

**Supporting Statement for Form SSA-604
Certificate of Incapacity
5 CFR 890.302(d)**

OMB No. 0960-0739

A. Justification

1. Introduction/Authoring Laws and Regulations

The Federal Employee Health Benefits (FEHB) Program allows dependent children of Federal employees to continue receiving health care benefits as covered family members until age 26. At age 26, children's FEHB coverage terminates. However, as stated in section 5 *CFR 890.302(d)* of the *Code of Federal Regulations*, children ages 26 and older can continue to receive health benefits under the FEHB Program if they are incapable of self-support due to a disability.

FEHB rules require a physician to verify the disability of Federal employees' children ages 26 and over to retain health benefits under the employees' plans. The physician must verify the adult child has a disability that meets the following criteria: (1) pre-dates the child's 26th birthday; (2) is very serious; and (3) is expected to last at least one year. The Social Security Administration (SSA) uses the information to determine adult children's (age 26 and above) eligibility for coverage under a parent's FEHB plan.

2. Description of Collection

Physicians use Form SSA-604, the Certificate of Incapacity, to document and certify the disability of children ages 26 and over whose parents are SSA employees. SSA uses the information to determine adult children's (age 26 and above) eligibility for coverage under a parent's FEHB plan. The respondents are physicians of SSA employees' children ages 26 or over who are seeking to retain health benefits under their parent's FEHB coverage.

3. Use of Information Technology to Collect the Information

Form SSA-604 is available as a print-only PDF on SSA's website. SSA did not create an electronic version of Form SSA-604 under the agency's Government Paperwork Elimination Act plan because only 50 respondents complete the form annually.

4. Why We Cannot Use Duplicate Information

The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use another collection instrument to obtain similar data.

5. Minimizing Burden on Small Respondents

This collection does not affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If SSA did not collect the information, SSA employees with children ages 26 and over who qualify for the FEHB program because of their disabilities would have no means of applying to retain their health coverage. Because the physicians only complete the form once, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

7. Special Circumstances

There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 *CFR* 1320.5.

8. Solicitation of Public Comment and Other Consultations with the Public

SSA published the 60-day advance Federal Register Notice published on January 8, 2013, at 78 FR 1296, and we received no public comments. SSA published the second Notice on March 20, 2013, at 78 FR 17276. If we receive any comments in response to our second Notice, we will forward them to OMB. There have been no outside consultations with members of the public.

9. Payment or Gifts to Respondents

SSA does not provide payments or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects in accordance with 42 *U.S.C.* 1306, 20 *CFR* 401 and 402, 5 *U.S.C.* 552 (*Freedom of Information Act*), 5 *U.S.C.* 552a (*Privacy Act of 1974*), and OMB Circular No. A-130.

11. Justification for Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Approximately 50 physicians take 45 minutes each to complete Form SSA-604 each year, resulting in a burden of 38 hours. This figure represents burden hours, and we did not calculate separate cost burden.

13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$2,789. This cost is an estimate of the fees paid to SSA physicians for reviewing the form.

15. Program Changes or Adjustments to the Information Collection Request

There are not changes to the public reporting burden.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

18. Exceptions to Certification Statement

SSA is not requesting an exception to the certification requirements at 5 *CFR* 1320.9 and related provisions at 5 *CFR* 1320.8(b)(3).

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.