

Comment from Liaison Representative Claire Green on *Identifying and Reducing Burdens in Administrative Processes*
October 16, 2023

Line 4: Perhaps improving benefit services or improving the timeliness of benefit services. Improving benefits and services could be interpreted as increasing benefits.

Line 5: Replace “the” with “agency employees working in the area and.”

Line 19: Add “and targeted outreach to communities” after “surveys.”

Line 38: Add “, data sharing with other programs requesting the same information” after “processes.”

Line 46: Add “consistently across the agency” after “signatures.” SSA requires wet signatures for some documents, allows digital signatures for others, and will allow someone (including an SSA employee) to sign “on behalf of” for other documents. The requirements do not appear to be related to the sensitivity of the document.

Lines 116-118: While I agree the PRA is a lengthy process, its goal was to reduce the burden on the public of filling out a bunch of paperwork. Exempting customer experience research could end up increasing paperwork burdens on the public. It also could lead to unscientific questions being posed to the public or agency officials using a “customer experience” exemption broadly to garner information.