**P&A COBRA File Feed FAQs**

***General Questions***

**Who are my P&A contacts about a COBRA file feed?**

Your account executive in the COBRA department is the contact for the COBRA benefit and plan information to be reported in a file feed.

Business Analyst in the IT department – The business analyst is the contact about the COBRA file requirements, testing of files before production, and implementation to production.

**What are the steps for a COBRA file feed thru P&A from the initial contact to submitting files in production?**

* The IT department receives information about a company interested in a file feed.
* The COBRA Administrator works with the company to define the plans for the file feed. The plans are unique for each company.
* The Business Analyst sends an email with the documentation to the company about a COBRA file feed.
* A meeting can be scheduled to review the COBRA file and field specifications.
* Programming is completed by the company or vendor per the file specifications.
* An email is sent by the company to the Business Analyst to review test files.
* The test files are reviewed and the Business Analyst will send an email with results of the test file review.
* An email will be sent with pre-production questions and information after the testing has been completed and approved.
* The company is moved into to production.
* The company will begin sending weekly COBRA files to P&A.

**How are COBRA files transmitted to P&A?**

* All test and production files are sent through SFTP.
* Every company is assigned a unique login and password SFTP to submit files.
* The SFTP form is sent in the initial documentation email.
* The SFTP form is to be completed and returned to P&A for the credentials to be setup.
* The SFTP credentials are setup within three business days after P&A receives the completed SFTP form.

**Can encrypted files be sent thru SFTP?**

* Encrypted files can be sent thru SFTP and they will be decrypted by P&A. The encryption key will be provided upon request.
* Encrypted files are to have a .pgp extension in the file name.

Example: COBRA\_999\_YYYYMMDD.csv.pgp

**What does P&A Group charge to process files?**

* There is no cost for P&A to process COBRA files.

***COBRA File and Field Requirements***

**What are the file and field requirements for a P&A COBRA file feed?**

The file and field requirements are defined in the COBRA file layout documentation.

A COBRA file has five record types.

Header (HDR) record – this record is the first line of every file.

Employee Records: There are three record types required for every employee.

* Employee (EMP) record - One EMP record is required for each employee.
* Qualifying Beneficiary (QBR) records - One QBR record is required for every person covered thru COBRA.
* Plan Coverage (PCR) records –The plan information for the beneficiaries are reported in the PCR records. A minimum of one PCR record is required in files.

Trailer (TLR) record – this record is the last line of every file

**What P&A COBRA events are reported in files?**

The COBRA events reported in COBRA files are found in the COBRA event worksheet in the Type 2 File Specification spreadsheet.

**Are the initial and terminations sent in separate files or a combined file?**

It is the company’s preference whether COBRA files are to be sent with the initials and qualifying events for termination in one combined file or in separate files. There are different file names for combined and separate files.

**What are the file names and extensions for COBRA files?**

Files are to be sent as comma delimited with a .csv extension. Examples of the file names are listed, where 9999 is your company number.

Production Files

Combined Initial/General Rights and Qualifying Event file:

COBRA\_9999\_YYYYMMDD.csv

Separate files:

Initial/General Rights file COBRA\_9999\_NH\_YYYYMMDD.csv

Qualifying Event file COBRA\_9999\_QE\_YYYYMMDD.csv

Test Files

The file name is the same with the word TEST included in the name

Combined Initial/General Rights and Qualifying Event file: COBRA\_9999\_TEST\_YYYYMMDD.csv

Separate files:

Initial/General Rights file COBRA\_9999\_NH\_TEST\_YYYYMMDD.csv

Qualifying Event file COBRA\_9999\_QE\_TEST\_YYYYMMDD.csv

**What COBRA events are submitted in test files?**

Test files are to contain the following information.

* We require the relationships of employee, spouse, and children to be tested for the COBRA events in test files.
* We would like to receive dates within the past year in test files.
* The following COBRA events are required to be tested in test files. The sample file has examples of these events to reference.

Initial/General Rights Events

NEW HIRE – when a new employee is enrolling in benefits for the first time.

NEW MEMBER – when a current employee has elected COBRA-eligible benefits for the first time or for the addition of new child or spouse that have elected COBRA-eligible benefits.

Qualifying Events

CEASE-A – when a child turns age 26 and is no longer eligible for COBRA.

DEATH – when the employee has the event of death and there are dependents with COBRA coverage to be offered COBRA.

DIVORCE – when there is a divorce and the spouse is being taken off the COBRA coverage.

TERM – for an employee involuntary or voluntary termination.

**What SSN number is reported for the dependent SSN if the information is not known?**

The dependent SSN is a required field and is to be reported in the QBR and PCR records. Sometimes the dependent SSN is not known to be able to be populated in COBRA files. P&A can accept default SSN numbers only when the SSN is not known in the weekly file.

P&A will accept the following dependent default SSN numbers for dependents when the number cannot be provided.

Spouse: 000-00-0001

Children: Child 1: 000-00-0002

Child 2: 000-00-0003

Child 3: 000-00-0004

Child 4: 000-00-0005

Child 5: 000-00-0006

Child 6: 000-00-0007

Child 7: 000-00-0008

Child 8: 000-00-0009

Additional Children: The last number is incremented by 1 for each child.

***File Processing Questions***

**How often are COBRA files submitted to P&A in production?**

We prefer a weekly file, however we can accommodate different frequencies such as a biweekly file.

**What day of week should the COBRA files be sent to P&A?**

It is each company’s preference which day of week for the COBRA file submission.

**What COBRA information is sent in the weekly files?**

The COBRA coverage in place when the COBRA event occurred is reported in files.

**How will I be notified when a production file has errors?**

COBRA files are processed daily. An email is sent about any missing or incorrect employee information in a production file. Files are held and not processed if more than half the file has data errors. An email will be sent when a file is held with an explanation about the data errors.

**How are the file errors for employees corrected?**

Employees with errors are held and not processed when there is missing or invalid information for an employee in a production file. The errors are to be corrected by either manually adding the employee’s COBRA information in HR Connect or sending the updated information for the employee in the next scheduled file.

**Should a production file be sent if there are no employees to report?**

We expect to receive a file with only a header and trailer record when there are no employees with any changes in the prior week.

**Should full files be sent in a weekly file?**

We expect to receive a weekly change file every week with only the COBRA changes for the previous week.

**Should a census file be sent as the first production file or in a weekly file?**

A census file is not be sent as the first file.

**Should open enrollment plan changes be submitted in production files?**

We do not want to receive any open enrollment plan changes for any employee in a file.

**Can employees be sent in multiple production files?**

An employee is to only be submitted one time for each COBRA event in a production file. A P&A staff member will review the employee information to determine if a notice will be mailed when duplicate employees are sent in files.

***Questions about the Reporting of Specific COBRA Events***

**How are the dependent centered events of divorce, death, and cease-a, submitted in files?**

For the event of Divorce

* The employee information is reported in the EMP record.
* The spouse demographic information is reported in the QBR record and the spouse’s plans are reported in the PCR records.

For the event of Cease-A

* The EMP (employee) record - the employee information is reported.
* The QBR and PCR records is reported with the child’s coverage at the time of the event.

For the event of Death

* An employee with the event of Death is not to be included in a COBRA file when there are no dependents.
* The event of Death for an employee is sent in files only when there are dependents for the employee.

**For terminations, how is the coverage end date and date of the event reported?**

The dates are reported in the QBR and PCR records.

QBR record - The date the event occurred is reported in the Event Date field.

PCR record – There are three date fields in the PCR record.

* Coverage Cease Date – this field is the date the coverage ends and it is a required field. P&A needs to know the ending date of coverage to print the termination notice.
* Event Date - The date the event occurred is reported in the Event Date field.
* Coverage effective date – For Qualifying events, the effective date is to be blank.

**For a new hire or new member event, how is the event date and first day of coverage reported?**

The dates are reported in the QBR and PCR records.

QBR record - The date the event occurred is reported in the Event Date field.

PCR record – There are three date fields in the PCR record.

* Coverage Cease Date – this field is the date the coverage ends. The date will be blank for initial/general rights files. The ending date of coverage is not known for a new hire or new member.
* Event Date - The date the event occurred is reported in the Event Date field.
* Coverage effective date – this field is the date the coverage begins and it is a required date field. P&A needs to know the begin date of coverage to print the initial notice.