

Compliance Update

COBRA and Stimulus:

The qualification for the COBRA subsidy ends in December but the subsidy benefits will continue for 9 months for those eligible. The subsidy benefits end when the person has exhausted their 9 months or no longer qualifies.

Example: an individual is terminated in December and loses health coverage, if eligible, he/she can still receive 9 months of the subsidy.

Please see additional details on our website: www.bankers-ins.com, click on IBBP/Employee Benefits and then Compliance.

HIPAA Privacy and Security:

- Effective September 23, 2009 extensive changes were made to HIPAA which focus on substantially increasing the civil penalties for a breach of privacy.
- It affected internal policies and how the IBBP handles a breach.
- No change to the IBBP Privacy Policy or Notice are required..

Medicare Secondary Payor:

- The IBBP must update annually
- The information provided by the banks regarding the number of employees determines who is primary (Medicare or the IBBP) for those persons age 65 and older and enrolled in Medicare Part A.
 - Banks with under 20 employees – Medicare is primary for the employees age 65 and older
 - Banks with over 20 employees – The IBBP is primary for the employees age 65 and older
- Centers for Medicare Services (CMS) requires social security numbers on all covered members over the age of 45.
- Wellmark will be mailing requests for social security numbers to your employee's home addresses.