

commenters and our responses are summarized below.

*Comment:* Many commenters raised concerns regarding the adequacy of the training that would be provided to interviewers and decisionmakers (particularly single decisionmakers).

*Response:* We will ensure that the interviewers and decisionmakers who participate in our tests will be highly trained individuals who are well versed in both the disability and nondisability aspects of the disability programs and are individuals who have the necessary knowledge, skills, and abilities to conduct personal interviews, develop evidentiary records, and fully adjudicate disability claims, as appropriate. These individuals will also be able to call on other SSA resources, including medical and technical support personnel, to provide advice and assistance in the claims process.

*Comment:* Several commenters raised concerns regarding the apparent lack of involvement of the medical consultant in making disability determinations because the medical consultant would not be required to sign the disability determination forms used to certify the determination of disability to us.

*Response:* The fact that we intend to test a model or combinations of models where the determination of disability is made by a single decisionmaker does not mean that the medical consultant is being removed from the decisionmaking process. The decisionmaker will consult with the medical consultant whenever appropriate. This means that the decisionmaker will make reasonable efforts to ensure that a qualified pediatrician or other appropriate specialist evaluates the claim whenever a determination of disability is required in claims filed on behalf of children under age 18 claiming SSI payments based on disability. Similarly, before making a determination that an individual is not under a disability in any case which indicates the existence of a mental impairment, the decisionmaker will make every reasonable effort to ensure that a qualified psychiatrist or psychologist completes the medical portion of the case review and any applicable residual functional assessment. In addition, the decisionmaker will consult with the medical consultant in all other situations where the decisionmaker finds that a consultation is appropriate. However, the single decisionmaker concept is based on the premise that the decisionmaker is fully competent to make an initial determination when an individual files an application for benefits based on disability. It also gives the decisionmaker flexibility to make

such determinations without having to wait for the medical consultant to take part formally in the determination.

*Comment:* Several commenters wanted us to include quality assessments of accuracy in our evaluation of all possible approaches to improved disability determinations. The commenters' concerns stem partially from the use of a single decisionmaker in some of the proposed models and from the fact that medical consultants will not be required to sign the disability determination forms used to certify the determination of disability to us.

*Response:* Our evaluation of the models we test will include quality assurance procedures to ensure a thorough assessment of the accuracy of the disability determinations made under the test procedures. As previously noted, decisionmakers will comply with the statutory requirements regarding the use of medical consultants in SSI childhood disability claims, and in all denials of claims based upon mental impairments. In addition, such consultation will take place with respect to any other claim in which the decisionmaker finds it is appropriate to consult with the medical consultant.

*Comment:* One commenter was concerned with how we would evaluate the success and impact of the model procedures.

*Response:* We will have a study design and evaluation plan in place to assure a valid and accurate assessment of the degree to which the modifications to the disability determination process we test attain the goals we wish to achieve before any national implementation of the modifications begins.

*Comment:* Several commenters expressed concerns that the proposed models did not appear to make any provisions for applicants requiring special assistance—e.g., individuals with mental impairments, older persons, the homeless, etc.

*Response:* The modifications to the disability determination process we test will not compromise any provisions that we currently have to provide accommodations for those individuals who require special assistance. As we stated in the summary sections of the NPRM and final rules, all other regulations related to the disability determination procedures remain unchanged unless specified. This would include provisions for claimants who may require special assistance. In fact, the disability claim manager model we now intend to test provides even more flexibility and opportunity to assist claimants who may require special

assistance. The disability claim manager, acting as the focal point for the claimant's contacts with us throughout the initial disability process, will explain the disability programs to the claimant, including the definition of disability and how SSA determines if a claimant meets the disability requirements of the Act. The disability claim manager will also tell the claimant what he or she will be asked to do throughout the process, what the claimant may expect from SSA during the process, and how the claimant can interact with the disability claim manager to obtain more information or assistance. The disability claim manager will also advise the claimant regarding the right to representation and provide the appropriate referral sources for representation.

*Comment:* Several commenters were concerned regarding the use of videoconferencing as a substitute for personal face-to-face interviews, because videoconferencing may not carry the same weight as a face-to-face interview and the lack of personal contact could make the applicant feel depersonalized. In addition, some commenters expressed concerns that videoconferencing may not be an option for those claimants with special needs such as those with visual or hearing-related disabilities, or for those individuals who could not provide their own videoconferencing equipment.

*Response:* The testing of videoconferencing as an alternative to a personal face-to-face interview was proposed and is included in these final rules because it has the potential of becoming a viable and more convenient alternative for many claimants who would find it a hardship or impossibility to travel for an interview, but who still wanted to take advantage of the opportunity of an interview with the decisionmaker prior to the determination of disability. An interview conducted via video or via the telephone will carry the same weight as an interview conducted face-to-face. In these final rules the decisionmaker(s) who will conduct the interview has the discretion to determine which method of interview (face-to-face, videoconferencing, or telephone) is most appropriate for each claimant's special needs. If we decide to conduct a claimant's interview via videoconferencing, we will provide the necessary videoconferencing services for the claimant. We are exploring and testing the option of videoconferencing at all levels of the claims process, both within and outside the projects to be done under these regulations.