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# FEHB Program Carrier Letter

## All FEHB Carriers

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U.S. Office of Personnel Management  
Healthcare and Insurance

**Letter No. 2015-13**

**Date: July 9, 2015**

Fee-for-Service [10]    Experience-rated HMO [10]    Community-rated [11]

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### **SUBJECT: Reporting under IRC section 6055 for Federal Employees Health Benefits (FEHB) Program Carriers**

#### **Background**

This Carrier Letter provides additional information on the Affordable Care Act (ACA) reporting requirements for Federal Employees Health Benefits (FEHB) insurance carriers. The ACA added section 6055 to the Internal Revenue Code (IRC), which provides that carriers (as defined in 5 U.S.C. §8901) are required to file an information return with the Internal Revenue Service (IRS) on each enrollee and furnish a statement to these individuals. To show compliance with IRC section 6055, health insurance carriers must complete Form 1095-B, which requires information on the covered individual and their dependents.

#### **1095-B Requirements**

Applicable IRS regulations (available at <http://www.gpo.gov/fdsys/pkg/FR-2014-03-10/pdf/2014-05051.pdf>) make a distinction between employer-sponsored insured coverage and self-insured coverage for reporting purposes. OPM has determined, and has advised agencies and payroll offices that all FEHB plans are considered fully insured for purposes of IRC section 6055. OPM is requiring plans to comply with this requirement to ensure the Federal government properly reports information concerning covered employees to the IRS. FEHB carriers must file and furnish Form 1095-B statements for all enrollees and their covered dependents. On the Form 1095-B, FEHB carriers must also complete the fields under Part II for employer sponsored coverage.

#### **IRC 6055 Reporting**

The IRC Section 6055 requires insurance carriers to include the Employer Name, Address and Employer Identification Number (EIN) when reporting to the IRS. OPM understands that carriers do not have the EINs for enrollee employers. Carriers currently only have the Payroll Office Number (PON) from the SF-2809/2810 forms data. The carriers must be able to determine the EIN in order to meet the reporting requirements, which will be the mechanism used to determine which employee works for what agency. OPM has been working closely with a carrier work group to develop and implement solutions so carriers have the EIN data they need to report for the 2015 plan year and fulfill IRC 6055 reporting requirements.

### Crosswalk and Data Transfer Solutions for Plan Year 2015

To assist carriers in obtaining EINs, OPM is creating a crosswalk and a data transfer as outlined below.

- Crosswalk – Where there is a single PON and a single EIN, OPM will provide information for each FEHB Carrier that shows the PON linked to the EIN data (employer name, address and EIN). It is a simple crosswalk. Example:

<b>Employer Name</b>	<b>EIN</b>	<b>Address 1</b>	<b>Address 2</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	<b>PON Which Appears on the SF-2809/2810</b>
Federal Agency A	XX-XXXXXXX	1234 ABC Parkway		Eagan	MN	55555-5555	12345678

- Data Transfer – In some situations, a Shared Service Center (SSC) may have a single PON but service multiple employers with single EINs. In that instance, the carrier cannot use the simple crosswalk above. Therefore, OPM is working with the SSCs to develop a data transfer that will allow the carriers to receive EINs in order to determine the enrollee’s employer. NOTE: The data transfer is only for situations where there is a single PON linked to multiple EINs.

OPM is continuing to explore additional solutions needed to fulfill 6055 reporting requirements and will keep you advised.

Sincerely,

John O’Brien  
Director  
Healthcare and Insurance