



**VIRGINIA BANKERS  
ASSOCIATION**  
Benefits Corporation

# **HEALTH & WELFARE BENEFITS MANUAL**

***FOR ADMINISTRATORS***

UPDATED APRIL 2026

# Table of Contents

INTRODUCTION .....	3
KEY CONTACTS & SUPPORT .....	4
ELIGIBILITY & ENROLLMENT RULES .....	5
BENEFIT WAITING PERIODS & COVERAGE DATES .....	6
BENEFITS OVERVIEW .....	7
MEMBER ID CARDS.....	10
RETIREE COVERAGE.....	11
PARTICIPATION & CONTRIBUTION REQUIREMENTS.....	12
BILLING & ADMINISTRATION .....	13
COMPLIANCE.....	14
HR ADMINISTRATOR RESOURCES.....	16
ANNUAL DISCLOSURE REQUIREMENTS.....	17
OTHER DISCLOSURE REQUIREMENTS .....	20

## **INTRODUCTION**

Welcome to the VBA Benefits Corporation's Health & Welfare Employee Benefits Manual: your primary resource for understanding and administering VBA benefit programs with confidence.

### **Purpose of this Manual:**

This guide provides HR Administrators with clear instructions, key contacts, eligibility rules, and administrative processes to support day-to-day benefits management. Since each member bank may offer different benefit designs and contribution structures, this manual focuses on standardized VBA Benefits Corp. administration processes rather than individualized plan design details. Plan summaries, carrier booklets, forms, and detailed benefit information are available at any time on the VBA Benefits website: <https://www.vabankers.org/explore-employee-benefits>

The following are topics that will be covered in this guide:

- Contact information for both insurance carrier partners and the VBA Benefits Corp staff
- Plan eligibility requirements, participation requirements and special administrative rules
- ACA compliance support
- HIPAA compliance support
- COBRA administration

### **Overview Of VBA Benefits Corporation:**

Since 1946, the VBA Benefits Corp. has delivered high-quality employee benefit programs designed specifically for member banks and financial institutions. Benefits are administered through contracts with leading insurance carriers and service partners under the VBA Insurance and Retirement Trusts. The VBA Benefits Corporation manages all day-to-day benefit operations, including eligibility oversight, carrier coordination, compliance, billing, and employer support.

The VBA Benefits Corp. Board of Directors—made up of leaders from participating institutions—oversees performance, cost management, and vendor relationships to ensure programs remain competitive and sustainable. Selected from participating VBA members, the Board of Directors meets quarterly to review performance goals and to oversee program operations. The Board's purpose is to guarantee that our programs, coverage provisions, and costs are the best programs for their fellow Association members. Our fee structure is designed to cover our operational costs while providing services that are valuable to the Association's members. Our intention is not to make a profit on your employee benefit plans.

Beginning January 1, 2015, VBA medical and dental plans transitioned to a self-funded model, which resulted in creating two VBA-managed Voluntary Employee Beneficiary Association (VEBA) trusts that hold and remit plan premiums:

- The Virginia Bankers Association Medical and Dental Trust; medical and dental coverages.
- The State Bankers Association Group Insurance Trust; fully insured ancillary coverages.

Both trusts are maintained by Old Dominion National Bank, our custodian.

## KEY CONTACTS & SUPPORT

### **VBA Benefits Corporation Staff**

Name	Title	Direct Dial	Email Address
Laurie Milligan	President & COO	804-819-4721	<a href="mailto:lmilligan@vabankers.org">lmilligan@vabankers.org</a>
John Snead	SVP, Member Relations	804-819-4733	<a href="mailto:jsnead@vabankers.org">jsnead@vabankers.org</a>
Pam Connelly	Sr. Director, Benefit Plan Analysis	804-819-4752	<a href="mailto:pconnelly@vabankers.org">pconnelly@vabankers.org</a>
Bobbi Weimer	Sr. Director, Operations & Compliance	804-819-4719	<a href="mailto:bweimer@vabankers.org">bweimer@vabankers.org</a>
Cindy Beazley	Benefits Coordinator	804-819-4705	<a href="mailto:cbeazley@vabankers.org">cbeazley@vabankers.org</a>
Lea Bacharach	Employee Benefits Client Support Specialist	804-819-4749	<a href="mailto:lbacharach@vabankers.org">lbacharach@vabankers.org</a>
Claire Pollock	Retirement Plans Manager	804-819-4712	<a href="mailto:cpollock@vabankers.org">cpollock@vabankers.org</a>

For general inquiries please contact VBA Benefits Corp. at 1-800-643-5599 or [benefits@vabankers.org](mailto:benefits@vabankers.org).

*\*This email address is reserved for HR Administrators only and is not intended to be distributed to employees.*

### **Partners – Effective January 1, 2026**

Benefit	Carrier	Telephone	Website
Medical	Anthem	1 (833) 831-0085	<a href="http://www.anthem.com">www.anthem.com</a>
Pharmacy	Anthem/ CarelonRx	1 (833) 262-1729	<a href="http://www.anthem.com">www.anthem.com</a>
Health Savings Account	Health Equity	1 (866) 346-5800	<a href="http://www.healthequity.com">www.healthequity.com</a>
Dental	Delta Dental	1 (800) 237-6060	<a href="http://www.deltadentalva.com">www.deltadentalva.com</a>
Life	Securian (Minnesota Life)	1 (800) 643-5599 (VBA)	<a href="http://www.securian.com">www.securian.com</a>
Disability (LTD/STD)	Lincoln Financial (Liberty Mutual)	1 (800) 643-5599 (VBA)	<a href="http://www.lfg.com">www.lfg.com</a>
Vision	VSP	1 (800) 877-7195	<a href="https://vba.vspforme.com">https://vba.vspforme.com</a>
Flexible Spending Accounts	Flexible Benefit Administrators, Inc.	1 (877) 532-5478	<a href="https://fba.wealthcareportal.com">https://fba.wealthcareportal.com</a>
COBRA	Flexible Benefit Administrators, Inc.	1 (800) 437-3539	<a href="https://cobrapoint.benaissance.com">https://cobrapoint.benaissance.com</a>
Group Critical Illness	Securian	1 (855) 750-1906	<a href="http://securian.com/vba-insurance">http://securian.com/vba-insurance</a>
Group Hospital Indemnity	Securian	1 (855) 750-1906	<a href="http://securian.com/vba-insurance">http://securian.com/vba-insurance</a>
Group Accident	Securian	1 (855) 750-1906	<a href="http://securian.com/vba-insurance">http://securian.com/vba-insurance</a>
Long Term Care	Trustmark	1 (800) 918-8877	<a href="http://www.TrustmarkVB.com">www.TrustmarkVB.com</a>
Group Legal	MetLife Legal	1 (800) 821-6400	<a href="http://www.legalplans.com">www.legalplans.com</a>
Pet Insurance	Nationwide	1 (877) 738-7874	<a href="http://benefits.petinsurance.com/vabankers">http://benefits.petinsurance.com/vabankers</a>
Total Pet Plan (Discount)	Pet Benefit Solutions	1 (800) 891-2565	<a href="http://www.petbenefits.com/land/vabankers">http://www.petbenefits.com/land/vabankers</a>
Identity Theft	Norton LifeLock	833-915-2356	<a href="https://lifelock.norton.com/">https://lifelock.norton.com/</a>

## ELIGIBILITY & ENROLLMENT RULES

### **Employee Eligibility**

Effective Dates & Eligibility Rules can be defined by each employer, unless carrier restrictions apply, and these can be found in your Group Flexible Benefits Plan Adoption Agreement. Please review your current Adoption Agreement and Flex Plan Wrap Summary Plan Description for more information on these rules and other details.

### **Dependent Eligibility**

Eligible dependents include:

- **Spouse:** the employee's legally married spouse (same or opposite sex).
- **Children:** the employee's or legal spouse's children, including natural children, stepchildren, legally adopted children, or those with legal guardianship / required by law. Dependent children age out of eligibility as follows:
  - Age 19: coverage ends on the last day of the calendar year in which the dependent child turns 19 (if not a full-time student) or 25 (if a full-time student) for the following plans: Child Life and Voluntary AD&D. *Please note that coverages will not be updated until the day after the dependent's birthday.*
  - Age 26: coverage ends on the last day of the month in which the dependent child turns 26 for the following plans: Medical/Dental/Vision/Securian Supplemental Health coverages. *COBRA information will be sent for medical, dental, and vision coverage.*
- **Domestic Partners:** An employee's dependents do not include Domestic Partners, or their dependent children, unless the employer elects otherwise in their Adoption Agreement. Domestic Partners may be the same or opposite sex as the employee. A Domestic Partner relationship will need to be substantiated by the employee and domestic partner by completing an [Affidavit of Domestic Partnership](#).
- **Disabled Dependents Over Age 26:** Employees' disabled dependents may continue to be covered under Medical and Dental after age 26 upon verification of disability. Once the verification has been completed, the dependent's demographic profile should be edited to reflect Disabled status.
  - **Medical:** Anthem requires a Handicapped Dependent Certification form to be completed by a physician to substantiate. Contact the VBA Benefits Corporation to obtain certification.
  - **Dental:** No specific doctor's certification required - relies on the dependent's profile in bswift as verification.

Please navigate to the Compliance – Dependent Verification section (page 15) of this guide to learn more about our Dependent Verification Process.

## BENEFIT WAITING PERIODS & COVERAGE DATES

Employers may select the coverage waiting period, effective date, and termination date for most benefits within their Adoption Agreement so please review that document carefully.

Benefit	Coverage Waiting Period Rule	Coverage Effective Date Rule	Coverage Termination Date Rule		
<b>Medical</b>	90 days or less (per ACA requirements)	<p>The effective date and termination date rules must align for each benefit plan. Specifically, the effective date and the termination date of coverage must both be either:</p> <ul style="list-style-type: none"> <li>• the date of eligibility (such as date of hire) and date of termination; <b>or</b></li> <li>• the first of the month following the employer’s waiting period and end of the month following termination</li> </ul>			
<b>Vision</b>	Employers may select a waiting period within their Adoption Agreement				
<b>Voluntary Benefits</b> (incl. Accident, Critical Illness, Hospital Indemnity, Legal, Total Pet Plan, and Norton LifeLock)					
<b>Basic Life with AD&amp;D</b>				The effective date may be either:	The termination date <b>must</b> be the date the employee loses eligibility (such as employment termination)
<b>Supplemental Life Insurance</b> (incl. Dependent Life)				<ul style="list-style-type: none"> <li>• the date of eligibility (such as date of hire); <b>or</b></li> <li>• the first of the month following the employer’s waiting period</li> </ul>	
<b>Short-Term Disability</b>					
<b>Voluntary AD&amp;D</b>					
<b>Dental</b>		The effective date <b>must</b> be the first of the month following the waiting period	The termination date <b>must</b> be the end of the employment termination month		
<b>Long-Term Disability</b>		The effective date <b>must</b> be 90 days from date of hire	The termination date <b>must</b> be the date the employee loses eligibility (such as employment termination)		
<b>Nationwide Pet Insurance</b>	N/A	Any time ( <a href="#">enrollment done outside of bswift site</a> )			

## **BENEFITS OVERVIEW**

Please refer to the Eligibility & Enrollment Rules section of this Guide and the [VBA website](#) for more information.

<b>Benefit</b>	<b>Carrier</b>	<b>Unique Benefit Plan Information</b>
<b>Medical</b>	Anthem	<ul style="list-style-type: none"> <li>• Employees who work a minimum of 20 hours per week are eligible although employers can set a higher minimum amount via their Adoption Agreement.</li> <li>• Employees who are not actively working cannot stay on the plan for longer than six months.</li> <li>• Board of Directors can be covered only if they receive a W-2 from the employer.</li> </ul>
<b>Pharmacy</b>	Anthem/ CarelonRx	
<b>Dental</b>	Delta Dental	<ul style="list-style-type: none"> <li>• Employees who work a minimum of 20 hours per week are eligible although employers can set a higher minimum amount via their Adoption Agreement.</li> </ul>
<b>Vision</b>	VSP	<ul style="list-style-type: none"> <li>• Employees who work a minimum of 20 hours per week are eligible although employers can set a higher minimum amount via their Adoption Agreement.</li> </ul>
<b>Basic Life with AD&amp;D and Supplemental Life Insurance</b>	Securian (Minnesota Life)	<ul style="list-style-type: none"> <li>• Employees must work a minimum of 30 hours per week to be eligible.</li> <li>• The guaranteed issue (GI) amount of life insurance is the lesser of 5x salary or \$500,000, which is the total combined amount for basic and supplemental life. For amounts greater than \$500,000, evidence of insurability (EOI) is required (health questions requested by insurer). Until EOI is approved, life insurance amounts are capped at \$500,000. The VBA will notify you once the amounts have been approved or denied. <i>Note:</i> Annual salary increases are not subject to EOI.</li> <li>• If an employer offers supplemental life, employees who do not elect coverage at their initial enrollment offering and elect a higher amount of insurance at annual open enrollment will also need to submit EOI.</li> <li>• When an employee terminates employment, basic life, supplemental life and dependent life may be continued as individual policies. Securian will send information directly to all terminated employees outlining their options for continuing coverage. Participants may also utilize <a href="#">Securian's continuation website</a>: Policy Number: 33073 / Access Key: VBA</li> </ul>

Benefit	Carrier	Unique Benefit Plan Information
<p><b>Dependent Life Insurance (Spouse &amp; Child Life)</b></p>	<p>Securian (Minnesota Life)</p>	<ul style="list-style-type: none"> <li>• Employees must work a minimum of 30 hours per week to be eligible.</li> <li>• Spouse life is guaranteed issue (GI) up to \$30,000. If coverage is not elected at initial enrollment and the participant requests a higher amount of insurance at annual open enrollment, evidence of insurability is required. Spouse life coverage cannot exceed 100% of the employee's amount of basic and supplemental life coverage combined.</li> <li>• Spouses who are covered as an employee for basic life of a VBA-participating employer cannot also be covered as a spouse for dependent life. In addition, children cannot be covered under both employees' dependent life coverages.</li> <li>• All amounts of child dependent life are guaranteed issue at each open enrollment.</li> </ul>
<p><b>Short-Term Disability (STD)</b></p>		<ul style="list-style-type: none"> <li>• Fully insured plans only- employees must work a minimum of 30 hours per week to be eligible.</li> <li>• When an employee goes out on Short Term Disability, please direct the employee to the VBA website where they will find directions on how to report a disability claim.</li> <li>• Employers may log into <a href="http://www.MyLincolnPortal.com">www.MyLincolnPortal.com</a> and review their specific employees' information.</li> <li>• Employees who remain disabled longer than their maximum benefit end date will transition to LTD. LFG will transition this employee and will assign them a new LTD case manager.</li> </ul>
<p><b>Long-Term Disability (LTD)</b></p>	<p>Lincoln Financial (Liberty Mutual)</p>	<ul style="list-style-type: none"> <li>• Employees must work a minimum of 30 hours per week to be eligible.</li> <li>• If the 70% LTD buy-up option is offered to employees, the additional 10% will be subject to evidence of insurability (EOI) if employees don't elect the higher amount at date of hire.</li> <li>• If multiple LTD plans are offered and an employee elects a plan with a shorter elimination period, such as moving from the 90 to 60 day option, the plan will be subject to EOI if it's not elected at initial date of hire.</li> <li>• If an employee becomes disabled, please direct the employee to the VBA website where they will find directions on how to report a disability claim. We recommend this is done once the employee has reached the midpoint of his or her elimination period <ul style="list-style-type: none"> <li>○ When claim has been approved, the VBA will notify the employer; LFG will notify the disabled employee.</li> <li>○ Disability benefit checks will be mailed directly to the employee; direct deposit can be requested.</li> </ul> </li> </ul>

Benefit	Carrier	Unique Benefit Plan Information		
Group Critical Illness	Securian	<ul style="list-style-type: none"> <li>• Employees who work a minimum of 20 hours per week are eligible although employers can set a higher minimum amount via their Adoption Agreement.</li> <li>• Available at each open enrollment on guaranteed-issue basis.</li> <li>• Election is for entire plan year; cannot drop mid-year.</li> <li>• Premiums paid on an after-tax basis so benefits will be tax-free.</li> <li>• When an employee terminates from an VBA participating employer, the coverage may be ported to an individual policy.</li> <li>• For Hospital Indemnity plan: No pre-existing condition limitations, including pregnancy, although the first newborn covered under the plan will not have coverage until the first of the month following birth.</li> </ul>		
Group Accident				
Group Hospital Indemnity				
Trustmark	Long Term Care	<ul style="list-style-type: none"> <li>• Employees who work a minimum of 20 hours per week are eligible.</li> <li>• Premiums are paid directly by participating employees to Trustmark.</li> <li>• Coverage is available during the annual off-cycle enrollment held each March.</li> <li>• Employees hired after February 1 must wait until the following year's March to enroll. Guaranteed issue coverage is available to new hires.</li> </ul>		
Group Legal	MetLife Legal	<ul style="list-style-type: none"> <li>• Premiums paid on an after-tax basis so benefits are tax-free.</li> <li>• Election is for entire plan year; cannot drop coverage mid-year.</li> <li>• When an employee terminates from an VBA participating employer, the coverage may be ported to an individual policy.</li> </ul>		
Total Pet Plan (discount plan)	Pet Benefit Solutions	<ul style="list-style-type: none"> <li>• Premiums paid on an after-tax basis so benefits will be tax-free.</li> <li>• When an employee terminates from an VBA participating employer, the coverage may be ported to an individual policy.</li> </ul>		
Identity Theft	Norton LifeLock	<ul style="list-style-type: none"> <li>• Premiums paid on an after-tax basis so benefits will be tax-free.</li> <li>• Election is for entire plan year; cannot drop coverage mid-year.</li> <li>• When an employee terminates from an VBA participating employer, the coverage may be ported to an individual policy</li> </ul>		
Pet Insurance	Nationwide	<ul style="list-style-type: none"> <li>• Available at any time <a href="#">here</a>; enrollment is not done on the bswift site.</li> <li>• Premiums are direct billed to employee.</li> <li>• 10% discount for VBA participants.</li> </ul>		
COBRA	*Flexible Benefit Administrators	<ul style="list-style-type: none"> <li>• <a href="#">COBRApoin portal</a> (administrators only)</li> <li>• *Effective Summer 2026 we will be transitioning to bswift as our COBRA Vendor.</li> </ul>		

Benefit	Carrier	Unique Benefit Plan Information
Employee Assistance Program (EAP)	Anthem (Medical Subscribers)	<ul style="list-style-type: none"> <li>Automatically available to those enrolled in a VBA medical plan.</li> <li>The EAP model includes four visits to a mental health provider; this creates a health plan which means that terminated members must be offered COBRA rights. Since the VBA administers COBRA for our plan participants, we can only meet COBRA obligation requirements for medical plan enrollees.</li> <li><a href="#">Anthem EAP Portal</a> - company code: VBA</li> <li>Visit the <a href="#">EAP page</a> for more information.</li> </ul>
	Lincoln (Disability Subscribers)	<ul style="list-style-type: none"> <li>Automatically available to those enrolled in a VBA disability plan.</li> <li><a href="#">ComPsych Portal</a> – username: LFGSupport / password: LFGSupport1</li> <li>Visit the <a href="#">EAP page</a> for more information.</li> </ul>
Well-Being Programs	Various providers	<ul style="list-style-type: none"> <li>Visit the <a href="#">Well-Being site</a> for more information.</li> </ul>

## MEMBER ID CARDS

Before a participant becomes active in any of the plans, the carriers must first receive our Bswift file which is sent to the carriers on a weekly basis. Therefore, it may take up to 10 business days before the participant's profile is accessible on the various carrier platforms.

There are occasions where the participants may need their Member ID cards before receiving them in the mail. If this is the case, we encourage the participants to reach out to the carrier directly, provided of course there has been adequate time for the data to be uploaded into the carrier's system. HR Administrators may also request copies by sending an email to [benefits@vabankers.org](mailto:benefits@vabankers.org).

- Medical & Prescription Drug:** ID cards are sent to the participant's address on file in bswift after their initial enrollment (unless they opted for digital ID cards). Once participants have received their IDs card(s), we recommended they download Anthem's Sydney app which enables them to download digital ID cards as well as monitor their claims. The participant may log into the [Anthem portal](#) to view, print or download digital ID cards or to request new hardcopies of card(s) to be mailed.
- Dental:** The Dental ID card is sent to the participant address on file in bswift after their initial enrollment. Covered dependents are not issued their own ID card; only one card is issued to the employee/retiree and serves all those covered. The participant may log into the [Delta Dental portal](#) to print or download their digital ID card.
- Vision:** Participants do not receive an ID card; they simply need to inform their provider they are covered by VSP and provide their SSN. The participant may log into the VSP portal to view their enrollment.

## **RETIREE COVERAGE**

*(Available only if elected by the employer on their Adoption Agreement)*

### **Pre-65 Medical:**

- Retirees, age 55 but under 65, with a minimum threshold years of service as chosen by employer (typically 10 years); employer must choose to offer coverage company-wide and premiums calculated as 150% of active rates.
- A retiree's covered spouse under age 65 may keep his or her coverage until age 65.

### **Medicare Supplement:**

- The Hartford/Benistar (Express Scripts)
- Employees or retirees who are Medicare-eligible (age 65 or older) and currently covered under one of the VBA active medical plans are eligible for this benefit.
- Covered spouses over age 65 are eligible if currently covered under one of the VBA active plans AND the employee is not yet Medicare-eligible and covered under the VBA medical plan as an active employee.

### **Retiree Dental:**

- Retirees and spouses who are covered under a VBA dental plan immediately prior to retirement are eligible; spouses cannot elect coverage if the retiree does not also elect coverage.

### **Retiree Vision:**

- Retirees and spouses who are covered under a VBA vision plan immediately prior to retirement are eligible; spouses cannot elect coverage if the retiree does not also elect coverage.

### **Retiree Life:**

- Retirees who are covered under a VBA Benefits Corp. Basic or Supp Life plan immediately prior to retirement are eligible.
- There is no portability offered for Retiree Life coverage.
- Retirees who are less than 70 years old upon retirement can elect up to 33.3% of coverage amount in effect immediately prior to retirement.
- Retirees who are over age 70 at the time of retirement may elect up to 33.3% of the coverage amount in effect immediately before they turned age 70.

## **WAIVER OF PREMIUM (WOP)**

There is a WOP provision in our life insurance contract that allows a disabled employee to continue their life coverages they had in place at the onset of the disability. To be eligible for WOP, the employee must become totally and permanently disabled while under the age of 60.

After the employee has been deemed to be disabled for a period of 9 months, the VBA Benefits Corp. will be notified by Securian that the individual may be eligible for WOP. Upon notification, the VBA Benefits Corp. will begin the WOP application with Securian and will notify the employer. The decision to approve or deny WOP must be made within 12 months from the date of disability.

We recommend that you keep the employee's life insurance coverage(s) in force until the waiver determination has been made by the insurance company.

## PARTICIPATION & CONTRIBUTION REQUIREMENTS

The VBA Benefits Corporation sets participation requirements for our member employers primarily due to the contractual requirements set by the insurance carriers.

COVERAGE	MINIMUM PARTICIPATION REQUIREMENTS
Medical & Prescription Drug	75% participation
Medicare Supplement	None
Dental	75% participation
Vision	None
Basic Life Insurance	100% participation
Supplemental Life	None
Dependent Life	None
Long Term Disability	100% participation; employers can fund through LTD flex credits which can create tax-free disability benefit; however, ALL employees must elect and pay for an LTD option.
Short Term Disability: Employer-paid (Fully Insured)	100% participation
Voluntary	25% participation
Flexible Spending Accounts	None
Group Critical Illness, Accident & Hospital Indemnity	None
Long Term Care	None
Legal Assistance	None
Total Pet Plan	None
Identity Theft	None

## **BILLING & ADMINISTRATION**

### **Monthly Billing Process**

The VBA Benefits Corp. provides a consolidated monthly bill that covers all lines of coverage; we reconcile and remit payment to all carriers. The bills are processed on the 23<sup>rd</sup> of the prior billing month and, because of this, the bswift system will be down on/around the 23<sup>rd</sup> of each month for this process. The VBA Benefits Corp. typically needs a few days to make adjustments before employers can pull the invoice from the bswift system; we will contact employers once the bills are ready to be downloaded.

The billed amount will be drafted via two ACHs within the first business week of every month for administrative fees and premiums for all coverages.

### **Wash Rule**

We utilize the “wash rule” for new hires, terminations and changes:

- If an employee’s coverage is effective on or before the 15th of the month, a full month’s premium will be charged to the employer. If an employee’s coverage is effective on or after the 16th of the month, employers will not be charged a premium.
- If an employee’s coverage terminated and his/her first day of non-coverage is within the first 15 days of the month, employers will not be billed for that month. If an employee’s coverage terminated and his/her first day of non-coverage is after the 15<sup>th</sup> of the month, employers will be billed for the entire month.

### **Mid-year Allowable Changes**

If an employee has a qualified status change, they must notify the employer of the qualified change in status and complete a new benefit election within 30 days of the status change. Any change to the benefit elections as a result of a qualified status change will be prospective to the first day of the month following the benefit election, except in the case of a birth or adoption. An election change with respect to the Medical Plan as a result of a birth or adoption will be retroactive to the date of the birth or adoption, as long as the election for coverage was made within 30 days following the birth or adoption.

### **Death Claims**

When an employee or covered dependent dies, contact the VBA Benefits Corporation for the appropriate claim forms. A certified copy of the death certificate will be required. All completed claims forms must be returned to the VBA Benefits Corp. for benefit certification and submission to the carrier.

## COMPLIANCE

### Affordable Care Act (ACA)

#### Employer ACA Requirements

- Employees who worked an average of 30 hours per week for the previous 12-month period (October-September) must be offered health coverage for the upcoming plan year.
- Employer PCORI Fee and Taxes – VBA Benefits Corp. will pay on your behalf to the IRS.
- Affordable Coverage: Employee contribution for lowest cost health plan cannot be more than 9.96% of taxable income in 2026 and indexed each year by the HHS.
- Sufficiently Valuable Coverage: VBA Benefits Corp.'s health & welfare consultant has verified all VBA Benefits Corp. plans meet the 60% actuarial value threshold.
- Minimum Essential Coverage: VBA Benefits Corp.'s plans provide minimum essential coverage.

#### Employer ACA Reporting Requirements

- Individual Mandate, 1095-B Forms – Used to report certain information to the IRS and to taxpayers about individuals who are covered by minimum essential coverage and therefore are not liable for the individual shared responsibility payment. VBA Benefits Corp. will complete on behalf of employers in plan and they will be accessible through the bswift system. These forms are not needed for employee's tax filings but should be kept for their records.
- Employer Mandate, 1095-C Forms– Filed and furnished to any employee of an Applicable Large Employers (ALE) member who is a full-time employee, as defined by the Affordable Care Act, for one or more months of the calendar year. ALE members must report that information for all twelve months of the calendar year for each employee. ALE is an employer with more than 50 FTEs. VBA Benefits Corp. will complete on behalf of employers in plan and they will be accessible through the bswift system. These forms are not needed for employee's tax filings but should be kept for their records.
- Health Insurance Marketplace Notice – New hires should be provided with a copy of the notice at time of hire. This is a one-time requirement and not required to be reissued annually. *Updated notice on VBA Benefits Corp. website.*
- All active employees covered under the medical plans should receive an annual **Creditable Coverage Notice**, which is particularly important when an employee is getting ready to transition to Medicare Part D. An individual may be subject to a penalty if he or she has not had continuous creditable drug coverage since age 65 and prior to application for Part D. Although this is most important for your active employees aged 65 or over, a spouse or disabled child could be Medicare eligible as well. **Important: As of 1/1/2025, all VBA Benefits Corp. medical plans have been deemed to be Creditable. The Creditable Coverage Notice can be found under Health & Welfare Compliance Health and Wellness Plan Disclosure Requirements on the VBA Benefits Corp. Website.**

## **HIPAA**

The VBA Benefits Corporation is HIPAA-compliant and serves as HIPAA officer for most of our employers, which allows you to remain separated from receiving detailed claims information or protected health information (PHI). We maintain all HIPAA-related documents, including HIPAA Policy, Privacy Compliance Manual, and Business Associate Agreements (BAAs) with our vendors.

We have traditionally found this saves our employers/associate members time and money in having us take on this role. We receive assistance from our outside legal counsel, Williams Mullen, to review and update our policies and procedures, and documents to ensure we are compliant with the law.

## **Non-Discrimination Testing**

The VBA Benefits Corp. partners with MMA to provide Section 125 and 105(h) Non-Discrimination Testing and guidance in the spring each year.

## **Dependent Verification:**

The VBA Benefits Corp. partners with bswift to verify dependent eligibility for the medical and dental plans. This exercise ensures that we are compliant with our benefit plan guidelines and regulations, we can accurately manage healthcare costs and guarantee fair distribution of benefits to employees and their dependents. Please review the [Administrator Guide](#) for more information, and share the [Employee Instructions](#) and [Documentation – Options & Requirements](#) with employees

## **COBRA ADMINISTRATION**

- We include COBRA administration for those employers who participate in our medical, dental, vision and health FSA plans. The COBRA vendor receives weekly files from bswift with information on new hires and terminations. Important reminders include:
  - When you add new hires, the vendor will mail an Initial Rights notice to their home addresses.
  - When employees are terminated, the vendor will mail a COBRA qualifying event election packet to the last home address in the bswift system.
  - When a dependent becomes ineligible, a COBRA notice will automatically be generated and mailed.
  - HR administrators should communicate to terminating employees or ineligible dependents that the COBRA vendor will be mailing a COBRA election packet to their home address and the cost is based on the entire premium (both employer and employee portion) plus a 2% COBRA administration fee.
  - General COBRA rules apply after a qualifying event:
    - Employee and qualified dependents can elect coverage for up to 18 months
    - Under certain circumstances, dependents who become ineligible (for example, dependents who have aged out) can elect coverage for up to 36 months
    - Disabled employees can elect coverage for up to 29 months

For detailed information about COBRA, please refer to the Wrap Health & Welfare Summary Plan Description, customized to your plan offerings, provided by the VBA Benefits Corp.

---

## HR ADMINISTRATOR RESOURCES

The VBA Benefits Corp. offers a comprehensive suite of tools and resources to support HR administrators in managing benefits, policies, procedures, and employee communications. Below is a summary of the available materials.

- **For Your Benefit monthly electronic newsletter:** We attempt to limit the amount of email communications sent throughout the month and send a monthly newsletter that consolidates all important benefits-related matters into one communication. This is currently released on the first Thursday of each month. In September, the frequency changes to weekly due to our annual Open Enrollment activities.
- **Health & Welfare Employer Site:** We created [this site](#) specific for employers to access important Health & Welfare plan documents. Please bookmark it as we update this site on a regular basis with new materials. You will find information such as booklet-certificates, summary of benefits and coverages, sample flyers and templates, compliance documents, and past HR administrator training recordings.
- **Wellbeing Site:** We also created [this site](#) specifically dedicated to wellbeing initiatives. We recommend you bookmark it to keep up to date on our wellbeing activities. You will find quarterly turn-key wellness campaigns, general wellness communications, as well as access to your own wellbeing site through Wellworks for You, which is customizable for each employer.
- **Annual Open Enrollment Site:** During the fall we create a separate open enrollment site where we populate pertinent open enrollment information, materials and templates to assist you in preparing your bank/employer OE activities.
- **LearnYour Benefits (LYB) Site:** You have access to a customizable and video-focused employee benefits communications platform. We will set up your administrator access and can facilitate one-on-one training with [LYB](#) for you to learn more about the platform and how to use it to the fullest extent.

## ANNUAL DISCLOSURE REQUIREMENTS

Notice	Explanation	Entity Responsible	Frequency	Delivery Requirements **
<b>Summary of Benefits and Coverage (SBC)</b>	Four-page uniform description of benefits available at open enrollment. Anthem will provide SBC, banks must distribute to eligible employees. Follow the same distribution guidelines as SPDs. Electronic distribution is acceptable within specific parameters. Paper copies must be available upon request.	VBA Benefits Corp. provides SBCs to bank; Bank will distribute/post to employees	Annual (during open enrollment period); for newly eligible, must be distributed first day of enrollment eligibility. Typically, available on October 1 of each year.	Electronic distribution acceptable
<b>Patient Protection Disclosures</b>	Participants may select any participating provider available to accept them as a patient. A child may elect a provider specializing in pediatric care. Obstetrical or gynecological care may be obtained without a referral or prior authorization.	Anthem includes in booklet-cert; Bank should notify employees of availability	Not defined as annual distribution; must be included with an SPD or other similar description of benefits	Electronic distribution acceptable under guidelines of SBC
<b>HIPAA Special Enrollment and Pre-existing Condition Exclusion Notices</b>	Eligible participants must receive notice of special enrollment rights. Pre-existing condition not applicable to VBA Benefits Corp. plan.	Anthem includes in booklet section labeled "When You Enroll"	Annual (during open enrollment period); for newly eligible, must be distributed at enrollment eligibility.	Email and other internet-based methods are acceptable

Notice	Explanation	Entity Responsible	Frequency	Delivery Requirements **
<b>Women’s Health and Cancer Rights Act (WHCRA) Notice</b>	Requires annual notice to all participants and beneficiaries regarding rights to post-mastectomy breast reconstruction. One notice at initial enrollment, annually thereafter.	Anthem distributes to new participants with ID cards; will also be included in booklet for annual notice.	Annual	Electronic distribution acceptable
<b>ACA Form 1095-B</b>	Reports information about each covered employee to the IRS indicating that Minimum Essential Coverage (MEC) was offered.	VBA Benefits Corp. posts to bswift site for each covered employee to download.	Annual	Electronic distribution acceptable. Employers should send hard copies via USPS to termed or retired employees.
<b>ACA Form 1095-C</b>	Reports lowest cost medical plan and offer of coverage for all full-time employees of ALE who were eligible for one or more months of the calendar year, regardless of enrollment. Sent to IRS	Applicable Large Employers (ALE) who have 50 or more FT or FT equivalent employees. VBA Benefits Corp. posts to bswift site.	Annual	Electronic distribution acceptable. Employers should send hard copies via USPS to termed or retired employees.
<b>Medicare Part D Creditable (or Non-Creditable) Coverage Notice</b>	Employers must provide notice if prescription drug coverage is creditable. Required recipients are Part D-eligible who are “enrolled or seeking to enroll” in the employer’s plan.	VBA Benefits Corp. posts to website; Bank should distribute at open enrollment	Must be provided on or before October 15 of each year and following any changes in creditable coverage status	Electronic distribution is acceptable; however, paper is recommended.

Notice	Explanation	Entity Responsible	Frequency	Delivery Requirements **
<b>Children’s Health Insurance Program (CHIP) Notices</b>	Applicable in a state that provides a premium assistance subsidy under Medicaid or CHIP. Must provide in VA.	VBA Benefits Corp. posts to website; Bank should distribute at open enrollment in a separate and “prominent” document.	Annual (during open enrollment period) <i>Current notice expired: January 31, 2026.</i> <i>As of April 2026, the Department of Labor has not updated the model notice.</i>	Electronic distribution acceptable; must be presented as a separate and prominent document.
<b>Wellness Program Notices</b>	If a wellness program requires individuals to meet a standard related to a health factor in order to obtain a reward, the HIPAA nondiscrimination rules require the program to comply with five conditions, including a disclosure requirement.	May apply based on individual banks’ specific wellness plans if outcomes-based incentives are offered to employees	Effective first day of plan year	Electronic distribution acceptable
<b>Summary Annual Report (SAR)</b>	Must be distributed within nine months after the close of each plan year. If an extension is filed for the plan’s Form 5500, the SAR deadline is also extended.	VBA Benefits Corp. provides to bank with all plans offered; bank must customize to specific benefits offered and distribute.	Annual	Electronic distribution acceptable
<b>Health Insurance Marketplace Notice Requirement</b>	Employers covered by the Fair Labor Standards Act (FLSA) are required to provide notice either electronically or in hard copy.	VBA Benefits Corp. posts sample notice on website; Bank completes and distributes to new hires	At time of hire <i>Current notice expires: December 31, 2026</i>	Electronic distribution acceptable

## OTHER DISCLOSURE REQUIREMENTS

Notice	Entity Responsible	Frequency	Delivery Requirements**
<b>Initial COBRA QE Notice</b>	FBA	Within 90 days of EE enrollment	Electronic distribution acceptable but not recommended.
<b>HIPAA Notice of Privacy Practices</b>	VBA Benefits Corp. will post on website; Bank will distribute to new hires and redistribute if revised	Reminder must be distributed every three years regarding availability of detailed description. <i>Last Updated: September 1, 2025.</i>	Electronic distribution acceptable
<b>Summary Plan Description (SPD)</b>	VBA Benefits Corp. will distribute customized SPD to Bank; Bank will distribute to employees	VBA Benefits Corp. will update customized wrap Flex Plan SPDs each year based on new plan offerings. Booklet-certificates are provided on VBA Benefits Corp. website and are part of the SPD requirement. Employees must receive SPD within 90 days of EE enrollment and again every five years	Electronic distribution acceptable
<b>Summary of Material Modification (SMM)</b>	VBA Benefits Corp. will distribute to Bank; Bank will distribute to employees	Explains plan change for participants (without need to update full SPD). Must be distributed within 210 days after effective date of change.	Electronic distribution acceptable

\*\*General Rules for Electronic Distribution:

- For employees with work-related computer access: an employer may distribute documents and notices electronically without obtaining employee consent.
- For individuals without work-related computer access: an employer must provide paper copies of documents and notices, unless the employee affirmatively consents to electronic distribution beforehand and provides an electronic address.