

BRS COBRA and HIPAA Procedures and Work Flow

New Group Installation

Once BRS has received the signed COBRA Agreement and Employer Application from members the Employer information will be entered into the COBRA system. Once set-up, BRS will send the group a confirmation and information which outlines the ongoing duties of the employer. If members are not contacted within 30 days of paperwork submission to BRS, they should contact BRS.

Current Employees & New Hires

The COBRA regulations require General COBRA notices be provided to all plan participants. This includes employees and dependents. If the employer has not consistently provided the required notification, BRS will provide the General COBRA notices to all participants. (Additional fees may apply- see Employer Services Agreement-Schedule A)

New plan members (new hires and/or new dependents) must be supplied with their General COBRA notices within 90 days of plan enrollment and it is the employer's responsibility to notify BRS.

A spreadsheet template will be provided to the Employer with instructions. This should be mailed or e-mail back to BRS for processing.

Takeovers of Pending or Enrolled Qualified Beneficiaries (QB)

If there are Takeovers, the employer must notify BRS and fill out a separate form which will be provided to the Employer with instructions on how to complete.

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 this Qualifying Event to BRS in writing, either via mail or at COBRA@brsvt.com. BRS will confirm receipt of all qualifying events. The notification to BRS will trigger the generation of the Specific Rights letter and COBRA election form. This letter includes a HIPAA Certificate of Creditable Coverage if the qualified beneficiary was enrolled on a medical plan at the time of the qualifying event.

COBRA Reinstatements & Terminations

If a qualified beneficiary elects COBRA and pays the required premium within the allotted grace period, BRS will notify the appropriate insurance carrier of the election. The qualified beneficiary will reappear on the carrier billing statement along with the employer's active employees. When a qualified beneficiary terminates from COBRA continuation, BRS will notify the appropriate carrier. The employer should always pay the carrier as billed. The carrier billing statement will reflect any retroactive premium adjustments regarding the elections and terminations.

Premium Processing

BRS will invoice each enrolled Qualified Beneficiary for COBRA premium payments. Each premium invoice will instruct the individual to remit payment payable to BRS by end of the grace period. BRS 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 reimbursements from BRS.**

Annual Plan Renewal

Cobra participants must be notified of any rate increases prior to the effective date of increase. COBRA premium may only be increased once during the 12-month determination period. Don't forget to notify us of any plan rate changes so that we are sure to bill the correct amount of COBRA premium. Federal regulations prohibit us from retroactively billing COBRA participants for plan rate changes that are given to us after the rate effective date. COBRA participants must be treated as similarly situated active employees in regards to Open Enrollment plan options and coverage level choices. Don't forget to send the same Open Enrollment materials to all pending and enrolled COBRA participants as you send to your active employees.

