FEHB Program Carrier Letter All Carriers

U.S. Office of Personnel Management Insurance Services Program

Letter No. 2003-33 Date: November 3, 2003

Fee-for-service [32] Experience-rated HMO [32] Community-rated HMO [30]

SUBJECT: HIPAA compliant enrollment transactions

In Carrier Letter 2002-37, OPM informed you that we are in the process of making our electronic enrollment transactions HIPAA compliant. As a part of that process, in February 2002, OPM established an OPM/Carrier workgroup to convert the current file formats for health benefits enrollment actions to the HIPAA standard (ASC X12N 834 - Benefit Enrollment and Maintenance, Version 4010).

OPM/Carrier Workgroup

Originally, the workgroup intended to convert enrollment actions made by enrollees electronically through Employee Express and the OPM-Macon Data-Hub to the HIPAA standard. However, it soon came to the workgroup's attention that both the National Finance Center (NFC) and OPM's Retirement Services Program (RSP) send SF 2809 (Health Benefits Election) and SF 2810 (Notice of Change in Health Benefits) enrollment actions electronically (via tapes or cartridges) to certain FEHB Program carriers. Both NFC and RSP will now send HIPAA-compliant SF 2809 enrollment actions electronically to all carriers through the Macon Data-Hub. However, some actions will continue to be sent in paper for now.

The workgroup concentrated on four types of transactions:

- (1) Standard Form (SF) 2809 actions processed electronically through Employee Express and the OPM-Macon Data-Hub;
- (2) Electronic FEHB Clearinghouse (CLER) corrective action 2908s sent to carriers through the Macon Data-Hub;
- (3) Electronic CLER corrective action 2810s sent to carriers through the Macon Data-Hub; and
- (4) SF 2810 transactions processed electronically through the OPM-Macon Data-Hub.

OPM anticipated generating 2809 enrollment transactions in the HIPAA compliant format by October 16, 2002. However, OPM and OPM's Technology Support Center (OPM-Macon) requested one year extensions under the Administration Simplification Compliance Act. The workgroup has now completed gap analysis and mapping for the Employee Express and Data-Hub 2809 transactions. OPM-Macon is now sending HIPAA compliant SF 2809 transactions.

Companion Guide

Enclosed with this carrier letter is a copy of the FEHB Program Companion Guide. This Guide clarifies and specifies the data content transmitted electronically from OPM-Macon for SF 2809 enrollment and disenrollment actions. The coding and values in the Companion Guide are the result of compromises between the various methods Federal agencies use to store and transmit enrollment data and the processes the FEHB plans established to use the enrollment data. The workgroup strived to adopt transaction coding that would accommodate all of the FEHB carriers. OPM does not have the resources to modify transmission coding to specifically conform to the wishes of every carrier in the FEHB Program. Therefore, the coding and values used in the Companion Guide cannot change.

Testing

OPM-Macon has begun preliminary testing of the 2809 transactions with a small group of carriers. The results have been encouraging. Our testing procedures are as follows.

Three different test files will be created by OPM-Macon and provided to FEHB plans to test their enrollment processing systems.

Test file #1 - "SYNTAX" check file to test translator syntax

Test file #2 - All "Add" transactions

Test file #3 - "Add", "Delete", "Update" transactions

To test the complete cycle of members, test file #2 will contain all "add" transactions. Test file #3 will contain "delete" and "update" transactions for those members on test file #2 as well as adding new enrollees in some "add" transactions.

OPM-Macon will provide a detailed Test Plan document for each test file so that FEHB plans will know what scenarios are being covered in each transaction.

All test files will be encrypted and placed on the current FEHB Data-Hub FTP server in each plan's "HIPAA" directory. Directory paths and test file names will be given in the Test Plan documents. Files can be decrypted by the same personnel who currently decrypt and process all files provided to FEHB plans through the FEHB Data-Hub.

All FEHB plans will receive the same test data with the plan's appropriate FEHB enrollment codes. FEHB plans should modify test data to accommodate their systems if necessary. For example, test files will contain domestic addresses from many different states. OPM-Macon cannot create specific records for members in the plan's servicing locations. Therefore, for example, if a plan in Georgia requires that all members on the test file have Georgia addresses, the plan should modify the addresses in the test file before processing the test file.

Future Companion Guides

We continue work on Companion Guides for CLER Corrective Action 2809s and SF/CLER

Corrective Action 2810s. We hope to issue these Guides soon.

2810 Actions

For now OPM-Macon will only send electronic SF 2810s to those carriers currently receiving them electronically from NFC. We are currently working on an electronic version of the SF 2810 for all Federal agencies to use. We will keep you informed on the progress of the electronic SF 2810 and when we will begin sending them.

If you have any questions regarding the FEHB Program and Employee Express, please contact Eric Figg at OPM at 202/606-4083 or via email at edfigg@opm.gov. For information on HIPAA X12N 834 formatting, contact Jay Fritz at OPM at 202-606-0004 or via email at jdfritz@opm.gov.

Sincerely,

- Teanh Teter

Frank D. Titus Assistant Director

for Insurance Services Program

Attachment