



The Pocket Guide to COBRA Subsidy Notices

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	Who Gets This Notice?	Deadline to Furnish This Notice/Other Comments
COBRA Continuation Coverage Notice in Connection with Extended Election Periods	<p><u>Qualifying Event Before April 1, 2021</u></p> <p>Any “Assistance Eligible Individual” (AEI), defined as a qualified beneficiary who had a COBRA qualifying event before April 1, 2021, because of a covered employee’s reduction in hours or involuntary termination of employment <u>and</u> whose maximum period of COBRA coverage has not expired by April 1, 2021. This group includes the above-described AEIs who:</p> <ul style="list-style-type: none"> • Had enrolled in COBRA as of April 1, 2021 • Had enrolled in COBRA and discontinued coverage before April 1, 2021 • Had not elected COBRA as of April 1, 2021 <p>An AEI who is eligible to elect COBRA pursuant to this extended election period may elect COBRA coverage beginning April 1, 2021. This notice does not have to be provided to qualified beneficiaries who lost coverage due to other qualifying events.</p>	<p>May 31, 2021</p> <p>If employers/administrators are unable to identify those who are or could be AEIs due to involuntary termination of employment, the notice can be sent to all “potential” AEIs (i.e., anyone who terminated employment and anyone who had hours reduced) so they can take advantage of the extended election period if they qualify as an AEI. This may be the safest course if the plan administrator does not have visibility into the circumstances of the employee’s termination.</p>
ARP General Notice and COBRA Continuation Coverage Election Notice	<p><u>Qualifying Event From April 1, 2021 through September 30, 2021</u></p> <p>Any qualified beneficiary who has a COBRA qualifying event during the period from April 1, 2021 to September 30, 2021—regardless of whether the qualified beneficiary is or could be an AEI.</p>	<p>Follow normal timing rules for providing COBRA notices.</p>
Form For Switching COBRA Continuation Coverage Benefit Options	<p>Only provide if the plan sponsor decides to allow AEIs to elect to enroll in coverage that is different than the coverage in which the individual was enrolled at the time of the qualifying event, as permitted by ARP. If so, this form is sent along with all COBRA notices otherwise provided.</p>	<p>If applicable, send with notices described in the first two rows by the deadline.</p>

<p>Summary of the COBRA Premium Assistance Provisions under the American Rescue Plan Act of 2021</p>	<p>Qualified beneficiaries described in the first two rows. This summary notice includes the form for individuals to use to claim status as an AEI, and the form for notifying the plan of subsequent ineligibility for the subsidy due to eligibility for other group health plan coverage or Medicare.</p>	<p>Send with notices described in the first two rows by the deadline.</p>
<p>Notice of Expiration of Period of Premium Assistance</p>	<p>AEIs who will lose eligibility for COBRA premium assistance on account of the end of their maximum period of COBRA coverage, or the end of the COBRA premium assistance period (September 30, 2021).</p>	<p>At least 15 days, but not more than 45 days, in advance of the expiration of the AEI’s COBRA premium assistance.</p> <p>The plan administrator is required to send the expiration notice to individuals who have requested treatment as an AEI by submitting the applicable form “Request for Treatment as Assistance Eligible Individual.” Some plans may also send this notice to all AEIs, regardless of whether the AEI has submitted the form requesting treatment as an AEI.</p>