



United States Office of Personnel Management
Retirement Services

Benefits Administration Letter

Number: 25-102

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Subject: FEHB Enrollment Coordination for Married Federal Employees and Annuitants

This Benefits Administration Letter (BAL) is to advise agencies on how to cancel an annuitant's Federal Employees Health Benefits (FEHB) enrollment when they are covered by their federally employed spouse's FEHB enrollment. For an annuitant to maintain FEHB reenrollment eligibility, the federally employed spouse must elect a Self Plus One or Self and Family enrollment type and cover the annuitant as a family member. The purpose of this FEHB enrollment switch from one spouse to another is typically to take advantage of the FEHB pre-tax premium conversion benefits.

*For the purpose of this BAL:

- The term "annuitant" refers to a retiring employee and retired employee.
- The term "spouse" refers to a federally employed spouse who will remain actively employed to enroll in FEHB coverage for the family.

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](#).

RI 79-9, Health Benefits Cancellation/Suspension Confirmation

The form and process to cancel or suspend FEHB enrollment for an annuitant (see the FEHB Handbook – [Annuitants](#)) is different than the form and process to cancel

enrollment for an active employee (see the FEHB Handbook – [Termination, Conversion, and Temporary Continuation of Coverage](#)). An annuitant should **not** complete the SF 2809, *Health Benefits Election Form*, to cancel or suspend their FEHB enrollment after their retirement starts.

An annuitant may cancel or suspend their FEHB enrollment and maintain reenrollment eligibility for one of the following reasons:

1. Coverage under a family member's FEHB enrollment (cancellation);
2. Enrollment in a [Medicare Advantage](#) health plan (suspension);
3. Enrollment in TRICARE, TRICARE for Life, Peace Corps, or CHAMPVA (suspension); or
4. Eligibility for coverage under Medicaid or a similar state-sponsored program or medical assistance for the needy (suspension).

An annuitant must prepare the following documents to cancel or suspend their FEHB enrollment:

1. Complete the [RI 79-9](#), *Health Benefits Cancellation/Suspension Confirmation*, **and**
2. Include supporting documentation proving their health insurance coverage under one of the permissible situations outlined on the RI 79-9 form.

Generally, an annuitant's FEHB enrollment cancellation or suspension is effective the first day of the month after the Office of Personnel Management (OPM) receives the signed RI 79-9 and supporting documentation. Annuitants must read the RI 79-9 carefully to ensure they are providing all required supporting documentation based on their situation.

FEHB Enrollment Coordination for Married Federal Employees at Retirement

Married Federal employees will often retire at different times and want to take advantage of the pre-tax premium conversion benefits through the spouse who will remain an active Federal employee. In some cases, married Federal employees may choose to switch the FEHB enrollment to the spouse who will remain federally

employed during an Open Season that takes effect several months or even a year before the retiring spouse's separation date for retirement. These Open Season FEHB enrollment changes typically do not require any special coordination by agencies since both spouses are still active employees and the Open Season FEHB enrollment effective dates for active employees are generally the same.

However, when married Federal employees want to make changes in their FEHB enrollments in conjunction with one spouse's retirement, the agency Human Resources office must carefully coordinate the effective dates of the FEHB elections to ensure there is no unintended gap in coverage. The most common occurrence for this type of situation is during Open Season when separate elections are made by a spouse (to enroll or increase enrollment type) and an annuitant (retiring employee) who is separating for retirement (to cancel enrollment). The effective dates for each of these FEHB elections will usually be different. The annuitant's (retiring employee's) Open Season election will become effective ***after*** their retirement date if they separate prior to the Open Season effective date for active employees, and they will be subject to annuitant Open Season effective dates. Active employee Open Season elections are effective at the beginning of the first pay period in January. The difference in these effective dates will result in a gap in coverage which means two Open Season elections should not be made by married Federal employees when one is retiring.

When an annuitant chooses to be covered as a family member on their spouse's FEHB enrollment, the annuitant will need to complete the RI 79-9 and obtain a copy of their spouse's agency certified [SF 2809](#). The spouse's SF 2809 must include the following information and list the annuitant as a covered family member on a Self Plus One or Self and Family FEHB enrollment:

- Annuitant's full name
- Spousal relationship code (a spouse is code "01")
- FEHB enrollment code (all three digits)
- Event code
- Enrollment effective date

The RI 79-9 and spouse's agency certified SF 2809 are then submitted to OPM, as either part of the retirement application package with the cover sheet found in [BAL 24-103](#),

[Attachment 1](#) or through a direct submission by the annuitant, for processing. These documents instruct OPM to cancel the annuitant's FEHB enrollment while preserving their right to later reinstate their FEHB enrollment with their annuity because they have been a covered family member on their spouse's FEHB enrollment. The effective date of the annuitant's FEHB cancellation is based on the FEHB enrollment effective date listed on the spouse's agency certified SF 2809.

When married Federal employees are employed by different agencies, the agency Human Resources offices are required to assist in coordinating this enrollment change process. Although the annuitant may communicate the requirement of an agency certified SF 2809 to their spouse, obtaining an agency certified SF 2809 containing the necessary information often requires assistance from the spouse's agency Human Resources office.

The agency Human Resources office should advise the annuitant to maintain copies of the FEHB cancellation documents submitted to OPM and review their annuity statements once their retirement case is finalized.

FEHB Enrollment Coordination Examples

The following five scenarios cover real-life situations that have occurred for married Federal employees. All FEHB coordination situations require thorough examination of each spouse's status (e.g., employed, retired), the desired enrollment change, and the enrollment change effective dates for each individual.

Scenario 1: FEHB cancellation submitted to agency prior to retirement

Hugo and Jane are Federal employees at two different Federal agencies. They are both enrolled in Self Only FEHB enrollments and want to move to a Self Plus One enrollment when Hugo retires at the end of December. Jane plans to make an Open Season election to switch from Self Only to Self Plus One through her agency's electronic enrollment system. What actions need to occur?

In this scenario, Hugo will need to complete the RI 79-9 and obtain a copy of Jane's agency certified SF 2809, then provide both documents to his agency Human Resources office for inclusion in his final retirement application package. Jane should be advised to print the receipt or enrollment confirmation while submitting her Open Season

election in the agency's electronic enrollment system to provide Hugo for inclusion in his retirement application.

Hugo's agency will need to place the cover sheet found in [BAL 24-103, Attachment 1](#) on top of the RI 79-9 and Jane's agency certified SF 2809 and include these documents in the final retirement application package sent to OPM. If all required FEHB documents are included in the retirement application package, then OPM will process Hugo's FEHB cancellation based on the effective date listed on Jane's agency certified SF 2809.

Note 1: Incomplete cancellation elections will experience a processing delay which will resolve upon final adjudication of the retirement case if the missing information or documentation is received timely. The annuitant's FEHB cancellation will be effective retroactively based on the spouse's agency certified SF 2809 effective date to ensure there is no gap in health insurance coverage.

Note 2: When an annuitant (retiring employee) is married to an active Federal employee and they want to switch the FEHB enrollment to their spouse, they must be experiencing a qualifying life event (QLE) or making a change during the annual Open Season. Unless the QLE or Open Season elections for both married employees would be effective prior to the annuitant's (retiring employee's) separation date, the agency Human Resources office should advise the annuitant to continue their FEHB and elect to cancel their FEHB enrollment **after** retirement through OPM using the RI 79-9.

Scenario 2: FEHB cancellation submitted to agency after retirement

Oscar is retiring from Federal service on May 31. His spouse, Farah, will continue to be a Federal employee for another couple of years. Oscar currently maintains the FEHB enrollment for the family (Self and Family) and their youngest child will turn 26 on June 2. Farah will make a QLE FEHB election in late May to enroll in a Self Plus One FEHB plan for her and Oscar. Farah receives a copy of the agency certified SF 2809 in mid-June after Oscar retired. Oscar provides his signed RI 79-9 and a copy of Farah's agency certified SF 2809 to his prior agency. What should the agency do?

If Oscar's former agency already sent his retirement application package to the agency's payroll provider, they will need to verify the status of the package. If the package has not yet been sent to OPM, then the agency will need to coordinate with the

payroll provider to add the RI 79-9 and Farah's agency certified SF 2809 to the retirement application package. The agency Human Resources office will need to use the best method available so the FEHB documentation can be included in the final retirement application package with the cover sheet found in [BAL 24-103, Attachment 1](#) prior to submission to OPM.

If all required information is included in the final retirement application package sent from the payroll provider to OPM, then Oscar's FEHB cancellation will be processed with his retirement. The effective date of his FEHB cancellation is coordinated using the effective date on Farah's agency certified SF 2809.

If Oscar's retirement application package was already sent to OPM when he provides the documents to his agency, then he will need to prepare the RI 79-9 as an annuitant and send it directly to OPM for processing (see Scenario 3 below). He will need to include his Civil Service Active (CSA) claim number on the RI 79-9, which he will receive from OPM via postal mail.

Scenario 3: FEHB cancellation submitted to OPM after retirement

Diane retired from Federal service in July while her spouse, Richard, continues to work as a Federal employee. OPM finalized Diane's retirement in November and she is currently enrolled in Self and Family FEHB coverage with premiums being deducted from her annuity. They have decided to switch the family's FEHB enrollment from Diane to Richard during the next Open Season to take advantage of the pre-tax premium conversion benefits. What steps to do they need to follow?

First, Richard will need to make an Open Season election to enroll in a Self and Family plan through his agency and obtain a copy of his agency certified SF 2809. Diane will need to complete a RI 79-9 to cancel her FEHB enrollment since she will become a covered family member under Richard's Self and Family FEHB enrollment.

Diane will fill out the RI 79-9 and make sure to include her Civil Service Active (CSA) claim number at the top of the form. The completed RI 79-9 and a copy of Richard's agency certified SF 2809 will need to be sent to OPM. The annuitant will need to follow the submission directions provided by OPM or they can mail it directly to the [OPM Retirement Operations Center](#). When OPM receives all the required documents,

Diane's FEHB cancellation election will be processed using the FEHB enrollment effective date listed on Richard's agency certified SF 2809.

Scenario 4: Married employee and annuitant want two Self Only plans – Employee enrolled in Self and Family plan

Liam is a Federal employee and maintains the Self Plus One FEHB coverage for his family. His spouse, Lindsay, retired from Federal service over a year ago (on an immediate annuity) and is a covered family member under Liam's FEHB enrollment. Lindsay has been a covered family member under Liam's Self Plus One FEHB plan for the last ten years. They now want to change from a Self Plus One plan to two Self Only plans during the next Open Season. What steps do they need to take to ensure there is no gap in coverage?

Before any health insurance changes are made, they must first confirm that Lindsay is eligible to reenroll in FEHB as an annuitant. Lindsay meets the eligibility requirements to continue health benefits coverage in retirement because she has been continuously covered as a family member under a FEHB plan for at least the 5 years of service immediately before her retirement date and this FEHB coverage as a family member continued into retirement without interruption.

Liam will need to make the initial FEHB enrollment change by making an Open Season election to change his enrollment from Self Plus One to Self Only. He will need to obtain a copy of the agency certified SF 2809 or print out confirmation of this Open Season change for Lindsay to include as supporting documentation in her FEHB enrollment change request as an annuitant.

After Liam completes his Open Season election, Lindsay will need to prepare a qualifying life event (QLE) FEHB enrollment change by completing a paper [OPM Form 2809](#) to elect a Self Only plan. The event code for this QLE change is "2F" due to loss of FEHB coverage as an annuitant. Lindsay will need to mail the completed OPM Form 2809 and Liam's agency certified SF 2809 (or Open Season enrollment change confirmation) to the [OPM Retirement Operations Center](#).

Most QLE FEHB enrollment changes for annuitants are processed effective the first day of the month after the OPM Form 2809 and supporting documentation are received. The FEHB change may be submitted 31 days before and up to 60 days after the QLE. To

ensure the QLE FEHB enrollment change for Lindsay is processed effective January 1, she will need to send the OPM Form 2809 and supporting documentation to OPM in November or early December.

Note 1: The [OPM Form 2809](#) is different from the [SF 2809](#). OPM Form 2809 is used exclusively by annuitants and former spouses.

Note 2: An annuitant receiving a deferred annuity is not eligible to reenroll or continue FEHB coverage through their annuity. Additionally, if the annuitant did not meet the 5-year coverage requirement at separation (for an immediate or postponed retirement), then the annuitant is not eligible to enroll in FEHB through their annuity.

Scenario 5: Married employee and annuitant want two Self Only plans – Annuitant enrolled in Self and Family plan

Ted retired from Federal service two years ago and maintains the Self and Family FEHB enrollment for his family. His spouse, Alexis, is still a Federal employee. Their youngest child no longer needs FEHB coverage, so they want to switch from a Self and Family FEHB plan to two Self Only FEHB plans during the next Open Season. What steps do they need to take to ensure there is no gap in coverage?

In this scenario, the annuitant is maintaining the Self and Family FEHB enrollment. In general, annuitants may decrease their enrollment at any time, and these changes are effective at the beginning of the month after the request is received. They do not have to wait until Open Season to change from a Self and Family plan to a Self Plus One or Self Only plan. However, it can be easier to process the federally employed spouse's enrollment change first and then make the subsequent FEHB enrollment change for the annuitant with OPM to ensure there is no gap in coverage for the federally employed spouse.

To initiate these enrollment changes, Alexis would make an FEHB Open Season election with her agency to enroll in a Self Only plan. As an active Federal employee, her election will be effective on the first day of the first full pay period in January.

Ted **will not** make an Open Season election, since annuitant Open Season elections are effective on January 1, which would result in a gap in Alexis' coverage. Instead, he will submit a QLE request to change his FEHB enrollment from a Self and Family plan to a

Self Only plan in coordination with his spouse's Open Season FEHB enrollment. The QLE request will need to include an OPM Form 2809 or a letter detailing the change he wants to make to his FEHB enrollment and the desired effective date.

In this scenario, an effective date of February 1 would ensure that Alexis doesn't lose health insurance coverage as a family member before her Open Season enrollment becomes effective. FEHB regulations permit short periods of dual enrollment in situations where one family member would otherwise not have coverage.

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,

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