



United States Office of Personnel Management
Healthcare and Insurance

Benefits Administration Letter

Number: 26-202

Date: July 15, 2026

Subject: Readiness assessment of 100% verification of Open Season elections when a family member is added

ACTION REQUIRED

The Federal Employees Health Benefits (FEHB) Protection Act of 2025 (FEHB Protection Act), enacted as Section 90101 of Public Law [119-21](#), directs OPM to strengthen family member eligibility verification and oversight within the FEHB Program, including the Postal Service Health Benefits (PSHB) Program. Beginning with Open Season for Plan Year 2027, employing offices must verify 100 percent of Open Season elections in which a family member is added. OPM is requesting each agency headquarters Benefits Officer complete the readiness survey in this Benefits Administration Letter (BAL) by July 31, 2026. The survey will help OPM identify potential implementation obstacles and work collaboratively with employing offices to explore solutions that support implementation readiness before Open Season begins.

Background

OPM has progressively strengthened family member eligibility verification through a series of BALs. [BAL 20-203](#) provided procedures for removing ineligible family members, and [BAL 21-202](#) expanded on the 2018 rule, "Removal of Eligible and Ineligible Individuals from Existing Enrollments," ([83 FR 3059](#)) by directing employing offices to request proof of family member eligibility for an employee's Initial Opportunity to Enroll (IOE) and all qualifying life events (QLEs).

In response to the Government Accountability Office (GAO) report [GAO-23-105222](#), OPM directed employing offices to validate certain Open Season elections in [BAL 24-201](#) and expanded the requirement to include IOE and QLEs in [BAL 24-204](#). That guidance established a minimum review requirement of 10 percent of Self Plus One and Self and Family Open Season elections while recommending a 100 percent review of those transactions. BALs [25-201](#) and [26-201](#) reinforced that requirement and provided additional guidance on scenarios that impact verification review.

The FEHB Protection Act codifies and elevates this standard by requiring verification of family member eligibility when an enrollee adds a family member during Open Season.

What Is Changing This Open Season

Effective with Open Season for Plan Year 2027, the FEHB Protection Act requires employing offices to verify the eligibility of every newly added family member before enrollment can be finalized. Employing offices are required by statute and regulation to verify 100 percent of family member additions. Employing offices must request and evaluate the proof-of-[relationship document](#)(s) for every Open Season election in which a family member is added.

- Qualifying Life Events (QLEs): Beginning July 4, 2026, 100 percent of QLEs that result in a family member being added must also be reviewed and the QLE must be verified.
- Open Season elections: Eligibility must be documented and verified for all family members added during Open Season.

If a family member is determined to be ineligible, the enrollee must be notified promptly, and the enrollee must submit either a corrected election or the ineligible family member must be removed before the election is processed further.

Employing Office Readiness Assessment

OPM is requesting that employing offices complete a survey to assess their readiness to implement the FEHB Protection Act requirement of verifying 100 percent of Open Season elections when a family member is added.

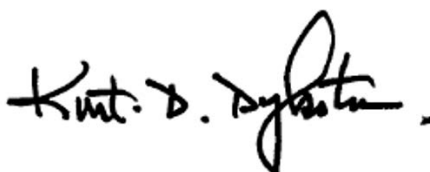
The survey responses will be used to inform any supplementary guidance OPM may issue before Open Season begins.

Please complete the readiness survey using the hyperlink provided below. To allow OPM sufficient time to review responses, completed surveys must be submitted no later than July 31, 2026.

[Survey Link.](#)

If you have any questions regarding the information in this BAL, please contact your Agency's headquarters Benefits Officer.

Sincerely,

A handwritten signature in black ink that reads "Kurt D. Dykstra" with a small flourish at the end.

Kurt D. Dykstra

General Counsel and Healthcare and Insurance Designee
for Scott Kupor, Director

U.S. Office of Personnel Management