



Tribal Benefits Administration Letter

Number: 15-602

Date: November 5, 2015

**Subject: Federal Employees Health Benefits (FEHB) Program for Tribal
Employees: Self Plus One Operational Issues**

I. Background

The U.S. Office of Personnel Management issued a final rule on September 17, 2015 to amend the Federal Employees Health Benefits (FEHB) Program regulations to include the new Self Plus One enrollment type. The final rule amends FEHB regulations to comply with provisions of the 2013 Bipartisan Budget Act.

II. Purpose

This Tribal Benefits Administration Letter (TBAL) highlights several operational details impacted by the final rule, including:

- Children's Equity and Changes to Self Plus One;
- Switching a Covered Family Member; and
- Qualifying Life Events (QLEs) That Occur After Open Season 2015 and Prior to January 1, 2016.

III. Children's Equity and Changes to Self Plus One

The FEHB rules concerning children's equity when a court order is involved are the same for a Self Plus One enrollment as they are for a Self Only or a Self and Family enrollment. This means that tribal employees subject to a court or administrative order to provide health benefits for their child(ren), must cover their child(ren) under a Self Plus One or Self and Family enrollment. As a result, we have modified the procedure for processing health benefits enrollments in children's equity cases with a court order in order to address the Self Plus One enrollment type.

This modification creates new procedures for the Tribal Benefits Officer (TBO). TBOs are responsible for ensuring that the child under the court order is the designated eligible family member under the Self Plus One enrollment prior to entering the decrease from Self and Family to Self Plus One into TIPS.

IV. Switching a Covered Family Member

Under a Self Plus One enrollment, a tribal employee may “switch” the designated family member based on certain QLEs experienced outside of Open Season. Switching a family member means that the enrollment type remains Self Plus One, but the designated family member changes. Effective dates for switching a covered family member will be prospective. Tribal Benefits Administration Letter 15-601 (Self Plus One Final Rule Published) also discussed opportunities for switching a covered family member.

However, a tribal employee may not switch the designated family member if the QLE experienced is not consistent with that change. Please see the examples below:

1. Situation when the enrollee may switch a covered family member

An enrollee has a spouse and one eligible child. The enrollee’s spouse has coverage through his employer, so the enrollee enrolls in a Self Plus One enrollment and designates the eligible child as the covered family member. When the covered child turns age 26 and is no longer eligible to be covered under an FEHB enrollment as an eligible family member, the enrollee has the following options:

- a. The enrollee may remain in the Self Plus One enrollment and choose to switch the spouse for the child (who is no longer eligible) during the 31 days before until the 60 days following the QLE. In this circumstance, code 1C would be the applicable QLE code on the SF 2809 (for those participating in premium conversion) and would include the name of the newly designated eligible family member (the spouse). When the carrier receives this information, the carrier may request documentation to prove the eligibility of the newly designated family member, just as it currently does when a new family member is added to a Self and Family enrollment.
- b. The enrollee may choose to decrease the enrollment to Self Only during the 31 days before until the 60 days following the QLE. In this circumstance, code 1C would be the applicable QLE code on the SF 2809 as well.

It is important to emphasize that the window to report a QLE in all these situations is during the 31 days before until the 60 days following the QLE. If the enrollee does not report the QLE during this time period, he/she will need to wait until the next Open Season, or until another QLE occurs, to make the change. Retroactive switching of a covered family member is not allowed.

2. Situation when the enrollee may NOT switch a covered family member

An enrollee has a Self Plus One enrollment and covers her spouse. The enrollee then adopts a child. This QLE is consistent with increasing enrollment to Self and Family but not with switching the covered family member from the spouse to the newly eligible child.

V. QLEs That Occur After the 2015 Open Season and Prior to January 1, 2016

Self Plus One enrollments will not be available for any coverage effective dates prior to January 1, 2016. If an enrollee experiences a QLE that necessitates a decrease or increase in coverage to Self Plus One after the 2015 Open Season (which ends on December 14, 2015) and prior to January 1, 2016, and the first day of the next pay period is prior to January 1, 2016, the Self Plus One enrollment option will not be available during that pay period. For instance:

- For an enrollee on a bi-weekly pay cycle, the pay period following the 2015 Open Season runs from December 13-26, 2015. A change to Self Plus One cannot become effective on the first day of the next pay period because December 27, 2015 is prior to January 1, 2016.
- For an enrollee on a monthly pay cycle, the pay period following the 2015 Open Season begins on January 1, 2016. A change to Self Plus One can become effective on the first day of this pay period because it is after December 31, 2015.

TBOs cannot process an enrollment change to Self Plus One for tribal employees whose coverage effective dates are prior to January 1, 2016. Instead, these enrollees should be counseled to select a Self and Family enrollment due to the QLE and then decrease the enrollment to Self Plus One during the Limited Enrollment Period, which will run from February 1-29, 2016. Only decreases in enrollment type from Self and Family to Self Plus One will be allowed during the Limited Enrollment Period. For employees whose coverage effective date falls on or after January 1, 2016, TBOs should process enrollment changes to Self Plus One.

VI. Additional Information

For additional information about the Self Plus One enrollment type, please visit www.opm.gov/selfplusone. In addition, the following Tribal Benefits Administration Letters are available on our website at www.opm.gov/healthcare-insurance/tribal-employers/hr-personnel/#url=BALs:

- 14-602: Self Plus One Enrollment; and
- 15-601: Self Plus One Final Rule Published;
- Forthcoming: Standard Form 2809 and Standard Form 2810.

If you have additional questions, please contact the Self Plus One inbox at selfplusone@opm.gov.

Sincerely,

John O'Brien
Director
Healthcare and Insurance