

What is the purpose of the Initial COBRA Notice?

The statute requires the “group health plan” to provide notice. The definition of group health plan, however, does not identify any particular party. Most commentators have assumed that the plan administrator has the obligation to provide the initial notice, because ERISA § 502 (c)(1) makes the plan administrator liable for a \$110 per day for failure to distribute the initial notice. The Department of Labor assigns the responsibility to the plan administrator.
