

## Adult Child

## Information and Questionnaire

The Patient Protection and Affordable Act and Affordable Care Act (PPACA) and the Health Care and Education Reconciliation Act (HCERA) regulations prohibit plans from defining "dependent" in terms other than the relationship between a child and a participant. Thus, factors such as residency, financial dependence, student status, marriage or employment cannot be used in determining a child's eligibility, whether the child is a minor or an adult. In addition, the terms of the plan cannot vary based on the age of a child, except for children age 26 or older. Plans are not required, however, to cover a child's spouse or children.

**Please complete a questionnaire for each program administered by BenefitHelp Solutions (BHS) and return to BHS by June 1, 2010. Please fax at 503-765-3442 or email to [manm@benefithelpsolutions.com](mailto:manm@benefithelpsolutions.com).**

COBRA                       Retiree                       Premium Administration

Employer: \_\_\_\_\_

Many carriers and self funded plans are changing their definition of an eligible dependent prior to the required effective date: the first carrier renewal following September 23, 2010.

Please provide the information below so that we can accurately administer services for your group.

### Plan Terms:

Q. Will your plan allow dependents that would otherwise lose coverage due to exceeding the current dependent age to stay on coverage?

Medical Plan: \_\_\_\_\_ Carrier: \_\_\_\_\_ Effective Date: \_\_\_\_\_

Dental Plan: \_\_\_\_\_ Carrier: \_\_\_\_\_ Effective Date: \_\_\_\_\_

Vision Plan: \_\_\_\_\_ Carrier: \_\_\_\_\_ Effective Date: \_\_\_\_\_

Will the plan allow dependents that may have other group coverage to stay on the plan?  Yes  No

Q. Will your plan allow dependents that were dropped before the above date to come back on the plan before your next plan renewal and open enrollment?  Yes  No

If yes, please explain the rules and the process: \_\_\_\_\_

Q. When will your plans be changing the definition of an eligible dependent to include Adult Children for plan renewal and Open Enrollment rights?

Medical Plan: \_\_\_\_\_ Carrier: \_\_\_\_\_ Effective Date: \_\_\_\_\_

Dental Plan: \_\_\_\_\_ Carrier: \_\_\_\_\_ Effective Date: \_\_\_\_\_

Vision Plan: \_\_\_\_\_ Carrier: \_\_\_\_\_ Effective Date: \_\_\_\_\_

**Adult Child Enrollment Notice at plan renewal/open enrollment** Children who become eligible to enroll as a result of this coverage requirement must be given written notice of their enrollment rights no later than the first day of the first plan year beginning on or after September 23, 2010. Notice provided to the employee counts as notice to the employee's children. The notice may be provided with other enrollment materials distributed to employees, if the notice is prominent.

Q: When will your Adult Child Enrollment Notices be mailed: \_\_\_\_\_?

Please send BHS a copy of your notice so our customer service representatives can assist your members.

Adult Children must be given at least 30 days to enroll, regardless of whether the plan otherwise offers an open enrollment period. This right applies not only to children who were on the plan and aged out, but also to those who were not previously enrolled or eligible.

Q. What are the dates for the Adult Child open enrollment?

From \_\_\_\_\_ to \_\_\_\_\_ for an effective date of \_\_\_\_\_.

Coverage elected must be effective no later than the first day of that plan year--retroactively, if necessary.

Q. What is the latest date that the enrollment form will be accepted? \_\_\_\_\_

Q. What is the latest date that the enrollment form can be postmarked? \_\_\_\_\_

Q. If you will be allowing late enrollment, please explain the rules and the process:

### **COBRA Qualified Beneficiaries at plan renewal/open enrollment**

An example in the regulations illustrates that *a child under age 26 who is currently on COBRA (after losing dependent status under the plan) and whose parent is an active employee, must be allowed to enroll in the plan for "regular" (non-COBRA) coverage. If the child does so, he or she may be entitled to COBRA again later, which could be for a 36-month period following a loss of eligibility related to turning age 26.*

Q. Will you enroll the Adult Children on active coverage if there is a parent on or eligible for active coverage? Yes No If no, please explain: \_\_\_\_\_

Q. If there is not a parent on or eligible for active coverage will the Adult Child be allowed to enroll on COBRA coverage under the parents that is currently on COBRA or Retiree coverage?

Yes No If no, please explain: \_\_\_\_\_

### **Special Enrollment Rights – Same Benefit/Same Price at plan renewal/open enrollment**

Any child enrolling in a group health plan under this mandate must be treated as a HIPAA special enrollee and must be offered all of the benefits that are available to similarly situated individuals who did not lose coverage because of a loss of dependent status. *If the parent must be enrolled in order for the child to take advantage of the special enrollment opportunity, then the un-enrolled parent must be allowed to enroll. Also, an enrolled parent must be allowed to switch benefit options.*

Q. If the only plan available is the parent's COBRA or Retiree plan and the parent wishes to switch plans will your group allow changes? Yes No

If yes, what are the timelines for making a plan change request? From \_\_\_\_\_ to \_\_\_\_\_

Q. What is the latest date that the enrollment/change form will be accepted? \_\_\_\_\_

Q. What is the latest date that the enrollment/change form can be postmarked? \_\_\_\_\_

Q. If you will be allowing late change requests please explain the rules and the process:

Additional comments and considerations:

Information Provided by: \_\_\_\_\_

Title: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email Address: \_\_\_\_\_

Date: \_\_\_\_\_