U.S. Office of Personnel Management Healthcare and Insurance

FEHB Program Carrier Letter All FEHB Carriers

Letter No. 2015-14 Date: July 28, 2015

Fee-for-Service [11] Experience-rated HMO [11] Community-rated [12]

SUBJECT: Updated FEHB Guidance on Preventive Care

Purpose: This carrier letter updates OPM guidance on Preventive Care by identifying previous carrier letters that are now superseded by current law or medical evidence.

Background: Consistent with the Affordable Care Act (ACA), Federal Employees Health Benefits (FEHB) Program carriers are responsible for covering preventive services recommended with an "A" or "B" rating by the United States Preventive Services Task Force (USPSTF), as well as immunizations recommended by the Advisory Committee on Immunization Practices (ACIP), and Women's Health Services specified in guidelines issued by the Health Resources and Services Administration (HRSA). FEHB members must receive these services at no cost share.

Preventive care guidelines are updated periodically by the USPSTF, ACIP, and HRSA. Preventive services earning an "A" or "B" rating from the USPSTF before December 31 of any year should be incorporated into FEHB carrier benefit proposals the following May. The Department of Health and Human Services, with the Departments of Labor and Treasury, publish clarifications and Frequently Asked Questions at https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/. OPM expects FEHB carriers to follow this sub-regulatory guidance as it pertains to preventive service delivery.

We emphasize that USPSTF recommendations apply to <u>preventive care only</u>. There are other circumstances - such as providing diagnostic evaluations and monitoring ongoing conditions - for which tests like mammography, colonoscopy, or prostate specific antigen may be medically necessary and covered according to each plan's medical policy/procedure guidelines.

Carriers may also include additional preventive services in their annual benefit proposals, consistent with plan specific medical policies. In making such proposals, we urge carriers to be aware that when the USPSTF awards a "D" rating, it believes there is moderate or high certainty that the service has no net benefit or that the harms of providing it outweigh the benefits. Carriers may also elect to apply cost sharing to any additional preventive services.

Action: Previous OPM guidance on certain preventive services is now outdated. Carriers should ensure their coverage for the following preventive care and screenings adheres to current recommendations. Changes not already incorporated into 2016 benefits proposals must be made for 2017. Specifically:

¹ http://www.dol.gov/ebsa/faqs/faq-aca26.html

<u>Colorectal cancer screening:</u> Carriers should adhere to current USPSTF recommendations for colorectal cancer screening. Applicable provisions in Carrier Letter 1992-09 are superseded. *Note: Updates to the USPSTF recommendations are expected during 2015.*

<u>Prostate cancer screening</u>: Applicable provisions in Carrier Letter 1992-09 are cancelled. Currently, the USPSTF recommends against prostate specific antigen based screening for prostate cancer. As noted above, carriers may include preventive care benefits beyond those recommended by the USPSTF in accordance with each plan's medical policy.

<u>Breast Cancer screening</u>: Carriers should adhere to the 2002 USPSTF recommendations on mammography, rather than provisions in Carrier Letter 1997-07. *Note: USPSTF recommendations were updated in 2009, but not enforced.* ² USPSTF updates are expected in 2015.

<u>Immunizations</u>: Carriers should adhere to the ACIP recommendations on immunizations for adults and children, available at http://www.cdc.gov/vaccines/hcp/acip-recs/index.html Applicable provisions in Carrier Letter 1994-04 are superseded.

<u>Tobacco cessation</u>: OPM guidance appears in Carrier Letter 2010-06 and aligns with USPSTF recommendations on tobacco cessation issued in April 2009. Because OPM is strategically focused on reducing tobacco use, to the extent OPM guidance is more specific or detailed than the later recommendations by USPSTF, FEHB carriers should comply with our Carrier Letter. *Note: Updates to the USPSTF Guidance are expected in 2015*.

<u>Contraception</u>: Carriers should adhere to HRSA guidelines concerning contraceptive methods and counseling found at http://www.hrsa.gov/womensguidelines/ and FAQs at http://www.dol.gov/ebsa/faqs/faq-aca26.html Note: "As stated in Carrier Letter 2015-02, HMOs participating in the FEHB Program are no longer required to comply with benefit requirements for federally qualified Health Maintenance Organizations."

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Sincerely,

John O'Brien
Director
Healthcare and Insurance

² Under PHS Act section 2713(a)(5), the Task Force recommendations regarding breast cancer screening, mammography, and prevention issued in or around November of 2009 are not to be considered current recommendations on this subject for purposes of any law. For details, please see footnote 3 at https://federalregister.gov/a/2010-17242