April 21, 2020

The Honorable Steven T. Mnuchin
Secretary of Treasury
16 US Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

The Honorable Andrew Saul
Commissioner of Social Security Administration
US Social Security Administration
1300 D Street SW
Washington, DC 20024

The Honorable Robert Wilkie
Secretary of Veterans Affairs
US Department of Veterans Affairs
810 Vermont Avenue NW
Washington, DC 20571

Dear Secretary Mnuchin, Commissioner Saul, and Secretary Wilkie:

The undersigned cochairs of the Consortium for Citizens with Disabilities (CCD) Social Security Task Force write in response to your recently announced deadline for Social Security beneficiaries to file taxes or utilize the new web tool to claim economic impact payments for child dependents under the age of 17 or wait until 2021 to claim the payments. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. We represent the parents with disabilities receiving Social Security Disability Insurance who must now meet this deadline, along with the disabled widows and widowers with children and the retiree grandparents who have disabilities or have adopted grandchildren with disabilities.

We are extremely concerned by the unexpected announcement of this very short deadline. Announcing a Wednesday deadline on a Monday afternoon is simply put, not enough time. Media reports that the deadline is noon on Wednesday (with the time zone unspecified) add to the urgency and the confusion. The new non-filers web tool only became available on April 10, less than two weeks ago. Reports to our organizations have made it clear that the web tool is not usable via most cell phones and that it is not compatible with some screen-reader programs used by people who are blind or have visual impairments. The web tool is also an internet-only solution that has not taken into account the needs of people who do not have regular access to the internet.
(a problem compounded by stay-at-home orders and closures of public libraries). As we raised in our prior letter, there is significant confusion as to how the web tool works for those who do not have bank accounts, do not have account information and routing numbers readily available, or who prefer a paper check or a deposit to a Direct Express card. The Get My Payment tool, also recently released on April 17, does not allow Social Security beneficiaries to check their status, meaning that none of the individuals who are required to submit the information by Wednesday at noon can verify if their information is correctly entered or received by Treasury. By setting such a short deadline and providing insufficient web tools, Treasury and the other agencies are failing people with disabilities, their children, and other Social Security beneficiaries with eligible children. We urge the Agencies to eliminate this deadline and make payments on a rolling basis as information is submitted to the web tool.

We understand and support the agencies’ desire to issue Economic Impact Payments as quickly as possible, but this solution does not take into account the serious outreach efforts that are necessary to reach these populations. As we have pointed out in prior letters, efforts to reach Social Security, SSI, and VA Disability Compensation and Veterans Pension beneficiaries in 2008 when the IRS last issued economic stimulus payments faced major challenges and left out 17 percent of beneficiaries. The issues we identified in our prior letter continue to be challenges, including lack of internet access, physical and electronic accessibility issues, and legally required reasonable accommodations and assistance for people with disabilities in understanding what is required. The Agencies must undertake outreach to these populations and create options for them. To balance this need with the need to issue payments quickly, we also urge the Agencies to adopt several deadlines that allow individuals to submit their information over the course of the year and be paid as these deadlines pass. By creating a system that requires action within the next 48 hours or forces families to wait until 2021, the Agencies are failing to reflect Congressional intent of these payments: to assist people in getting through this moment of crisis and allow them to stimulate the economy.

Thank you for your consideration of this important issue for Social Security, SSI, VA Disability Compensation, and Veterans Pension beneficiaries. The United States is currently in an unprecedented time and we must all work together to accommodate all persons. We stand ready to work with you to find solutions to this vital issue. Please do not hesitate to contact Bethany Lilly (lilly@theArc.org) or Stacy Cloyd (stacy.cloyd@nosscr.org) with any questions or to arrange for a meeting.

Sincerely,

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