

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

AMERICAN ASSOCIATION OF PEOPLE WITH  
DISABILITIES, *et al.*,

*Plaintiffs,*

v.

LELAND DUDEK, in his official capacity as  
Acting Commissioner of the Social Security  
Administration, *et al.*,

*Defendants.*

No.

**DECLARATION OF CAROLYN VILLERS**

I, Carolyn Villers, hereby declare and state as follows:

1. I am over 18 years of age and competent to make this declaration.
2. I have personal knowledge of the facts set forth in this declaration and if called as a witness, I could and would competently testify to matters stated herein.
3. I reside in [REDACTED].
4. I am the Executive Director of Massachusetts Senior Action Council (“MSAC”), and have been since 2009. I have been with the organization since 2005.
5. MSAC is a 501(c)(3) nonprofit membership organization made up primarily of seniors and people over the age of 65 living in Massachusetts. We have six regional chapters across the Commonwealth of Massachusetts.
6. MSAC is a statewide, grassroots, senior-run organization that empowers its members to collectively address key public policy and community issues that affect their health and well-being.

7. MSAC has 1,288 members across the Commonwealth. Many members have disabilities, including mobility challenges (use walkers, canes, wheelchairs, scooters), hearing or visual impairments, and many have chronic health conditions that are disabling. Many members receive services or benefits tied to their disabilities. I am aware of at least 25 people who rely on paratransit services, and approximately 100 people who receive home and community-based, long-term care services due to their disability.

8. Virtually all of MSAC members receive benefits through the Social Security Administration (“SSA”).

9. In addition, many members rely on SSA to answer benefit related questions, obtain replacement Social Security cards and to secure other related benefits, such as Medicare.

10. In furtherance of our mission, MSAC has worked to keep members informed of changes in benefits and provide some assistance to members with securing the benefits they are entitled to receive. We frequently assist members in navigating the complex web of applications and supporting documents relating to Medicaid and Medicare Savings Programs applications. Through that work, we have also encountered Social Security related challenges, but we have limited capacity to provide substantial direct assistance on Social Security issues.

11. I have regular meetings with MSAC members where we discuss emerging public benefits issues impacting membership.

12. Most recently, on March 28, 2025, I met with several members of the Boston Chapter Board. These members reported to me that they are experiencing difficulty getting in touch with SSA. They told me about the difficulty they had reaching SSA by telephone, and reported they were disconnected after being put on hold. Another reported they had trouble with the online interface and were unable to pass all the identity verifications required to set up access

to Social Security online. I also learned from members that four of them had yet to receive their 1099 form from Social Security, which they need to file their taxes before April 15.

13. Other members have reported difficulty getting through to SSA on the telephone and that they have not been able to secure in-person appointments at a Social Security office, as none were available. Members have called me in a panic when checks are late, wondering what they are going to do.

14. MSAC has been forced to divert resources from its core activities to combat this discrimination. The MSAC has no dedicated funding and limited resources to assist people with Social Security benefits issues. When our members have difficulties with SSA, they call the MSAC. As SSA makes it more difficult to access services, while offering little or no information on alternatives, the MSAC will need to expand its resources dedicated to this effort, and concomitantly reduce resources dedicated to other mission priorities. Managing SSA's frequent policy changes, training staff and appropriately advising members will become more costly and time-consuming with SSA's new structure and policies.

15. This diversion of resources detracts from MSAC's ability to advocate for other critical issues affecting its members, such as access to housing, food insecurity, transportation, and health equity.

16. Since January 2025 MSAC has had to spend time assisting members in new areas. We have a sub-grant to assist older adults with applications for health benefits, which can include some involvement with Social Security. However, since January 2025 we have been getting more and more calls for assistance or information related to Social Security. MSAC is spending more time on calls from seniors who are concerned about Social Security – some are

related to challenge's they have exp interacting with SSA, while others are from people who are scared or anxious about what's happening at SSA, fearful that their benefits will stop or be cut.

17. MSAC has nine staff members who work with members. As of the beginning of March, I have been devoting significant time with staff discussing how to respond to the challenges members are reporting related to accessing SSA, and discussing how we might be able to assist in addressing some of those problems.

18. While we haven't formally tracked Social Security related inquires, I have noticed an increase. In my almost twenty years here, it has been a rare occurrence that we'd heard of problems accessing Social Security services. However, in the past two months, we've gotten approximately twenty call or inquiries, amounting to multiple people asking talking to us about their problems with Social Security each week.

19. A lot of our members rely on SSA as their primary source of income, and they rely on it to pay for rent, groceries and all their other needs. Some rely solely on their Social Security benefits with no other income at all. Several members have shared with me their fear of losing these benefits and not being able to pay their bills or costs of housing.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/7/2025

DocuSigned by:  
  
2B09B66AF00240B...  
CAROLYN VILLERS