COBRA Enterprise – XML and Flat-File ASCII Data Layout Specifications

for Submission of COBRA Activity (New Enrollments and Qualifying Events)



Establishing Electronic Data Transfer (EDT) with Infinisource can eliminate or minimize manual transactions. EDT is appropriate for high volumes of activity, or for parties transmitting data on behalf of multiple employers. Data feeds are files created through an automated process from another source of data, such as an HRIS, a payroll system, or an insurance census.

This guide provides an explanation of the two basic EDT file types and submission processes, as well as record and field description specifications for both XML and Flat File ASCII format files.

Contact Customer Response Account Specialists at CustomerResponse@infinisource.com. The EDT Specialist can be contacted at EDT@infinisource.com or 866-350-3040



# Related Documents



* [EDT Troubleshooting Guide – Common Data Exchange Errors](https://infinisource.box.com/v/ErrorTroubleshooting)
* *Sample Files –*[NE SAMPLE](https://infinisource.box.com/v/NESample)*(ASCII),* [QE SAMPLE](https://infinisource.box.com/v/QESample)*(ASCII),* [TESTNE](https://infinisource.box.com/v/TestNE)*(XML)*[*,* TESTQE](https://infinisource.box.com/v/TESTQE)*(XML)*
* *XML Schema – NE & QE available upon request*
* [Infinisource, Inc. COBRA Electronic Data Test Plan](https://infinisource.box.com/v/COBRAEDTTestPlan)



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# EDT Process



## Qualifications for EDT

Electronic Data Transfer requires technical support for both the transmitting and receiving parties. Infinisource, Inc. maintains support personnel to maintain, monitor and troubleshoot our processes and equipment. Employers and suppliers must provide their own technical support for the creation and transmission of files to Infinisource. A Statement of Work must be signed by the Employer Manually created files will not be accepted by Infinisource.

## General EDT Process Flow

The general process flow for Infinisource EDT is illustrated in the figure on the next page.

1. The EDT Specialist reviews documentation and specifications with the customer and/or 3rd Party and helps determine the appropriate submission method (Secure Data Transfer Web Upload, File Transfer Protocol (FTP/FTPS) or Secured File Transfer Protocol (SFTP). Effective date, test plans, and Plan and Rate mapping are determined as well.
2. After the Statement of Work/3rd party EDT Authorization form is processed, the customer EDT contact will be provided with a unique User ID and password to be used in EDT file submission and coded within the EDT files (Header Record), as well as a Username and password to be used to login to the Secure Data Transfer Web Upload, File Transfer Protocol (FTP/FTPS) or Secured File Transfer Protocol (SFTP). 
3. The customer and/or 3rd party will submit test files until Plan code, Coverage code, Option codes and applicable events are adequately tested as error free.

**NOTE**: The EDT Specialist should be notified after the submission of each test file to ensure a timely review. When error free submissions have been confirmed, the EDT specialists will begin the final steps for releasing to production.

1. The customer and/or 3rd party will provide guidance on the following:  Day of the week files will be sent
   * Are files sent when zero activity occurs?
   * Confirm production files will capture data from the last file sent. **NOTE:** Infinisource accepts changes only files, full files are not accepted.

1. The customer and/or 3rd party to confirm code changes for Production Files Header record:
   * Validate only to False
   * Response Email to reflect responsible party to monitor the Submission Results Confirmation reports.

**NOTE**: Files with live COBRA activity must be submitted through either Secure Data Transfer Web Upload, File Transfer Protocol (FTP/FTPS) or Secured File Transfer Protocol (SFTP). EDT files will **not** be accepted via email.

Figure 1. Electronic Data Transfer Process



## File Naming Conventions

All files must follow a standard naming convention when submitted for Electronic Data Transfer to ensure clear identification of the submission type (Test or Production), customer, file type (NE or QE), date and file format (XML or TXT). Examples are provided below.

**NOTE**: File names must not include any spaces.

Test Files

Test File Identifier Customer File Type Date of Submission File Format



Test\_CompanyName\_NE\_MM\_DD\_YYYY.XML Test\_CompanyName\_NE\_MM\_DD\_YYYY.PGP

Production Files

Production file names use the same naming convention as test files without the leading “Test” file identifier.

Customer File Type Date of Submission File Format

(New Enrollee – NE or (XML or TXT) 

Qualifying Event – QE)

CompanyName\_NE\_MM\_DD\_YYYY.TXT

CompanyName\_NE\_MM\_DD\_YYYY.XML CompanyName\_NE\_MM\_DD\_YYYY.PGP

## Test Files

Test files must be sent in *Validate Only* mode. *Validate Only* processes data through the defined system Business Rules, but data are not saved, and notices are not generated or sent. After sending a test file, send a request to the EDT Specialist at EDT@infinisource.com for review of the file.

After submitting a test file, a Data Submission Result reports is emailed to the Response Email value in the header records. Reference the (EDT Troubleshooting Guide – Common Data Exchange Errors) for guidance in correcting any errors in the file.

## Production Files

Production files must be sent in *Validate & Save* mode. *Validate & SAVE* processes data through the defined system Business Rules, saves the data in the system, and generates and sends applicable notices.

After each production file is submitted, a Data Submission Result report is emailed to the Response Email value in the header records of the submitted file. Reference the EDT Troubleshooting Guide – Common Data Exchange Errors for guidance in correcting any errors in the file.

Infinisource’s expectation is to receive changes only files. COBRA EDT files are not capable of updating or making changes to previously submitted records. Therefore, record updates such as coverage, address, dates and premium amount changes may result in a record failure for duplication.

**NOTE**: Files with live COBRA activity must be submitted through either Secure Data Transfer Web Upload, File Transfer Protocol (FTP/FTPS) or Secured File Transfer Protocol (SFTP). EDT files will **not** be accepted via email.

## Plan & Rate Front-Loading and Maintenance

These specifications are designed to use the existing plans and rates stored in the system.

Plans & Rates define all coverage options and associated premium rates offered by the customer to the eligible employees, their spouses and dependents.

Front-Loading

Premium rates can be loaded and stored in the system in advance (“front-loaded”) by providing the rates for all coverage types to Infinisource at the time of account setup. Rates that are front-loaded are used by the system when generating notices.

User-Provide Rates

User-provide rates must be included in the EDT submission file. User-provide rates may vary based on age, gender, or region of the country or may vary based on an employee’s annual election (e.g., FSA).

User-provide rates must reflect the applicable cost of coverage to the plan, **plus the 2% administrative fee** allowed by law.

Renewal

A Rate Renewal Report is generated for the customer 60-days prior to the expiration date of the various premium rates stored in the system. The Rate Renewal Report served to notify the customer of the expiration dates and reminds the customer to provide updated premium rates to Infinisource before expiration date.

Rates can be provided by email to plansandrates@infinisource.com.



# EDT Data Submission Methods



Infinisource supports three EDT submission methods:

* Web Upload
* File Transfer Protocol (FTPS)
* Secured File Transfer Protocol (SFTP)

The system is capable of processing PGP-encrypted files submitted by either method. The appropriate Public Key will be provided to customers or 3rd Parties upon request to use the PGP encryption service.

Regardless of the method of EDT submission used, the system generates a Data Submission Result report for all processed and submitted records, including any applicable error messages, and sends that report to the contact email address specified in the submitted file.

Users should refrain from submitting the same file more than once.

* The system will generate an error and not process the 2nd submission of a file **within a 30 day period**.
* The system will, however, successfully process (and generate notices) for multiple submissions of the same file if the time between the submissions is **greater than 30 days**.
* Infinisource COBRA EDT files are not capable of updating or making changes to previously submitted records. Therefore, record updates such as coverage, address, dates and premium amount changes may result in a record failure for duplication or subsequent notices mailed if **greater than 30 days.** Changes should be reported through our COBRA Customer Support Team at (866) 320-3040.

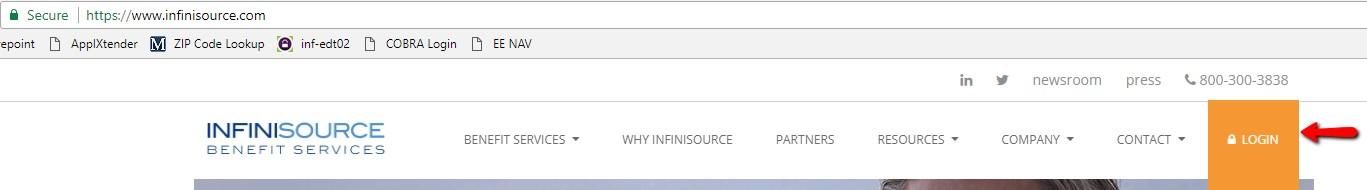
**NOTE**: Infinisource currently supports these three data submission methods; however, users are encouraged to contact Infinisource to suggest other methods used by their organizations.

Secure Data Transfer Web Upload

Data files can be securely uploaded directly to the system for automated processing of COBRA events and new enrollments on the Infinisource secured web site. This method of data submission requires two sets of credentials (Username or ID and password) unique to the customer provided by Infinisource:

* Username and password to log into the secured web site
* User ID and password for file authorization (as required in the Header Record)

To submit files using the secure data transfer web upload method, the user logs into the secure website from [http://www.infinisource.com](http://www.infinisource.com/) by clicking *Login* in the upper right corner.

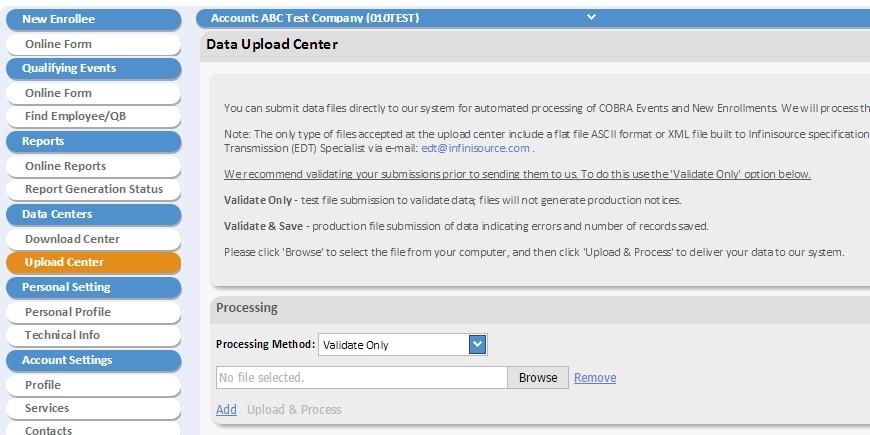




… and log in with the User ID and password specific to the customer 

**1**

|  |
| --- |
| **4** |
| **5** |

**2** 

**3**

* 1. Select *Upload Center* from the menu at the left.
  2. Select a Processing Method:
     1. Validate Only – for submitting test files
     2. Validate & Save – for submitting production files with live data (See NOTE below.)
  3. Click *Browse* and locate the file to be submitted from the user’s network
  4. Click *Add* (you may add additional files by *Browsing* for another file and click *Add)*
  5. Click *Upload & Process*

NOTE: If the Header Record includes a value for ‘Validate Only’ (positions 176-180), that value will supersede the processing method selected on the upload screen.

File Transfer Protocol

FTPS (also known as FTP-ES, FTP-SSL and FTP Secure) is an extension to the commonly used File Transfer Protocol (FTP) that adds support for the Transport Layer Security (TLS) and the Secure Sockets Layer (SSL) cryptographic protocols

Secure File Transfer Protocol (SFTP) is a secure version of File Transfer Protocol (FTP), which facilitates data access and data transfer over a Secure Shell (SSH) data stream. It is part of the SSH Protocol. This term is also known as SSH File Transfer Protocol

The SFTP or FTP/FTPS method of data submission requires the user to connect directly to a secure server using a supported FTP customer, such as Core FTP [(http://www.coreftp.com/download.html)](http://www.coreftp.com/download.html) or FileZilla [(http://sourceforge.net/projects/filezilla/files/)](http://sourceforge.net/projects/filezilla/files/), to upload files directly to the server. This method of data submission requires two sets of credentials (Username or ID and password) unique to the customer provided by Infinisource:

* Username and password for Core FTP or FileZilla
* User ID and password for file authorization (as required in the Header Record)

Infinisource uses Secure Socket Layer (SSL) over FTP to encrypt login credentials and data streamed to the server, providing a security guarantee for the data from the minute connection is made. To utilize this method, our FTP server is configured to create the data channel over ports 2000-4000, please sure the your firewall is configured to allow the tcp ports 2000-4000 from IP address 67.219.204.21

**FTP Customer setup to connect to the Infinisource server:** FTP/FTPS

* Enter the Site Name: Infinisource\_EDT
* Enter the Host/IP/URL: ftp.infinisource.com
* Enter the Username and password provided by Infinisource for FTPS
* Port 21
* Passive

Select only the following SSL Options:

* AUTH TLS
* SSL Listings
* SS Transfers
* Directory: Root

SFTP

* Enter the Site Name: Infinisource\_EDT
* Enter the Host/IP/URL: ftp.infinisource.com
* Enter the Username and password provided by Infinisource for FTPS
* Port 22
* Connection type: SSH/SFTP
* Directory: root

**NOTE**: During testing, while waiting for SFTP or FTP/FTPS setup; files may be tested using web upload for the sake of convenience and expedience.

# Responsibilities of Each Party



The Customer (and/or Customer’s designee) and Infinisource, Inc. assume only the following responsibilities through the EDT process.

## Customer or Customer’s designee

1. Audit: Customer (and/or Customer’s designee) is responsible for reviewing any information and/or reports provided by Infinisource as soon as possible after receipt and must notify Infinisource of any errors in such information and/or reports as soon as possible after review.
2. Reporting of Information: Customer (and/or Customer’s designee) must use one of the reporting methods established by Infinisource and must furnish the information determined by Infinisource to be necessary to satisfy its responsibilities. Such information must be provided to Infinisource in a timely fashion and per the appropriate specifications for the reporting method(s) agreed to by the parties.
3. Responsibility for Inaccurate/Untimely Information: Customer (and/or Customer’s designee) is solely responsible for providing accurate and timely information. Infinisource cannot accurately perform its duties without accurate and timely information. Thus, Infinisource shall have no liability to a Customer or any Covered Individual as a consequence of inaccurate and/or untimely information provided to Infinisource by a Customer, its designee, or another existing or former service provider. Infinisource will have no obligation to credit a Customer for any claims expenses or administrative fees incurred or paid to Infinisource as a consequence of Infinisource receiving inaccurate or untimely information. Customers must pay Infinisource its standard hourly rate for any corrections required as a result of such inaccurate or untimely information. Infinisource is under no obligation to question the completeness or accuracy of such information. 
4. Notices Required by COBRA: Customer (and/or Customer’s designee) must report all such information necessary for Infinisource to provide COBRA notifications.
   * Customer (and/or Customer’s designee) must report information necessary to complete the *General Notice* as soon as possible after an individual becomes covered but no later than 75 days after the commencement of coverage.
   * Customer (and/or Customer’s designee) must report all COBRA *Qualifying Events* to Infinisource as soon as possible after the event occurs but no later than 30 days after the event, except where the Qualified Beneficiary is required to provide notice of a Qualifying Event.
5. Plan Changes: Customer (and/or Customer’s designee) is responsible for notifying Infinisource of the applicable premium amounts, as well as any other related information that Infinisource deems necessary (e.g. due dates, etc.), and any changes to the applicable premiums at least 30 days prior to the effective date of such change.
6. Testing: Customer (and/or Customer’s designee) is responsible for the completion and submission of any test files deemed necessary to ensure successful transmission of EDT files. Upon completion of testing, Customer (and/or Customer’s designee) will receive a *Release to Production* letter from the EDT Specialist confirming successful transmission of EDT test file(s) and approving Customer (and/or Customer’s designee) to begin submission of production files.

## Infinisource

1. Technical Support: Infinisource is responsible for providing technical support to Customer (and/or Customer’s designee) for properly submitting information to Infinisource. This support includes assisting with troubleshooting of test files.
2. Data Transfer: Infinisource will establish various methods for transferring information to and from Infinisource, including those described in this document.
3. Reporting: Infinisource will send, or make available, on a periodic basis to Customer (and/or Customer’s designee, as directed in writing) standard verification reports listing the COBRA notices sent.

# New Insurance Enrollees (General Notice)



The COBRA law requires that participants in group health plans be initially notified of their COBRA rights and responsibilities at the **time of commencement of coverage** under the plan by issuing a General Notice. It is important to note, for this purpose, that commencement of coverage is different than enrollment in a group health plan. It is also important to note that not all group plans are subject to COBRA, and commencement of coverage under these plans should not be enough to trigger a record for these purposes.

## Time Frame

The COBRA law specifies a 90-day time frame for sending the General Notice to participants. This 90-day window begins on the date coverage commences.

## Enrollment Events

The most common event resulting in enrollment, and subsequently, commencement of coverage, is a new hire and re-hire. This often provides an excellent illustration of the difference between enrollment and commencement of coverage. Many group health plans require a new employee to complete a waiting period before coverage commences. Although the employee may enroll himself (with or without family members) at the time of employment, coverage will not actually begin until 30, 60 or 90 days later.

Other events, such as the birth of a new child, adoption, and marriage, as well as HIPAA special enrollments, can cause *commencement of coverage* under different circumstances and time frames thus resulting in the newly enrolled individual(s) to receive a General Notice. A change in plan at the same tier level does not constitute the reporting of an individual to receive a General Notice.

**Example:** An employee has family coverage with BCBS and changes to Cigna with the same enrolled participants at open enrollment or Special Enrollment **and** was previously reported to Infinisource would not need to be reported in the New Enrollee file. 

## Notices

It is important to note that **separate notices are not generally required for every family member**. In fact, in many situations, one notice, properly addressed, will notify everyone in the household. For an entire family residing at the same address, one record submitted for the employee will be addressed in a manner to include all covered family members. However, if any covered family member resides at a different address, an additional notice is required. In this case, additional enrollee records should be submitted with the appropriate address. Please refer to the information about enrollees, below.

## Background

Data can easily be transmitted to Infinisource’s Enterprise System for generation of the COBRA General Notice. A typical General Notice consists of: the employee and related enrollees. The data have a simple hierarchical nature - for each employee there may be one or many enrollees, as illustrated below:

Employee information is

There may be one or several captured in a single employee

enrollees associated with the record per General Notice.

The employee record  employee. (The employee is usually an enrollee.) For each

enrollee, the following data includes:

* Employee number
* Social security number
* Enrollee’s relationship
* Date of birth
* Employee name
* Enrollee address

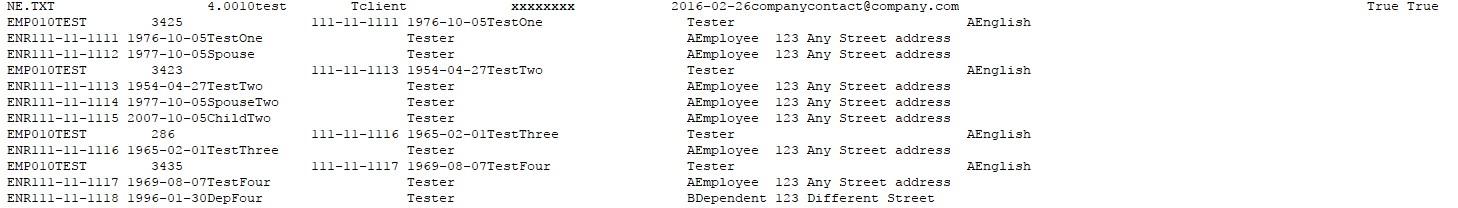
This information is used to produce the initial COBRA General Notice for each enrollee.

## File Format Options

EDT files to generate the General Notice consist of a single header record, multiple employee records with multiple enrollee records attached to each employee record. Two format options for EDT files are described below: XML and Flat File ASCII. Either format may be used for Electronic Data Transfer by Secure Data Transfer Web Upload, File Transfer Protocol (FTP/FTPS) or Secured File Transfer Protocol (SFTP).

Flat File ASCII Specification

**NOTE**: A sample of this file layout is available on page one under Related Documents



Unlike XML files, ASCII flat files do not display an obvious logical, physical structure. ACSII flat files rely on very specific starting positions and length for individual data elements, with none of the descriptive tags that are present in XML files.

The one-dimensional nature of the ASCII flat file does not allow for the expression of complex data hierarchies. In addition, unlike XML files, there is no option to validate data in ASCII flat files prior to submission.

## Record and Field Description

Header Record

There is a single Header Record per submitted file. The Header Record identifies the Customer, how to apply COBRA rules for the Customer Company, and how to catalog the data contained in the file in our system.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Header Record** (one record per file) | | | | | | |  | |  | |  | |  | |  |
| ***Field Name*** | | ***Required?*** | | | ***Type*** | | ***Starting Position\**** | | ***Length\**** | | ***Format*** | | ***Description*** | | ***Mapping Notes*** |
| FileFormat | | Yes | | | String | | 1 | | 25 | | Alpha | | Identifies the file format to our system. The value must be: NE.TXT | | NE.TXT |
| FileVersion | | Yes | | | Numeric | | 26 | | 3 | | Numeric | | Identifies the version number of the specifications used to generate the submitted file. The value should match the version number in the footer of this document (e.g., 4.0). | | 4.0 |
| CompanyNo | | Yes | | | String | | 29 | | 15 | | Alpha numeric | | The Customer account number assigned by Infinisource. | | CN99136 |
| UserID | | Yes | | | String | | 44 | | 20 | | Alpha numeric | | Assigned account User ID for the person (or Customer) submitting the data. (Used for authentication purposes.) | | Leave blank |
| Password | | Yes | | | String | | 64 | | 20 | | Alpha numeric | | Assigned account password for the person (or Customer) submitting the data. (Used for authentication purposes.) | | Leave blank |
|  | SubmissionDate | | Yes | Date | | 84 | | 10 | | YYYY-MM-DD | | Date that the data was submitted (YYYY-MM-DD) | | Today’s date | |
|  | ResponseEMail | | Yes | String | | 94 | | 65 | | Alpha | | Email address to which our system will send a response report. | | benefits@inpo.org | |
|  | ResponseFAX | | No | String | | 159 | | 12 | | 999-999-9999 | | FAX number to which our system will send a response report, if desired. | | Leave blank | |
|  | SendNotices | | No | String | | 171 | | 5 | | True/blank | | (*OPTIONAL*) Indicates if notices should be generated for submitted records.  TRUE = generate & send notices | | TRUE | |
|  | ValidateOnly | | Yes/No | String | | 176 | | 5 | | False/blank | | **T E S T I N G**  (*REQUIRED*) Requests validation of the submitted data without saving the records.  TRUE = validate data without saving | | **Set to TRUE for the TEST session in back office** | |
|  | **P R O D U C T I O N** **NOTE**: After moving to production, this field should be left blank. | | **Set to blank for the Scheduled session in back office** | |

* Starting Position and Length required for Flat File ASCII format.

Employee Record

Each General Notice consists of a single employee record. There can be several General Notices, and thus several employee records submitted in a single file. The employee record is the ‘parent’ of related enrollee records.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Employee Record** (one record per event; may be several per file) | | | | | |  |  |
| ***Field Name*** | ***Required?*** | ***Type*** | ***Starting Position\**** | ***Length\**** | ***Format*** | ***Description*** | ***Mapping Notes*** |
| RecordType | Yes | String | 1 | 3 | Alpha | Identifies this is an employee record. Value = EMP | EMP |
| CompanyNo | Yes | String | 4 | 15 | Alpha numeric | The Customer account number assigned by Infinisource. (This will usually be the same as in the header record.) | CN99136 |
| EmployeeNo | No | String | 19 | 20 | Alpha numeric | Employee number or identifier. (Must uniquely identify the employee. The system will retain this value, and use it to prevent duplicate transmission of the same  New Enrollee record.) | eepssn |
| SSN | No | String | 39 | 12 | 333-33-3333 | Social security number | eepssn |
| DOB | No | Date | 51 | 10 | YYYY-MM-DD | Date of birth (YYYY-MM-DD) | eepdateofbirth |
| Firstname | Yes | String | 61 | 25 | Alpha | First name | Eepnamefirst |
| Lastname | Yes | String | 86 | 35 | Alpha | Last name | Eepnamelast |
| Initial | No | String | 121 | 1 | Alpha | Middle initial | 1st digit of eepnamemiddle |
| LanguageCode | Yes | String | 122 | 25 | Alpha | The language in which notices should be generated. ‘English’ is the default language. (Refer to the  *Language Codes* table in the *Support Codes* section of this document for a complete list of available languages.) | English |

* Starting Position and Length required for Flat File ASCII format.

Enrollee Record

Enrollee records are attached to a single employee record. (The enrollee record is the ‘child’ of the related employee record.) There may be one or several enrollee records for each employee record, representing the employee and each additional member of the family eligible for a General Notice. The Employee may or may not be the enrollee depending on who is newly enrolled. (i.e. marriage or HIPAA Special Enrollment rights, see ***Enrollment Events*** page 13)

There **must** be an enrollee record for each employee record submitted.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Enrollee Record** (one record per event; may be several per file) | | | | | |  |  |
| ***Field Name*** | ***Required?*** | ***Type*** | ***Starting Position\**** | ***Length\**** | ***Format*** | ***Description*** | ***Mapping Notes*** |
| RecordType | Yes | String | 1 | 3 | Alpha | Indicates that this is an enrollee record. Value = ENR | ENR |
| SSN | No | String | 4 | 12 | 333-33-3333 | Social security number | Eepssn or conssn |
| DOB | No | Date | 16 | 10 | YYYY-MM-DD | Date of birth (YYYY-MM-DD) | Eepdateofbirth or condateofbirth |
| Firstname | Yes | String | 26 | 25 | Alpha | First name | Eepnamefirst or connamefirst |
| Lastname | Yes | String | 51 | 35 | Alpha | Last name | Eepnamelast or connamelast |
| Initial | No | String | 86 | 1 | Alpha | Middle initial | 1st digit of eepnamemiddle or connamemiddle |
| RelationCode | Yes | String | 87 | 10 | Alpha | Code indicating how the enrollee is related to the Employee. . (Refer to the *Relationship Codes* table in the *Support Codes* section of this document for a complete list of supported options.) | If conrelationship = CHL, DIS, DPC or STC send Dependent  If conrelationship = SPS or DP send Spouse  If employee send Employee |
| Address1 | Yes | String | 97 | 55 | Alpha numeric | The street address | Eepaddressline1 |
| Address2 | No | String | 152 | 55 | Alpha numeric | An additional address line | Eepaddressline2 |
| City | Yes | String | 207 | 35 | Alpha numeric | City | Eepaddresscity |
| State | Yes | String | 242 | 5 | Alpha | Code representing the state of residence. (**NOTE**: Field is longer than the standard 2-letter US state code to facilitate international codes.) | Eepaddressstate |
| Zipcode | Yes | String | 247 | 15 | 99999-  9999999 | Postal code (**NOTE**: Filed is longer than the standard 5- + 4-digit US zip code to facilitate international codes.) | Eepaddresszip |
| CountryCode | Yes | String | 262 | 3 | USA | Code indicating the country of residence; defaults to ‘USA’. (Refer to the *Country Codes* table in the *Support Codes* section of this document for a complete list of supported options.) | USA |
| InsuranceEffective | Yes | Date | 265 | 10 | YYYY-MM-DD | The date that insurance becomes effective (YYYY-MM-DD) | Eedbenstartdate or dbnbenstartdate |

* Starting Position and Length required for Flat File ASCII format.

# Qualifying Events



The COBRA law requires notification of COBRA rights to Qualified Beneficiaries when coverage is lost due to a Qualifying Event. The time frame for this notification is very specific, as are the events that trigger this notice.

## Time Frame

An employer/plan administrator has 44 days from the **date of the Qualifying Event** (not the Loss of Coverage date) to send the Qualifying Event notice. Exceeding this time frame can result in fines and penalties for the employer/plan administrator.

## Qualifying Events

A Qualifying Event for COBRA purposes is a combination of both an Event (listed below) and a Loss of Coverage.

The COBRA Events generally sent via EDT include:

* Death of the Employee
* Divorce/Legal Separation
* Dependent Ceasing to be Dep
* Employee's Reduction of Hours
* Termination of Employment
* Involuntary Termination of Employment 
* Employee's Layoff

**Event Codes that typically do not pass via EDT**

* Medicare/Reduction of Hours
* Medicare/Employee's Termination
* Employee's Medicare Entitlement
* Military Leave of Absence

A Loss of Coverage can include:

* Literal loss of coverage under the group health plan
* Change in premium arrangement (increase or decrease)

Example: an employee who reduces his/her work hours, can continue coverage under the group health plan, but the contribution amount increases.

The loss of coverage does not need to be immediate. It needs only to occur within the 18- or 36-month period following the event to be considered a loss of coverage for COBRA purposes. An employee who changes coverage *does not* necessarily incur a loss of coverage, especially if there is not a corresponding event causing it.

A listed event can occur without a corresponding loss of coverage. For example: an employee who terminates employment **before** his group health coverage under the plan commences.

Conversely, a loss of coverage can occur without an event. Example: an employee who asks to remove **himself** or a family member from the plan.

There is an optional rule under which an employer can use the loss of coverage date as the Qualifying Event date. Because the rule is *optional*, employers should obtain approval from all carriers before applying this rule. The rule allows administrative simplification in cases where the loss of coverage occurs at a uniform interval, such as the end of the month. This rule allows the employer to measure the COBRA maximum coverage period from the same date for all Qualified Beneficiaries. This calculation can result in a maximum coverage period that is longer than 18 or 36 months. When applying this provision, please provide the same date for the Qualifying Event date and the loss of coverage date.

Example: John resigns on July 15, 2006 (Qualifying Event Date)

Coverage will end July 31, 2006 (Loss of Coverage Date)

**Standard** calculation: 18 months from July 15, 2006 (Qualifying Event Date) would be January 15, 2008 (COBRA Expiration Date)

**Optional** calculation: 18 months from July 31, 2006 (Loss of Coverage Date) would be January 31, 2008 (COBRA Expiration Date, an additional 16 days of coverage)

Additionally, severance packages can affect the offering of COBRA. Employers should refer to the terms of eligibility in the plan’s Summary Plan Description, and offer COBRA in accordance with those terms. Commonly, employers will subsidize or pay for COBRA coverage once a timely election is made. In these cases, the loss of coverage date should not be delayed.

## Qualified Beneficiaries

A Qualified Beneficiary is an individual who was covered by the group health plan, and has lost coverage due to an event. Generally, if the employee loses coverage, so do all family members. It is possible, however, for only one family member to experience a loss of coverage.

## Offered Coverage

The coverage offered to a Qualified Beneficiary at the time of the Qualifying Event must be the same coverage that the Qualified Beneficiary had the day before the event.

Infinisource can load and store plan, benefit option, and rate information. When plan information is front-loaded, rate information is not required in the data submission files. Infinisource will match the event date with plan and benefit option data, and determine the correct COBRA premium. (If the rates are out of date in the system, the records will fail and return an error message.)

If no plan information has been front-loaded, COBRA premium rates are required in the data submission files. In this case, the rate is the applicable cost of coverage to the plan, plus the 2% administrative fee allowed by law.

## Notices

Generally, separate notices are not required for every family member. In many situations, one notice, properly addressed, will notify everyone in the household. For an entire family residing at the same address, one record should be submitted for the Qualified Beneficiary, resulting in one notice, addressed in a manner to include all covered family members:

Joe Employee

Spouse/Dependents (if any)

123 Main Street

Anytown, USA 12345

However, if any covered family member resides at a different address, an additional notice is required. Additional Qualified Beneficiary records should be submitted with the appropriate address(es).

|  |  |  |
| --- | --- | --- |
| Joe Employee  And Dependents (if any)  123 Main Street  Anytown, USA 12345 | Jane Spouse  And Dependents (if any)  456 Main Street  Anytown, USA 12345 | Johnny Dependent  789 Main Street  Anytown, USA 12345 |

**NOTE**: Infinisource cannot accept responsibility for excess COBRA notifications. Renewal fees for Infinisource services are based largely upon the utilization of the service (or, the volume of notices generated).

## Background

Data for new COBRA Qualifying Events can easily be transmitted to Infinisource’s Enterprise System for complete processing over the life of COBRA. A typical Qualifying Event consists of: the employee who experienced the Qualifying Event, Qualified Beneficiary(ies) (QB) who qualify for continued coverage, and offered plan coverages from which the beneficiary(ies) are entitled to elect for continued coverage. The data are hierarchical in nature - for each employee, there may be one or more QBs, and for each QB, there may be one or more offered plan coverage’s, as illustrated below:

There may be one or more Qualified Beneficiaries (QB) associated with the employee. (The employee may or may not be a QB, depending on the type of event experienced.) QB 

|  |  |  |
| --- | --- | --- |
| information included in the QB  record includes: | | Each QB may be offered one or more plan coverage’s. Information for each plan coverage is included in the coverage record, such as:   * Plan, coverage, and option codes that describe the plan * Date that coverage was lost * Monthly premium * Day of the month that the premium is due |
|                    | Event code to describe the nature of the event and its  COBRA duration  Event date  Social security number  Date of birth  QB’s relationship to the  employee QB name  QB address |

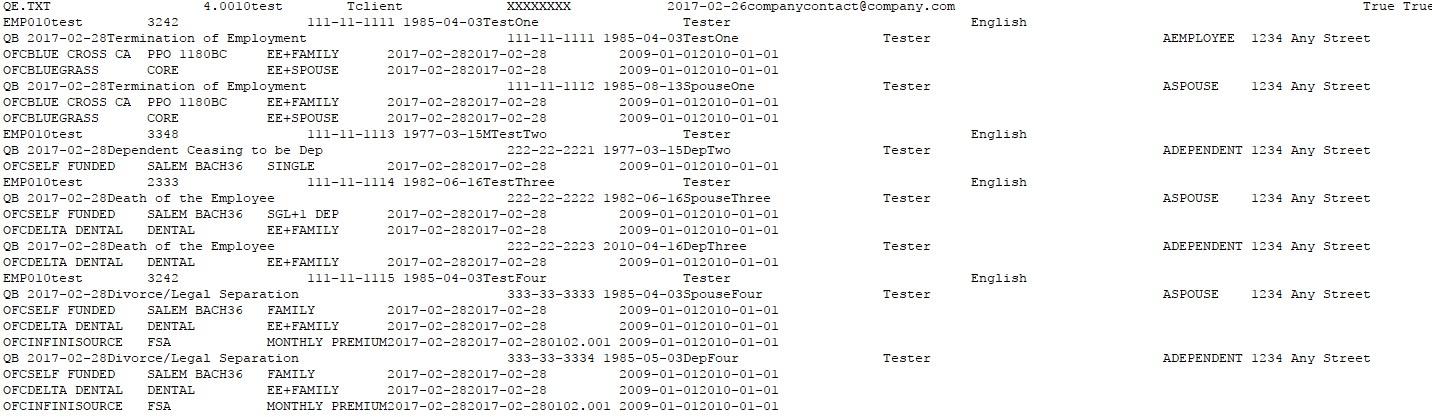
This information is used to produce the Qualifying Event notice and all other notices required to process COBRA.

## File Format Options

EDT files to generate the Qualifying Event Notice consist of a single header record, multiple employee records with multiple Qualified Beneficiary (QB) records attached to each employee record, and multiple offered coverage records attached to the Qualified Beneficiary records. Two format options for EDT files are described below: XML and Flat File ASCII. Either format may be used for Electronic Data Transfer by Secure Data Transfer Web Upload, File Transfer Protocol (FTP/FTPS) or Secured File Transfer Protocol (SFTP).

Flat File ASCII Specification

**NOTE**: A sample of this file layout is available on page one under Related Documents



Unlike XML files, ASCII flat files do not display an obvious logical, physical structure. ACSII flat files rely on very specific starting positions and length for individual data elements, with none of the descriptive tags that are present in XML files.

The one-dimensional nature of the ASCII flat file does not allow for the expression of complex data hierarchies. In addition, unlike XML files, there is no option to validate data in ASCII flat files prior to submission.

## Record and Field Description

Header Record

There is a single Header Record per submitted file. The Header Record identifies the Customer, how to apply COBRA rules for the Customer Company, and how to catalog the data contained in the file in our system.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Header Record** (one record per file) | | | | | |  | |  | |  |  | | | | |  | |
| ***Field Name*** | ***Required?*** | | ***Type*** | | | ***Starting Position\**** | | ***Length\**** | | ***Format*** | ***Description*** | | | | | ***Mapping Notes*** | |
| FileFormat | Yes | | String | | | 1 | | 25 | | Alpha | Identifies the file format to our system. The value must be: QE.TXT | | | | | QE.TXT | |
| FileVersion | Yes | | Numeric | | | 26 | | 3 | | Numeric | Identifies the version number of the specifications used to generate the submitted file. The value should match the version number in the footer of this document (e.g., 4.0). | | | | | 4.0 | |
| CompanyNo | Yes | | String | | | 29 | | 15 | | Alpha numeric | The Customer account number assigned by Infinisource. | | | | | CN99136 | |
| UserID | Yes | | String | | | 44 | | 20 | | Alpha numeric | Assigned account User ID for the person (or Customer) submitting the data. (Used for authentication purposes.) | | | | | Leave blank | |
| Password | | Yes | | String | 64 | | 20 | | Alpha numeric | | Assigned account password for the person (or Customer) submitting the data. (Used for authentication purposes.) | | | | | | Leave blank |
| SubmissionDate | | Yes | | Date | 84 | | 10 | | YYYY-MM-DD | | Date that the data was submitted (YYYY-MM-DD) | | | | | | Today’s date |
| ResponseEMail | | Yes | | String | 94 | | 65 | | Alpha | | Email address to which our system will send a response report. | | | | | | benefits@INPO.org |
| ResponseFAX | | No | | String | 159 | | 12 | | 999-999-9999 | | FAX number to which our system will send a response report, if desired. | | | | | | Leave blank |
| SendNotices | | No | | String | 171 | | 5 | | True/blank | | (*OPTIONAL*) Indicates if notices should be generated for submitted records.  TRUE = generate & send notices | | | | | | TRUE |
| ValidateOnly | | No | | String | 176 | | 5 | | False/blank | | **T E S T I N G**  (*REQUIRED*) Requests validation of the submitted data without saving the records.  TRUE = validate data without saving | | | | | | **Set to TRUE for the TEST session in back office** |
|  | | **P R O D U C T I O N** | |  | | **Set to blank for the SCHEDULED session in back office** |
|  | **NOTE**: After moving to | |  |
| production, this field should be left blank. | |  |

* Starting Position and Length required for Flat File ASCII format.

Employee Record

Each Qualifying Event Notice consists of a single employee record. There can be several Qualifying Event Notices, and thus several employee records submitted in a single file. The employee record is the ‘parent’ of related Qualified Beneficiary (QB) records.

If term due to one of these reasons, do not send the employee, only send the deps losing coverage.

|  |  |
| --- | --- |
| Death of the Employee | edhChangeReason = 210 or EecEmplStatus = T and EecTermReason = 203 |
| Divorce/Legal Separation | edhChangeReason = LEVNT4 or 204 |
| Dependent Ceasing to be Dep | edhChangeReason = 201 |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Employee Record** (one record per event; may be several per file) | | | | | |  |  |
| ***Field Name*** | ***Required?*** | ***Type*** | ***Starting Position\**** | ***Length\**** | ***Format*** | ***Description*** | ***Mapping Notes*** |
| RecordType | Yes | String | 1 | 3 | Alpha | Identifies this is an employee record. Value = EMP | EMP |
| CompanyNo | Yes | String | 4 | 15 | Alpha numeric | The Customer account number assigned by Infinisource. (This will usually be the same as in the header record.) | CN99136 |
| EmployeeNo | No | String | 19 | 20 | Alpha numeric | Employee number or identifier. (Must uniquely identify the employee. The system will retain this value, and use it to prevent duplicate transmission of the same  Qualifying Event record.) | If edhChangeReason = LEVNT4, 204, 210 or 201 send conssn else send Eepssn |
| SSN | Yes | String | 39 | 12 | 333-33-3333 | Social security number | If edhChangeReason = LEVNT4, 204, 210 or 201 send conssn else send Eepssn |
| DOB | Yes | Date | 51 | 10 | YYYY-MM-DD | Date of birth (YYYY-MM-DD) | If edhChangeReason = LEVNT4, 204, 210 or 201 send condateofbirth else send Eepdateofbirth |
| Firstname | Yes | String | 61 | 25 | Alpha | First name | If edhChangeReason = LEVNT4, 204, 210 or 201 send connamefirst else send Eepnamefirst |
| Lastname | Yes | String | 86 | 35 | Alpha | Last name | If edhChangeReason = LEVNT4, 204, 210 or 201 send connamelast else send Eepnamelast |
| Initial | No | String | 121 | 1 | Alpha | Middle initial | If edhChangeReason = LEVNT4, 204, 210 or 201 send 1st digit of connamemiddle else send eepnamemiddle |
| LanguageCode | Yes | String | 122 | 25 | Alpha | The language in which notices should be generated for the QBs involved in this event. ‘English’ is the default language. (Refer to the  *Language Codes* table in the *Support Codes* section of this document for a complete list of available languages.) | English |

* Starting Position and Length required for Flat File ASCII format.

Qualified Beneficiary (QB) Record

Qualified Beneficiary (QB) records are attached to a single employee record. (The QB record is the ‘child’ of the related employee record and the ‘parent’ of related Offered Coverage records.) There may be one or several QB records for each employee record, representing each member of the family eligible for continued coverage.

The employee **may** or **may not** be a QB, depending on the type of event experienced.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **QB Record** (may be multiple records per employee) | | | | | | |  |
| ***Field Name*** | ***Required?*** | ***Type*** | ***Starting Position\**** | ***Length\**** | ***Format*** | ***Description*** | ***Mapping Notes*** |
| RecordType | Yes | String | 1 | 3 | Alpha | Indicates that this is an enrollee record. Value = QB | QB |
| EventDate | Yes | Date | 4 | 10 | YYYY-MM-DD | The date that the Qualifying Event occurred (YYYY-MM-DD) | eepDateOfCOBRAEvent |
| EventCode | Yes | String | 14 | 50 | Alpha | The description of the event. This will determine the duration of COBRA (see codes in the support table provided at the end of this document). | See event code mapping on next to last page |
| SSN | Yes | String | 64 | 12 | 333-33-3333 | Social security number | Eepssn or conssn |
| DOB | Yes | Date | 76 | 10 | YYYY-MM-DD | Date of birth (YYYY-MM-DD) | eepdateofbirth or ConDateOfBirth |
| Firstname | Yes | String | 86 | 25 | Alpha | First name | eepnamefirst or connamefirst |
| Lastname | Yes | String | 111 | 35 | Alpha | Last name | EepNameLast or connamelast |
| Initial | No | String | 146 | 1 | Alpha | Middle initial | 1st digit of EepNameMiddle or connamemiddle |
| RelationCode | Yes | String | 147 | 10 | Alpha | Code indicating how the enrollee is related to the Employee. . (Refer to the *Relationship Codes* table in the *Support Codes* section of this document for a complete list of supported options.) | If employee, send Employee if ConRelationship = SPS or DP, send Spouse  If ConRelationship = CHL, DPC, DIS or STC, send Dependent |
| Address1 | Yes | String | 157 | 55 | Alpha numeric | The street address | EepAddressLine1 |
| Address2 | No | String | 212 | 55 | Alpha numeric | An additional address line | EepAddressLine2 |
| City | Yes | String | 267 | 35 | Alpha numeric | City | EepAddressCity |
| State | Yes | String | 302 | 5 | Alpha | Code representing the state of residence. (**NOTE**: Field is longer than the standard 2-letter US state code to facilitate international codes.) | EepAddressState |
| Zipcode | Yes | String | 307 | 15 | 99999-  9999999 | Postal code (**NOTE**: Filed is longer than the standard 5- + 4-digit US zip code to facilitate international codes.) | EepAddressZipCode |
| CountryCode | Yes | String | 322 | 3 | USA | Code indicating the country of residence; defaults to ‘USA’. (Refer to the *Country Codes* table in the *Support Codes* section of this document for a complete list of supported options.) | USA |
| Disabled | Yes | Boolean | 325 | 3 | Yes, No | Indicates if the QB was disabled at the time of the event; defaults to ‘No’. | If eepIsDisabled or ConIsDisabled = Y send Yes else send No |

* Starting Position and Length required for Flat File ASCII format.

Offered Coverage Record

Offered Coverage records are attached to a single QB record. (The Offered Coverage record is the ‘child’ of the related QB record.) There may be one or several Offered Coverage records for each QB record.

There must be **a separate** Offered Coverage record representing **each** plan offered for continuation coverage for each QB Record.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Offered Coverage Record** (may be multiple records per QB) | | | | | |  |  |
| ***Field Name*** | ***Required?*** | ***Type*** | ***Starting Position\**** | ***Length\**** | ***Format*** | ***Description*** | ***Mapping Notes*** |
| RecordType | Yes | String | 1 | 3 | Alpha | Indicates that this is an enrollee record. Value = OFC | OFC |
| PlanCode | Yes | String | 4 | 15 | Alpha numeric | Describes the top level of the coverage; usually indicates the carrier of the product  (Examples: PRIORITY, National  Dental, PACIFICARE) | If eeddedcode = DEN, CDHP, OAP or OAPN send CIGNA  If eeddedcode = FSA send INFINISOURCE  If eeddedcode = VIS send VSP |
| CoverageCode | Yes | String | 19 | 15 | Alpha numeric | Describes the coverage type.  (Examples: MEDICAL, DENTAL,  VISION, PPO+ MEDICAL) | See mapping on account structure |
| OptionCode | Yes | String | 34 | 15 | Alpha numeric | Describes the coverage level.  (Examples: SINGLE, FAMILY,  EE+CHILDREN, 2 PERSON) | See mapping on account structure – exception - If edhChangeReason = 201 send EE Only |
| LossOfCoverage | Yes | Date | 49 | 10 | YYYY-MM-DD | The date that the QB will lose coverage for the plan (YYYY-MM-DD)  **NOTE**: This may vary by carrier; please consult individual plan documents to determine the applicable Loss of Coverage date. | Eedbenstopdate or dbnbenstopdate |
| EventDate | Yes | Date | 59 | 10 | YYYY-MM-DD | The date that the QB experienced the event for the coverage (YYYY-MM-DD)  **NOTE**: It is possible (however rare) for the event date to vary by coverage; therefore, an event date must be provided for each offered coverage record. | eepDateOfCOBRAEvent |
| Premium | Yes/No | Numeric | 69 | 7 | 9999.99 | If monthly premium rates *have not* been front-loaded, then the rate must be provided here.  If premium rates *have* been frontloaded, this field should be blank; the system will use the most current premium at the time when the Qualifying Event notice is generated.  **NOTE**: Rates not front-loaded must reflect the applicable cost of coverage to the plan, **plus the 2% administrative fee** allowed by law | If eeddedcode = FSA send eedeegoalamt divided by 12 times 2%  Else leave blank |
| DayDue | Yes/No | Integer | 76 | 2 | Numeric | If monthly premium due dates *have not* been front-loaded, then the date must be provided here.  If premium due dates *have* been front-loaded, this field should be blank; the system will use the most current premium at the time when the Qualifying Event notice is generated. | If eeddedcode = FSA send eedbenstopdate plus 1 day |
| WaitingPeriodBegan | No | Date | 78 | 10 | YYYY-MM-DD | The first date of the employee’s official waiting period prior to gaining coverage.  *REQUIRED* field for HIPAA certificates only | Leave blank |
| CoverageBegan | No | Date | 88 | 10 | YYYY-MM-DD | The first date of the employee’s coverage.  *REQUIRED* field for HIPAA certificates only | Leave blank |

* Starting Position and Length required for Flat File ASCII format.

# Support Codes



The tables below detail the support codes required by both file formats (XML and Flat-File ASCII) for the two record types (NE and QB). Support Codes are case sensitive.

**NOTE**: EDT file submissions that do not reflect these exact codes will result in errors in the returned Data Submission Results report. Additional information may be found in the EDT Troubleshooting Guide -– Common Data Exchange Errors.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| |  | | --- | | **Language Codes** | | English | | Spanish | | French | | Polish | | Albanian | | Arabic | | Cambodian | | Chinese Simplified | | Chinese Traditional | | Creole | | German | | Hindi | | Japanese | | Korean | | Laotian | | Portuguese | | Russian | | Serbian | | Tagalog | | Vietnamese | | |  | | --- | | **Country Codes** | | USA | | CAN | | MEX | |
| |  |  | | --- | --- | | **Event Codes** | BchCode where BchIsCOBRAQualifiedEvent = 'Y' | | Death of the Employee | edhChangeReason = 210 or EecEmplStatus = T and EecTermReason = 203 | | Divorce/Legal Separation | edhChangeReason = LEVNT4 or 204 | | Dependent Ceasing to be Dep | edhChangeReason = 201 | | ~~Employee's Layoff~~ |  | | Termination of Employment | EecEmplStatus = T and eectermtype = V | | Involuntary Termination of Employment | EecEmplStatus = T and eectermtype = I or EecTermReason = INV | | Employee's Reduction of Hours | edhChangeReason = 203 | | **Event Codes that typically do not pass via**  **EDT** |  | | ~~Medicare/Reduction of Hours~~ |  | | ~~Medicare/Employee's Termination~~ |  | | Employee's Medicare Entitlement | edhChangeReason = 205 | | Military Leave of Absence | edhChangeReason = 207 | |
| |  | | --- | | **Relationship Codes** | | Employee | | Spouse | | Dependent | | ~~Other~~ | |



# Infinisource Contacts



EDT Specialist

Email: EDT@infinisource.com Phone: 866-350-3040

Customer Response Account Specialist

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# Revision History Log





|  |  |  |
| --- | --- | --- |
| **Revision #** | **Revision Date** | **Reason for Revision** |
| 0 | 22-APR-2003 | Creation of revision log |
| 1.1 | 25-APR-2003 | Added Purpose and Process sections |
| 1.2 | 1-AUG-2004 | Added SendNotices and ValidateOnly nodes |
| 1.3 | 18-JAN-2008 | Added Responsibilities of Each Party section |
| 2.0 | Unknown | Inadvertently not documented |
| 3.0 | 23-FEB-2008 | Added Involuntary Termination of Employment Event Code [American Recovery Reinvestment Act (ARRA)] |
| 3.1 | 25-JUN-2010 | Added Event Code for HIPAA Non-COBRA Los of Coverage |
| 3.2 | 24-AUG-2010 | Corrected Medicare Entitlement Event Code |
| 4.0 | 9-APR-2012 | Cosmetic revision and clarification; added the following sections:   * Related Documents * Index * File Naming Conventions * Infinisource Contacts   Replaced full XML samples with links and screen shots  Added web upload and FTPS screen shots and details Added links where necessary and appropriate. |
| 4.0 | 01-Oct-2015 | Requirement for Qualifying Event Social Security Number and Date of Birth |
| 4.0 | 21-Dec-2016 | Added additional wording to the following sections:   * General EDT Flow Process * Enrollment Events |
| 4.0 | 24-Jan-2018 | * Revised wording for QE Employee number Description * Replaced Web upload screenshots * Replaced full XML samples with links and screen shots |