COBRA Compliance Checklist

Compliance Guidelines

- Proof of COBRA training
- Written COBRA policies and procedures
- A copy of internal audit procedures for COBRA coverage

COBRA Notices

- General Notice (required when participant first enrolled in plan)
- Qualifying Event Election Notice (required when qualifying event occurs)
- Notice of Unavailability
- Extension Notice (recommended to confirm new period of coverage)
- Premium Billing Notice (recommended as grace period reminder)
- Notice of Early Termination of Coverage
- Notice of Insignificant Premium Underpayment
- Notice of Plan Changes (e.g., open enrollment and rate changes)
- Expiration Notice (recommended to confirm end of COBRA coverage)

Written Procedures

- Premium billing
- Insignificant premium underpayments
- Coverage cancellation (voluntary and involuntary)
- Confirmation of correct election (recommended)
- Reasonable notice procedures for Qualified Beneficiary

Documentation Systems

- Documentation of each notice sent (including proof of mailing)
- Documentation of procedural updates
- Documentation of events reported to employer
- Documentation of payments received

The information contained herein is for general informational purposes only and does not constitute legal or tax advice regarding any specific situation.