

Office of Personnel Management (OPM)
Healthcare & Insurance (HI)

**Federal Flexible Spending Account Program
(FSAFEDS) Administration Services
24361820D0002**

ORDERING GUIDE

This Ordering Guide sets forth the procedures for issuing Task Orders against the Indefinite Quantity Multi-Agency Contract (MAC) by agencies which offer FSAFEDS participation as a benefit to their employees.

**Office of Personnel Management
Office of Procurement Operation (OPO)
Date Posted: December, 2020
Version: 001**

TABLE OF CONTENTS

Section:	Page #:
About the Ordering Guide	3
A. Program / Contracts	3
B. Points of Contact	3
C. Content and Issuance of Task Orders	4
D. NAICS & PSC Codes	4
E. Task Order Issuance Process	4
F. Task Order Duration and Periods of Performance	5
G. Minimum and Maximum Order Limitations	6
H. Mandatory Reporting	6
I. Suspension of Performance / Stop Work Order / Government Shutdown	6
J. Task Order Closeout	7

FSAFEDS Program Administration Services Multi Agency Contract (MAC)

Ordering Guide:

This ordering guide is written for use by OPM and all agencies that provide FSAFEDS as a benefit to their employees. This guide explains how the MAC will be used to efficiently monitor usage and agency payments for the services being provided by the new OPM Contractor.

A. Program/Contracts:

The services covered under the FSAFEDS MAC and all related Task Orders shall be within the scope specified in the MAC PWS included within the awarded FSAFEDS MAC contract (24361820D0002).

Services under the FSAFEDS MAC are limited ONLY to paying each agency's share of the pre-priced services to the awarded Contractor. This MAC may be used by any agency which offers FSAFEDS services to its employees during open season. All agencies who provide FSAFEDS as a benefit to their employees MUST pay for the per-employee costs associated with providing those services and shall do so by issuing a Task Order against the MAC to fund their employee enrollment.

The four-year six-month contract period reflected in the awarded MAC includes a six-month startup period prior to actual performance of services, followed by a three-year base period, and one 12-month option period for performance of FSAFEDS Program Administration Services.

Task Orders against the MAC may not extend beyond the final period of performance of the MAC contract, including any option periods exercised.

B. Points of Contact:

Contracting Officer's Representative (COR):

Arleen Russell, OPM Healthcare & Insurance

FSA@opm.gov

Administrative Contracting Officer (ACO):

An ACO has not yet been appointed. The Procuring Contracting Officer (PCO) at OPM, Barbara Hansen retains administration of the MAC until that time.

For delivery of signed Task Orders to Contractor only (no other communications):

FSAFEDSBilling@healthequity.com

Content and Issuance of Task Orders:

Utilizing Agencies may not order any additional services against the MAC, aside from simply paying for their own share of services relative to their employee enrollment.

OPM Contracting Officers (COs) shall issue Task Orders for the start-up costs, their own agency usage and for any services to be paid from the Risk Reserve Account.

OPM's CO's are **not** responsible for issuance of Task Orders for other utilizing agencies' share(s) of the cost of services.

c. NAICS & PSC Codes:

- North American Industrial Classification System (NAICS) Code for the BPA and all Calls shall be 524292 – Third Party Administration of Insurance and Pension Funds.
- Product Service Code (PSC) for the BPA and all Calls shall be R711 – Support-Management: Banking.

D. Task Order Issuance Process:

This is a SINGLE AWARD IDIQ Multi Agency Contract (MAC) intended for government-wide use, and was advertised and competed as such, so competition is not required prior to issuance of future Task Orders. All Task Orders for FSAFEDS services must be issued to the single awardee.

There will be three different types of Task Orders possible against the MAC:

1. The initial Task Order, for Start Up Period / Start Up Costs - This will be issued by OPM and funded from Risk Reserve Funds.
2. Task Orders for Buydown¹ – These are issued only by OPM and are intended to reduce the financial burden for utilizing agencies by paying a portion of the fixed price per employee/account service fees.
3. Task Orders for Agency Service Fees – These will be issued by each agency which provides FSAFEDS as a benefit to its employees so that there is a contractual obligation between each utilizing agency and the FSAFEDS Contractor against which the Contractor

¹ Buydown: When appropriate based on balance of funds in the Risk Reserve Account, OPM may issue a Buydown Task Order which funds a portion of the fixed price per employee/account service fees. When a buydown Task Order will be provided to the Contractor, it will reduce the expense to utilizing agencies. OPM will notify the utilizing agencies accordingly so they may reduce their Task Orders accordingly. Buydown is a partial payment of the service fee which acts as a subsidy. The SUM of the buydown Task Order rate and the utilizing agencies Tasks Order rate will always equal the total contracted rate for the given performance period.

may invoice and from which the utilizing agency will pay its share of fees (after adjustment for any buydowns paid for by OPM.

Task Orders are to be Fixed Price based on the prices established in the MAC, or at reduced prices designated by OPM Healthcare & Insurance (HI) following issuance of a buydown order.

Sample Task Order:

Form Required: OPM will utilize the form OF347 for issuance of Task Orders against this MAC awarded by an OPM CO and recommends the OF347 for use by other agencies. Other agencies may utilize whatever form is appropriate based on their own agency guidance for issuance of Task Orders against a contract administered by another agency.

Task Order Numbering: Contracting Officers issuing Task Orders shall ensure they utilize Task Order numbering appropriate to their own agency, as prescribed by FAR.

A sample task order for Agency Service Fees is attached for illustration purposes.

E. Task Order Duration / Period of Performance:

Annual Task Orders for service fee payments must coincide with the Calendar Year periods of performance for the MAC itself. Because services start January 1 of each year, following open season enrollment, each participating agency will receive an enrollment notification from the contractor indicating the number of agency employees enrolled in each account type and the rate(s) per account for the coming plan year so that the agencies can prepare their Task Orders before services begin. For 2021 plan year, the first year of the new process, this will be sent in February 2021.

It is recommended that participating agencies use a new Task Order number each calendar year of participation in order to ensure billing tracks cleanly to each calendar year.

Service Fee Task Order Funding:

A single enrolled employee participant signing up during open season means that their agency is required to issue a funded Task Order to the Contractor and pay its share of service fees for the whole calendar year. Agencies have statutory authority to fund a task order across fiscal years because the period of performance is limited to 12 months. Agencies with questions concerning the use of appropriations across fiscal years should consult with their General Counsel.

Some agencies may have established written policies against allowing funding to cross fiscal years. In these cases, the participating agency may reference its own incremental funding authorities, as applicable, to fund only the January through September months from one fiscal year's funds and leave the period of October through December unfunded until October 1. Funding and payment for the remaining 3-month balance of the calendar year is not "optional," and services cannot be canceled based on limited availability of funds. The entire

calendar year period of performance must be shown on Task Orders using split funding and may be listed on separate line items or noted clearly as “incrementally” funded. Agencies without such established written policies are required to obligate funding IN FULL prior to the January 1 start of services each year.

Line items for funding of FSAFEDS Task Orders must reference the specific CLIN from the MAC applicable to that calendar year and plan type, as well as the price per account. A notification letter from OPM each year will detail these figures.

Enrollment Adjustments Outside of Open Season:

As new employees sign up to establish FSAFEDS accounts outside of open season, as permissible by regulations, OPM HI shall notify participating agencies of the increases or decreases in their enrollment numbers, and the participating agencies will be required to increase funding to pay for any increases accordingly. Funding modifications shall be issued (unilaterally) by each participating agency as needed to adjust for usage and enrollment changes.

F. Minimum and Maximum Order Limitations:

There is no minimum order limit for the value of individual Task Orders. The MAC minimum is equal to the Start Up Costs and is satisfied by issuance of the Start-Up Costs Task Order. The maximum value of all calls issued against the MAC is \$250,000,000.00.

G. Mandatory Reporting:

In accordance with FAR 4.606(a)(ii)(A)(2), all Task Orders issued against the MAC which use any sort of **Appropriated Funds** are required to have FPDS reporting completed by the CO for that agency.

Task Orders issued against the MAC which use Non-Appropriated Funds are not required to be reported in FPDS, in accordance with FAR 4.606(b). Follow agency procedures for FPDS reporting of non-appropriated funds awards.

Agencies not subject to the FAR should refer to FAR 4.606(d) for guidance with regard to FPDS reporting of Task Orders against this MAC.

Regardless of funding type, and regardless of whether the issuing agency is subject to the FAR, utilizing agencies must provide **copies of all Task Orders issued against the FSAFEDS MAC, as well as all modifications thereto** via email to OPM Healthcare & Insurance at InternetFSA@opm.gov, with copy to the OPM Contracting Office at FSAFEDSTOTracking@opm.gov. OPM needs to be able to accurately monitor and track usage against the ceiling of \$250,000,000.00 and is required to complete mandatory reporting of

usage to the Office of Management and Budget (OMB). Utilizing agencies should refer to the Benefits Administration Letter (BAL) for additional details.

H. Suspension of Performance / Stop Work Order / Government Shutdown:

FSAFEDS Services are not suspended in event of a Government Shutdown.

I. Task Order Closeout:

Following completion of performance of each calendar year, utilizing agency COs shall perform at a minimum:

- Proof of payment of final invoice
- Release of Claims from the Contractor
- Modification of Task Order for deobligation of any remaining unused funds

J. Attachments:

- Attachment 1 - Sample Buydown Task Order, unsigned
- Attachment 2 - Sample Agency Fees Task Order, unsigned