

OMB Supporting Statement

Federal Employees Dental and Vision Insurance Program Enrollment System (BENEFEDS)

OMB Control Number: 3206-0272

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

OPM uses the Federal Employees Dental and Vision Insurance Program (FEDVIP) enrollment system, known as BENEFEDS, to carry out OPM's responsibility to administer the FEDVIP in accordance with 5 U.S.C. chapters 89A and 89B and implementing regulations (5 CFR Part 894). The law and regulations specify who is eligible to enroll and when an individual may enroll or change enrollment. Eligible individuals use the system to enroll and change enrollment, during the annual Federal Benefits Open Season (Open Season) or when experiencing a qualifying life event (QLE). BENEFEDS is the secure enrollment website sponsored by OPM that allows eligible individuals to enroll or change enrollment in a FEDVIP plan.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

BENEFEDS is used by Federal Civilian and U.S. Postal Service (USPS) employees, retirees (annuitants), survivor annuitants, compensationers, and their eligible family members to enroll and be enrolled in FEDVIP. In addition, BENEFEDS is used by most uniformed services retirees and their families eligible to enroll in dental and vision insurance and most uniformed services active duty family members eligible to enroll in vision insurance under FEDVIP. BENEFEDS is also used for the collection of FEDVIP premiums from the enrolled populations.

BENEFEDS is OPM's approved online portal for enrolling in FEDVIP dental and vision plans. It provides tools for enrollees to confirm eligibility; compare insurance plans; and enroll online. It can be accessed by computer or smartphone. Once an individual has completed the registration and enrollment, a confirmation page will display with the plan and premium amount, coverage effective date, premium effective date, and covered family members, if applicable. BENEFEDS provides the insurance carrier with information necessary to enable the carrier to pay and process claims for the individual and any covered family members, which the carrier would otherwise have to obtain from the enrollee by other means. The consequences of not collecting the information on enrollment in BENEFEDS would be that some other method of obtaining the same information would have to be developed, tested and implemented.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

BENEFEDS uses information technology to collect the information from FEDVIP eligible enrollees because it is an online enrollment system. Completion of the FEDVIP dental and or vision registration and enrollment forms online represent a voluntary election by the respondent, and the information collected can only be obtained from the respondent. The enrollment forms are available online at BENEFEDS.com and meets the Paperwork Reduction Act of 1995 (Public Law 104-13, 44 U.S.C. chapter 35).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Every effort is made to identify and avoid duplication. The number of times respondents are required to complete the FEDVIP dental and vision form(s) is kept to a minimum. After initial registration and enrollment, completion of a new form is required only when the individual desires to make a change in his or her vision or dental insurance enrollment status or to change plans during Open Season or if the enrollee experiences a QLE.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information is not collected from small businesses.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this information were not collected, respondents could not enroll in the FEDVIP or make changes to their dental and vision insurance enrollment, and premium collection could not be facilitated. The only way to reduce the burden would be to restrict an enrollee's choice to make changes to his/her enrollment, which would require making changes in current regulation.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that have not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that a consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Respondents are required to report certain information for purposes of FEDVIP premiums being deducted from payroll or an annuity. Specific events and criteria (such as marriage, birth or acquisition of a child, move out of a regional plan's service area) must be met in order to make changes at times of the year other than the annual Federal Benefits Open Season. Since these opportunities are set by regulation and represent changes in an individual's circumstances which may or may not be under his or her control, there is no way to predict or control how often changes are requested.

No other circumstances listed in this question apply to this collection.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection,

the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, reported, disclosed, or Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On October 19, 2021, OPM published this information collection at Notice of Proposed Rulemaking (NPRM) to amend title 5 of the Code of Federal Regulations (CFR) part 894 in the Federal Register at 89 FR 57764. The proposed rule had a 60-day comment period but no comments were received on the information collection.

9. Explain any decision to provide any payment or gift to respondents, other of than remuneration of contractors or grantees.

No payments or gifts will be given to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The information collected is protected by the Privacy Act of 1974. The routine use of disclosure appears in the Federal Register for OPM/Central-I.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The information collected does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

Approximately 388,261 respondents will make new enrollments or plan changes during Open Season and will be processed each year from Federal Civilian and U.S. Postal Service (USPS) employees, retirees (annuitants), survivor annuitants, compensationers, and their eligible family members. The public reporting burden for this collection is estimated to average 7.27 minutes (.1211 hours) for a respondent to submit an enrollment including time for reviewing education and support but may not include time for reviewing a plan and specific benefits. The total burden hour estimate for this form is 47,018 hours.

Form Name	Form Number	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
<i>Federal Employees Dental and Vision Insurance Program (FEDVIP) Enrollment System (BENEFEDS)</i>	3206-0272	388,261	1	.1211	47,018	\$19.68	\$925,314.24

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary a usual business or private practices.

There are no costs to respondents or record keepers resulting from the collection of information.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

There is no Government cost for the BENEFEDS website. The FEDVIP premiums are 100% enrollee paid which includes the BENEFEDS contracted fees for FEDVIP administration.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

The changes are not at the individual level but are a result of an increased number of users.

16. For collections of information whose results will be published, outline plans for tabulation

and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of this information collection are not published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are seeking approval to not display the expiration date for OMB approval of the information collection. Too often, users of the form see the expiration date and erroneously assume that the form itself is void after that date. These forms are printed and distributed through various agencies. It is cost prohibitive to print new forms just to change the expiration date.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

There are no exceptions.