

Christie Davis

From: Peters, Mary R <mary.peters@umr.com>
Sent: Thursday, October 23, 2014 9:04 AM
To: Caplinger, Christine; christiedavis@co.titus.tx.us
Cc: UMR-COBRARateChange
Subject: Titus County - 76411401 Request for 1/1/2015 Rate Change
Attachments: RateListing.rtf

Hello Christie,

It's that time of year again. Your COBRA rate guarantee date of 1/1/2015 will soon be here. Attached is a copy of your Rate Listing report showing the current plans and rates entered into our COBRA processing system. Please provide us with any changes (including the 2% administration fee). A reminder notice will be sent the week of 11/17/2014 as UMR needs a minimum of 14 business days to implement the changes. If we do not receive the rates by 12/15/2014 you will need to subsidize the difference in the January rates.

If you have an open enrollment period, we can give you an up-to-date mailing list of all active enrolled COBRA participants and all pending COBRA participants including their name and most current address that we have on file. This mailing list can be produced for you in Word or Excel. If this is a service you would like us to provide, please contact me. Reminder: If you have an open enrollment period for your Active Employees, you also need to provide an open enrollment period for the COBRA enrolled and pending individuals.

The COBRA regulations state that the determination period selected by the plan must be applied consistently from year to year. UMR's interpretation of the regulations is that if your rates have historically been set for January 1, you should continue to change rates on January 1 if you are going to make a rate change. Rate changes must be communicated to the qualified beneficiaries prior to the beginning of the determination period. COBRA is an employer law. If you direct us to change the rates at a different time, you may be in violation of COBRA regulations. Please note this is not a legal opinion. If further interpretation of Treasury Regulations 54.4980B-8 is needed please consult with your legal counsel.

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