

New Hire Benefit Checklist

Document	Requirements	Best Practice	✓
CHIP Notice	If an employer's group health plan covers residents in a state that provides a premium subsidy, the employer must send an annual notice about the available assistance to all employees residing in that state.	Distribute to new hires within 14 days from date of hire and annually at open enrollment	
COBRA Initial Notice	Plan administrator must provide generally within 90 days of when group health plan coverage begins.	Distribute to new hires within 14 days from date of hire	
HIPAA Special Enrollment Notice	Plan administrators must provide at or before the time an employee is initially offered the opportunity to enroll in the group health plan.	Distribute to new hires within 14 days from date of hire	
Marketplace Exchange Notice	Employers are required to provide the notice to each new employee at the time of hiring. The Department of Labor will consider a notice to be provided at the time of hiring if the notice is provided within 14 days of an employee's start date.	Distribute to new hires within 14 days from date of hire	
Medicare Part D Notice	<p>At a minimum, must be provided by the plan sponsor at the following times:</p> <ul style="list-style-type: none"> • Prior to the Medicare Part D Annual Coordinated Election Period—Oct. 15 through Dec. 7 of each year; • Prior to an individual's Initial Enrollment Period for Part D; • Prior to the effective date of coverage for any Medicare eligible individual that joins the plan; • Whenever prescription drug coverage ends or changes so that it is no longer creditable or becomes creditable; and • Upon request by a Medicare Part D eligible individual. • If the plan sponsor provides notice to all participants annually, CMS will consider 1 & 2 above to be met. "Prior to" means in the prior 12 months. 	<p>Medicare Part D creditable coverage disclosure notices must be provided to participants before the start of the annual coordinated election period, which runs from Oct. 15-Dec. 7 of each year. If your open enrollment falls before October 15th, it is recommended that you distribute this notice with your open enrollment materials</p>	

<p>Summary of Benefits & Coverage (SBC) (group medical plan)</p>	<p>Plan administrator and issuer must provide to participants and beneficiaries at the following times:</p> <ul style="list-style-type: none"> • With any written application materials distributed for enrollment; • If written application materials for enrollment are not provided, no later than when the participant is first eligible to enroll in coverage; • By the first day of coverage, if there was any change to the information that was provided upon application and before the first day of coverage; • To special enrollees, no later than the deadline for providing the Summary Plan Description (SPD); • Upon renewal, if participants and beneficiaries must renew to maintain coverage; and • Upon request. 	<p>Distribute to new hires within 14 days from date of hire and annually at open enrollment (and upon request)</p>	
<p>Summary Plan Description (SPD)</p>	<p>Plan administrator must provide to participants at the following times:</p> <ul style="list-style-type: none"> • Automatically to participants within 90 days of becoming covered by the plan (though a new plan has 120 days after becoming subject to ERISA to distribute SPD); • Updated SPD must be furnished every 5 years if changes made to SPD information or plan is amended; • If not changes have been made or amended, SPD must be furnished every 10 years. 	<p>Distribute to new hires within 90 days from date of hire</p>	
<p>Women’s Heath and Cancer Rights Act</p>	<p>Plan administrators and issuers must provide notice upon enrollment in the plan and annually thereafter.</p>	<p>Distribute to new hires within 14 days from date of hire and annually at open enrollment</p>	