

During the Open Enrollment period, COBRA Qualified Beneficiaries (QBs) must be provided the same opportunity to select coverages that are being offered to active similarly situation employees. This requires an open enrollment notification to inform QBs of the open enrollment period, all the options available, monthly premium rates for each option and the open enrollment deadline date. It is important that Open Enrollment notifications be provided to the following:

- Possible electees – individuals in their 60-day COBRA election period.
- Electees – individuals who have elected but have not yet paid during the 45-day initial COBRA payment period.
- Continuees – individuals who have elected and paid for COBRA.

This information is best sent before the open enrollment period starts. Detailed plan information, including a summary plan description, can be included with the open enrollment notification. If you would like Infinisource to assist with this process, please reach out to your Customer Support Representative for more information.

What should you do when there is a Qualifying Event and Open Enrollment – at the same time? Infinisource has provided the below guidance for these participants to assist with the confusion of multiple notifications and actions required to meet all obligations.

An employer is still required to provide a COBRA Continuation Notice when an event occurs. When it occurs during an Open Enrollment Period, Infinisource recommends listing the current plan the participant was enrolled and any new plans that would be available due to the Open Enrollment period. To assist with confusion, we recommend adding an Offered Coverage Note to the COBRA notification to assist the participant(s) with information on the changes that are occurring and the available plans that are being offered during this Open Enrollment Period.

Suggested Offered Coverage Note (insert your information in the highlighted areas):

Effective **MM/DD/YYYY**, all plan participants of **{{Company Name}}** (including COBRA Qualified Beneficiaries) will be required to enroll in group health plans. The plans listed in the table above represent the plans in which you would be eligible to enroll, including your current enrolled plan and any new plans being offered with Open Enrollment. If your loss of coverage date is prior to **MM/DD/YYYY**, select the prior plan that you were enrolled and then, you may also select a new plan to begin after **MM/DD/YYYY**. Make clear notations of your choices on your COBRA election form prior to submitting to Infinisource. To obtain a Summary of Benefits and Coverage for any plan listed above, please contact **{{Contact Name}}** at **{{XXX-XXX-XXXX}}** or via email at **{{Email Address of contact}}**.

Qualifying Event Online Form (See below print screen for where to “check” the box to view the Offered Coverage Note section and where to add your Open Enrollment information as an Offered Coverage Note.)

If your situation is different due to an acquisition or merger, please reach out to a Customer Support Representative at 866-320-3040 or via email at crmail@infinisource.com for assistance with wording.

Some tips to remember during Open Enrollment:

- Provide Infinisource with your updated plans and rates. Premiums for each determination period must be calculated and fixed by the group health plan before the determination period begins.
- A QB may add a spouse, dependent or domestic partner to the plan if active employees can make those same changes. Anyone added will be a Covered Individual and will not have the same independent election rights as your QB's.
- The QB has the option to elect other types of coverage available under the group health plan. If Infinisource does not process your Open Enrollment, it is essential you notify Infinisource of any plan changes that participants made during Open Enrollment.
- Open enrollment is an opportunity to verify that QBs are being charged the accurate premium amount for COBRA. Please take time to audit your Infinisource Participant Status Report for participants who have enrolled or removed from the plan. Audit your Infinisource Premium Remittance Report to confirm that all rates are being charged the accurate premium amounts.
- Review your Health Flexible Spending (FSA) arrangements. If the health FSA is a HIPAA-excepted benefit, the employer may only need to offer COBA when the FSA account is underspent, then the COBRA obligation ends at the end of the first plan year. If the COBRA period is also covered by USERRA because of a military leave of absence, the employer must continue to offer the health FSA.

For assistance with your Open Enrollment by Infinisource, please reach out to your Customer Support Representative at 866-320-3040 or via email at crmail@infinisource.com.