Common Control for Blue Cross® Blue Shield® of Michigan and Blue Care Network Groups

Groups headquartered IN Michigan:

- Blue Cross will cover any eligible employee of the group, regardless of the state in which they reside/report for work.
- BCN can only write the employees for the group that report to a location in Michigan.
    - This often leads the group to purchase a Blue Cross plan to cover their out-of-state employees.
    - Starting 1.1.21, Blue Elect POS will be available which allows for out of state employees.

Groups headquartered OUTSIDE of Michigan:

- Blue Cross and BCN can cover employees that report to Michigan locations.

Requirements for Submission:

- Common control letter with CPA signature.
- Copy of Federal Tax ID (pre-printed document with Federal Tax ID listed)
    - If common control is not currently recognized by Blue Cross, a copy of the Federal Tax ID is needed for each group listed in the letter.
    - If adding entities to an existing common control group, Federal Tax ID is needed for only the additional entities.
- Multiple location survey (MLS) listing all locations and number of employees enrolling.

Common Control Letter Guidelines:

- The letter must come from a CPA or tax attorney, and must be on their letterhead.
- It must contain the following information:
    - All entities' names and Federal ID numbers that are included in the control group.
    - Indicate which group is the control group (if applicable).
    - Certify that the listed groups meet the IRS definition of a commonly controlled group.
    - State whether the controlled group is a parent-subsidiary or multiple brother-sister company, and site the section of the IRS code that address that relationship.
        - if it is a parent-subsidiary, the letter must indicate the percentage of ownership.

Sample Letter:

(Date)

Blue Cross Blue Shield
Underwriting
Department
600 E Lafayette Detroit Michigan 48226
Attention 514F

To Whom It May Concern:

This letter will certify that all of the following companies meet the Internal Revenue Code Section 414(b) or (c) definition of a commonly controlled group under (Main Group Name) and that they have established one group health plan.

38-xxxxxxx Karen's Flower
Shop 38-xxxxxxx Karen's of Royal
Oak 38-xxxxxxx Karen's of Detroit
38-xxxxxxx Karen's of Marquette

(In this section, indicate whether the companies are parent-subsidiary controlled, brother-sister controlled or other arrangements. Also, identify the section of the IRS code that defines the relationship. Include details of how the group meets the IRS definition. If it is determined to be a brother-sister relationship, please indicate which company is the Headquarters).

Sincerely,
Certified Public Accountant or Attorney signature.