Statement for the Hearing Record,
Hearing on Examining the Importance of Paid Family Leave
for American Working Families

U.S. Senate, Committee on Finance
Subcommittee on Social Security, Pensions, and Family Policy
July 11, 2018

Submitted July 24, 2018
Consortium for Citizens with Disabilities Social Security Task Force

Thank you for the opportunity to submit the following statement for the record of the Subcommittee’s July 11, 2018 hearing on “Examining the Importance of Paid Family Leave for American Working Families.”

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. The CCD Social Security Task Force focuses on disability policy issues in the Title II disability programs and the Title XVI Supplemental Security Income (SSI) program.

On July 11th the Subcommittee examined several proposals to expand access to paid family and medical leave for workers in the United States, including one put forward by the Independent Women’s Forum (IWF). The attached “Statement on Proposals to Use Social Security to Pay for Parental Leave,” signed by 25 members of the CCD Social Security Task Force, focuses on our concerns with the impact of the IWF proposal on Social Security. As noted in the statement, our nation can create a paid leave plan affordably and responsibly – without reducing workers’ Social Security benefits or forcing them to delay retirement.

We submit this statement for the record of the July 11th hearing. Thank you for the opportunity to share our views.

CCD Social Security Task Force Co-Chairs:
Lisa Ekman, National Organization of Social Security Claimants Representatives
Tracey Gronniger, Justice in Aging
Jeanne Morin, National Association of Disability Representatives
Web Phillips, National Committee to Preserve Social Security and Medicare
T.J. Sutcliffe, The Arc of the United States
The Independent Women’s Forum (IWF) has proposed creating a new parental leave benefit, paid for by asking workers to take a cut in their future Social Security benefits. Under the IWF proposal, workers could receive up to 12 weeks of partially-paid parental leave, offset by a reduction or delay in their Social Security retirement benefits. Participation would be voluntary.

The undersigned members of the Consortium for Citizens with Disabilities (CCD) Social Security Task Force oppose such proposals. The U.S. can create a paid leave plan affordably and responsibly – without reducing workers’ Social Security benefits or forcing them to delay retirement. We urge Congress to reject the IWF proposal and any similar proposals. We offer the following considerations related to the impact of such proposals on Social Security:

- **Access to paid leave should not be carved out of funds dedicated to Social Security.** Our Social Security system is a foundation of economic security for workers and their families in the event of a worker’s retirement, disability, or death. Social Security represents a promise to U.S. workers that has been built up and honored for over 80 years that should not be limited or cut. Expanding access to paid parental leave is an important goal for all workers, including people with disabilities and their families. However, proposals to fund paid leave out of workers’ future Social Security benefits would break the promise of Social Security, and should be rejected.

- **Workers should not be asked to pay for parental leave today by rolling the dice on their future needs for Social Security.** Research consistently finds that it is difficult to estimate financial needs in retirement, and workers often underestimate. Asking workers in their prime reproductive years to make decisions based in part on their prediction of future Social Security retirement benefit needs is unnecessary and unwise. Workers with disabilities and their families would be more likely to face this risky roll of the dice because on average, they are more likely to work in low-wage, part-time, non-managerial jobs that lack employer-based paid leave benefits.

- **Retirement security should be strengthened, not eroded or put at risk.** According to the Urban Institute, under the IWF proposal “…parents who take 12 weeks of paid leave through the program would have to delay their Social Security retirement benefits by 20
to 25 weeks depending on the repayment details.” Social Security represents a major source of income for most retirees: it provides over half of total income for most aged beneficiaries, and 90 percent or more of income for nearly 1 in 4 aged beneficiary couples and over 2 in 5 aged nonmarried beneficiaries. Even with Social Security, many seniors live in or near poverty – and seniors with disabilities are particularly likely to experience poverty. The CCD Social Security Task Force has long supported strengthening – not weakening – Social Security as a cornerstone of a financially sound retirement.

- **Any delays or permanent reductions in Social Security benefits could significantly harm the economic security of people with disabilities and their families.** IWF’s and similar proposals could be funded by raising the age at which a worker could collect full retirement benefits (in effect, a permanent reduction in benefits), or by withholding all of a worker’s initial Social Security retirement benefits for an amount equal to the paid parental leave taken (a delay in benefits). The more times a worker takes parental leave, the greater the future benefit reduction. The proposed treatment of Social Security disability or survivors’ benefits is not clear; any cuts in these benefits would be particularly harmful to people with disabilities and their families. Workers with disabilities on average earn significantly less than workers without disabilities and often have fewer opportunities to save. As a result, Social Security is particularly important to the economic security of people with disabilities, and any reductions or delays in benefits would disproportionately harm people with disabilities and their families.

- **Congress should adequately fund the Social Security Administration (SSA) to operate and strengthen its existing core programs – not repurpose existing limited resources to implement a new program.** From 2010 to 2018, SSA’s operating budget shrank by nearly 9 percent while workloads rose. As a result, customer service has been eroded across the agency. Today, nearly 1 million people are waiting an average of over 590 days for a hearing before an SSA Administrative Law Judge. These historic waits lead to extreme hardship: while awaiting a hearing, many struggle to pay rent or meet basic needs. Some lose their homes or go into bankruptcy, and in 2017 approximately 10,000 people died while waiting for a hearing. Congress must fully fund SSA’s operating budget to ensure timely, accurate disability determinations and humane, high-quality customer service across the agency. The IWF proposal would move in the opposite direction, “…raising Social Security’s annual costs, net of benefit offsets, about 1 percent over the long run”, according to the Urban Institute.

For these reasons, the undersigned members of the CCD Social Security Task Force urge Congress to reject the IWF proposal and any similar proposals to fund paid leave out of Social Security:

**CCD members:**
ACCSES
Allies for Independence
American Association on Health and Disability
American Association on Intellectual and Developmental Disabilities (AAIDD)
American Psychological Association
Autistic Self Advocacy Network
Bazelon Center for Mental Health Law
Christopher & Dana Reeve Foundation
Community Legal Services of Philadelphia
Easterseals
Family Voices
Justice in Aging
National Academy of Elder Law Attorneys
National Association of Councils on Developmental Disabilities
National Association of Councils on Developmental Disabilities
National Association of Disability Representatives
National Committee to Preserve Social Security and Medicare
National Disability Rights Network
National Multiple Sclerosis Society
National Organization of Social Security Claimants' Representatives
Paralyzed Veterans of America
Special Needs Alliance
The Arc of the United States
United Spinal Association

Joined by:
Lakeshore Foundation

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. The CCD Social Security Task Force focuses on disability policy issues in the Title II disability programs and the Title XVI Supplemental Security Income (SSI) program.

For more information, contact the CCD Social Security Task Force Co-Chairs: Lisa Ekman, lisa.ekman@nossr.org / (202) 457-7775; Tracey Gronniger, tgronniger@justiceinaging.org / (202) 683-1993; Jeanne Morin, jmorin.ppa@gmail.com / (202) 297-3616; Web Phillips, phillipsw@ncpssm.org / (202) 216-8358; T.J. Sutcliffe, sutcliffe@thearc.org / (202) 783-2229 ext. 314.