

ARRA Implementation Checklist



- Identify Assistance Eligible Individuals (AEI's)
 - AEI's are those employees and dependents who were eligible for COBRA based on the employee's involuntary termination during the period September 1, 2008 to December 31, 2009.
- Prepare notice of extended election period and notice of availability of premium reduction for AEI's
 - Note: The DOL will create a model notice by March 19, 2009. We have created the attached sample election notice to individuals requesting coverage now. We recommend you send the official government notice and election form when it becomes available. You will have until April 18, 2009 to notify eligible individuals.
- Send these notices to ALL former COBRA eligible employees terminated from September 1, 2008 to December 31, 2009. (Voluntarily terminated employees have the right to appeal to the DOL if they believe they were involuntarily terminated.)
- Use revised notices going forward with all regular COBRA election paperwork provided to newly enrolled employees and newly COBRA eligible individuals.
- Implement COBRA premium assistance March 1, 2009 for all AEI's requesting coverage
 - See Tracking Worksheet
- Prepare Summary of Material Modification (SMM) to include with employee health, dental and vision coverage booklets.
 - See Sample SMM. We recommend you send this with the DOL Model Notice when available.
- Distribute new forms created by the DOL for the following circumstances (available after 3/19/09)
 - High-Income taxpayer's election to permanently waive COBRA premium assistance
 - AEI notice that he/she is not longer eligible for premium assistance
- Revise COBRA administration procedures to comply with the government's requirements for the premium assistance program.