

Health Connector Policy: Consolidated Omnibus Budget Reconciliation Act (COBRA) /Mini-COBRA

Policy #: **GME-4**

Date revised: **7/18/2017**

Category: **Eligibility**

Effective date: **8/15/2017**

Approved by: **Ed DeAngelo**

Applicable to all products (Qualified Health Plan or QHP/ Qualified Dental Plan or QDP)

The administration of Consolidated Omnibus Budget Reconciliation Act (COBRA)/Mini-COBRA continuation of coverage is the responsibility of the employer group and/or any third party administrator with which the employer group has contracted for such services. In this policy, a “Qualified Beneficiary” is any person who is eligible under law to receive COBRA or mini-COBRA coverage, including a former employee or dependent of a former employee. The employer group and/or its contracted third party administrator is responsible for all of the following activities:

1. Validating that a Qualified Beneficiary is eligible for COBRA/Mini-COBRA coverage;
2. Notifying a Qualified Beneficiary of his/her eligibility;
3. Notifying the Health Connector if a Qualified Beneficiary intends to purchase COBRA/Mini-COBRA coverage through the Health Connector;
4. Notifying the Health Connector if an enrolled COBRA/Mini-COBRA Qualified Beneficiary terminates his/her COBRA/Mini-COBRA coverage;
5. Following established federal and state COBRA/Mini-COBRA guidelines to determine qualifying events and periods of coverage;
6. Determining and collecting, at the employer group’s or third party administrator’s discretion, any administrative or other fees, as permitted by law. The Health Connector will not add any administrative fees to the premiums of COBRA Qualified Beneficiary.

All COBRA/Mini-COBRA Qualified Beneficiary who will be covered must be included in the employer group’s census and enrollment application.

To offer COBRA/Mini-CORBA continuation of coverage to Qualified Beneficiary through the Health Connector, the employer group must maintain at least one (1) active employee in an active small group account with the Health Connector.

Qualifying Events and Coverage Options

1. COBRA/Mini-COBRA Qualified Beneficiary are subject to the same life events and qualifying events as all other eligible employees in Health Connector Small Group plans.
2. Employees covered through an eligible employer who become COBRA/Mini-COBRA Qualified Beneficiary and elect continuation coverage during the plan coverage year must remain on the plan that was in effect on the date that they became Qualified Beneficiary at the same rate and including, at the discretion of employer group or third party administrator, any administrative or other fees, as permitted by law. Enrolled COBRA/Mini-COBRA Qualified

Beneficiary may select a different plan during their employer group's next open enrollment period in the same manner as other eligible employees.

3. Every dependent in the family covered on the day of the qualifying event maintains an independent right to elect COBRA/Mini-COBRA coverage.
4. If a COBRA/Mini-COBRA Qualified Beneficiary elects coverage during their election period but after coverage has been terminated, the Qualified Beneficiary may be reinstated.
5. Dependents of an enrolled eligible employee have the right to continue to receive COBRA/Mini-COBRA coverage if the enrolled eligible employee loses eligibility or cancels his/her COBRA/Mini-COBRA coverage as a result of becoming eligible for Medicare.