

*Note that if a plan utilizes a COBRA administrator, such administrator will be responsible for many of the following obligations; however, the plan administrator must confirm the administrator's compliance.

Do you:

	Yes	No	n/a
1. Have a group health plan with 20 or more employees on more than 50% of your typical business days in the previous calendar year?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Both full and part-time employees are counted to determine whether a plan is subject to COBRA. Each part-time employee counts as a fraction of an employee, with the fraction equal to the number of hours that the part-time employee worked divided by the hours an employee must work to be considered full time. Note that if you have less than 20 employees, you may still be required to provide continuation of coverage under state law. If you need further information on your state continuation coverage law, please contact your representative for details.

2. Have written COBRA procedures or utilize a vendor that has written procedures?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Include COBRA information in your Summary Plan Description?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Use written notifications to communicate with beneficiaries about COBRA rights?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Update written notifications that communicate with beneficiaries whenever COBRA law changes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Send each employee and dependent spouse an initial COBRA notification to his or her address when first enrolled in your group health plan?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

This initial general notice must be given to each employee and each spouse who become covered under the plan within the first 90 days of coverage. This requirement may be satisfied by including the notice in the SPD and giving the SPD to the employee and to the spouse within this time limit. The Department of Labor has developed a model general notice that single-employer group health plans may use to satisfy the general notice requirement. The model general notice can be found at www.dol.gov/ebsa/modelgeneralnotice.doc.

7. Know which events trigger the right to COBRA continuation coverage and which individuals may be entitled to that coverage?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Qualified Beneficiaries: *a qualified beneficiary generally is an individual covered by a group health plan on the day before a qualifying event who is an employee, the employee's spouse, or an employee's dependent child. In certain cases, a retired employee, the retired employee's spouse, and the retired employee's dependent children may be qualified beneficiaries. In addition, any child born to or placed for adoption with a covered employee during the period of COBRA coverage is considered a qualified beneficiary. Agents, independent contractors, and directors who participate in the group health plan may also be qualified beneficiaries.*

Qualifying Events for Covered Employees (if the event causes them to lose coverage):

- Voluntary or involuntary termination of employment for reasons other than gross misconduct
- Reduction in the number of hours of employment

Qualifying Events for a spouse and dependent child of a covered employee (if the event causes the spouse or dependent child to lose coverage):

- Voluntary or involuntary termination of the covered employee's employment for any reason other than gross misconduct
- Reduction in the hours worked by the covered employee
- Covered employee's becoming entitled to Medicare
- Divorce or legal separation of the covered employee
- Death of the covered employee

In addition to the above, the following is also a Qualifying Event for dependent children (if it causes the dependent child to lose coverage):

- Loss of dependent child status under the plan rules