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RETIREMENT COVERAGE DETERMINATIONS

*A Guide for Human Resources Specialists
Helping DoD employees retire*



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References	3
Section I - Background	
History	6
Retirement Systems	7
Section II - Retirement Coverage Principles	
Definitions	9
Exclusions from CSRS	10
Exclusions from FERS	10
Exclusions - Items to Watch	11
Term, TAPER, and Indefinite Appointments	11
Social Security Coverage.....	12
The Five Year Test	12
Section III - Retirement Coverage Determinations	
Retirement Coverage Determination Steps	14
Conner v. OPM.....	17
First Hires (Table).....	18
Rehires (Table)	19
Transfers & Conversions (Table)	20
Coverage Determination Tree.....	21
Retirement Coverage for Employees with Prior DC System Coverage	22
DC Municipal Employees Retirement Coverage Steps	23
Federal Employees with Prior DC System Coverage	24
Federal Employee Retirement Coverage Steps	25
Retirement Coverage Determinations Made on January 1, 1987	27
FERS Election Opportunities	27
Belated FERS Elections.....	28
Section IV - Auditing Employee Records & Correcting Coverage Errors	
Procedures to Follow	30
Employment History Worksheet.....	31
Section V - Correcting Retirement Coverage Errors	
Federal Erroneous Retirement Coverage Correction Act (FERCCA).....	32
Retirement Coverage Elections under FERCCA.....	33
FERCCA Errors.....	34
Deemed FERS Errors	34
Other Retirement Coverage Errors	34

Section VI – Miscellaneous Job Aids

Adding and Subtracting Calendar Days for Retirement 37
Retirement System Codes 38

REFERENCE	TOPICS / ISSUES COVERED
United States Code (USC)	
5 USC § 8331	Defines employee, annuitant, survivor, basic pay, average pay and other key retirement issues
5 USC § 8332	Creditable service for retirement eligibility under CSRS
5 USC § 8348	Explains appropriations and administration of the Civil Service Retirement and Disability Fund
5 USC § 8402	Specifies which employees are not automatically covered by FERS (legal basis for the 5-year test)
5 USC § 8411	Creditable service for FERS
5 USC § 2105	Definition of “employee”
26 USC § 3102(a)	The amount of OASDI taxes that should have been withheld from an employee’s pay is credited to the employee regardless of whether it is paid by the employer.
26 USC § 6511	IRS 3 year statute of limitation to accept money from wages for an employee’s Social Security credit
Code of Federal Regulations (CFR)	
5 CFR 831.201	Exclusions from CSRS retirement coverage
5 CFR 831.901 – 911	Law enforcement officer and firefighter coverage under CSRS
5 CFR 839.101 – 1304	Correction of retirement coverage errors under the Federal Erroneous Retirement Coverage Correction Act (FERCCA)
5 CFR 842.103	Coverage under FERS
5 CFR 842.104 & 105	Statutory and regulatory exclusions from FERS
5 CFR 842.801 – 809	Law enforcement officer and firefighter coverage under FERS
5 CFR 846.201 – 205	Election of FERS, belated elections, correction of errors and responsibilities

REFERENCE	TOPICS / ISSUES COVERED
5 CFR 1605	Correction of administrative errors to TSP accounts
5 CFR 1606	TSP breakage attributable to employing agency errors
The CSRS and FERS Handbook (formerly FPM 830-1)	http://www.opm.gov/asd/htm/hod.htm
Chapter 10, Coverage	Rules for determining whether an employee is covered by FERS or CSRS and whether an employee with CSRS coverage has regular CSRS or CSRS Offset coverage
Chapter 11, Elections of FERS Coverage	Explains the circumstances under which employees may elect FERS coverage
Chapter 12, Special Coverage Rules	Unique coverage rules that apply to specific groups of individuals and employment situations under CSRS & FERS
The Guide to Processing Personnel Actions (formerly FPM 296-33)	
Chapter 4	Figure 4-3, Block 30, Retirement Plan
Chapter 5	Paragraph 10, Retirement System Forms
Chapter 32	Corrections of coverage errors
OPM Web Site - FERCCA Web Site	
http://www.opm.gov/benefits/correction	Benefits Administration Letters BAL 00-111 President Signs Retirement Coverage Error Correction Legislation Public Law 106-265 BAL 00-113 Correcting Retirement Coverage Errors BAL 00-114 FERCCA Implementation BAL 02-103 FERCCA Erroneous FERS Coverage in Effect for Less than 3 Years
Thrift Savings Plan Web Site/Bulletins	
http://www.tsp.gov/bulletins/01-4.pdf	TSP participation
http://www.tsp.gov/bulletins/98-21.pdf	Changes to TSP error correction procedures

REFERENCE	TOPICS / ISSUES COVERED
RSPB Handbook – 10th Edition	
	Tab AA - Rehired Employees
	Tab BB - Reemployed Annuitants
	Tab DD - OWCP & Retirement
FAS Web Site	www.cpms.osd.mil/fas
http://www.cpms.osd.mil/fas/benefits/pdf/309_ehis.pdf	Employee handout explaining CSRS-Offset to assist employees deciding between Offset and electing FERS
http://www.cpms.osd.mil/fas/benefits/pdf/201_204_rg.pdf	The most recent version of the Retirement Coverage Determinations Reference Guide and Link to OPM Web Site
Significant Court Cases	
<i>Conner v. OPM</i> (US Court of Appeals for the Federal Circuit) 96-3110 Decided January 21, 1997	The Court ruled that OPM’s regulations implementing the 5-year test in the FERS law were incorrect. Changed how the 5-year test is applied retroactive to 01/01/87.
<i>James B. King, Director, OPM v. Merit Systems Protection Board</i> 96-3012	The Board found that employees are not entitled to money erroneously contributed to CSRS that should have been remitted to SSA in payment of OASDI taxes under FERS.
<i>Killip v. OPM</i> , 991 F. 2d 1564 (Fed. Cir. 1993) Retirement Counselor Letter 93-202 dtd September 28, 1993 Subject: Killip v. OPM and Regulations on Belated Elections to Transfer to the Federal Employees Retirement System (FERS)	The Court found that OPM lacks authority to allow retroactive transfers by employees who had an opportunity to make an election, regardless of the circumstances that may have prevented the employee from making an informed decision. This case also determined that employees who were incorrectly denied a FERS election right by being placed automatically in FERS by the agency could “deem” coverage.

Section I – Background

This section provides a historical review of events affecting Federal employee benefits and an overview of the retirement systems.

History

Prior to 1984, the Federal Civil Service Retirement System (CSRS) was the civilian retirement system for most Federal employees. Coverage was generally determined by the type of appointment. For example, an employee hired on a career or career conditional appointment is covered by CSRS, while an employee hired on a temporary appointment was not covered because the appointment is excluded from coverage.

The Social Security Amendments of 1983 (Public Law 98-21) provided that certain Federal employees, principally those first hired after December 31, 1983, were to be covered by Old Age, Survivors, and Disability Insurance (OASDI) taxes. These taxes are also referred to as Federal Insurance Compensation Act (FICA) taxes. They form the basis for Social Security benefits administered by the Social Security Administration (SSA). Public Law 98-21 also provided that all Federal employees (other than nonresident aliens) are subject to Health Insurance taxes (Medicare), regardless of coverage by FICA taxes.

Public Law 98-168 required CSRS employees subject to the 1983 Amendments to begin making reduced contributions (1.3 percent of basic pay) to CSRS in conjunction with Social Security taxes, pending the establishment of a new retirement system. Individuals covered under CSRS and Social Security during those interim years (January 1, 1984 through December 31, 1986) were placed under a system called CSRS Interim.

Public Law 99-335 established the Federal Employees Retirement System (FERS), which became effective on January 1, 1987. With the establishment of FERS, human resource offices were tasked with the responsibility for determining retirement system coverage for each employee. Eligible employees were provided an opportunity to elect FERS coverage during the Open Season that ran from July 1987 through December 1987.

Public Law 105-61 established the FERS Open Enrollment Act. This law provided another opportunity for employees covered by CSRS, CSRS-Offset and certain employees covered by FICA only to elect to transfer to FERS. This “Open Season” began on July 1, 1998, and ended on December 31, 1998.

Public Law 106-265, the Federal Erroneous Retirement Coverage Corrections Act (FERCCA), enacted September 19, 2000, changed the rules for correcting some retirement coverage errors that lasted at least 3 years after December 31, 1986, or where an employee was covered by FERS erroneously and can choose to stay in FERS (these are called deemed FERS elections). FERCCA may provide a choice of retirement systems. Information on FERCCA can be found at 5 CFR Part 839, the OPM FERCCA web site (www.opm.gov/benefits/correction).

Retirement Systems

Who is covered by CSRS?

- Employees first hired prior to January 1, 1984.
- Employees rehired under a covered appointment after a break in service of less than 365 days from a CSRS covered appointment. If the break is at least 4 days, the employee has a 6 month opportunity period to transfer to FERS.

Who was covered by CSRS Interim?

- Employees first hired, rehired, or converted to a covered appointment between January 1, 1984 and December 31, 1986.
- CSRS Interim was implemented pending the establishment of the FERS. This retirement system closed on December 31, 1986.

Who is covered by CSRS Offset?

- CSRS Interim employees who met the 5-year test on January 1, 1987. These employees were automatically converted from CSRS Interim to CSRS Offset coverage on January 1, 1987.
- Employees who are rehired in a covered appointment after a break in service of more than 365 days and who meet the 5-year test. These employees have a 6 month opportunity to transfer to FERS.

Who is covered by FERS?

- Employees first hired on or after January 1, 1984. (If hired before January 1, 1987, these employees would have been CSRS Interim and would have been converted to FERS on January 1, 1987, because they would not have met the 5-year test).
- Employees who are rehired in a covered appointment after a break in service of more than 365 days and who do not meet the 5-year test.
- Employees who elected FERS coverage during transfer opportunities.

- Employees who are rehired in a covered appointment after a separation from an appointment covered by FERS (*once FERS always FERS*).

Who is covered by FICA (Social Security)?

- Employees on appointments that specifically exclude them from any Federal retirement system coverage.
- CSRS Offset and FERS employees -- these employees make contributions to FICA in addition to either CSRS or FERS.

Section II – Retirement Coverage Principles

Retirement coverage determinations are easier when a personnelist understands certain basic coverage principles. Definitions, rules regarding appointments excluded from retirement coverage, Social Security coverage, and the 5-year test are provided in this section.

Definitions

Continuity of Coverage -- This rule allows some employees to retain their previous retirement coverage while in an appointment excluded by regulation. The employee must have been covered under CSRS or FERS and must have moved into an excluded appointment (by transfer, rehire or conversion) with no break in service (a break of 3 days or less). If the requirements are met, the employee retains their previous retirement coverage.

Conversions -- Employees who move from one appointment in an agency to another appointment in the same agency with no break in service (or a break in service of 3 days or less).

Covered Appointment / Service -- An appointment or service during which the employee was covered under CSRS, CSRS Interim, CSRS Offset, or FERS.

First Hires -- Newly appointed employees who have no prior Federal civilian service.

Intermittent -- Service performed without a regularly scheduled tour of duty.

Reemployed Annuitant -- A CSRS or FERS Annuitant who has returned to active Federal service under conditions that do not result in the termination of their annuity.

Rehires -- Employees who have previous Federal civilian service and are reemployed by the Federal government following a break in service of 4 days or more.

Senior Officials -- Members of Congress, Officials in Executive Schedule Levels I-V, and certain SES (non-career SES) employees. For example: most cabinet secretaries, deputy and assistant secretaries, heads and top officials of agencies, boards and commissions, personal staff of the President and Vice-President, certain Federal judges (see 5 U.S.C. 5312 and 5317). The senior officials who are subject to mandatory Social Security coverage are listed in section 10A1.3-6 of the CSRS and FERS Handbook.

Social Security, OASDI (Old Age, Survivors, and Disability Insurance) taxes, or FICA (Federal Insurance Compensation Act) taxes -- Employment taxes that form the basis for Social Security benefits administered by the SSA.

Temporary Appointment Not To Exceed (NTE) -- Temporary or time-limited appointments made for a specific period of time (normally NTE 1 year).

Temporary Appointment Pending Establishment of a Register (TAPER) -- A temporary appointment authorized by the OPM pending the establishment of a register from which permanent employees can be selected.

Term Appointment -- An appointment that will last longer than 1 year but not more than 4 years.

Transfers -- Transfers occur when employees move from one Federal agency to another with no break in service or a break in service of 3 days or less.

Appointments EXCLUDED from CSRS Coverage

- By Law - CSRS & FERS Handbook, Chapter 10, 10A1.3-3B and Title 5 U.S.C. 8331
- By Regulation - CSRS & FERS Handbook, Chapter 10, 10A1.3-3C and Title 5 CFR 831
- **Common Appointments Excluded from CSRS:**
 - * Temporary Appointment NTE 1 year or less
 - * Intermittent Work Schedule (unless employee is on a career or career conditional appointment)
 - * Term Appointment
 - * Temporary Appointment Pending Establishment of a Register (TAPER)
 - * Indefinite Appointment

Appointments EXCLUDED from FERS Coverage

- By Law - CSRS & FERS Handbook, Chapter 10, 10A1.3-5B & C; and Title 5 U.S.C. 8401(11)

- By Regulation - CSRS & FERS Handbook, Chapter 10, 10A1.3-5D and; Title 5 CFR 842
- **Common Appointments Excluded from FERS:**
 - * Temporary Appointment NTE 1 year or less
 - * Intermittent Work Schedule (unless employee is on a career or career conditional appointment)

Exclusions - Items to Watch

NOA 112 and 512	TAPER (Temporary Appointment Pending Establishment of a Register) or pending final determination of eligibility for permanent appointment.
NOA 120, 122, 520 and 522	United States citizens given overseas limited appointments. The length of the appointment is the governing factor (see Temporary Appointments NTE, below)
NOA 146, 147, 148, 149, 546, 548 and 549	Employees serving under limited term, limited emergency, and noncareer (designated as indefinite) appointments in the SES.
Work Schedule Code I or J	Intermittent Work Schedule. Intermittent employees (i.e., non full time employees without a regularly scheduled tour of duty) unless the employee has a career or career-conditional appointment.
Temporary Appointment NTE	The length of the appointment is the governing factor. Employees serving under appointments limited to 1 year or less are excluded from retirement coverage. A series of appointments and extensions each limited to 1 year or less does not confer coverage.
Tenure Group 3	Indefinite Appointment. Employees serving under nonpermanent appointments, designated as indefinite, made after January 23, 1955.

Retirement Coverage Rules for TERM, TAPER, and Indefinite Appointments

- These appointments are excluded from coverage under CSRS, but not FERS.

- **Continuity of Coverage** – Employees covered by CSRS who transfer or convert to a TERM, TAPER or indefinite appointment, without a break in service of more than 3 days, will remain covered by CSRS.
- Employees in TERM, TAPER, or indefinite appointments who **do not meet the 5-year test** (not vested in CSRS) will have **FERS coverage**.
- Employees in TERM, TAPER, or indefinite appointments who **meet the 5-year test** (vested in CSRS) are never automatically placed under FERS. They will be FICA only, with a 6 month opportunity to elect FERS coverage:
 - * If they do not elect FERS and are later converted to a covered appointment, they will have CSRS or CSRS Offset coverage based on their service history. They will **not** have another opportunity to elect FERS during this period of service. Employees have only one opportunity to elect FERS during a continuous period of service.

Social Security Coverage

An employee is subject to Social Security if:

- The employee was first hired in a covered appointment on or after January 1, 1984,
- OR**
- The employee had a break in CSRS covered service greater than 365 days that ended after December 31, 1983.

Do not count the following as breaks in service for Social Security purposes:

- Disregard all periods of time during which a separated employee was receiving benefits from the Office of Workers' Compensation Program (OWCP). (The time the employee was receiving OWCP benefits is considered a leave of absence, not a separation for Social Security coverage purposes.)
- Disregard a break in service in which an employee separated from their civilian position to perform military service and exercised their restoration rights under Chapter 43 of title 38 U.S.C.

The Five-Year Test

The 5-Year Test determines whether an employee will be placed automatically in FERS. If the 5-year test is met, the employee is vested in CSRS and retains the right to

continue coverage under CSRS. If the 5-year test is not met, the employee will be placed automatically in FERS. (Reference: CSRS & FERS Handbook, Chapter 10, Section 10A1.1-2 I)

The 5-Year Test is met if:

- The employee had 5 years of potentially creditable civilian service as of December 31, 1986,

OR

- The employee had more than a 3 day break in service ending after December 31, 1986, had at least 5 years of potentially creditable civilian service as of the date of the last break in service, **and** had at least one day of prior covered service under CSRS or the Foreign Service Retirement and Disability System (FSRDS).

Section III – Retirement Coverage Determinations

Developing a methodical approach to making retirement coverage determinations is an excellent way to learn how to make consistently accurate determinations. **Before you begin the coverage determination steps, write out the employee’s service history showing all periods of service and types of appointments.**

The information provided in this section supplements Chapter 10A1.3-7 of the CSRS and FERS Handbook for Personnel and Payroll Offices. Charts and explanations of procedures are included to further clarify how retirement coverage determinations should be made.

Retirement Coverage Determination Steps

STEP 1: Is the current appointment EXCLUDED from CSRS or FERS coverage or both?

(See page 11 for a list of common exclusions)

If NO, go to step 2.

- a. *If YES*, does the **continuity of coverage rule** apply? This rule allows some employees to retain their previous retirement coverage while in an appointment excluded by regulation. The employee must have been covered under a CSRS or FERS and must have moved into the excluded appointment (by transfer, rehire or conversion) with no break in service (a break of 3 days or less). If the requirements are met, the employee retains their previous retirement coverage, whether or not the new appointment is excluded from coverage. If continuity of coverage applies, the employee retains the previous coverage. **Stop here.**
- b. If the continuity of coverage does not apply, and the appointment is excluded from both CSRS and FERS, they will be covered by **FICA only**. **Stop here.**

OR

- c. If continuity of coverage does not apply, and the appointment is excluded from CSRS, but not from FERS (Term, TAPER or Indefinite appointments), apply the 5-year test to see whether the employee will be FICA only with a 6-month opportunity to elect FERS, or whether they will be automatically placed in FERS. *Go to step 4.*

STEP 2: Does the employee have PRIOR FERS coverage (once FERS always FERS)?

If NO, go to step 3.

If YES, coverage is FERS. Also, verify that the employee was properly placed in or elected FERS during a prior appointment. If an error in coverage exists, see additional guidance in this guide. **Stop here.**

STEP 3: Is the employee subject to SOCIAL SECURITY COVERAGE? This determination is based on the employee's service history.

a. Was the employee **first hired** in a **covered appointment** on or after January 1, 1984?

OR

b. Was the employee **rehired** after a break in **covered service** of more than 365 days, which ended on or after January 1, 1984? A break in covered service begins the day after an employee separates from a covered appointment and ends on the day the employee returns to a covered appointment. For simplicity purposes, use the date the employee returned to duty. FICA service in between these dates is counted as a break in covered service.

Example: Computing the length of a break:

Service History		Compute the Break	
07/20/79	Career Conditional Appointment	85-10-21	Break ended
06/14/83	Resignation	- 83-06-15	Break began
10/21/85	Converted Career Appointment	02-04-06	Total break

If NO, to both questions, the employee retains CSRS coverage and has a 6-month opportunity to elect FERS coverage. Stop here.

If YES to either question, the employee is subject to Social Security. Go to step 4.

STEP 4: Does the employee meet THE 5-YEAR TEST? The 5-Year Test determines whether an employee will be placed automatically in FERS. If the 5-year test is met, the employee is vested in CSRS and retains the right to continue coverage under CSRS. If the 5-year test is not met, the employee will be placed automatically in FERS.

When applying the 5-year test, remember to include all potentially creditable civilian service (listed below).

The retirement coverage determination will be correct even though the employee may never take all the actions needed for the service to become fully creditable. Be sure to compute the length of each period of service, do not guess, or “eyeball” appointment and separation dates to determine the amount of creditable service.

Potentially Creditable Civilian Service

- All deposit and redeposit service
- All LWOP up to 6 months in a calendar year
- All LWOP covered by Office of Worker’s Compensation Program (OWCP).
- If separated from Federal service and covered by OWCP, the OWCP time is only creditable if the employee is reemployed.
- Military service is considered potentially creditable civilian service only when an employee properly exercises restoration rights after return from LWOP/Separation for military service under Chapter 43 of Title 38.

Step 4 (Continued) The 5-Year Test - There are two parts to the 5-year test which are:

- a. Does the employee have 5 years of potentially creditable civilian service as of December 31, 1986?** *(Always apply this part first for all employees requiring a coverage determination.)*

If NO, and the employee also **had a break in service** that ended after December 31, 1986, (count any break in service of more than 3 days), ***go to Part B.***

If NO, and the employee **did not have a break in service** (more than 3 days) ending after December 31, 1986, the employee will be automatically covered by FERS. **Stop here.**

If YES, the employee is vested in CSRS and will not have automatic FERS coverage. If the appointment is not excluded from CSRS coverage (see Step 1), they will have CSRS Offset with a 6 month opportunity to elect FERS. If the appointment is excluded from CSRS, the employee will be FICA only with a 6 month opportunity to elect FERS. **Stop here.**

- b. Does the employee have 5 years of potentially creditable civilian service as of the last break in service and some prior CSRS or FSRDS covered service?**

If NO, the employee will be automatically covered by FERS. **Stop here.**

If YES, the employee is vested in CSRS and will not be automatic FERS coverage.

If the appointment is not excluded from CSRS coverage, they will have CSRS Offset with a 6 month opportunity to elect FERS. If the appointment is excluded from CSRS, the employee will be FICA only with a 6 month opportunity to elect FERS. **Stop here.**

Conner v. OPM: Before January 21, 1997, OPM applied Part B of the 5-year Test first. Any employee with a break in service of greater than 3 days ending after December 31, 1986, needed to have at least 5-years of potentially creditable civilian service and at least one day of prior CSRS or FSRDS coverage to avoid being placed automatically in FERS.

The Conner decision (issued by the U.S. Circuit Court of Appeals) changed how we apply the 5-year test. Now, the 5-year test is always first applied as of December 31, 1986 (Part A), whether or not there was a break in service ending on or after December 31, 1986. If the employee does not meet Part A of the 5-year test, and they had a break in service ending after December 31, 1986, they have a chance of meeting Part B of the 5-year test. Employees placed automatically in FERS during a period in which they should have been given the opportunity to elect FERS (under the rules prior to the Conner decision or because of another retirement coverage error) must be notified that they may **deem FERS** coverage, or indicate in writing that they wish to be placed retroactively in the correct retirement system.

**Coverage Determination Table
For
FIRST HIRES**

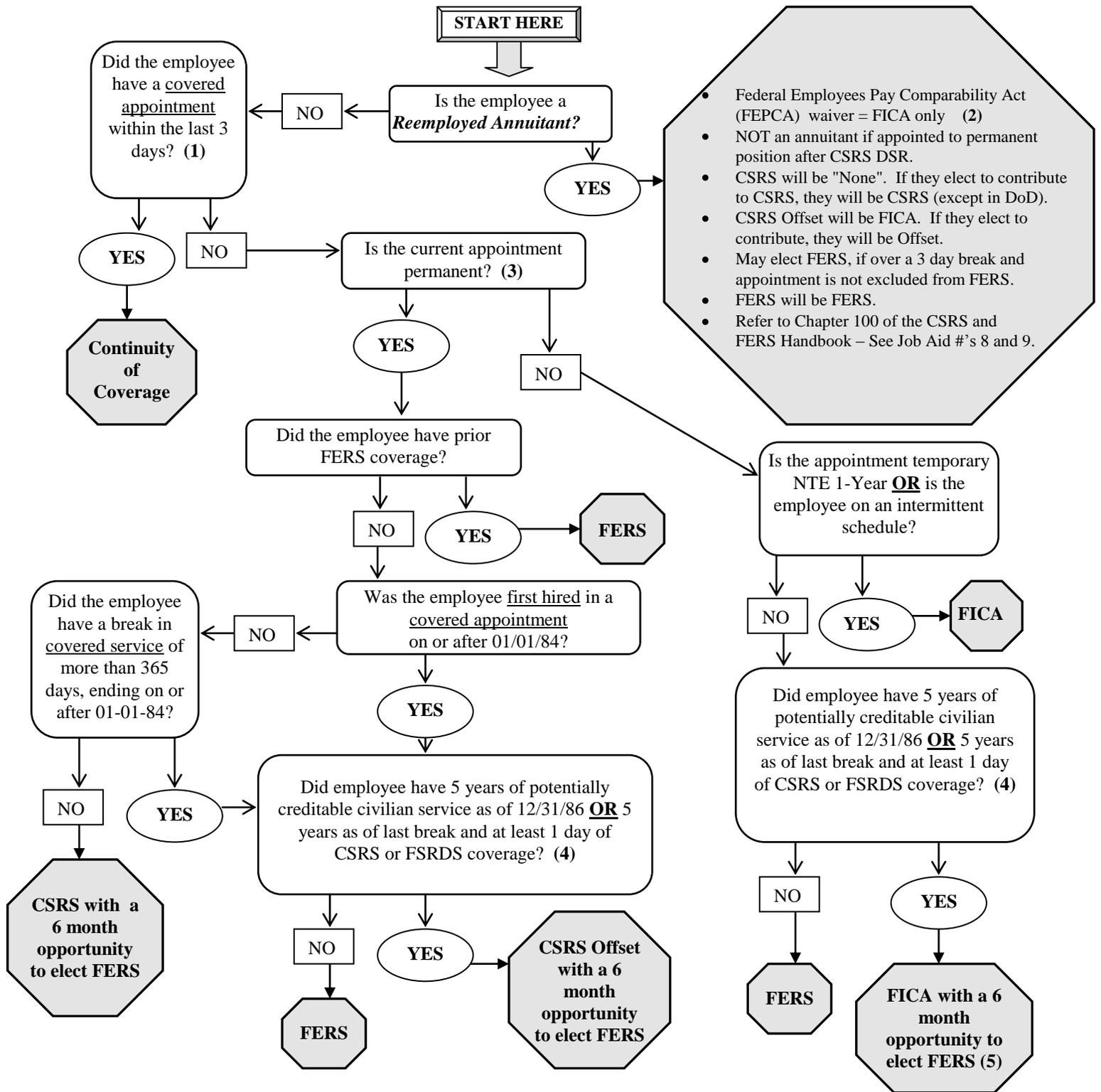
STEP	DECISION FACTOR	IF YES...	IF NO...
1	Does employee have prior non-Federal service that was covered by or creditable under CSRS? (For example, DC Government employee hired before 10/01/87)	Go to Step 2	Go to Step 5
2	Does employee meet 5-Year Test?	Go to Step 3	Coverage under FERS
3	Is current appointment excluded from CSRS?	Go to Step 4	Coverage under CSRS – Offset with option to elect FERS
4	Is current appointment excluded from FERS?	Coverage under FICA only	Covered by FICA with option to elect FERS
5	Is appointment excluded from FERS?	Coverage under FICA only	Coverage under FERS

**Coverage Determination Table
for
REHIRES**

STEP	DECISION FACTOR	IF YES...	IF NO...
1	Does employee qualify as a senior official?	See section 10A1.3-6C	Go to Step 2
2	Was employee previously covered by FERS?	Skip to Step 9	Go to Step 3
3	Was employee first hired after 12/31/83?	Skip to Step 9	Go to Step 4
4	Is current appointment temporary NTE 1 year or intermittent and not career or career conditional?	Coverage under FICA only	Go to Step 5
5	Is employee's current appointment excluded from CSRS?	Go to Step 6	Go to Step 7
6	Does employee meet the 5-Year Test?	FICA only with option to elect FERS	Coverage under FERS
7	Is employee now subject to Social Security (FICA) based on his/her service history?	Go to Step 8	Coverage under CSRS with option to elect FERS
8	Does employee meet the 5-Year Test?	Coverage under CSRS Offset with option to elect FERS	Coverage under FERS
9	Is the current appointment temp NTE 1 year or intermittent and not career or career conditional?	Coverage under FICA only	Coverage under FERS

**Coverage Determination Table
For
TRANSFERS & CONVERSIONS**

STEP	DECISION FACTOR	IF YES...	IF NO....
1	Does employee quality as a senior official?	See section 10A1.3-6C	Go to Step 2
2	Was last employment under another Federal retirement system (e.g. FSRDS)?	Skip to Step 5	Go to Step 3
3	Was last appt covered by Social Security (FICA) only?	Skip to Step 4	Employee retains previous coverage
4	Did employee previously have FERS coverage?	Skip to Step 11	Go to Step 5
5	Was employee first hired after 12/31/83?	Go to Step 11	Go to Step 6
6	Is the current appointment excluded from both CSRS and FERS?	Employee covered under FICA only	Go to Step 7
7	Is the current appointment excluded from CSRS?	Go to Step 8	Go to Step 9
8	Does employee meet the 5-Year Test?	Employee covered under FICA only w/option to elect FERS	Employee covered under FERS
9	Is the employee now subject to FICA based on his/her service history?	Go to Step 10	Employee covered under CSRS with option to elect FERS
10	Does employee meet the 5-year test?	Employee covered under CSRS Offset w/option to elect FERS	Employee covered under FERS
11	Is the current appointment temp NTE 1 year or intermittent and not career or career cond	Employee covered under FICA only	Employee covered under FERS



(1)	An employee on LWOP will return to the same retirement system with a 6 month election opportunity. A covered employee will return to the same retirement system <i>with</i> an opportunity to elect FERS: when the full period of separation was covered by OWCP <i>or</i> when the employee exercises restoration rights after a period of military separation (see Title 38 U.S.C. Chapter 43 for restoration requirements).
(2)	If a FEPCA waiver is approved by OPM, the annuitant will be FICA only and salary will not be offset.
(3)	Permanent appointment means an appointment that is NOT time limited.
(4)	FSRDS stands for Foreign Service Retirement and Disability System.
(5)	An employee will have only one FERS election opportunity during a continuous period of employment.

Retirement Coverage for Employees with Prior D.C. System Coverage

The District of Columbia's Police and Firefighters' Retirement and Disability System (D.C. System) covers both municipal employees (for example, D.C. police officers) and Federal employees (certain Secret Service and U.S. Park Police employees).

Generally, the retirement coverage determination steps are used for employees previously covered by the D.C. System. To make a correct Social Security coverage determination you must distinguish between municipal (city) service and Federal service under the D.C. System. To apply the 5-year test properly, you must also know whether the employee retired under the D.C. System or not.

The following pages outline the retirement coverage determination steps for employees with prior D.C. System coverage. Use Part I (below) for municipal employees and Part II for Federal employees.

Part I – D.C. MUNICIPAL EMPLOYEES with Prior DC System Coverage

D.C. Police Officers and D.C. Firefighters are municipal (city) employees. Service as a D.C. municipal employee is **not** considered service as a Federal employee.

When a D.C. municipal employee is hired into the Federal service, you must review the individual's service history to determine if they had prior Federal service. If the D.C. municipal employee had a **Federal** appointment not subject to Social Security coverage (i.e., CSRS or FSRDS) within the last 365 days, they will not be subject to Social Security. If they did not have a CSRS or FSRDS appointment within the last 365-days, the D.C. municipal employee is subject to Social Security and the 5-year test will be applied to determine whether the employee is CSRS Offset or automatic FERS.

When applying the 5-Year Test, the separation from D.C. municipal service is considered a break in service, even if the actual break in service is less than 4 days. Once an employee **retires** under the DC System, the D.C. System service cannot be used for the 5-year test. The service used to meet eligibility for the D.C. System annuity or compute the District of Columbia Police Firefighter System (DCPFS) annuity is not potentially creditable under CSRS or FERS because they cannot take a refund of their contributions and make a deposit under CSRS or FERS.

Part I – D.C. MUNICIPAL EMPLOYEES Retirement coverage steps:

Step 1 The current Federal appointment is excluded from CSRS and FERS (such as, Temp NTE 1 Year): FICA only coverage.

Step 2 The employee had FERS coverage in a prior Federal appointment: FERS, unless the current Federal appointment is excluded from FERS coverage (see Step 3).

Step 3 The current Federal appointment is excluded from CSRS, but not FERS: Go to Step 5 and apply the 5-year test to determine if the employee will be FICA only or automatic FERS.

Step 4 The current Federal appointment is not excluded from CSRS or FERS:

Determine Social Security Coverage: The employee is excluded from Social Security coverage if they had a Federal appointment not subject to Social Security coverage (i.e., a Federal appointment under: the D.C. System without concurrent Social Security coverage, CSRS, or FSRDS) within the last 365-days.

- The employee is excluded from Social Security: CSRS, with the opportunity to elect FERS
- The employee is subject to Social Security: Go to Step 5 and apply the 5-year test to determine whether employee will be CSRS Offset or FERS.

Step 5 Apply the 5-Year Test -- Did the employee have at least 5-years of potentially creditable civilian service as of 12/31/1986; **OR** did the employee have at least 5-years of potentially creditable civilian service as of the last break in service and at least 1 day of CSRS or FSRDS covered service?

NOTES: If the employee is retired under DC System, the service used in the DC System annuity cannot be used in the 5-Year Test. The separation from D.C. municipal service is considered a break in service for the 5-year test, even if the actual break was less than 4 days.

- Yes, the 5-Year Test is met:
 - a. The employee's current appointment is **excluded** from CSRS: FICA only, with the opportunity to elect FERS.
 - b. The employee's current appointment is not excluded from CSRS: CSRS Offset, with the opportunity to elect FERS.
- No, the 5-Year Test is not met: Automatic FERS

Part II – FEDERAL EMPLOYEES with Prior D.C. System Coverage

Certain Federal employees, such as certain members of the **Uniformed Division of the Secret Service or U.S. Park Police**, are covered under the D.C. Police and Firefighters System (D.C. System). These employees are Federal employees, not D.C. municipal employees.

To determine the retirement coverage for these employees, you must know whether the employee retired or whether the employee was covered by the D.C. System and Social Security concurrently.

If the Secret Service or U.S. Park Police employee is **not retired** under D.C. System, the Social Security rules are applied to determine whether they will be subject to Social Security coverage in the new appointment. If the employee moves from a D.C. System appointment not subject to Social Security coverage within 365 days, they continue to be exempt from Social Security and would be subject to CSRS coverage. If the employee is not exempt from Social Security (because of a break in service of more than 365 days or prior service covered by the D.C. System and Social Security concurrently), or if the employee is on an appointment excluded from CSRS, the 5-Year Test will be applied.

If the Secret Service or U.S. Park Police employee has **retired** under the D.C. System not subject to Social Security, generally, they remain excluded from Social Security coverage on future Federal appointments. If their new Federal appointment is not excluded from CSRS coverage, they can acquire CSRS coverage in their new appointment.

If the appointment is excluded from CSRS and FERS retirement coverage, they will be FICA only. If the appointment is excluded from CSRS, but not FERS, the 5-Year Test is applied to determine whether they will be FERS or FICA only. If retired under the D.C. System, the D.C. System service cannot be used for the 5-Year Test. The service used to meet eligibility for the D.C. System annuity or compute the D.C. System annuity is not potentially creditable under CSRS or FERS because they cannot take a refund of their contributions and make a deposit under CSRS or FERS.

PART II – FEDERAL EMPLOYEES Retirement coverage steps

Step 1 The current Federal appointment is excluded from CSRS and FERS: FICA only coverage.

Step 2 The employee had FERS coverage in a prior Federal appointment: FERS, unless the current Federal appointment is excluded from FERS coverage (see Step 3).

Step 3 The current Federal appointment is excluded from CSRS, but not FERS: Go to Step 5 and apply the 5-year test to determine if the employee will be FICA only or automatic FERS.

Step 4 The current Federal appointment is not excluded from CSRS or FERS:

Determine Social Security Coverage: The employee is excluded from Social Security coverage:

a. If they had a Federal appointment not subject to Social Security coverage (i.e., a Federal appointment under: the D.C. System without concurrent Social Security coverage, CSRS, or FSRDS) within the last 365 days.

OR

b. If the Federal employee **retired** from the D.C. System (without concurrent Social Security coverage).

- The employee is excluded from Social Security: CSRS. Note: If the employee has had break in service of more than 3 days, they will have a 6 month opportunity to elect FERS.
- The employee is subject to Social Security: Go to Step 5 and apply the 5-year test to determine whether employee will be CSRS Offset or FERS.

Step 5 Apply the 5-Year Test -- Did the employee have at least 5-years of potentially creditable civilian service as of December 31, 1986; **OR** did the employee have at least 5-years of potentially creditable civilian service as of the last break in service and at least 1 day of CSRS or FSRDS covered service? **NOTE: If the employee is retired under D.C. System, the service used in the D.C. System annuity cannot be used in the 5-year test.**

- Yes, the 5-Year Test is met:

- a. The employee's current appointment is **excluded** from CSRS: FICA only.
Note: If the employee has had break in service of more than 3 days, they will have the opportunity to elect FERS
 - b. The employee's current appointment is not excluded from CSRS: CSRS Offset, with the opportunity to elect FERS.
- No, the 5-Year Test is not met: Automatic FERS

Retirement Coverage Determinations Made on January 1, 1987

FERS became effective on January 1, 1987. With the establishment of FERS, employing offices were required to determine which retirement system would cover CSRS Interim employees, and employees serving under appointments excluded from CSRS coverage but not FERS (i.e., Term, Taper, or Indefinite appointments):

- CSRS Interim employees with less than 5 years of creditable civilian service on December 31, 1986 (those who did not meet the 5-year test), were automatically converted to FERS.
- CSRS Interim employees who met the 5-year test were placed in CSRS Offset with a 6 month opportunity to elect FERS. These employees were also eligible to elect FERS under the extended 1988 FERS Open Season.
- Employees who were excluded from CSRS but not from FERS (i.e., employees on Term, Taper, and Indefinite appointments) who did not meet the 5-year test were automatically covered under FERS.
- Employees who were excluded from CSRS but not from FERS (i.e., employees on Term, Taper, and Indefinite appointments) who met the 5-year test were covered under FICA only with a six month opportunity to elect FERS.
- Employees who were **first hired** on or after January 1, 1987, were automatically covered by FERS, unless their appointment was excluded by law or regulation.

FERS Election Opportunities

There have been two FERS Open Seasons, the original FERS Open Season (July 1, 1987 through December 31, 1988), and the 1998 FERS Open Season, (July 1 - December 31, 1998).

Employees may also have a **6 month opportunity to elect FERS** based on an appointment or action, such as:

- Employees rehired after a break in service of more than 3 days into an appointment not excluded from FERS. This includes employees previously covered by CSRS, CSRS Offset, and employees on appointments excluded from CSRS but not FERS.
- Employees who return to duty following a break in service during which they were receiving OWCP benefits (even though the period of separation is considered a leave of absence for retirement purposes).

- Employees, who meet the 5-year test, who are converted from appointments excluded from FERS to appointments not excluded from FERS.
- Employees who separated from their civilian position to perform military service and who exercised their restoration rights under Chapter 43 of title 38 U.S.C.

An eligible employee may elect FERS coverage during the **6 month period** following the date he or she first becomes subject to an appointment described above. An employee may have more than one opportunity to elect FERS during their career. Employees have a new opportunity to elect FERS each time they return to the Federal service after a break in service of more than 3 days, or fall under one of the categories described above. However, employees only have one FERS election opportunity during a continuous period of service. (See Chapter 11 of the CSRS and FERS Handbook for further information on FERS Elections.)

When an employee has a FERS election opportunity, you must give them a copy of the FERS Transfer Handbook, or provide access to the Handbook and OPM resources on the FERS Election Opportunities web page http://www.opm.gov/fers_election.

Note: An employee may withdraw or cancel a FERS election, if the action has not yet become effective. Once the action is effective, it is irrevocable and cannot be voided by the agency or OPM.

Belated FERS Elections

Normally, an agency can accept a belated FERS election, within the 6 months following the end of the employee's initial 6 month election period. The decision to accept a belated FERS election is up to the agency. Elections are effective prospectively.

The exception to the rule is the 1998 FERS Open Season. There is no regulatory time limit for belated 1998 FERS Open Season elections. You can accept these elections, if the agency decides that the SF 3109, the FERS Transfer Handbook were not provided, or if there are circumstances beyond the employee's control that prevented them from making a 1998 FERS Open Season election in a timely manner.

Killip vs. OPM – After the 1987 FERS Open Season, many employees recognized that FERS was possibly a good system for them. At that time, employees could write to OPM and request a retroactive transfer to FERS. If the employee stated that they did not make a FERS election during the Open Season due to reasons beyond their control (no information, bad information, etc.), OPM allowed the correction of records and retroactive transfers in many cases.

However, in 1993, the United States Court of Appeals for the Federal Circuit determined that OPM did not have the authority to allow retroactive belated FERS elections made after June 30, 1988, even when the employing office provided incomplete information to the employee, or when circumstances beyond the employee's control prevented them from making an informed election.

Section IV – Auditing Employee Records & Correcting Coverage Errors

Audits of Official Personnel Folders (OPF) and Merged Records Personnel Folders (MRPF) are essential in determining retirement coverage.

Employing offices should establish a system for auditing OPFs for retirement coverage. OPFs for all rehired and transferred employees should be audited as soon as possible after receipt. In particular, coverage determinations for employees who had creditable civilian service before 1984 **and** who have had one or more breaks in service or changes in types of appointments may be susceptible to errors.

Each of the following steps is important and provides a basis for a thorough and accurate audit for retirement coverage determinations.

Procedures to Follow when Auditing OPFs/MRPFs:

1. Check the employee's OPF/MRPF for a FERS election.

- Look for a SF 50 showing action code 803/Chg in Retirement Plan and a retirement code of K, L, M, or N;
- Or the OPF copy of a FERS election on OPM Form 1563 or SF 3109.

2. Compile an employment history, listing the employee's personnel actions and retirement coverage.

- List all potentially creditable civilian service.
- List military furlough time, but do not include other military service.

3. Verify Coverage.

- Use the appropriate coverage determination table (i.e., New Hire, Transfer/Conversion, or Rehire) to make a decision about coverage for each appointment action.
- If your coverage determination does not match the previous determination, verify with the employee that the service history you have is correct and complete. The staff of the Benefits & Entitlements Branch is available to assist you in making these determinations.
- If you determine that an error has been made, initiate appropriate actions to correct the error.

Employment History Worksheet

Name:					
Action	Type of Appointment	Effective Dates		Break in Service	FERS
		To	From		

ITEM	DESCRIPTION
Action	Type of personnel action taken (e.g., transfer, conversion) as indicated on SF 50.
Type of Appointment	Type of appointment (e.g., excepted service, career-conditional) as indicated on SF 50.
Effective dates	Effective dates of personnel actions.
Break in service	Note each break in service, and its length. Also note if break is: 3 days or less or is over 365 days (may result in OASDI coverage).

FERS	If an employee has a break of 4 days or more on or after July 1, 1987, has not previously acquired FERS coverage, and is not now excluded from FERS, he or she has a 6 month opportunity to elect FERS. An employee, who transfers or converts from an appointment excluded from FERS to one that is not, also has a 6 month opportunity to elect FERS. The receipt copy or the OPF copy of the SF 3109 or (formerly OPM Form 1555) is documentation that this opportunity was given.
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Section V - Correcting Retirement Coverage Errors

The **Federal Erroneous Retirement Coverage Corrections Act (FERCCA)**, Public Law 106-265, was enacted to address the long-term harm to retirement planning created when employees are put in the wrong retirement plan.

FERCCA made significant changes in the way retirement error corrections are processed. Error correction procedures are different, depending on the type of retirement coverage error involved. Because **error correction procedures are expected to change in the near future**, it is important to keep up to date by monitoring the Benefit Administration Letters (BALs) and the FERCCA web site (<http://www.opm.gov/benefits/correction>). Register with the OPM Benefits Info List, at <http://www.opm.gov/benefits/correction/listserv.htm> to receive automatic updates by e-mail.

FERCCA primarily benefits employees with retirement coverage errors that have lasted for at least 3 years of service after December 31, 1986. However, it also changed some of the procedures for correcting retirement coverage errors where an employee is in FERS by mistake and can choose to stay in FERS. These are sometimes called "deemed FERS" elections (see 5 CFR §846.204(b)(2)).

FERCCA may provide an employee one or all of the following:

- An opportunity to choose another retirement plan
- Reimbursement for certain out-of-pocket expenses paid as a result of a coverage error
- Benefits from certain changes in the rules about how some of their Government service counts toward retirement:

FERCCA changed the service credit rules for employees who owe deposits or redeposits for military or civilian service that they performed before the coverage error. The employee can still pay the deposit or redeposit under normal rules.

However, if the employee does not pay the military or civilian deposit or redeposit, the

military or civilian service will be used in the computation of the employee's retirement benefit and the retirement benefit will be actuarially reduced based on your age and the amount owed at time of retirement.

- The ability to make-up Thrift Savings Plan (TSP) contributions and get lost earnings on those contributions:

Employee TSP contributions, and associated earnings, made while the employee was erroneously covered under FERS may remain in their TSP account. If the employee declines FERS coverage, agency contributions made during the period of erroneous FERS coverage, and associated earnings, must be removed from the employee's TSP account. Although FERCCA allows payment of lost earnings on employee make-up TSP contributions in some situations, it does not permit payment of lost earnings when the employee was erroneously placed in FERS.

Not all employees will have a choice of retirement plans under FERCCA.

An employee WILL NOT have a choice in retirement coverage under FERCCA if:

- The agency corrected the employee's records to FERS when it discovered an error and the employee later separated and took a refund of all FERS retirement deductions
- The agency corrected the employee's records to FERS when it discovered an error and the employee chose to withdraw their TSP contributions
- The employee received a payment ordered by a court or provided as settlement of a claim for losses resulting from a retirement coverage error. The employee may not make an election under FERCCA unless they repay the amount received or OPM waives repayment
- The employee was put in FERS by mistake and was previously given the opportunity to stay in FERS, or the opportunity to be placed retroactively in the correct retirement plan (a deemed FERS election)
- The error involves Social Security coverage and must be corrected:

The employee is in:	And belongs in:	Coverage must be corrected to:
CSRS Offset	CSRS	CSRS*
CSRS	CSRS Offset	CSRS Offset

Social Security-Only	CSRS	CSRS*
	CSRS Offset	CSRS Offset
	FERS	FERS

- The SSA will allow the CSRS employee Social Security credit for all but the last 3 years before the retirement coverage was corrected.

An employee WILL have a choice of retirement coverage under FERCCA if:

If the employee is in:	And belongs in:	The employee may choose between:
CSRS or CSRS Offset	FERS	CSRS Offset and FERS
	Social Security only	CSRS Offset and Social Security-only
FERS	CSRS	FERS and CSRS*
	CSRS Offset	FERS and CSRS Offset*
	Social Security only	FERS and Social Security-only*

* An employee who has already been given a deemed FERS election opportunity will not have an opportunity to change their election under FERCCA.

FERCCA Errors – As discussed above, FERCCA covers all errors that lasted for at least 3 years of service after December 31, 1986.

Follow OPM correction procedures for FERCCA errors. If the employee is retiring within a month, please call your agency liaison at OPM for advice. In most cases, OPM will ask you to flag the record (a sample flag is attached to BAL 00-113) and send them the retirement package without correcting the error.

Deemed FERS Elections – FERCCA affected the way we process retirement coverage corrections where an employee is in FERS by mistake and can choose to stay in FERS (deemed FERS elections).

If you discover an error that lasted for **less than 3 years** where the employee was automatically put in FERS and should have been put in CSRS, CSRS Offset, or Social Security (FICA) only with a 6 month opportunity to elect FERS coverage, you must give the employee an opportunity to retain FERS coverage (a deemed FERS election) or be changed to the correct retirement coverage.

Although the CSRS and FERS Handbook has procedures for correcting deemed FERS errors, it has not been updated to reflect the FERCCA changes. Therefore, you should follow the correction procedures specified in BAL 02-103.

Other Retirement Coverage Errors – You can process a correction for any retirement coverage error that lasted for less than 3 years of service after December 31, 1986.

Follow OPM correction procedures. BAL 02-103, Attachment 1, provides detailed instructions about correcting errors involving erroneous FERS coverage. Step 5A, provides instructions for correcting errors in which the employee would not have had a FERS election opportunity, and the error lasted for less than 3 years. Step 5B provides instructions for correcting errors in which the erroneous FERS coverage has lasted for less than 6 months and the employee would have had a FERS election opportunity.

While the following table does not reflect every action that is necessary to correct a retirement system error, it provides a general overview of the major steps required.

Office	Retirement Coverage Corrections - Actions/Responsibilities
<p style="text-align: center;">Personnel</p>	<p>Contact the Employee</p> <ul style="list-style-type: none"> • Provide complete information concerning when the error was made, the impact of the error, any decisions which must be made by the employee, and an estimated timeframe for correcting the error. <p>Correct the OPF</p> <ul style="list-style-type: none"> • Prepare a 002/correction SF 50 to correct most recent action on which erroneous retirement code appears, and show correct code in block 30. Use remarks C11 (and C12 if error appears on more than one SF 50). (See subchapter 32 of the Guide to Processing Personnel Actions.) <p>Distribute corrected SF 50's</p> <ul style="list-style-type: none"> • Provide a copy to the individual • File a copy in the OPF • Promptly provide a copy to the supporting DFAS payroll office
<p style="text-align: center;">DFAS</p>	<ul style="list-style-type: none"> • Corrects the SF 2806 or SF 3100 • Issues corrected W-2 forms for each year the error occurred (this is how the Social Security account is corrected for the employee) • Distributes funds to the IRS • Initiate TSP account corrections

Office	Retirement Coverage Corrections - Actions/Responsibilities
	<ul style="list-style-type: none"> • Holds any excess funds in abeyance (In the case of <i>James B. King, Director, OPM v. Merit Systems Protection Board 96-3012</i>, the board found that employees placed erroneously in CSRS rather than FERS or CSRS-Offset are not entitled to the money that should have been paid to Social Security. The court considers the funds involved in a retirement misclassification as a misappropriation of funds rather than a debt owed by the government to a former employee.)
<p style="text-align: center;">IRS</p>	<ul style="list-style-type: none"> • Receives money from DFAS • Disburses funds to OPM for placement in FERS or CSRS (as appropriate) • Disburses the funds to Social Security for errors less than 3 years old
<p style="text-align: center;">Social Security</p>	<ul style="list-style-type: none"> • Using the corrected W-2's for the year(s) the error occurred, SSA corrects the employee's record to reflect coverage under Social Security for all the years the employee should have had Social Security by law. Even though the error occurred, Social Security coverage cannot be waived or exceptions made
<p style="text-align: center;">NFC</p>	<ul style="list-style-type: none"> • The National Finance Center (NFC) processes corrections to TSP accounts
<p style="text-align: center;">Employing Activity</p>	<ul style="list-style-type: none"> • Pays the difference in the employer contributions for the entire time the error occurred • If the employee should have been in FERS or CSRS Offset, the employer must make a 6.2% contribution to Social Security
<p style="text-align: center;">OPM</p>	<p>If the individual has retired or separated, OPM will:</p> <ul style="list-style-type: none"> • Notify the annuitant or separated employee of the error • Notify the human resource office of the error • Return the SF 2806 or SF 3100 to the payroll office for correction (Because of downsizing and regionalization the annuitant's payroll office may have closed. When this situation occurs, the designated payroll office assumes the duties of the closed payroll office and makes the corrections.) • Continue interim pay for annuitants who remain eligible to retire, and adjust the amount of the interim pay, if necessary

5. Beginning Date: 06-21-80
 Ending Date: 04-15-85

85-04-15
 - 80-06-21
 04-09-25

Retirement System Codes

CODE	NAME	DEFINITION
1	Civil Service Retirement System (CSRS)	
2	Social Security System (FICA)	
3	Foreign Service Retirement and Disability System and Disability System (FSRDS or FS)	
4	None	No Federal Retirement System
5		Other retirement system (i.e., state government retirement system for National Guard Technicians, the Teacher Insurance Retirement Annuity Plan for professors at the Uniformed Services University of Health Sciences, the District of Columbia Police and Fireman's Retirement Fund for law enforcement officers of the Park and Secret Service, and the special withholding rate CSRS if selected by congressional record indexers at the Government Printing Office.
6	Civil Service Retirement - Special (CSRS-Special)	For law enforcement officers and firefighters
C	FICA and CSRS (Partial)	CSRS Interim or Offset
E	FICA and CSRS-Special (Partial)	CSRS Interim or Offset for law enforcement officers and firefighters
G	FICA and FSRDS (Partial)	
J	FICA and Other (Partial)	
K	FERS and FICA	
L	FERS and FICA - ATC	Air Traffic Controllers
M	FERS and FICA-Special	Law enforcement and firefighters
N	FERS and FICA - RT	Reserve Technicians
P	Foreign Service Pension System (FSPS) and FICA	
R	FICA and CSRS (Full)	For certain senior officials

T	FICA and CSRS - Special (Full)	For certain senior officials who are law enforcement officers or firefighters
X	FICA and Other (Full)	