



United States Office of Personnel Management  
Healthcare and Insurance

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## **Tribal Benefits Administration Letter**

**Number:** 26-603

**Date:** March 6, 2026

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### **Subject: Annual Review of FEHB Open Season Actions – Family Member Eligibility**

OPM has a longstanding commitment to the integrity of family member enrollment in the Federal Employees Health Benefits (FEHB) Program to ensure that the resources dedicated to this benefit program are fairly and appropriately allocated

This Tribal Benefits Administration Letter (TBAL) requires Tribal employers to conduct a Family Member Eligibility Review (FMER) to validate certain Open Season elections starting with the 2025 Open Season. The FMER requires a random sampling of FEHB Open Season elections of Self Plus One and Self and Family enrollment types. Each election included in the random sampling will be subject to verification of all family members under the enrollment. If ineligible family members are found, Tribal employers must follow instructions in [TBAL 21-601](#) for removing an ineligible family member.

#### **Prior Guidance**

Currently, [TBAL 21-602](#) directs Tribal employers to request and view proof of family member eligibility for a Tribal employee's Initial Opportunity to Enroll (IOE), and for all qualifying life event (QLE) actions. [TBAL 21-601](#) presents a process for a Tribal employer to implement when there are questions or concerns about a family member's eligibility for coverage under the Federal Employees Health Benefits (FEHB) Program.

However, neither TBAL requires Tribal employers or FEHB Carriers to verify family members added to FEHB enrollment elections from the annual Open Season.

## **Scope**

This TBAL requires Tribal employers to conduct a FMER of a random sample of processed Self Plus One and Self and Family Open Season elections. For the 2024 Open Season, Tribal employers will review a minimum of 10 percent of Self Plus One and Self and Family FEHB Open Season elections. Where feasible, Tribal employers should aim to exceed the 10 percent required random sample of these Open Season elections in 2025. Results of the review must be reported to OPM by July 31, 2026.

OPM will provide further guidance on verification of Open Season elections in subsequent years, including expectations for increasing the percentage of elections subject to verification. Furthermore, OPM plans to provide guidance to require all Tribal employees to provide eligibility documentation for family member changes during Open Season in subsequent years. Additionally, OPM will provide future guidance on requests for Tribal employers to verify potential instances of improper enrollment identified by OPM. Tribal employers that perform family member eligibility verification of 100 percent of their Open Season elections will not be required to perform this random sample review since full verification has already been done. However, these offices are still required to submit a report on the verification work performed during Open Season to OPM no later than the following July 31.

## **Educating Enrollees**

To ensure consistent messaging to enrollees and to ease the administrative burden associated with performing this annual review, OPM has created communication materials, which will be distributed initially with this TBAL, and made available on the OPM website. This messaging includes reminders to Tribal employees of the potential consequences (fines or imprisonment) of intentional false statements or willful misrepresentation leading to improper enrollment. See FMER TK Fact Sheet.

## **Sample Selection Methodology**

To ensure consistency of randomization and ease of sample selection, those reviewed will be randomly selected using either the rand() function in Excel or a similar

tool/method chosen by the Tribal employer. This technique will provide each person who made a Self Plus One or Self and Family Open Season election with an equal and fair chance of being selected for the review.

To assist Tribal employers, step-by-step instructions for using the Excel rand() function are provided in Attachment 1 to this TBAL.

### **Process for Removing Ineligible Family Members**

Please follow the instructions for removing ineligible family members from [TBAL 21-601](#), Federal Employees Health Benefits Program: Removal of Ineligible Family Members from Enrollments.

### **Reporting**

The results of the annual Open Season FMER must be reported to OPM by email to [cep@opm.gov](mailto:cep@opm.gov) and [tribalprograms@opm.gov](mailto:tribalprograms@opm.gov) no later than July 31<sup>st</sup> each year. The report must be formatted using the provided template (Attachment 2- FMER Results Report).

Thank you for your continued cooperation to enhance FEHB Program integrity. Any questions on this TBAL should be submitted to [cep@opm.gov](mailto:cep@opm.gov) and [tribalprograms@opm.gov](mailto:tribalprograms@opm.gov), with the subject “FMER”.

Sincerely,

Shane Stevens  
Associate Director  
Healthcare and Insurance  
U.S. Office of Personnel Management