



United States Office of Personnel Management
Retirement Services

Benefits Administration Letter

Number: 24-103

Date: October 4, 2024

Subject: Process Change for Retiring Employee Open Season Elections Effective After Retirement

This Benefits Administration Letter (BAL) outlines new procedures for when a retiring Federal employee makes an Open Season election that will be effective after their separation date from the agency for retirement. The implementation of these procedures will improve the retiring Federal employee experience by reducing potential delays in receiving their new health insurance identification cards from the health insurance Carrier due to a Federal Employees Health Benefits (FEHB) Open Season election becoming effective after retirement.

Background

Under the existing procedures, agencies submit an uncertified Open Season [SF 2809](#), *Health Benefits Election Form*, to OPM for employees who retire before the effective date of the FEHB Open Season election. Upon receipt of the retirement application package with a FEHB cover sheet and FEHB Open Season SF 2809, OPM would expedite the review and adjudication of the retirement case. However, there have been instances where a retirement application package with an FEHB Open Season election would be submitted late by an agency or require additional information by OPM before it could be processed. As a result of these delays, it could take several months for the retiring employee's new FEHB coverage to be processed by the health insurance Carrier and for the annuitant to receive their new health insurance identification cards.

Who is Impacted

This new process will impact **retiring Federal employees** who submit an Open Season FEHB election that will become effective **after** their retirement date.

Note: The FEHB Open Season effective dates are different for Federal employees and annuitants. A Federal employee's FEHB Open Season election is processed effective the first day of the first full pay period that begins **on or after** January 1. An annuitant's FEHB Open Season election becomes effective **on** January 1. For instructions and guidance on Open Season effective dates, please review the [Federal Benefits Open Season Manual](#).

Federal employees who retire in the months of October and November should be counseled about their opportunity to make an FEHB Open Season election since Open Season will occur while their retirement is still in process with the agency and OPM. These retiring employees may include an FEHB Open Season election in their retirement application package using the new procedure.

This process does not affect U.S. Postal Service (USPS) employees, annuitants, or compensationers subject to Postal Service Health Benefits (PSHB) coverage. For general information on PSHB coverage, please visit the [OPM PSHB Program page](#).

What is Changing

Under the new process, agencies will submit a **certified** Open Season SF 2809 to the health insurance Carrier with remarks about the employee's retirement. The agency certified Open Season SF 2809 and *FEHB Enrollment Change Cover Sheet* (Attachment 1) will be placed on top of the final retirement application package submitted to OPM to flag the FEHB Open Season change action.

Agencies will no longer send an **uncertified** [SF 2809](#), *Health Benefits Election Form*, to OPM in the retirement application package as previously instructed.

New Procedure

Retiring employees who want to make an FEHB Open Season election that will be effective **after** their retirement date will need to complete a paper [SF 2809](#), *Health Benefits Election Form*. The agency Human Resources Office will need to advise the retiring employee of the paper process. Retiring employees should **not** submit an FEHB Open Season enrollment change through the agency's electronic enrollment system (i.e., Employee Express, myPay, Employee Personnel Page, etc.).

The FEHB coverage and enrollment change conversation should be occurring during the agency's retirement counseling session with the retiring employee to ensure they are following the correct process.

Determining Effective Date

For an FEHB Open Season election that will be effective **after** an employee's retirement date, the agency Human Resources Office will need to certify the FEHB Open Season SF 2809 with the following effective date:

- Retirements **prior to January 1** will have an effective date of 01/01/20XX.
 - **Example** – if an employee retires on November 30, 2024, then the Open Season election would be effective 01/01/2025.
- Retirements **on January 1 through the day before the employee Open Season effective date for that calendar year** will be effective on the annuity commencement date.
 - **Example 1** – if a Civil Service Retirement System (CSRS) employee voluntarily retires effective January 3, 2024, then the Open Season election would be effective 01/04/2024.
 - **Example 2** – if an employee involuntarily separates and retires under a discontinued service retirement effective January 12, 2024, then the Open Season election would be effective 01/13/2024 since the annuity will commence the day after separation. (In 2024, an employee Open Season election was effective on 01/14/2024.)

Certification of Retiring Employee's Open Season SF 2809

When completing the agency certification portion of the retiring employee's FEHB Open Season SF 2809, the agency Human Resources Office will need to:

1. Add the following information to the Remarks section–
 - *Retirement effective date: mm/dd/yyyy*
 - *Coverage will be transferred-in under OPM's payroll office number (2490-0002)*
2. Enter the date the completed SF 2809 was received from the retiring employee (even if it was before the Open Season enrollment period).
3. Enter the proper Open Season election effective date based on the retirement type and date of retirement.
4. Input the agency's contact information and sign as the certifying official.

Note: Do **not** enter the Open Season election into the agency's electronic enrollment system (i.e., Employee Express, myPay, Employee Personnel Page, etc.).

Transmission to the Carrier

Once the retiring employee's FEHB Open Season SF 2809 is certified, the agency Human Resources Office will need to send the certified form to the health insurance Carrier(s) via email or fax for processing (since these elections cannot be transmitted through an electronic enrollment system). In accordance with standard procedures, if a retiring employee is changing health insurance Carriers (e.g., enrollment change from BCBS to GEHA), then the FEHB Open Season SF 2809 will need to be sent to both the old Carrier (e.g., BCBS) and the new Carrier (e.g., GEHA).

If a retiring employee submits an FEHB Open Season SF 2809 prior to the beginning of the Open Season enrollment period (e.g., October retirement), then the agency will need to delay submission of the SF 2809 to the Carrier until after Open Season begins.

Submission to Payroll and OPM

The *FEHB Enrollment Change Cover Sheet* (Attachment 1) and agency certified FEHB Open Season SF 2809 will need to be placed on the top of the final retirement application package to flag that an Open Season election is in the package and the

enrollment change needs to be processed by OPM. There will be no change in the Payroll Office procedures upon receipt of the retirement application package from the agency Human Resources Office. **The final Individual Retirement Record (IRR) and Data Exchange Gateway (DEG) record prepared by the Payroll Office will reflect the old FEHB enrollment code.**

Note: Do **not** process a retiring employee's FEHB Open Season change in the agency's personnel and payroll systems if the effective date of the Open Season election is **after** the employee's separation from the agency rolls for retirement.

The Payroll Office will submit the DEG data and final retirement application package to OPM with the agency certified FEHB Open Season SF 2809 and *FEHB Enrollment Change Cover Sheet* (Attachment 1) on top. Upon receipt, OPM will flag these cases for expedited processing to ensure the new FEHB enrollment code is processed within the OPM system.

Note: Expedited processing of a retirement case with an Open Season election still requires the application package to go through the full adjudication process. Therefore, delays may occur for cases involving court orders or due to missing, inaccurate, or incomplete items in the retirement application package.

Uncommon Retirement Situations

Withdrawn Retirement Package

When a retiring employee timely withdraws their retirement application, the agency Human Resources Office will need to void the FEHB Open Season SF 2809 with the 01/01/20XX effective date and send a new certified FEHB Open Season SF 2809 with a revised effective date (first day of the first pay period in January) since they will remain an active Federal employee. Voided and newly certified FEHB Open Season SF 2809s will need to be sent to both the old and new health insurance Carriers.

Multiple Open Season SF 2809s from Retiring Employee

Agency Human Resources Offices will need to ensure that the most recent, valid FEHB Open Season SF 2809 received from the retiring employee is certified and sent to the old and new health insurance Carriers. They will also need to ensure that the correct SF 2809 is included in the final retirement application package submitted to OPM.

Death of an Annuitant Prior to Final Adjudication

The process does not change for a retiring employee who has separated from the agency rolls and dies before their annuity is adjudicated or before the effective date of their FEHB Open Season election.

Reemployed Annuitants

If a retiring employee is immediately reemployed after retirement with no break in service, then the agency will need to take specific actions concerning an FEHB Open Season election depending on the reemployment agency (same or different) and appointment date. The appointment must provide FEHB benefits for premiums to be withheld from their salary on a pre-tax basis under Premium Conversion. Premium Conversion is automatic for a reemployed annuitant unless they waive the pre-tax benefit to have the FEHB premiums withheld from their annuity.

For instructions and guidance on requirements for reemployed annuitants, please review [BAL 23-103](#), *Additional Guidance on Sending Reemployed Annuitant Information to the Reemployed Annuitant Inbox*, and [BAL 19-107](#), *Process Change for Handling Reemployed Annuitants*.

Reemployed in the Same Agency

These annuitants retire from an agency and are immediately reappointed as a reemployed annuitant in that same agency (e.g., DHS to DHS).

If **appointed at the same agency** as a reemployed annuitant **before January 1** –

- The FEHB Open Season SF 2809 will be processed at the beginning of a pay period as an active Federal employee unless they waive Premium Conversion. A copy of the agency certified FEHB Open Season SF 2809 will need to be submitted to the OPM Reemployed Annuitant inbox with the official reemployment notice.
- If the reemployed annuitant waives Premium Conversion, then the FEHB Open Season SF 2809 will be handled following the “New Procedure” in this BAL with a 01/01/20XX effective date and premiums will be withheld from their monthly

annuity. A copy of the Premium Conversion Waiver election will need to be submitted to OPM through the Reemployed Annuitant inbox.

If appointed at the same agency as a reemployed annuitant **on or after January 1** –

- Process the FEHB Open Season SF 2809 using the “New Procedure” in this BAL.
- The agency will prepare a transfer-in [SF 2810](#), *Notice of Change in Health Benefits Enrollment*, effective the appointment date.
- The FEHB Open Season SF 2809 will need to be sent to the health insurance Carrier **before** the transfer-in SF 2810 to document their reemployment.
- A copy of the transfer-in SF 2810 will need to be submitted to the OPM Reemployed Annuitant inbox with the official reemployment notice.
- If the annuitant waives Premium Conversion, a copy of the waiver election will need to be submitted to the OPM Reemployment Annuitant inbox with the official reemployment notice.

Reemployed in a Different Agency

These annuitants retire from an agency and are immediately reappointed as a reemployed annuitant in a different agency (e.g., DoD to VA). Since these cases involve two different agencies, careful coordination and open communication channels between the losing agency and gaining agency is essential.

If appointed at a different agency as a reemployed annuitant **before January 1** –

- The FEHB Open Season SF 2809 will be processed at the beginning of the pay period as an active Federal employee unless they waive Premium Conversion.
 - If the losing agency already sent the certified FEHB Open Season SF 2809 to the health insurance Carrier, then the losing agency will need to void the FEHB Open Season SF 2809 upon being contacted by the gaining agency. The gaining agency will then need to:

- Complete a transfer-in SF 2810 for the current FEHB enrollment code effective on the appointment date as a reemployed annuitant, **and**
 - Send a new certified FEHB Open Season SF 2809 to the health insurance Carrier(s) effective at the beginning of the pay period as an active Federal employee.
- The gaining agency will submit a copy of the transfer-in SF 2810 to the OPM Reemployed Annuitant inbox with the official reemployment notice.
 - If the reemployed annuitant waives Premium Conversion, then the FEHB Open Season SF 2809 will be handled following the “New Procedure” in this BAL with 01/01/20XX effective date and premiums will be withheld from their monthly annuity. The gaining agency will need to provide a copy of the Premium Conversion Waiver election to OPM through the Reemployed Annuitant inbox.

If appointed at a different agency as a reemployed annuitant on or after January 1 –

- The losing agency will process the FEHB Open Season SF 2809 using the “New Procedure” in this BAL.
- The gaining agency will prepare a transfer-in SF 2810 effective the appointment date using the new FEHB Open Season enrollment code.
- The FEHB Open Season SF 2809 will need to be sent to the health insurance Carrier by the losing agency **before** the transfer-in SF 2810 is sent to the health insurance Carrier by the gaining agency.
- The gaining agency will need to submit a copy of the transfer-in SF 2810 to the OPM Reemployed Annuitant inbox with the official reemployment notice.
- If the annuitant waives Premium Conversion, then the gaining agency will need to submit a copy of the waiver election to the OPM Reemployment Annuitant inbox with the official reemployment notice.

Additional Information

For questions regarding the information in this BAL, please contact the Benefits Officers Development and Outreach group at benefits@opm.gov or call (202) 606-0788.

Sincerely,

Margaret Pearson
Associate Director
Retirement Services

Encl.:

Attachment 1 – FEHB Enrollment Change Cover Sheet

Attachment 2 – Instructions for FEHB Enrollment Change Cover Sheet and Assembling Retirement Application Packages