

Justification for Non-Substantive Changes for SSA-604
Certificate of Incapacity
CFR Citations
OMB No. 0960-0739

Background

Rules governing the Federal Employee Health Benefits (FEHB) plan require physicians to verify the disability of Federal employees' children ages 22 and over to retain health benefits under the employees' plans. The physician must verify that the adult child has a disability that meets the following criteria: (1) Pre-dates the child's 22nd birthday; (2) is very serious; and (3) expected to last at least one year. Physicians use Form SSA-604, the Certificate of Incapacity, to document and certify the disability of children ages 22 and over whose parents are SSA employees. SSA uses the information to determine adult children's (age 22 and above) eligibility for coverage under a parent's FEHB plan. The respondents are physicians of SSA employees' children ages 22 or over who are seeking to retain health benefits under their parent's FEHB coverage.

Although the CFR authority to collect the information has not changed, SSA is acting at the direction of the Office of Personnel Management (OPM) Benefits Administration Letter (Number 11 - 202) dated March 10, 2011 expanding child eligibility under FEHB as a result of the enactment of the Affordable Care Act (ACA).

Revisions to the Collection Instrument

Change any reference to age 22 to age 26 (age 22 is notated five times on the current form) on Form SSA-604.

Justification

The ACA has expanded the coverage of children under their parent's FEHB Program until age 26. Previously it was until age 22.



OPM Letter 11 - 202