Survivor Health Benefits Policy
Continuation of Health/Dental Benefits
For Surviving Dependents of Active Employees
Revised as of 8-1-2011

Background:
When an active employee dies, coverage for the surviving spouse and eligible dependent children under Washington University’s health and dental plans may continue for a period of up to three years in accordance with federal COBRA regulations. This policy establishes guidelines for continuation of coverage of surviving spouses and eligible dependent children under the University’s health and dental plans beyond that which is required under federal COBRA regulations.

Death of Employee who does not meet the eligibility requirements for retiree benefits as of the date of death (i.e., at least age 55 and meets the rule of 65):

1. If the surviving spouse is under age 52 as of the employee’s date of death, the surviving spouse and eligible dependent children who were covered as of the date of death will be eligible to continue their coverage at the same premium rates applicable to active employees for one year. At the end of that one-year period, the surviving spouse and eligible dependent children will be eligible for coverage continuation at COBRA rates for up to an additional three years, in accordance with federal COBRA regulations.

2. If the surviving spouse is over age 52 as of the employee’s date of death, the surviving spouse and eligible dependent children who were covered as of the date of death will be eligible for COBRA continuation coverage and may extend that coverage beyond the three years required by federal law, until the surviving spouse attains age 65 or until the surviving spouse and/or dependent children otherwise lose eligibility for continued coverage, if sooner.

3. If there is no surviving spouse but there are surviving eligible dependent children as of the employee’s date of death, those surviving children who were covered as of the date of death will be eligible to continue their coverage at the same premium rates applicable to active employees for one year. At the end of that one-year period, the surviving eligible dependent children will be eligible for coverage continuation at COBRA rates for up to an additional three years, in accordance with federal COBRA regulations.

Death of Employee who meets eligibility requirements for retiree benefits as of the date of death (i.e., at least age 55 and meets the rule of 65):

1. If the surviving spouse is under age 52 as of the employee’s date of death, the surviving spouse and eligible dependent children who were covered as of the date of death will be eligible to continue their coverage at the same premium rates applicable to active employees for one year. At the end of that one-year period, they will be eligible for coverage continuation at COBRA rates for up to an additional three years, in accordance with federal COBRA regulations. The surviving spouse may enroll in the University’s
retiree health plan at the expiration of the three-year federal COBRA continuation period, during an Open Enrollment period, or as a result of a qualifying event (e.g., loss of other coverage). The surviving spouse may cover eligible dependent children of the deceased employee under the University’s retiree health plan.

2. If the surviving spouse is over age 52 as of the employee’s date of death, the surviving spouse and eligible dependent children who were covered as of the date of death will be eligible for COBRA continuation coverage and may extend that coverage beyond the three years required by federal law, until the surviving spouse attains age 65 or until the surviving spouse and/or dependent children otherwise lose eligibility for continued coverage, if sooner. The surviving spouse may enroll in the University’s retiree health plan at the expiration of the extended COBRA coverage, during an Open Enrollment period, or as a result of a qualifying event (e.g., loss of other coverage). The surviving spouse may cover eligible dependent children of the deceased employee under the University’s retiree health plan.

3. If there is no surviving spouse but there are surviving eligible dependent children as of the employee’s date of death, those surviving children who were covered as of the date of death will be eligible to continue their coverage at the same premium rates applicable to active employees for one year. At the end of that one-year period, they will be eligible for coverage continuation at COBRA rates and may extend the COBRA continuation coverage beyond the three years required by federal law, until they otherwise lose eligibility for continued coverage.

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