

March 23, 2009

Compliance

trion™
INNOVATION IN BENEFITS

»»»»»»»»»» **ALERT**

» **QUICK LINKS:** Trion.com | [Forward to a Friend](#) | [Contact Us](#)

» **THE COBRA SUBSIDY AND THE AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 - TRION'S IMPLEMENTATION PLANS AND TIMELINES**

This communication is to let you know that Trion has designed clear implementation plans and definitive timelines for all our COBRA clients to ensure they stay compliant with the COBRA changes resulting from the American Reinvestment and Recovery Act 2009 (ARRA).

On March 19, 2009, the Department of Labor released the COBRA Model Notice and clarification of new COBRA regulations. As soon as the Model Notice was released, Trion immediately developed a timeline for full implementation of the new regulations within the COBRA process for clients utilizing Trion for COBRA Administration.

Trion also advised our COBRA clients that, while it was possible to create and issue qualifying event notices based on the initial legislation, we determined the best approach for our clients was to wait for the model notice. By waiting for the model notice, COBRA clients could be certain that all necessary information would be included in the notice in an approved format and also that all related events were properly regulated.

The following is a summary of upcoming key events and their timelines:

March 23, 2009 – Trion provides clients new to Trion's COBRA Administration (clients with an effective date for Trion Administration of October 1, 2008 to March 1, 2009) with a standard spreadsheet file for use in working with their prior administrator or internal systems to obtain a list of COBRA eligible terminations. This file is delivered via email with instructions.

March 23, 2009 - Trion Client Representatives begin contacting clients to review new data requirements that consist primarily of new standard termination codes which must be included

with file submissions.

March 30, 2009 – Trion provides a list to all active COBRA clients containing COBRA eligible terminations with a qualifying event date of September 1, 2008 to March 29, 2009. The list is provided through a secure email with the option of working with a spreadsheet or accessing an online portal to record COBRA terminations with an involuntary or voluntary designation.

Trion uses this information to certify those eligible to receive the premium subsidy.

March 30, 2009 – all clients submitting census files to Trion will be required to supply termination reason codes either as part of the file process, or through a separate submission, thereby ensuring all ongoing terminations are processed according to the new regulations.

March 30, 2009 – COBRA Link is updated to include a termination reason code to ensure all ongoing terminations are processed according to the new regulations.

April 10, 2009 – deadline for returning to Trion the COBRA eligible termination lists with termination reason for COBRA terminations with a qualifying event date of September 1, 2008 to March 29, 2009, based on the list provided on March 30, 2009.

March 31, 2009 to April 17, 2009 – Trion begins issuing new Qualifying Event Notices for all COBRA eligible terminations with a qualifying event date on or after September 1, 2008. New payment coupons are generated for those COBRA eligible who have claimed the premium subsidy by returning the new Qualifying Event Notices *and* who have been designated as involuntary terminations.

April 17, 2009 – Clients are required to have updated census files containing the termination reason code to ensure all ongoing terminations are processed according to the new regulations in a controlled process.

Trion is confident that all requirements from Title III - Premium Assistance for COBRA Benefits will be fully implemented within the required period of time.

As always, our goal is to absorb the majority of our clients' administrative burdens. Although these regulations do require some additional input on the part of our clients, we have created a process that is as seamless as possible in order to deliver our stated goal.

ADDITIONAL TRION RESOURCES

As a reminder, Trion has established numerous resources to complement our normal communication efforts and further address your questions and concerns.

- **COBRA hotline: 610.945.1173**

Direct COBRA hotline for you to personally speak with a COBRA expert. Due to high call volume, you may need to leave a message which will be returned within 24-48 hours.



- **Directly routed email address**

Direct email address that routes to an internal Trion COBRA expert to answer your questions and meet your concerns. Your email will be answered within two business days.

- **Trion COBRA webpage**

Specifically designated COBRA webpage housing a library of relevant and frequently updated information around the new legislation including Federal COBRA forms and instructions, important Federal agency links, a copy of the Federal legislation with Trion's interpretation of the laws and how it will impact you as an employer, archived Trion COBRA Compliance Alerts, and more.

ABOUT TRION COMPLIANCE ALERTS

Compliance Alerts are provided with the understanding that they do not provide legal, accounting or other professional advice or service. While Trion strives to ensure the accuracy and completeness of these alerts, the publisher, authors, editors, and contributors of the contents are not responsible for any errors or omissions, or for the failure to report a change in any laws, decisions, regulations, interpretations or other pronouncements. Trion does not control or guarantee the accessibility, accuracy, relevance, timeliness, or completeness of outside information for which links may be provided, nor does it endorse any views expressed or products or services offered by such organization or authors.

©2007 Trion. All rights reserved.

PHILADELPHIA NEW YORK CHICAGO SAN FRANCISCO BALTIMORE CHARLOTTE GREENSBORO DALLAS
P 866 874 6647 W www.trion.com E info@trion.com