



AMERICAN CITIZENS ABROAD

EDUCATE, ADVOCATE AND INFORM

October 19, 2020

The Honorable Carl Risch
Assistant Secretary of State
U.S. Department of State
Bureau of Consular Affairs
600 19th Street, NW
Washington, DC 20036

Dear Assistant Secretary Risch,

I am writing on behalf of Americans Citizens Abroad, Inc. (ACA). ACA is a non-profit, non-partisan section 501(c)(4) advocacy organization headquartered in Washington, DC representing the concerns of American citizens living and working overseas.

ACA understands that US Embassies and Consulates worldwide have been working under unusual and difficult situations due to the COVID-19 pandemic and lockdown. With many US Embassies and Consulates still closed or with limited servicing and with reduction in staffing, US citizens services have been and continue to be seriously affected.

ACA is concerned with continuing reports regarding the serious delays to outright inability of some US citizens to access important US citizen services. Our members and supporters have reported that at some US Embassies and Consulates parents are unable to schedule or are waiting months for appointments for Consular Report of Birth Abroad (CRBA) and applications for Social Security numbers for their children. Additionally, there are still reported delays for US citizens who are first time applicants for passports and those renewing expiring passports. CRBA reports are especially critical for those who need to travel or repatriate—return to the US—and need to apply for their children's US passport. Equally important are the Social Security numbers for dependent children, which is essential for qualifying for the CARES Act Economic Impact Payments (EIP) and no doubt will be needed for future COVID-19 stimulus efforts.

As you are certainly aware, with the implementation of the Foreign Account Tax Compliance Act (FATCA) legislation, many foreign banks are requesting their US citizens clients provide US Social Security numbers. Since the implementation of the legislation, it has been reported to ACA that there have been serious delays in the procurement of Social Security numbers for first time applicants. The COVID-19 pandemic and lockdown has only made the process worse. ACA has had reports from individuals who have been told that due to the COVID-19 pandemic and lockdown it may take up to 8 to 10 months for the procurement of a Social Security number. Without this information, many banks are simply closing accounts or denying accounts to US citizens. In some cases, this leaves individuals without the means to receive salary payments or make payments for housing, utilities and basic expenses.



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Although the Treasury and the IRS has informed foreign banks that the lack of a US Social Security number should not be a determinant in closing a foreign bank account or denying US citizens banking services, the facts on the ground are that this can and is happening. The US State Department has an obligation to US citizens to ensure that applications for Social Security numbers can be timely issued, in particular for individuals who find themselves in these serious bank account “lockout” situations.

The COVID-19 pandemic has also brought to light growing problems with the US State Department’s general outreach to the overseas American community. These have been highlighted in H.R. 6595, the Expanding Vital American Citizens Services Overseas (EVACS) Act introduced by Representative Joaquin Castro and Senator Edward Markey. The Bill language calls on the US State Department to improve servicing and outreach to the overseas American community through increased staffing and adoption of remote systems to deal with the urgent need for certain services like CRBAs, Social Security numbers, passports and, in some cases, repatriation services. The US State Department encourages US citizens who travel overseas to register with STEP (Smart Travel Enrollment Program). This is an excellent initiative. However, it should be remembered that there are, per the US State Department’s own figures, nearly 9 million Americans living and working overseas. A better system of engagement between the community and the US State Department should exist. STEP provides a starting point, but we feel more can and should be done. Many US citizens report that it is difficult or impossible, even during normal circumstances, to contact the US Embassy or Consulate in their jurisdiction. Reports indicate that often emails are never answered to or lack complete follow-up, and that phone service into US Embassies, Consulates and Federal Benefits Units (FBU) is non-existent or limited to a pre-recorded message with scant information provided. With many Americans overseas living distanced from their local US Embassy or Consulate, it is imperative that these citizens have the ability to easily contact and engage with the US State Department.

Again, ACA appreciates that the US State Department, like many US government agencies during this time, is working under difficult and unusual circumstances. Many of these issues, however, pre-date the COVID-19 pandemic. It should be a priority of the US State Department to do all in its power to ensure outreach to the community and guarantee that essential US citizen services are available to the community. ACA stands ready to assist the US State Department in any way it can. As the premier organization representing Americans living and working overseas, we have a network of outreach through our membership, social media and our website that provides hundreds of thousands of US citizens overseas with information and important updates. We would be grateful for the opportunity to meet with you to discuss these issues and how ACA can further help the US State Department to better serve US citizens overseas.

Sincerely,

Marylouise Serrato
Executive Director
American Citizens Abroad, Inc.