



**BlueCross BlueShield
Association**

An Association of Independent
Blue Cross and Blue Shield Plans

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May 24, 2023

Kiren Ahuja
Director
U.S. Office of Personnel Management
1900 E Street, NW
Washington, DC, 20415-1000

Submitted via the Federal Regulations Web Portal, <http://www.regulations.gov>

RE: Postal Service Reform Act: Establishment of the Postal Service Health Benefits Program, Interim Final Rule and Request for Comments

Dear Director Ahuja:

The Blue Cross Blue Shield Association (BCBSA) appreciates the opportunity to provide comments on the “Postal Service Reform Act: Establishment of the Postal Service Health Benefits Program” as issued in the Federal Register on April 6, 2023 ([88 Fed.Reg. 20383](#)).

BCBSA is a national federation of 34 independent, community-based and locally operated Blue Cross and Blue Shield companies (Plans) that collectively provide health care coverage for one in three Americans. For more than 90 years, Blue Cross and Blue Shield companies have offered quality health care coverage in all markets across America – serving those who purchase coverage on their own as well as those who obtain coverage through an employer, Medicare and Medicaid. Blue Cross and Blue Shield companies have 5.8 million members enrolled in the Federal Employees Health Benefits (FEHB) program, representing more than half of all U.S. federal workers, retirees and their families, who are enrolled in the program.

We appreciate the Office of Personnel Management’s (OPM)’s consideration of the operational challenges Postal Service Health Benefit (PSHB) Plans face in standing up a new program and we support the interim final rule’s alignment with existing FEHB program processes. We share OPM’s goal of ensuring current and former Postal Service employees and their families can easily transition to the PSHB program. We offer the following feedback to support this shared goal of minimizing coverage disruptions for Blue Cross Blue Shield members:

1. **Program Administration.** BCBSA supports OPM’s alignment between the PSHB and FEHB program rules.
2. **Plan Year.** BCBSA supports the rule’s PSHB plan year that will run from January 1 to December 31, starting in 2025, with open season changes and reenrollments taking effect January 1st of each year.

3. **Automatic Enrollment.** BCBSA supports OPM automatically enrolling FEHB-enrolled Postal Service employees and annuitants who do not make an election to enroll in a PSHB plan during the transitional Open Season. We agree such enrollees should be automatically enrolled in a PSHB plan offered by their current FEHB carrier in a plan with equivalent or most similar benefits and cost-sharing as their current FEHB plan. In cases where a carrier is not offering PSHB plans, we support OPM automatically enrolling them in the lowest-cost nationwide PSHB plan that is not a high deductible health plan and that does not charge an association or membership fee.

4. **Plan Contracting.** BCBSA supports OPM aligning standards between PSHB and FEHB carriers, as well as the requirement for carriers to provide Medicare Part D benefits to Postal Service annuitants and maintain separate reserves. We also agree with the requirement to ensure enrollees' benefits, actuarial values and drug formularies are consistent as they transition from FEHB to PSHB plans their first year, except for PSHB benefits needed to integrate Medicare Part D prescription drug benefits.

We appreciate your consideration of our comments. If you have any questions or want additional information, please contact Sarah Heard sarah.heard@bcbsa.com.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Yoder".

David Yoder
Senior Vice President, Federal Employee Program