

State Continuation Compliance and Notice Requirements

Participant Activity	Employer's Required Actions		Admin America's Actions
An Employee elects a continuation-Eligible benefit for the first time	None - Because the plans are not subject to COBRA, there is no legal requirement for General Rights notices to be issued at the time of enrollment.	=>	None
Employee Experiences a COBRA Qualifying Event: Termination of Employment Reduction of Hours resulting in loss of coverage	Within 30 days of the event or loss of coverage , notify Admin America of the Qualifying Event, plan information, and affected dependents via COBRAPoint Client Portal <i>(Watch for accuracy; a \$10.00 fee will be assessed for re-processing each letter.)</i>	=>	Send a Georgia State Continuation Election Package
Job loss due to gross misconduct	Be extremely careful and always consult legal counsel before categorizing someone as "Gross Misconduct" for Continuation purposes. This will deny Continuation to the participant. It is Admin America's experience that Gross Misconduct is extremely rare	=>	Send the QBs a Notice of Denial of Continuation Due to Gross Misconduct - <i>this notice is not mandatory</i> , however, it does help avoid confusion and limits potential liability
Death of Employee Divorce or legal separation Loss of dependent status	Within 15 days of receipt of notification of the plan change , notify Admin America of the event, plan information and affected Dependents via COBRAPoint Client Portal <i>[On the portal, you will enter a "New QB" and enter the Dependent directly. On the Event tab, choose "Dependent" and the event. Process QB as normal.</i>	=>	Through USPS Proof of Mailing, Send the Dependents (Qualified Beneficiaries) a Continuation Election Notice (Specific Rights Notice)
Termination of Georgia State Continuation: Participant fails to make a timely payment (by the end of the 30-day grace period) Participant voluntarily drops Continuation Participant completes maximum period on Georgia State Continuation	<i>Client is responsible for terminating coverage the carrier(s) and verifying that the carrier(s) have removed participants from future invoices</i>	<=	Admin America will notify the client of the participant's status and need to be terminated via e-mail by the middle of the following month. Termination of COBRA Notice sent to participant
Change in Employee Headcount If your group is not subject to COBRA because of the <20 Full-time employee threshold, this provision should be reviewed annually.	Effective January 1st of each year, calculate the number of full-time employees (or the equivalent combined with part-time employees) employed in the previous calendar year. Notify Admin America of any changes in COBRA Status	=>	Admin America is happy to assist if there are questions as to whether your group is subject to COBRA. However, this decision is ultimately the responsibility of the Plan Administrator. We recommend verifying with your internal legal counsel. Admin America will update the plan status internally. Additionally, we will inform the group about new obligations under COBRA.

Other Communications

Activity	Admin America's Actions	<u>Other's Actions</u>
Participant Elects Continuation	If payment is not received with election, coupons will be issued, and participant will have 45 days to catch up on back payments	Participant makes initial payment
	Participant is elected and paid to current, Admin America will notify carriers to reinstate coverage. Clients will be notified to expect participant to return to carrier invoice	Carrier Enrollment Department updates participant status Client monitors future bills for COBRA Qualified Beneficiaries
Participant and/or providers experience difficulties verifying coverage	Note reinstatements can take 7-10 business days to update by provider: If there is an Access to Care issue; AA will contact the carrier for assistance. AA will assist Providers in verifying coverage as much as possible. If provided, Admin America may contact a carrier account manager or broker for additional assistance.	Carrier Enrollment Department updates status as soon as possible.
Client request participant information	Admin America may direct clients to the COBRAPoint portal to run on-demand reports.	Additional information may be requested to cobra@adminamerica.com
Open Enrollment/ Annual Renewal	Admin America will contact the Plan Administrator and/or Broker prior to the plan's scheduled renewal. If required documentation is received prior to renewal, Admin America will assist with Open Enrollment. <i>(Our Open Enrollment communications will outline these requirements.)</i> Admin America will always pass along rate change information when it is received from the plan administrator.	Plan Administrator and/or Broker must provide completed renewal paperwork to Admin America. If completed renewal paperwork and required materials are not received prior to renewal date, <u>the Plan Administrator will be responsible for performing Open Enrollment with the Qualified Beneficiaries</u> <i>Check for accuracy. A \$20.00 charge per QB will be assessed for reprocessing renewal information.</i>