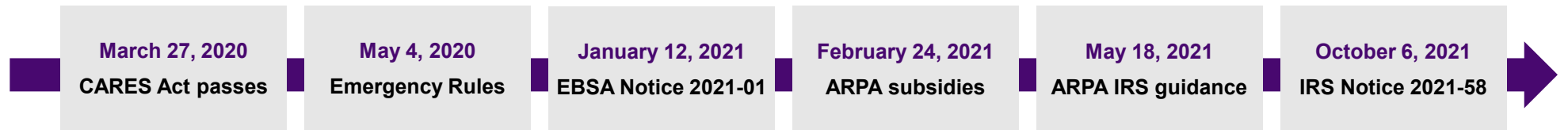


COBRA and COVID-19 relief

Pandemic response

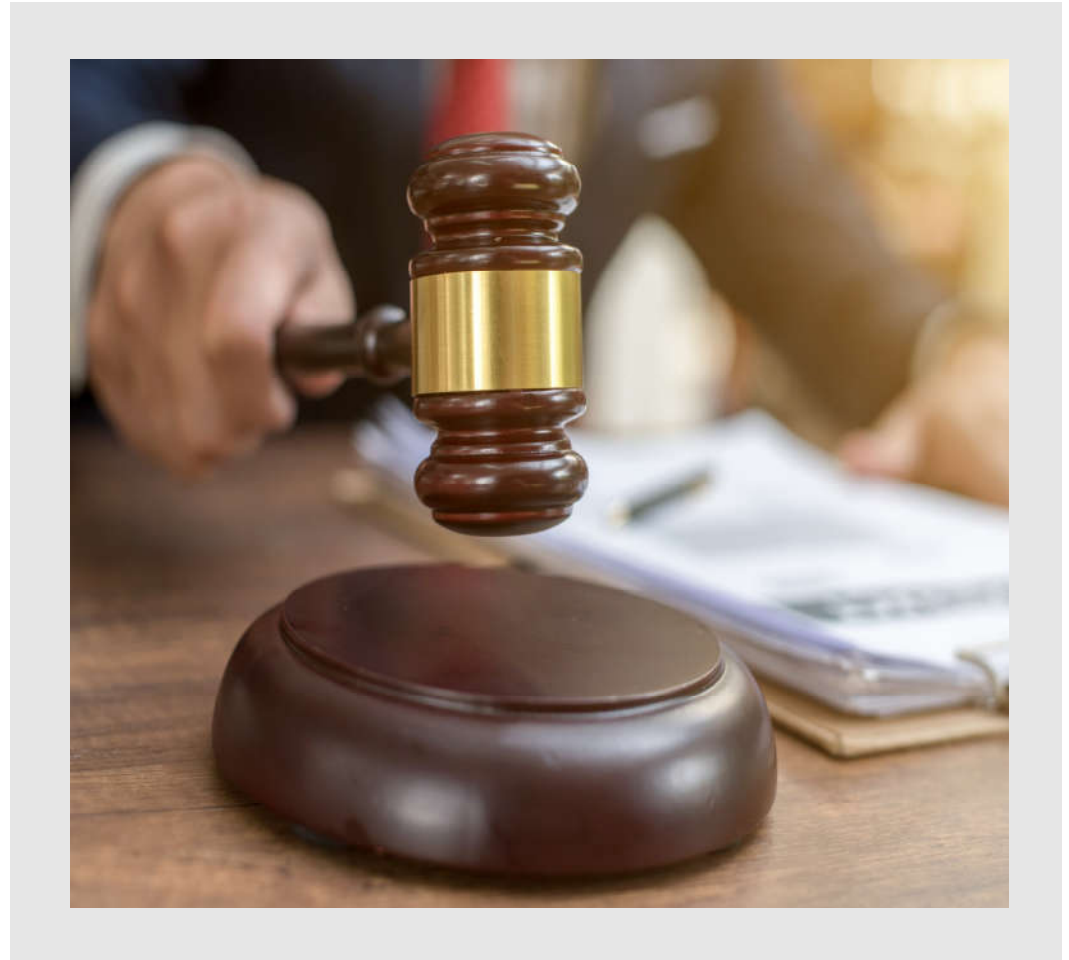


| 2020 | 2021 | 2022 |
|---|--|--|
| <ul style="list-style-type: none">COVID-19 deadline extensions are put in place as a result of CARES Act and resulting emergency rules. | <ul style="list-style-type: none">American Rescue Plan Act (ARPA) includes COBRA subsidies for qualifying participants who experienced an involuntary termination or reduction-in-hoursEBSA and IRS issue guidance that clarified that COBRA deadline extensions are to be applied on an individualized one-year basis. | <ul style="list-style-type: none">Both the Public Health and Presidential National Emergency continue. |

Overview

COVID-19 deadline extensions

- Deadline extensions are tied to presidential national emergency (PNE)
- The disregarded period includes the 60 days after the PNE is lifted
- The original deadlines start running at the end of the Outbreak Period



Which deadlines are extended?

- HIPAA special enrollment events
- Adding coverage, not dropping
- COBRA deadlines
- Claims and appeals deadlines

These deadlines are extended until 60 days after the earlier of (1) one year from the original deadline or (2) the end of the national emergency.

HIPAA SEPs

Marriage, birth, adoption

Loss of other group health plan coverage

Gain state premium subsidy

Lose Medicaid or SCHIP coverage

COBRA deadlines

Reporting a divorce or loss of dependent status qualifying event (first or second)

COBRA election

Initial COBRA premium payment

Ongoing monthly premium payments

Request for disability extension

Deadline extensions are tied to presidential national emergency

Public health emergency

- Determined by HHS
- Must be renewed every 90 days
- Last renewed October 13, 2022; expires January 11, 2023

The public health emergency does not impact the COVID-19 deadline extensions, but it is a good indicator of the state of the pandemic.

Presidential national emergency (PNE)

- Declared by the president
- Must be renewed every year
- Current national emergency expires February 28, 2023

The COVID-19 extensions are tied to the PNE.