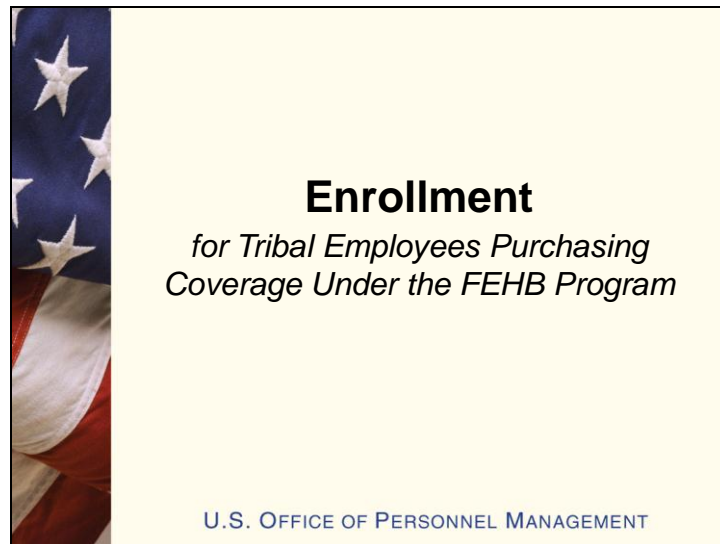


Slide 1



Slide 2

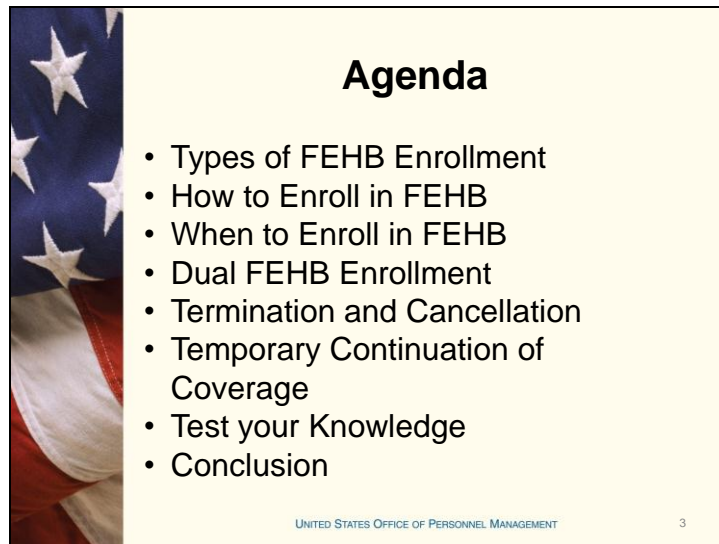


This training module was developed and approved by the United States Office of Personnel Management (OPM), the Federal agency that administers the Federal Employees Health Benefits (FEHB) Program. The information in this module was last updated January 2012. This training module is not a legal document. The official FEHB Program provisions are contained in the relevant laws, regulations, and policies that govern it.

This module serves as an introduction for Tribal Benefits Officers regarding tribal employee eligibility requirements for purchasing coverage under the FEHB Program. The module explains employee eligibility, family member eligibility, and the responsibilities of the tribal employer to properly determine and document eligibility.

OPM uses the term “tribal employer” to refer to Indian tribes, tribal organizations, and urban Indian organizations. Tribal employers carrying out programs under the Indian Self-Determination and Education Assistance Act and urban Indian organizations carrying out programs under title V of the Indian Health Care Improvement Act are entitled to purchase coverage, rights, and benefits of the FEHB Program for their tribal employees.

To check for updates on FEHB for tribal employees, go to [www.opm.gov/tribalprograms](http://www.opm.gov/tribalprograms).

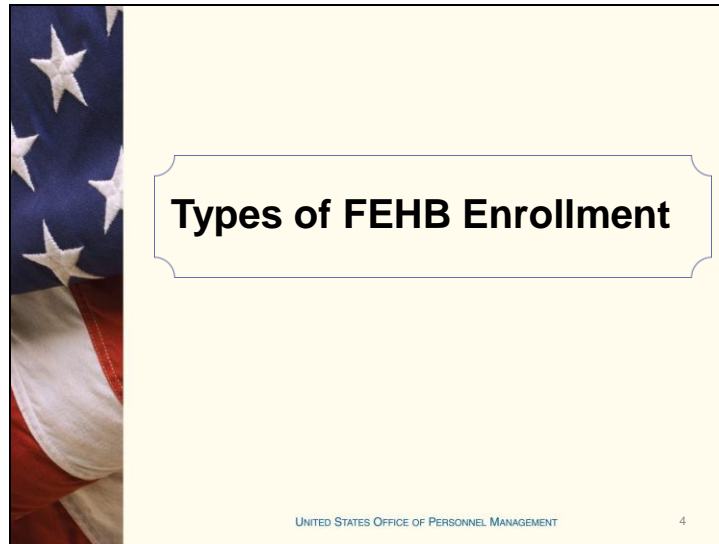


In this module, we will discuss all the aspects of FEHB enrollment for a tribal employee, including:

	<u>Slide #</u>
• What types of FEHB enrollment are available?	4
• How does a tribal employee enroll in an FEHB plan?	6
• When can a tribal employee enroll in an FEHB plan?	8
• Change in FEHB enrollment	19
• Dual FEHB enrollments are prohibited	22
• How does FEHB coverage end?	26
• Temporary Continuation of Coverage	33

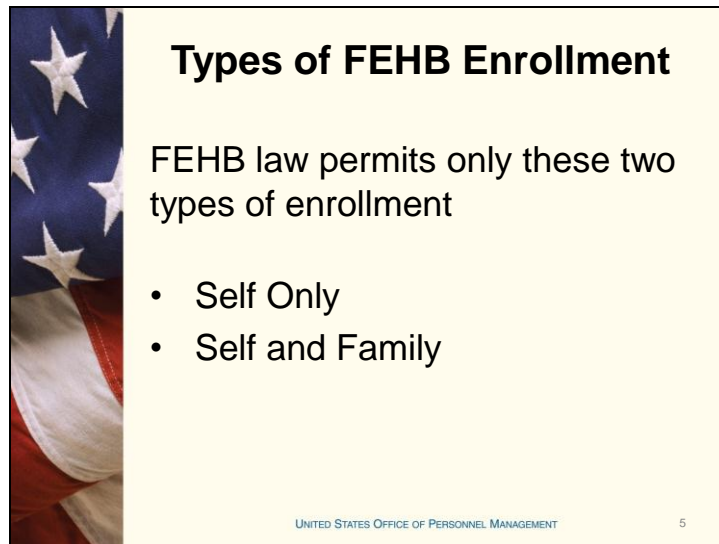
*Note:* We have included a Test your Knowledge section at the end of this module.

Slide 4



**Types of FEHB Enrollment**

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## Types of FEHB Enrollment

FEHB law permits only these two types of enrollment

- Self Only
- Self and Family

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FEHB statute [5 U.S.C. 8905(a)] only allows two types of enrollment: Self Only or Self and Family.

A Self Only enrollment provides benefits for the tribal employee only.

A tribal employee may enroll for Self Only even though the tribal employee may have a family. Under a Self Only FEHB enrollment, the employee's family is not eligible for FEHB coverage.

A Self and Family enrollment provides benefits for the tribal employee and his/her eligible family members. For more information on family member eligibility, please see the module on FEHB Eligibility, and the *Tribal FEHB Handbook* Chapter 4 on Eligibility for Health Benefits.

All eligible family members are automatically covered under a Self and Family Enrollment, even if the tribal employee does not list them on the Health Benefits Election Form (Standard Form (SF) 2809). The tribal employee cannot exclude or remove any eligible family member.

The tribal employee's FEHB enrollment will not cover anyone who is not an eligible family member, even if that person is listed on the SF 2809.

The premium for a Self and Family enrollment is the same regardless of the number of eligible family members.


Slide 6



**How to Enroll in FEHB**

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## How Does a Tribal Employee Enroll in an FEHB Plan?

- A tribal employee enrolls in an FEHB plan by completing a Health Benefits Election Form, Standard Form (SF) 2809
- The tribal employee must submit the form to his/her tribal employer

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Tribal employees must use the SF 2809 to enroll in the FEHB Program. The tribal employee must complete the form, sign it, and submit it to the tribal employer. The tribal employer then enters the information into the Tribal Insurance Processing System (TIPS). A copy of an SF 2809 can be found online at [www.opm.gov/forms/pdf\\_fill/sf2809.pdf](http://www.opm.gov/forms/pdf_fill/sf2809.pdf).

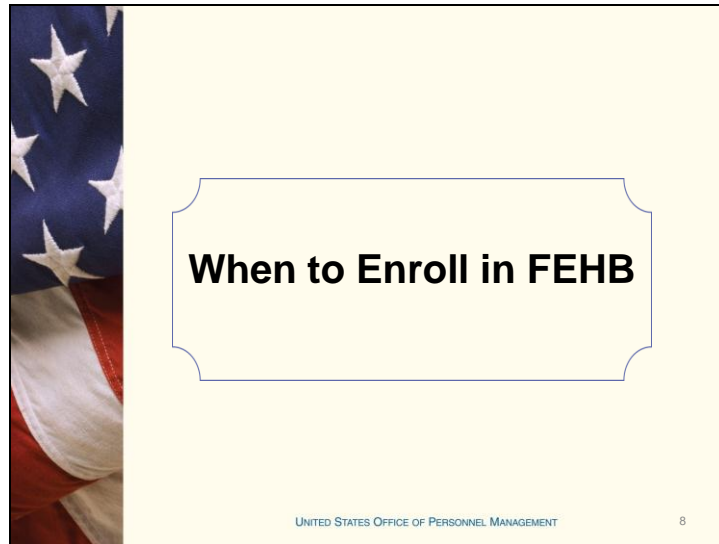
The SF 2809 is also used for employees to elect NOT to enroll. A tribal employee elects not to enroll by completing Part E of SF 2809. The tribal employee may disregard the section at the top right column of the instructions on page 3.

An election NOT to enroll is important so that the tribal employer will have documentation of the tribal employee's intentions. If a tribal employee fails to complete SF 2809 to either enroll or not enroll in an FEHB plan, the tribal employer must assume that he/she has declined to enroll

Tribal employees also use the SF 2809 to change their enrollment from one plan or option or type of enrollment to another or to cancel their FEHB enrollment.

For more information on how to fill out the SF 2809, please see SF 2809 Guidance for Tribal Employees and SF 2809 Guidance for Tribal Employers.

Slide 8



**When to Enroll in FEHB**

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**When a Tribal Employee Can Enroll in an FEHB Plan**

- Initial Enrollment Opportunity
- New or Newly Eligible
- Open Season
- Qualifying Life Event

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Generally, the Initial Enrollment Opportunity starts when the tribal employer begins participation in the FEHB Program and offers FEHB to its eligible tribal employees. The Initial Enrollment Opportunity ends the day before the first day FEHB coverage is effective.

New tribal employees have an opportunity to join the FEHB Program within 60 days of beginning employment with a tribal employer that already participates in the FEHB Program. Newly eligible tribal employees can enroll in the FEHB Program within 60 days of becoming eligible.

Current tribal employees who did not enroll at an earlier opportunity can enroll during the annual Open Season. Open Season runs from Monday of the second full work week in November through the Monday of the second full work week in December.

Certain Qualifying Life Events (QLEs) permit an employee to enroll in a plan in the FEHB Program if they are not already enrolled.

We will discuss each of these opportunities in the slides that follow.



## **Initial Enrollment Opportunity**

- The Initial Enrollment Opportunity is when the tribal employer begins participating in the FEHB Program and offers FEHB to its eligible tribal employees
- The tribal employee must elect to either:
  - Enroll in the FEHB Program, or
  - Not enroll in the FEHB Program
- The tribal employee must make this election before the effective date of FEHB coverage for the tribal employer's tribal employees.

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Again, if a tribe employee does not make an election by the required date, the tribe employer will assume that he/she does not want to participate in the FEHB Program.



### **New or Newly Eligible Tribal Employees**

- Once the tribal employer begins participating in FEHB, a new tribal employee must make an election on SF 2809 within 60 days of beginning employment
- A tribal employee who was previously ineligible for FEHB must make an election on SF 2809 within 60 days of becoming eligible for FEHB

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If a tribal employee begins employment after the tribal employer's Initial Enrollment Opportunity, he/she must elect to enroll or not to enroll in the FEHB Program so that the tribal employer will have documentation of the decision.

If a tribal employee who was previously not eligible to enroll in the FEHB Program becomes eligible, he/she must also elect to enroll or not to enroll so that the tribal employer will have documentation of the decision.

A tribal employee who does not make an election within the 60-day timeframe is considered to have declined coverage and must wait until the annual Open Season or a Qualifying Life Event (QLE) to enroll.



## Annual Open Season

- Open Season is the time when eligible tribal employees can enroll, change, or cancel their FEHB coverage
- Open Season begins on Monday of the second full work week in November and ends on the Monday of the second full work week in December
- An FEHB Open Season enrollment is effective on January 1, provided the tribal employee is in pay status

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Pay status includes any period of time for which a tribal employee receives pay for time worked, including compensatory time off, or for time on paid leave. Paid leave time includes sick leave, extended sick leave, vacations, administrative leave with pay, holidays, or military leave with pay.

If the tribal employee enrolls in FEHB during the annual Open Season, and is on nonpay status (e.g., leave without pay), the new enrollment cannot take effect until the first day of the pay period following one in which the tribal employee is in a pay status.

For example, tribal employee X is on leave without pay from October 25, 2011 until March 7, 2012. He submits an SF 2809 to enroll during the Open Season. On March 8, 2012, he returns to work and his pay resumes. The new FEHB enrollment cannot take effect until the first day of the pay period following March 8.

For more information on nonpay status, the *Tribal FEHB Handbook* Chapter 6 on Leave Without Pay Status and Insufficient Pay.




### Annual Open Season (contd)

- Tribal employees who did not enroll at an earlier opportunity may enroll during the annual Open Season

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If a tribal employee did not enroll during the Initial Enrollment Opportunity, within 60 days of beginning employment, or 60 days of experiencing a Qualifying Life Event (see next slide), he/she has another opportunity to enroll in FEHB during the annual Open Season.



## Qualifying Life Events

- A Qualifying Life Event (QLE) means an event that may permit a tribal employee to enroll, change, or cancel his/her FEHB enrollment. The change must be consistent with the event.
- The SF 2809 includes Tables of Permissible Changes in FEHB Enrollment


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The qualifying life events are based on FEHB regulations at title 5, Code of Federal Regulations, section 890.301 and Part 892.

The QLE determines which action(s) may be taken:

- Enroll in a plan in the FEHB Program, if not already enrolled
- Change type of enrollment (Self Only vs. Self and Family)
- Cancel FEHB enrollment
- Change from one plan or option to another



## Qualifying Life Events (contd)

Examples of QLEs:

- Change in family status that results in increase or decrease in number of eligible family members
- Change in employment status that could result in entitlement to coverage or affect cost of insurance
- Loss of other group health insurance coverage

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For detailed information on all QLEs, please see the *Tribal FEHB Handbook* Chapter 5, Enrollment. Here are some examples:

Change in family status -


- Marriage or divorce
- Birth or adoption of a child
- Last eligible child attains age 26

Change in tribal employee's employment status includes:

- Reemployment after a break in service of more than three days
- Return to pay status from nonpay status, if coverage terminated

Loss of other group health insurance coverage includes:

- Loss of coverage under Medicaid or similar State-sponsored program of medical assistance for the needy
- Loss of coverage under a non-Federal health plan, including foreign, State or local government, or a private sector employer



## Qualifying Life Events Tables

- Tribal employees can use pre-tax dollars to pay their share of the premium IF their tribal employer offers FEHB through a premium conversion plan to its tribal employees (in accordance with Internal Revenue Service rules)
- The correct table of permissible events on SF 2809 depends upon whether the tribal employee participates in premium conversion

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Premium conversion is a tax benefit. It allows employees to allot a portion of their pay to their employer, who in turn uses that amount to pay the employee's contribution for health coverage. The allotment reduces an employee's taxable income, so less tax is withheld from salary.

If a tribal employer chooses to participate in premium conversion, the tribal employer can decide whether tribal employee participation in premium conversion is automatic or voluntary.


The tribal employee can locate his/her QLEs by referring to the appropriate table of permissible changes on the SF 2809 ([http://www.opm.gov/forms/pdf\\_fill/sf2809.pdf](http://www.opm.gov/forms/pdf_fill/sf2809.pdf)).

- Tribal employees who participate in premium conversion must use Table 1 (Table of Permissible Changes in FEHB Enrollment and Premium Conversion Election).
- Tribal employees who do not participate in premium conversion must use Table 5 (Employees Who are Not Participating in Premium Conversion).

Tribal employees must not use Tables 2 or 3.

Table 4 is for former tribal employees and former eligible family members who enroll for Temporary Continuation of Coverage (TCC). See the Temporary Continuation of Coverage section of this module for additional information and the *Tribal FEHB Handbook* Chapter 8 on Temporary Continuation of Coverage.






## **Qualifying Life Events Tables (contd)**

- Tribal employees must use
  - Table 1 if they participate in premium conversion
  - Table 5 if they do not participate

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### Effective Date of New FEHB Enrollment

- A new FEHB enrollment is effective on the first day of the first pay period that begins after the tribal employer receives SF 2809 and the tribal employee is in pay status
- This effective date applies to FEHB enrollments of new or newly eligible employees, and enrollments based on QLEs

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Outside of the Initial Enrollment Opportunity, the effective date of a new FEHB enrollment is:

The first day of the first pay period that begins after a tribal employee's FEHB enrollment request is received by the tribal employer, and that follows a pay period during any part of which a tribal employee was in pay status.

For example, an employee's FEHB enrollment request is received on February 15th. The pay period in which the employee is in pay status ends on February 25th. The employee's coverage begins on February 26th.

*Exception:* A new enrollment based on the birth or acquisition of an eligible child is effective on the first day of the pay period in which the child is born or becomes an eligible family member. **This is the only new enrollment that does not have a pay status requirement before it becomes effective. It is also the only one that is retroactive.**

If a tribal employee who is on leave without pay (i.e., nonpay status) experiences a QLE and submits an SF 2809 within the required timeframe, the enrollment cannot go into effect until the first day of the pay period following a pay period in which the tribal employee is in pay status for at least part of that pay period.



## Changes in FEHB Enrollment

- To change enrollment means to elect a different plan or option or different type of coverage, either Self Only or Self and Family, by submitting an SF 2809 to the tribal employer.
- Tribal employees can change their FEHB enrollment when they experience a Qualifying Life Event or during the annual Open Season

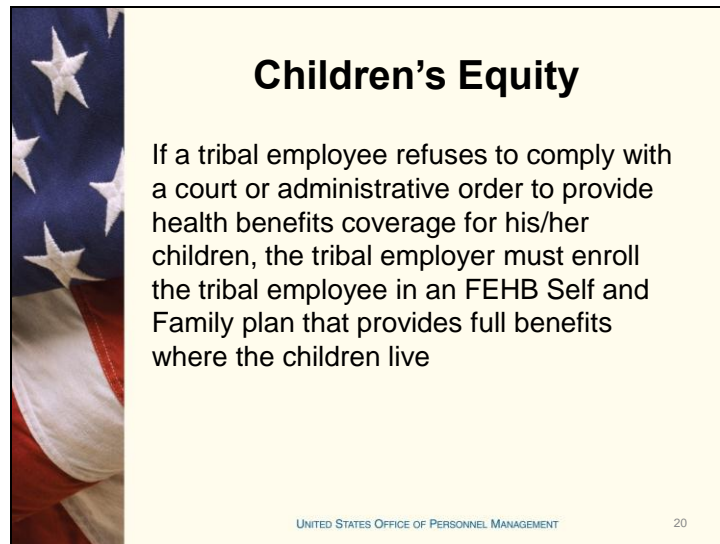
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The tribal employee can locate his/her QLEs by referring to the appropriate table of permissible changes on the SF 2809 ([http://www.opm.gov/forms/pdf\\_fill/sf2809.pdf](http://www.opm.gov/forms/pdf_fill/sf2809.pdf)).

Employees who participate in premium conversion must use Table 1 (Table of Permissible Changes in FEHB Enrollment and Premium Conversion Election).

Employees who do not participate in premium conversion must use Table 5 (Employees Who are Not Participating in Premium Conversion).

The tribal employee can also change enrollment during the annual Open Season.



**Children's Equity**


If a tribal employee refuses to comply with a court or administrative order to provide health benefits coverage for his/her children, the tribal employer must enroll the tribal employee in an FEHB Self and Family plan that provides full benefits where the children live

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This is a mandatory enrollment by the tribal employer if the tribal employee refuses to comply with a court or administrative order or provide evidence of coverage for his/her children that would satisfy the order.

It is the only time that a tribal employer can enroll the tribal employee in FEHB or change his/her FEHB enrollment to a Self and Family plan that provides full benefits where the tribal employee's children live.

For more detailed information on Children's Equity, see the Tribe FEHB Handbook, Chapter 10, Family Members. Also see the slides on Children's Equity in the Eligibility training module.



### Effective Date of FEHB Enrollment Change

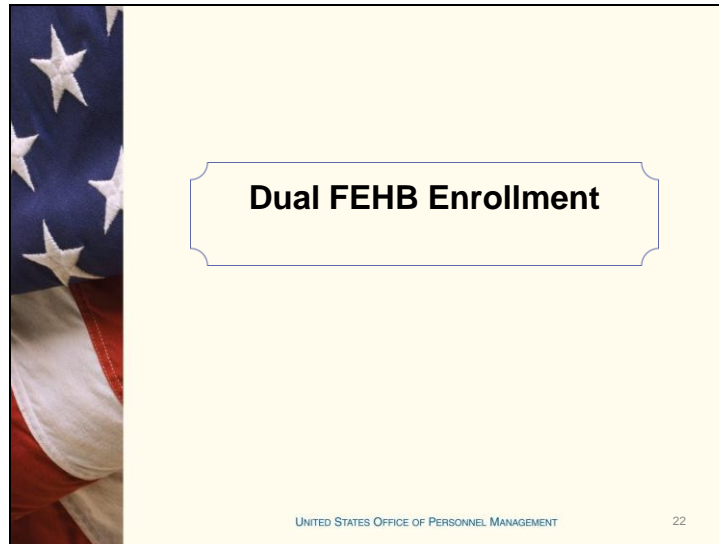
- **QLE:** FEHB enrollment change is effective on the first day of the pay period after the tribal employer receives tribal employee's SF 2809 and that follows a pay period during any part of which the tribal employee is in a pay status.
- **Open Season:** FEHB enrollment change is effective on January 1st (regardless of pay status).

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Pay status includes any period of time for which a tribal employee receives pay for time worked, including compensatory time off, or for time on paid leave. Paid leave time includes sick leave, extended sick leave, vacations, administrative leave with pay, holidays, or military leave with pay.


A tribal employee does not have to be in a pay status for an Open Season enrollment **change** to take effect. In contrast, generally, a new enrollment does require the tribal employee to be in pay status.

Slide 22



**Dual FEHB Enrollment**

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### **Dual FEHB Enrollments are Prohibited**

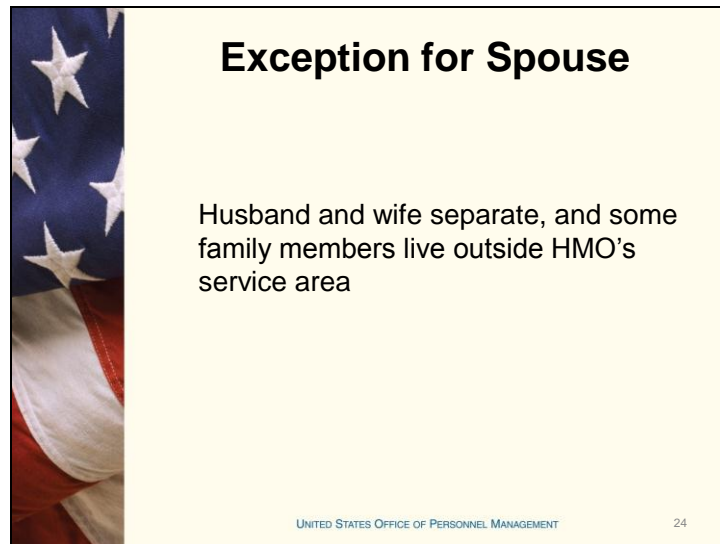
- A dual FEHB enrollment exists when a tribal employee is enrolled in or covered under more than one FEHB plan
- No tribal employee or eligible family member may enroll or be covered as a family member if he/she is covered under another person's Self and Family FEHB enrollment

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FEHB law [5 U.S.C. 8905(e)] prohibits a person from being covered under more than one FEHB enrollment. This includes FEHB enrollment via another tribal employer or a Federal government agency.

If this occurs, one of the enrollments must be voided or cancelled. There are very few exceptions to this prohibition. Dual enrollment must be authorized by the tribal employer and will only be allowed when a tribal employee or an eligible family member would otherwise lose coverage.

Some examples of allowable dual enrollment will be covered on the next two slides.



**Exception for Spouse**

Husband and wife separate, and some family members live outside HMO's service area

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A tribal employee is enrolled in an HMO and his/her spouse (who is also a Federal or tribal employee) legally separate.


If the tribal employee or spouse and/or children of the tribal employee moves outside of the HMO service area and the tribal employee does not want to change FEHB plans, the spouse and/or children would lose full health benefits coverage. In this case, a dual FEHB enrollment is allowed.

A tribal employee must inform both carriers involved which family members will be covered and receive benefits under which enrollment.

*Note 1:* If the tribal employee is enrolled in an FEHB fee-for-service plan, which provides coverage everywhere, a dual enrollment is **not** allowed.

*Note 2:* The spouse of a tribal employee is an eligible family member until the date of final divorce.





## Exceptions for Children

- Child under age 26 who is a tribal or Federal employee becomes a parent
- Child under age 26 who is a tribal or Federal employee lives outside parent's HMO's service area

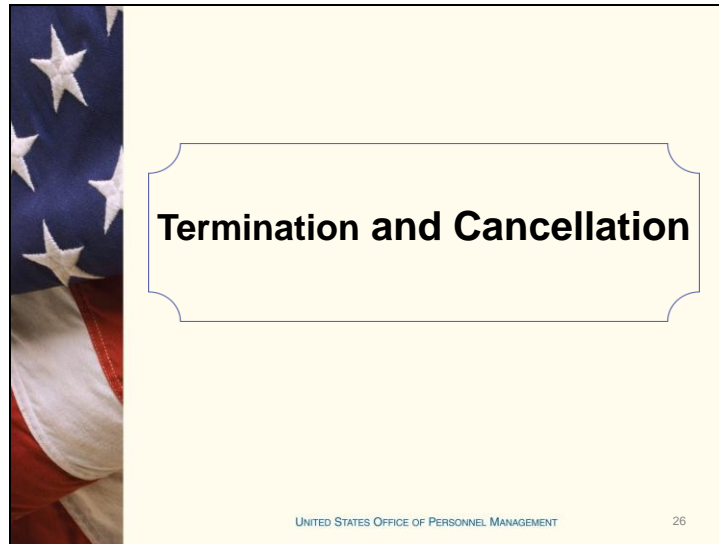
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Tribal employee has a child under age 26 who is also a tribal or Federal employee. The child needs his/her own FEHB enrollment to cover his/her children (because grandchildren are normally not eligible family members).

*Note:* a tribal employee's child under age 26 who is a tribal or Federal employee may need his/her own FEHB enrollment if he/she is married and needs to cover his/her spouse.


Tribal or Federal employee under age 26 is covered by parent's FEHB enrollment but lives outside the enrollment area of parent's HMO plan. Dual enrollment is permitted in this situation. Tribal employer must notify both carriers.

Slide 26



**Termination and Cancellation**

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT 26



## How Does FEHB Coverage End?

A tribal employee's FEHB enrollment can end by:

- **Termination:** a required action made by the tribal employer maintaining the FEHB enrollment – (SF 2810)
- **Cancellation:** a voluntary action made by the tribal employee – (SF 2809)

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To terminate an FEHB enrollment, the tribal employer must use a Notice of Change in Health Benefits Enrollment, Standard Form (SF) 2810

You may access SF 2810 at [http://www.opm.gov/Forms/pdf\\_fill/sf2810.pdf](http://www.opm.gov/Forms/pdf_fill/sf2810.pdf)

To cancel an FEHB enrollment, a tribal employee must complete a FEHB Health Benefits Election Form, Standard Form (SF) 2809 and submit it to the tribal employer.

You may access SF 2809 at [http://www.opm.gov/Forms/pdf\\_fill/sf2809.pdf](http://www.opm.gov/Forms/pdf_fill/sf2809.pdf).

For more information on how to fill out the SF 2809 or SF 2810, please see:

- SF 2809 Guidance for Tribal Employees
- SF 2809 Guidance for Tribal Employers
- SF 2810 Guidance for Tribal Employers
- Training module of SF 2809 and SF 2810 Guidance



## FEHB Termination for Tribal Employees

Following are some of the main reasons that a tribal employee's FEHB enrollment can terminate:

- Separation from employment
- Begin leave without pay or military service (and elect not to continue)
- End of 365 days of leave without pay or 24 months of military service (if elected to continue)

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These are the most common reasons why a tribal employee's FEHB enrollment would terminate. For additional information, see FEHB regulations at 5 CFR 890.304 and the *Tribal FEHB Handbook* Chapter 7 on Termination and Conversion.

**Note:** Separation from employment includes retirement.

A tribal employee who begins leave without pay **must** elect to:

- continue FEHB for up to 365 days and be responsible for his/her share of the premium, **or**
- have his/her FEHB terminate at the end of the last pay period for which premiums were withheld.

**Note:** *If the tribal employee does not make an election, coverage terminates at the end of the last pay period for which premiums were withheld.*

In either case, the tribal employee may enroll when he/she returns to pay status. More detailed information is in the *Tribal FEHB Handbook* Chapter 6, Leave Without Pay and Insufficient Pay.

A tribal employee who enters active military service may elect to:

- have his/her FEHB terminate on the day he/she is placed on leave of absence for military duty, **or**
- continue his/her FEHB for up to 24 months of active duty.

**Note:** *If the tribal employee does not elect termination, the FEHB continues.*

In either case, the FEHB is reinstated upon reemployment, unless the tribal employee postpones reinstatement to use extended TRICARE. More detailed information is in the *Tribal FEHB Handbook* chapter 9 on Military Service.



## FEHB Termination for Family Members

Following are some of the main reasons that a family member will lose coverage under the tribal employee's Self and Family FEHB enrollment:


- eligible child attains age 26
- tribal employee's spouse is divorced from tribal employee

The tribal employer does not issue an SF 2810 for family members

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Please remind your tribal employees who have Self and Family FEHB **that it is their responsibility to know when a family member is no longer eligible for coverage and to notify the FEHB plan.** If the plan is not notified and benefits are provided in error, the member is liable for those benefits. The plan will recover any benefits paid for claims, or in the case of an HMO, bill for services provided, after the date the family member's eligibility for coverage ended.

The tribal employer does not issue SF 2810 when a family member loses coverage.



## FEHB Termination (contd)

Tribal employees and family members whose FEHB coverage terminates have:

- A free 31-day extension of coverage
- Right to convert to an individual policy
- Eligibility to enroll for Temporary Continuation of FEHB Coverage

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT 30


The individual whose FEHB coverage terminates has the right to convert to individual non-FEHB coverage with the same FEHB plan. A conversion policy differs from FEHB plans and has different rates and benefits. The plan may not exclude an individual because of a pre-existing medical condition.

When a tribal employee's FEHB enrollment terminates, the tribal employer must give the tribal employee a notice of his/her right to convert to an individual policy on the Notice of Change in Health Benefits Enrollment Form (SF 2810). The tribal employer must provide the tribal employee with this notice **immediately** upon the tribal employee's FEHB enrollment termination, but **no later than 60 days from the termination date**.

To apply for conversion, the tribal employee must complete the back of his/her copy of the SF 2810 and send it to his/her plan within 31 days from the date of the tribal employer's notice to the tribal employee (part H of SF 2810), but **no later than 91 days from the date the FEHB enrollment terminates** (Part A, item 8 of SF 2810).

The tribal employer will not issue SF 2810 when a family member loses coverage. It is the responsibility of the tribal employee or the tribal employee's family member to know when the family member loses coverage. If the family member is interested in converting to individual coverage with the FEHB plan, he/she must request conversion within 31 days after his/her coverage as a family member terminated.

See the *Tribal FEHB Handbook* chapter 7 on Termination and Conversion  
Also see the Temporary Continuation of Coverage section of this training module.



### Termination Effective Dates

- **Enrollees** - End of the last day of the pay period in which the terminating event happened
- **Family Members** - the day the family member is no longer an eligible family member

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For example:

**Enrollees:**

- If a tribal employee separates from his/her job, the enrollment terminates at the end of the last day of the pay period in which he separates.
- If a tribal employee elects to continue enrollment during leave without pay, the enrollment terminates at the end of the last day of the pay period that includes the 365<sup>th</sup> day in leave without pay status.

**Family Members:**

- For a child who attains age 26, coverage terminates at midnight of the day immediately before his/her 26th birthday (i.e., the child is not covered on his /her birthday).
- For a spouse who loses coverage because of divorce, coverage terminates at midnight of the day immediately before the date of final divorce (i.e., the spouse is not covered on the date of divorce).



## Cancellation

- **QLE:** Effective at the end of the last day of the pay period in which the tribal employer receives the SF 2809
- **Open Season:** Effective at the end of December 31<sup>st</sup>
- No 31-day temporary extension of coverage or conversion right or TCC for tribal employees or family members

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A tribal employee cancels his/her FEHB enrollment by completing SF 2809, checking part F, signing the form, and submitting it to the tribal employer.

The tribal employer enters the information into TIPS. A tribal employer who does not have access to TIPS may fax the information to the National Finance Center (NFC) at 504-426-9796.

*Note:* Part F on SF 2809 refers the tribal employee to information on page 3 of the instructions. The tribal employee may disregard the section at the top right column of page 3.

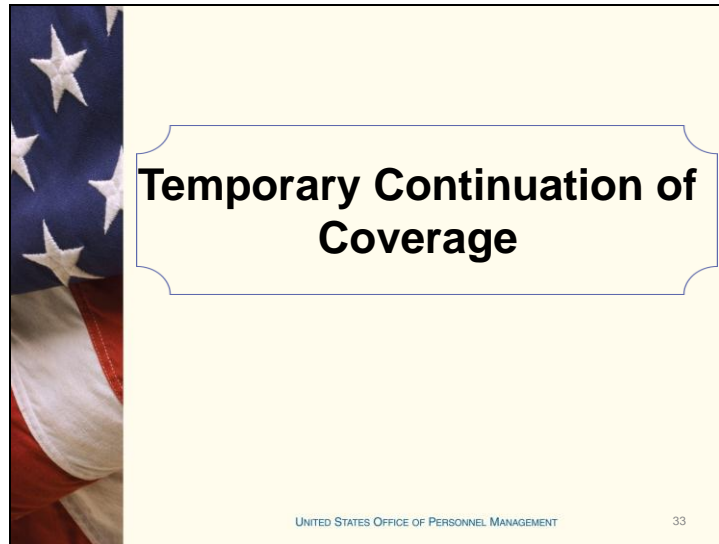
A tribal employee who participates in premium conversion may cancel in accordance with the QLEs in Table 1 of SF 2809 (Table of Permissible Changes in FEHB Enrollment and Premium Conversion Election).

A tribal employee who does not participate in premium conversion may cancel at any time.

Family members who lose coverage due to a tribal employee's cancellation are not eligible for Temporary Continuation of Coverage (TCC).




Slide 33



**Temporary Continuation of Coverage**

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT 33



## Temporary Continuation of Coverage (TCC)

- Similar to COBRA in the private sector
- Available to tribal employees who lose FEHB coverage because they separate from their job
- Also available to former eligible family members who lose eligibility for FEHB coverage
- TCC enrollee pays total premium (tribal employer and tribal employee share ) + 2 percent

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If a tribal employee loses his/her FEHB coverage because the tribal employee separates from tribal employment, the tribal employee may enroll under the TCC provision of the FEHB law to continue his/her coverage for up to 18 months.

*Exception:* a tribal employee is not eligible for TCC if the tribal employee's separation is due to gross misconduct.

A tribal employee's family members who lose coverage because they are no longer eligible family members may enroll under TCC to continue FEHB coverage for up to 36 months.

These slides contain the highlights of continuing FEHB coverage under the TCC provisions. See the *Tribal FEHB Handbook* Chapter 8 on Temporary Continuation of Coverage for more detailed information



## TCC – Initial Enrollment

- Tribal employer must notify separating tribal employees
- Tribal employees, children, and former spouses are responsible for notifying tribal employer
- TCC coverage is effective at the end of the 31-day extension of coverage

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When a tribal employee separates from tribal employment and is eligible for temporary continuation of coverage (TCC), the tribal employer must notify the tribal employee no later than **61 days after the tribal employee's separation** of his/her opportunity to elect TCC.

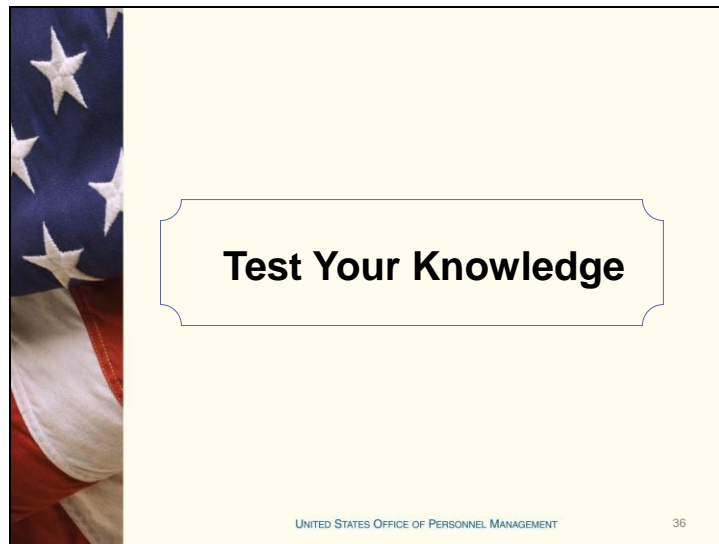
If a tribal employee's child becomes eligible for temporary continuation of coverage (TCC), it is the tribal employee's responsibility to notify the tribal employer of the change in the child's status. The tribal employee must provide the child's name, address, and date of the event that caused the loss of FEHB coverage within **60 days from the loss of coverage**. The tribal employer then has 14 days to notify the tribal employee's child of his/her TCC rights.

If a tribal employee's former spouse is eligible for temporary continuation of coverage (TCC), either the tribal employee or his/her former spouse must notify the tribal employer within **60 days after the date of the divorce** or annulment. The tribal employer then has 14 days to notify the tribal employee's former spouse of his/her TCC rights.


Once the former tribal employee or former eligible family member submits SF 2809 to enroll for TCC, the tribal employer must fax a copy of the SF 2809 to NFC at xxx-xxx-xxxx. NFC will then process the FEHB TCC enrollment and notify the enrollee of the payments due.

**Note:** The TCC enrollment is a part of the Direct Pay Remittance System (DPRS) and is not to be entered into TIPS.

Slide 36



The next section provides scenarios to test your knowledge of the material in the Enrollment Module. Unless otherwise specified, assume the individual in the questions is a tribal employee who is enrolled in an FEHB plan.




### **Scenario #1**

Ellen starts work on June 6. She works June 6-7, is out sick on June 8, and returns June 9, when she submits an SF 2809 electing FEHB.

**When is her FEHB coverage effective?**

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**A. First Day of Next Pay Period**

FEHB enrollment is effective on the first day of the pay period after the one in which the tribal employer receives SF 2809 (and she was in pay status in the pay period before)

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*Note:* There is no coverage from the first day of employment.




## Scenario #2

Ingrid brings you an SF 2809 during Open Season canceling her FEHB enrollment for the event code “Open Season.” Her cancellation is effective:

- A. At the end on the year (December 31)
- B. Never. She doesn't have a QLE so she can't cancel
- C. At the end of the pay period in which the tribal employer receives the SF 2809

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**A. At the end of the year  
(December 31st)**


During Open Season:

- All FEHB enrollees can change or cancel enrollment
- All eligible employees can enroll in FEHB
- No QLE is needed

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All Open Season changes are effective on January 1.






**Scenario #3**

Joseph is enrolled in an Oklahoma HMO. He can change his FEHB enrollment when his daughter goes away to college in California.

True or False?

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**A. True**

An enrollee in may change his/her FEHB HMO enrollment if a family member moves out of the HMO service area.

The change is effective the first day of the pay period that begins after the tribal employer receives the SF 2809.

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Joseph should change to a nationwide fee-for-service plan.

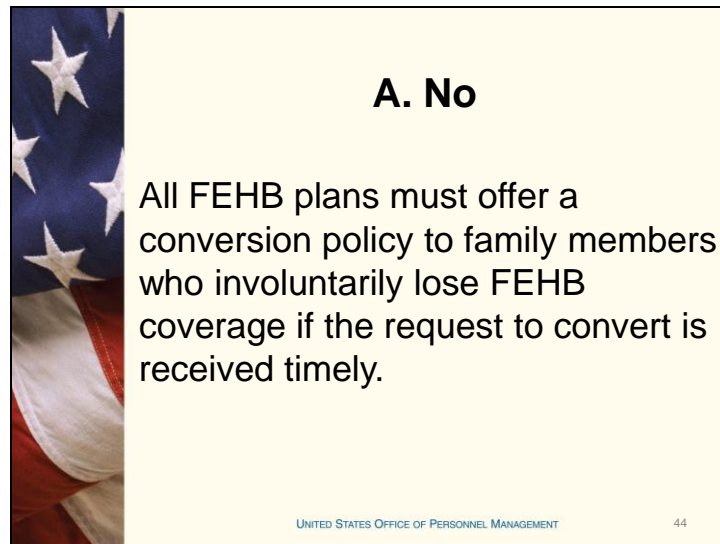


**Scenario #4**

Mike's son enrolled in TCC when he turned age 26. He has been covered under TCC for 36 months and wants a conversion policy

Can his FEHB plan deny his enrollment in a conversion policy?

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The slide features a vertical graphic of the American flag on the left side. The main content is on a light yellow background. At the top center, the text "A. No" is displayed in a bold, black font. Below this, a paragraph states: "All FEHB plans must offer a conversion policy to family members who involuntarily lose FEHB coverage if the request to convert is received timely." At the bottom of the slide, there is a small footer that reads "UNITED STATES OFFICE OF PERSONNEL MANAGEMENT" on the left and "44" on the right.

**A. No**

All FEHB plans must offer a conversion policy to family members who involuntarily lose FEHB coverage if the request to convert is received timely.

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The conversion policy must be with the FEHB plan that was covering the family member when he/she lost coverage.

Generally, a request to convert must be received by the carrier within 31 days after losing coverage.

The plan may not exclude a family member for a pre-existing medical condition

Rates and benefits will be different from those under the FEHB plan.

*Note:* If Mike's son were to lose FEHB coverage because Mike *cancel*ed his Self and Family FEHB enrollment, the son would not have the same conversion right.



**Scenario #5**

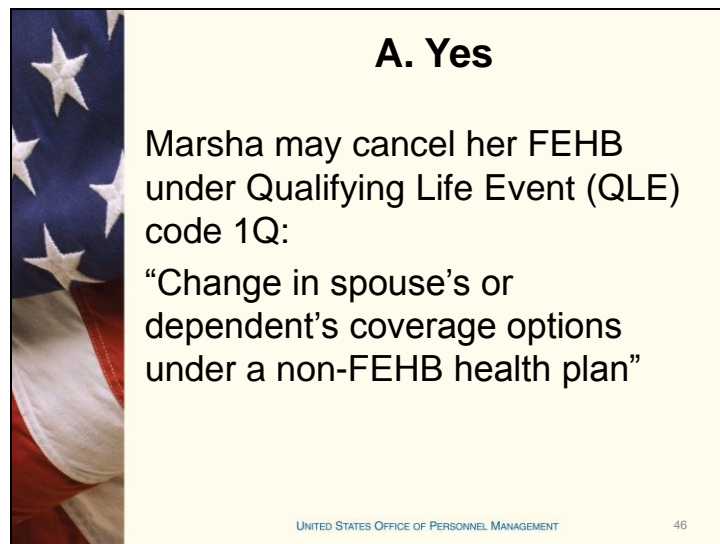
Marsha, a tribal employee, is married to a County teacher. Marsha has FEHB Self and Family coverage.

In August, she tells her tribal employer that she wants to cancel her FEHB coverage since her spouse's employer is offering a new non-FEHB plan.

Can she cancel her FEHB?

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For the purpose of this question, a non-FEHB plan means a plan that does not participate in the FEHB Program.

The slide features a vertical graphic of the American flag on the left side. The main content is on a light yellow background. At the top, the text "A. Yes" is centered. Below it, the text reads: "Marsha may cancel her FEHB under Qualifying Life Event (QLE) code 1Q: 'Change in spouse's or dependent's coverage options under a non-FEHB health plan'". At the bottom of the slide, there is a small footer that says "UNITED STATES OFFICE OF PERSONNEL MANAGEMENT" and the number "46".

**A. Yes**

Marsha may cancel her FEHB under Qualifying Life Event (QLE) code 1Q:  
"Change in spouse's or dependent's coverage options under a non-FEHB health plan"

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For the purpose of this question, Marsha's tribal employer offers premium conversion to its tribal employees and Marsha is participating in premium conversion.

She would need to submit her cancellation SF 2809 from 31 days before to 60 days after the date her spouse's employer began offering a new health plan.

If she did not do so, she would have to wait until the next Open Season or until she has another QLE.

If Marsha was not participating in premium conversion, she could cancel her FEHB enrollment at any time.




### **Scenario #6**

Misty is divorced with 2 children and is enrolled for Self and Family. Misty gets remarried and her plan asks her tribal employer for an SF 2809 to add her new spouse to her enrollment.

**Should Misty's tribal employer complete an SF 2809?**

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**A. No**

Since Misty has a Self and Family enrollment, her new husband is covered from the date of marriage. Misty only needs to call her plan to add her new husband.


The plan may ask Misty for proof of the marriage.

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A tribal employer does not complete a new SF 2809 to add an eligible spouse to an existing Self and Family enrollment. There is no change in premium, therefore, it is sufficient for the tribal employee to notify the FEHB plan.

The plan may ask for proof of the marriage.






**Scenario #7**

Bruno is enrolled for Self Only FEHB. In October he adopts a child. During Open Season he submits an SF 2809 changing his enrollment to Self and Family based on his change in family status.

When is the change in FEHB enrollment effective?

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**The first day of the pay period in which he adopted the child**


A change in enrollment made in conjunction with the birth or addition of a child is effective on the first day of the pay period in which the child is born or added as a family member.

It was just a coincidence that this event occurred during Open Season

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*Note 1:* For this QLE there is no requirement that a tribal employee be in a pay status for part of a pay period before the change can take effect.

*Note 2:* If Bruno does not want his son covered under his FEHB enrollment until January 1, he may use the Open Season event code in part D of his SF 2809.



### **Scenario #8**

Norman enrolled in an FEHB plan on 5/1/2012, during his Initial Enrollment Opportunity. His divorce was final 6/30/2013. The divorce decree said he had to provide coverage for his ex-wife so he kept his Self and Family enrollment. Norman remarried 10/01/2013.

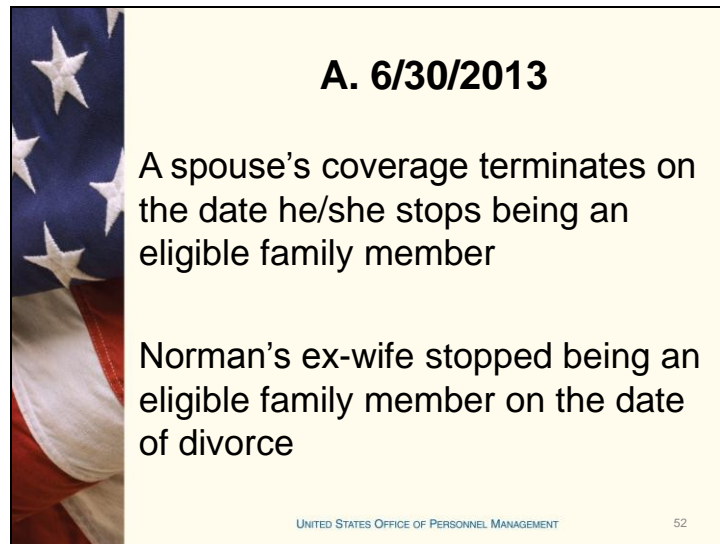
When did his ex-wife's coverage terminate?

- A. 6/30/2013
- B. 10/01/2013
- C. 11/01/2013

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We made these dates in the future so they would be after the Initial Enrollment Opportunity.

The slide features a vertical graphic of the American flag on the left side. The main content is on a light yellow background. The text is as follows:

**A. 6/30/2013**


A spouse's coverage terminates on the date he/she stops being an eligible family member

Norman's ex-wife stopped being an eligible family member on the date of divorce

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As of the divorce date, Norman's ex wife will have:


- A free 31-day temporary extension of FEHB coverage
- The right to convert to individual coverage with Norman's FEHB plan without regard to any pre-existing condition
- Eligibility to enroll for temporary continuation of coverage (TCC) for 36 months from the date of divorce



**Scenario #8 (contd)**

What should Norman have done when the divorce was finalized?

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**Norman Should Have Called  
His Plan and Have Them  
Remove His Ex-Wife**

The plan may have asked  
Norman for proof of the divorce

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Proof of the divorce would be a copy of the final divorce decree.



**Scenario #8 (contd)**

What if the Plan was unaware of the divorce and his ex-wife continued receiving benefits?

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**The Plan Could Seek Reimbursement From Either Norman's Ex-Wife or the Providers It Paid**

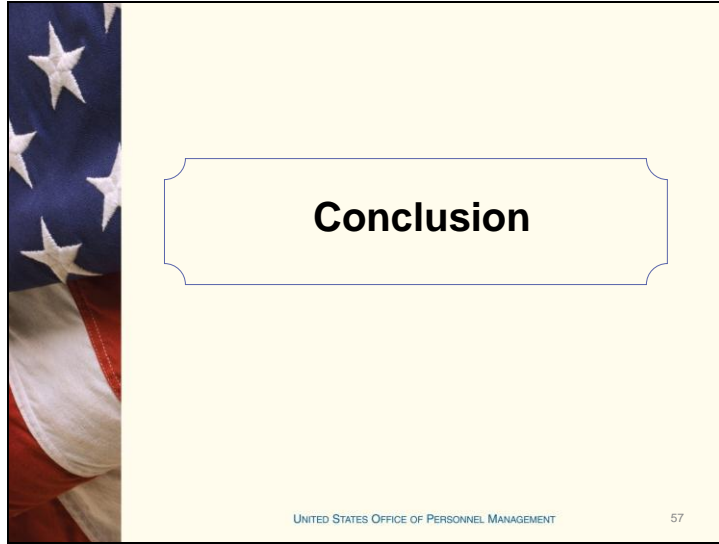
The FEHB Plan is not obligated to provide benefits for ineligible family members, even if premiums have been paid

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Slide 57



The slide features a vertical strip of the American flag on the left side. The main background is a light yellow gradient. In the center, the word "Conclusion" is written in a bold, black, sans-serif font, enclosed within a thin blue rectangular border with rounded corners. At the bottom of the slide, the text "UNITED STATES OFFICE OF PERSONNEL MANAGEMENT" is displayed on the left, and the number "57" is on the right.

**Conclusion**

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## Tribal Employer Responsibilities

- Provide general guidance to tribal employees
- Ensure FEHB forms are properly completed
- Administer Initial Enrollment Opportunity and conduct annual Open Season
- Promptly enter SF 2809 and SF 2810 data into TIPS

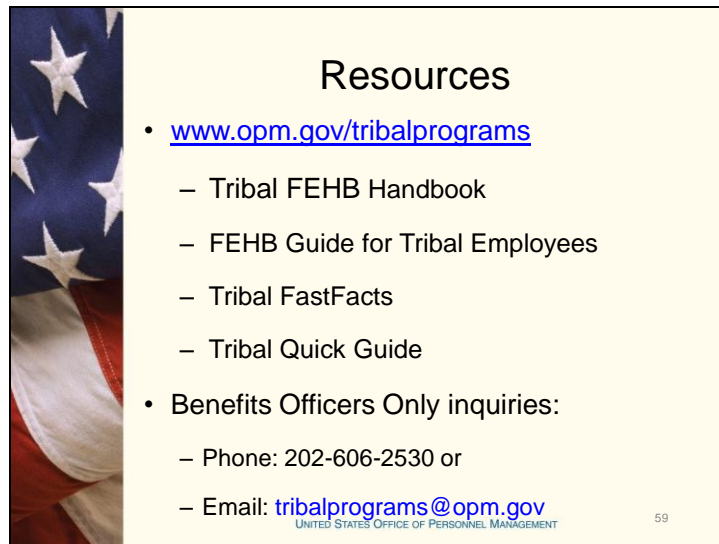
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The tribal employer enrolls eligible tribal employees in the FEHB plan of their choice through the Tribal Insurance Processing System (TIPS). TIPS is the online enrollment portal for the tribal employers.

Generally, the tribal employer's responsibilities in administering the enrollment of tribal employees into FEHB include:

- Distributing FEHB information,
- Providing guidance to tribal employees,
- Collecting enrollment forms,
- Making eligibility determinations,
- Reviewing enrollment forms for accuracy
- Verifying information when necessary.
- Approving or denying enrollment actions
- Entering FEHB enrollment data into NFC's TIPS



## Resources

- [www.opm.gov/tribalprograms](http://www.opm.gov/tribalprograms)
  - Tribal FEHB Handbook
  - FEHB Guide for Tribal Employees
  - Tribal FastFacts
  - Tribal Quick Guide
- Benefits Officers Only inquiries:
  - Phone: 202-606-2530 or
  - Email: [tribalprograms@opm.gov](mailto:tribalprograms@opm.gov)

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Please visit [www.opm.gov/tribalprograms](http://www.opm.gov/tribalprograms) often. Numerous resources can be accessed here.

The Tribal FEHB Handbook is a source of detailed guidance on the FEHB Program for tribal employers and Benefits Officers.

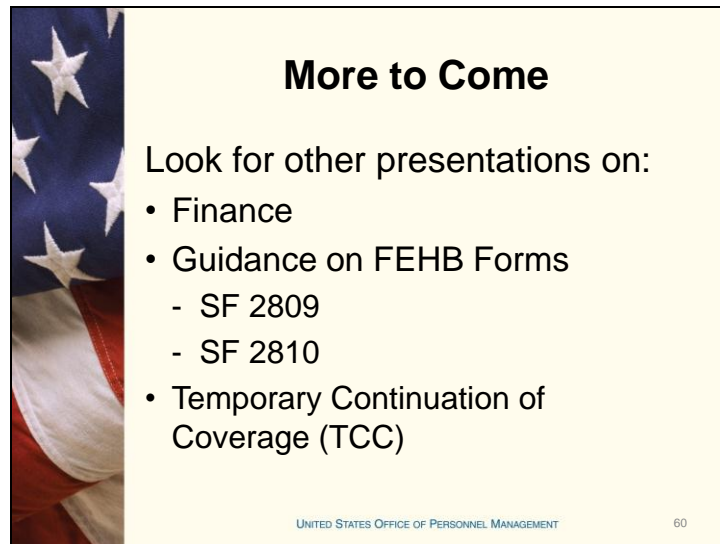
The FEHB Guide for Tribal Employees explains the FEHB Program, provides guidance on making enrollment decisions, and has instructions for employees during their Initial Enrollment Opportunity.

Tribal FastFacts provide basic information about the FEHB Program for tribal employees.

The Tribal Quick Guide provides answers to over 30 common questions about the FEHB Program.

Tribal employees must contact their Benefits Officer if they have any questions. Only Benefits Officers can contact OPM at [tribalprograms@opm.gov](mailto:tribalprograms@opm.gov) if they need assistance to answer employees' questions. This email address is reserved for Benefits Officers only.

In addition, Benefits Officers can phone 202-606-2530 to reach the “Tribal Desk”.



**More to Come**

Look for other presentations on:

- Finance
- Guidance on FEHB Forms
  - SF 2809
  - SF 2810
- Temporary Continuation of Coverage (TCC)

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OPM is in the process of creating additional detailed modules for the following topics:

- Enrollment
- Finance
- Guidance on FEHB Forms
- Temporary Continuation of Coverage (TCC)

We will inform you via the [tribalprograms@listserv.opm.gov](mailto:tribalprograms@listserv.opm.gov) as they become available.

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