

Q&A Legal Compliance



Courtesy of Meridian Benefits Consulting

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What are the Qualified Beneficiaries' responsibilities in fulfilling COBRA notification requirements?

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Qualified Beneficiaries must provide the Plan Administrator with notice of the occurrence of the following Qualifying Events:

- Divorce
- Legal separation
- Child's loss of dependent status under the plan
- Second Qualifying Event
- Determination of disability by the Social Security Administration
- Determination by the Social Security Administration that a Qualified Beneficiary is no longer disabled

Qualified Beneficiaries are required to follow the reasonable procedures established by the Plan Administrator for providing these notices, and the Plan Administrator's procedures may not impose time limits which are shorter than those listed below.

- Notice of Divorce, Legal Separation, Loss of Dependent Status & Second Qualifying Events - Qualified Beneficiaries are required to notify the Plan Administrator within 60 days of the later of:
 - The date of the Qualifying Event
 - The date of the loss of health coverage
 - The date on which the Qualified Beneficiary is informed of his or her responsibility to provide notice to the Plan Administrator
- Notice of Disability Determination - Qualified Beneficiaries that are determined to be disabled by the Social Security Administration must notify the Plan Administrator within the original 18-month COBRA continuation period and within 60 days of the later of:
 - The date of the Social Security Administration's disability determination



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- The date on which a Qualifying Event occurs
- The date on which the Qualified Beneficiary loses (or would lose) coverage under the plan as a result of the Qualifying Event
- The date on which the Qualified Beneficiary is informed of his or Notice of Change in Disability Status - Where the Social Security Administration determines that a Qualified Beneficiary is no longer disabled, the Qualified Beneficiary is required to notify the Plan Administrator within 30 days of the later of:
 - The date of the Social Security Administration's determination that the Qualified Beneficiary is no longer disabled
 - The date on which the Qualified Beneficiary is informed of his or her responsibility to provide notice to the Plan Administrator