



American Association on Health & Disability

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AAHD - Dedicated to better health for people with disabilities through health promotion and wellness



LAKESHORE

January 26, 2020

Honorable Andrew Saul
Commissioner of Social Security
6401 Security Boulevard
Baltimore, MD 21235-6401

Submitted via www.regulations.gov

Re: Notice of Proposed Rulemaking on Rules Regarding the Frequency and Notice of Continuing Disability Reviews, Docket No. SSA-2018-0026, RIN 0960-AI27

The American Association on Health and Disability and the Lakeshore Foundation appreciate the opportunity to provide comments.

The American Association on Health and Disability (AAHD) (www.aahd.us) is a national non-profit organization of public health professionals, both practitioners and academics, with a primary concern for persons with disabilities. The AAHD mission is to advance health promotion and wellness initiatives for persons with disabilities.

The Lakeshore Foundation (www.lakeshore.org) mission is to enable people with physical disability and chronic health conditions to lead healthy, active, and independent lifestyles through physical activity, sport, recreation and research. Lakeshore is a U.S. Olympic and

Paralympic Training Site; the UAB/Lakeshore Research Collaborative is a world-class research program in physical activity, health promotion and disability linking Lakeshore's programs with the University of Alabama, Birmingham's research expertise.

The Burden on Individuals and Families of Proposed Additional Continuing Disability Review Requirements and Paperwork

The proposed additional requirements would mandate more Continuing Disability Reviews, more frequently. Everyone who receives a CDR has already been found disabled by SSA, meaning that they have one or more severe and medically determinable impairments that last over an extended time. AAHD staff is the parent of a 29 year old son, first determined at age 2 through the state of Maryland Child Find, to have substantial developmental disabilities. The every time change in employment status and earnings statement that must be appropriately submitted to SSA is a burden that causes significant anxiety given the under-staffing at SSA field offices, lack of timely SSA response, and uncertainty that submitted documents are actually received and processed by SSA. So often when we follow up with SSA staff, if we are lucky to learn that documents have been received, they are in a pile of documents to be processed and loaded into SSA systems files at some future time. The CDR form is very complex and requires the involvement of multiple health care professionals and community-based non-profit organizations providing supports to persons with disabilities and their families.

AAHD and the Lakeshore Foundation endorse the January 16 comments submitted by the **Consortium for Citizens with Disabilities (CCD) Task Force on Social Security** co-chairs. Specifically, we are concerned that the proposed rules would:

Increase the time and paperwork burdens of individuals with disabilities, their family members, and the health care professionals who must participate in the paperwork completion.

Increase the out-of-pocket cost obligation and financial burden on individuals with disabilities, families, and health care professionals of the new paperwork requirements of supplying medical records as part of the Continuing Disability Review process.

Increase the time and paperwork burdens placed on employers to document the individual with a disability employment history and status.

Add to the complexity of the form placed on persons with disabilities and their families.

Increase the time and paperwork burdens placed on community-based non-profit service organizations that provide support to persons with disabilities and their families.

The CDR form is 15 pages requiring detailed medical and medication histories. Making copies and mailing (without certainty of delivery) is burdensome and raises anxiety by persons with disabilities and their families.

Lack of SSA Evidence Justifying the Proposed CDR Changes

The Consortium for Citizens with Disabilities and numerous aging and disability organizations of persons with disabilities, their families, and advocates have challenged the lack of evidence by SSA justifying the proposed CDR changes. These coalitions and organizations are more technically competent than we regarding the complexity and evidence of the proposed changes.

Thank you for the opportunity to comment. If you have any questions please contact Clarke Ross at clarkross10@comcast.net.

Sincerely,



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