RESEARCH REPORT

How Does Funding of Administrative Expenses Affect Equity?

Underfunding the Social Security Administration's Operations Disproportionately Affects People with Disabilities

An Equity Scoring Initiative Demonstration Analysis

Jack Smalligan
URBAN INSTITUTE

Chantel Boyens
URBAN INSTITUTE

Karishma Furtado
URBAN INSTITUTE

Rekha Balu
URBAN INSTITUTE

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ABOUT THE EQUITY SCORING INITIATIVE

A partnership of PolicyLink and the Urban Institute

Federal legislation is fundamental to building a nation in which all can participate, prosper, and reach their full potential. Since our nation's founding, in many ways, federal legislation has created and exacerbated inequities, leaving one-third of the population experiencing material poverty and preventing our democracy from realizing the promise of equity.

To ensure the federal government serves us all, we must accurately understand and assess whether every policy advances or impedes equity.

The Equity Scoring Initiative (ESI) exists to establish the foundation for a new legislative scoring regime. By scoring for equity, we can begin to create an accountable, responsive democracy.

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The Urban Institute is a nonprofit research organization that provides data and evidence to help advance upward mobility and equity. We are a trusted source for changemakers who seek to strengthen decisionmaking, create inclusive economic growth, and improve the well-being of families and communities. For more than 50 years, Urban has delivered facts that inspire solutions—and this remains our charge today.

ABOUT POLICYLINK

PolicyLink is a national research and action institute advancing racial and economic equity by Lifting Up What Works®. To advance equity, PolicyLink advocates for groundbreaking policy changes that enable everyone, especially people of color, to be economically secure, live in healthy communities of opportunity, and benefit from a just society. PolicyLink is guided by the belief that the solutions to the nation's challenges lie with those closest to these challenges: when the wisdom, voice, and experience of those traditionally absent from policymaking drive the process, profound policy transformations emerge.

Contents

Sections in italics appear across all three October 2024 equity scoring reports for background.

Foreword: Equity Scoring and Equal Protection

By PolicyLink & Relman Colfax PLLC

Our vision for equity scoring is bold and therefore generational. A winning strategy for equity scoring requires a visionary approach that charts a new path as well as a savvy defensive approach. We are mindful of where this nascent work is most vulnerable to critique and offer corresponding guardrails. In the current political and social climate that has seen the reversal of race-based affirmative action among other retrenchments, there are those who will attack equity scoring as ill-advised if not outright illegal under the Equal Protection Clause of the 14th Amendment. They are wrong. We want to allay any such concerns so that readers can fully engage with the more forward-looking equity scoring example that follows in this demonstration paper as well as the other reports and products of the Equity Scoring Initiative. Recent legal challenges to equal protection and movement to race-neutrality in governing policy implementation have created a chilling effect on government decisionmakers—elected and administrative—in advancing fairness and equitable outcomes. But equal protection does not require race blindness, and governing decisions may be informed by an understanding of whether and how effectively different policy options will reduce inequities, including accumulated inequalities based on race, gender, disability, or other characteristics.

Under current practice, equal protection is reactive and complaint-based. It requires individuals to prove that they have been harmed by policy implementation and to seek redress through administrative complaint or private legal action. However, instead of waiting until a law is passed and policy is implemented to see if any class of citizen is harmed, legislative scoring, as demonstrated by the Equity Scoring Initiative, can make equal protection proactive and expand the capacity of the federal government to repair past disparities and prevent future harm.

Scoring policies and regulations for equity contextualizes the projected impact of proposed legislation to enable legislators, and their constituents, to make more informed decisions. The Equal Protection Clause generally precludes legislation that deliberately treats people differently because of their race, ethnicity, or gender, but analyzing or scoring legislation for equity does not alter a bill's underlying facial neutrality any more than budget scoring alters a bill's fiscal impact. Both types of projections give policymakers insights into the long-term impacts of a proposal to facilitate their own analysis, but neither changes a bill.

Nor does a legislator—acting based on knowledge of whether and how a piece of legislation advances equity, such as by revising the bill or voting a certain way—undermine the bill's compliance with the legal standard for equal protection. Equity scoring instead provides the kind of information that helps legislators identify workable and legally supportable policies that address racial and other inequities. Multidimensional equity analyses are comparable to analyses of the projected impact of a facially race-neutral student assignment policy on the racial composition of schools, something federal courts have held that policymakers may legally consider.[1] These analyses entail consideration of race in terms of predicting different outcomes by individuals' demographic characteristics. Policymakers who choose to rely on the analyses may be motivated by racial goals, yet the policies they inform are—at least on their face—race-neutral. A legislator's motivation for shrinking a long-standing disparity differs from an unlawful discriminatory intent because no racial or other animus is involved. In the absence of racial animus, race-neutral legislation informed by a race-aware analysis such as equity scoring remains race- neutral from an Equal Protection perspective and does not call for heightened legal scrutiny.

Information about variation in outcomes by race and ethnicity, and by disability status, allows legislators to make informed choices among various race-neutral provisions. The scoring lets legislators address underlying racial inequities more effectively through facially race-neutral means. Providing transparency and access to equity scores, in the same way that budget scores are made available to the public, likewise creates a mechanism for citizens to hold decisionmakers accountable to the promise of the 14th Amendment for equal protection under the law. A policymaker considering how funding of administrative expenses affects equity, as presented in this report, does not inject animus or disregard of the rule of law into the legislative process.

In short, there is nothing forbidden about equity scoring. The information it promises is essential to making policy that is more intentionally fair and just. In the pages that follow, our Urban Institute colleagues show you how, using the example of administrative expenses in the Social Security Administration.

The Equity Scoring Initiative affords an opportunity for government decisionmakers at all levels to use data and analysis to advance equity and fairness in policies, regulations, programs, and investments, and to live into the spirit and intent of the 14th Amendment and the promise of equal protection. Clearly, further methodological developments will be necessary for scoring different types of legislation. However, the legal grounding for equity scoring discussed here is broadly applicable and can be enabled in the governing process. As the 13th and 14th Amendments continue to be interpreted, our hope is that future jurisprudence will allow Congress to legally institutionalize the consideration of equity scores in the legislative process, similar to the conduct and use of budget scoring.

Note

[1] See Boston Parent Coal. for Acad. Excellence Corp. v. Sch. Comm. for City of Bos., 89 F.4th 46, 62 (1st Cir. 2023) (rejecting the plaintiff's challenge because "including racial diversity as a consideration and goal in the enactment of a facially neutral plan" does not call for strict scrutiny); *Spurlock v. Fox*, 716 F.3d 383, 394 (6th Cir. 2013) (reasoning that "if consideration of racial data were alone sufficient to trigger strict scrutiny, then legislators and other policymakers would be required to blind themselves to the demographic realities of their jurisdictions and the potential demographic consequences of their decisions" and that the facially neutral school zoning plan did not violate the Equal Protection Clause on rational basis review); and Lewis v. Ascension Par. Sch. Bd., 806 F.3d 344, 358 (5th Cir. 2015) (holding that "the district court did not err in concluding that Option 2f does not make express racial classifications and so is not subject to strict scrutiny on that basis" and that the plan did not violate the Equal Protection Clause on rational basis review).

Acknowledgments

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Executive Summary

While many equity analyses of the potential outcomes of federal proposals have focused on mandatory legislation, discretionary appropriations also play a key role in determining people's access to benefits and services, and the exercise of certain rights. In the case of Social Security, benefits payments under the Old-Age, Survivors, and Disability Insurance and Supplemental Security Income programs are fully funded to provide income assistance to all eligible individuals (i.e., through mandatory or direct spending). However, administrative expenses, funded through annual discretionary appropriations by Congress, directly affect how the Social Security Administration serves its programs' intended beneficiaries and the public.

Our analysis examines trends in Social Security Administration (SSA) funding, benefit claims and approvals, and backlogs and wait times over the past 15 years. When SSA's budget does not keep pace with the volume of claims and other work, all beneficiaries are not affected equally. Instead, reductions in service fall disproportionately on people with disabilities, many of whom rely on SSA to provide disability insurance that employers and the private market often do not provide. These reductions in service that the government is required to provide include delays in processing disability claims, closure of field offices, and longer wait times on the phone and in person. These lower service levels can reduce access to Social Security services and benefits for all, but they disproportionately affect people with disabilities and individuals who face additional barriers, including people with lower incomes, language barriers, and less education. Black and Native Americans are also disproportionately affected because they are more likely to have a disability, owing to long-standing disparities in the social determinants of health (Courtney-Long et al. 2017). These disproportionate effects create unfairness in access to benefits and outcomes.

Lower SSA service levels have substantial impacts on disabled applicants and beneficiaries, including reduced employment, earnings, financial well-being, and health. Underfunding SSA operations also increases the administrative costs of processing disability claims and administrative burdens on applicants and beneficiaries. Persistent underfunding or deep reductions in administrative funding, absent new efficiency gains or a reduction in new claims, can erode service more broadly and affect other beneficiaries, including retirees, spouses, children, and widows or those doing business with SSA. Such erosions appear to be occurring within the agency because of an uptick in disability claims, and low funding levels and they are expected to accelerate in the near term.

How Does Funding of Administrative Expenses Affect Equity?

To evaluate how well a policy or program would improve equity in outcomes, analysts need to examine current and proposed levels of funding, as this resourcing is essential to achieving the goals of a policy or program. Without fairness in funding, programs and the agencies that administer them cannot reasonably improve outcomes. We explore how to consider equity in discretionary appropriations by Congress for the administrative expenses used to operate federal programs. Using the Social Security Administration as an example, we examine how appropriations decisions about levels and distribution of funding of field offices and other operational expenses ultimately affect applicants and beneficiaries of SSA's programs and therefore have implications for fairness in economic security, health, and well-being.

In this report, we examine the Social Security Administrations' stated goals using the Equity Scoring Initiative's preliminary framework. This report is part of a set of publications assessing whether policy proposals aiming to prevent and alleviate economic insecurity during retirement can improve fairness in outcomes—that is, equity.

Why We Focus on Financial Insecurity among Older and Disabled Adults and Evaluate Federal Efforts to Combat It

A critical element of economic security and mobility is having enough money to care for yourself after stopping work or reaching retirement age. Most people in the United States rely on a combination of Social Security, employer-sponsored retirement accounts, and personal savings to support themselves as they age. Some people rely more on one source of retirement income than another, making retirement more precarious for some.

One in seven adults ages 65 and older in the US, comprising more than 8 million people, lived in poverty in 2022 (Ochieng et al. 2024).[1] Two in five working-age households in 2022 were at risk of not affording their pre-retirement standard of living in retirement, despite some economic gains in recent years from the strong labor and housing markets and the pandemic's fiscal stimulus (Yin, Chen, and Munnell 2024).

Economic insecurity among older adults partly reflects shifts over recent decades in Social Security benefits, employer-sponsored pensions, and individual savings. Social Security benefits, on their own, cannot cover the costs of living for older householders, and employers have increasingly shifted from traditional defined benefit pension plans to defined contribution retirement plans, such as 401(k)s, putting more responsibility on employees to plan and manage their retirement assets (Jeszcek 2017). These shifts, coupled with rising health care costs and household debt, have impaired the economic security of many older adults.

However, economic insecurity during retirement is not borne equally. Poverty rates among older adults in 2022 were significantly higher for Asian, Black, Hispanic, and Native American people than for white people (Ochieng et al. 2024). People with disabilities are also more likely than others to experience poverty during their working-age years, putting them at greater risk of retirement insecurity (Drake and Burns 2024). Poverty in retirement is disproportionately high among other groups as well, including immigrants, women, and LGBT seniors (Bouton, Brush, and Meyer 2023; Li and Dalaker 2022; Population Reference Bureau 2013). These disparities exist because of economic inequities throughout every stage of life, stemming from a range of structural barriers that cumulatively and unjustly hinder the financial well-being of older adults from historically marginalized groups.[2]

Tackling retirement insecurity will involve changing disability policy through an intersectional lens, as many people are forced to leave the labor market because of a disability and eventually move from relying on disability benefits to relying on retirement benefits. Analysis of 2014 survey data indicates that 24 million working-age adults (ages 18 to 66) applied for Social Security Disability Insurance (SSDI) at some point, with about half of applicants denied benefits (Weaver 2021). Applicants for disability benefits, whether allowed or denied, are twice as likely as the general population to have less than a high school education. Black workers make up a disproportionate share of applicants for disability benefits. Moreover, 38 percent of denied applicants and 25 percent of allowed applicants lived in poverty, compared with 13 percent of the general population.

Retirement insecurity is a complex, compounding issue, and addressing it, especially for those most at risk, requires a multipronged approach. This approach will need to include efforts like reforming Social Security, which continues to be the largest source of income for older householders.[3] Holistic solutions would also include targeting employer-sponsored and individual retirement savings and improving health care and social programs that support those who cannot participate in the labor market. A successful approach would also aim to reduce financially burdensome medical costs, provide insurance against catastrophic spending on long-term services and supports for people who need help with basic personal care, and guarantee affordable housing. More broadly, eliminating structural barriers to economic opportunities and economic mobility may further help bridge racial income and wealth gaps that feed into economic insecurity after one's working years (Kijakazi, Smith, and Runes 2019).

To fulfill the promises of the Constitution's Equal Protection Clause, the federal government must avoid, prohibit, and remedy the effects of discrimination across all its policies and programs, including Social Security.[4] The government is legally authorized, and in some instances legally required, to act to promote fairness and advance equity. Long-standing Supreme Court precedent, key civil rights statutes, and recent executive orders shape these constitutional demands of equal protection. For example, the Supreme Court held more than 50 years ago that even otherwise "neutral" employment policies and practices "cannot be maintained if they operate to 'freeze' the status quo" of prior discrimination.[5] The Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, religion, sex, or national origin and extends to all recipients of federal funds. Equity scoring provides a measurable way to evaluate the federal government's efforts to achieve this important mandate.

Policies Targeting Economic Security among Older and Disabled Adults

Across our analyses of retirement and disability policies, we look at equity in policy funding, access/reach, and outcomes. In each publication, we focus on one of these lenses in our evaluation of a selected policy affecting retirement security. We also discuss how well the policy we study may improve the outcome of economic security.

Economic security—having adequate and stable income to meet basic needs—is essential to individual, neighborhood, and societal well-being. Economic *in*security is widespread in the United States, especially among Black and Hispanic individuals and families and people with disabilities (Langston 2018) (box 1). Policies ranging from education, to employment, to health care, to criminal justice may create barriers to advancement that make it difficult for people of color, people with disabilities, and other marginalized groups to attain economic security.

Economic security in retirement—or lack thereof—is the outcome of a lifetime of earnings and savings. Because of differences in access to opportunity to earn and save across the life course, the access to programs and structures intended to help people prepare for retirement and achieve retirement security capacity varies among demographic groups.

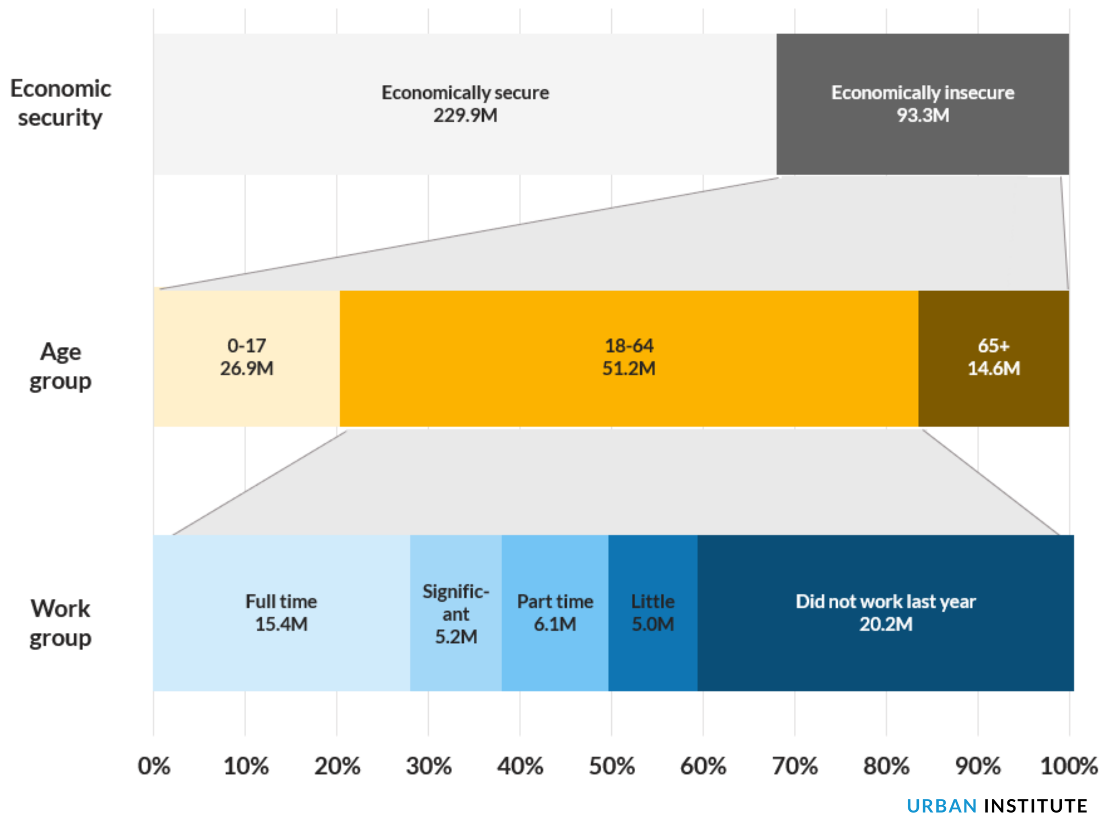
BOX 1

Economic Insecurity and Inequality in the United States Motivates the Equity Scoring Initiative

About a quarter of Americans are economically insecure, defined as living in a household earning income below 200 percent of the federal poverty level (figure A). In 2023, this amounted to a single person making about $29,000 a year or a family of four making $60,000 maximum. Included in this substantial swath of the population are those who cannot attain a basic standard of living as well as those who are one unexpected expense or illness away from economic catastrophe. Simultaneously, a much smaller portion of people have very high incomes. In 2018, people in the top 1 percent of the income distribution received more than 20 percent of the nation's income.[a] Past and current policy have contributed to and propagated this injustice; future policy can repair it.

FIGURE A

Age and Work Profile of Economically Insecure Individuals, 2022



Source: Authors' analysis of 2022 five-year American Community Survey data from IPUMS USA.

Notes: Economically insecure is defined as living in a household earning less than 200 percent of the federal poverty threshold. Figures may not sum to totals because of rounding. Work groups for working-age adults (18–64-year-olds) are defined as follows: full time is at least 35 hours a week and 39 or more weeks per year; significant is either 35 or more hours a week for 27–39 weeks per year or 25–34 hours a week for at least 27 weeks per year; part time is either at least 25 hours a week for 14–26 weeks per year or 10–24 hours a week for at least 14 weeks per year; and little is at least 1 hour a week for at least 1 week per year or working any number of hours for 1–13 weeks per year.

[a] Emmanuel Saez, "Striking It Richer: The Evolution of Top Incomes in the United States" (Updated with 2018 estimates)" (Berkeley: University of California, 2020).

The Equity Scoring Initiative

The US legislative process uses a well-established approach, called budget scoring, to examine the anticipated budgetary implications of proposed policies. An important component of vetting a policy, projecting a 10-year impact on the deficit via budget scoring encourages accountability to a set of financial and social values. But dollars are an imperfect way of measuring the values of fairness and justice enshrined in the Constitution. If we want to know whether and how well a prospective policy will advance those values and goals, we need a different, complementary scoring process. Equity scoring, or the process of systematically examining a policy or policy proposal's potential impact on fairness and justice in outcomes, is a necessary step in the policy design process.

In recent years, policymakers, funders, policy researchers, and advocates have called for this type of information to drive the policymaking process, resulting in new efforts and advances spearheaded by the Equity Scoring Initiative, a partnership between PolicyLink and the Urban Institute. These and related efforts signal that equity scoring is both needed and possible right now.

The current scale of economic insecurity and inequality is untenable for a thriving economy and society. Nearly 100 million people are living at or beyond the brink of precarity, according to our analysis, and this burden is unevenly distributed across racial and ethnic groups (authors' analysis; Langston 2018; see box 1). Government policy can help alleviate this economic injustice. The magnitude of the challenge suggests a clear focus for policymakers on the change needed to reform historical and contemporary policies and structures that created the gaps we see today. Grounded in a vision of equity that underscores the role and responsibility of the federal government to foster economic vitality and stability for all people, the Equity Scoring Initiative analyzes policies for how well they perform at creating new or improved paths to fair outcomes.

Scoring Mandatory versus Discretionary Legislation

Through the Equity Scoring Initiative, PolicyLink and the Urban Institute have explored how the potential outcomes of proposed legislation could be scored alongside the budgetary impacts of proposed legislation to understand progress toward fairness in outcomes. This initiative previously published a report providing a framework for equity scoring as well as empirical case studies (Ashley et al. 2022). This research has largely focused on equity scoring of mandatory legislation, typically involving the creation of a new program or an expansion of an existing one, such as expansions to the child tax credit (Balu et al. 2022).

However, discretionary appropriations are a critical piece of the federal budget, providing funding for most federal administrative expenses as well as many benefit programs. The Congressional Budget Office summarizes the difference between discretionary and mandatory legislation as follows:

> The scorekeeping process, like the federal budget process, distinguishes between two types of federal legislation on the basis of the Congressional committees that originate them: appropriation legislation and authorization legislation. Discretionary spending stems from authority provided in appropriation acts; direct (or mandatory) spending and revenues (tax receipts and other collections that arise from the federal government's use of its sovereign power) are generally controlled by laws other than appropriation acts. (Ramirez-Branum and Riorden 2021, 2)

Because of the conceptual differences between discretionary and mandatory spending, the federal budget process subjects each to different budget rules and establishes different baselines for each. Similarly, equity scoring of discretionary appropriations will reflect these differences:

- **An equity assessment of a mandatory bill assesses how well a policy is designed to improve access to services, how a change in direct spending or revenue policy might impact a policy outcome relative to the current-law baseline, and whether that change in outcomes moves a program or population closer to fairness in outcomes.** This analysis to advance equity applies to discretionary and mandatory spending programs alike.
- **Discretionary appropriations occur annually (including for programs authorized for a multiyear period) and are the primary source of funding for federal agency operating expenses.** The discretionary baseline includes an assumed rate of growth in funding. Failure to enact an appropriation that provides sufficient funding to maintain the baseline level of operations will require programs to either improve efficiency or alter, reduce, or suspend their programs and activities.[6] As a result, an equity score of a discretionary appropriation, especially one that serves a historically excluded population, begins with assessing whether the appropriation maintains current levels of operation while accounting for other offsetting efficiency and programmatic changes.
- **Changes in discretionary funding could affect equity either by changing how the program is administered or by directly altering benefits or available services**.

Applying Equity Scoring to the Discretionary Appropriations Process

Discretionary appropriations are one part of the federal budget process, which begins with agencies formulating requests to the president and the president transmitting the administration's budget request to Congress.[7] The congressional appropriations process begins when the House and Senate set an overall discretionary spending limit for all federal agencies and programs known as a budget resolution. Often, the spending limit is divided into defense and nondefense agencies. When the House and Senate do not agree on the limit, they set different targets. Funding within the budget resolution is allocated across each of the appropriations committees, and the appropriations committees allocate funding across their respective subcommittees. The appropriations subcommittees distribute funding across the agencies, bureaus, and programs within their jurisdictions. The House and Senate must resolve differences in their respective allocations and ultimately pass identical appropriations bills, which are sent to the president for signature.

Opportunities for equitable decisions and considerations are present at every stage of the appropriations process and, unlike most mandatory legislation, must be revisited every year. The annual nature of the discretionary appropriations process also provides an opportunity to address newly emerging social contexts, such as COVID-19, climate change, or other events related to an agency's programs. This raises the question of how and when an equity improvement *score*, a single summary measure of a policy's potential to improve fairness, could or should be applied to funding decisions. Because of the iterative, cyclical nature of discretionary appropriations process, we suggest that equity *assessment* should be conducted as part of the annual policy and budget process. Each stakeholder in the process, which includes executive branch agencies, the White House, and Congress, should analyze the impact of funding levels and policy decisions on improving equity and use that analysis to formulate, justify, and inform decisions, drawing on latest guidance on cost-benefit analyses (White House 2023). This appropriation process, therefore, is grounded in specifics at the program and account level of the discretionary budget.

An equity improvement score (indicating advances toward fairness in outcomes) could be derived at various levels or stages of the process, such as at the program account or agency funding level. However, at higher levels of aggregation, an equity score of discretionary appropriations would be subject to greater uncertainty since it would necessarily involve an increasing number of trade-offs across a wider range of programs and intended impacts. For example, an overall equity score of the appropriations bill for the Departments of Labor, Health and Human Services, Education, and related agencies would need to weigh trade-offs in funding for the National Institutes of Health, child care, Head Start, Pell grants, low-income energy assistance, and SSA administrative expenses (among others). The complexity of assessing those trade-offs across many target populations and outcomes could yield a more subjective equity score as analysts are forced to make judgment calls without data to guide their assessment.

Programs and Activities Funded by Discretionary Appropriations

Discretionary appropriations fund many types of programs and activities, such as the following, with implications for equal access as well as equity in outcomes:

- **Agency administrative expenses, such as salaries for federal employees and investments in information technology**. The appropriation for SSA provides funds for tens of thousands of federal and state employees.
- **One-time grants or contracts as well as ongoing services or benefits.** For SSA, appropriations support the processing of millions of claims for retirement, disability and auxiliary benefits to which applicants are entitled. In the Department of Education, within SSA's subcommittee, appropriations support the agency in processing applications for Pell higher education grants as well as for the grants themselves. Similarly, the Department of Agriculture appropriations support local agencies in processing applications for Special Supplemental Nutrition Program for Women, Infants, and Children benefits as well as the benefits themselves.
- **Competitive and formula grants to state and local government and private entities.** Regular formula grants, or infrequently competed grants, can be considered essential funding for the entities receiving the funds. Funding for the Head Start program, also within SSA's subcommittee, supports the cost of employing tens of thousands of local early childhood educators. Another agency within SSA's subcommittee, the National Institutes of Health, issues many competitive grants and contracts for health research.
- **Grants to states for which the state has substantial discretion**. Within SSA's subcommittee, appropriations provide states with funds for child care services and low-income home energy assistance. How states allocate the funds is largely at their discretion such that they are often simply referred to as "block grants."

The Case of the Social Security Administration

The SSA is an example of an agency charged with administering one important subset of benefit programs, those that process claims for benefits stemming from either an implicit or explicit legal entitlement for qualified individuals. Representatives of the SSA, per the Code of Federal Regulations, have an affirmative duty to assist people applying for or claiming benefits in a way that furthers an efficient and fair decisionmaking process, "act with reasonable promptness," and avoid unnecessary delay.[8] The Departments of Homeland Security, Veterans Affairs, and Education are all also responsible for processing such claims, which include Social Security and veterans' benefits, Pell grants, and changes in immigration status (Sidath and Sussman 2023).

When the appropriations process provides inadequate funding to keep up with new claims, the claims do not go away. The government has a legal obligation to fully process and adjudicate these claims; so, instead, they simply shift into the future. This shift in timing imposes delays on individuals awaiting decisions. In many cases, the delay imposes costs on the individual while also increasing the cost to the agency of processing the claim. In the case of Pell grants, Congress created special budget scoring rules in response to the tension between limited discretionary funding and the legal right to benefits. These rules incentivize the appropriators to fully fund administrative costs of processing applications. We fully discuss those budget scoring rules in appendix A.

In addition to legal entitlements, there is an additional set of programs where there is a strong public expectation that a benefit will be available to all who request it and meet the eligibility criteria. One such example is the Special Supplemental Nutrition Program for Women, Infants, and Children program. There is long-standing bipartisan agreement, reinforced by public health experts, that providing high-quality nutritious food to pregnant women, new mothers, and infants is in the public interest. However, even with strong bipartisan support, these programs are vulnerable to lapses and cuts, which at times has required Congress and administrations to take special measures to fully fund the program.

In certain instances, a specific statute may apply to an area of discretionary appropriations such that the federal government is required to act to promote fairness and advance equity in allocating that funding.[9] In other instances, constitutional equal protection principles and applicable statutory prohibitions on disparate impact are best understood as requiring discretionary funds to be allocated in a way that avoids deepening the effects of past discrimination.[10] Even where, as in the Social Security context, a specific statute may not be applicable, overarching constitutional principles and the President's executive orders still direct federal funding decisions to be made equitably.

Social Security Administration's Administrative Budget

SSA's administrative budget is funded through the subcommittee on Labor, Health and Human Services, Education, and Related Agencies. Table 1 shows some of the largest programs the subcommittee funds. With each annual appropriation, the agencies and programs within the bill are subject to intense competition and funding pressure. For example, in previous years there has been pressure from some leaders to double the size of the National Institutes of Health, which would necessitate large cuts in other programs. For the fiscal year (FY) 2024 appropriation, one such pressure point is that temporary funding for child care under the American Rescue Plan will end, creating a funding challenge for policymakers who would like to continue the program at prior levels.

TABLE 1

Discretionary Funding for Administrative Expenses

From the Departments of Labor, Health and Human Services, and Education fiscal year 2023 appropriations bill

	Fiscal year 2010 budget ($billions)	Fiscal year 2023 budget ($billions)	Change (%)
Department of Labor	**13.5**	**13.8**	**2.0**
Department of Health and Human Services	**74.0**	**115.4**	**56.0**
National Institutes of Health	31.0	46.0	48.3
Head Start	7.2	12.0	65.8
Department of Education	**64.3**	**79.6**	**23.8**
Pell Grant funding	17.5	22.5	28.5
Social Security Administration	**11.3**	**14.0**	**23.9**

Sources: Karen E. Lynch, Angela Napili, Jessica Tollestrup, Kavya Sekar, Ada S. Cornell, Kyle D. Shohfi, William R. Morton, and Cassandra Dortch, *Labor, Health, and Human Services, and Education: FY 2023 Appropriations*, Report R47345 (Washington, DC: Congressional Research Service, 2023); and Pamela W. Smith, Gail McCallion, and Gerald Mayer, *Labor, Health and Human Services, and Education: Highlights of FY2010 Budget and Appropriations*, Report R40730 (Washington, DC: Congressional Research Service, 2010).

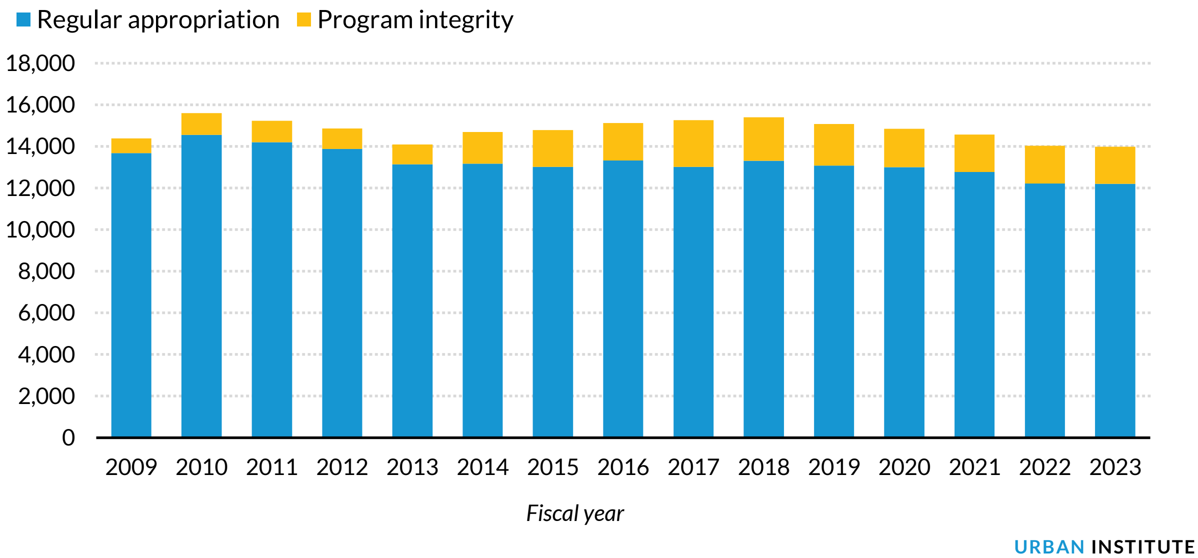
Note: Funding for the Social Security Administration includes funding through a discretionary cap adjustment for funding enforcement of program rules, generally referred to as program integrity activities. For more information on cap adjustments, see *Analytical Perspectives, Budget of the US Government, Fiscal Year 2023*, https://www.whitehouse.gov/wp-content/uploads/2022/04/spec_fy2023.pdf.

While SSA's budget increased by 24 percent in nominal terms from 2009 to 2023, it declined in real terms by 2.8 percent over the same period. Figure 1 shows SSA's administrative funding for FY 2009 to FY 2023 in constant 2023 dollars.[11] After some years of modest increases, funding for SSA fell by 9.2 percent from its peak in real terms in FY 2018. In FY 2024, Congress continued this trend by providing a $100 million increase, which represents a 5.5 percent decrease when adjusted for inflation. Additionally, appropriators have increasingly relied on special program integrity funding for the agency. Funding for certain program integrity activities, such as reviews of eligibility for disability benefits under both Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI), does not count against the appropriations committees' spending limits when caps on discretionary spending are in place (The White House 2023).

FIGURE 1

SSA Appropriations for Administrative Expenses in Real 2023 Dollars

In thousands of dollars



Source: William R. Morton and Tamar B. Breslauer, *Social Security Administration (SSA): FY2023 Annual Limitation on Administrative Expenses (LAE) Appropriations: In Brief*, Report R47480 (Washington, DC: Congressional Research Service, 2023).

Implications for SSA's Service to the Public

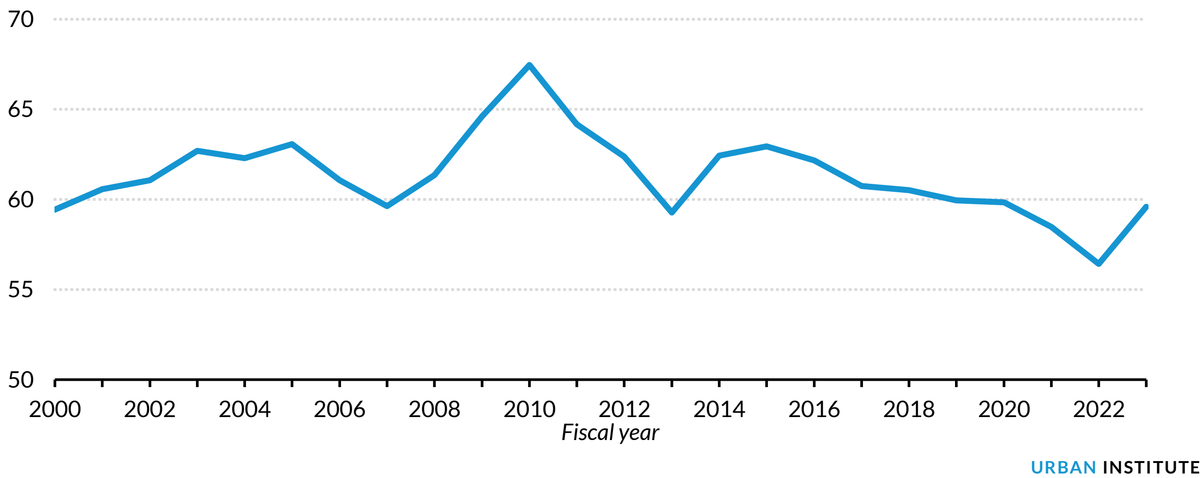
The impact of nearly flat funding in real terms over many years is reflected in SSA's staffing and service levels. Figure 2 shows the number of full-time staff on duty from fiscal years 2000 to 2023. During that time, staffing peaked at 67,462 full-time permanent employees in FY 2010, then declined by 12 percent to an historic low of approximately 56,000 in FY 2022, then increased to 60,000 in FY 2023. In FY 2022, SSA reached its lowest staffing level in 25 years with 56,423 full-time permanent employees. In FY 2023, SSA staffing increased to 59,591, a 12 percent reduction from its FY 2010 height.

While funding levels have remained flat and staffing has decreased, the agency has seen a dramatic rise in the number of beneficiaries it serves (figure 3). Since 2000, the number of beneficiaries has increased about 50 percent. The increase is primarily driven by claims for Social Security retirement benefits, which are faster and easier to process than other benefits that have more criteria than retirement age. At the same time, disability claims have decreased over the past decade, relieving some pressure on the agency. While disability claims are still well below peak levels, new claims for disability have begun to rise recently, especially with the onset of COVID-19.

FIGURE 2

Trends in SSA Staffing Levels, Fiscal Years 2000–23

Full-time staff on duty, in thousands

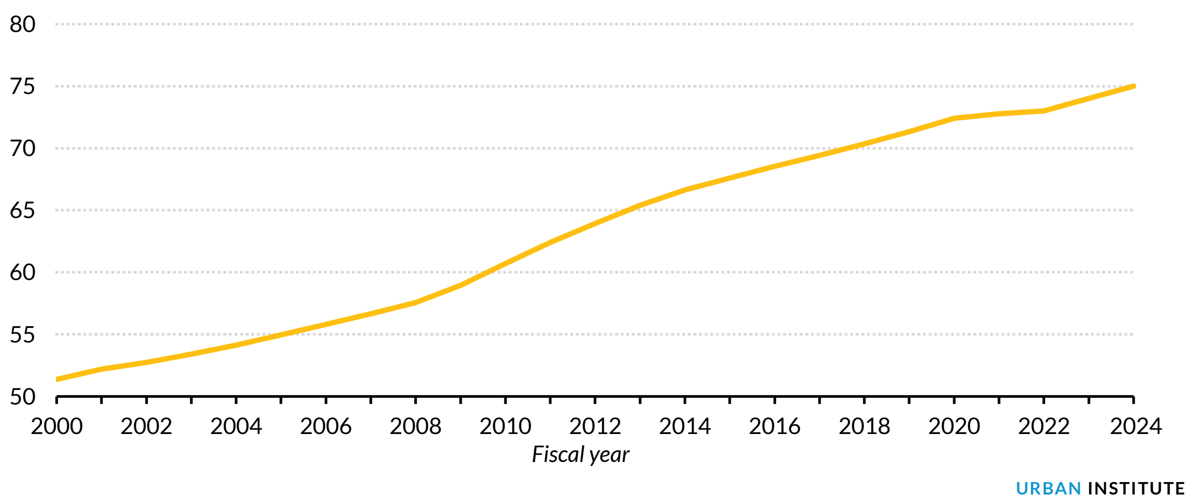


Sources: *Social Security Administration's Agency Financial Report Fiscal Year 2023*, Publication No. 31-231 (Baltimore: SSA, 2023), available at https://www.ssa.gov/finance/; and authors' communication with SSA.

FIGURE 3

Social Security and Supplemental Security Income Beneficiaries, Fiscal Years 2000–24

In millions

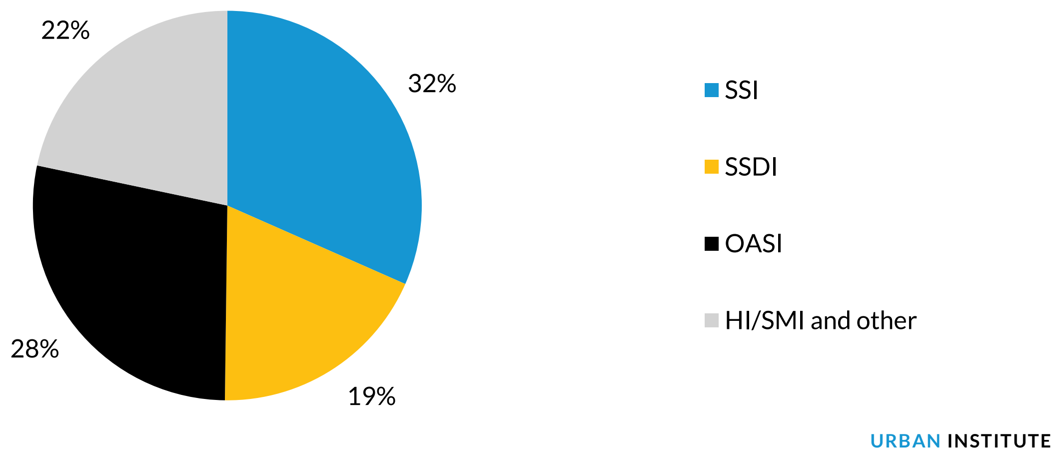


Sources: *Social Security Administration's Agency Financial Report Fiscal Year 2023*, Publication No. 31-231 (Baltimore: SSA, 2023), available at https://www.ssa.gov/finance/; and authors' communication with SSA.

As there are competing funding pressures within the Labor, Health and Human Services, Education, and Related Agencies appropriation, there are also competing programmatic pressures within SSA. While the majority of benefits paid to individuals are retirement benefits, the complexity of disability claims makes them more expensive to administer and comprises a larger share of SSA's administrative budget. Approximately 51 percent of SSA's administrative budget is devoted to administering disability benefits in the Social Security and SSI programs (figure 4).

FIGURE 4

SSA Administrative Expenses by Major Program, Fiscal Year 2023



Sources*:* *Social Security Administration's Agency Financial Report Fiscal Year 2023*, Publication No. 31-231 (Baltimore: SSA, 2023), 30, available at https://www.ssa.gov/finance/; and authors' communication with SSA.

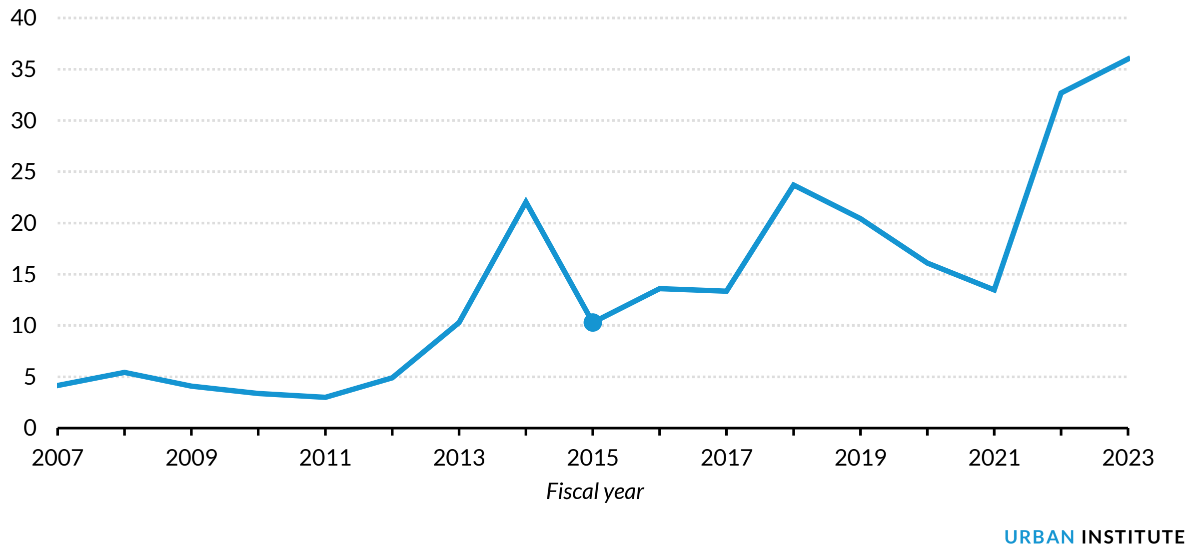
Notes: Major programs include Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), Old-Age and Survivors Insurance (OASI), and Medicare Hospital Insurance and Supplementary Medical Insurance (HI/SMI). Percentages do not total 100 because of rounding.

While the shift in the composition of claims SSA's processes has reduced some pressure on its budget, along with investments in technology that improve productivity, it has not been sufficient to fully offset the impact on service to the public. One key metric for measuring SSA's customer service is the amount of time people must wait to talk to a Social Security representative through SSA's 800 number. As figure 5 shows, the average wait time on SSA's national 800 number has risen from approximately 13 minutes in 2017 to 36 minutes in 2023. Phone wait times affect all applicants and beneficiaries in all SSA programs but may be especially detrimental to people with disabilities, foreign language speakers, those with less education, and others who face barriers to applying for benefits.

FIGURE 5

Social Security 800 Number Wait Times

Average speed to answer (in minutes)



Source: "Social Security Administration (SSA) Monthly Data for National 800 Number Network (N8NN) Average Speed to Answer;" Social Security Administration, accessed August 12, 2024, https://www.ssa.gov/open/data/800-number-average-speed-to-answer.html.

The Disproportionate Effects of Low Funding on Disability Applicants and Beneficiaries

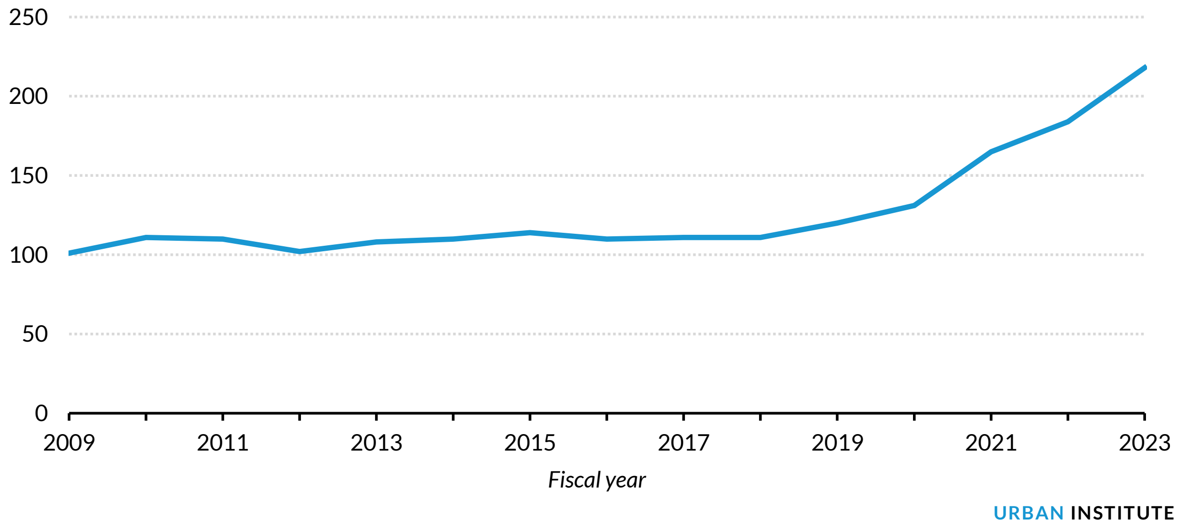
SSA reports on a wide range of customer service metrics, including the amount of time it takes to process a claim and the number of people awaiting a decision, often referred to as the backlog claimants. However, SSA does not report on the wait time for retirement claims or any potential backlog. This is because SSA has stayed current on retirement claims even when funding is low, preventing any increase in wait times and accumulation of backlogs for retirement benefits.

The impact of SSA's funding and staffing levels is primarily reflected in its service to disability claimants. Backlogs and wait times for each key stage in the disability determination process are tracked closely, and data show that the disability program has absorbed the brunt of low funding levels. Figure 6 below shows initial disability decision wait times from 2009 to the present. For many years, applicants for SSDI and SSI disability benefits waited between 100 and 110 days for an initial determination. Time for an initial decision began to increase in 2019, rose sharply during the COVID-19 pandemic, and continued to increase afterward, reaching 218 days by the end of fiscal year 2023.

FIGURE 6

Initial Disability Decision Wait Times for SSDI and SSI Claims, Fiscal Years 2009–23

In days



Source: "Social Security Administration (SSA) Monthly Data for Combined Title II Disability and Title XVI Blind and Disabled Average Processing Time," Social Security Administration, accessed August 12, 2024, www.ssa.gov/open/data/Combined-Disability-Processing-Time.html.

Many applicants denied during the initial review experience further 210-day delays for reconsideration, according to SSA's FOIA website.[12] Across hearings offices, waits range from 9 months to 35 months.[13] We estimate that these additional wait times affect about 30 percent of the people who are approved at the reconsideration and hearings stages.

Looking ahead, the recent increase in the number of new disability claims threatens to significantly increase an already historically high backlog of people waiting for a disability decision. At the start of FY 2023, SSA had approximately 940,000 pending initial disability claims. By the end of FY 2023, pending claims had grown to 1.13 million.[14]

Evidence of Impact of Disability Programs on Applicants and Beneficiaries

A review of the literature on the impact of disability programs on outcomes for both applicants and beneficiaries reveal that a prolonged application process compounds existing challenges and undermines the financial and health protections provided by the disability programs.

Impacts for Applicants and Beneficiaries

People applying for disability benefits have often experienced significant declines in earnings and overall health in the years leading up to their application (von Wachter, Song and Manchester 2011). Using a health index based on 27 health indicators reported in the Health and Retirement Study, Heiss, Venti and Wise (2015) find that for older workers awarded SSDI benefits, their health declines by 22.7 percentage points from one year before application to one year after application. Schimmel and Stapleton (2012) focus on older workers and find that two years after the onset of a work-limiting condition, their earnings were 50 percent lower, and their poverty rates had nearly doubled. For the workers the researchers followed, the income from benefit programs only offset a small amount of the earnings decline.

Mudrazija and Smalligan (2019) use waves of the Panel Study of Income Dynamics to follow workers who develop new work-limiting health conditions or a health shock. The number of full-time workers who develop a new work-limiting health condition and are living in poverty almost doubles within two years following the onset of their health issue. Further, Mudrazija and Smalligan find that benefits receipt is low: after two years, more than half of these workers do not receive any form of public assistance. Within six years, over one-third of this group is still not receiving any public assistance.

Given the serious health and financial circumstances of people who apply for benefits, it should not be surprising that a prolonged benefit determination process has adverse impacts on applicants regardless of the ultimate benefit determination. For applicants denied disability benefits, the process erodes their ability to find a job. For applicants awarded benefits, a prolonged determination period postpones positive health impacts from benefit receipt and puts them at greater risk of negative financial outcomes, including bankruptcy, eviction, and foreclosures.

Impacts for Applicants Awaiting an Eligibility Determination

In the years leading up to being awarded disability benefits many applicants experience serious declines in health as their disabling condition(s) become more severe (Heiss, Venti, and Wise 2015). Some applicants must manage the time before a determination without health insurance, especially SSI applicants in states that have not chosen to expand their Medicaid program under the Affordable Care Act (Bundy 2022). Coe and colleagues (2014) estimated that one-quarter of SSDI beneficiaries go uninsured during the waiting period. Lack of health insurance is associated with a greater risk of decline in health (Baker et al. 2001). Applicants who are awarded benefits receive retroactive benefit payments, but these payments do not restore any adverse health effects from financial insecurity while awaiting a benefit determination.

Impacts for Denied Applicants

A crucial aspect of the SSDI and SSI benefits process is determining whether an applicant can work/earn above the substantial gainful activity level, $1,470 a month in 2023. Consequently, applicants for disability benefits are less likely to pursue employment while their benefit application is pending. Extended periods of unemployment can erode a worker's skills (Dinerstein, Megalokonomou, and Yannelis 2022; Edin and Gustavsson 2008). For SSDI applicants, Autor and colleagues (2015) find that a 2.1-month increase in initial processing time reduces the rate of having income over the long term above the substantial gainful activity level by 3.6 percent and long-run annual earnings by 5.1 percent. As discussed earlier, applicants currently must wait much longer than that. Weaver (2021, 1) finds that applicants denied benefits have "only somewhat more favorable health circumstances than beneficiaries." Compared with the general working-age population, denied applicants have a "high rate of poor health, high levels of poverty, and limited earnings."

Impacts for Applicants Ultimately Awarded Benefits

Once awarded benefits, an SSI beneficiary is in almost all cases eligible for Medicaid, and an SSDI beneficiary becomes entitled to Medicare after a 24-month waiting period from the start of benefit entitlement. In addition to the direct benefits of access to health insurance, research shows health benefits from the receipt of a stable cash benefit. Gelber and colleagues (2022) use SSA administrative data and discontinuities in the SSDI benefit formula to estimate that $1,000 more in annual SSDI payments decreases the annual mortality rate of lower-income beneficiaries by approximately 0.18 to 0.35 percentage points. Improved health and reduced mortality can also lead to reduced need for medical care. Berman (2021) concludes that a $100 increase in a beneficiary's monthly Social Security benefits leads to a $38 decline in monthly federal Medicare expenditures.

While awaiting an SSDI or SSI eligibility determination, applicants cope with financial insecurity in different ways. One fortunate group, generally formerly higher-wage workers, can receive temporary disability insurance benefits through their past employer (Smalligan and Boyens 2020). Others can receive unemployment insurance benefits or support from spouses or other friends or family. A common feature of these forms of financial support is their short-term nature (Coe et al. 2014).

Applicants experiencing a prolonged determination process may exhaust these temporary forms of support.

Deshpande, Gross, and Su (2021, 151) use SSA administrative records and a variation in disability determination rules related to age to consider key markers of financial distress, including bankruptcy, foreclosure, eviction, and home sale. They find these adverse financial events peak around the time of disability application. They also estimate that a "disability allowance reduces the likelihood of bankruptcy by 20 percent, foreclosure by 33 percent, and home sale by 15 percent" and conclude that this argues for a shorter waiting time for a decision. The General Accountability Office tracked applications and appeals from FY 2014 to FY 2019 and found 1.3 percent of those waiting for a decision filed for bankruptcy (48,000 applicants); 44.6 percent of this group were ultimately allowed. Another 45,000 filed for bankruptcy before applying for benefits, and 90,000 filed for bankruptcy after receiving a decision.[15] Silver and Zhang (2022) look at veterans' benefits and have similar findings associated with benefit receipt, including decreases in food insecurity and homelessness.

Some applicants awaiting a disability decision may try to rely on means-tested assistance, such as the Supplemental Nutrition Assistance Program, also known as SNAP. However, the Supplemental Nutrition Assistance Program, program has work requirements that a disability applicant may be unable to satisfy. While the Supplemental Nutrition Assistance Program provides an exemption for people with disabilities, the person must have qualified for SSDI or SSI to meet the standard for the exemption (Bergh and Rosenbaum 2023).

Impact of Wait Times and Reduced Service Levels on Program Participation

A more complicated application process can be expected to reduce program participation, as cross-program research on administrative burdens has documented (Herd et. al. 2023). Michaud, Moore, and Wiczer (2019) examine county-level variation in wait times for an SSDI decision between 1996 and 2014, controlling for differences in wealth and employment levels. They find that higher wait times are associated with lower applications in the following year. A one standard deviation variation, equal to about a 50-day longer wait time, is associated with a decrease in applications of 3.3 to 4.3 percent. During the period studied, wait times were generally much lower than they are today. We urge SSA to fund research replicating the study with more recent data as well as data for SSI applications.

SSA has limited options to manage funding shortfalls. Closing SSA field offices is one potential response. However, Deshpande and Li (2018, 213) find closing SSA field offices "lead to a persistent 16 percent decline in the number of disability recipients in surrounding areas, with the largest effects for applicants with moderately severe conditions and low education levels."

Participants in Social Security Programs Have Different Racial and Ethnic Backgrounds from Those Receiving Retirement Benefits

People of color are much more likely to participate in SSDI and SSI than in the Social Security retirement program. Data are limited as SSA does not collect race information on beneficiaries because of changes in how Social Security numbers are issued.[16] However, a recently added appendix to the SSA Annual Statistical Supplement shows the share of Social Security beneficiaries who are white, Black, and other races. Among retirement beneficiaries, 79 percent are white, 10 percent are Black, and 9 percent are categorized as other races. In contrast, white beneficiaries make up 67 percent of the SSDI program, while 19 percent are Black, and 11 percent are other races.[17] Favreault (2021) estimates the SSI receipt rates as a proportion of the overall population by race and ethnicity. Among white beneficiaries, 2.7 percent of adults ages 21 to 64 received SSI disability benefits compared with 5.6 percent of non-Hispanic Black adults and 2.3 percent of Hispanic adults.

What Does the SSA Discretionary Funding Illustrate about Equity Scoring?

Ultimately, both Congress and federal agencies are responsible for attending to fairness in outcomes. Congress can use the policy design and funding process related to appropriations discussions, debt limit negotiations, must-pass mandatory bills, and other vehicles to ensure adequate funding for progress toward fairness in outcomes. Federal agencies, via the implementation and administration of programs, then can apply that funding toward its affirmative duty to serve their constituents without undue delay or burden. By scoring funding bills, analysts can train the spotlight on these policy options and expand the types of debate and decisionmaking to support equity for underrepresented and underresourced groups. Without this information, the costs and negative outcomes of underfunding programs for those who can least afford the burden—such as people with disabilities and veterans—remain hidden.

Implications for Equity Scoring of Appropriations Bills

The discretionary budget process is an opportunity to integrate equity assessment of agency programs and activities into the annual analysis and review process already conducted by agencies, the Congressional Budget Office, the Office of Management and Budget, and congressional committees. While discussions of equity scoring of federal legislation have focused on mandatory bills, assessing how funding for discretionary administrative expenses limits or advances equity in outcomes is equally important; these are annual opportunities to uphold statutory and regulatory commitments to serve key populations. In particular, the analysis of how discretionary administrative expenses impact benefit programs could be included in the annual review process. Benefit programs based on legal entitlements are an important subset of these programs since administrative resource levels may enhance or impede benefits from reaching eligible applicants.

Equity assessment in the discretionary appropriations process would draw on many of the same principles of cost-benefit analyses already used to conduct regulatory reviews and in the review of agency equity plans. It would leverage and expand the knowledge and expertise of staff at every step of the federal budget process. Many of these same staff are also integral to designing, implementing, and overseeing equitable administration of program goals as part of other regular processes, such as performance management under the Government Performance and Results Act.[18] Because these management and budget processes are ongoing, analysts can begin incorporating equity assessments into their work now. For example, drawing on the approach used by the Urban Institute to analyze agency equity action plans, analysts can start by identifying the historic conditions that produce inequities in their programs and whether their policies address three key types of equity (Balu et al. 2023):

- **Procedural equity:** fairness of processes, often in terms of access to services
- **Distributional equity**: resource allocation and procurement that responds to a history of advantaging people and organizations with more resources
- **Structural equity:** designing policies and systems to reduce penalties for people with fewer resources and change incentives in ways that promote equity

Future work will explore further how the approach taken in this equity analysis of SSA's discretionary funding and its implications for access to benefits can be expanded and applied more broadly to other discretionary spending programs.

Implications for Future Funding of SSA's Operations

Using SSA as an example, we find that when SSA's administrative budget is under funding pressure, the impact of funding reductions is primarily felt in the disability programs. Although retirement claims are processed, retirees applying for benefits and people who need survivor's benefits also experience diminished service levels, such as through SSA's 800 phone service. Delayed decisions on claims for disability benefits create extended wait times and backlogs (Boyens and Smalligan 2024). These delays cause serious harm for many beneficiaries, with people already facing larger barriers in applying for benefits most acutely affected.

While benefits are fully funded through mandatory appropriations for all who meet the eligibility criteria, lack of agency resources limits who can apply for benefits, receive assistance on an application, or obtain a decision. Funding that is insufficient to fully process incoming claims and appeals does not remove the agency's responsibility to adjudicate claims since eligible individuals are legally entitled to benefits under the Social Security Act. Claims not processed in one year roll over to the next. As delays grow, they impose larger burdens on both applicants and the agency, raising administrative compliance costs on the individual and the unit cost of processing claims for SSA.

Changing how administrative resources are provided to SSA for disability determinations could improve fairness in outcomes for all Social Security applicants and beneficiaries, while addressing the disparate treatment of applicants and beneficiaries with disabilities and preventing future harm. Options include providing funding through mandatory appropriations for disability determinations with levels tied to trends in applications and appeals and sufficient to maintain historically acceptable processing times and pending case levels.

Another option is to create a budget-scoring rule that incentivizes appropriators to fund disability determinations at levels consistent with application rates. The approach would be similar to the scoring rules for student loans, where failure to adequately fund the program results in a penalty to the relevant appropriations committee's funding allocation (see appendix A).

To provide SSA with more stability during the regular appropriations process, another option would be to provide a portion of SSA's budget through an advance appropriation. This would ease disruptions in funding that often occur during the discretionary budget process (such as lapses in appropriations and temporary continuing resolutions) and allow appropriators more time to assess incoming claims, appeals rates, and ultimate funding needs.

Appendix A. The Federal Pell Grant Program

The Pell grant program provides an enlightening example of how the congressional appropriations and budget process responds both to political priorities and constraints. The Pell grant program is a needs-based grant to support students seeking higher education. The Congressional Research Service states the Pell grant program “is often referred to as a quasi-entitlement because for the most part, eligible students receive the Pell grant award level calculated for them without regard to available appropriations.” Consequently, the Congressional Research Service explains that “When the discretionary appropriation is too small, the program carries a shortfall into the subsequent fiscal year” (Dortch 2023, 2).

The appropriations committees must manage the competing demands for limited discretionary appropriations and entitlement for benefits for both the SSA administrative budget and the Pell grant program. In the case of SSA, underfunding the cost of processing disability claims has led to large backlogs of pending cases. In the case of Pell, many years of underfunding grants before 2006 led to large funding shortfalls. In other words, the quasi-entitlement feature of the Pell grant shifted the pressure from program underfunding for pending applications to program fund balances. Dortch (2023, 24) explains a highly unusual mechanism Congress instituted to address the Pell problem:

> Congress took steps in FY2006 to limit the possibility of large accumulated funding shortfalls in the future. H.Con.Res. 95 (109th Congress) established a permanent rule that applies to the scoring of the Pell Grant program by the Congressional Budget Office (CBO). The rule provides that if the appropriation of new discretionary budget authority enacted for the program is insufficient to cover the full estimated costs in the upcoming year—including any funding surplus or shortfall from prior years—the budget authority counted against the bill for the program will be equal to the adjusted full cost (i.e., total need).

The permanent rule Congress adopted in 2006 has kept Pell finances in balance. This permanent rule shows how a scoring rule can balance the many pressures facing the appropriations process, and it provides a model Congress could use to address SSA underfunding.

Notes

[1] Poverty estimates shown here use the US Census Bureau's Supplemental Poverty Measure, which accounts for people's location, homeownership status, out-of-pocket medical spending, taxes, and the value of in-kind benefits (food stamps, for example).

[2] Janis Bowdler and Benjamin Harris, "Racial Inequality in the United States," US Department of the Treasury, July 21, 2022, https://home.treasury.gov/news/featured-stories/racial-inequality-in-the-united-states.

[3] "Income Sources of Older Households," US Census Bureau, February 8, 2022, https://www.census.gov/newsroom/press-releases/2022/income-sources-older-households.html.

[4] See US Const. art. XIV, § 1.

[5] Griggs v. Duke Power Co., 401 US 424, 430 (1971).

[6] Discretionary appropriations are the primary, but not the only, source of administrative funding. Some agency operations are funded through mandatory appropriations, dedicated user fees or receipts, or other sources. For more information on funding of administrative expenses, see Saturno and Lynch (2023).

[7] For more information about the federal budget process, see the Congressional Budget Office's "Budget Concepts and Process," https://www.cbo.gov/topics/budget/budget-concepts-and-process.

[8] See 20 CFR § 404.1740(b).

[9] See, for example, 42 USC § 3608(d).

[10] See, for example, DOJ Title VI Legal Manual, page VII.2.

[11] For this discussion we exclude funding for SSA's program integrity activities, including continuing disability reviews and SSI redeterminations. Funds for these purposes are provided through a special budgetary mechanism that permits the appropriations committees to provide that full amount needed for these purposes without constraining what is provided for other programs in the appropriations bill. Distinguishing the appropriation for SSA's main operations from program integrity activities is important because only appropriations for main operations can be used to fund the processing of disability claims or respond to telephone calls from individuals preparing a retirement claim. From 2010 to 2023, SSA's funding for main operations grew by 24 percent whereas funding for program integrity activities grew by 135 percent.

[12] Social Security Administration, "Initial and Reconsideration Processing Times Data as of 02-24-23," February 24, 2023, https://www.ssa.gov/foia/resources/proactivedisclosure/2023/Initial and Reconsideration Processing Times Data as of 02-24-23.xlsx. (This link will download an Excel spreadsheet.)

[13] Social Security Administration, "Average Wait Time Until Hearing Held Report (For the Month of May 2024)," Hearings and Appeals, Datasets, accessed May 2024, available at https://www.ssa.gov/appeals/DataSets/archive/archive_data_reports.html.

[14] Social Security Administration, "FY 2023 Actual Performance," Budget, 2023, https://www.ssa.gov/budget/assets/materials/2023/2023APM.pdf.

[15] Government Accountability Office, letter to Senator Bernard Sanders and Representative John Larson, "Social Security Disability: Information on Wait Times, Bankruptcies, and Deaths among Applicants Who Appealed Benefit Denials," August 13, 2020, https://www.gao.gov/assets/710/708835.pdf.

[16] Patricia P. Martin, "Why Researchers Now Rely on Surveys for Race Data on OASDI and SSI Programs: A Comparison of Four Major Surveys," Research and Statistics Note 2016-01, Social Security Administration,

Office of Retirement and Disability Policy, January 2016, https://www.ssa.gov/policy/docs/rsnotes/rsn2016-01.html.

[17] "Appendix E. Selected Statistics on OASDI Benefits in Current-Payment Status by Race," *Annual Statistical Supplement, 2022*, Social Security Administration, Office of Retirement and Disability Policy, https://www.ssa.gov/policy/docs/statcomps/supplement/2022/apne.html.

[18] General Services Administration, "Performance Framework," accessed July 19, 2024, https://www.performance.gov/about/performance-framework/.

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About the Authors

Jack Smalligan is a senior policy fellow in the Income and Benefits Policy Center at the Urban Institute and is the principal investigator for the Social Security for Tomorrow's Workforce project. He analyzes the interactions across disability, retirement, and paid leave policy. Previously, he was deputy associate director at the Office of Management and Budget. Serving five administrations since 1990, Smalligan developed policies that have been incorporated into many pieces of legislation. In 2012, he was a visiting fellow at the Brookings Institution, where he analyzed the Social Security Disability Insurance program. Smalligan received a master's degree in public policy from the University of Michigan.

Chantel Boyens is a principal policy associate in the Income and Benefits Policy Center. Her current work focuses on interactions between Social Security programs and retirement, pensions, disability, and paid leave policy. Before joining Urban, Boyens was acting branch chief and senior program examiner in the Income Maintenance Branch of the Office of Management and Budget for nine years and across two administrations. Boyens received a master's degree in public policy from American University.

Karishma Furtado is a senior research associate in the Office of Race and Equity Research and a former equity scholar at the Urban Institute. She uses human-centered data, research, and storytelling to catalyze and measure impact, facilitate accountability, deepen understanding, and imagine what's possible on the path to racial equity. Before joining Urban, Furtado was a founding staff member of Forward Through Ferguson, a St. Louis–based nonprofit focused on systems change to achieve racial equity; a staff member of the Ferguson Commission; and a coauthor of the Ferguson Commission report. Furtado received her bachelor's degrees in biology and public policy from the University of Chicago, and master's and doctorate degrees in public health with a specialization in biostatistics and epidemiology from Washington University in St. Louis.

Rekha Balu is the director of federal equity initiatives and co–vice president of the Office of Race and Equity Research at the Urban Institute, where she leads research and policy programs that deploy analytics and evidence to inform government agencies on how to advance equity. Balu joined Urban from MDRC, where she was a senior fellow and director of the Center for Applied Behavioral Science. She has partnered with federal agencies and grantees around the country to help them base their decisions on data and evidence. Balu has an undergraduate degree from Northwestern University, a master of education degree from the Harvard Graduate School of Education, and a master's degree in economics from Stanford University. She earned her doctorate in the economics of education from Stanford University.

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500 L'Enfant Plaza SW
Washington, DC 20024
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Suite 303
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