The Honorable James M. Inhofe  
Chairman  
Committee on Armed Services  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

The enclosed report is in response to section 713 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (Public Law 115-232). Section 713 requires a report with three elements: (a) A description of lessons learned from the transition of the administration of TRICARE Retiree Dental Program (TRDP) to Federal Employees Dental and Vision Insurance Program (FEDVIP); (b) An assessment of the effectiveness of the transition; and (c) A timeline for the implementation plan for the transition of the administration of TRICARE Dental Program (TDP) to FEDVIP.

The lessons learned from the transition relate to the Office of Personnel Management (OPM) and the Defense Health Agency (DHA) ensuring better coordination and communication, data-sharing, and operations/implementation. Transition effectiveness was a success in that 639,437, or 77.5 percent, of the previous 824,704 TRDP policyholders transitioned to FEDVIP in 2019. An additional 118,909 Uniformed Services eligible policyholders, who were not previously enrolled in TRDP, chose to enroll in a FEDVIP dental plan. A timeline of the transition for TDP to FEDVIP, which cannot be finalized until OPM and DHA make key decisions, is included in the report. This transition will be more complex than the previous transition.

Thank you for your interest in the health and well-being of our Service members, veterans, and their families. A similar letter is being sent to the Chairman of the House Armed Services Committee.

Sincerely,

James N. Stewart  
Assistant Secretary of Defense for Manpower and Reserve Affairs, Performing the Duties of the Under Secretary of Defense for Personnel and Readiness

Enclosure:
As stated

cc:  
The Honorable Jack Reed  
Ranking Member
The Honorable Adam Smith  
Chairman  
Committee on Armed Services  
U.S. House of Representatives  
Washington, DC 20515

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Thank you for your interest in the health and well-being of our Service members, veterans, and their families. A similar letter is being sent to the Chairman of the Senate Armed Services Committee.

Sincerely,

James N. Stewart  
Assistant Secretary of Defense for Manpower and Reserve Affairs, Performing the Duties of the Under Secretary of Defense for Personnel and Readiness

Enclosure:  
As stated

cc:  
The Honorable William M. “Mac” Thornberry  
Ranking Member
Report to the Armed Services Committees of the Senate and House of Representatives

Transition in the Administration of the TRICARE Retiree Dental Plan and TRICARE Dental Plan to the Federal Employees Dental and Vision Insurance Program

Final Report
September 2019

In Response To: Section 713 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (Public Law 115-232)
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Introduction

This report is in response to section 713 of the John S. McCain National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2019 (Public Law 115-232) to submit, not later than January 1, 2020, a report to the Armed Services Committees on the transition in the administration of the TRICARE dental insurance plan for retirees from administration by the Department of Defense (DoD) as the TRICARE Retiree Dental Plan (TRDP), to administration by the U.S. Office of Personnel Management (OPM) as part of the Federal Employees Dental and Vision Insurance Program (FEDVIP).

Section 715 of the NDAA for FY 2017 (Public Law 114-328) directed the Secretary of Defense to enter into an agreement with the Director of OPM to allow certain TRICARE-eligible individuals, such as certain retirees, surviving spouses, and other dependents, to enroll in dental and vision benefits, and active duty family members to enroll in vision benefits offered under FEDVIP. The Defense Health Agency’s (DHA) TRDP ended on December 31, 2018. DHA and OPM worked together to educate TRICARE beneficiaries about the termination of TRDP and the option to enroll in FEDVIP during the Federal Benefits Open Season from November 12 – December 10, 2018. Starting January 1, 2019, enrolled TRICARE beneficiaries started receiving dental and vision coverage through FEDVIP. TRICARE beneficiaries are now eligible to enroll or change their enrollment in FEDVIP during any Federal Benefits Open Season for their dental and vision needs and outside of open season with a Qualifying Life Event (QLE).

Subsequently, section 713 of the NDAA for FY 2019 directs the Secretary of Defense, through an agreement with the Director of OPM, to allow persons that are eligible for the TRICARE Dental Program (TDP) to enroll in the FEDVIP. Current TDP beneficiaries would become eligible for dental coverage under FEDVIP, beginning on or after January 1, 2022.
I. Background

OPM administers FEDVIP as a voluntary, enrollee-pay-all dental and vision program that offers eligible participants a choice among ten (10) dental and four (4) vision carriers. TRDP offered a single dental carrier. The first opportunity for specific TRICARE-eligible individuals to enroll in FEDVIP was during the 2018 Federal Benefits Open Season, which ran from November 12 through December 10, 2018, with FEDVIP coverage effective January 1, 2019. The following subsections outline the communication efforts, eligibility changes/program accommodations, changes in operations, post-transition efforts and transition outcome.

A. Communication Efforts

- DHA and OPM jointly mounted an extraordinary education and outreach campaign to ensure that uniformed services beneficiaries were informed of TRDP’s pending termination date and educate them to take action if they wished to enroll in FEDVIP without any break in coverage. Frequent communications between the various partners -- DHA; OPM; Long Term Care Partners (LTCP), the FEDVIP enrollment and premium contractor (also known as BENEFEDS); Delta Dental, a TRDP contractor; and OPM’s 14 FEDVIP carriers (10 dental and 4 vision) -- promoted consistent messaging to the eligible population. Communication efforts included the added challenge of educating transitioning uniformed service members about available choices and how to make an informed decision.

- OPM launched a transition-specific website, TRICARE.BENEFEDS.com, in February 2018. This dedicated website became the central resource for information on the transition and offered timely information on eligibility, a dental and vision plan comparison tool, guided the enrollment process, and educational materials. Staff optimized the site for viewing on a computer, as well as tablets and smartphones. Individuals could sign up to receive alerts via email or text about the Federal Benefits Open Season and when new information was available. Overall, the TRICARE.BENEFEDS.com website had 358,000 registrants, 10 million page views, and 500,000 site visits. More than 1 million email alerts and 316,000 text alerts were sent to the individuals who signed up.

- DHA engaged in a substantial direct outreach effort to TRDP enrollees through a variety of platforms and channels, including news media, social platforms, internal communications pathways and beneficiary-centric publications (e.g., newsletters, articles). In total, DHA disseminated more than 600 TRICARE Health Plan (THP) and FEDVIP Open Season products from January 1 through December 31, 2018, to raise awareness, educate beneficiaries about open season, and encourage beneficiaries to take required actions to enroll or make changes to their coverage. This effort included:

  - Mailing 3.1 million postcards to the uniformed service populations eligible for FEDVIP from June – August 2018.
- Mailing a TRDP-targeted Pre-disenrollment Letter in September 2018 to over 700,000 households.

- Disseminating four toolkits to over 100 partner organizations, which included THP and FEDVIP Open Season turn key products.

- Hosting monthly meetings focused on THP and FEDVIP Open Season with approximately 100 Military and Veteran Service Organizations (VSOs), which represent 5.5 million beneficiaries.

- Emailing 3.6 million Defense Manpower Data Center (DMDC) registered emails to notify beneficiaries about THP and FEDVIP Open Season. The email had a 41 percent open rate with recipients who had commercial email addresses (well above the 19 percent standard open rate for health and human services sector marketing emails).

- Mailing a second TRDP enrollee targeted Pre-disenrollment Letter in November 2018 that included BENEFEDS website and phone number to over 700,000 households.

- Sending post-open season direct emails to TRDP enrollees through the TRDP contractor-Delta Dental.

- Placing post-open season automated calls to TRDP enrollees.

- Hosting three FEDVIP specific webinars, which totaled nearly 3,000 attendees.

- Mailing a third enrollee-targeted letter post-open season directing TRDP enrollees who did not enroll in FEDVIP during open season to contact OPM’s contractor to determine if they were eligible for belated enrollment.

- Collaborating with Defense Finance and Accounting Service to include a FEDVIP message in the October and November Leave and Earnings Statements (LES). LES’s were delivered to 100 percent of all eligible beneficiaries.

- Posting THP and FEDVIP content on TRICARE.mil pages, which received 63.9 million page views in 2018.

- Posting 220 social media messages related to THP and FEDVIP Open Season on DHA channels, yielding 4.1 million impressions and 122,000 engagements.

- Educating customer service staff who assist TRICARE beneficiaries with more than 30 inclusions in customer service training sessions and disseminating updates to better communicate and promote consistent messaging with beneficiaries.
DHA and OPM jointly and separately sponsored interactive webinars, published articles in newsletters and magazines, arranged poster placements, participated in interviews on government TV channels, published YouTube videos, provided personnel to serve at 58 military retiree activity day events, provided speakers for Military Service Organization (MSO) meetings, and attended military benefits fairs.

During the transition period, staff continuously updated primary websites, including TRDP.org, TRICARE.mil, BENEFEDS.com and OPM.gov. OPM and DHA worked closely with MSOs and VSOs. These campaigns targeted millions of people worldwide.

B. FEDVIP Eligibility Changes and Program Accommodations during the Transition

Regulations governing FEDVIP were updated in a timely manner to accommodate the newly eligible population. Updates required substantial revision of the FEDVIP eligibility rules since the eligibility requirements for Federal civilians and uniformed services were markedly different. OPM published an interim final rule, Federal Employees Dental and Vision Insurance Program: Extension of Eligibility to Certain TRICARE-Eligible Individuals; Effective Date of Enrollment, 83 FR 58175, on November 19, 2018. In addition, OPM added a new Subpart H to 5 CFR 894 to include special provisions for TRICARE-eligible individuals. OPM also published a final rule, Federal Employees Dental and Vision Insurance Program: Extension of Eligibility to Certain TRICARE-Eligible Individuals; Effective Date of Enrollment, 84 FR 26543, on June 7, 2019.

DHA and OPM worked jointly to review, understand, and apply the uniformed services eligibility rules and incorporate these changes into OPM regulations. These regulations were the foundation for the business rules used during the enrollment process. Staff developed documents and matrices to explain terms for everyone to use as references and reduce confusion. OPM and DHA worked jointly to develop a foundational document that succinctly defined the eligibility rules. Scenarios developed by OPM’s contractor, and these foundational documents set the operational business rules for the BENEFEDS enrollment system.

OPM issued FEDVIP carrier guidance to ensure that TRDP beneficiaries who were receiving treatment (in progress) and transitioned to FEDVIP would not be negatively impacted by FEDVIP carrier’s existing exclusions. The FEDVIP contracts were also modified to include the newly eligible TRICARE population.

OPM gave eligible beneficiaries a generous timeframe in which to make belated enrollments after the Federal Benefits Open Season closed. Both federal civilian and uniformed services eligible beneficiaries who missed the Federal Benefits Open Season were able to request belated enrollment up to March 10, 2019 as allowed under 5 U.S.C. § 894.503.
C. Changes in BENEFEDS Operations

- In preparation for the transition, OPM worked with their contractor, LTCP, to modify and simplify the BENEFEDS user interface by restructuring the registration and enrollment flow. This included a simple eligibility step-thru, updating the business rules repository and logic, creating separate guided pathways for Federal civilian and uniformed services retirees and family members, increasing enrollment capacity, increasing protections, and improving the efficiency of the FEDVIP enrollment system. LTCP redesigned the BENEFEDS enrollment system to accept over seven times the typical enrollment volume.

- To ensure appropriate access to customer service for inquiries or enrollment, LTCP staffed its call centers in continuous waves increasing to more than 1,200 persons at peak to provide adequate call coverage.

- Enrollment into FEDVIP occurred through BENEFEDS.com, the secure enrollment website or the BENEFEDS call center. Overall, 83 percent of eligible uniformed service enrollments were made online. The TRICARE.BENEFEDS.com microsite was instrumental in familiarizing the TRICARE population, prior to open season, with how the FEDVIP enrollment process worked. As with the civilian Federal employee enrollments, a self-certification process with initial eligibility criteria was performed at the time of enrollment and then later verified via the retired pay providers.

D. Post-Transition Coordination and Planning

- A detailed transition-out strategy document was developed in collaboration with OPM, DHA, Delta Dental, and LTCP for enrollment and other customer service engagement to ensure a seamless and successful transition from the incumbent TRDP Delta Dental to FEDVIP via LTCP, OPM’s eligibility and enrollment contractor under OPM. The strategy focused on coordinating key transition tasks, defining ownership and handoffs and tracking key dates. Major priorities included letters and messaging, call center and Interactive Voice Response (IVR) planning, and preparing retired pay centers. A dedicated team focused on coordinating the efforts and activities of OPM, DHA, LTCP, Delta Dental, Defense Finance and Accounting Service, Coast Guard Personnel and Pay Center, and the 14 FEDVIP carriers. This ensured consistent communication, proactive problem solving, and delivery of successful results.

- DHA coordinated with the outgoing TRDP contractor, Delta Dental, to ensure necessary contract “transition out” requirements were included in the TRDP contract to support the move to FEDVIP.

- As part of the post-transition coordination, OPM created talking points used by all parties in communications with beneficiaries to ensure consistent, unified and easily understood guidance.
- Per OPM and DHA agreement, DHA redirected Congressional FEDVIP-related inquiries to OPM. As of July 2019, DHA continues to receive a few inquiries via phone and mail. DHA informs beneficiaries that TRDP has ended and redirects them to BENEFEDS or FEDVIP carriers as appropriate.

E. Transition Outcome

- The table and graphic below provide an overview of uniformed service enrollees in FEDVIP dental and vision plans.

Summary of Uniformed Services FEDVIP Enrollment During Open Season and Belated Enrollment

<table>
<thead>
<tr>
<th>Timeframe</th>
<th>Uniformed Services Dental</th>
<th>Uniformed Services Vision</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Season – 11/12/18 – 12/10/18</td>
<td>627,352</td>
<td>292,215</td>
</tr>
<tr>
<td>Belated Enrollment (12/11/18 to 3/10/19)</td>
<td>91,454</td>
<td>38,541</td>
</tr>
<tr>
<td>Overall Totals: 11/11/18 to 3/10/19</td>
<td>718,806</td>
<td>330,756</td>
</tr>
<tr>
<td>(includes Opens Season and Belated)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall Totals to include Dual Eligible</td>
<td>754,429</td>
<td>N/A</td>
</tr>
<tr>
<td>(captured on 4/11/2019)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Per a DHA analysis dated April 11, 2019, there were 754,249 uniformed services policyholders enrolled in FEDVIP dental plans. Overall, FEDVIP covers over 1.5 million lives through these uniformed services policyholder enrollments. These 754,249 uniformed services policyholders include 710,844 who chose to enroll using their uniformed services eligibility and 43,405 who decided to enroll under their separate Federal civilian eligibility (dual-eligible). These individuals were not required to take action for the 2019 plan year to remain enrolled in FEDVIP. Enrollment in FEDVIP automatically continues each year unless the policyholder chooses to change or cancel coverage.

Overall, 639,437 or 77.5 percent of the previous 824,704 TRDP policyholders transitioned to FEDVIP Dental in 2019. These 639,437 prior TRDP policyholders cover a total of 1,265,160 lives that transitioned to FEDVIP dental plan options. An additional 118,909 uniformed services members and/or their family members who were not previously enrolled in TRDP chose to enroll in a FEDVIP dental plan.

The next available time to enroll in FEDVIP will be during the 2019 Federal Benefits Open Season or any time an individual has a QLE. By regulation, the Federal Benefits Open Season occurs the Monday of the second full work week in November through the Monday of the second full work week in December. This means open season will run from November 11, 2019 through December 9, 2019; with FEDVIP coverage effective January 1, 2020. QLE enrollments are effective the following month following the QLE for the TRICARE eligible population.
• The transition also included a new vision benefit offering for TRICARE eligible beneficiaries comprised of the existing TRDP population, as well as Active Duty Family Members; Survivors; Medal of Honor recipients (not on active duty) and their family members; Reserve members, their families, and their survivors; and National Guard members, their families and their survivors.
II. Lessons Learned from TRDP to FEDVIP Transition

A. Inter-Agency Coordination and Communication

The success of the TRDP to FEDVIP transition is largely due to ongoing communications and coordination between OPM and DHA at multiple levels. DHA and OPM initiated discussions long before calendar year 2017. Initial discussions focused on the feasibility of transitioning the TRDP program to FEDVIP. In 2017, DHA and OPM initiated more frequent communications at multiple levels. Challenges included different rules, resources, experiences, and leadership. Defining terms, establishing agreements, and creating consistent and concise messaging assisted the agencies’ efforts to effectively develop the operational capability and communicate with the TRICARE-eligible population.

TRDP and FEDVIP use different terms such as for the enrollee, sponsor, subscriber, plan, and contract. A big challenge was defining the eligible population and having a mutual understanding in regards to the differences between TRICARE eligibility laws and OPM’s FEDVIP eligibility rules. Staff-developed documents and matrices explained terms to reduce confusion. Scenarios developed by LTCP, based on the TRICARE-eligibility matrix, also improved understanding. LTCP used these scenarios to establish their online self-certification criteria. LTCP staff called beneficiaries who raised concerns about their eligibility and enrollment status. LTCP developed workarounds in those cases where the systems did not match up due to misunderstandings.

Each organization identified staff-level primary points of contact (POCs). These POCs communicated on an ongoing basis (daily) and defined a shared work plan to monitor implementation progress. DHA and OPM participated in weekly discussions on the implementation and design of the BENEFEDS enrollment system. DHA and OPM held weekly communication coordination meetings from February 2018 through December 2018. DHA and OPM combined their communications plans to ensure consistency in messaging. DHA and OPM senior leaders met on, at least, a quarterly basis to assess the progress of the transition.

B. Data Sharing

Data sharing required long timelines and often resulted in delays to data reporting. Interagency data sharing was required to:

1. Understand the characteristics of TRICARE-eligible populations and provide summary data to the FEDVIP carriers before the Federal Benefits Open Season, and
2. Meet the reporting requirements required for this assessment.

Sharing data between OPM and DHA required justification, assessment of needs, creation of an interagency security agreement, and a Memorandum of Agreement (MOA). Each agreement required multiple meetings and several levels of approvals to ensure appropriate measures to safeguard the privacy of enrollees and appropriate data handling. A final revision to the data sharing agreements, to include identifying retirees who may have enrolled as government civilian employees, resulted in a delay in final enrollment results beyond OPM’s
belated open season. DHA and OPM held multiple meetings to obtain a mutual understanding of the final results and how to use the data.

C. Communications

Communication coordination was critical to the success of the transition. As noted in sub-section “A” above, DHA and OPM held weekly coordination meetings from February 2018 through December 2018. DHA and OPM combined their communications plans to ensure coordination and consistency in messaging. This illustrates the importance of early communication discussion and uniform messaging through multiple channels to ensure potential enrollees make an informed choice.

OPM launched a transition-specific website, TRICARE.BENEFEDS.com. This dedicated website became the central resource for information on the transition and hosted information on eligibility, dental plan option comparisons, vision plan option comparisons, and when to enroll and how to enroll. All communication materials uniformly referred eligible individuals to the TRICARE.BENEFEDS.com website for the most up-to-date information.

DHA’s direct communication campaign was both substantial and successful. However, about 200,000 (5 percent) of the individual notices to TRDP participants and other eligible were returned due to the beneficiaries’ addresses not being current within the Defense Enrollment Eligibility Reporting System (DEERS). This is in line with the 5 percent return mail rate commonly experienced by the Defense Logistics Agency. In future transitions, a defined joint communications plan is key, so all parties are aware of messaging, print schedules, mail schedules, email schedules, and automated call schedules. The communication plan should include which office will be responsible for content development, printing, and mailing (as needed). Experience indicates it would be beneficial to initiate automated calls early in the communications cycle and to remind beneficiaries to update their DEERS mailing address. In addition, DHA needs to continue to leverage military medical treatment facility (MTF) personnel to instruct beneficiaries to update their personal contact information such as phone, email, and address in DEERS when they check in for appointments.

TRDP offered continuous open enrollment year round, but FEDVIP has clearly defined open seasons. This caused additional confusion for a population used to enrolling at-will. During post-open season and beyond, talking points received from OPM were instrumental in ensuring continued consistent messaging and timely responses to beneficiaries. Many TRICARE eligible beneficiaries applied for enrollment after the end of open season. These beneficiaries were redirected to BENEFEDS for further guidance. These issues point to a need for strong communication efforts with the beneficiary population in future endeavors of this nature. Future communication efforts may include support from local MTF and installation leadership in promotional campaigns. There is also a need to utilize email addresses and appropriate social media as a continuous, inexpensive and expeditious vehicle for DHA and OPM to educate the eligible TRICARE population on an ongoing basis. This will require further work by DHA to formalize its electronic notification policy.
D. Operations and Implementation

As previously noted, OPM worked with its contractor, LTCP, to modify and simplify the BENEFEDS user interface, increase enrollment capacity, increase protections and improve the efficiency of the FEDVIP enrollment system. Changes to the user interface included restructuring the registration and enrollment flow to add a simple eligibility step-thru process and updating the rules repository and website logic to include separate guided pathways for Federal civilian, uniformed services retirees, and their families. These guided pathways helped to ensure eligibility accuracy and data integrity in the enrollment process. In anticipation of the expected enrollment volume, the BENEFEDS enrollment system was redesigned to accept over seven times the previous year’s enrollment volume. Overall, the enrollment process was a success. OPM’s Post-Federal Benefits Open Season survey showed that 95 percent of all new enrollees were satisfied with their enrollment experience. However, in the interest of performance improvement, two areas of improvement were identified and resolved which will provide a good foundation for future enrollments:

1. Enrollment Processing

As demonstrated by customer satisfaction scores, the volume of enrollments and anecdotal feedback, the majority of the transitioning populations’ enrollment experience was easy, intuitive, and positive. However, due to the complexity of the uniformed services eligibility, the number of dual-eligible persons, and inherent differences in the TRDP and FEDVIP program structures, there were small nuances in the various permutations of eligibility for this population. This resulted in pockets of exceptions. For example, some survivors did not clearly understand how to appropriately indicate their status, which resulted in incorrect selections during enrollment. DHA, OPM, and LTCP established a response model within the first few days to identify and reach out to these individuals, and then further refined the model during the open season transition period. A dedicated LTCP ‘Tiger Team’ was established in the initial days of open season. This team of cross-functional resources scoured the customer service floors and data throughout each day to specifically identify, troubleshoot and resolve these types of issues (whenever possible, within 24 - 48 hours). This team identified the aforementioned challenge and established a protocol to reach out to those impacted and corrected the issue.

A second nuance identified was in regards to retirees choosing the proper method for premium payment, specifically those receiving Department of Veteran Affairs (VA) disability payments. BENEFEDS interfaces were established with DFAS and Coast Guard retired pay providers to receive premium payments monthly via allotment. However, the VA does not support allotments from VA disability pay to pay for insurance benefits.

As part of the enrollment process, retirees were asked whether they had enough funds in their retired pay to cover premium payments. If not, then they were required to provide bank information to set up automatic monthly premium payment. It was identified early in the open season enrollment process that some retirees considered their VA payments as part of their retired pay. As a result of this discovery, changes were made to the content to clarify what was meant by retired pay. OPM and their contractor also worked closely with the retirement pay center to research, identify and resolve new enrollee payment issues.
During open season and the period for belated enrollments, OPM became aware of circumstances where QLEs needed to be created. For example, a uniformed services retiree had enrolled in FEDVIP during open season but later was determined by the VA to be permanently and totally disabled, rated 100 percent disabled, was not eligible to enroll in FEDVIP, and would instead receive dental services from the VA. The individual contacted BENEFEDS to cancel his/her enrollment, but there was no QLE allowing cancellation in this circumstance. This type of Service member was accommodated via OPM’s equity and good conscience provision to allow the member to cancel his/her enrollment.

2. Call Center

As demonstrated by customer satisfaction scores well above 90 percent, the volume of phone enrollments, and anecdotal survey feedback, the overall performance of the FEDVIP call center was strong, fielding almost 630,000 calls during the 4-week open season period. However, there were significant variances in the arrival patterns and talk time durations of the TRDP audience from the historical federal civilian audience. Since a large portion of the TRDP population enrolled very early in open season, the average speed of answer (ASA) was longer which resulted in the callers experiencing longer than anticipated wait times. A large portion of the Federal civilian population usually enrolls toward the end of open season.

OPM and DHA worked closely with LTCP during the year leading up to open season to model multiple scenarios of expected call center volume, arrival, average handle times, and to develop sophisticated recruitment, training, staffing, infrastructure and scheduling plan. To ensure appropriate access to customer service agents, LTCP opened a dozen call centers across the country in continuous waves increasing to more than 1,200 persons, not including support and training staff. The final model for the call arrival pattern used the 12 prior years of historical arrival patterns experienced during open season with the Federal civilian population and then projected a 20 percent increase in overall volume early in open season to account for a surge by the TRDP population. Despite this anticipation of early call volume, the actual calls from the TRDP population came in an even higher volume. The chart below provides a summary of the 2017 open season call volumes, projected 2018 open season call volumes, and the actual 2018 open season call volumes.
Calls came in higher volumes earlier than expected.

OPM and DHA adjusted strategies to accommodate the unanticipated call volumes. In response to the unexpected call volume, LTCP quickly employed a multi-faceted strategy to accommodate the higher than modeled volumes, differences in arrival and longer talk times. This strategy included increasing staff at all levels within the call center, implementing helpful IVR messaging for misdirected calls and deploying the aforementioned ‘Tiger Team’ to quickly identify and implement system adjustments to accommodate nuanced requests of callers more efficiently. In addition, LTCP implemented dynamic staff scheduling adjustments to ensure adequate coverage during peak times. It is notable that although ASA was high overall, it was concentrated to the core hours of the day – 10am - 4pm Eastern Time. Calls before and after those hours were often picked up in seconds or with no wait time at all. These concentrated recovery efforts drove down ASA to seconds during most of the final week of the Federal Benefits Open Season.
III. Assessment of Transition Effectiveness

A. Overall Assessment

DHA and OPM met the challenges involved in offering FEDVIP to this new uniformed service population. OPM and DHA executed the largest expansion of the FEDVIP since the inception of the program in 2006.

DHA and OPM provided the opportunity for the more than 3 million retirees and family members, formerly eligible for the TRDP, to choose the dental and vision plans that best fit their needs from a selection of 10 dental plan options and 4 vision plan options. As noted earlier, 639,437 or 77.5 percent of the previous 824,704 TRDP policyholders transitioned to FEDVIP in 2019. An additional 118,909 uniformed services eligible beneficiaries, who were not previously enrolled in TRDP, chose to enroll in a FEDVIP dental plan.

There were no post-open season surveys inquiring why previously enrolled TRDP beneficiaries did not enroll in FEDVIP. Overall, the low rate of complaints and congressional inquiries may suggest that the majority of the estimated 200,000 eligible individuals who did not enroll in FEDVIP made a personal choice not to enroll. Possible reasons for not choosing to enroll in FEDVIP include:

- Chose to enroll in an employer sponsored plan or in spouse’s employer sponsored plan.
- Already enrolled through their employer or their spouse’s employer and decided to forego the additional expense of a second plan.
- Was dual eligible and enrolled in FEDVIP prior to the transition. When TRDP eligible enrollees are enrolled as Federal civilians, their premiums are paid on a pre-tax basis.
- Previously enrolled in TRDP, but did not use the benefit and decided not to transition.
- Decided it was more cost effective to pay for dental services out-of-pocket than pay annual premiums.
- Determined they did not wish to pay for dental insurance as they did not see the benefit due to their advanced age.

For the first time, uniformed service retirees and active duty military family members could enroll in vision coverage with their choice of eight vision plans offered by four vision carriers. At the end of belated open season, 330,756 policyholders enrolled in a vision plan.
B. Beneficiary Continuity Assessment

To ensure the transition did not disadvantage the enrollees who moved from TRDP to FEDVIP, from one government program to another, OPM wrote special guidance to its FEDVIP carriers. It required them to cover in-progress treatment only for transitioning TRDP enrollees for the 2019 plan year, regardless of current plan exclusions for care initiated before the enrollee’s effective date. This requirement included the assumption of payments for covered orthodontia services up to the FEDVIP policy limits, and full payment (where applicable) up to the terms of the FEDVIP policy for covered services completed (but not initiated) in the 2019 plan year, such as crowns and implants. There was no requirement for carriers to provide in-progress coverage for orthodontia in a plan where an enrollee must meet a waiting period. The ability for the transitioning TRDP enrollees to have no break in service, if they enrolled during open season, and the added benefits of the 2019 in-progress FEDVIP guidance, facilitated a seamless continuity of coverage.

C. Communication Outreach Assessment

DHA and OPM mounted a substantial joint outreach campaign and promptly provided education and decision making tools to the TRDP-eligible population.

DHA communications played a key role in ensuring that those eligible for the new dental benefits and/or enrolled in TRDP heard about the transition from TRDP to FEDVIP, as indicated by the results of OPM’s Post-Open Season Survey (see below). The majority of respondents indicated that TRICARE.MIL and TRDP.ORG were critical sources. Both of these sources redirected eligible beneficiaries to TRICARE.BENEFEDS.com for additional information.

How Did Uniformed Services Enrollees hear about the TRDP to FEDVIP Transition?

<table>
<thead>
<tr>
<th>Response Options</th>
<th>% of Respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>FRIEND OR COWORKER</td>
<td>7.27%</td>
</tr>
<tr>
<td>PAYROLL MESSAGING</td>
<td>6.44%</td>
</tr>
<tr>
<td>SOCIAL MEDIA POST OR VIDEO</td>
<td>6.52%</td>
</tr>
<tr>
<td>PRESS RELEASE OR ARTICLE</td>
<td>13.96%</td>
</tr>
<tr>
<td>VIRTUAL BENEFITS FAIR, WEBINARS, OR WEBCASTS</td>
<td>1.08%</td>
</tr>
<tr>
<td>HEALTH FAIR, BENEFITS FAIR, OR RETIREMENT</td>
<td>2.09%</td>
</tr>
<tr>
<td>AGENCY BENEFITS OFFICER, INTRANET SITE, OR HUMAN...</td>
<td>2.17%</td>
</tr>
<tr>
<td>RETIREMENT SERVICES OFFICER (RSO)</td>
<td>4.42%</td>
</tr>
<tr>
<td>FEDVIP CARRIER ADVERTISEMENT (E.G., BILLBOARD,...</td>
<td>16.67%</td>
</tr>
<tr>
<td>OPM.GOV</td>
<td>7.81%</td>
</tr>
<tr>
<td>TRICARE.MIL</td>
<td>32.64%</td>
</tr>
<tr>
<td>TRDP.ORG</td>
<td>70.46%</td>
</tr>
</tbody>
</table>

*Responders were asked to select “all that apply,” so could choose more than one response.

Both OPM and DHA resources played a key role in supporting uniformed service members enrollment decisions, as indicated by the results of OPM’s Post-Open Season Survey.
results (see below). The major sources for making enrollment decisions were OPM’s contractor websites BENEFEDS.com and TRICARE.BENEFEDS.com. Usage of these sites indicates that TRICARE-eligible beneficiaries spent considerable time using web-based education tools before and during the enrollment process.

Resources Uniformed Service Members Used to Help Make an Enrollment Decision

Of those respondents stating they visited TRICARE.BENEFEDS.com, nearly 98 percent found the information about the TRDP transition helpful. The following provides quotes received from respondents to OPM’s Post-Open Season survey.

- “Very informative, easy-to-follow requirements and instructions. Appreciated side-by-side comparison of various plans. Thanks for making the transition painless!”
- “… Everything possible was done to be sure folks had everything they needed to weigh the options, make a decision, and get onboard. Thanks”
- “This was the most SEAMLESS process I have EVER experienced in transitioning anything. Thank you so much!! Great Job!!”
- I greatly appreciate the advance notice - the email reminders - and the process established at BENEFEDS to make the transition a simple action - Thank you”

Over 95 percent of new FEDVIP enrollees expressed satisfaction with the enrollment process during the 2019 Federal Benefits Open Season.

The transition to FEDVIP was part of the “Take Command” campaign, as enterprise-wide communications campaign designed to encourage beneficiaries to become more proactive in managing their health care. “Take Command” is an ongoing campaign that received public relations industry recognition as an exceptional marketing health care campaign. In 2019, the campaign won the Public Relations Society of America (PRSA) Silver Anvil, Marketing
Consumer Products Healthcare Industry; American Business Association Stevie Gold Award; Hermes Creative Platinum Award; and Bulldog Public Relations (PR) Silver Award.

OPM and DHA coordinated with external partners, including the TRDP contractor (Delta Dental), FEDVIP carriers, and OPM’s enrollment and premium administration contractor (LTCP) to ensure minimal impact and confusion for uniformed services enrollees during the post-transition period.

DHA and OPM continue to support the beneficiaries by discussing other scenarios and other products, such as OPM’s TRICARE Eligible Individuals Handbook. The Handbook provides detailed information on eligibility, enrollment, cost coverage, and frequently asked questions. OPM provided slides on FEDVIP for various TRICARE briefings. DHA and OPM were able to effectively and efficiently reach and educate millions of this newly eligible FEDVIP population.
IV. Timeline for Implementation of TDP to FEDVIP Transition

The following timeline is proposed for the TDP to FEDVIP transition. This timeline has been reviewed by DHA, OPM, LTCP and the DMDC but cannot be finalized until OPM and DHA make key decisions. The events below are subject to change but provide an estimate of scheduled activities. It should be noted that the TDP to FEDVIP transition will be much more complicated than the TRDP transition, however, there is less time available for coordination.

<table>
<thead>
<tr>
<th>Projected Date</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>December 2019</td>
<td>Finalize Key Decisions / Complete MOA between OPM and DHA</td>
</tr>
<tr>
<td>January 2020</td>
<td>Commence development of Communication Messaging and Materials</td>
</tr>
<tr>
<td>March 2020</td>
<td>Regulatory and Policy Changes Requests (if needed)</td>
</tr>
<tr>
<td>June 2020</td>
<td>Initiate MOA between OPM and DMDC for Data Exchange</td>
</tr>
<tr>
<td>September 2020</td>
<td>Develop Functional Requirements</td>
</tr>
<tr>
<td>January 2021</td>
<td>Implement Communications with Beneficiaries</td>
</tr>
<tr>
<td>February 2021</td>
<td>Initiate Systems Development and Testing</td>
</tr>
<tr>
<td>October 2021</td>
<td>Ensure Systems Operational</td>
</tr>
<tr>
<td>November 2021</td>
<td>Open Season for FEDVIP</td>
</tr>
<tr>
<td>January 2022</td>
<td>FEDVIP Coverage effective for eligible Beneficiaries</td>
</tr>
<tr>
<td>March 2022</td>
<td>Conduct After Actions Assessments</td>
</tr>
</tbody>
</table>

Notes:

1. Key Decisions include identifying the eligible population, possible data sharing options, premium subsidies, and other payments.
2. OPM administers dental benefits under FEDVIP pursuant to 5 U.S.C. § 8952. DHA administers the TDP pursuant to 10 U.S.C. § 1076a. Depending on agreed upon terms may result in legislative or regulatory changes.
3. OPM required to decide on plan design and data elements before this date.
4. Requirements include verification, and eligibility standards, enrollment, and method for collection and reimbursement of premiums.
5. Systems are for the requirements specified in item 4. Some of these systems are new for OPM and will require coordination with DMDC and DHA.
V. Conclusion

The TRDP to FEDVIP transition was completed January 2019. OPM and DHA executed the largest expansion of the FEDVIP since the inception of the program in 2007.

DHA and OPM provided the opportunity for the more than 3 million uniformed service retirees and their family members, formerly eligible for TRDP, to choose the dental and vision plans that best fit their needs from a selection of fifteen dental plan options and eight vision plan options. Approximately 77.5 percent or 639,437 of the prior 824,704 TRDP policy holders transitioned to FEDVIP in 2019. An additional 118,909 uniformed services eligible policy holders that were not previously enrolled in TRDP chose to enroll in FEDVIP dental plans. In addition to transitioning a large percent of prior TRDP policyholders, the following was achieved:

- Uniformed service retirees formerly enrolled in TRDP who chose to enroll in FEDVIP did not experience any disruption in dental service coverage when TRICARE ended on December 31, 2018, and FEDVIP coverage began on January 1, 2019.

- Due to special guidance issued by OPM on in-progress care to FEDVIP Carriers for the 2019 plan year, enrollees that transitioned from TRDP to FEDVIP while receiving in-progress care were not disadvantaged by the change to FEDVIP.

- For the first time, uniformed service retirees and active duty military family members could enroll in vision coverage with their choice of eight vision plans offered by four vision carriers.

- Over 95 percent of new FEDVIP enrollees expressed satisfaction with the enrollment process during the 2019 Federal Benefits Open Season.

- DHA and OPM mounted a substantial joint outreach campaign. Communications, education and decision making tools were provided to the TRDP eligible population in a timely manner.

- The transition to FEDVIP was part of the “Take Command” campaign, an enterprise-wide communications campaign designed to encourage beneficiaries to become more proactive in managing their health care. The campaign received public relations industry recognition in 2019 as an exceptional marketing health care campaign and won the PRSA Silver Anvil, Marketing Consumer Products Healthcare Industry; American Business Association Stevie Gold Award; Hermes Creative Platinum Award; and Bulldog PR Silver Award.
• Provision of these communications helped ensure a successful transition as indicated by the results from the Post-Open Season Survey.

• OPM and DHA coordinated with external partners, including the TRDP contractor (Delta Dental), FEDVIP carriers, and OPM’s enrollment and premium administration contractor LTCP to ensure minimal impact and confusion for uniformed services enrollees during the post-transition period.

Various lessons learned from the TRDP to FEDVIP transition will be considered with the TDP to FEDVIP transition. Frequent discussions between OPM, LTCP, DMDC, and DHA are ongoing to ensure key decisions such as eligibility, enrollment, and premium subsidies are made. The understanding and key decisions will provide a framework to build an effective joint outreach communication campaign. Future milestones will assist to develop requirements and systems needed to allow eligible beneficiaries to enroll and utilize FEDVIP dental plans.
VI. Glossary

A. Acronyms

ASA average speed of answer
DEERS Defense Enrollment Eligibility Reporting System
DHA Defense Health Agency
DMDC Defense Manpower Data Center
DoD Department of Defense
FEDVIP Federal Employees Dental and Vision Insurance Program
FY Fiscal Year
IVR Interactive Voice Response
LTCP Long Term Care Partners
MOA Memorandum of Agreement
MSO Military Service Organization
MTF military medical treatment facility
NDAA National Defense Authorization Act
OPM Office of Personnel Management
QLE Qualifying Life Event
TDP TRICARE Dental Program
TRDP TRICARE Retiree Dental Plan
VA Department of Veteran Affairs
VSO Veteran Service Organization

B. Definitions

BENEFEDS: The OPM-sponsored enrollment and premium processing system for the FEDVIP, currently administered by LTCP; BENEFEDS includes a secure enrollment website and a call center.

Carrier: A company that acts or functions as an underwriter or insurer point of contact between insurance companies.

DEERS: The DoD computerized data repository that houses information on uniformed service members and their family members.

Dual-Eligible: Beneficiaries who qualify for both federal civilian and uniformed services retiree benefits due to their or family member’s present or previous employment.
**QLE:** Qualifying life event allowing for changes and cancellations of coverage. QLEs are generally different for TRICARE and FEDVIP programs.

**Policyholder:** The individual under whose name an insurance policy is registered.
Appendix: Demographics

The following are other demographics collected in regards to the prior TRDP eligible enrolled.

**TRDP Sponsors by Age Group before FEDVIP transition:**

![TRDP Sponsors by Age Group](image)

**TRDP Sponsors by Age and OPM enrolled:**

![TRDP Sponsors by Age Group and FEDVIP Enrolled](image)
Beneficiary Categories of those TRDP eligible enrolled and not enrolled in FEDVIP:

<table>
<thead>
<tr>
<th>Category</th>
<th>Not Enrolled</th>
<th>OPM Enrolled</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retiree</td>
<td>163,710</td>
<td>566,468</td>
</tr>
<tr>
<td>Dependent of Retiree</td>
<td>182,245</td>
<td>619,810</td>
</tr>
<tr>
<td>Dependent Survivor</td>
<td>28,157</td>
<td>76,842</td>
</tr>
<tr>
<td>Other</td>
<td>3,019</td>
<td>2,040</td>
</tr>
</tbody>
</table>