

Employee Benefits Division Policy Memorandum

Number: Policy Memo 138r2
Date Issued: February 22, 2024
Subject: Student Eligibility for Dependent Children Receiving a Military Extension

PURPOSE:

Summarize the New York State Health Insurance Program's (NYSHIP) full-time student status requirements as they relate to dependents receiving a military extension.

BACKGROUND:

This memo summarizes NYSHIP's current policy regarding student eligibility for dependent children. It supersedes all past policy memos regarding student eligibility.

As a provision of the Patient Protection and Affordable Care Act (PPACA), dependent children are eligible to remain on health insurance coverage up to the age of 26, regardless of student or marital status. Effective January 1, 2024, NYSHIP administratively extended the eligibility provisions for health insurance to the dental and vision programs. Effective January 1, 2024 dependent children under age 26 are not required to be full-time students to be covered under a NYSHIP enrollee's dental and/or vision coverage.

As a result, the requirements outlined in this memo only apply to dependent students aged 26 and older receiving a military extension.

POLICY:

Establishing Eligibility

Dependent children who served in the military prior to age 26 may have their eligibility under NYSHIP extended for a period of time equivalent to their military service, up to four years, if they are a full-time student at an accredited secondary or preparatory school, college, or other educational institution. The school's characterization of "full-time" status is an acceptable measure of whether the student attends full-time. Additionally, the student must provide written documentation from the U.S. Military showing their dates of service. The student dependent cannot be eligible for other employer group coverage.

Student status is established when written documentation from an accredited secondary or preparatory school, college, or other educational institution where the child is attending as a student is provided, such as a letter from the school's registrar or an official transcript documenting full-time student status. When applying for dependent student coverage for a dependent child who is not currently a student, coverage will begin on the first day of the month in which attendance in class begins.

When Coverage Ends for a Full Time Student

A dependent continues to be eligible until the first of the following dates: the end of the month following the third month in which they complete course requirements for graduation, the end of the third month after they complete a semester as a full-time student or the end of the month in which the dependent reaches the adjusted age of 26.

When Coverage Ends for Students with Less than Full Time Status / Reduced Course Load:

- If a dependent child who is enrolled as a full-time student voluntarily drops a course(s) and becomes a part-time student or withdraws from school, coverage will end on the last day of the month in which the dependent child was considered a full-time student.
- If a dependent child becomes a part-time student because the school cancels a course, and the dependent child cannot register in another course to continue full-time status, NYSHIP coverage as a dependent student will continue through that semester as if the dependent child is a full-time student. Adequate proof from the school must be provided as well.
- A dependent child who needs less than a full-time course load for a semester to satisfy requirements for graduation at the end of that semester may be eligible for NYSHIP coverage if they meet the following criteria:
 - The dependent child must have been a full-time student in the term immediately preceding the semester in which course requirements will be completed; and
 - The enrollee or dependent child must provide a statement from the school or college administrator which verifies that during the semester the student is satisfying requirements for graduation.
- A dependent child may be granted a second semester of coverage during part-time attendance if there are circumstances which, through no fault of the student, prevent that student's timely graduation. Requests for this continued coverage must be submitted in writing to the Employee Benefits Division.
- A partially disabled dependent student taking a reduced course load may be eligible for health coverage. The enrollee or dependent child must provide the Employee Benefits Division with adequate medical documentation to substantiate that the reduced course load is the maximum course load of which the student is capable because of the disability.
- Combining a student's part-time status at multiple schools does not qualify the dependent as having full-time status unless one of the institutions advises in writing that it will accept all credits for the purpose of satisfying a degree program and indicates that the institution deems the dependent student to have full-time status during that term.

Qualified Schools:

For the purpose of establishing dependent student eligibility, NYSHIP recognizes attendance at any high school, college, or other school which is accredited by the State or which issues a certificate or diploma upon completion of the course of study. This includes trade schools that are accredited by the State or by a professional or trade organization, or by a reputable

organization inside or outside New York State. As an example, a full-time BOCES course of study leading to a certificate of completion in carpentry is acceptable. Full-time attendance at a trade school at which a student pays tuition in preparation for a specific occupation is acceptable. However, apprenticeship programs that establish an employer/employee relationship do not qualify the dependent as having full-time student status.

An excellent resource for verifying a school's accreditation status is the Council of Higher Education Accreditation (CHEA) website at <https://www.chea.org>

If there is any doubt surrounding the validity of a program, the situation should be submitted to the Employee Benefits Division for review.