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Requests for Information Regarding Electronic Disclosure by Employee Benefit Plans

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General Comment

Hello,

I am currently the COBRA administrator for over 150 companies and I also have a background in technology based support. I think it would be a very good move to allow Electronic Disclosure for Employee Benefit Plans (including COBRA notices) provided that a similar system is in place for tracking the notices sent and delivered. (a tracking receipt request is easily added to any email sent)

For COBRA specifically, I would say you would need to keep adequate records that the notice was delivered (an easily backed up receipt folder should be sufficient) and read electronically with three attempts at the electronic delivery. (The employees should be notified to be on the lookout for the electronic notification)

If no "read receipt" (delivery receipt is not enough) is received on the third attempt, then a paper notice should be sent as normal.

Thank you.