



COBRA and HIPAA Procedures and Work Flow

Sold Case Submission - Group Enrollment

BRS will make available the Employer Services Agreement and Set-Up Checklists upon receipt of membership applications for groups of 2 or more. Alternatively, a broker may facilitate the completion of the Set-up Checklist and deliver the Employer Services Agreement to the group contact when initially signing a group up with BRS. Upon receipt of completed paperwork from members, BRS will forward the information to COBRA Outsourcing Company (COCO)/Payflex. All original group enrollment information should be sent to BRS.

New Group Installation

Once COCO has received the new business Set-up Checklist from BRS, COCO will build the Employer information in their systems. Once installed a COCO representative will contact the Employer to schedule a 20-minute installation conference call. During this call the website (cobra.payflex.com) will be reviewed as well as the duties of the employer. If members are not contacted within 30 days of paperwork submission to BRS, groups should contact BRS. BRS is making this service available, but the relationship is ultimately between members and COCO. BRS is not liable nor responsible for any aspect of the COBRA and HIPAA coverage, or groups that fail to enroll.

Takeovers of Pending or Enrolled Qualified Beneficiaries (QB)

During the installation call, a COCO representative will begin to organize information on any pending or enrolled Qualified Beneficiaries that need to be transitioned to the COCO system. If there are Takeovers, a form will be provided to the Employer with instructions on how to complete.

Current Employees

During the installation call, a COCO representative will begin to organize information on the current full time employees so their COBRA and HIPAA General Rights Notices can be sent by COCO. **(Please see Employer Services Agreement-Schedule A for additional fee).** A spreadsheet template will be provided to the Employer with instructions on how to complete and e-mail back to COCO for processing.

New Hires

After notifying the insurance carrier(s) of a new plan member, the Employer will also communicate to COCO, via cobra.payflex.com, the necessary information so a General Rights Notice can be provided to the new hire. Additionally, the Employer will notify COCO of any individual who has waived participation in Employer sponsored benefits coverage.

Qualifying Events

The employer is responsible for notifying the insurance carrier(s) of any coverage terminations due to a Qualifying Event. The Employer will also communicate to COCO, via cobra.payflex.com, the necessary information to process the COBRA event. Additionally, COCO will generate and send the HIPAA Certificate of Creditable Coverage to the Qualified Beneficiary.

COBRA Reinstatements & Terminations

If the Qualified Beneficiary elects and pays for COBRA continuation coverage within the election periods, COCO will contact the insurance carrier(s) to reinstate COBRA continuation rights. The Qualified Beneficiary will reappear on the Employer's Insurance bill. Additionally, COCO will terminate COBRA continuation rights directly with the insurance carrier. The employer should continue to pay their premium as billed. Any adjustments will appear on the next bill.

Premium Processing

COCO will invoice each enrolled Qualified Beneficiary for COBRA premium payments. Each premium invoice will instruct the individual to remit payment payable to COCO by end of the grace period. COCO will batch all premiums received on behalf of the Employer and remit one check back to the Employer for all monies received for the coverage month. **Please note: Due to federally mandated grace periods given to the Qualified Beneficiary, there may be a lag between the insurance premium due date and receipt by the employer of COBRA premium payments from COCO.**

Monthly Status Reports

On or about the 5th of each month, Status Reports are published to the COCO website. The Employer will receive an email message instructing them to retrieve and reconcile their reports against the carrier billings. Any discrepancies must be reported to COCO immediately. Reports are produced for the month just ending. For example, July reports are published on August 5th.