SUBJECT: Update on Tribal Employer Participation in the Federal Employees Health Benefits Program

Introduction

This Carrier Letter provides an update on implementing participation of federally recognized Indian tribes, tribal organizations, and urban Indian organizations (tribal employers) into the Federal Employees Health Benefits (FEHB) Program. This Carrier Letter supplements and amends Carrier Letter 2012-04 (Indian Tribe Participation in the Federal Employees Health Benefits Program).

For more information on background of this initiative, the carrier workgroup, training the tribal employers, eligibility, enrollment, premiums, and brochures, please see Carrier Letter 2012-04.

Payroll Office Number

The Office of Personnel Management (OPM) made a change in the payroll office number for tribal employees from 14050000 to 12400096. Please correct your enrollment files to reflect the correct payroll office number of 12400096.

Alternate Identifier

If a tribal employee, or family member, does not want to disclose or does not have a Social Security Number (SSN), a tribal employer cannot force them to disclose the SSN(s). The tribal employer will create and maintain an alternate identifier for only the employee and place it within the SSN field in the Standard Form (SF) 2809 or SF 2810. The first two digits of the alternate identifier are 99, the next four digits are the tribal employer’s Billing Unit/personnel office identifier (POI) for the tribal employee, and the last three digits are for the tribal employer to assign.

For example, a tribal employee from Billing Unit/POI 7001 refuses to disclose his/her SSN. The individual’s alternate identifier would be 997-00-1001.

The tribal employer must maintain the list of alternate identifiers to ensure no creation of duplicate identifiers.

The alternate identifier will only be used by the carriers and the tribal employers for the Centralized Enrollment Reconciliation Clearinghouse (CLER).
Training the Tribal Employers

The five carrier training sessions on including tribal employees in the FEHB Program are now complete. If your staff member(s) attended one of these sessions, they may now train tribal employers and employees about FEHB for tribal employees. If they are interested in being a carrier trainer, and have not already done so, please complete the below table and email feio.inquiry@opm.gov with the name of your Plan; the individual(s) from your Plan who would like to train tribal employers and employees; the email address and phone number of the individual(s); and the geographic location where the trainer(s) is available.

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Individual(s) from Plan</th>
<th>Email &amp; Phone Number of Individual(s) from Plan</th>
<th>Geographic Location</th>
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Once OPM compiles the list of individuals willing to train, OPM will assess the tribal training needs. If your staff member is chosen to provide training, OPM will send that staff member materials to review prior to the training. In the meantime, materials are being posted on a rolling basis on the tribal programs website at http://www.opm.gov/tribalprograms and on YouTube at http://www.youtube.com/watch?v=N32fjV_stI8&list=PLE39C952DAD3C41FF&index=1&feature=plpp_video.

Carrier Questions

Attachment 1 to this Carrier Letter is a list of questions from carriers and answers from OPM about enrolling eligible tribal employees in the FEHB Program. Attachment 1 amends and supersedes the questions and answers provided to carriers via the carrier listserv on 3/9/2012, 3/23/2012, 4/4/2012, and 4/11/2012. Outside of grammar and stylistics changes, the only content changes from the original carrier listservs occurred with questions 1, 2, 3, 4, 15, 20, 31, 45, and 52.

- **Question 1:** Replaced “The tribal employers needed to let Office of Personnel Management (OPM) know by March 1st if they wanted coverage by May 1st. Moving forward,” with “The Office of Personnel Management (OPM) must receive a signed agreement to purchase FEHB coverage from a tribal employer at least two months before the effective date of coverage. For example, OPM must receive an agreement by August 1st for an October 1st start date.”
- **Question 2:** Removed reference to attached draft Handbook and added a web address for the draft Handbook
- **Question 3:** Replaced “OPM has asked the tribal employers on the application to tell us if they have Internet access. Once we get that information, we will let you know. What we’ve seen from the tribal desk is that virtually all tribal employers have Internet access.” with “OPM includes a question about Internet access in a tribal employer’s application packet. Once the application is finalized, this information will be sent to the carriers. To date, virtually all tribal employers have Internet access.”
- **Question 4:** Changed language from “will go live” to “went live” and added “OPM-Macon received the first tribal enrollments on April 5, 2012. The first tribal enrollments were
available for the carriers to pick-up on April 7th (through the same method carriers pick-up data for Federal agencies).”

- Question 15: **Changed** the Payroll Office Number from 1405000 to **12400096**.
- Question 20: **Added** “or the tribal employer group loses eligibility” to the question.
- Question 21: **Added** “for each enrollment” to the answer.
- Question 31: **Replaced** “However, the rates in the brochure may not be applicable. Tribal employees should contact their employer to see what premiums they will pay.” with “However, the rate shares in the brochure may not be applicable because tribal employers may choose to pay a higher share of the premium. Tribal employees should contact their tribal employer to see what share of the premium they will pay.”
- Question 45: **Removed** “Once OPM completes the five carrier training sessions (the last one is March 28, 2012), OPM will send a follow-up email to all carriers. The email will ask that those carriers who attended a training session and are still interested in training tribal employers please email OPM expressing their interest in training tribal employers and the geographic location where they would like to conduct training.” The language was removed because the events have already occurred. The listserv email mentioned in the removed language was sent over the carrier listserv on 4/4/2012.
- Question 52: **Added** “OPM recommends that Plans assign at least two people to be given access to File Manager to have a back-up person.”

Questions 13 and 14 reference the Personnel Office Identifier (POI) and its location in enrollment transactions. **Attachment 2** is a sample POI file format.

Questions 16 through 19 discuss what happens in different scenarios when coverage ends for tribal employees. **Attachment 3** is a chart that summarizes question 16 through 19.

If you have questions, contact your contract specialist.

Thank you very much for your cooperation.

Sincerely

John O’Brien
Director
Healthcare and Insurance