

## Justification of Nonmaterial Changes (83-C worksheet)

**0938-1095**

1. Change 6 month to 12 month timeframe for proof of pre-existing condition = PCIP amended its enrollment application to extend the date upon which we will except proof from an applicant demonstrating they have a pre-existing condition. We previously accepted a denial letter or offer of coverage that was dated within the past *6 months*. We have changed this to now accept documentation dated within the past *12 months*. This will not impact our current burden estimates for completing a PCIP enrollment application because we are not requiring additional proof. Instead, we are simply extending our look back period with regard to the timeframe within which documentation will be accepted.
2. Add a section that asks applicants how they heard about the program = PCIP has been asked to find ways in which it can track what outreach methods may or may not be working across the country. Accordingly, we have added a section to our enrollment application asking applicants to let us know, by marking a checkbox, how they heard about the PCIP program. This section is optional and completion of this section is not a requisite to enrollment in the program. This will not impact our current burden estimates for completing a PCIP enrollment application because the timeframe to select how one has heard about our program is a negligible amount of time, less than 10 seconds, and accordingly would not impact our current burden estimates for completion of our enrollment application.
3. Additional option an applicant under age 19 may prove a pre-existing condition = Currently, an application for a child under age 19 in the had to include evidence that the child had been offered individual insurance coverage for a premium that was at least twice as much as the premium for the Standard Option. In recognition of the absence of carriers issuing child-only policies in the individual market, we will add an additional option by which a child may now qualify for the federally-administered PCIP on the basis of having a condition that was present before the date of enrollment for such coverage, whether or not any medical advice, diagnosis, care, or treatment was recommended or received before such date, provided that he or she is a U.S. citizen or national or otherwise lawfully present in the U.S. and has been without creditable coverage for at least 6 months. This will not impact our current burden estimates for completing a PCIP enrollment application because we are not requiring additional proof but instead are providing an additional option by which someone under age 19 may prove a pre-existing condition. Additionally, the current burden estimate calculates an individual's time to comply with only one of the current three options to prove eligibility. This change will not alter that estimate but instead will simply give an applicant under the age of 19 one of four options to prove eligibility. While the changes will not be made immediately to our paper or electronic enrollment application (b/c of systemic constraints & other system release priorities) we will still begin implementing this policy by verbally making the public aware of this option.

