United States Department of the Interior

U.S. Fish and Wildlife Service

Fire Management Branch

3833 S. Development Ave.

Boise, ID 83705

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**February 1, 2017**

IN REPLY REFER TO:

Memorandum

To: Regional Fire Management Officers

From: Chief, Fire Management Branch, National Wildlife Refuge System

Subject: Offering Casual Employees Federal Employee Health Benefits (FEHB)

**Purpose:** The purpose of this instruction memorandum is to notify regional and field offices that casual employees who meet eligibility criteria will now be offered Federal Employee Health Benefits (FEHB), and to outline the process for offering these benefits to casual employees.

**Timeframe:** Effective January 1, 2017

**Policy/Action:**

At the time of initial hire, casual employees will be provided with the attached Conditional Offer of Federal Employee Health Benefits form and the FEHB Fast Facts for Casuals form. The forms provide information on casual employee eligibility in the FEHB Program under the Affordable Care Act, and also provide the casual employee with the information on how premiums will be paid and what costs the employee will be responsible for, regardless of how much they work. Links to FEHB websites are also provided on the form for additional information on various health plans.

Once the casual employee has reviewed and signed the Conditional Offer of Federal Employees Health Benefits form, it will be sent to the Casual Payment Center (CPC) with the casual employee’s W-4 and electronic deposit forms for inclusion in employee files and for tracking purposes.

Eligibility: Eligibility criteria include working at least 130 hours per calendar month for at least 90 days. Based on the response of the casual at time of hire, when the eligibility requirements are met, the individual will be contacted by the CPC with direction on how to proceed. The casual will have 60 days to respond and enroll in FEHB.

The Conditional Offer of Federal Employee Health Benefits form should be sent to the CPC for inclusion in employee files.

Attached are guidance documents that explain the procedures and the required forms for casual employees who elect to enroll in the FEHB Program. Additional guidance can be found at: <https://www.nifc.gov/programs/cpc_procedures.html>.

**Coverage:**

Health care coverage for 28 days (2 federal pay periods) will be activated beginning on the first day of the following pay period after the CPC receives the completed Health Benefits Election form (SF-2809).

If the casual works any amount of time after health benefits have been terminated within the calendar year, the casual can re-enroll by submitting a new Health Benefits Election Form (SF-2809) to the CPC. The casual may elect to cancel coverage by completing Part F-Cancellation of FEHB of the SF-2809. This form should also be submitted to the CPC.

**Background:**

The Office of Personnel Management (OPM) has recently issued a final regulation to extend eligibility for health insurance coverage and a full government contribution under the Federal Employees Health Benefits (FEHB) Program to temporary firefighters and fire protection personnel, including casual employees hired under the Administratively Determined Pay Plan for Emergency Workers.

On November 14, 2012, OPM issued an interim final regulation (77 CFR 67743) to allow agencies to request FEHB coverage for intermittent employees engaged in emergency response and recovery work as defined by the Stafford Act. Since 2013, the NPS has been offering FEHB coverage to seasonal firefighters and to employees who hold a fire qualification or support fire.

In issuing the final regulation, OPM concluded that its current policy of categorically excluding intermittent employees from FEHB coverage was no longer in the public interest and should be changed, especially in light of the need for agencies to attract and to quickly hire emergency workers and in recognition of the hazardous conditions those employees often face. On November 21, 2016, OPM issued a final rule to amend the FEHB Program regulations to expand coverage to certain temporary, seasonal, and intermittent employees who are expected to work at least 130 hours per calendar month for at least 90 consecutive days. OPM has also reserved the authority to limit FEHB coverage for intermittent employees only to the periods during which they are in a pay status.

Over the past year, OPM and the Interior Business Center have worked closely with representatives from the U.S. Forest Service and Department of Interior to ensure that casual employees are offered the opportunity to enroll in the FEHB Program under the Affordable Care Act. Effective January 1, 2017, casual employees will now be given the option of enrolling in the FEHB program once the eligibility requirements are met.

**Coordination:** This memorandum has been coordinated with the DOI Casual Payment Center.

**Contact:** If you have questions, please contact Reah Reedy, National Incident Business Lead, at 208-387-5736 or [reah\_reedy@fws.gov](mailto:reah_reedy@fws.gov).

**Attachments:**

Guidance document – FEHB coverage for casual employees

Conditional Offer of Federal Employee Health Benefits Form

FEHB Fast Facts for Casuals

Health Benefits for Casuals Hiring Unit Guidance