



August 27, 2024

TO: AT&T SE Local Presidents, District 3 Staff, & Secretaries

FROM: Nicholas E.M. Hawkins, Assistant to the Vice-President

SUBJ: COBRA Continuing Coverage Procedures

A number of questions have arisen regarding the procedures and timelines for employees on strike who wish to elect continuing health coverage under COBRA. This is to summarize the procedures and timelines that will apply if the Company terminates coverage on or after September 1.

COBRA requires an employer to provide notice of continuing coverage in the event of a “qualifying event”, such as discharge, death of the employee, divorce, or a “reduction in hours”. A strike or lockout resulting in employees being out of work qualifies as a “reduction in hours” that triggers COBRA coverage.

Once the qualifying event has occurred and the insurer or health plan administrator is notified of that qualifying event, the employer has 14 days to provide notice to affected employees of their right to elect continuing coverage. That notice will include information about the coverage, dates by which employee has to respond, and contact information for the employer or plan administrator for COBRA issues.

Once the employee receives the notice of their right to elect continuing coverage, the employee has 60 days to elect coverage; that is, to notify the employer or plan administrator that he or she wants to continue coverage.

Once the employee notifies the employer or plan administrator of the decision to elect continuing coverage, the employee has 45 days to pay the premiums back to the date that coverage was cut off.

To summarize:

- * employer or plan administrator must notify employee of COBRA continuing option with 14 days after “qualifying event”.
- * employee has 60 days from notice to elect continuing coverage, if they choose.
- * employee then has 45 days to pay premiums for the continuing coverage. The employer can charge up to 102% of the premium amount for continuing coverage.

cc: Richard Honeycutt, Vice-President, CWA District 3
William O’Dell, Administrative Director to the Vice-President
Kelvin Banks, Administrative Director to the Vice-President
Robert Weaver, District 3 Legal Counsel