

Attachment 1 – Carrier Questions

Notification of Tribal Participation

1. **Question:** When will the carriers be notified of the tribal employers that choose to purchase Federal Employees Health Benefits (FEHB) for tribal employees?

Answer: 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. As soon as OPM makes a decision about tribal employer participation, we will let carriers know via the carrier listserv.

2. **Question:** What information do the tribal employers have about FEHB for tribal employees?

Answer: OPM has been communicating with the tribal employers. We have a tribal workgroup set up, similar to the carrier workgroup. We have also issued Tribal Leader Letters. You can find the information that we have communicated to tribal employers on at www.opm.gov/tribalprograms. We developed a Handbook for the tribal employers similar to the Handbook for Federal employees. The Handbook is in draft form and available online at www.opm.gov/insure/health/tribes/tribalhandbook.pdf. We will inform you when the Handbook is finalized. In addition, OPM has focused on training for tribal employers by sending OPM staff out to various tribal events to train tribal employers.

3. **Question:** When will OPM provide the percentage of eligible tribal employers with web access?

Answer: 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.

Enrollment & the Initial Enrollment Opportunity

4. **Question:** When can tribal enrollments begin?

Answer: The Tribal Insurance Processing System (TIPS) went live March 22nd. 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).

5. **Question:** During the tribal enrollment period, there may be a chance that carriers have to postpone other meetings with agencies. Would OPM prefer that the carriers train the tribal employers or go to agencies?

Answer: Considering that tribal employers are a new audience of potential enrollees, you may want to give them priority.

6. **Question:** Is the Agreement between OPM and each tribal employer an “evergreen” agreement (agreement between two parties that is automatically renewed after each completion, or maturity period, until canceled by the either party) and what is the term of the agreement?

Answer: The Agreement is an “evergreen” agreement. It becomes effective on the date signed by OPM. The term of the Agreement signed by OPM in 2012 will be through December 31, 2012. The term will be automatically extended by twelve calendar months on January 1, 2013, and every January 1 thereafter unless the tribal employer delivers to OPM written notice of its intention not to extend the term of this Agreement at least 60 days prior to such extension.

7. **Question:** The 2013 rate proposal is due May 31, 2012. Carriers may not have any data or may have minimal data on tribal enrollees depending upon when they are allowed to enroll. How does OPM expect the carriers to account for what could be a significant shift that may occur just before the May 31st due date or throughout 2012 as potential members enroll in the plan?

Answer: OPM expects community-rated carriers to rate FEHB using practices consistent with their community-rated methodology. Plans are reminded that the demographic assumptions and experience period used in the proposal must be used in the reconciliation. Experience-rated plans, which are able to carry forward gains and losses, will be able to adjust for emerging experience in setting future year’s rates.

8. **Question:** At what point do tribal employees participate in the regular Open Season?

Answer: The tribal employers will come in during different months. Once the tribal employers are in and have their Initial Enrollment Opportunity (IEO), then they would participate in the regular Open Season.

9. **Question:** Once a tribal employee enrolls, can he/she change at any time or is he/she locked in?

Answer: Tribal employees can make changes during Open Season or due to the occurrence of certain Qualifying Life Events (QLEs).

Eligibility

10. **Question:** What plans will be available to a tribal employee?

Answer: If a tribal employer chooses to participate in FEHB, all tribal employees of that tribal employer will have access to all open Fee-for-Service and Health Maintenance Organization (HMO) FEHB plans available in their area, just like Federal employees.

11. **Question:** If a tribal employer has its own coverage, can it elect to keep that coverage along with FEHB?

Answer: Generally, if a tribal employer elects FEHB, it cannot have any other employer-sponsored health insurance coverage and cannot segment its tribal employees by offering a different set of health insurance benefits to different tribal employees. Tribal employees can purchase their own private individual coverage as long as the tribal employer does not sponsor the health insurance.

Personnel Office Identifier (POI) & Payroll Office Number

12. **Question:** What is a Personnel Office Identifier (POI)?

Answer: A POI is an identifier of a tribal employer billing unit. The POI is a 4-digit number, and for tribal employers, the POI will be in the 6,000 to 9,700 range.

13. **Question:** Where is the POI located in the enrollment transactions we will receive?

Answer: See Attachment 2.

14. **Question:** How soon will the carriers receive the POI information? This information will be helpful to them in setting up their systems.

Answer: OPM already sends the POI to the carriers for Federal agencies. For tribal employers, carriers will receive the POI through the OPM-Macon Data Hub as they already do for Federal agencies. When a tribal employer signs the Agreement to participate in the FEHB Program, OPM will send a listserv indicating: the POI, name of the tribal employer, number of eligible tribal employees, Tribal Benefits Officer contact information, and where the tribal employer is located.

We will provide carriers with a crosswalk that matches the POI with the tribal employer.

15. **Question:** Will a payroll office number be used?

Answer: Yes, the payroll office number for all tribal employees is **12400096**.

Terminations & Cancellations

16. **Question:** If an individual tribal employee **separates** from tribal employment, will he/she have:
- 31-day extension of coverage? – Yes
 - Ability to convert? – Yes
 - Ability to enroll in Temporary Continuation of Coverage (TCC)? – Yes, unless the separation was for gross misconduct.
17. **Question:** If an individual tribal employee **cancels** FEHB enrollment, but is still employed by the tribal employer, will he/she have:
- 31-day extension of coverage? – No
 - Ability to convert? – No
 - Ability to enroll in TCC? – No
18. **Question:** If a tribal employer group is **terminated** for non-payment of premiums or the employer group loses eligibility, will its tribal employees have:
- 31-day extension of coverage? – Yes
 - Ability to convert? – Yes
 - Ability to enroll in TCC? – No
19. **Question:** If a tribal employer decides to **voluntarily leave** FEHB, will its tribal employees have:
- 31-day extension of coverage? – No
 - Ability to convert? – No
 - Ability to enroll in TCC? – No
20. **Question:** How will carriers know if a tribal employer was terminated for non-payment of premiums or the tribal employer group loses eligibility?

Answer: If the tribal employer is terminated for lack of premium payments, the carrier will not receive an SF 2810. OPM will post a list on File Manager that includes the enrollees' names, plan code, DOB, SSN, and plan termination date.

This is so carriers can identify tribal employees who have their enrollment terminated, but are not eligible for TCC.

21. **Question:** How will carriers know if a tribal employer was cancelled voluntarily?

Answer: If it's a voluntary cancellation (e.g., a tribal employer drops coverage for its employees), the carrier will receive an SF 2809 for each enrollment without a 31-day extension of coverage or TCC.

TCC Eligibility & Enrollment:

22. **Question:** Will there be a different payroll office number for Temporary Continuation of Coverage (TCC) for tribal employees than for Federal employees?

Answer: No, the same payroll office number for TCC for Federal employees and their family members is used for tribal employees and their family members.

23. **Question:** If a tribal employer cancels FEHB participation and a tribal employee or family member was already enrolled in TCC, does TCC continue for the tribal employee or family member?

Answer: Yes, if the tribal employee or family member was enrolled in TCC at the time of the cancellation, the cancellation will have no impact on the TCC enrollment.

24. **Question:** Will TCC last for 18 months or for 36 months?

Answer: The rules will be the same as for Federal employees and family members. Federal employees have an 18-month TCC period, whereas children and former spouses of employees have a 36-month TCC period.

Retirement & Spouse Equity

25. **Question:** Will tribal employees be able to carry FEHB coverage into retirement?

Answer: No.

26. **Question:** Will former spouses of tribal employees be eligible for spouse equity coverage?

Answer: No.

Late/Non-Payment

27. **Question:** How will carriers know which tribal employers are paying late?

Answer: When NFC goes to collect the premium amount, it looks for the aggregate premium due for all of the tribal employer's employees. If that amount is not in the tribal employer's bank account, no premium amount is collected. OPM will inform the carriers via File Manager if a tribal employer is terminated due to failure to pay premiums. For more on File Manager, please see questions 47 through 56 of this attachment.

28. **Question:** Will OPM permit carriers to add a late payment charge for the tribal employers that pay late?

Answer: No.

29. **Question:** If a tribal employer doesn't pay, will it be out of FEHB for a whole year?

Answer: A tribal employer that is terminated for lack of premium payments will have to wait 12 months from the next Open Season to join. For instance, if a tribal employer fails to pay in June 2013, that tribal employer will only be able to join during the 2014 Open Season with an effective date of coverage of January 1, 2015.

30. **Question:** Will the premium used in the Medical Loss Ratio (MLR) calculation, which is provided to the carriers by OPM, include the premiums for the tribal employers?

Answer: Yes, it will include the premiums carriers receive from the tribal employers.

FEHB Brochures

31. **Question:** Will tribal employers have a different plan brochure?

Answer: No, tribal employers will have the same brochure as Federal employees. 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.

Training and Marketing to Tribal Employers

32. **Question:** What does OPM expect of carrier trainers?

Answer: Carrier trainers must explain FEHB for tribal employees and not market the carrier's own plan.

33. **Question:** Does OPM expect that carriers will conduct typical Open Season meetings, marketing activities, and health fairs?

Answer: Yes. Everything will be the same as it is for Federal employees.

34. **Question:** Will carriers be allowed to go on site to the individual tribal groups to conduct these activities?

Answer: Yes, tribal Open Season meetings, marketing activities, and health fairs will operate the same as Open Season meetings, marketing activities, and health fairs for Federal employees.

35. **Question:** If a tribal employer calls up a carrier and asks for plan information, such as brochures, marketing documents, and enrollment packets, what information can the carrier give?

Answer: The carrier can give the tribal employer the same information that it gives Federal agencies that ask for information, including brochures, marketing documents, enrollment packets, etc.

36. **Question:** If a tribal employer calls up a carrier and asks for copies of OPM materials (e.g., FEHB Guide for Tribal Employees, SF 2809, presentations), what should a carrier do?

Answer: The carrier should refer the tribal employer to OPM's Tribal Programs website at <http://www.opm.gov/insure/health/tribes/index.asp> and instruct the tribal employer to print its own copies.

37. **Question:** If a tribal employer calls up a carrier and asks to be trained about FEHB, what must the carrier do?

Answer: The carrier should inform the tribal employer that OPM is offering in-person training opportunities, informational teleconferences, and webcasts on YouTube (available at <http://www.youtube.com/playlist?list=PLE39C952DAD3C41FF&feature=plcp>) to train tribal employers about FEHB. In addition, tribal employers can call the OPM Tribal Desk at (202) 606-2530 or email at tribalprograms@opm.gov, Monday through Friday during normal business hours, to talk to OPM staff about FEHB for tribal employees. OPM will post a full listing of upcoming training opportunities at www.opm.gov/insure/health/tribes/index.asp soon.

The carrier should inform the tribal employer that, if the above training opportunities are not sufficient, the tribal employer should email OPM at tribalprograms@opm.gov to request additional training.

38. **Question:** If a tribal employer calls up a carrier and asks the carrier to attend a health fair, what can the carrier do?

Answer: The carrier can attend the health fair and distribute the same materials that it distributes at a Federal agency's health fair.

39. **Question:** If a tribal employer calls up a carrier and asks for copies of the carrier's brochure, what should the carrier do?

Answer: The carrier should remind the tribal employer that plan brochures are available on the plan's website and on OPM's website at <http://www.opm.gov/insure/health/planinfo/index.asp>. The carrier should inform the tribal employer that if it would prefer a paper brochure, the carrier can send a paper copy.

40. **Question:** Can a carrier contact a tribal employer that has signed an Agreement with OPM to participate in FEHB to provide that tribal employer with information about its FEHB plan?

Answer: Yes.

41. **Question:** Can a carrier cold call a tribal employer that has not signed an Agreement with OPM to market its FEHB plan?

Answer: No.

42. **Question:** Can a carrier respond to a tribal employer that has not signed an Agreement with OPM, but did contact the carrier for information about its FEHB plan?

Answer: Yes. The carrier may provide information about the FEHB plan.

43. **Question:** What if a tribal employer asks a question about FEHB that a carrier does not know the answer to?

Answer: The carrier should direct the tribal employer to the Tribal Programs webpage at www.opm.gov/tribalprograms and inform the tribal employer that OPM is posting webcasts on YouTube (available at <http://www.youtube.com/playlist?list=PLE39C952DAD3C41FF&feature=plcp>), which may answer the tribal employer's question. In addition, tribal employers can email the question to tribalprograms@opm.gov or call the OPM Tribal Desk at (202) 606-2530, Monday through Friday during normal business hours, to talk to OPM staff about FEHB for tribal employees.

44. **Question:** Can a carrier contact OPM through tribalprograms@opm.gov or the OPM Tribal Desk at (202) 606-2530?

Answer: No, OPM will not field carrier questions through these routes. Carriers must ask their contract specialist any questions about including tribal employees into the FEHB Program.

45. **Question:** How is OPM going to determine which carrier will go out and train a tribal employer that has expressed interest in additional training?

Answer: OPM is compiling a list of individuals who have completed OPM's carrier training and are willing to train.

OPM will inform tribal employers that, if the training opportunities offered by OPM do not answer all of their questions, OPM will offer additional training opportunities, including sending a carrier trainer out to train tribal employers at their work sites. If a tribal employer requests additional training, OPM will send a carrier, whose geographic preference matches the location of the tribal employer, to conduct training.

46. **Question:** When will OPM inform a carrier that it will be training a tribal employer?

Answer: Because tribal employers can join the FEHB Program on a rolling basis, we cannot say when you will be asked to train – or whether you will be asked to train at all. If OPM asks you to train a tribal employer, you will be given ample time to prepare. You will work with the tribal employer to determine a time and place to conduct the training session.

File Manager

47. **Question:** What is File Manager?

Answer: File Manager is a secure File Transfer Protocol (FTP) site that allows for the transfer of protected information between OPM and the FEHB Program carriers.

48. **Question:** Do FEHB carriers already use File Manager?

Answer: Yes, FEHB carriers already use File Manager for the disputed claims and brochure processes.

49. **Question:** How will File Manager be used for tribal enrollment into the FEHB Program?

Answer: File Manager will be used to notify carriers when a tribal employer is terminated from the FEHB Program for non-payment of premiums. OPM will send a listserv notifying the carriers that a tribal employer was terminated for non-payment of premiums. A list of the affected plan codes will be included. The affected plans will be instructed to log on to File Manager and download a Microsoft Excel spreadsheet that lists the enrollees in each plan by first name, last name, social security number, date of birth, and termination date.

File Manager may also be used to provide updated contact information of tribal employers.

50. **Question:** Why are FEHB carriers using File Manager for tribal enrollment?

Answer: Tribal employees who are terminated for non-payment of premiums are not eligible for Temporary Continuation of Coverage (TCC). File Manager is being used for the tribal enrollment as a means to provide (1) for notification outside of the SF 2810 process of a termination that does not provide for TCC and (2) a more efficient method in notifying carriers of a non-payment of premium.

51. **Question:** Will there be a separate File Manager group for Tribal FEHB?

Answer: Yes, the separate file manager group is called “[Plan Code] Tribal FEHB.”

52. **Question:** Is a separate User Identification (ID) and password required to access the Tribal FEHB File Manager Group?

Answer: If a plan representative already has an existing File Manager account, the representative will continue to use the same File Manager User ID and password as used in the past. The new “Tribal FEHB” group will be added to the representative’s existing account. If the plan representative does not currently have File Manager access, the plan must request one through the plan’s OPM contract specialist. OPM recommends that Plans assign at least two people to be given access to File Manager to have a back-up person.

53. **Question:** What if a carrier wants somebody other than the current plan representative to have access to the Tribal FEHB File Manager Group?

Answer: File Manager is accessed through a secure FTP website. To obtain a User ID and password email your OPM contract specialist and copy Demetria.Mozian@opm.gov with the following table filled out.

Plan Code	Plan Name	First Name	Last Name	Email address

54. **Question:** How can somebody other than the current plan representative learn more about File Manager?

Answer: A Microsoft PowerPoint Presentation on how to download files to File Manager will be provided to your Tribal FEHB plan contact.

55. **Question:** What are my next steps if I want somebody other than the current plan representative to have access to the Tribal FEHB File Manager Group?

Answer:

- a. Designate an individual as the Tribal FEHB plan contact for File Manager.
- b. Have the Tribal FEHB plan contact fill out the above table.
- c. Email the completed table to your contract specialist with a copy to Demetria.Mozian@opm.gov. OPM will acknowledge receipt of request and send the Tribal FEHB plan contact the Microsoft PowerPoint Presentation.
- d. OPM will send the Tribal FEHB plan contact the User ID and temporary password for the Tribal FEHB File Manager Group.

56. **Question:** What if I have any technical questions about File Manager?

Answer: If a carrier has technical questions about File Manager, please email Demetria.Mozian@opm.gov and copy your contract specialist.