



United States Office of Personnel Management
Healthcare and Insurance

Benefits Administration Letter

Number: 24-201

Date: April 17, 2024

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

The Federal Employees Health Benefits (FEHB) Program is highly valued by employees seeking to care for their families and agencies aiming to recruit and retain talent. OPM has a longstanding commitment to the integrity of family member enrollment in the FEHB Program to ensure that the resources dedicated to this benefit program are fairly and appropriately allocated.

This Benefits Administration Letter (BAL) requires [employing offices](#) to validate certain Open Season elections starting with the 2024 Open Season. The Family Member Eligibility Review (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, employing offices must follow instructions in [BAL 20-203](#) for removing an ineligible family member.

Prior Guidance

Currently, [BAL 21-202](#) directs employing offices to request and view proof of family member eligibility for an employee's Initial Opportunity to Enroll (IOE), and for all qualifying life event (QLE) actions. [BAL 20-203](#) presents a process for an employing office 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 BAL requires employing offices or carriers to verify family members added to FEHB enrollment elections from the annual Open Season.

Scope

This BAL requires employing offices to conduct a Family Member Eligibility Review (FMER) of a random sample of processed Self Plus One and Self and Family Open Season elections. For the 2024 Open Season, employing offices will review a minimum of 10 percent of Self Plus One and Self and Family FEHB Open Season elections. Where feasible, employing offices should aim to exceed the 10 percent floor in 2024. Results of the review must be reported to OPM by July 31, 2025.

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 federal employees to provide eligibility documentation for family member changes during Open Season in subsequent years. Additionally, OPM will provide guidance on requests for employing offices to verify potential instances of improper enrollment identified by OPM through analyses of its Master Enrollment Index (MEI).

Employing offices 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 BAL, and made available on the OPM website. This messaging includes reminders to 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 employing office. 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 employing offices, step-by-step instructions for using the Excel rand() function are provided in Attachment 1 to this BAL.

Process for Removing Ineligible Family Members

Please follow the instructions for removing ineligible family members from [BAL 20-203](#), 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 no later than July 31 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 BAL should be submitted to cep@opm.gov, with the subject "FMER."

Sincerely,

Laurie Bodenheimer
Associate Director
Healthcare & Insurance

Attachments:

Attachment 1 – How to Generate a Random Sample of Open Season Elections

Sample size

Each year employing offices will conduct a Family Member Eligibility Review (FMER) of a random sample of a minimum of 10% of their processed Self Plus One and Self and Family open season elections. The results of the review will be reported to HI-OPM no later than July 31st.

Sample Selection Methodology

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

The following are step-by-step instructions for generating a random sample of elections using Microsoft Excel:

1. Run a report of processed Self Plus One and Self and Family open season elections and output it into the attached Excel spreadsheet. Depending on your system's reporting capabilities, you may include additional data fields that will help you conduct the review. Fields should include:
 - a. Enrollee SSN
 - b. Enrollee Name (last, first)
 - c. Enrollee address
 - d. Enrollee email address
 - e. Enrollee phone number
 - f. Enrollment code
 - g. Family member information
 - a. Name
 - b. Relationship code
 - c. Address
 - d. Email
2. Add a new column to the left of Column A and name it Random Number
3. In the first row under the heading row, in the Random Number column, enter the formula =INT(RAND()*XX)
 - a. Replace the XX in the formula with the total number of elections in your report

- b. For example, if you had 500 elections, your formula would be =INT(RAND()*500)
4. Press enter and a random number will appear in the selected cell
5. Copy the formula in each cell in the Random Number column by clicking the small box at the bottom right corner of the cell and dragging the box down the column to the bottom of the list—this generates a new random number for each name on your list
6. Prevent the numbers from changing as you work with the table:
 - a. Highlight all random numbers in the Random Number column
 - b. Click Copy
 - c. Highlight the random numbers again and right-click on them
 - d. Click Paste Special
 - e. Click Paste Values
 - f. This removes the random function from the cells
7. Take a 10 percent random sample (or higher) from the list:
 - a. Highlight all the columns which contain data and numbers.
 - b. Click Home
 - c. Click Sort and Filter
 - d. Click Custom Sort
 - e. Sort by the column with the random numbers
 - f. Order smallest to largest
 - g. Click OK

Your list has now been randomly sorted, and you can select however many elections you need to reach the required percentage for the FMER. This simple method will provide a list of enrollees randomly selected for the review.