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New Model COBRA Notices Issued by Department of Labor

As we mentioned in our Client Alert earlier this month, www.shipmangoodwin.com/files/upload/EmplBenNewCOBRALaw.pdf, the Department of Labor was expected to issue new model COBRA notices that contained information about the new COBRA subsidy extension that became law at the end of December. The DOL has now posted those new model COBRA notices on its website, www.dol.gov/ebsa/COBRamodelnotice.html.

The deadlines for complying with the new notice requirements of the COBRA subsidy extension law are fast approaching:

- Persons whose initial COBRA assistance ran out on November 30, 2009, must receive a Premium Assistance Extension Notice on or before **January 29, 2010**.
- Persons who were receiving COBRA assistance as of October 31, 2009, for whom the original COBRA assistance had not run out by November 30, 2009, must receive the Premium Assistance Extension Notice by **February 17, 2010**.
- Persons who were terminated from employment on or after October 31, 2009, and who lost their health insurance after that date must receive the Premium Assistance Extension Notice by **February 17, 2010, UNLESS** they have already been provided an updated General COBRA Notice.

Additional information (fact sheets, Q & A's, flyers and posters) about the requirements of the new law and how to comply appears on the DOL's COBRA website: www.dol.gov/ebsa/cobra.html.

QUESTIONS OR ASSISTANCE?

If you have questions about this alert or would like our assistance in ensuring compliance with the new law, please contact Richard Cohen at (860) 251-5803, or any other member of our Employee Benefits Practice Group listed at left.

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