

Tribal/Federal Technical Workgroup

December 5, 2011

3:30PM EST

Meeting Minutes

Tribal Representatives in Attendance: Jim Crouch, Gerald DePerry, Laurie Lus, Tim Manning, Maile Robidoux, Donita Stephens, Elizabeth Turner, Leslie Weber, Carolyn Kershner, Luke Welles, and Jeanette Ziegler.

In attendance from the Office of Personnel Management (OPM): Rachel Aksman, Mary Hartman, Lionell Jones, John O'Brien, Chelsea Ruediger, and Paul Westfall.

In attendance from the National Finance Center (NFC): Lenny Bankston, Darren Chin, Cherie Landry, Chris Knight, PJ Rivera, Brian Sanford, Randy Speed, and Alisa Wells.

Announcements- John O'Brien, OPM

- a. DOMA- The Defense of Marriage Act will apply to tribes, tribal organization, and urban Indian organizations choosing to purchase Federal Employees Health Benefits (FEHB). This means that only legal spouses (not domestic partners) of the opposite sex will be covered as dependents.
- b. Changes to timeline- A timeline was distributed in the first Tribal/Federal Technical Workgroup. Since then, OPM has decided not to request a Statement of Intent from tribal employers. Instead, tribal employers will be asked to notify OPM three months in advance of their desired date of coverage. After notification is received, OPM will send an MOU or contract.
- c. Uploading of enrollment data into TIPS- Tribal employers will be able to upload .txt files with enrollment data. This will prevent HR representatives from having to individually input enrollment information for each employee.
- d. Downloading data from TIPS- Tribal employers will have access to the same canned reports that OPM will have access to. See list below.
- e. Multiple HR offices per tribe- In response to concerns raised at the last Technical Workgroup, OPM and NFC will offer tribes more than one identification number. This will allow separate billing and HR functions for separate lines of business.

Tribal Representatives were asked a series of technical questions. Their responses are summarized below.

How many identifiers do you envision needing for your tribe, tribal organization or urban Indian organization? OPM has a limited number of identifiers and we would like to get an idea of what the need will be.

Answers ranged from 12 to 1 depending on the size and structure of the tribe or organization.

For each identifier, how many people will need access to the account? What types of employees (HR, CFO, Accounting) will require access? OPM and NFC are considering allowing up to 5 points of access per account.

Answers ranged from 10 to 1, again depending on the size and structure of the organization.

It is expected that staff in human resources, accounting/payroll, management, and the financial office will need access to these accounts.

What information do you need with your monthly bill in order to reconcile your records? NFC will provide the following canned reports to OPM and each tribe, tribal organization, or urban Indian organization:

1. Enrollees by Tribe, State, age bands, and plan (monthly, quarterly, yearly)
2. New enrollees per reporting period (monthly, quarterly, yearly)
3. New enrollees per reporting period by tribe (monthly, quarterly, yearly)
4. Disenrollments per reporting period includes measuring both cancellations and terminations (monthly, quarterly, yearly, Open Season)
5. Disenrollments per reporting period by tribe (monthly, quarterly, yearly)
6. Total number of enrollees as of last day of previous month
7. Total number of enrollees as of last day of previous month by tribe (monthly, quarterly, yearly)
8. Run report on all tribe contact information (monthly)
9. Open Season changes by plan
10. Open Season changes by tribe
11. Reason for plan switch (i.e., QLEs) (monthly, quarterly, yearly, Open Season)
12. Reason for plan switch by tribe (monthly, quarterly, yearly, Open Season)
13. Effective Date of Coverage by tribe (monthly, yearly, Open Season)
14. Foster child/stepchild/incapable of self-support/adopted child by tribe (monthly, quarterly, yearly)
15. Billing Identifier, Name, SSN, Plan Code, Premium Amount, Effective Date of Coverage
16. Billing Identifier, Name, SSN, Plan Code, Premium Amount, Date of Disenrollment

Most of the Tribal Representatives were happy with the reports that would be available and with a monthly reporting period. A few questions were raised:

Jim Crouch (California Rural Indian Health Board)- Will tribes be able to run data queries or only have access to canned reports

- Tribes will not be provided with raw data to run queries. Only canned reports will be provided.

Gerald DePerry (Great Lakes Indian Fish and Wildlife Commission)- Will monthly bills be prorated to match actual dates of enrollment or pay periods?

- Yes. NFC has the capacity to pro-rate to the day.

Laurie Lus (Salt River Pima-Maricopa Indian Community)- Asked for follow up on the availability of claims data for evaluating wellness programs.

- OPM is in the process of creating a claims data warehouse. At this point in time, federal agencies do not receive claims data from carriers.
- For the first year of this program, at least, claims data will not be available to tribes. As soon as the warehouse is operational, tribes will have access to that data.
- We are currently working on an evaluation of our own evaluation programs. Laurie, Jeanette, and Liz will be put in contact with the people coordinating that evaluation.

Maile Robidoux (Seattle Indian Health Board)- Will tribes be able to build their own reports, what format will the reports be provided in?

- NFC will provide reports in Excel so tribes can manipulate the data to an extent. Raw data will not be provided to the tribes.
- Will former employees have access to Cobra?
 - Former employees who were covered by FEHB will have access to the Federal program Temporary Continuation of Coverage (TCC) which is similar to Cobra and lasts from 18 to 36 months.

Elizabeth Turner (Hoopa Valley Tribe)- Will eligibility changes be reflected in the reports?

- Yes

Leslie Weber and Carolyn Kershner (Seminole Tribe)- Can the reports also include an employee identification number assigned by the tribes?

- No, the only fields available are those on the form 2809 (enrollment form).
- What type of software are we using for reports?
 - NFC's own software program
- Are we modeling the reports after reports that we already get for federal agencies?
 - No, there is no reporting system similar for federal agencies.
- Will the reports have all the information needed to fill out IRS form 5500?

- OPM is not familiar with this form. Caroline and Leslie agreed to send details about the form and the information needed to complete it.
- On what basis will premiums be pro-rated.
 - Daily

Luke Welles (Arctic Slope Native Association)-Because some tribes will be joining mid-plan year and deductibles will start over in January, can the tribes pay their employees deductibles for them?

- OPM will look into this.

Donita Stephens (Choctaw Tribe)- Bi-weekly reporting would be preferable to monthly reporting.

How many separate tax ID numbers do you have in your tribe or organization?

Answers ranged from 15 to 1.

Who will be responsible for the decision to purchase FEHB in your tribe, tribal organization, or urban Indian organization?

- Many tribes have a Tribal Council that will be responsible for the decision of whether or not to purchase FEHB. The Chairman of the Tribe has signatory authority.
- Others mentioned Presidents and Executive Administrators.

Final feedback/questions:

Carolyn Kershner (Seminole Tribe)

- When will information about rates and plans be available?
 - We are sending out a letter in the next two weeks with more information about the program, how to purchase coverage for employees, and rates.
- Will the handbook be ready before tribes, tribal organizations, and urban Indian organizations are asked to sign anything?
 - The handbook is currently going through our internal review process. We will get it out as soon as possible.
- Will materials be available in multiple languages?
 - No, our materials are available in English only.
- When will OPM post responses to questions received during the consultation process?
 - OPM will post them shortly; have been busy working on implementation process.
- Requested that we make one amendment to the minutes from the last teleconference.

Action Items

- OPM and NFC will discuss the possibility of having sub-departments under one identifier.
- OPM and NFC will discuss the frequency of reporting (daily, weekly, monthly).
- OPM will get Tribal Representatives in contact with the wellness program evaluation team.
- Carolyn and Leslie will send OPM information on the IRS form 5500, especially any information they are concerned will not be present on the reports NFC plans to provide.
- OPM will research the possibility of tribes paying deductibles for their employees.
- OPM will set up a separate call with Luke Welles to discuss issues unique to Alaska.
- OPM will continue to work on responses to the questions collected during the consultation process.
- OPM will make the requested amendment to last month's meeting minutes.