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# FEHB Program Carrier Letter

## All Carriers

U.S. Office of Personnel Management  
Insurance Services Program

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**Letter No. 2003-34**

**Date:** December 10, 2003

Fee-for-service [ 33 ]    Experience-rated HMO [ 33 ]    Community-rated HMO [ 31 ]

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**SUBJECT:    Using the FEHB Disenrollment Regulations on CLER Discrepancies;  
                  Pseudo Social Security Numbers**

### **Disenrolling FEHB Enrollees with ‘160’ Error Codes**

In carrier letter 2002-20, dated May 28, 2002, we asked you to not employ the Federal Employees Health Benefits (FEHB) Disenrollment Regulations on FEHB enrollees solely because their names are on a discrepancy listing generated by the FEHB Enrollment Reconciliation Clearinghouse, also known as CLER. Because CLER has now been operational for over one year, we believe it is time to allow our carriers to employ the FEHB Disenrollment Regulations on your CLER ‘160’ error records. [A ‘160’ error is when a carrier reports an enrollment but no Federal agency reports that enrollment.] Do not use the disenrollment procedures on annuitants, as discussed below. Also, do not use the disenrollment procedures for any CLER error code record other than the ‘160’ error code.

If you have aging (those with a ‘Fail Count’ of 3 or more) ‘160’ error records (Fail Count is the number of successive quarters the same discrepancy is identified by CLER) and you have attempted but been unable to obtain resolution of the discrepancies from the appropriate employing agencies, you may now send these individual enrollees a ‘Notice of Intent to Disenroll’ letter, per the FEHB Disenrollment Regulations. This letter gives individuals 31 days from the date of the letter to provide proof that their enrollment is still valid. A copy of this letter is attached. Please refer to FEHB Carrier Letter 1999-07, dated February 9, 1999, for more information on the FEHB Disenrollment Regulations and other suggested letters. This authorization to send these ‘Disenrollment’ letters does not relieve you of the responsibility of first trying to resolve the discrepancies with the appropriate employing office. And remember, the agencies cannot see your ‘160’ error code records. You must bring these records to the agency’s attention.

A ‘160’ error is most likely due to having a person on your rolls that is no longer eligible for coverage, but there are other conditions that may also trigger a ‘160’ error. This is why you must proceed cautiously when disenrolling persons with a ‘160’ error code. Other reasons include:

- Carriers may report a different Social Security Number (SSN) than the agencies report. This could be because one of the parties made an error in recording a person’s SSN in their database, or the carrier may report a pseudo SSN and the agency reports an actual SSN.
- Carriers may report a survivor annuitant’s SSN in the wrong CLER data input field. Office of Personnel Management’s (OPM) Retirement Services Program (RSP) reports the survivor annuitant’s SSN in the ‘Employee SSN’ data field and the deceased annuitant’s SSN in the ‘Deceased Annuitant SSN’ data field. If a carrier reports these

SSNs in the opposite order, CLER will not be able to match them and a discrepancy will result.

Do not ask individuals to provide proof of valid enrollment to either their Human Resources (HR) or Payroll Offices. They must provide such proof to you. At the end of the 31-day period you will have one of two options:

1. If, at the end of the 31-day period, you have not heard positively from the person, you may then disenroll. You may not unilaterally disenroll without first going through this procedure. Use the 32<sup>nd</sup> day from the date of the letter as the effective date of disenrollment. Your copy of the 'Notice of Intent to Disenroll' letter and a notation of a lack of positive response should be sufficient documentation to satisfy your auditors. Caution: make sure the mailing addresses you use are current. It is possible that you might not hear back from a person with a valid enrollment because you used an obsolete mailing address. You might check any recently submitted claims for a more current address.
2. If enrollees present proof of valid enrollment to you, do not ask them to take the proof to their HR and/or Payroll Offices. Instead, you need to bring the matter to the attention of the enrollee's HR and Payroll Offices and determine why the agency is not reporting the enrollment, or why the enrollment record they are reporting is not matching up with your record.

**Exceptions:** Do not send any Disenrollment Letters to our annuitants (those with payroll office numbers 24900002, 24900003, or 24777777). Annuitant records are more susceptible than others for producing '160' errors that are due to factors other than the person is no longer eligible for coverage. OPM's RSP will assist you with resolving your '160' errors for persons in payroll office number 24900002. You should fax your listing of error code '160' records to 202-606-4237 or 202-606-1640, or send it by mail to Retirement Services Program, OPM, 1900 E Street, NW, Room 4H31, Washington, DC 20415. Your Retirement Reconciliation Contact person will follow-up with you or you may contact this person first. If you don't know who this person is, call Ms. Bernice Tyler-Graddy at 202-606-0104. Payroll office numbers 24900003 and 24777777 are managed by the National Finance Center. Call Ms. Angela Julian at 504-255-4261.

### **Using the Retirement Claim Number or the Office of Workers' Compensation Program (OWCP) Claim Number**

To facilitate obtaining matches on the SSN field, we want you to enter the full, nine-character Retirement Claim Number, or the OWCP Claim Number, when applicable, in the CLER 'Other\_Payroll\_Office\_ID' input field. Using this field will give you an ID match for those annuitants that do not have a SSN. We first asked to have you include the Retirement Claim Number and OWCP Claim Number in your CLER input data in FEHB Carrier Letter 2002-23, dated July 12, 2002. Please refer to that carrier letter for more detail on the content of the Retirement Claim Number. We want you to accomplish this as soon as it is operationally and financially practical for you to do so. If you do not have Retirement Claim Numbers, you may obtain a listing on compact disc by calling RSP's Carrier Information System (CIS) at 478-757-3164. You will need to enter a PIN number. If you don't know your PIN number, please contact your OPM Contract Representative.

## Reporting the Actual SSN

Some FEHB Health Benefits carriers are reporting a pseudo SSN to CLER for certain enrollees. Many Federal agencies do not have the ability to store and report an alternate SSN in lieu of the actual SSN. Thus, discrepancies are created where the agency receives a '163' error code (reported by a Federal agency but not by any FEHB carrier) and you get a '160' error for the same enrollee. All FEHB carriers must report the actual SSN to CLER, unless you don't have the actual SSN or the person does not have a SSN.

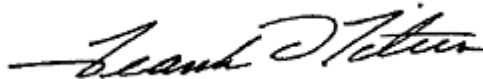
OPM recently issued FEHB Carrier Letter 2003-28, dated September 5, 2003, telling all carriers to not put enrollees' actual SSNs on their carrier ID cards. This means that all carriers will have to have the ability to internally 'cross-walk' an alternate ID to the actual SSN. Thus, all carriers will have the ability to access and report to CLER the actual SSN, again unless you do not have the actual SSN. Carrier Letter 2003-28 said that carriers should issue new membership cards that do not display the SSN "as soon as it is operationally and financially practical" to do so. Similarly, we ask all carriers to report actual SSNs to CLER as soon as it is operationally and financially practical to do so. We acknowledge that we cannot force individuals to give their SSNs to our carriers if they choose not to. However, where you have a person's SSN, we expect you to report the actual SSN to CLER.

Also attached to this letter is a summary of requirements and recommendations for reducing errors in your enrollment data. We developed this summary in conjunction with the National Finance Center, our vendor that operates CLER.

Finally, we recently had a carrier experience great difficulty transmitting its quarterly enrollment data to CLER because their only employee responsible for CLER abruptly resigned just before the next input data was due to CLER. This is not the first time for this sort of situation. We ask that every carrier have someone on staff backing up the primary staff person working on CLER data. This will help ensure an orderly and timely submission of data to CLER. Accurate tracking of discrepancy rates from quarter to quarter relies heavily on all participants submitting their data on time every quarter.

If you have any questions regarding this letter, please contact Eric Figg at 202-606-4083 or through email at <mailto:edfigg@opm.gov>.

Sincerely,



Frank D. Titus  
Assistant Director  
for Insurance Services Program

Attachments