



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT  
Washington, DC 20415

October 24, 2011

Retirement Services

Mr. Larry Waligora, Chairman  
Association of Federal Health Organizations  
P.O. Box 33991  
Washington, DC 20033-0991

Dear Mr. Waligora,

This is in response to your August 8, 2011, letter providing comments on OPM Form 2809. You indicated that these comments are based on the SF 2809 and that they apply to both forms.

As you know, the 30-Day Notice requesting comments on the SF 2809 was published in the Federal Register on June 22, 2011 (76 FR 36582). The notice advised interested parties that the Office of Management and Budget (OMB) would accept written comments until July 22, 2011. Since your comments were submitted after the closing date, we are unable to make your requested changes to the SF 2809 at this time. We will consider your suggestions the next time we make revisions to the SF 2809.

We agree that the OPM 2809 should conform to the SF 2809 and are not in favor of making any changes to the OPM 2809 before changing the SF 2809. However, we would like to address several of your concerns, in the order presented:

*Affordable Care Act Issues:*

- We recognize that there are no longer any dependency requirements for an enrollee's natural children and have publicized this information by means of Carrier Letters, Benefits Administration Letters, the FEHB Handbook, and our FEHB website. However, our statute still includes this as a category of covered child.
- OPM's foster child certification form lists the requirements to be considered a foster child in the FEHB Program. Our intent is to include children who live with an enrollee in a parent-child relationship, regardless of whether they are legally placed.
- We are unable to make your requested change to the table in Item 15 at this time. However, we are confident that we have provided enough information to agencies, carriers, and enrollees so that all parties know that all children are covered until age 26.

*Privacy Act Statement for Medicare's mandatory reporting requirements:*

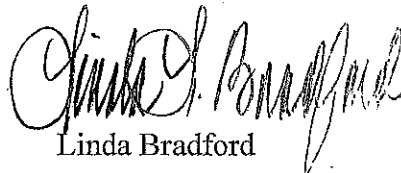
- We are unable to make any changes to the Privacy Act Statement at this time. To do so now would require us to begin a new internal and external approval process, delaying implementation of the revised SF 2809.

*Collecting enrollee and dependent contact information:*

- The enrollee's electronic mail address and preferred telephone number are in part H, under the enrollee's signature block. The form was designed this way due to spacing issues.
- We request electronic mail and phone numbers for dependents who do *not* live with the enrollee so that carriers may contact these individuals if necessary. We do not believe this information is needed for dependents who live with the enrollee, as the carrier can contact the enrollee. Although minor children living with the enrollee may have their own electronic mail addresses and cell phone numbers, they may be incapable of discussing coverage or benefits issues with their FEHB carrier.

We appreciate your taking the time to comment on the OPM 2809. Should you wish to send us any additional suggestions for the next revision, feel free to contact Jay Fritz at [jdfritz@opm.gov](mailto:jdfritz@opm.gov).

Sincerely,



Linda Bradford  
(Acting) Deputy Associate Director  
Retirement Operations