ online and request an appointment to file for benefits.
 - b. Our marketing generated more than 1.9 billion impressions across all tactics and over 2.7 million website visits.
 - c. Through September 29, 2023, we exceeded our APG target for SSI applications in underserved communities relative to the 2021 baseline by receiving nearly 135,000 applications. We were about one percent short of the nationwide SSI application target of increasing applications by 15 percent relative to the 2021 baseline, receiving about 1.74 million applications.
 - d. We added a paper survey to 300,000 of the 2.1 million mailers and added an online survey for those who visited our English and Spanish vanity URL, or custom shortened link. We received 2,575 responses with as many as 81 percent of the respondents saying the information was either "very helpful" or "helpful", among other key findings.
- 2) In FY 2023, we hosted several *Outreach to Supplemental Security Income (SSI) Kids Subgroup Meetings* and listening sessions with advocates to gain a better understanding of external experiences related to SSI for children, and to hear fresh ideas on how to reach parents and caregivers.
- 3) In FY 2023, we mailed a notice to more than 323,000 SSI recipients between the ages of 14 and 17 (transition-aged youth) and their adult representatives, to provide more information about the changes that happen with [SSI payments when youth turn age 18](#).¹¹
- 4) On October 4, 2022, we established the Office of Native American Partnerships, and published an accompanying [press release](#). The office's mission is to elevate and centralize efforts to administer comprehensive programs and policies related to American Indians and Alaska Natives. The office also works to enhance our relationship with Tribes and serves as the primary point of contact on Tribal affairs.
- 5) In February 2023, we streamlined the Continuing Disability Review Report to make it easier to complete, by:
 - a. Shortening form SSA-454, Continuing Disability Review, from 15 to 12 pages,
 - Simplified the questions,
 - Removed free format narrative responses, and
 - Removed the requirement for specific dates for medical sources.
 - b. Creating an internet version (iCDR/i454) of the form.

SSI "Basic Needs" Campaign Marketing Tactics

The campaign's digital tactics included Search Engine Marketing, social media, online display ads, YouTube video ads, and an updated SSI webpage.

Non-digital tactics included TV and radio public service announcements, radio ads, direct mail to 2.1 million households in underserved communities, convenience store posters, and drugstore bag inserts.

- 6) In May 2023, we established the Office of Transformation (OT), which includes our Customer Experience (CX) team. The OT's mission is to facilitate the most critical business enhancements that serve the public and support our frontline employees. The mission is underpinned by CX to ensure equitable access to SSA's programs. The OT is undertaking the SSI simplification equity strategy and plans to include accessibility expertise to ensure greater disability equity in our initiatives.
- 7) On August 21, 2023, we removed the signature requirement for all versions of form SSA-455, Continuing Disability Review, making it less burdensome for the public to complete and submit.
- 8) In September 2023, we implemented the new Upload Documents portal. This portal allows respondents to submit evidence and some SSA forms electronically through an Internet portal. In addition, we also are allowing eSignature of some forms through the Upload Documents portal. This new portal reduces the need for respondents to call or travel to a field office to submit forms or evidence.

Milestones:

- 1) In the Spring of 2023, we conducted community-based participatory research on barriers faced by people living in the U.S. with disabilities or impairments. We also formed a technical working group (TWG) consisting of people with disabilities who helped design the study, monitored the progress, and reviewed and provided comments on products. We compensated TWG participants while protecting participant eligibility in benefit programs, the first time a Federal agency has done this. Paying lived experience experts, per activity, fostered meaningful relationships with communities served by the Government, and offered unique opportunities for innovative improvements in policy and programming based on data rooted in and guided by lived experience.
- 2) In the Fall of 2023, we published a [Regulatory Agenda](#)¹² that prioritizes equity, including:
 - a. SSI Simplification – Omitting Food from In-Kind Support and Maintenance Calculations
 - b. SSI Simplification – Nationwide Expansion of the Rental Subsidy Policy for SSI Recipients
 - c. SSI Simplification – Expand the Definition of a Public Assistance (PA) Household
 - d. Intermediate Improvement to the Disability Adjudication Process: Including How We Consider Past Work
 - e. Manner of Appearance at Hearings
 - f. Use of Electronic Payroll Data to Improve Program Administration

Focus Area #3: Ensuring Equitable Service for Unrepresented Claimants in the Disability Application Process

We monitored cases and communicated the availability of representation to unrepresented claimants to help ensure equitable services for represented and unrepresented claimants.

Accomplished Deliverables:

- 1) A claimant may appoint someone to represent them in matters before SSA, such as appealing the denial of an application for disability benefits. Effective November 30, 2022, we increased from \$6,000 to \$7,200 the maximum fee amount a representative may receive using the fee agreement process (one of two mutually exclusive fee authorization processes). This was the first increase in 13 years, with the intent to incentivize representatives to take on more SSI claimants as clients.
- 2) In FY 2023, we exceeded our FY 2023 goals for targeted review of sample cases with denial determinations to ensure effective and uniform administration of the disability program by completing 25,157 cases.
- 3) In FY 2023, we continued to reach out to unrepresented claimants to prepare them for the hearing process and explain their right to representation.

Milestones:

- 1) In April 2023, we approved a workgroup proposal for a centralized Representative Referral List. The proposed online referral list will improve awareness of and access to representational services for individuals interested in obtaining representation.
- 2) In April 2023, we held a benchmarking session with the Department of Justice on their [List of Pro Bono Legal Service Providers](#), providing us an exemplary online referral model for legal service providers.

Focus Area #4: Increasing Gender Equity and Equality in our Programs

We made it easier for people to conduct business with us in their self-identified gender.

Accomplished Deliverables:

- 1) On September 23, 2022, we published sub-regulatory guidance on self-attestation for change of sex designation for the SSN card application process.
- 2) On April 20, 2023, we updated quality review instructions and subsequently updated 300+ policies with gender-neutral language in FY 2023.

Milestones:

- 1) In FY 2023, we conducted product discovery to add an "X" Gender Marker to the NUMIDENT and identify all downstream impacts. We expect to complete discovery in the first quarter of FY 2024.
- 2) In Spring 2023, we trained our employees on unconscious bias and gender-based discrimination with a 98 percent employee completion rate.

Focus Area #5: Increasing Access to Our Research Contract & Grant Opportunities to Historically Black Colleges and Universities (HBCU), Institutions Serving Students of Color (ISSC)¹³, and Small and Disadvantaged Businesses (SDBs)¹⁴

We improved the services we use to conduct our business and serve the public equitably by broadening our sources to include more small businesses owned by people of color. Additionally, these accomplishments support the agency goals for advancing equity in research to improve our service delivery and programs.

Accomplished Deliverables:

- 1) In FY 2022, we received a grade 'A' on our Small Business Procurement Scorecard from the Small Business Administration. We are very proud to have achieved and exceeded our overall Small Business Goal along with three of the four socio-economic goals: Small Disadvantaged Business (SDB), Women Owned Small Business (WOSB), and Service-Disabled Veteran Owned Small Business. SSA has received an 'A' on our scorecard every year since 2013.
- 2) In January 2023, we created a strategic outreach campaign using an agency-wide listserv of HBCUs, ISSCs, and professional organizations with diverse membership to encourage them to apply to our research funding opportunities.
- 3) In Spring 2023, we provided informational webinars to HBCUs and ISSCs about grants in advance of the Request for Application (RFA) publications.
- 4) In Summer 2023, we completed the Retirement and Disability Research Consortium (RDRC) recompetition for the five-year agreements (i.e., research grants) covering activities for FY 2024 – FY 2028. Six centers were selected to receive the awards. Five out of six centers include HBCUs or ISSCs as partners, with HBCU and ISSC staff leading the centers as directors or co-directors.
- 5) In September 2023, our OT participated in the "The Future of Cyber Resilience - How HBCUs Can Change the Game" panel. We discussed how HBCUs can strategically posture themselves to contribute to the Artificial Intelligence and Machine Learning space to increase cyber resilience.

Milestones:

- 1) In FY 2023, we participated in a General Services Administration (GSA) focus group on improving procurement forecasts Government-wide and standardizing forecasts presentations for SDBs.
- 2) In FY 2023, we worked with contracting personnel to set-aside procurements, conducted using GSA Advantage and Governmentwide Acquisition Contracts (GWACs), for SDBs.

B. Environmental Justice Scorecard (pursuant to section 223 of EO 14008): N/A

C. Additional Efforts to Advance Equity:

To improve service and support our SSN card business process:

- 1) In March 2023, we introduced the Enterprise Scheduling System, which allows individuals to schedule field office appointments online for SSN card purposes. Previously, we could only schedule the enumeration appointments via telephone or in person. The new self-help portal alleviates wait time for individuals who need to schedule these appointments.

In partnership with the United States Citizenship and Immigration Services (USCIS), we:

- 1) Presented at multiple USCIS stakeholder and public meetings on the final rule of the "Public Charge Ground of Inadmissibility¹⁵."
- 2) Extended benefits normally reserved for refugees to certain qualifying Ukrainian and Afghan citizens.
- 3) Translated a key Social Security publication, [Social Security Numbers for Noncitizens](#)¹⁶, into 18 languages.
- 4) Provided two videos with key information about Social Security programs in English and Spanish to be used during USCIS Welcome Seminars for newly naturalized citizens.

Our new Office of Native American Partnerships accomplished the following actions:

- 1) Coordinated five in-person engagements with the Acting Commissioner and Tribal Leaders and Benefit Coordinators in Tribal and surrounding communities in the following locations: Anchorage, Alaska; Kansas City, Missouri; Chicago, Illinois; San Francisco, California; and, Pine Ridge, South Dakota. These engagements created opportunities to build partnerships with community organizations and to offer support to claimants seeking retirement, disability, and survivor benefits.
- 2) Received feedback from Tribal communities on recommendations for locations to implement video equipment to bridge the distance between their Tribal communities and field offices.
- 3) Implemented a pilot program in which SSA employees were flown to three remote communities in Alaska and provided services to community members at local health facilities.
- 4) Received valuable feedback from Tribal Nations and Urban Indian Organizations highlighting a barrier to services and a business need for SSA to provide training support to new Tribal Benefit Coordinators working in Urban Indian Centers and Indian Health Services in underserved communities. These Coordinators, who are not SSA employees, require programmatic policy training to provide awareness of eligibility to our programs and support to Tribal members by accompanying them to field office appointments.
- 5) Actively supported the OMB Workgroup to finalize deliverables for the Native Language Memorandum of Agreement with 24 Federal agencies, a 10-year action plan supporting an *All of Government* approach, scheduled for release in November 2023.

V. Strategies to Advance Equity in FY 2024

Strategy #1: Improve Access to the Supplemental Security Income Program for Women, Families, Individuals from Underserved Communities, and Other People Facing Barriers.

Whole-of-Government Equity Objective(s): Economic Justice and Income Security

Collaborating Agencies: N/A

Barriers to Equity: Eligibility for the SSI program provides access to multiple Federal and State assistance programs. The complexity of our SSI program—driven in part by legislative, regulatory, and sub-regulatory requirements—can create burdens for program applicants and recipients, and our front-line employees who help claimants understand our programs and complete forms. Some of our customers cannot conduct business with us online due to limited access to technology, housing insecurity, lack of credit history, or difficulty understanding the procedures to establish an online account.

We are incorporating CX research practices into SSI accessibility and simplification to address the barriers for the public caused by complexity. For example, our analysis of the initial disability journey included several discussions with advocates and interviews with people from a wide variety of backgrounds. Through this approach we obtained input on complexities and pain points experienced by the public, which often led to challenges for employees. We are using public and employee input on complexities and pain points to design solutions.

Many barriers are interconnected for families and individuals with limited resources. For example, our research has indicated that:

- Applicants, especially those experiencing homelessness and those with low incomes, could not complete an internet application due to a lack of internet connection and experienced other challenges contacting us by telephone or visiting our field offices.
- Applicants with limited or no English proficiency could not complete the internet application due to a lack of language translation. Many of those who completed an internet application did so with assistance from family members or advocates. Often, these applicants experienced delays scheduling application interviews and medical examinations due to challenges obtaining interpreter services, including interpreter services being unavailable in certain regions.
- If an individual does not have a stable address, they may not receive important notices from SSA. Unreliable transportation can prevent individuals from traveling to field offices to receive the information in-person.
- Obtaining assistance online is also a challenge due to the secured authentication processes we use, which requests information regarding past housing, credit history, and employment to verify identity.

To better address the administrative burdens facing our applicants and employees, we are taking actions to reduce the length and complexity of the SSI application and the administrative process.

Evidence Base to Support Strategy:

- Although 80 percent of successful SSI internet applications were submitted on a smartphone, the internet application was challenging to navigate on mobile devices.
- Stakeholders provided significant feedback on the complexity of the SSI application process through our "Always On" survey, focus groups with beneficiaries, and the Disability Journey Team data collection efforts.
- Compared to men SSI recipients, women SSI recipients are more likely to be heads of households and receiving disability benefits, over 65, or relying on SSI for over 50 percent of their total income.¹⁷ In this sense, women are more heavily relying on assistance from SSA than men.

Actions to Achieve Equity:

To address barriers to accessing SSI, we will:

- Simplify the process for applying for SSI.
- Complete the Beyond Benefits Study, which explores the barriers to accessing community services to aid the return to self-sufficiency after disability benefits cease.
- Conduct SSI outreach including stakeholder listening sessions, marketing of program updates, and informing the public about policy updates that affect underserved communities.
- Centralize representative referral lists to ensure applicants have options to seek representation by an attorney or non-attorney representative.
- Continue to reach out to unrepresented claimants to prepare them for the hearing process and explain their right to representation.
- Using CX research practices, learn from our employees about their experiences with working with claimants as they apply to the disability programs.
- Develop, market, and assess effectiveness of informative materials, including priority language translations, to educate the public and other stakeholders on SSI eligibility and the application process.
- Complete our regulatory agenda¹⁸ to simplify SSI, particularly our In-Kind Support and Maintenance (ISM) policies. Under current policy, ISM refers to reported or estimated assistance with food and/or shelter provided to SSI claimants from others within or outside their households. We determine claimants' eligibility for and amount of SSI payments, partially based on the amount of ISM they receive. Simplifying ISM policies will make the SSI program easier for the public to understand and less burdensome for us to administer, and reduce the potential for improper payments.
 - Omitting Food from ISM Calculation: Removes food from the calculation of ISM. Food assistance received from others will no longer impact claimants' benefit eligibility and amount. (NPRM. Feb. 15, 2023. [88 FR 9779](#).)
 - Expansion of the Rental Subsidy Policy for SSI Applicants and Recipients: Expands rental subsidy exemption currently applicable in seven States nationwide, exempting claimants from ISM from other household members if they pay at least one third of the SSI benefit on rent. (NPRM. Aug. 24, 2023. [88 FR 57910](#).)
 - Expand the Definition of a Public Assistance (PA) Household: Adds Supplemental Nutrition Assistance Program to the list of means-tested programs included in our definition of PA households; if every household member receives at least one of the specified types of assistance, we would not reduce SSI benefits due to ISM or deeming from other household members. (NPRM. Sept. 29, 2023. [88 FR 67148](#).)

Proposed Metrics:Near- to Medium-Term

- Track increased engagement of new and diverse stakeholders via scheduled listening sessions by end of FY 2024.
- Track outreach and stakeholder engagement in the regions and headquarters to assess the effectiveness of communications by end of FY 2024.

Longer-Term

- Implement a mobile-friendly streamlined application process to improve self-service online.
- Decrease recontacting applicants to obtain required data to complete and process their applications.

Public Participation and Community Engagement:

Engaging with communities to provide opportunities for public participation and receive feedback is vital to our SSI accessibility efforts. As part of our human-centered design approach for the disability journey team, we will use survey and customer interviews to seek feedback from populations facing barriers, including people experiencing homelessness and non-English speakers. Additionally, to inform our research, we will conduct real-time observations of those applying for disability benefits online to determine pain points and solicit recommendations for improvement.

We will invite community advocates and stakeholders to participate in advocate meetings, including meetings on SSI Simplification, to demonstrate online capabilities and obtain feedback for improvement. Finally, to enhance the trust and community partnership, we will host Listening Sessions when agency leaders travel to our field offices to hear directly from people most impacted by our services and programs.

Strategy #2: Improve Equity in Access to Our Programs for Our Customers Who Communicate Primarily in Languages Other than English.

Whole-of-Government Equity Objective(s): Civil Rights & Economic Justice

Collaborating Agencies: Department of Justice (DOJ)

Barriers to Equity: Navigating our processes can be economically, socially, and culturally challenging due to complexities in the application process. Many applicants with limited English proficiency, may have difficulty answering questions leading to incomplete applications and technical denials. Language barriers may also lead to miscommunication between people with limited English proficiency and our staff who serve them, reducing customer service quality, and decreasing customer satisfaction.

Additionally, language barriers may lead to:

- Limited knowledge of programs and benefits,
- Limited access to interpreter services, and
- Miscommunication between applicants/recipients and our staff.

For example, an American Indian or Alaska Native who may not speak English as a primary language may have a barrier to understanding the complex policy for Social Security or SSI benefits. There are many words in English that do not have precise translations in Native Languages, especially for legal or technical terms. This

applicant, like many applicants who may not be English proficient, may have difficulty answering questions and completing an application.

We work to remove barriers to services and benefits for individuals with LEP by identifying customers with LEP and taking appropriate action to provide meaningful access, in their preferred language, to understand and feel confident in how to apply for our programs and services. We will increase availability of translated materials and the number of languages in which those materials are offered, improve access to language interpretation services, and increase culturally attuned outreach to Native American and Alaska Native, LEP, and migrant communities. We will also introduce to agency employees SSA's first global Limited English Proficiency policy and revised Language Access Plan.

Evidence Base to Support Strategy:

- For FYs 2018 through 2022, we received over 4.5 million requests through the Telephone Interpreter Services (TIS) for 194 languages.
 - During that time, about 80 percent of the language requests were for Spanish, Vietnamese, Mandarin, Cantonese, and Russian.
 - For FYs 2018 through 2022, there were 20 languages that were often requested through our TIS that we were not able to provide.
- Nearly one in four American Indians and Alaska Natives have LEP or speak a language other than English at home.¹⁹ For FYs 2018 through 2022, we received more requests for Navajo language than for German language assistance through the TIS. While two of our offices near the Navajo Reservation have employees who are proficient in Navajo language, we need TIS to provide service outside of this area.
- Through our Office of Native American Partnerships, we receive ongoing feedback from advocates in Tribal communities. Their recommendations to overcome complex applications and language barriers include:
 - Assistance from Tribal Benefit Coordinators who understand the native language sufficiently to assist applicants.
 - Assistance from a member from the Tribe, who understands the native language and Tribal health documentation sufficiently, in the absence of an Indian Health Service Coordinator to assist applicants.
 - Outreach to inform Alaskan applicants that interpreter services may help them overcome barriers and improve application outcomes. This recommendation is based on research provided during the White House 10th Annual Native Language Summit in Albuquerque, NM.
- Through our LEP Steering Committee, we receive ongoing feedback and recommendations from advocates about ways to improve language access, analyze these recommendations, and take appropriate action, such as, reminding employees on how to use the TIS.
- As of July 2023, we have over 3,400 employees who were hired to work and communicate in more than one language.

Actions to Achieve Equity:

To address language-related barriers, we will:

- Improve language access by providing printed and online translated materials, language interpretation services, and culturally competent assistance throughout our administrative processes, for applicants to complete an application, file an appeal, and manage their benefits.
- Translate publications in multiple languages prioritized by need or population size.
- Improve stakeholder awareness of the process to request free interpreter services, in advance of an appointment (e.g., during a claim, scheduled hearing).
- Expand the Agency Language Access Plan to include more Native and other languages to provide a wider range of populations assistance with our administrative processes.
- Increase the usage of our free TIS and language preference requests.
- Maintain ongoing communications with stakeholders and the advocate community to help us identify ways to improve access to our services for people with LEP.
- Train our employees and interpreters on how best to support our customers requesting interpreter services.
- Improve our use of relevant LEP data by language, location, and age to ensure we are aware of and can work to address any difficulties in supporting language access in specific regions or local field offices.
- Explore policy, processes, and procedures to collect, update, validate and analyze data regarding multilingual employees, and consider necessary long-term resource implications.
- Host advocate engagements to gather feedback and recommendations from the public.

Proposed Metrics:

- Near- to Medium-Term
- Create a system to track usage of translated online and field office resources and material (e.g., publications, fact sheets, field office signage, and form instructions) by the end of FY 2024.
- Establish benchmarking to determine resources and materials required to introduce new language publications to the [Multi-Language Gateway](#) by end of FY 2024. Currently, we offer translated publications in 18 languages.
- Establish benchmarking on the current use of free interpreter services and measure improvements in public awareness via increased usage of free interpreter services by end of FY 2024.
- Annually track the usage of language preference when requesting our free TIS.
- Annually track requests for publications in languages other than the current 18 languages in which SSA provides translated publications.
- Collect, track, and analyze the usage of updated publications (e.g., including cultural nuance, simplifying technical jargon) via website downloads by the end of FY 2024.
- Enhance our Multi-language Gateway resources, through benchmarking with other agencies, usability testing, and data analysis by end of FY 2024.
- Release a customer service survey to customers using our interpreter services to gauge the usage and effectiveness of our interpreter services by end of FY 2024.

Longer-Term

- Evaluate the length of time and resources to translate training for Customer Representatives in another language. Use this methodology to increase training in new language(s) annually.
- Study whether changes in translated publications make a difference in accessing interpretation service.
- Track data on the usage of and engagement with the Multi-language Gateway site to improve website navigation, simplify content, and provide greater access to LEP communities.
- Track the number of multilingual employees and the languages spoken to evaluate whether we are meeting the needs of SSA customers.
- Survey and analyze customer service measures for our LEP and non-LEP customers.

Public Participation and Community Engagement:

To ensure language does not pose a barrier to apply for benefits and access our services, we will implement strategies that will support communities who need language access and translation services. We will engage in Tribal Consultations and Listening Sessions held in person and virtually to build partnerships with local Tribal community organizations. In addition, we will collaborate with the White House Task Force on New Americans, the White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders, and the Multilingual Community of Practice, to learn from and understand the different needs in different communities. We will further publicize our interpreter services via fact sheets, blog posts, and media engagement. We will also survey our Regional Communications Directors for input on our language resources.

Strategy #3: Reduce Pending SSI Underpayments to Improve Equity in the Delivery of Payments to Our Customers Disproportionately Affected by Poverty.

Whole-of-Government Equity Objective(s): Economic Justice

Collaborating Agencies: N/A

Barriers to Equity: Today, approximately 7.4 million²⁰ people living in the U.S. receive SSI and count on us to provide accurate and timely payments. Complexity in the SSI program can cause payment errors that may adversely affect the economic security of people receiving SSI payments. In FY 2022, we reported \$680 million²¹ in underpayments stemming from the following situations:

- In initial claim situations, underpayments stem from benefits that are due back to the date of onset²², the first day a claimant meets the definition of disability or statutory blindness. Once an initial claim is approved, the person receiving SSI is paid back to the date of their application or the date of onset if they meet the definition of disability or statutory blindness after they submit their application. These past-due benefits are considered underpayments and may be subject to installments.
- In post-entitlement situations, underpayments are generally the result of reporting delays. For example, people receiving SSI payments are required to timely report any changes in their medical or non-medical (i.e., income, resources, or living arrangements) circumstances that may impact their payments. When a person receiving SSI payments does not timely report changes that will affect their payment amount, the field office will update the record noting a discrepancy, which may cause an underpayment.
- If an underpayment exceeds three times the Federal Benefit Rate, the payment due to the recipient is subject to installments.²³

Additional barriers and challenges include:

- Requiring payees to open a separate dedicated account for children to receive SSI underpayments. These accounts have rules and requirements that are challenging for most underserved communities (e.g., unbanked communities), and the development inadvertently creates a time tax on our customers and field offices.
- Requirements such as having two forms of identification and issues related to unpaid negative balance on closed accounts or overdraft fees may prevent someone receiving SSI payments from opening a new bank account.
- Lack of trained staff to keep up with the pace of incoming initial claims delays determinations and timely benefits.

Processing our system's underpayment alerts typically result in technician review and the manual release of payments due to people receiving SSI. To improve equity in the SSI program, we will increase underpayment processing of our cases identified as highest priority cases or those pending for a year or more at the beginning of FY 2024. We will identify priority cases as a subset of all pending SSI underpayments which require additional internal review or include a pending payment to representative payees of children. These priority cases will likely fall into one of the following underpayment categories: dedicated accounts with pending payments on a current or prior record, uncashed checks, pending payments over \$5,000, and pending payments on a prior record including potential payments to an authorized representative.

Evidence Base to Support Strategy:

- As of August 23, 2023, there were about 220,000 pending underpayments, of which more than 140,000 underpayments (with corresponding alerts) have been pending for a year or more or are priority cases.
- Our data show that nearly 86,000 recipients identified as having underpayments are children with dedicated accounts²⁴ for past due payments. In 2022, 997,109 SSI recipients were children.²⁵
- Our data show approximately 40,000 women aged 18 to 64, and 9,000 women aged 65 and older, have underpayments.²⁶

Actions to Achieve Equity:

To address underpayment-related barriers, we will:

- Assess the root causes of improper payments and improve payment accuracy for overpayments and underpayments.
- Establish a dashboard to identify demographic information of customers most affected by underpayments.
- Prioritize releasing underpayments with more than \$5,000 on the record.
- Prioritize processing cases involving an SSI underpayment and non-medical redeterminations or limited issues.
- Provide processing reminders to staff who are responsible for completing underpayments involving dedicated accounts for past due benefits.
- Develop training materials to showcase tools for monitoring and developing underpayment alerts.

- Improve the use of technology and management information to prevent underpayments, streamline the processing of underpayments, and support other enhancements to SSI case processing.
- Develop informative materials, including priority language translations, to educate community-based organizations on the SSI claims development process and how to assist with maintaining current customer contact information.
- Develop a new method to identify, monitor, and enforce the processing of aged and priority underpayments by September 30, 2024.
- Complete, by September 30, 2025, 98 percent of nearly 152,500 SSI underpayments that were pending for a year or more, or considered priority cases, at the beginning of FY 2024.
- Complete, by September 30, 2025, at least 77 percent of all SSI underpayments, an increase from 75 percent, which is the average completion rate for FYs 2019–2022.

Proposed Metrics:

Near- to Medium-Term

- Evaluate data dashboard to identify demographic information of customers most affected by underpayments by September 30, 2024.
- Track internal reminders and dissemination of training materials to staff for monitoring and developing underpayment alerts by September 30, 2024.
- Track outreach and stakeholder engagement to baseline effectiveness of communications by September 30, 2024.

Longer-Term

- By September 30, 2025, complete 98 percent of SSI underpayments that have been identified as priority cases or pending for a year or more at the beginning of FY 2024.
- Process remaining percent of the initial list of priority cases by September 30, 2025.
- Increased public awareness of SSI claims development process and improvement of current customer contact information.
- Beginning in FY 2026, maintain strategies to identify and process underpayments to reduce aged underpayments in SSI and OASDI programs.

Public Participation and Community Engagement:

We will collaborate with community-based organizations and our stakeholder network to increase awareness of actions we are taking to deliver unpaid benefits to people receiving SSI with pending underpayments. We will work with our Regional Communication Directors to develop localized strategies for communicating about our efforts to resolve underpayments and what our customers can do to ensure they are receiving accurate payments. We will enlist the help of our Customer Experience team to understand the pain points people face and request feedback on any complaints about receiving an underpayment. We will provide our local offices more information about how to best contact communities disproportionately impacted by underpayments and analyze our data to inform our efforts to improve our services.

Strategy #4: Increase Awareness of Survivors Benefits Eligibility for Children and Families, Same-Sex Couples, and People Disproportionately Impacted by COVID-19.

Whole-of-Government Equity Objective(s): Economic Justice and Income Security

Collaborating Agencies: N/A

Barriers to Equity: The loss of a family member who contributed to the household income can be devastating both emotionally and financially. Social Security helps by providing survivors benefits for eligible families. Social Security survivors benefits are paid to the widowed, including same-sex and divorced spouses, and the dependents of eligible workers.

Applying for survivors benefits is a straightforward process. However, barriers to survivors benefits for undeserved individuals usually involve:

- Lack of awareness of eligibility requirements by surviving spouses and divorced spouses.
- Lack of awareness of eligibility requirements by same-sex couples due to policy changes after *Ely*²⁷ and *Thornton*²⁸ litigation.
- Lack of awareness of eligibility requirements when surviving children live with guardians.
- Lack of culturally relevant information for LEP communities.
- Delays in obtaining death reports for benefits that require proof of death.

We aim to develop a targeted outreach strategy, including priority language translations. We will increase awareness of eligibility requirements to the following communities:

- Surviving spouses and divorced spouses,
- Same-sex couples,
- Guardians of surviving children,
- LEP communities, and
- Populations who were overrepresented in higher COVID-19 mortality rates, including Black, Latino, and American Indian and Alaska Native communities.

Evidence Base to Support Strategy:

- Disproportionately, White spouses with disabilities on average are more likely to receive survivor benefits compared to other racial groups, according to our data.^{29, 30} For people who have disabilities and lost a spouse to death, and receive survivors benefits, about 60 to 80 percent are White, nine to 25 percent are Black, 10 to 20 percent are Other, and less than 10 percent are Unknown. We are working to understand the driving factors and how we can ensure equitable access to our programs.
- There are approximately 980,000 same-sex couple households in the United States.³¹ We are conducting proactive outreach to help same-sex couples that were previously denied spousal survivor benefits.
- At the beginning of the pandemic, Black, Latino, and American Indian and Alaska Native people were disproportionately represented in COVID 19-associated deaths.³² For example, in the summer of 2021, the CDC found that American Indian and Alaska Native people died from COVID-19 at a rate 2.8 times higher than same-age White people.³³

Actions to Achieve Equity:

To address barriers to accessing survivors benefits, we will:

- Audit existing public information, including webpages, and revise materials using plain language to make the eligibility requirements clear and inclusive for women, same-sex couples and families; people from underserved communities; and others who access public benefits.
- Develop and enact a stakeholder outreach strategy to increase public understanding of survivors benefits, including among Black, Latino, and American Indian and Alaska Native communities that are disproportionately represented in higher mortality rates.
- Revise and publish online information on criteria for benefit entitlement to incorporate cultural nuance and reduce technical jargon.
- Design a culturally sensitive Tribal-focused Benefits Guide and training for the Indian Health Service (IHS) Tribal Benefit Coordinators.
- Provide a face-to-face presentation at the National Indian Council on Aging Elders Conference educating nearly 2,000 Tribal elders annually.
- Explore ways to simplify the process of accessing and applying for our benefits.
- Identify proactive ways to notify people about their entitlement to survivor benefits and provide them information to access our services in our initial communications.

Proposed Metrics:

Near- to Medium-Term

- Track public engagement through our Communications Outreach Activity Reporting System by end of FY 2024.
- Track the streamlining of webpages to our updated website by end of FY 2024.
- Track engagement of publications we update to remove jargon by end of FY 2024.
- Track beneficiaries by demographic characteristics (e.g., gender, race, income) by end of FY 2024.
- Track feedback and engagement from IHS Tribal Benefit Coordinators who engage in SSA training with a focus on retirement and survivors benefits, with a breakdown by claims involving and not involving COVID-19 by end of FY 2024.

Longer-Term

- Identify additional third parties to provide annual SSA benefits training by working with the IHS, and navigators in Black, Latino, and LGBTQIA+ communities.
- Publish a Tribal Benefits Coordinator Guide highlighting survivors benefits.
- Track annual presentations on survivors benefits eligibility criteria.
- Measure increases in survivor benefits applications by demographic characteristics (e.g., gender, race, income).

Public Participation and Community Engagement:

We will collaborate with community-based organizations to increase awareness of survivors benefits and foster stronger partnerships for community engagement by adding more diverse groups and grassroots organizations to our stakeholder listserv. To increase engagement with stakeholders and build community

trust, we will meet with widowed spouses, survivors, and communities of color. Additionally, we plan to hold regular Tribal Listening sessions with Tribal community-based organizations throughout the year. We will work with our LGBTQIA+ stakeholder network to continue outreach on our updates to survivors benefits policy for same-sex couples.

Strategy #5: Increase Race and Ethnicity Data Collection to Further Identify, Monitor, and Address Service Inequities.

Whole-of-Government Equity Objective(s): Civil Rights: Identifying inequities in our programs and services based on protected classes.

Collaborating Agencies: N/A

Barriers to Equity: Incomplete demographic data in our records can hamper our ability to determine whether our programs are equitably serving our applicants and beneficiaries.³⁴ In 1987, we started the Enumeration at Birth (EAB) process with States as an efficient way for parents to obtain an SSN for a newborn during the birth registration process. This convenient option allows parents to obtain an SSN without having to visit a local Social Security field office or Card Center. However, unlike the standard SSN application, the current EAB process does not collect voluntarily race and ethnicity data. Today, almost all new SSNs are processed through EAB. In FY 2022, EAB accounted for 99 percent of SSNs issued for children under the age of one. The increase in assigning SSNs through EAB led to an unintended 30 plus year period of incomplete voluntary collection of race and ethnicity data in our records.³⁵

Closing this data gap will help us determine whether different groups are underrepresented in our programs, provide insight into which programs are particularly important to different communities, and help us examine variability in program participation and benefit levels based on demographic makeup. Collecting and analyzing demographic data provides greater insight into developing potential solutions that will identify and correct potential inequities in access to our programs and improve service delivery to the diverse groups of people we serve.

Evidence Base to Support Strategy:

- As the share of SSNs assigned by EAB grew, the portion of our agency records that include race and ethnicity data decreased. By 2010, this diminishing data availability contributed to statistical accuracy concerns, resulting in the removal of statistics by race from our publications. For more details, see [*"Why Researchers Now Rely on Surveys for Race Data on OASDI and SSI Programs: A Comparison of Four Major Surveys."*](#)³⁶
- We resumed publishing statistics by race in 2022, at stakeholder request, though we have concerns about our incomplete data.³⁷ We are exploring ways to improve data quality and use.

Actions to Achieve Equity:

To address barriers caused by lack of complete demographic data, we will:

- Increase voluntary data collection through the SSN Application (SS-5) to further identify, monitor, and address service inequities to the populations we serve.
- Track the voluntary collection of race and ethnicity data in the Demographic Tracking Dashboard to inform collection strategies.
- Partner with States to increase collection of race and ethnicity data in the EAB process for research and statistical purposes.
- Update the SSN application (SS-5) and other collection processes, to reflect the 2024 update of OMB's 1997 Statistical Policy Directive No. 15 (SPD 15): Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.

Proposed Metrics:

Near- to Medium-Term

- Annually publish research and analysis statistics detailing the demographic makeup of our program populations to examine inequities in program participation.
- Increase the number of States that are under contract to include race and ethnicity data collection capability through EAB from 1 to 5 by the end of FY 2024.

Longer-Term

- Operationalize statistical demographic data to inform administrative decisions to remove administrative burdens and enhance customer experience.
- Increase and track the number of States and jurisdictions that will collect and share race and ethnicity data through EAB with the agency and analyze the percentage increase in the race and ethnicity data we have in our records.
- Increase the *under age 30* share of total living SSN holders for whom we have race and ethnicity data from 8 percent to 15 percent by FY 2027.

Public Participation and Community Engagement:

We will convene with research and government experts on ways to improve our voluntary collection of demographic information. Additionally, we will produce public information materials (e.g., Dear Colleague letter, fact sheet, and social media postings), in multiple languages, about this effort and why sharing voluntary data is important to equitable outcomes. We will share these materials with our stakeholders to promote this effort within their constituencies.

Specifically, for EAB, we will produce public information materials that could be used by healthcare workers involved in the EAB process to leverage these individuals as advocates for collection efforts. Lastly, we will create opportunities to work with States to better understand the efforts to collect demographic data at birth and support this initiative.

VI. Endnotes

We provide references throughout this document to support the SSA Equity Action Plan FY 2023 Update. Note that links to references provided were current at the time of publication, and sources may have updated information and/or URLs since publication.

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- ¹ SSA. *FY 23 Equity Action Plan*. Available at, <https://www.ssa.gov/open/materials/SSA-EO-13985-Equity-Action-Plan.pdf>
- ² LGBTQIA+ is an abbreviation for lesbian, gay, bisexual, transgender, queer or questioning, intersex, asexual, and more. These terms are used to describe a person's sexual orientation or gender identity. Available at, <https://gaycenter.org/community/lgbtq/>.
- ³ SSA. *Racial Equity Research, Statistics, and Data Resources*. Available at, <https://www.ssa.gov/policy/about/racial-equity-resources.html>.
- ⁴ SSA (2023, November). *SSI Monthly Statistics*. Available at, https://www.ssa.gov/policy/docs/statcomps/ssi_monthly/2023-11/table01.html.
- ⁵ CDC (2020). *Health equity considerations and racial and ethnic minority groups*. Atlanta, GA: US Department of Health and Human Services. Available at, <https://stacks.cdc.gov/view/cdc/91049>.
- ⁶ Millett GA, Jones AT, Benkeser D, et al. *Assessing differential impacts of COVID-19 on black communities*. *Ann Epidemiol*. Available at, <https://www.sciencedirect.com/science/article/pii/S1047279720301769>.
- ⁷ National Institutes of Health (2021). *NCI study highlights pandemic's disproportionate impact on Black, American Indian/Alaska Native, and Latino adults*. News Release. Available at, <https://www.nih.gov/news-events/news-releases/nci-study-highlights-pandemics-disproportionate-impact-black-american-indian-alaska-native-latino-adults>.
- ⁸ Enumeration at Birth (EAB) process with States is an efficient way for parents to obtain an SSN for a newborn during the birth registration process.
- ⁹ We define "underserved communities" as ZIP codes with a 30 percent or more decline in SSI applications between FY 2019 and FY 2021 and either includes a majority of people of color and/or majority of people living at 150 percent or less of the Federal poverty threshold.
- ¹⁰ A protective filing date is the date that you initially notify the Social Security Administration (SSA) of an intention to apply for benefits. It can be the date you formally file the application, but it can also be established by a prior written or verbal contact by phone, by mail, in person or online. The protective filing date serves as the application filing date for purposes of paying benefits. See SSA Program Operations Manual System, <https://secure.ssa.gov/poms.nsf/lnx/0200204007>.
- ¹¹ SSA. *What You Need To Know About Your Supplemental Security Income (SSI) When You Turn 18*. Available at, <https://www.ssa.gov/pubs/EN-05-11005.pdf>.
- ¹² SSA Regulatory Agenda. Available at, https://www.reginfo.gov/public/do/eAgendaMain?operation=OPERATION_GET_AGENCY_RULE_LIST¤tPub=true&agencyCode=&showStage=active&agencyCd=0960&csrf_token=658DD4794FA07AB6BC7441822FECE5065951E36836E75213B047ACB2F0F13DE8B13981D6794EF94B20891882FE03AE69B4C0.
- ¹³ National Center for Education Statistics (2007, November). *Characteristics of Minority-Serving Institutions and Minority Undergraduates Enrolled in These Institution*. Institutions were classified as minority-serving (MSIs) based on either one of two separate criteria: legislation or the percentage of minority student enrollment. SSA is moving away from using the term minority and will reference MSIs as Institutions Serving Students of Color. Available at, <https://nces.ed.gov/pubs2008/2008156.pdf>.
- ¹⁴ This action is also pursuant to EO 14031 (Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders), EO 14041 (White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity Through Historically Black Colleges and Universities), EO 14045 (White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity for Hispanics, and EO 14050 (White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity for Black Americans). Available at <https://www.federalregister.gov/documents/2021/06/03/2021-11792/advancing-equity-justice-and-opportunity-for-asian-americans-native-hawaiians-and-pacific-islanders>, <https://www.federalregister.gov/documents/2021/09/09/2021-19579/white-house-initiative-on-advancing-educational-equity>

- [excellence-and-economic-opportunity-through](https://www.federalregister.gov/documents/2021/09/16/2021-20165/white-house-initiative-on-advancing-educational-equity-excellence-and-economic-opportunity-for), <https://www.federalregister.gov/documents/2021/10/22/2021-23224/white-house-initiative-on-advancing-educational-equity-excellence-and-economic-opportunity-for-black>, respectively.
- ¹⁵ U.S. Department of Homeland Security. *Public Charge Ground of Inadmissibility*. Available at, <https://www.federalregister.gov/documents/2022/09/09/2022-18867/public-charge-ground-of-inadmissibility>.
- ¹⁶ SSA. *Social Security Numbers for Noncitizens*. Available at, <http://www.ssa.gov/pubs/EN-05-10096.pdf>.
- ¹⁷ SSA. *Characteristics of Noninstitutionalized DI, SSI, and OASI Program Participants, 2016 Update*. Available at, <https://www.ssa.gov/policy/docs/rsnotes/rsn2022-01.html>.
- ¹⁸ SSA Regulatory Agenda. Available at, https://www.reginfo.gov/public/do/eAgendaMain?operation=OPERATION_GET_AGENCY_RULE_LIST¤tPub=true&agencyCode=&showStage=active&agencyCd=0960&csrf_token=658DD4794FA07AB6BC7441822FECE5065951E36836E75213B047ACB2F0F13DE8B13981D6794EF94B20891882FE03AE69B4C0.
- ¹⁹ U.S. Department of Health and Human Services - The Office of Minority Health. *Minority Population Profile: American Indian/Alaska Native*. Available at, <https://www.minorityhealth.hhs.gov/omh/browse.aspx?lvl=3&lvlid=62>.
- ²⁰ SSA (2023, November). *SSI Monthly Statistics*. Available at, https://www.ssa.gov/policy/docs/statcomps/ssi_monthly/2023-11/table01.html.
- ²¹ SSA. *Fiscal Year 2022 Title XVI Payment Accuracy Report*. Available at, https://oqr.ba.ad.ssa.gov/files/oqr/reports/FY22_Title_XVI_Payment_Accuracy_Report_0.pdf.
- ²² See SSA Program Operations Manual System for an *Overview of Onset Policy*. Available at, <http://policy.ssa.gov/poms.nsf/lnx/0425501200>.
- ²³ See SSA Program Operations Manual System for *SI 02101.020 Large Past-Due Supplemental Security Income Payments by Installments – Individual Alive*. Available at, <https://secure.ssa.gov/poms.nsf/lnx/0502101020>.
- ²⁴ A dedicated account is a separate financial institution account that the representative payee of a disabled child under age 18 is required to open, when the child is eligible for large past-due payments (usually any payment covering more than six months at the current benefit rate).
- ²⁵ SSA (2023, August). *Fast Facts & Figures About Social Security, 2023*. Available at, https://www.ssa.gov/policy/docs/chartbooks/fast_facts/2023/fast_facts23.pdf.
- ²⁶ SSA (2023, August). *Fast Facts & Figures About Social Security, 2023*. Available at, https://www.ssa.gov/policy/docs/chartbooks/fast_facts/2023/fast_facts23.pdf.
- ²⁷ SSA. *Notice of Class Action Order: Ely v. Saul*. Available at, <https://www.ssa.gov/ely/>.
- ²⁸ SSA. *Notice Of Class Action Order: Thornton V. Commissioner Of Social Security*. Available at, <https://www.ssa.gov/thornton/>.
- ²⁹ The Social Security Administration recognizes the importance of identifying and addressing systemic inequities relating to race and ethnicity in the programs it administers. Reporting program-related statistics by race is a critical step toward fulfilling that objective. The tables in this expanded section respond to that imperative; however, the concerns about the collection of data by race still apply. Those concerns are summarized in “Why Researchers Now Rely on Surveys for Race Data on OASDI and SSI Programs: A Comparison of Four Major Surveys.” Available at, <https://www.ssa.gov/policy/docs/rsnotes/rsn2016-01.html>.
- ³⁰ For people who either or both have disabilities and lost a spouse to death, and receive survivors benefits, about 60 to 80 percent are White, nine to 25 percent are Black, 10 to 20 percent are Other, and less than 10 percent are Unknown. Social Security Administration (2023, August). *Annual Statistical Supplement, Summary Expanded by Race, 2023*. Available at, <https://www.ssa.gov/policy/docs/statcomps/supplement/2023/5a-expanded.html>.

- ³¹ Walker, L., & Taylor, D. (2021). *Same-Sex Couple Households: 2019. American Community Survey Briefs*, U.S. Census Bureau (February 2021). Available at, <https://www.census.gov/library/publications/2021/acs/acsbr-005.html>.
- ³² U.S. Government Accountability Office (2021). *Racial and Ethnic Health Disparities—Before and During the Pandemic*. Available at, <https://www.gao.gov/blog/racial-and-ethnic-health-disparities-and-during-pandemic>.
- ³³ For people who either or both have disabilities and lost a spouse to death, and receive survivors benefits, about 60 to 80 percent are White, nine to 25 percent are Black, 10 to 20 percent are Other, and less than 10 percent are Unknown. Social Security Administration (2023, August). *Annual Statistical Supplement, Summary Expanded by Race, 2023*. Available at, <https://www.ssa.gov/policy/docs/statcomps/supplement/2023/5a-expanded.html>.
- ³⁴ SSA. *SSA Equity Action Plan*. Available at, <https://www.ssa.gov/open/materials/SSA-EO-13985-Equity-Action-Plan.pdf>.
- ³⁵ SSA. *Factors Underlying the Concerns About Race Data*. Available at, <https://www.ssa.gov/policy/docs/statcomps/supplement/2022/apne.html>.
- ³⁶ SSA. *Why Researchers Now Rely on Surveys for Race Data on OASDI and SSI Programs: A Comparison of Four Major Surveys*. Available at <https://www.ssa.gov/policy/docs/rsnotes/rsn2016-01.html>.
- ³⁷ SSA. See Appendix E: Selected Statistics on OASDI Benefits in Current-Payment Status by Race. Available at, <https://www.ssa.gov/policy/docs/statcomps/supplement/2022/apne.html>.