



United States Office of Personnel Management  
Healthcare and Insurance

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## Benefits Administration Letter

**Number:** 24-204

**Date:** November 20, 2024

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### **Subject: Annual Family Member Eligibility Verification Tasks**

This Benefits Administration Letter (BAL) sets forth annual tasks that employing offices must perform for purposes of family member eligibility verification (FMEV). This BAL supplements and updates the guidance in [BAL 24-201](#) specifically, as explained below. This requirement begins the for the **2024 Open Season for 2025 plan year enrollments**:

1. There are new reporting requirements to capture data about FMEV during the Initial Opportunity to Enroll (IOE) and Qualifying Life Events (QLE).
2. To reflect the addition of IOE and QLE reporting, OPM is updating the report introduced in [BAL 24-201](#) (please see Attachment 2). Its name has been changed to the Family Member Eligibility Verification (FMEV) Annual Report, because it includes tasks related to family member eligibility verification under all enrollment circumstances beyond just the sampling of Open Season actions.

Employing offices will need to provide only one report on family member eligibility verification for each plan year. This report will include both the FMEV for Open Season actions and reporting for IOE and QLE changes made outside of an open season. This is intended to reduce the burden on employing offices throughout the year.

### **FMEV Reporting for IOE and QLEs**

On April 15, 2021, [BAL 21-202](#) directed [employing offices](#) to request and view proof of family member eligibility for an employee's IOE and for all QLE actions. OPM also

issued a data call in February 2022 and in April 2024 to monitor compliance and results of the process established under [BAL 21-202](#). The data call was comprised of nine questions, which provided OPM with important feedback on the process of verifying family member eligibility and which types of family members are most likely to remain enrolled in FEHB once they are no longer eligible.

This BAL outlines a new requirement for employing offices to report on verification of family member eligibility for the IOE and QLEs throughout each plan year. The format will be the same as that used for the FMEV reporting for Open Season and is included as a worksheet tab on the revised Attachment 2. This report will contain information for the plan year. The first IOE and QLE report will be for the 2025 plan year and is due on or before July 31, 2026. It must be submitted on Attachment 2 at the same time each year as the Open Season FMEV report. The completed attachment must be sent to OPM by email to [cep@opm.gov](mailto:cep@opm.gov) by July 31 of each year.

### **FMEV Reporting for Open Season**

Starting with the 2024 Open Season for 2025 plan year enrollments, employing offices are required to validate a random sampling of FEHB elections of Self Plus One and Self and Family enrollment types. Guidance on generating a random sample can be found in Attachment 1 of both this BAL and [BAL 24-201](#). 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. For 2025, the minimum required random sample size is 10 percent of all elections resulting in greater than a Self Only enrollment. OPM expects the percentage of elections randomly selected for verification will be subject to increase over the next few years.

If an enrollee is selected for the annual FMEV all family members will need to be verified. However, if the enrollee has already provided documentation deemed acceptable as proof of eligibility for a family member during the plan year prior to this request, no additional documentation will be required for that family member. For example, if an enrollee adds a new child during the previous year's Open Season or later, no documentation will be needed for that child or any other family member for whom documentation was provided at that time. This aligns with the requirements of

[BAL 21-202](#), which requires documents only for family members that have not previously been verified. However, the FMEV will require verification if more than one year has passed since documentation has been presented for a family member.

Employees subject to be included in the random sample include any currently enrolled or non-enrolled employee that makes an Open Season election resulting in a Self Plus One or Self & Family enrollment. This includes employees that are either enrolling for the first time, or current employees who may be changing their enrollment type. It also includes any Open Season transaction, whether they are simply switching carriers or they are adding family members.

If an employee is retiring during the first half of the year, please remove that employee from the sample and randomly select another appropriate employee.

All results of the FMEV sampling and agency review must be reported to OPM using the revised form (Attachment 2 to this BAL). Reports should be completed by Cabinet-level Departments, independent agencies, and other employing agencies that have FEHB-eligible employees (including Congress, the courts, and tribal employers); and sent to OPM by their Agency Benefits Officer (ABO) by July 31, 2025, and by July 31 of each following year. Cabinet departments may have their sub-agencies and offices prepare a report and submit to the ABO with enough time to allow the Cabinet department's ABO to compile one complete report.

## **Reporting**

As noted above, the results of both the annual Open Season and the IOE and QLE Actions annual FMEV reports must be completed using Attachment 2 – Family Member Eligibility Verification Annual Report of this BAL which revises and replaces BAL 24-201 Attachment 2 – Family Member Eligibility Review Report. The revised form adds a new tab for the report which addresses IOE and QLEs. FMEV tabs address only Open Season Actions, with a tab for agencies reporting on a random sample of 10 percent or greater and a tab for those agencies that perform 100 percent verification annually.

Once completed, Cabinet-level Departments and independent agencies must submit their reports to OPM by email to [cep@opm.gov](mailto:cep@opm.gov) no later than July 31 each year starting in 2025.

Thank you for your continued cooperation to enhance program integrity. Any questions on this BAL should be submitted to [cep@opm.gov](mailto:cep@opm.gov), with the subject “FMEV reporting”

Sincerely,

Laurie Bodenheimer  
Associate Director  
Healthcare and Insurance

Attached:

Attachment 1 – How to Generate a Random Sample

Attachment 2 – FMEV Annual Report