



**CONSORTIUM FOR CITIZENS  
WITH DISABILITIES**

President Joe Biden  
The White House  
Washington, DC

April 14, 2021

The undersigned members of the Consortium for Citizens with Disabilities (CCD) Paid Leave Task Force write to express our strong support for the inclusion of a national paid leave program in the Coronavirus recovery legislation currently being developed. The Consortium for Citizens with Disabilities (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.

Over the past year, the COVID pandemic has highlighted exactly how important it is to have a national paid leave program. Millions of families suddenly found themselves needing to isolate to protect themselves or others or take leave to care for family members. Many people with disabilities lost access to services and family caregivers scrambled to fill gaps in care while working, many without paid leave. Children with disabilities relied on family caregivers not only for lost services, but for school demands as well. The essential work force of women of color that provides frontline disability services faced heightened risk of COVID and frequently lacked paid leave, despite needing to isolate to protect those they serve. Black, Indigenous, and people of color with disabilities have disproportionately died and faced disproportionate negative economic impacts from the pandemic, in addition to facing these disability specific challenges.

The need for paid leave for family caregivers and parents and for people with disabilities themselves existed before the pandemic and will continue after the pandemic is over. We need a permanent, national paid leave program to better support our care infrastructure. Paid leave is a crucial job support that enables people with disabilities and family caregivers to fully participate in the workforce. The CCD Paid Leave Task Force has created principle to guide the creation of a paid leave program to ensure it works for people with disabilities. We are attaching them with this letter. We also wish to highlight two specific policy issues.

First, the pandemic particularly highlighted the importance of including part time workers in paid leave and other safety net programs. People with disabilities, especially Black, Indigenous, and people of color with disabilities, disproportionately work part time, but are often left out of unemployment insurance and other safety net programs. They cannot be left out of paid leave.

This includes workers receiving Social Security Disability Insurance (SSDI) benefits or Supplemental Security Income (SSI) benefits. Currently, the leading paid leave proposal in Congress, the FAMILY Act, excludes from coverage individuals who receive SSDI, other Title II disability benefits, or SSI benefits while covering other part time workers. We do not understand this distinction and would urge the inclusion of all SSDI, Title II disability, and SSI beneficiaries who meet eligibility criteria in any paid leave program.

Second, proposals in Congress would place the administration of a paid leave program at the Social Security Administration (SSA). We are concerned about the burden that implementing a new program would place on SSA, especially since other Congressional proposals would also have SSA administer a new child allowance benefit. We do not believe that SSA could implement two completely new programs at once. In addition, SSA's customer service is at an all-time capacity low. From 2010 to 2019, SSA's operating budget shrank by nearly 11 percent while workloads rose.<sup>1</sup> Many people with disabilities still wait years to access benefits, including thousands who die waiting.<sup>2</sup> The pandemic has added a complicated set of factors to SSA's usual operations—many of the lowest income beneficiaries and potential beneficiaries have been unable to visit field offices and we expect SSA to face a huge backlog of issues as the country reopens. For example, SSI award rates are at their lowest rates per capita since SSA began collecting data<sup>3</sup> and reversing these rates which will require substantial SSA focus and resources when field offices reopen. SSA cannot afford to repurpose existing limited resources to implement a new program and even with its own funding, any new program would further burden the agency, creating additional and unacceptable delays. Should this new program fall under SSA's jurisdiction, the agency will require new mandatory funding to ensure that any program can be implemented and additional funding for traditional workloads to ensure that they are not lost in the shuffle.

Thank you for your strong support of a national paid leave program that works for people with disabilities. We look forward to working with you to make this crucial job support available to everyone. Please do not hesitate to contact Bethany Lilly ([lilly@TheArc.org](mailto:lilly@TheArc.org)) with questions or to arrange a meeting.

Sincerely,

Autistic Self Advocacy Network  
Center for Public Representation  
Division for Early Childhood of the Council for Exceptional Children (DEC)  
Epilepsy Foundation  
National Alliance for Caregiving  
National Organization of Social Security Claimants' Representatives  
National Respite Coalition  
RespectAbility  
The Arc of the United States

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<sup>1</sup> CENTER ON BUDGET AND POLICY PRIORITIES, SENATE BILL WOULD CUT SOCIAL SECURITY OPERATIONS AGAIN (2019), <https://www.cbpp.org/blog/senate-bill-would-cut-social-security-operations-again>.

<sup>2</sup> U.S. Government Accountability Office, Social Security Disability: Information on Wait Times, Bankruptcies, and Deaths among Applicants Who Appealed Benefit Denials (2020), <https://www.gao.gov/products/gao-20-641r>.

<sup>3</sup> AARP, *Closed Social Security Offices Hinder Applying for Supplemental Security Income* (2021), <https://www.aarp.org/retirement/social-security/info-2021/closed-offices-impact-ssi-applicants.html>.