



AMERICAN CITIZENS ABROAD

EDUCATE, ADVOCATE AND INFORM

VIA EMAIL

October 29, 2021

Ms. Doris Diaz,
Assistant Associate Commissioner
Social Security Administration
Office of Earnings and International Operations
Division of Earnings and Business Services
6100 Wabash Ave, ST-01-040
Baltimore, MD 21215

Dear Ms. Diaz,

I am writing on behalf of Americans Citizens Abroad, Inc. (ACA) the largest, Washington, DC based, non-partisan, non-profit 501(c)(4) organization representing the interests and concerns of Americans living and working overseas. Alongside ACA is ACA Global Foundation (ACAGF), our sister research and educational non-profit 501(c)(3) organization. ACA has been advocating on behalf of Americans living and working overseas for over 40 years on a wide platform of issues i.e., representation, voting, citizenship, taxation, and others.

I would like to bring to your attention continued reports we are hearing from Americans overseas who are in need of US citizens services through their Federal Benefits Units (FBUs) located in various US Embassies and Consulates. ACA understands that the FBUs have been under extraordinary pressure given the COVID-19 lockdown of US Consulates and Embassies, however, we also understand that there has been a general consolidation of FBUs therefore reducing the number of FBU services available to Americans overseas.

A persistent problem, which ACA has highlighted to your offices in the past, is the procurement of US Social Security numbers (SSN). As you are aware, US citizens need Social Security numbers to file their tax returns, apply for important benefits such as the Child Tax Credit and the Earned Income Exclusion. We have had numerous reports from individuals who are unable to procure Social Security numbers due to the closure of US Embassies and Consulates, however, many simply are unable to get an answer to basic questions regarding Social Security numbers and benefits from the FBUs although US Embassies and Consulates claim that emails are being handled (most FBUs cannot be contacted via phone).

Additionally, many foreign financial institutions have begun requesting their US person clients to provide either a SSN or an Individual taxpayer identification number (ITIN), in order to maintain their relationships with foreign financial institutions. Those individuals who are US citizens, and therefore must provide a SSN, are facing long delays, some having waited nearly two years for a SSN. Without a SSN these individuals are faced with losing banking services, having accounts closed, mortgages called



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in, lines of credit denied, etc. Again, contact via email or telephone with FBUs at the various US Embassies and Consulates have gone unanswered, leaving many individuals in truly dire situations.

Many individuals are also looking for guidance as to whether the Social Security Administration will be providing “proof of life forms” for 2021. These were suspended for 2020, however, with no updates from the Social Security Administration, many individuals are concerned that if they do not receive or fill out a 2021 form they will lose their Social Security benefits. We have heard informally that these forms have been suspended for 2021 as well, however, we cannot find anywhere on the Social Security website where this is stated so that we can advise the community.

As you are probably aware, Americans overseas are unable to create a “My Social Security Account” when they are living overseas due to the requirement of having a US address and/or issues related to the verification procedures. Many of the services that these individuals could manage through the My Social Security Account portal are denied them. Individuals have written to ACA wanting to change the bank where their Social Security payments are being received or to make a simple address change but are unable to do so. Again, they are unable to contact the FBUs via phone or email to provide this information and are unable to go online to make these changes. For some individuals this is a critical issue as the bank accounts where they are currently receiving their Social Security benefits are being closed and they are unable to provide the Social Security Administration with an updated account number.

ACA has raised these problems with Congressional representatives, these are not new problems but existing problems that have been exacerbated not only by the COVID-19 pandemic but by the decision to consolidate many of FBUs which has seriously reduced the servicing of Americans overseas. These individuals are tax paying citizens and should have the same level of servicing as their domestic citizen counterparts. ACA had hoped that with the amelioration of the COVID-19 pandemic and the reopening of some of the US Embassies and Consulates, that the delay times for procurement of Social Security numbers as well as the general servicing of the community would be addressed, sadly the community reports indicate otherwise.

I would welcome the opportunity to speak with you about these issues in the hopes of providing the community with some guidance and answers. I will have my administrative manager Julie Sanford reach out to you to set up a time when we can speak together.

Kind regards,

Marylouise Serrato
Executive Director
American Citizens Abroad, Inc.