



The case for reforming the disability grids

DECEMBER 9, 2019

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KEY FINDINGS

1

DISABILITY DEPENDENCY
HAS GROWN TO RECORD LEVELS.



2

DISABILITY INSURANCE'S
INSOLVENCY IS ON THE BUBBLE.



3

THE DISABILITY GRIDS ARE
OUTDATED AND NOT REFLECTIVE
OF TODAY'S ECONOMY.



4

THE DISABILITY GRIDS USE
OUTDATED AND INCONSISTENT
DEFINITIONS OF AGE.



5

THE DISABILITY GRIDS DEFINE AGE IN A WAY THAT IS
INCONSISTENT WITH PUBLIC OPINION.



BOTTOM LINE:

THE TRUMP ADMINISTRATION HAS A GREAT OPPORTUNITY TO
FIX THE GRIDS AND STABILIZE THE DISABILITY SYSTEM.

Background on federal disability benefits

The Social Security Administration (SSA) administers two major disability programs. The first, created by Congress in 1956, is the Social Security Disability Insurance (SSDI or disability insurance) program. SSDI provides cash benefits to former American workers who become disabled and their families, financed through Social Security taxes on workers and employers.¹ Workers' taxes are kept in the Social Security Disability Insurance Trust Fund, which is separate from the retirement trust fund. Workers must have worked in five of the last 10 years and be fully insured to receive SSDI.²

In 1972, Congress established the Supplemental Security Income (SSI) program. SSI is a welfare program that provides cash benefits to aged, blind, and disabled individuals who have limited resources and income.³ Unlike SSDI, no work history is required for SSI recipients to receive benefits. In most states, SSI recipients are automatically eligible for Medicaid, and many are also eligible for food stamps.⁴

At the programs' introduction, Congress regarded disability as early retirement insurance for the "totally and permanently disabled."⁵ But today, to receive SSDI or SSI benefits, an individual does not need to be permanently or totally disabled. To meet the definition of disability, medical conditions or impairments must be expected to last for more than a year or be expected to result in death.⁶

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The eligibility pathway for disability benefits

All disability applicants for both federal programs are filtered through the agency's five-step determination process.⁷

If individuals meet preliminary requirements—such as not earning over a certain amount of income and having a condition that has lasted or is expected to last at least a year or result in death—their condition is checked against the agency's "Listing of Impairments."⁸ Individuals who have these conditions, or conditions of equal severity, are awarded benefits.

Conditions include musculoskeletal disorders, including but not limited to severe walking limitations; a significantly diminished ability to reach, pull, push, and perform daily tasks related to personal hygiene and meal preparation; cancer; special senses and speech challenges; respiratory disorders; cardiovascular disorders, digestive conditions; skin disorders; congenital disorders; neurological disorders; mental disorders; immune system disorders; and more.

Effectively, individuals with serious, verifiable medical conditions or equivalent conditions can be awarded disability benefits, assuming they meet other eligibility criteria.⁹

The disability system was intended to serve this type of population—individuals who have serious disabilities that significantly limit their ability to work and have nowhere else to turn.

However, individuals who do not have the listed conditions—or conditions of equal severity—can also qualify for disability benefits through the agency's medical-vocational guidelines, often referred to as the "grids."¹⁰ These grids go beyond just looking at impairments and instead make a determination about an individual's likelihood of returning to work, based on a variety of factors. Importantly, disability alone is not the determining factor.



**APPLICANTS
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PROCESS.**

How do the grids work?

There are three separate grids used to evaluate applicants.¹¹ These grids consider an individual's conditions and their ability to adjust to professions outside of their career background.¹²

An individual is assessed and assigned "residual functional capacity," defined as the most they can do despite their limitations.¹³ For example, one grid filters applicants who are deemed to only be capable of "sedentary" work or work that requires little movement. The additional grids assess individuals who are capable of light or medium work.¹⁴

This work assessment is critical, as it determines which grid individuals go through, all of which consider age, work experience, and education differently.

At this point in the process, the agency has made a determination that applicants have some capacity for future work, based on their impairments alone. These are not individuals who are completely disabled or debilitated, by definition, as they do not have conditions that meet or are of equal severity as a condition on the medical listings.¹⁵

However, despite having some remaining capacity for work, these individuals can still qualify for full, lifelong disability benefits because, under the grid structure, it is not physical or mental condition alone that is taken into account. Indeed, actual capacity for work is only one of many factors considered.

Instead, the grids make a determination about an individual's *likelihood* of adapting to a different type of work based on their education, age, work experience, and even fluency in the English language.¹⁶

In short, this process ultimately pits individuals with severe, life-altering disabilities against individuals with manageable work limitations who, by the agency's own definition, have some remaining capacity to work.

It also increases the likelihood of disability being treated as long-term unemployment for individuals who may be capable of returning to the workforce rather than a safety net for individuals with the most serious disabilities.¹⁷

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Disability dependency has grown to record levels in recent years

While enrollment has begun to taper off, both disability programs recently experienced record-high enrollment.

SSDI enrollment reached its peak in 2014, surpassing 9.4 million.¹⁸ Enrollment climbed all but one year from 1982 to 2014—nearly 30 years of consecutive growth.¹⁹

Similarly, SSI enrollment of working-age adults has been climbing, reaching a record-high mark of 4.9 million in 2013.²⁰ Between 1974 and 2014, working-age enrollment in SSI dipped only twice, climbing every year otherwise.²¹ **Working-age adults now make up 58 percent of the program, compared to just 38 percent in 1974.**²²

By far, the fastest growth has come from individuals who are working age, ages 18-64. In fact, the number of seniors in SSI is actually lower than it was in 1974.

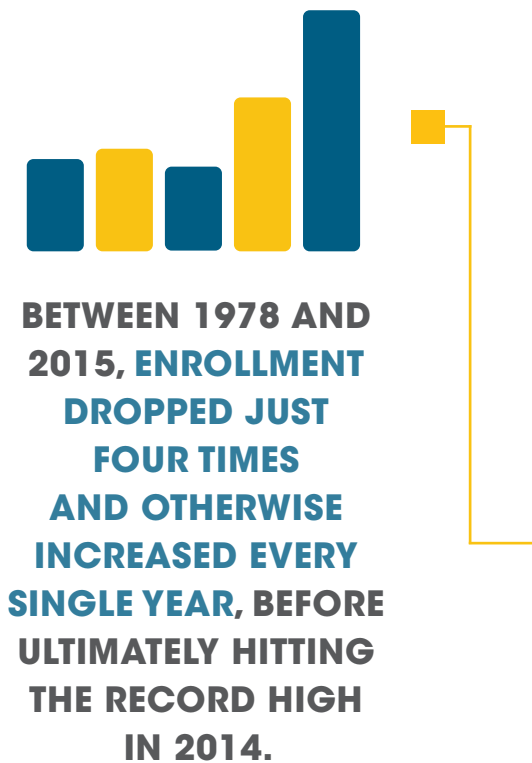
However, amongst working-age adults, enrollment has skyrocketed, increasing by 219 percent since 1974.²³

Overall, unduplicated enrollment amongst working-age adults in both programs has also hit record levels. It hit a high-water mark in 2014, with total enrollment surpassing 12.96 million.²⁴ Between 1978 and 2015, enrollment dropped just four times and otherwise increased every single year, before ultimately hitting the record high in 2014.

Thanks to today's booming economy, enrollment has been tapering off in recent years, dropping every year since 2015—the longest sustained enrollment decline in the history of the disability system.

But even after this decline, the number of working-age adults on SSDI and SSI is still twice as high as it was in the 1990s.²⁵ This growth is far outpacing the growth of the working-age population, growing nearly twice as fast.²⁶ This is particularly concerning given that workers fund these programs through taxes.

Working-age adult enrollment in both programs also remains significantly higher than pre-Great Recession levels: in December 2006, before the recession began, enrollment was below 11 million.²⁷ Enrollment dipped slightly in 2011, but then resumed climbing, even as the economy took off, remaining closer to 13 million over the last five years.²⁸



Disability insurance's solvency is on the bubble

Just last year, the Social Security Administration trustees warned Congress in their annual report that the disability trust fund would be fully depleted by 2032.²⁹ This year's annual report presents a more optimistic forecast, given a booming economy with record-low unemployment, declining enrollment in the program, and more workers paying in.

However, the trustees still warn that the trust fund could be depleted within roughly the next two decades. Even worse, total costs for all of Social Security are projected to exceed total income starting in 2020.³⁰

Indeed, over the past decade, the program has often been just one or two years from insolvency.

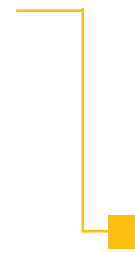
DISABILITY INSURANCE IS JUST ONE BAD ECONOMY FROM INSOLVENCY

REPORT YEAR	PROJECTED INSOLVENCY	DIFFERENCE
2010	2018	8
2011	2018	7
2012	2016	4
2013	2035	22
2014	2016	2
2015	2016	1
2016	2023	7
2017	2023	6
2018	2032	14
2019	2052	33

Source: Social Security Administration

Thanks to the booming Trump economy, in just one year, more than two decades have been added to disability's projected solvency.³¹ The projected solvency of the program is now more secure than any time in recent history.

This demonstrates just how quickly the forecast can shift. Just one significant downturn in the economy could change the outlook right back. **Disability is just one bad economy away from insolvency.** This reiterates the importance of fixing systemic problems with the programs now, while the economy is strong, in order to ensure the program is sustainable.



THE PROGRAM HAS OFTEN BEEN JUST ONE OR TWO YEARS FROM INSOLVENCY.

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The grids are outdated and do not reflect the modern economy

For individuals who make it into the grid process, the agency must decide—considering age, education, and previous work experience—if the individual can reasonably adjust to other types of jobs that exist in the economy.³² But many of the data sources the agency uses to assess the types of jobs in the economy are in significant need of updating.

Currently, the federal government uses occupational information from the Department of Labor, the Census Bureau, and more—but some of the sources the agency uses are significantly outdated. In fact, the Dictionary of Occupational Titles (DOT)—which the agency says is their primary data source for determining whether or not occupations exist in the economy—has not been updated since President George H.W. Bush was in office.³³

The Social Security Administration is in the process of developing a new data system to replace the DOT, expected to launch in 2020, but even when it launches, it will only be updated every five years.³⁴ Keeping these titles fresh is critical to protecting the integrity of the disability programs.

The grids are not reflective of changes in the labor force

Given their outdated nature, the current structure of the grids also fails to match the profile of America's labor force today.

For example, the grids consider individuals to be "advanced age" and nearing retirement when they reach 55 years old.³⁵ They also consider individuals between the ages of 50 and 54 to be "closely approaching advanced age."³⁶

However, individuals now reach their peak earnings well into middle age, meaning individuals considered to be "approaching advanced age" by the disability programs have not even reached the pinnacle of their careers yet.³⁷ Regardless, the current structure of the grids slants towards these older individuals and is more likely to consider them disabled.

The modern economy is also as accommodating as it has ever been for individuals with disabilities and individuals with manageable work limitations. More than 340,000 individuals with disabilities joined the labor force in 2016 alone.³⁸

Employed individuals with disabilities are also twice as likely as individuals without disabilities to be self-employed, a sector of the economy that has boomed in recent years, given advances in technology and Internet-based commerce.³⁹ New industries like ridesharing have opened the door even wider for individuals with manageable work limitations to get back into the workforce.

Individuals with work limitations are welcomed with open arms in today's economy, as they should be, but the disability system remains stuck in the past.

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The grids define age in a way that is inconsistent with other common definitions and interpretations

The disability program’s definitions of advanced age and “closely approaching retirement” age are out of alignment with the common understanding of these terms in American culture, in other government programs, and even within other Social Security programs.

The disability grid for individuals deemed capable of medium work defines “closely approaching retirement age” as 60 years old or older. But the Social Security Administration itself, for purposes of retirement benefits, defines normal retirement age as 67 years old.⁴⁰ So the same agency deems 60-year-olds to be “closely approaching” retirement age seven years before an individual meets the agency’s defined full retirement age and before individuals can even collect early retirement benefits.⁴¹

The agency’s current definition of those approaching retirement age is also out of sync with how other federal welfare and entitlement programs treat seniors and individuals who are growing older. For example, Medicare eligibility begins at age 65.⁴² Likewise, Medicaid eligibility for seniors begins at age 65.⁴³

The grids also define “advanced age” as an individual 55 years old and older and, consequentially, they classify those who are just 50-54 as closely approaching advanced age—but individuals in their early fifties have not even reached their peak earning years.

Misclassifying individuals as advanced age or near retirement is not without consequence: by making it easier for these populations to receive disability benefits, current policy does not just increase dependency on these benefits—it has a real fiscal impact on the solvency of the disability trust fund and the broader sustainability of the retirement system.



**INDIVIDUALS
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The grids allow the disability safety net to be used as early retirement

As noted, former workers can obtain early retirement benefits at age 62. In order to do this, their benefits are cut by up to 30 percent as a penalty.⁴⁴ However, if individuals can obtain disability benefits instead of taking early retirement, they can avoid the reduction in retirement benefits. This allows for the full collection of disability benefits until age 67 and then full retirement benefits, resulting in not only higher disability costs but higher retirement costs.

Individuals who no longer have to take early retirement benefits at a reduced rate can instead access disability benefits, then transition to full retirement benefits upon reaching retirement age.

In fact, individuals who are between 60 years old and full retirement age make up the biggest chunk of the SSDI program.⁴⁵

Absent the ability to use disability as early retirement, many of these individuals with manageable work limitations may have opted to take early retirement benefits or continued working—but because they have access to disability benefits, there is no need to do so, keeping costs for both SSDI and the retirement program higher.



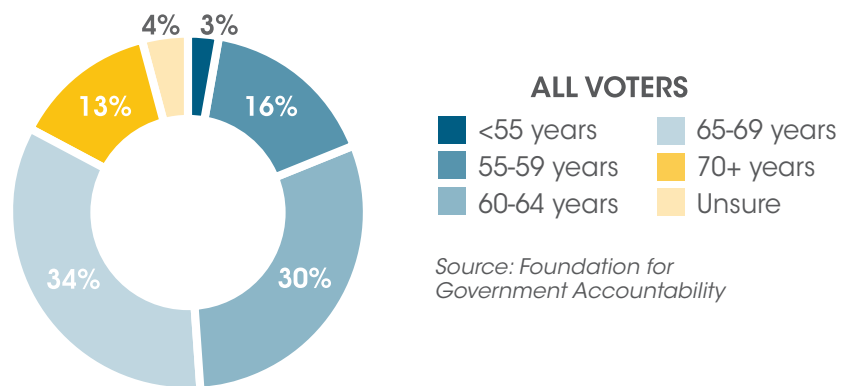
**DISABILITY IS BEING
USED AS AN EARLY
RETIREMENT SYSTEM,
RATHER THAN A
SAFETY NET.**

The grids define advanced age in a way that is inconsistent with public opinion

The public also has a much different interpretation of “advanced age.” According to recent public opinion polling, just 16 percent of voters believe advanced age should be defined as 55 to 59 years old.⁴⁶ Three quarters of voters believe advanced age should be defined no earlier than 60 years old, with nearly half believing advanced age should be defined as 65 years old or older.

THREE QUARTERS OF VOTERS BELIEVE ADVANCED AGE SHOULD BE 60 YEARS OLD OR HIGHER

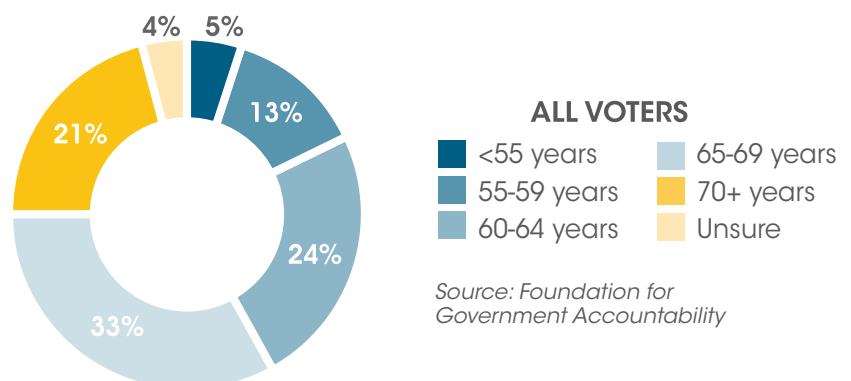
Voters’ opinions on what age should be considered advanced age



More specifically, four-fifths of voters believe adults are capable of learning new work skills into their 60s and beyond.⁴⁷ More than one in five voters believe this capacity for learning new skills does not diminish until someone surpasses age 70 or later.⁴⁸ Just 18 percent of voters believe work adaptability diminishes before age 60.⁴⁹

NEARLY 80 PERCENT OF VOTERS BELIEVE ADULTS ARE CAPABLE OF LEARNING NEW SKILLS INTO THEIR 60S

Voters’ opinions on when work adaptability begins to diminish



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Just 18 percent of voters believe work adaptability diminishes before age 60.

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The Trump administration has a great opportunity to fix the grids and stabilize the disability system

America's disability programs are a vital safety net for former workers with truly debilitating conditions, seniors, and children. But the current, outdated structure of the medical-vocational grids threaten the long-term sustainability of the program for those who need it.

The Trump administration has a great opportunity to modernize the medical-vocational grids. In fact, the administration has already begun the process of evaluating the grids and how they can be improved, in order to preserve the program for the truly needy.⁵⁰

1. AS THEY REVISE THE RULES, THE TRUMP ADMINISTRATION SHOULD INCREASE THE GRIDS' AGE FACTORS BY AT LEAST FIVE YEARS.

This modernization would reflect advancements in the economy and culture. It would also bring age definitions closer in line with other federal welfare and entitlement programs, including other programs administered by SSA.

GROUP	STATUS QUO	RECOMMENDED CHANGE
Closely approaching retirement age	60 years old or older	65 years old or older
Advanced age	55 years old or older	60 years old or older
Closely approaching advanced age	50-54 years old	55-59 years old
Younger individual	18-49 years old	18-54 years old

“Age definitions would be brought closer in line with other federal welfare and entitlement programs, including other programs administered by SSA.”



This change would account for economic advancements, simplify the grid process for administrators, bring the rules more in line with other government programs, and reflect where the public stands on the issue.



2. THE TRUMP ADMINISTRATION SHOULD ALSO STRONGLY CONSIDER REDUCING THE NUMBER OF AGE GROUPS INCLUDED IN THE GRIDS.

Currently, there are five age groups in the rules.⁵¹ But given the advancements in the American economy, culture, and work expectations, this structure is out of date.

The Trump administration should consider doing away with this archaic structure and revising the grids down to two age groups—working-age adults between the ages of 18 and 64, and those of advanced age, defined as individuals who are 65 years old or older.

Individuals below age 65 would still be able to qualify for benefits through the grids. Education, work experience, and impairments would also still be taken into consideration—but greater weight would be placed on the likelihood of an individual returning to work based on their overall condition, rather than arbitrarily considering age so heavily as a disabling factor.

This change would account for economic advancements, simplify the grid process for administrators, bring the rules more in line with other government programs, and reflect where the public stands on the issue.

The disability system is an important safety net for individuals who truly cannot work. But it is clear that reform is needed to protect the program for these truly needy individuals and to ensure the sustainability of the program for future generations.

APPENDIX 1

WORKING-AGE ADULT ENROLLMENT IN SSI HAS SKYROCKETED

SSI enrollment of 18-64 year olds, by year

1974	1,503,155	1996	3,568,393
1975	1,699,394	1997	3,561,625
1976	1,713,594	1998	3,646,020
1977	1,736,879	1999	3,690,970
1978	1,747,126	2000	3,744,022
1979	1,726,553	2001	3,811,494
1980	1,730,847	2002	3,877,752
1981	1,702,895	2003	3,953,248
1982	1,655,279	2004	4,017,108
1983	1,699,774	2005	4,082,870
1984	1,780,459	2006	4,152,130
1985	1,879,168	2007	4,221,920
1986	2,010,458	2008	4,333,096
1987	2,118,710	2009	4,451,288
1988	2,202,714	2010	4,631,507
1989	2,301,926	2011	4,777,010
1990	2,449,897	2012	4,869,484
1991	2,641,524	2013	4,934,272
1992	2,910,016	2014	4,913,072
1993	3,148,413	2015	4,888,555
1994	3,335,255	2016	4,845,735
1995	3,482,256	2017	4,805,112

Source: Social Security Administration

APPENDIX 2

TOTAL WORKING-AGE ENROLLMENT IN THE DISABILITY SYSTEM HAS REACHED RECORD LEVELS

Unduplicated enrollment of working-age adults in SSI & SSDI, by year

1978	4,676,450	1998	8,090,686
1979	4,662,528	1999	8,311,949
1980	4,662,546	2000	8,519,241
1981	4,570,071	2001	8,799,998
1982	4,366,314	2002	9,118,926
1983	4,367,241	2003	9,510,138
1984	4,460,188	2004	9,792,950
1985	4,591,316	2005	10,094,657
1986	4,812,143	2006	10,646,193
1987	4,904,785	2007	11,000,748
1988	5,012,435	2008	11,486,100
1989	5,155,787	2009	11,997,296
1990	5,395,261	2010	12,570,871
1991	5,743,614	2011	12,449,120
1992	6,249,217	2012	12,734,299
1993	6,707,127	2013	12,936,588
1994	7,103,399	2014	12,963,468
1995	7,398,942	2015	12,933,227
1996	7,691,134	2016	12,809,399
1997	7,818,216	2017	12,667,828

Source: Social Security Administration

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