

COBRA Premium Subsidy (amended December 19, 2009)

Under the American Recovery and Reinvestment Act of 2009 (ARRA), certain individuals who are eligible for COBRA continuation health coverage, or similar coverage under state law, may receive a subsidy for 65 percent of the premium. These individuals are required to pay only 35 percent of the premium.

The subsidy applies to large group medical and dental plans covered by COBRA, federal and state government plans, and small employer plans of less than 20 full-time employees not covered by COBRA, but may be covered by comparable state laws. For groups of less than 20 full-time employees, check with your State Department of Insurance to determine whether it has a state continuation of coverage provision.

Eligibility: Employees who are involuntarily terminated (except for gross misconduct) between September 1, 2008 and February 28, 2010 (extended from December 31, 2009), and spouses and dependents associated with eligible employees, can receive the premium subsidy if they elect continuation coverage.

Duration: The subsidy continues until the earlier of: 1) 15 months (extended from nine months)*, 2) the date the individual becomes eligible for coverage under another group dental plan, or 3) the date COBRA coverage would otherwise end. Individuals must notify the plan when they become eligible for other coverage or financial penalties will be incurred.

Payment and Tax Implications:

For groups of 20 or more full-time employees – Securian Dental plans will bill the employer for 100% of the premium; the employer is responsible for billing the former employee 35% and applying for the 65% subsidy. The employer may recover the subsidy by taking it as a credit on its quarterly employment tax return. Credit is only available after receipt of the 35% premium payment from the individual. Employers and plan administrators may be required to report subsidies to the IRS and to individuals who received them. In the rare exception case in which we bill the former employee directly (employee must qualify for subsidy and group must notify us), Securian Dental plans will bill the employee 35% and bill the group 65%.

For groups of less than 20 full-time employees – If you reside in a state that has its own continuation of coverage law, Securian Dental plans will bill the employer 35% of the premium. Securian Dental plans will then apply for the 65% subsidy. If you have employees who qualify for the subsidy, you must notify Securian Dental plans by submitting a “COBRA Election Form for ARRA.” This form is available at www.securiandental.com; click on Group Administrators > Forms and Literature. Failure to submit the form may cause processing delays and inaccurate billing. Please note that in the rare exception case in which we bill the former employee directly (employee must qualify for subsidy and group must notify us), Securian Dental plans will bill the employee 35% and apply for the 65% subsidy.

Please note that there are no changes to COBRA eligibility, election, payment processing and reporting.

IMPORTANT: For complete information, consult with your tax attorney or financial adviser and/or visit www.irs.gov. In the “Search” box, enter “COBRA Health Insurance Continuation Premium Subsidy.”



Dear COBRA participant,

The COBRA subsidy, under the American Recovery and Reinvestment Act of 2009 (ARRA), was amended on December 19, 2009. The amendment extended the subsidy period from nine months to 15 months.

Specifically, the subsidy continues until the earlier of: 1) 15 months (extended from nine months), 2) the date the individual becomes eligible for coverage under another group dental plan, or 3) the date COBRA coverage would otherwise end. Individuals must notify the plan when they become eligible for other coverage or financial penalties will be incurred.

If you were paying the reduced COBRA subsidy premium and then after the original nine-month period began paying the full premium, you are entitled to a refund or credit against future months of coverage. Please contact the human resources or payroll department at your former employer to receive a refund or credit for overpayment.

Sincerely,

Securian Dental Plans