



**GEAUGA PARK
DISTRICT**

August 2, 2021

Geauga County Board of Commissioners
James W. Dvorak
Timothy C. Lennon
Ralph Spidalieri
470 Center Street, Building 4
Chardon, OH 44024

Re: Termination of Health Care Coverage for Geauga Park District Employees

Dear Commissioners:

We made a request to be on the agenda for your Tuesday July 20th Board meeting to discuss issues related to your termination of the health care coverage for Geauga Park District (GPD) employees effective July 1, 2021. Just prior to the meeting, both myself and Park Board Commissioner Howard Bates were contacted by Commissioner Jim Dvorak asking to revisit this topic at a later time. There was a mutual agreement to do so. At this time, I am requesting to revisit this topic. I am detailing our concerns in this letter and requesting a prompt response.

The first question is why was health care coverage terminated for GPD employees? A resolution by the Board of Park Commissioners adopted at their May 10, 2021 meeting and shared with your office expressed a desire to remain a part of the Commissioners healthcare plan. Furthermore, we would like to know what specific provision of the Healthcare Plan (the "Plan") required that health care coverage for GPD employees must be terminated? If no specific provision of the Plan required termination, was this a policy decision? If so, who made that decision and how did they arrive at the decision? From our perspective, there was no basis to terminate the coverage. It has been suggested that the GPD's decision to become self-fiscal mandated that coverage be terminated, but we see no language in the Plan to support that GPD's decision to become self-fiscal caused the covered employees to no longer be eligible under the Plan.

Second, when COBRA notices were issued to GPD employees, those notices identified "voluntary termination" as the qualifying event giving rise to COBRA continuation coverage. Who determined that the Commissioners' decision to terminate health care coverage for GPD employees was a "voluntary termination" under COBRA? Was any legal opinion or guidance issued on this point? We believe the "voluntary termination" designation is improper. A "voluntary termination" occurs for purposes of COBRA when an employee terminates employment. Here, the employees in question remained GPD employees, they did not terminate their employment with GPD, and it was the Commissioners who decided to terminate coverage.



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Your decision to abruptly terminate health care coverage for GPD employees caused significant hardship. Many employees attempted to have much needed prescriptions filled and they were advised that they did not have coverage. Many of those prescriptions could not be filled because the costs without any health care coverage in place was exorbitant. Keep in mind, the GPD remained ready, willing, and able to continue to pay health insurance premiums for all of its employees under the Plan and even offered to do so one month in advance.

We hope you can provide answers that shed some light on how and why these decisions were made. We look forward to hearing from you.

Sincerely,

John Oros, Executive Director

Cc: Board of Park Commissioners
Gerry Morgan, County Administrator