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Commissioner  
Social Security Administration

I have reviewed the Bazelon position regarding your proposed changes to SSA criteria for disability. Added to their long list of recommendations is a request for greater DAA clarification in cases in which there is a suspected dual disorder.

I would recommend consideration of already accepted criteria regarding drug and alcohol abuse but this should be spelled out in greater detail, so that a more standard application can be applied.

This issue (12.09) is a complicated one for most mental health professionals. It is only one example why your proposed SDM policy further jeopardizes the credibility of the SSA program in the eyes of the general public. Let the professionals rate these cases. They are the ones who have actually worked with the disabled public, and have participated in graduate level classes and internships regarding treatment for these disorders.

Expanding acceptable "medical sources" is a good idea in this new age of HIPAA requirements, as less evidence becomes available. However, using such evidence in rating a claim will require professional oversight to be sure that it is consistent with psychiatric and psychological standards.

Sincerely,

A handwritten signature in black ink that reads "Alexander Fisher PhD". The signature is written in a cursive style with a large, stylized 'A' and 'F'.

Alexander Fisher PhD