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**COBRA notice requirements begin long before an employee loses coverage.  
Here's a brief refresher on the beginning of the COBRA process.**

**Q. What is an Initial COBRA Notice?**

Also known as the General Notice, this is a short description of a participant's rights and obligations under COBRA. It is to be furnished when a participant first becomes covered under a plan, to ensure that the participant is aware of the right to elect COBRA if they terminate employment or experience another qualifying event at some point in the future.

It's particularly critical to have provided an Initial COBRA Notice when a covered participant experiences certain qualified events that they must report to their employer.

**Example:** David is employed by Sample Company, and covers himself and his wife Daisy on the Sample Company's group health plan. David and Daisy divorce. As a covered spouse, Daisy has a **right** to COBRA continuation, but also has an **obligation** to inform Sample Company of the event. Daisy could lose her rights to COBRA if she doesn't fulfill her obligation. However, Daisy can only be held to that obligation if she was actually informed that she had the obligation. If not informed, her right to COBRA coverage may extend indefinitely.

**Q. When must an Initial COBRA Notice be sent?**

The Department of Labor's COBRA regulations specify that the Initial COBRA Notice should be delivered within 90 days after the coverage begins. In order to ensure this deadline is met, BPC asks that employers inform BPC of new coverage for employees or spouses within 30 days from the start of coverage.

**Q. Who needs to receive an Initial COBRA Notice?**

All covered employees and spouses must receive an Initial COBRA Notice once their coverage first begins. A single notice may be sent to both the employee and spouse, if they become covered at the same time. If the employee's spouse becomes covered later than the employee – either because the employee has just married or simply because the spouse is not initially covered on the plan – then an additional notice should be sent on behalf of the spouse.

**Q. How do we notify BPC when an employee or spouse needs to receive an Initial COBRA Notice?**

BPC will send compliant Initial COBRA Notices whenever needed, and keep detailed mail records to demonstrate that mailing. Of course, BPC can only send those notices after you provide information about who needs them. Whenever an employee or spouse first becomes covered under your benefit plans, you can notify BPC of the employee's name and address by completing the Initial Notice Template and uploading it via BPC's secure website. In some cases, BPC may also be able to coordinate with your payroll vendor or health insurance to receive some or all Initial COBRA Notice information automatically.

**For more information, contact BPC today!**