

# CLIENT ADMINISTRATION MANUAL

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## BENEFIT CONTINUATION SERVICES



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# WELCOME!

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Congratulations on your new Benefit Continuation plan with TASC.

As a Benefit Continuation client, you are participating in a program that makes compliance with the complex rules of COBRA and state continuation easy and efficient. Please take time to familiarize yourself with the materials within this folder; they provide a comprehensive review of your plan.

This Administration Manual provides all of the guidance you need to properly manage your Benefit Continuation plan. You will also receive an invitation to attend a webinar or a one-on-one phone call. This will help educate you on the requirements necessary to keep your plan compliant and all the benefits we offer to help you do so.

In the meantime, if you have any questions pertaining to your Benefit Continuation plan, call us at 608-241-1900 or toll-free at 800-422-4661.

We look forward to serving you and your employees!



# Getting Started

## Benefit Continuation Service Sequence

To start your Benefit Continuation plan, please provide the following information to TASC:

- A completed *Premium Collection Form*.
- A completed *Employer Notice of a Takeover Qualifying Event Form* if there are any individuals currently on COBRA or any other type of continuation. We will notify these individuals that we are the new administrator.

Please take note regarding your plan start date reflected in the cover letter. TASC Benefit Continuation administrative services will begin on this date.

TASC does not perform functions that were the responsibility of the employer or previous administrator that were required prior to the plan start date. For example, TASC will not issue election offers for qualifying events that occurred on dates before the start of our administration.

Accurately completed forms are a vital component in the administration of COBRA continuation. Forms not fully or accurately completed will be returned to the employer. Forms will not be processed until all data is received.

Once the above information is received and processed, we begin management of your plan. Under COBRA regulations, generally the employer or the insurance carrier will distribute the COBRA General Initial Notice (GIN) required by Department of Labor (DOL) COBRA regulations.

If the insurance carrier does not send out this notice, TASC can send it out on your behalf. Employee demographic and plan start information needs to be entered online. See [Request a General Initial Notice](#) for instructions. Once this information is entered, TASC will send the GIN to newly benefit-eligible employees and any dependents.

When an employee experiences a qualifying event (also called an eligibility event), the employer must notify TASC within 30 days of the qualifying event. COBRA legislation requires that the employer notify the administrator of the following events:

- Termination
- Reduction of hours below the minimum required to participate in benefit plan(s)
- Death of the employee
- Divorce or legal separation
- Dependent child ceasing to be a dependent
- Employer's bankruptcy

### Note on Medicare

Although extremely rare, the employer must also notify the administrator in the event of Medicare entitlement (enrollment) if loss of eligibility occurs as a result of the enrollment. Most often, employees choose to drop coverage in favor of Medicare. However, this is not a COBRA qualifying event even if that decision results in loss of coverage for a spouse or dependent. Only if your group health plan forces individuals off coverage onto Medicare would Medicare enrollment be a COBRA qualifying event; furthermore, having such a policy is a violation of Medicare Secondary Payer rules. For that reason, Medicare enrollment is almost never a COBRA qualifying event.

If the employer notice to the administrator is received beyond the 30-day requirement, the employer assumes any penalties incurred. If the employer notice to the administrator is well beyond 30 days, special handling will be necessary. TASC may advise employers to seek the assistance of an experienced benefits attorney.

The continuee or other qualified beneficiary must notify the administrator of the following events:

- Divorce or legal separation
- Dependent child ceasing to be a dependent
- Other secondary qualifying events (some secondary qualifying events mean a change in premium; employers should verify correct premiums with their carriers)

To notify TASC that a qualifying event has occurred, sign into your account and enter the qualifying event online. See [Add a Qualifying \(Eligibility\) Event](#) for instructions.

As a backup, a *Qualifying Event Notification Form* is available; however, we strongly encourage you to utilize the web portal for faster processing and ease of use.

Once the qualifying event has been received, TASC will send COBRA Election Notices to the qualified employee and dependents. For other types of continuation, different election notices can be sent that do not mention COBRA. You will not be sent a copy of this notice, but after processing, you may view the notice on the employee's **Letters** area online.

Once the employee experiences a qualified event which would trigger loss of coverage, the employer should terminate the employee's coverage with all applicable carriers.

For benefit plan reinstatement, continuees electing continuation are asked to complete the notice or elect online. Under federal COBRA law, continuees have 60 days from the date of the notice or the loss of coverage date, whichever is later, to make an election. Election and payment time frames may be different for state continuation and other types of continuation administration. Once an election and initial payment are made, TASC notifies the employer by email within 48 hours of receipt. The employer should reinstate the employees retroactive to the original loss of coverage date. TASC does not communicate with the insurance carrier regarding enrollments or terminations.

Under COBRA law, payments are due by the first of the month for that month of coverage, with a 30-day grace period for payments not received by the first. For other types of continuation, payment time frames may be different. If payment is received after the close of the grace period, a letter will be sent to the continuee and the employer notifying them that the employee is terminated from coverage.

TASC charges COBRA continuees an additional 2% above the premiums for handling the payments. This 2% fee is maintained by TASC. Other types of continuation may have different rules for payment handling fees; those fees are also maintained by TASC.

If a participant's payment is returned by the bank due to insufficient funds or otherwise and the premium amount has been forwarded to the employer, the employer will be responsible for returning the premium amount to TASC. In addition, TASC reserves the right to require a participant to make payment with a cashier's check or money order if a previous check has been returned by the bank due to insufficient funds or otherwise.

# Account Management

## Renewal

It is vital that employers notify TASC 60 days prior to any rate increases to ensure timely communication to current continuees. The *Premium Collection Form* may be used to communicate these changes. TASC will send a letter regarding the rate change to the continuees.

To maintain compliance with federal law, TASC requires that any changes in rates must be submitted to TASC by the 15th of the month prior to the effective date. Failure to supply any changes in rates by this deadline will result in a delay of the effective date for the rate change. If received after the 15th of the month prior, implementation will be delayed at least until the first of the month following the month for which rates were received.

TASC cannot charge participants for retroactive premium changes. If you fail to communicate any changes in rates before TASC's deadline, you may have to pay the premium difference to your carrier. TASC will not have any liability for any losses in premium differences due to a Plan Sponsor's failure to communicate rate changes or corrections to TASC in a timely manner.

At the renewal of the plan subject to COBRA, the employer should treat COBRA continuees in kind with active employees, ensuring that the continuee receives all necessary enrollment forms and/or premium change notification. This does not hold true if the COBRA continuation has expired.

As an example, rates received January 20 will generally be effective no earlier than March 1.

## Reporting

To receive 24/7 access to critical data on your continuation participants, sign into your account to view a variety of reports to assist you with needed information. Please do this often to track your continuation participants.

Upon continuation election and termination, you will receive email notification of these events; however, it is your responsibility as the client to review the website for other needed information. See the tabs on each employee's record for detailed information.

While TASC performs administration services for continuation, you are ultimately responsible for ensuring the accuracy of carrier records each month. You must review the reports we have available and reconcile that information with the data held by your carriers. Reports include the following:

- Continuation ACA. Individual data that may be needed for Affordable Care Act (ACA) reporting purposes.
- General Initial Notice Substantiation. Gives name and demographic data for those sent this important COBRA document.
- Coverage Change. A summary of all additions, terminations, and changes.
- Payment Account Summary. Gives participant name, continuation status (pending, active or terminated), individual payment dates and amounts, active benefits, and paid through dates.
- Plan Structure. A configuration summary of your payment plans and corresponding data sets that should be used when submitting data files.

While we will provide prompt, accurate and complete data, it is not possible for TASC to provide concessions indefinitely even in situations when we were found to be in error. To maintain a productive, effective relationship and minimize expense in our mutual continuation administration, please monitor our communications and respond promptly and completely.

You are obliged to maintain up-to-date contact information online; this includes email and mailing addresses and phone numbers. TASC periodically sends important plan notifications regarding balances, deadlines, and/or plan changes. We are not responsible for any consequences resulting from communications not received due to inaccurate contact information.

You are ultimately responsible for ensuring the accuracy of carrier records each month.

# Account Management

## Premium Disbursements

Premium payments received from participants are posted to your Remittance Account. This posting is normally scheduled for the 7th of each month for premiums received up to the date of remittance, including all funds received to that point for the previous calendar month's (and any earlier month's) obligations. Weekends, holidays or other circumstances may affect the timing.

Only the amount currently due for a participant will be remitted. Any prepayments or overpayments will be held and applied to future remittances.

If a participant payment is rejected for non-sufficient funds (NSF) that amount will be subtracted from your Remittance Account balance and/or next remittance. If there are not sufficient funds to cover the returned payment, you will be asked to return a portion of a prior distribution.

Funds posted to your Remittance Account are held there until you move them. You may do this by scheduling a recurring ACH transfer to a bank account on file or requesting a check disbursement to an address on file. See [Remittances](#) for instructions.

Please note you, the client, are the default payee for transfers from your Remittance Account.

To change the payee to your TASC Distributor/broker or another business entity, submit a support request that includes the payee name (to whom checks should be made payable) and mailing address.

Due to the special reporting required, adding or changing the payee to a carrier is a Premium Service, which carries an additional fee. Contact your TASC Distributor for assistance.

## Mailing

Timely communication is a critical component of all continuation administration. TASC will communicate enrollments and terminations to the employer on a timely basis. Employers must notify TASC within 30 days of a qualifying event. If this is not done, TASC maintains the right to refuse the notice and to decline services to that continuee.

A few additional items should be stressed:

- To determine if Notifications and Elections are received or sent within the appropriate time frames, U.S. postmark dates will be used.
- All communication sent from TASC will be sent via first class mail.
- All communications will be sent to the last known address on record. It is vital that employers notify TASC immediately of a change of address or if an alternative address should be used.
- Mail returned due to an unknown address will not be resent.
- TASC will send all participant communications directly to the continuee. Employers will not receive copies, though all documents are available for view in the employee's Letters area in your online account.



## Liability For Non-Compliance

Substantial penalties and excise taxes can be assessed at \$110 per day per violation with limits as high as \$500,000 for non-compliance with COBRA and/or state laws. With COBRA, although it affects insurance, is an employer law. The employer has certain responsibilities under COBRA and the employer is liable for COBRA failures. Were there to be a failure in COBRA law compliance, several different entities may levy penalties including the IRS and DOL. Penalties could include claim payments to qualified beneficiaries, court levied damages, attorney fees, and ERISA claims. Likewise, state Departments of Insurance and other entities enforce compliance with state continuation laws that may apply to you.

In addition, the IRS regularly performs audit procedures for COBRA compliance. Therefore, the employer and TASC must maintain a significant and credible paper trail of compliance documentation. Liability between the employer and TASC is “hand-in-hand.” The employer’s liability will reside in areas of continuation administration under their control and management. TASC liability will rest in the areas of third-party administration responsibilities.

Substantial penalties can be assessed for compliance violations.

## HIPAA Compliance

Provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) apply to the offerings you purchase from TASC. Authoritative information regarding the requirements of HIPAA is available to clients with TASC’s HIPAA Compliance offering. For more information, please visit our website at [www.tasconline.com](http://www.tasconline.com).

# Confidentially Speaking Program

The Confidentially Speaking program guarantees that TASC employees, customers, and vendors can safely and anonymously communicate with management regarding sensitive information.

## Why did TASC implement this program?

A renewed interest in corporate governance, spurred by the Sarbanes-Oxley Act, has motivated many organizations to implement an anonymous reporting hotline. Because TASC's Confidentially Speaking system helps employees, customers, and vendors voice their opinions and concerns, we're able to gain valuable feedback that otherwise might not be forthcoming. Finally, besides helping our efforts to mitigate risk, this information helps us maintain an ethical environment within TASC.

As part of our organization's core values and best practices, we expect to conduct business in a legal and ethical manner. We do not condone any illegal or unethical behavior. All members of our TASC team are asked to let us know immediately if they become aware of unacceptable activity occurring within the organization. TASC management in turn takes steps to appropriately address the issue.

## How Does it Work?

If you have knowledge about the occurrence of unethical activity, promptly report the situation to a Confidentially Speaking representative via website or phone. You may remain 100% anonymous, no matter the method of reporting.

**Reporting via website:** [tasconline.ethicspoint.com](https://tasconline.ethicspoint.com)

The user-friendly website makes reporting easy. It walks you through each step of the reporting process, which includes answering a few questions required as part of the feedback collection process. You may also upload supporting documents to the website.

If you wish to receive follow-up information, you may do so in two ways. You may create a custom website password to allow you to check the case status and communicate anonymously. Or, you may provide an email address to receive follow-up information anonymously.

**Reporting via phone:** 844-716-1734

If you would rather call, a highly trained representative will thoroughly interview you. It is advantageous to be as up front as possible with the interviewer. Once the report/call is complete, you will receive a unique code related to your report which will allow you to check the case status and/or to follow-up on the matter.

## After Reporting

The issue will be investigated and escalated as necessary and appropriate. Besides helping our efforts to mitigate risk, this information helps us maintain an ethical environment within TASC. Comments and feedback are taken seriously and may directly affect the success and culture of our organization.

Confidentially Speaking is administered by NAVEX Global, an independent organization that is contractually forbidden to disclose your personal information to TASC.

### Possible Categories of Unacceptable Activities and Unethical Behavior

- » Accounting, Auditing and Financial Concerns
- » Conflict of Interest, Falsification of Information
- » Release of Proprietary Information Fraud, Deceit, and Embezzlement
- » Security Violations
- » Theft, Safety Concerns, Company Policy Violations

# Business Processing Event Timeline

	<b>Event</b>	<b>Duration</b>	<b>Responsibility</b>
1	Submit TASC Purchaser Details with fees	Varies	Distributor
2	TASC receives and previews TASC Purchaser Details	2+ days (if clean)	TASC
3	TASC enters the new business	1+ days	TASC
4	TASC sends a welcome email to client with instruction on how to register for a webinar or schedule a one-on-one education call	3 days	TASC
5	Client attends webinar or participates in education call	Varies; dependent on client schedule	TASC/Client
6	Enter client information to establish the client account	1 day	TASC
7	Receive completed <i>Premium Collection Form</i> and Takeover Qualified Beneficiary (TQB) information	Varies	Client
8	Process the TQB information and send notification of the change in continuation administration	7-14 days	TASC

# TASC Invoicing Practices

## Purpose

TASC's invoicing practices aim to foster a clear understanding by communicating expectations to all clients and distributors, ensuring compliance to TASC plans and offerings, creating consistency between all of TASC's divisions, and ensuring the continuation of services.

## Philosophy

To ensure that TASC operations continue to run smoothly, various actions need to occur in a timely manner, including the payment of TASC administrative fees. Paying in advance demonstrates that the plan is for the benefit of employees, provides further evidence that the plan has been established on a pre-thought basis, and ensures coverage under TASC's Audit Guarantees. TASC invoices in advance for two reasons:

- » TASC requires a commitment in advance of the business being processed; and
- » TASC requires a payment history for its clients, so as to determine the clients' status of good standing.

## Types of Payments

- **Check.** Clients may pay by check.
- **E-Pay.** Clients may pay administrative fees electronically as long as they use E-Pay, and as long as these fees are debited seven (7) days prior to their service period start date. Therefore, if a service period begins January 1, clients will be debited on December 23.
- **ACH Credit.** Clients may pay administrative fees or funding invoices via an electronic ACH Credit transfer. A \$40 per transaction service charge will be assessed. Clients should contact their distributor for details.

- **ACH Debit.** Clients may pay administrative fees or funding invoices via an electronic ACH Debit transfer.

## Types of Invoices

- **Administration Fee.** Remitted annually. Exceptions can be made on a case-by-case basis for monthly or quarterly schedules.
- **Premium Services Fee.** This invoice is generated when a client has elected a Premium Service.

## Standard Procedures Across all Divisions

- **Invoice.** Generated and sent forty-five (45) days prior to the service period start. Because the service of your TASC COBRA coverage begins before the plan start date, TASC invoices 45 days prior to the plan start date.
- **Due Date.** Will be seven (7) days from the date the invoice was generated.
- **Service Charge Date.** An additional \$20 fee will be assessed sixty (60) days from the original invoice date if the invoice is not paid by the service charge due date, and the account will be placed on hold.
- **Statement.** A statement (second notice) of unpaid invoices will be mailed fifteen (15) days prior to the start of the service period.
- **Past Due Email Notification.** On the first day of the service period or forty-five (45) days after the original invoice date (whichever comes first), an email will be sent to any account with unpaid invoices older than forty (40) days. This email will inform the client that the account will be put on hold and that a \$20 service fee will be charged if the invoice is not paid within sixty (60) days of the original invoice issue date.
- **Final Notice Statement.** A final notice statement (third notice) will be mailed out fifteen (15) days

into the service period, with a service charge of \$20, a notice of “default” status, and a notice that all account services have been placed on hold.

- **Collections.** The account will be placed in collections forty-five (45) days into the service period start, or ninety (90) days after the original invoice date, whichever comes first.
- **Plan Termination.** The account will be terminated one hundred and four (104) days into the service period start. Letters will be provided to each client being terminated.
- **Fee Calculations.** Fees are calculated on the number of known healthcare enrolled employees at the time the invoice is generated. Administration fees are either the minimum fee or the number of participants multiplied by the per-participant fee, whichever is higher. If the number of participants is unknown the minimum fee will be charged.

## Client Responsibilities

Administration fees are the responsibility of the client.

Mail invoices and payments to:

**TASC - Client Invoices**  
**PO Box 88278**  
**Milwaukee, WI 53288-0001**

- All invoice payments must be submitted separately from all other payments and transactions.
- All invoice payments must be made separately (*i.e.*, one check with one invoice).
- Notify TASC of any disputes or any changes.
- Please make your checks for administrative fees payable to TASC. Checks incorrectly issued to TASC can delay the administration of your plan.

## Other Fees

- When establishing a Benefit Continuation plan, all clients are assessed a one-time initial enrollment fee of \$100. Should the client have multiple locations, each location is assessed a \$100 enrollment fee. The setup fee is due with the completed TASC Purchaser Details.
- TASC assesses a one-time takeover fee of \$30 per takeover qualified beneficiary for assuming continuation administration responsibilities for current and notified continuation beneficiaries. This fee is due at the same time as the initial enrollment fee.
- Qualified COBRA beneficiaries submitting their insurance premiums for processing to TASC will be assessed a 2% administration fee. Other continuation participants will be assessed fees in other amounts, depending on the applicable account offering. This fee is the responsibility of the qualified beneficiary. With subsidized coverage, this fee will be calculated based on the original premium amount and assessed to the client in the case of fully subsidized coverage, or in the case of partially subsidized coverage, to the qualified beneficiary unless TASC is directed otherwise by the client.

# ONLINE ACCOUNT GUIDE

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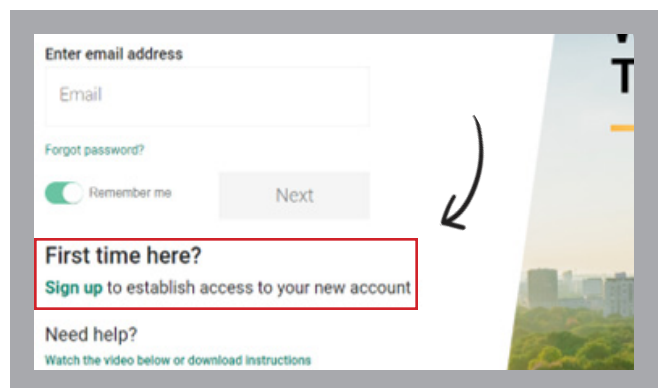
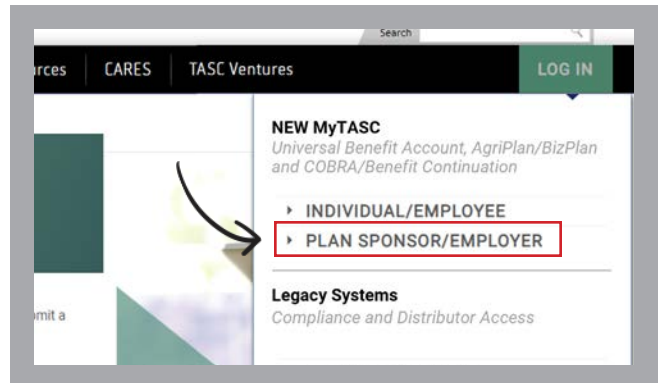
## Sign Up / Sign In

This section covers how to establish access to your new account and manage your payment plans and employees. Please note, Google Chrome is the preferred web browser for client account access.

To access your Benefit Continuation plan online, go to [www.tasconline.com](http://www.tasconline.com) and select the **LOG IN** button on the menu bar in the upper right. On the drop-down list, click the **PLAN SPONSOR/EMPLOYER** option.

The first time you access your plan online, you will need to complete the **Sign Up** process. On the **Sign In** page, below **First time here?** click **Sign Up** to establish access to your new account.

Enter your email address and create a password, then follow the on-screen instructions to complete the process. Once you've done that, you can return to the **Sign In** page and enter your new credentials to access your account.



## Overview

Your **Overview** page lets you access all the tools you need to manage your Benefit Continuation plan.

**OVERVIEW**

Alerts Settings Support Contact Us Cary ▾

OVERVIEW EMPLOYEES OFFERINGS FUNDING FILES BILLING REPORTS

**\$0.00**  
Yellow Ridge Resort - BAM + B...  
Cash Account Available Balance

**EMPLOYEES**

Search By Name ...

Add Employee

Add Event

**PLANS**

Plans (2)	Active	Employee Contribution	Employer Contribution	Expenditures	Remittance
09/19 - Health... Plan started on: 03/01/2	1	\$2,700.00	-	-	-
BCS-COBRA	-	-	-	-	-

## View Payment Plans

From the **Overview** page, select **Offerings** from the top menu and then select **View Plans** from the drop-down list. You will be able to view the payment plans that may be offered to your continuation participants.

To the left of each plan listed, under **Actions**, you will find a “snowman” icon (three vertically-aligned dots). Click an icon to view the **Plan Summary**, **Eligibility** and **Pricing** for that plan.

From the left navigation menu, choose **Pricing** to view the rates that have been entered for the plan.

Select **Overview** from the top menu to return to the **Overview** page.

**PLANS**

Select Plan Start Year: 2023 Status

Actions	Plan Name	Employees	Status	Plan Start Date
⋮	09/19 - Healthcare FSA	1	Active	03/01/2023
⋮	HMO 750		Active	03/01/2023
⋮	WEST COBRA		Active	03/01/2023
⋮	BCS Immersion - LOA		Deleted	01/01/2023

**PRICING MODEL**

Effective Date: 04/01/2023 Price Model Options: Tier

Total: 1 of 1

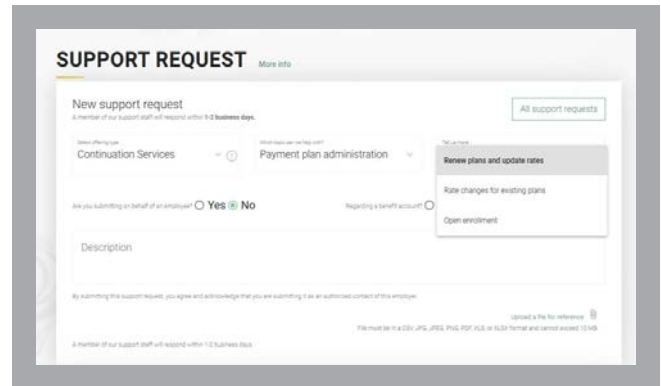
**PRICING TABLE**

TIER	PRICE	FEES	TOTAL PRICE
EE + 1	\$1,000.00	\$0.00	\$1,000.00
Family	\$1,500.00	\$0.00	\$1,500.00
Single	\$500.00	\$0.00	\$500.00

## Add a Payment Plan

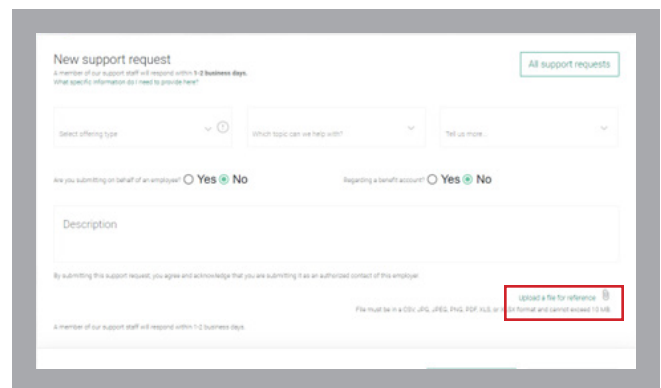
To add a plan, click **Support** at the top of the **Overview** page. Follow the prompts to create a support request.

Select **Continuation Services** for the offering type, then **Payment plan administration**. To submit new plans, choose **Renew plans and update rates**. To submit plan corrections, choose **Rate changes for existing plans**.



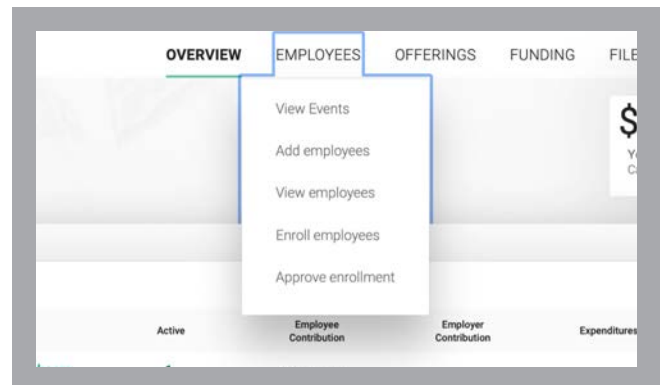
Use the **Upload a file for reference** link to attach a completed *Premium Collection Form* and any rate sheets you have received from your carrier so that we have complete information and can ensure accurate entry of the plan's parameters.

A support request ensures that we have easy, secure access to your submitted documents, contextualized to your account.



## View Employees

Select **Employees** from the top menu and select the **View Employees** option in the drop-down menu. You may search the list by **Employee Name** or **TASC ID** and filter the results by **Employment Status** or **Class** if desired.

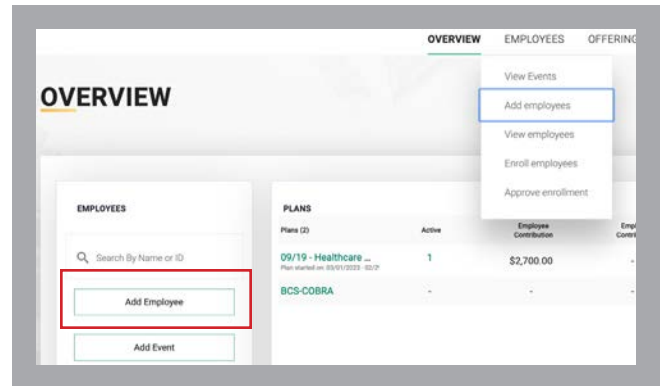




## Add Employees

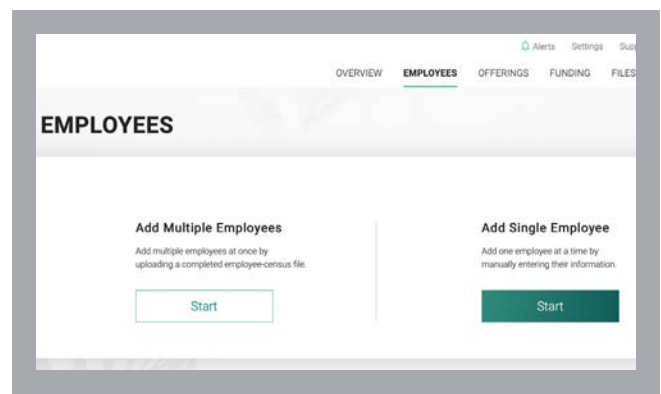
You can add an employee directly from the **Overview** page by clicking the **Add Employee** on the left side of the screen.

You can also select **Employees** from the top menu and then click the **Add Employees** option in the drop-down menu.



Click the **Start** button under **Add Multiple Employees** on the left side of the screen to upload a census file with information for multiple employees.

Uploading a file ensures that we have easy, secure access to your submitted documents, contextualized to your account



To manually enter one employee's information, click the **Start** button under **Add Single Employee** on the right side of the screen.

To be able to search by **Employee ID** or see an **Employee ID** on reports, or if your carriers require an **Employee ID** as an identification number, be sure to enter one during this step.

The same applies for **Division**, **Subdivision** and **Class**.



**If any of these options are not available for selection, please contact us for assistance.**

Click **Add** when the entry is complete.

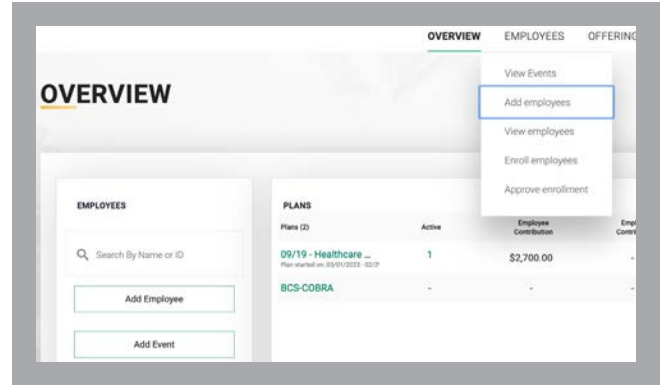
If there are dependents that should be associated with the employee, you can add those records when requesting a **General Initial Notice**.

A screenshot of the 'ADD EMPLOYEE' page. The page title is 'ADD EMPLOYEE'. Below the title, there are two steps: '1 Personal Information' and '2 Employment Information'. The 'ADD A NEW EMPLOYEE' form is displayed, featuring several input fields: 'ZIP code', 'First Name', 'Middle Name (optional)', 'Last Name', 'Date of birth' (with a calendar icon), and 'Gender' (with a dropdown arrow). A red error message 'Date of birth is required.' is visible below the 'Date of birth' field.

## Request a General Initial Notice

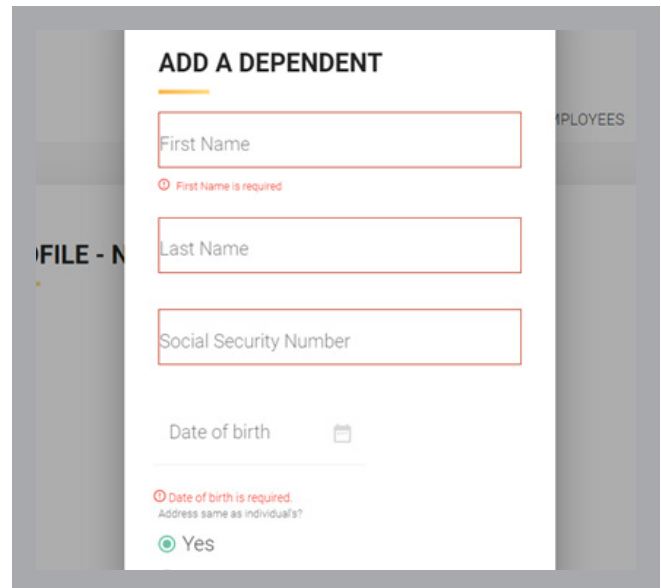
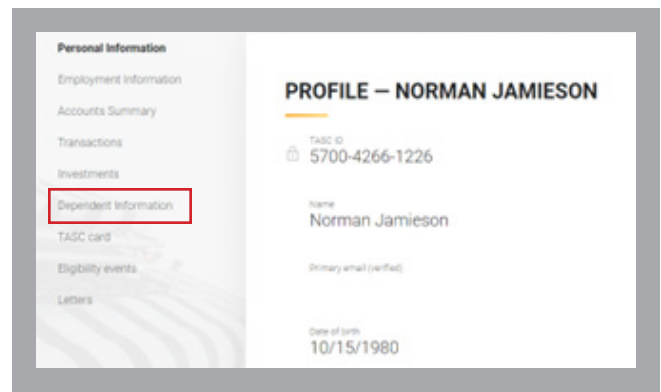
To request that a **General Initial Notice of COBRA Rights (GIN)** be sent for any individual on your list of employees, first ensure that the employee's information has been entered. Complete the **Add Employee** process outlined above, if necessary.

On the **Overview** page, click **Add Event** on the left side of the screen, or search your list of employees and click that employee's name.

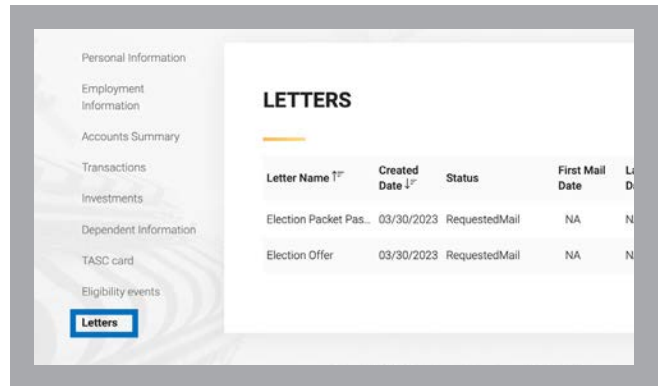


From their **Profile**, click **Dependent Information** in the left navigation menu to add any dependents, if necessary.

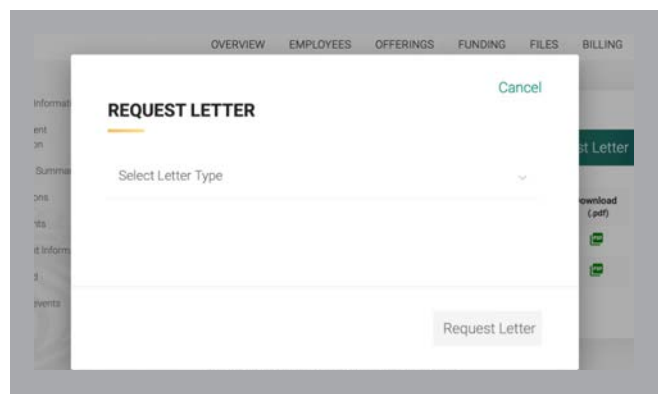
Please note that spouses are required to receive their own GIN, either by addressing a joint envelope to them or by sending them a separate notice if they live at a different address than the employee.



From the employee's **Profile**, click **Letters** in the left navigation menu.



In the **Request Letter** modal, select **General Initial Notice** from the **Letter Type** drop-down menu and click the **Request Letter** button. This will return you to the **Letters** screen and the GIN will be displayed.




## Add a Qualifying (Eligibility) Event

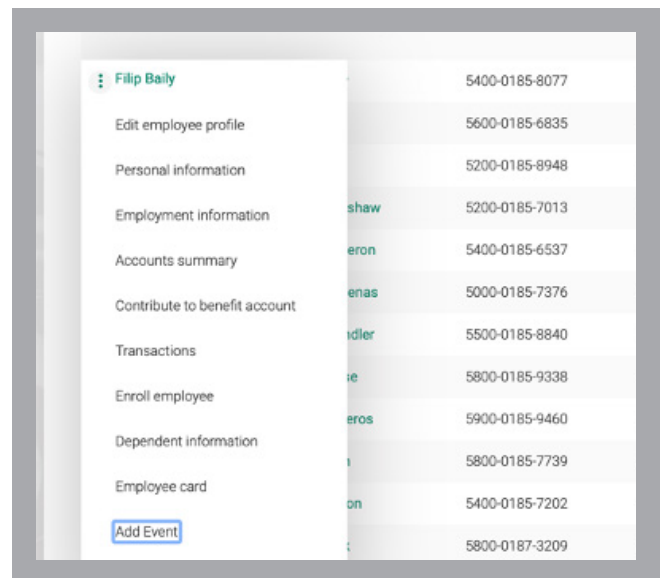
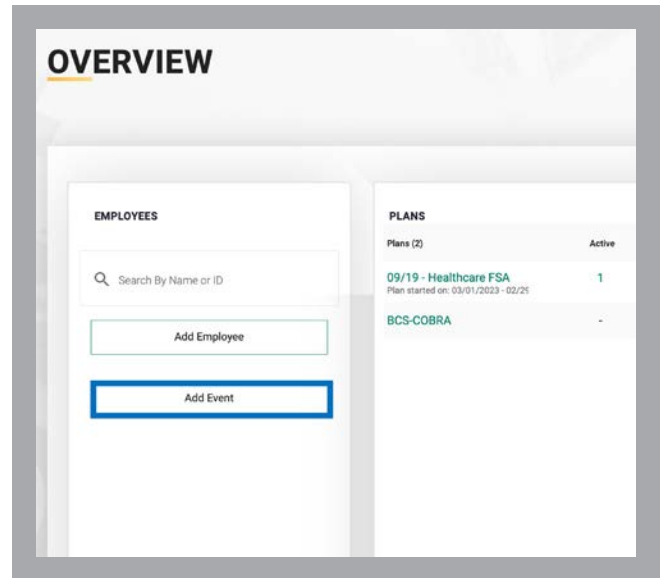
If a COBRA qualifying event has occurred, a COBRA election notice must be sent. If another kind of eligibility event has occurred that entitles an employee to a continuation offer, election notices may be needed, depending on the setup of your plans.

To request that a COBRA election notice or other offer be sent, first ensure that the employee's information has been entered. Complete the **Add Employee** process outlined above, if necessary.

Click that employee's name on the list to display their information. Confirm that the records are accurate, including any dependent entries. If necessary, add dependents as described in the section above.

On the **Overview** page, click **Add Event** on the left side of the screen, or search your list of employees and click that employee's name.

 When an eligibility event occurs, use the **Add Event** process outlined here to enter the individual's event information and initiate a continuation offer. **To terminate the employee's participation in any TASC benefit plans, the Remove Employee function must also be used.**



There are five steps to entering an event.

**ADD EVENT**

1 Demographic Information  
2 Dependent information  
3 Event Details  
4 Eligible Plan  
5 Review

**DEMOGRAPHIC** [Edit Information](#)

Name  
Norman Jamieson

Date of birth  
10/15/1980

Gender  
Male

Address  
2302 International Lane, Madison, WI 53704

[Cancel](#) [Next](#)

First, confirm the demographic information for the employee.

Next, review or add dependent information. For COBRA purposes, all individual dependents must be added. Click **Next** if no dependents exist.

In the **Event Details** step, click the **Event Type** drop-down menu to view the list of event types that are available. Choose the event that applies, enter the **Qualifying Event Date** and indicate who incurred the event, then click **Next**.

1 Demographic Information  
2 Dependent Information  
3 Event Details  
4 Eligible Plan  
5 Review

**EVENT DETAILS**

Event Type  
Involuntary Termination

Qualifying event date  
05/01/2023

Incurred by  
Filip Bailly

In the **Eligible Plan** step, click the **Add Plan** button to see the list of available plans.

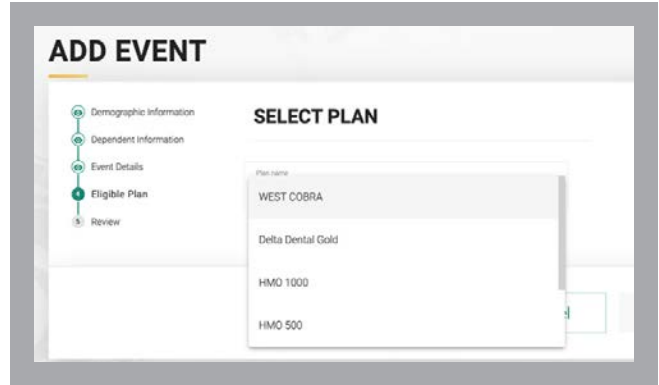
**ELIGIBLE PLAN**

There are no plans yet. Select Add Plan to add an eligible plan for the employee.

[Add Plan](#)


[Back](#) [Next](#)

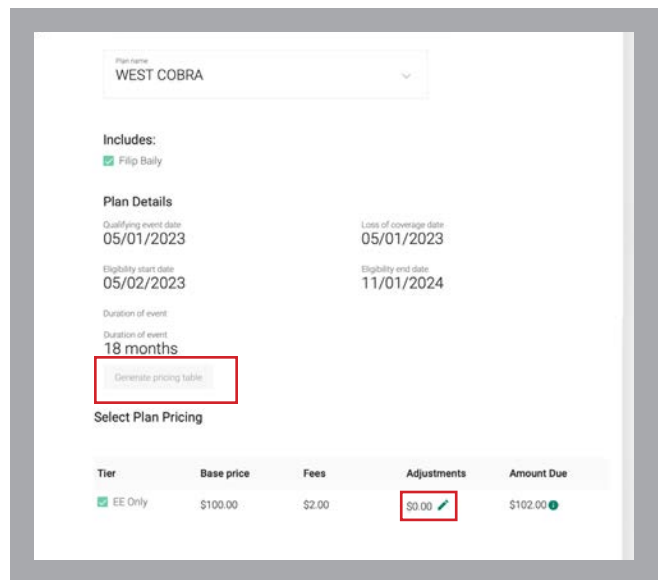
Select all plans that should be offered. If a plan to be offered is not listed, you will need to cancel the event entry and contact TASC to resolve the issue.



After selecting the plan(s), you can review the dates involved in this offer. If any are incorrect, you will need to cancel the event entry and contact TASC to resolve the issue.

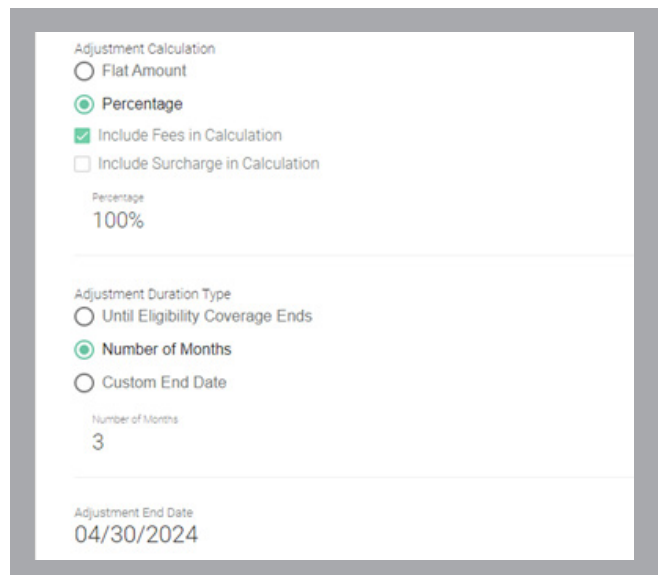
If the dates are correct, click **Generate Pricing Table** to see the premium that will be charged.

To enter a subsidy that will reduce the premium owed for each coverage level, click the  icon to the right of an amount under **Adjustments**.



Select whether the subsidy is a flat amount or percentage of the total due. For percentage adjustments, also indicate whether administrative fees should be subsidized.

Specify the duration of the subsidy and confirm the adjustment end date, then click **Save**.



Continue to add all plans that should be offered to the employee and their dependents, indicating who had coverage for each plan individually.

If there are multiple subsidized levels of coverage to be offered, you will need to repeat the adjustment process for each.

You will have an opportunity to review the entire entry. If correct, click **Validate and Submit Offer**.

After a short delay, documents will be generated that reflect your entry. To see the documents, follow the instructions below.

Plan Name	Qualifying Date	Loss of Coverage	Eligibility Start	Eligibility End	Status
WEST Medical	05/01/2023	05/01/2023	05/02/2023	11/01/2024	Included

Buttons: Back, Validate And Submit Offer

## Viewing Employee Information

To view detailed information on the plans that are in effect for employees and their dependents, select **Employees** from the top menu on the **Overview** page and select the **View Employees** option in the drop-down menu. Locate the employee on your list and click the **:** icon to the left of their name below **Actions**.

You can view the employee's **Account Summary**, **Transactions**, **Dependent Information** and more.

Actions	First name ↑	Last name ↑
:	Filip	Baily
:	Arjun	Ball
:	Callan	Bell


To view the letters that have been sent to the employee and their dependents, select **Letters** from the left navigation menu. You can view and download each document.

Letter Name ↑	Created Date ↓	Status	First Mail Date	Last Mail Date	Sent To	Download (.pdf)
Election Packet Pas...	03/30/2023	RequestedMail	NA	NA	Filip Baily	
Election Offer	03/30/2023	RequestedMail	NA	NA	Filip Baily	

Buttons: Request Letter

## Remittances

To schedule a transfer of funds posted to your **Remittance Account**, select **Transactions** from the top menu on the **Overview** page and then **Remittance**.

In your **Remittance Account**, you will see the funds collected for the period preceding the date the remittance was run, designated by carrier. To view individual transactions that comprise a posting, click the  icon to the right of that row.

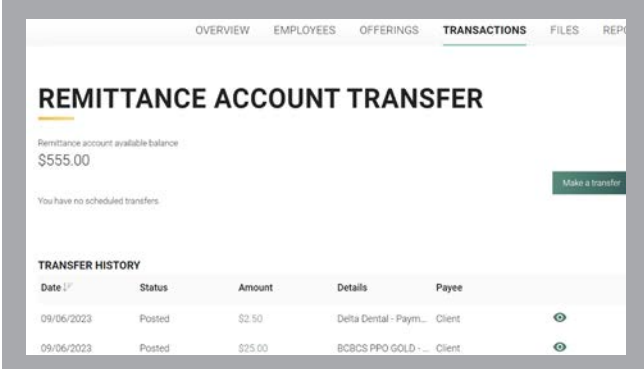
To transfer funds, click the **Make a Transfer** button.

Select the Frequency (the default is **Monthly**) and click **Next**.

Enter a **Start Date** when you would like automatic transfers to begin. Then, either enter an **End Date** when you would like automatic transfers to stop or check the **No End Date** box to have automatic transfers continue indefinitely.

Select the day of the month that you want the transfer to occur. Please be aware that while remittance funds are usually posted to your **Remittance Account** on the 7th of each month, the timing may be affected by weekends, holidays or other circumstances.

Add a **Transfer Note** and click **Next**.



OVERVIEW EMPLOYEES OFFERINGS **TRANSACTIONS** FILES REPORTS

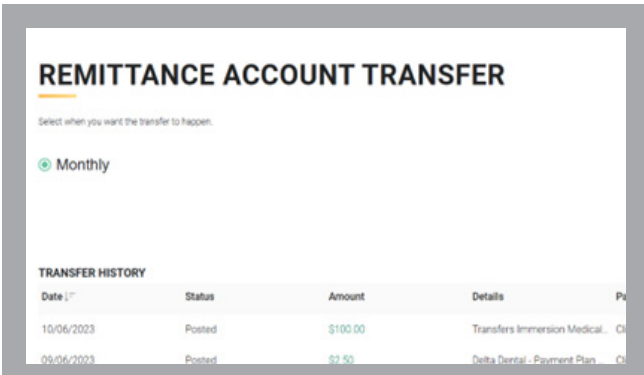
### REMITTANCE ACCOUNT TRANSFER

Remittance account available balance  
\$555.00

You have no scheduled transfers.

**TRANSFER HISTORY**

Date	Status	Amount	Details	Payee	
09/06/2023	Posted	\$2.50	Delta Dental - Paym...	Client	
09/06/2023	Posted	\$25.00	BCBS PPO GOLD - ...	Client	



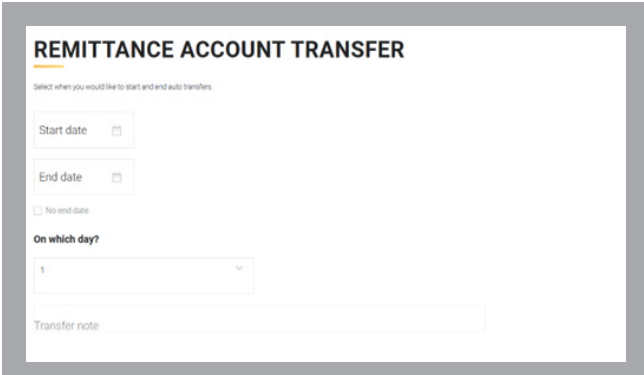
### REMITTANCE ACCOUNT TRANSFER

Select when you want the transfer to happen.

Monthly

**TRANSFER HISTORY**

Date	Status	Amount	Details	Payee
10/06/2023	Posted	\$100.00	Transfers Immersion Medical...	Client
09/06/2023	Posted	\$2.50	Delta Dental - Payment Plan	Client



### REMITTANCE ACCOUNT TRANSFER

Select when you would like to start and end auto transfers.

Start date

End date

No end date

On which day?

1

Transfer note



Select how you would like to receive your transfer and click **Next**. For your convenience we recommend transferring funds to your bank account on file; this is the fastest, most secure way to receive your funds.



To add a bank account, complete an *ACH Authorization for Remittance Account Transfer Form* and submit via support request. **To add a payee that is a separate business entity, TASC Distributor/broker, or carrier, additional information is needed.** See [Premium Disbursements](#) for details.

Select the amount to be transferred (the default is your full available balance; minimum \$25) and click **Next**.

Review the transfer details. If all details are correct, click **Confirm**, or use the **Back** button to go back and make changes.

### REMITTANCE ACCOUNT TRANSFER

Select how you would like to receive transfer.

**New Account**  
Ending in 1033

**Check**  
54321 American Lane, Schenectady, NY 12345

### REMITTANCE ACCOUNT TRANSFER

Select how much you want to transfer.

**Remittance account available balance**  
\$655.00

**Transfer Amount**

**Full Available Balance**  
(minimum transaction \$25)

### REMITTANCE ACCOUNT TRANSFER

Please review transfer details.

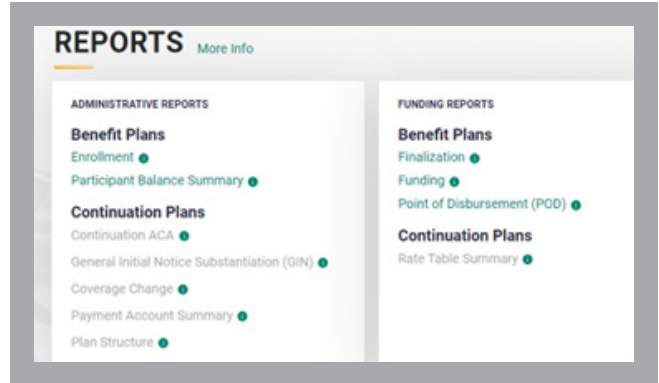
How Often	Monthly
How to receive	New Account Ending in XXX1033
On what day	The 1st of every month
First transfer on	12/01/2023
Transfer amount	Full Available Balance

It will take 7-10 business days to mail a check.

## Reports

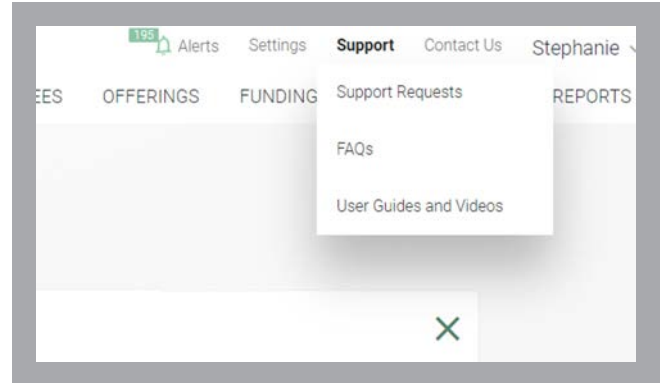
To access reports for your TASC offerings, select **Reports** from the top menu. Reports that are provided without special request are listed by date order. See the documents listed under the **Continuation Plans** headings.

Click the **i** icon next to any report for a brief description.



## Support

Select **Support** from the top menu to find answers to frequently asked questions (**FAQs**) and browse through the list of **User Guides and Videos** as well as other materials available. You can also search this section by keyword to quickly find what you're looking for.



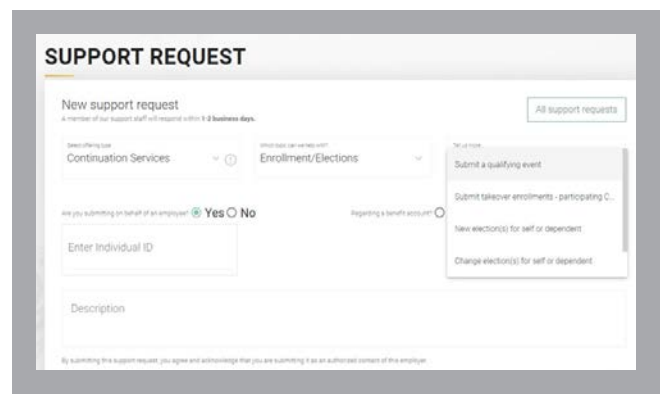
## Support Requests

Also under **Support** you can view your submitted **Support Requests** and a detailed status of each. To submit a new support request, click the **Create Support Request** button on this page, or select **Contact Us** from the top menu.

First, select the offering type. Next, choose from a list of common support topics from the drop-down menu.

Based on your topic selection, you will be presented with a focused set of related sub-topics. Choose the one that fits best.

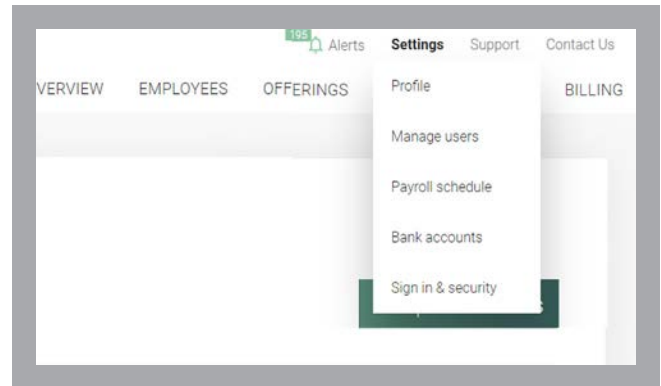
Indicate whether you're submitting the support request on behalf of someone, or about an account. Describe your support request in the box provided, upload a file for reference (*optional*) and click **Submit**.



## Settings

This is where you'll go to find important information about your account and to manage access for you and others.

Some information—your **Profile**, **Payroll Schedule**, and **Bank Accounts**—is view-only. Submit a support request if you need to make changes to that information.

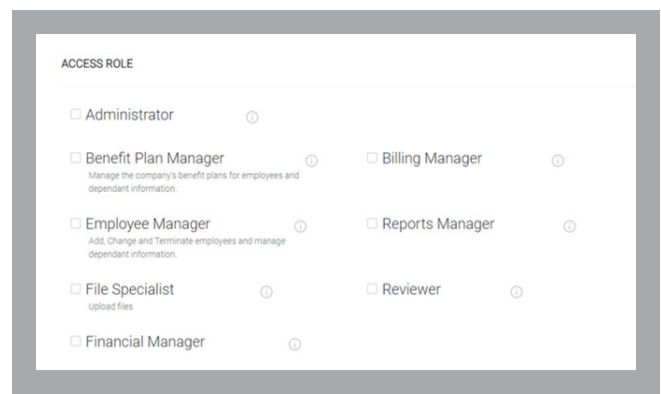


## Setup User Access

Select **Manage Users** to see a list of all users for your account with their ID, business function and access role. The individuals listed are authorized contacts for your account.

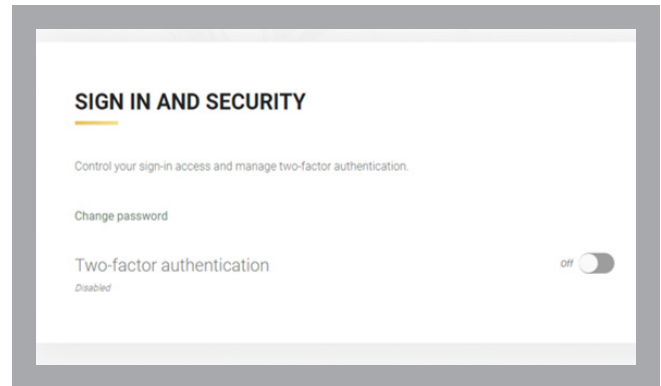
Please be aware that emails regarding continuation participant activity will be sent to the primary contact for your organization. In addition, the phone number that will be printed on any General Initial Notices of COBRA Rights that you request will be the contact phone number of the primary contact person. A phone number is required to be present by COBRA regulation.

To add a new user, click the **Setup User Access** button and enter the new user's contact information, user type (**Employee** or **Distributor**) and **Position**, then select their **User Access Role** from the list. These roles govern what those users can access and what we are allowed to discuss with them.



## Sign In & Security

In this area, you can change your password and manage two-factor authentication.



## Sign Out

When you are finished, select your name from the top menu and click **Sign Out** to securely exit your account.

If you manage multiple accounts, sign in again and select another account from the drop-down list.

# COMPLIANCE MANUAL

## What is COBRA?

In 1985, Congress enacted the Consolidated Omnibus Budget Reconciliation Act, continuation of healthcare coverage requirements commonly referred to as COBRA, designed to protect certain current and former employees and their dependents when they experience a loss of coverage under a group health plan. COBRA provides continuation of health coverage that otherwise would have been terminated due to certain qualified events.

In the absence of COBRA, many people would be without health insurance if their employer-provided coverage terminated due to certain events, such as termination of employment. In sum, COBRA's aim is to cover individuals during the "transition period" (from the time of loss of coverage until the individual obtains other health insurance coverage).

## Employers Subject to COBRA

All employers who had 20 or more employees in 50 percent of their typical business days during the preceding calendar year must comply with COBRA.

If you need help to use one of the two available methods to count employees for COBRA purposes, contact TASC for assistance.

Two exceptions apply to this rule:

- » The federal government has its own rules regarding continuation coverage.
- » Church plans (within the meaning of 414(e) of the Internal Revenue Code).

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All common law employees must be counted, regardless of whether or not they have health coverage. Part-time employees must be counted on a prorated basis. Self-employed individuals, independent contractors, and directors are not counted.

For example, an employer uses 40 hours as the determining factor for full-time status. An employee working 20 hours/week counts as one-half employee for purposes of COBRA. Another employee working at the same company 10 hours per week would be counted as one-quarter employee.

Employers who are participants of a controlled group must offer COBRA as well.

## Benefits Subject to COBRA

The following benefits maintained by the employer are subject to COBRA:

- **Group Health Plans.** A plan maintained by an employer or employee organization to provide health care to individuals (or to their families) who have an employment-related connection to the employer or employee organization.
- **Individual Insurance Policies.** If they involve the provision of health care to two or more employees.

The following are examples of healthcare plans that are subject to COBRA continuation (not an exhaustive list):

- Medical plans
- Dental, vision and prescription drug plans
- Drug and alcohol treatment programs
- Employee Assistance Plans (EAPs) providing medical care such as trained counseling or psychological treatment
- On-site healthcare, including discount or free medical services or medical personnel, providing free, non-occupational treatment
- Some Health Flexible Spending Accounts (FSAs)
- Health Reimbursement Arrangements (HRAs)
- Individual Coverage HRAs

## Qualified Beneficiaries

For purposes of COBRA, a covered employee is any individual who was or is currently provided coverage under a group health plan that comes under the provisions of COBRA as a result of “the performance of services by the individual for one or more persons maintaining the plan (including as an employee defined in 401(c)(1) of the Internal Revenue Code).”

The term Qualified Beneficiary (QB) refers to individuals who are covered under the employer’s group health plan the day before a COBRA qualifying event takes place. A qualified beneficiary is the covered employee, covered spouse of the employee, covered dependent child of the employee, or any child born to, or placed for adoption with the covered employee during the period of continuation coverage.

Each qualified beneficiary has the same rights under the group health plan as a “similarly situated active employee.” It is important to stress that once a COBRA event occurs, an employee’s covered spouse or dependent child, regardless of age, has the same rights under the plan as an active employee.

## COBRA Premiums

As a QB elects COBRA coverage in order to continue coverage of their health plan, they are generally charged 102% of the applicable premium for continuation coverage. See the example below:

Premiums for an Active Employee*		Premiums for a COBRA Continuee	
Single Health:	\$100	Single Health:	\$102
Family Health:	\$300	Family Health:	\$306

\* Assuming no employer contributions

# Qualifying Events

## Qualifying Events and Coverage Periods

Qualifying Events (QEs), also known as eligibility events, are those circumstances under which an individual would lose health coverage. Technically these are defined as “an event, which, but for the continuation coverage required by COBRA, would result in the loss of coverage of a qualified beneficiary.” The nature of a qualifying event will determine how long a plan must offer continuation of the health insurance coverage under COBRA.

The following events allow for 18 months of coverage continuation for all qualified beneficiaries from the date of the qualifying event:

- Voluntary termination
- Involuntary termination, with the exception of gross misconduct (TASC does not define “gross misconduct;” the employer must make this determination)
- Reduction of hours below the minimum required to participate in benefit plan(s)

The following events allow for 36 months of coverage continuation for all qualified beneficiaries from the date of the qualifying event:

- Death of the employee (the spouse and dependents are the only QBs)
- Divorce or legal separation (the spouse and dependents are the only QBs)
- Dependent child ceasing to be a dependent (the dependent is the only QB for this event)

When the bankruptcy of the employer is a qualifying event, the maximum coverage period for the “retired” covered employee is the date of the retired covered employee’s death. For the qualified beneficiary who is the spouse, surviving spouse or dependent child of the retired covered employee, the maximum

coverage period is 36 months after the date of the retired covered employee’s death. COBRA continuation following a company bankruptcy is dependent on the company maintaining a COBRA eligible health plan for at least one participant. If said company ceases to continue with their health plans, no COBRA continuation is available.

As employees experience these qualified events, it is the responsibility of the employer to know and inform the third party administrator when the following events have occurred:

- Voluntary/involuntary termination
- Reduction of hours
- Death of the employee
- Medicare entitlement (enrollment) if loss of benefit eligibility occurs (see [Note on Medicare](#))
- Employer’s bankruptcy
- Divorce or legal separation
- Dependent child ceasing to be dependent

## Standard Secondary Events

A standard secondary event simply means that an employee already on COBRA experiences another qualified event. Such an event allows QBs who are already on COBRA to extend their COBRA coverage. In sum, a standard secondary event is where the first event was termination or a reduction in hours, followed by a second event.

- Death of the employee
- Divorce or legal separation
- Dependent child ceasing to be a dependent
- Disability determination by Social Security Administration (some secondary qualifying events mean a change in premium)



# Notifications

## **COBRA Notifications**

The laws are very clear and specific in respect to notifications under COBRA. Timely mailing of COBRA notifications is vital for a plan to be in compliance. If the employer notice to the administrator is beyond normal deadlines, special handling will be necessary. Employers may be advised to seek the assistance of an experienced benefits attorney.

## **Initial Notification**

Generally referred to as the General Initial Notification (GIN), the intent of this notice is to acquaint employees, spouses, and dependents with the COBRA law, their notification obligations, and their possible rights to COBRA continuation.

This notice must be provided to all covered employees (and spouses) when the plan becomes subject to COBRA continuation. In addition, it must be sent to all new plan enrollees and their spouses. It should be sent upon commencement of coverage under the plan.

The initial notice is sent by TASC by first-class mail to both the employee and spouse at the last known address once employee demographic and plan start information is entered online. If all covered family members live at the same address, only a single notice is needed.

## **Qualifying Event Notification**

The Qualifying Event Notification informs each QB of their rights to continue their group health insurance coverage under COBRA. Plan administrators must distribute this notice within 14 days of the day they learn of the event if a third-party administrator is not present. This notice can be sent to all QBs at the last known address via first class mail.

# Notifications

## Election Period and Time Frames

The laws pursuant to COBRA identify specific time frames related to the notice requirements for employers, plan administrators, and qualified beneficiaries. Once a qualified event occurs, these requirements must be satisfied within specific time periods. This would include: the employer informing the plan administrator of the Qualifying Event, the plan administrator notifying Qualified Beneficiaries of their rights, the management of the election period, collection of retroactive premiums, and prospective premium payment.

1. **Notice to Plan Administrator.** The employer has 30 days to notify the plan administrator that a Qualifying Event has taken place.
2. **Notice to Qualified Beneficiaries.** The plan administrator has 14 days (from the date they received notice from the employer) to generate the Qualifying Event Notification and mail the notification to all qualified beneficiaries if a third-party administrator is present.
3. **COBRA Election Period.** Each Qualified Beneficiary has a minimum election period of 60 days in which to elect COBRA coverage. The 60 days must be based on either the date of the Notice or on the date of the loss of coverage, whichever is later.

Employer Learns of the Event	Notice to Plan Administrator	Notice to Qualified Beneficiary	Premium Payment Period
Up to 30 days	Up to 14 days	60-day election period	Up to 45 days

# Termination

## **Termination, Reduction of Hours, Death, and Bankruptcy Timeline**

For divorce or legal separation and cessation of dependency events, the above applies with one exception. Under these events, the employer has 60 days to notify the plan administrator of the event.

## **COBRA Terminating Events**

Various conditions may cause termination of COBRA coverage:

- The maximum available period of continuation coverage has been reached.
- A Qualified Beneficiary fails to make a timely payment.
- A Qualified Beneficiary becomes covered by another group health plan after the date of the COBRA election.
- A Qualified Beneficiary first becomes entitled to (enrolled in) Medicare Part A or Part B after the date of the COBRA election.
- Employer ceases to provide any group health plan to any employee.
- A Qualified Beneficiary ceases to be disabled according to Social Security Administration after the 11-month disability extension has begun.

