AGENCY BURDEN REDUCTION INITIATIVES

CASE STUDY

The Form: Continuing Disability Review (Social Security Administration)

Digitizing, simplifying, and streamlining an essential form for demonstrating continued eligibility for disability benefits.

What Is a Continuing Disability Review?

The Social Security Administration (SSA) is required to conduct medical Continuing Disability Reviews (CDRs) for individuals receiving disability benefits. CDRs are periodic reevaluations to determine whether disabled beneficiaries continue to meet SSA's standards for disability. Most disability beneficiaries are expected to complete a CDR every three years. Each year about 540,000 beneficiaries are asked to complete a full CDR, which begins with completing the SSA-454 form. This form requires individuals to provide updated medical, employment, and educational information.

For decades, SSA had estimated that the CDR takes, on average, one hour to complete.[43] But in 2020, when the agency proposed revisions to the frequency that some CDRs were conducted, it received public comments suggesting that this estimate substantially undercounted the time and effort involved in comprehending the instructions and notices, developing the necessary evidence, and completing and submitting the form. In response to this initial feedback, when the agency sought reapproval of the form in fall 2021 it proactively sought public feedback from beneficiaries and other interested members of the process regarding both its burden estimate as well as opportunities for burden reduction.

How Did SSA Improve the CDR Paperwork and Process?

- Public engagement: during this comment period, SSA received compelling responses from beneficiaries that the CDR process can be time-consuming, confusing, and highly stressful. 79 commenters specifically estimated the time they invested in completing the information collection. Over two-dozen comments highlighted the "fear," "anxiety," "stress," or even "dread" of going through a CDR. SSA then held nearly 30 sessions with members of the public where it conducted both discovery research and usability testing on the CDR form.

43. https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=200503-0960-003.

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- Launching iCDR: SSA launched a new service, iCDR, to allow the online submission of CDRs. For many beneficiaries, the iCDR web application provides an option for completing the CDR that is more convenient, quick, efficient, and accessible than the previous process, which relied almost exclusively on mailed-in paper forms.
- Automatic data population: every person who receives a CDR has submitted medical information to SSA, either during their previous CDR or as a part of their initial application. But when beneficiaries receive a paper SSA-454 form, they are expected to re-provide complete information related to their medical providers, prescriptions, and tests. Through iCDR, SSA is able to automatically populate a beneficiary's medical information onto the form, substantially reducing the time spent looking up doctor's names and contact information and details about medical tests and prescriptions.
- Removing potentially burdensome questions: SSA historically used two essay-style questions in the CDR ("Describe what you do in a typical day" and "Do you have any hobbies or interests?"), but through public consultation the agency learned that these questions were both unduly burdensome and potentially generating inaccurate information. After reviewing feedback, including from one stakeholder who described the responses as "used in harmful ways [that] isn't supported by the other evidence," SSA elected to fully remove the questions. Instead, SSA retained a question that allows respondents to more easily identify difficulties completing up to 21 different tasks associated with daily living.
- Consolidation, simplification, and clarification: Across the CDR form, SSA made meaningful changes oriented toward gathering the minimal information needed for the agency to reach out to medical providers to further develop the review. SSA removed several prompts related to documenting "first" and "next" visits to medical providers and removed other requirements because SSA could now receive this information directly from the medical providers. Elsewhere, SSA clarified certain terms and expanded available response options to improve the consistency and ease of responses.

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These changes to the CDR will reduce *learning costs*, making it easier for SSA beneficiaries to understand the materials they need to comply with the CDR process; *compliance costs*, making it easier for beneficiaries to complete the necessary paperwork by streamlining required information, bringing processes online, and carrying over information from past applications; and *psychological costs*, by reducing the use of questions that members of the public had deemed especially stressful or confusing to answer.