

PUBLIC SUBMISSION

As of: 10/9/24, 10:39 PM
Received: May 28, 2024
Status: Posted
Posted: June 12, 2024
Category: Agency
Tracking No. lwq-ftu9-qz7d
Comments Due: July 05, 2024
Submission Type: Web

Docket: OPM-2024-0011

Submission for Review: Revision and Consolidation of Two Existing Information Collections Related to Health Benefits Election Forms (3206-0160)

Comment On: OPM-2024-0011-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Health Benefits Election Forms

Document: OPM-2024-0011-0005

Comment from lynne bonia

Submitter Information

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General Comment

(1) Many employees have multiple dependents (4 or more) and although you are stating to use the new form Part C to "duplicate this page as needed for any additional family members", this will result in many more pages than you really need (family of 4 currently fits on one page). Multiple pages will result in faxing and document upload issues and a chance of missing dependents forms if the forms are not kept together. Also the Part C form does not have the employee information listed. How is this paper reduction? (2) The draft has a lot of wasted space. Can you condense?. (3) Can eOPF handle the new change? (4) Remember the agencies with automated systems - we are not using paper SF 2809s.

PUBLIC SUBMISSION

As of: 10/9/24, 10:38 PM
Received: May 28, 2024
Status: Posted
Posted: June 12, 2024
Category: Agency
Tracking No. lwq-d7oi-wzrx
Comments Due: July 05, 2024
Submission Type: Web

Docket: OPM-2024-0011

Submission for Review: Revision and Consolidation of Two Existing Information Collections Related to Health Benefits Election Forms (3206-0160)

Comment On: OPM-2024-0011-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Health Benefits Election Forms

Document: OPM-2024-0011-0004

Comment from USAF

Submitter Information

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Government Agency Type: Federal

Government Agency: USAF

General Comment

The draft SF 2809 says, "Your adult family member's contact information, if different from yours." There are employees that have young children that are theirs biologically that do not live with them. Based on what the form says, you would not enter the address where the minor child lives. The old SF 2809 allowed you to put an address in for all family members, if the address was different from the employee.

PUBLIC SUBMISSION

As of: 10/9/24, 10:38 PM
Received: July 02, 2024
Status: Posted
Posted: September 09, 2024
Category: Agency
Tracking No. ly4-k4hj-3gwb
Comments Due: July 05, 2024
Submission Type: Web

Docket: OPM-2024-0011

Submission for Review: Revision and Consolidation of Two Existing Information Collections Related to Health Benefits Election Forms (3206-0160)

Comment On: OPM-2024-0011-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Health Benefits Election Forms

Document: OPM-2024-0011-0010

Comment from DHS

Submitter Information

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Government Agency Type: Federal

Government Agency: DHS

General Comment

1. Add space for more than 2 family members and/or instructions for how to include more than 2 family members – info provided in the first paragraph of Part C
2. Add a “Type of Eligibility Document” check box or fill able section for each new family member to reenforce that the document is required and help support the audits
3. Event Codes 1A and 1B have been removed from the form, employees may no longer need to enter this code however Processing does which could cause issue in the future. Looks like all A/B codes have been removed?
4. What is needed to complete the form 3rd bullet point should read: Eligible family member’s Social Security number, date of birth, and eligibility documentation”
5. Part B item 2 Event code: provide option to click event code. You can restrict codes based on Part A Item 9 Enrollee Category (1 active employee participating in premium conversion; 2 active employee NOT participating in premium conversion; 3 former spouse under Spouse Equity; 4 TCC)
6. Code 4A has been removed from the form- This code is for TCC employees- Is this being replaced by the Part A Item 9 Enrollee Category?
7. Add a note that signature must be PIV certified or a wet signature – not all agencies require PIV signature
8. Regarding the "Caution" statement under each family member's enrollment information in PART C only (does not apply to the identical statement when it appears in Part A):

Is it possible to change the second sentence removing the word "you", and change it to "this family member". The second sentence could instead read: "If this family member is covered under another FEHB or PSHB plan, see the instructions for more information." I realize they just copied and pasted the same

Caution statement from PART A, but when they did that, they should have changed this statement slightly to tailor it to the information being provided in this section, which is the family member's, not the employee).

9. Page 7 - Additional Information

Effective Date: Most enrollments and changes of enrollment are effective on the first day of the pay period after the office maintaining your enrollment receives this form and that follows a pay period during any part of which you are in a pay status.

Could the following qualifier be added: first day of the pay period after the office maintaining your enrollment receives this form and all required eligibility documents.

Attachments

DHS-USCIS Input

PUBLIC SUBMISSION

As of: 10/9/24, 10:38 PM
Received: July 03, 2024
Status: Posted
Posted: September 09, 2024
Category: Agency
Tracking No. ly6-5e7i-pq0j
Comments Due: July 05, 2024
Submission Type: Web

Docket: OPM-2024-0011

Submission for Review: Revision and Consolidation of Two Existing Information Collections Related to Health Benefits Election Forms (3206-0160)

Comment On: OPM-2024-0011-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Health Benefits Election Forms

Document: OPM-2024-0011-0009

Comment from DOD

Submitter Information

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Government Agency Type: Federal

Government Agency: DOD

General Comment

Things we like about the draft SF-2809:

- It is shorter (only 13 pages)
- It leads off with the form and then follows with the instructions, and includes the Family Member Eligibility requirement AND proof documents
- QLEs are easier to read and seem to be grouped better

Things that concern us:

- There is only space for two family members. We realize it says to duplicate that page, but many employees have more than 2 dependents. Duplicating pages will result many more pages which could result in errors, faxing and/or document upload issues.
- While we like the QLE table being narrowed down, we are concerned not having the permissible changes on the chart will lead to confusion amongst employees about allowed actions for each QLE and create a burden for HR offices. Sure, you have linked the Table of Permissible Changes but if employees are manually completing the form, they will not be able to access the Table of Permissible changes. The way it is in the draft, it seems employees are able to make any change due to a QLE.
- The drop-down menus will not be functional if employees print and manually complete the form.
- The form being a significantly different layout than the current one, might be an issue for agencies using electronic systems to process FEHB enrollments. The reconfiguration required might be a pain point for agencies.

Suggestions:

- In Part B, the option to “Change Family Member on your Current Self + One plan” is bizarre. This

rarely happens and will confuse employees. Can you combine this and the next option (add a family member to current self + family) to “Add or Change family members to current plan.”

- Can you add an option to “Remove dependent or family members” with blank fields to be completed for current plan, and dependent name to be removed in part B? This would be easier for employees who may be removing just one dependent from a family plan and would help reduce paper. If not, then clarify in the instructions and/or on the form that not including dependent(s) on the forms will remove them from the enrollment.
- Insert a date field for Initial Opportunity to Enroll - this will help HR offices easily verify employees are within their 60-day enrollment window.
- Might consider adding a “eligibility documents verified” field in part E
- Add a reminder that enrollment for family member without required documents is not complete under the “effective date” section on page 7, Part C.

Questions:

- Will there be a grace period during which either the current or the new version of the 2809 can be used. Or will the old form be obsolete immediately?
- The draft indicates an October 2024 revision date to the SF2809, will agencies be required to use this form for open season enrollments?
- Which form (OPM-2809 or SF-2809) would be used for a newly retiring employee?
- The dependent page carries into the signature page; would employees enrolling more than 2 dependents be required to duplicate both pages and sign every duplicate page?
- A new 2809 to remove an ineligible family member. Does that include even if a child ages out at 26 (which is currently automatic, and a new form is only required if there is an enrollment change)?

PUBLIC SUBMISSION

As of: 10/9/24, 10:38 PM
Received: June 17, 2024
Status: Posted
Posted: June 18, 2024
Tracking No. lxj-d2zo-qi42
Comments Due: July 05, 2024
Submission Type: Web

Docket: OPM-2024-0011

Submission for Review: Revision and Consolidation of Two Existing Information Collections Related to Health Benefits Election Forms (3206-0160)

Comment On: OPM-2024-0011-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Health Benefits Election Forms

Document: OPM-2024-0011-0008

Comment from DOD

Submitter Information

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Government Agency Type: Federal

Government Agency: DOD

General Comment

The SF 2809 can be confusing due to its layout, not only to members filling out the form but system's folks. The form only has one page of 2 family members and says to duplicate for additional. However, the family member page overflows to the signature page, no single page to duplicate, this seems like a design flaw.

You must submit a new SF 2809 to remove any family member who becomes ineligible, didn't see an option for deleting family member.

Wouldn't you list the Table of Permissible Changes vs select few? The table wouldn't open in the draft.

If you are keeping the layout for the OPM 2809 similar to the older version of the SF 2809, not seeing the benefit in the new SF 2809.

When an employee is retiring, are you going to require they fill out the OPM 2809 to put in retirement package? Or continue using the RI 79.9 or will that form become obsolete?

PUBLIC SUBMISSION

As of: 10/9/24, 10:37 PM
Received: June 09, 2024
Status: Posted
Posted: June 12, 2024
Category: Agency
Tracking No. lx7-wxjp-7jgc
Comments Due: July 05, 2024
Submission Type: Web

Docket: OPM-2024-0011

Submission for Review: Revision and Consolidation of Two Existing Information Collections Related to Health Benefits Election Forms (3206-0160)

Comment On: OPM-2024-0011-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Health Benefits Election Forms

Document: OPM-2024-0011-0007

Comment from stephen Monarque

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General Comment

I support this proposed change as it will make OPM more efficient.

PUBLIC SUBMISSION

As of: 10/9/24, 10:37 PM
Received: May 29, 2024
Status: Posted
Posted: June 12, 2024
Category: Agency
Tracking No. lwr-xmr2-tcbp
Comments Due: July 05, 2024
Submission Type: Web

Docket: OPM-2024-0011

Submission for Review: Revision and Consolidation of Two Existing Information Collections Related to Health Benefits Election Forms (3206-0160)

Comment On: OPM-2024-0011-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Health Benefits Election Forms

Document: OPM-2024-0011-0006

Comment from USDA

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Government Agency Type: Federal

Government Agency: USDA

General Comment

For each family member listed there should be a box for each dependent for the employee to list the form(s) they are attaching to the SF 2809 to prove eligibility of dependent - A write/type in box. Many employee's don't read the directions, but will notice it if it is listed on the form to fill out. eOPF should contain a document name for FEHB Dependent Proof of Eligibility – this would make audits easier (search by form name), especially when employees change agencies.