

Task Force on Artificial Intelligence, Emerging Technology, and Disability Benefits

Phase One Report

April 2025



NATIONAL ACADEMY
OF SOCIAL INSURANCE

Acknowledgments

Founded in 1986, the National Academy of Social Insurance is a nonprofit, nonpartisan organization made up of the nation's leading experts on social insurance policy, practice, research, and innovation. From Social Security and Supplemental Security Income; to Medicare, Medicaid, and the Affordable Care Act; to Workers' Compensation and Unemployment Insurance; to the Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, and income-boosting tax credits, America's social insurance ecosystem serves as the bedrock of economic protection against the risks of life — such as when we retire, lose a job, experience disability/illness, or lose a family breadwinner.

For nearly 40 years, the Academy and its powerful, diverse member network have championed the safeguarding, strengthening, and modernizing of social insurance and worked to increase public understanding of how it contributes to economic security. Reports of the National Academy of Social Insurance aim to assess policy options without advocating for any particular option. The options and perspectives discussed in this report do not necessarily reflect the views of individual members of the Task Force or of the organizations with which they are affiliated.

The National Academy of Social Insurance gratefully acknowledges the work of the individuals who serve on the Task Force on Artificial Intelligence, Emerging Technology, and Disability Benefits. Their affiliations represent their positions at the time of the Task Force's deliberations and report publication.

As with all Academy reports, this report went through peer and Board review to ensure that it meets the organization's standards for clarity, completeness, accuracy, and objectivity. Special thanks to Paul Van de Water for serving as the final Board reviewer of this work.

To learn more about the Academy's work, please contact Rebecca Vallas, Chief Executive Officer at rvallas@nasi.org



Task Force Members:

Chantel Boyens, *Urban Institute*, Co-Principal Investigator

Jack Smalligan, *Urban Institute*, Co-Principal Investigator

Jen Burdick, *Community Legal Services of Philadelphia*, Co-Chair

David Camp, *National Organization of Social Security Claimants' Representatives*, Co-Chair

Henry Claypool, *American Association of People with Disabilities and Center for Democracy and Technology*, Co-Chair

Tracey Gronniger, *Justice in Aging*, Co-Chair

Ariana Aboulafia, *Center for Democracy and Technology*

Ly Xīnzhèn Zhǎngsūn Brown, *National Disability Institute*

Ashley Burnside, *Center for Law and Social Policy*

Fay Lomax Cook, *Northwestern University*

Jeff Cruz, *American Federation of Government Employees*

Indivar Dutta-Gupta, *National Academy of Social Insurance*

Hannah Groch-Begley, *The Roosevelt Institute*

Mia Ives-Ruble, *Center for American Progress*

Dom Kelly, *New Disabled South*

Aparna Mathur, *Amazon*

Graham McDonald, *Urban Institute*

Tom Nicholls, *AARP*

Shaun O'Brien, *AFSCME*

Aron Paquette, *Unum*

Rylin Rodgers, *Microsoft*

Steven Rollins, *Former Associate Commissioner, Social Security Administration*

Meilani Santillán, *Code for America*

Tim Shaw, *Aspen Institute*

Jude Soundar, *Microsoft*

Emerson Sprick, *Bipartisan Policy Center*

Shelley Washington, *AFGE Local 1923*

David Weaver, *University of South Carolina*

Darren Webb, *Mindset Care*

David Wittenburg, *Westat*

Dora Mendelson, *National Academy of Social Insurance*, Research Assistant

Rebecca Vallas, *National Academy of Social Insurance*, Project Director

Executive Summary

The National Academy of Social Insurance formed the Task Force on Artificial Intelligence (AI), Emerging Technology and Disability Benefits to assess and inform how the Social Security Administration approaches the use of AI in the Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) programs for purposes of determining benefit eligibility. The goal of the Task Force and this accompanying report is to bridge general AI guidance to the Social Security Administration's (SSA) specific programs and challenges. SSA processes millions of disability claims a year. Eligibility for SSDI and SSI is strict, and claims undergo a complex, multi-step determination process before benefits can be paid to eligible individuals. Currently, SSA faces an unprecedented backlog of cases waiting for review, imposing long, costly wait times on applicants. SSI and SSDI are critical programs that often act as a lifeline for people with disabilities or disabled family members. They are intended to provide income support due to significant work-limiting disability, old age, and/or death of a spouse or parent.

The Academy Taskforce brings together experts on disability policy, including legal and social service practitioners who assist disability claimants in accessing benefits and services, and technology experts from the private and non-profit sectors. The Taskforce also consulted experts from within government, including the Social Security Administration's Office of the Chief Information Officer and the Chief AI Officer.¹ The Taskforce, its Co-Chairs and the Co-Principal Investigators conducted a series of meetings and informal interviews to gather information, learn and share insights across areas of expertise, and produce the report that follows.

In this report, we begin by describing the challenges SSA faces and how it is already using AI in the disability determination process. We then discuss the risks involved in using AI in the context of disability benefits, including types of bias that must be prevented and mitigated, followed by the potential opportunities for program improvement that AI may provide. Next, we summarize existing guidance to Federal agencies on the use and development of AI in programs and contexts that are potentially "rights-impacting."

We conclude that additional principles and guardrails are needed to guide the use of AI in the Social Security disability determination process. We identify four principles that should guide the Agency's approach to development and use of AI and act as a "north star" for future regulations, guidance and policies. These principles are:

- Do not use AI to limit or impede the rights of applicants and beneficiaries
- Prioritize human decision making in disability determinations
- Prevent, reduce and mitigate bias
- Improve fairness

In addition to these guiding principles, the Task Force has also identified a set of guardrails intended to help protect against the risks identified in this report.

The Task Force is invested in preventing potential harm and ensuring responsible use of AI, especially as new uses are introduced, and AI applications evolve. The Task Force has identified the following guardrails for the testing, deployment, and evaluation of AI:

- Establish internal and external governance processes for oversight of AI
- Make tools that are explainable, transparent, testable, accessible to people with disabilities, and subject to independent evaluation
- Strengthen procurement policies
- Conduct ongoing monitoring and evaluation of AI applications
- Protect data and personal privacy

Together, these principles and guardrails are intended to serve as a foundational framework for the development of more detailed policies and procedures governing use of AI in Social Security programs. More work is needed to ensure that the potential benefits and costs stemming from the use of AI in SSA programs are fully understood and evaluated, and that applicant and beneficiary rights are protected. As this technology rapidly evolves, we urge stakeholders across government, the private and non-profit sectors, and academia to engage in ongoing monitoring of the opportunities and challenges identified in this report and to build upon this framework.