

ARPA COBRA Subsidy - Update from ABG 4/22/2021 - AEI Subsidy Tools

This email provides instructions and resources on using the AEI Subsidy Tools available from ABG to support ARPA Administration. As detailed in previous communications, a \$15/QB fee applies.

There is no fee for running the AEI 2021 Report; however, by using the AEI Status functionality (updating a Members AEI status as explained in this email) you are agreeing to this fee and will be billed for any applicable notifications. If you do not wish to have ABG handle the ARPA Administration on your behalf, please let us know. A Waiver Form will soon be available to sign.

KEY TAKAWAYS:

- **AEI statuses need to be updated in the Portal by 5/7/2021 to ensure notifications are sent by 5/31/2021**
- **Access training videos and guides for updating statuses here:**
<https://www.amben.com/system-training.html>

What do we need to do?

- All employers using ABG for ARPA Subsidy Administration will need to identify Assistance Eligible Individuals in the WEX Portal. AEIs can be updated in two ways:
 - By using the AEI 2021 Report and Import tool
 - By manually updating the AEI 2021 Status in each Member's record

When do the updates need to be made by?

- **In order to ensure the letters are mailed by May 31, 2021, our vendor is requiring that the updates be made by May 7, 2021.**
- We understand that this timeline is short but it has been established so that required notices can be generated and mailed by the deadlines outlined in ARPA.

How do we update the AEI status using the AEI 2021 Report?

- **To assist with using the AEI 2021 Report and tool we have provided the following resources:**
 - [TRAINING VIDEO](#)
 - [AEI TOOL STEP-BY-STEP GUIDE \(WITH SCREENSHOTS\)](#)
 - [AEI TOOL STEP-BY-STEP GUIDE \(WITHOUT SCREENSHOTS\)](#)
 - [AEI TOOL ERROR LEGEND](#)
- **The overall process will be to:**
 - Run the AEI 2021 Report in the COBRA Portal
 - Update the 'AEI 2021' Status field to 'Eligible' 'Ineligible' or leave as unknown
 - Save the Report as a CSV
 - Upload the report back into the Portal using the AEI 2021 Import under Imports and Reports.
- **Due to the high volume of ARPA related requests, ABG will not be able to accommodate requests for individual client trainings. Please refer to the above guides, and contact our team if you need assistance.**

How do we update the AEI status manually in the Portal?

- **To assist with updating the AEI 2021 Status in the Portal use the following guides:**

- [MANUAL ENTRY STEP-BY-STEP GUIDE \(WITH SCREENSHOTS\)](#)
- [MANUAL ENTRY STEP BY STEP GUIDE \(WITHOUT SCREENSHOTS\)](#)
- **The overall process will be to:**
 - Look up the participant
 - On the profile tab, scroll down to the AEI 2021 Status and select Edit
 - Enter the new AEI 2021 Status & Save

We are a new client and some of our AEIs are not yet in our system, what do we do?

- You must still follow the process above to identify the AEI status for participants already loaded into our system.
- You must **also** complete and return the [ARPA Member Gathering Form](#) with the information for participants not yet in our system that need to be offered the ARPA Subsidy. This form must be completed and returned by **MAY 5, 2021**, to ensure we can get them loaded into the system and updated in time for Notices to be mailed by May 31, 2021.

What is an Assistance Eligible Individual?

- **Anyone** who was eligible for COBRA due to an involuntary termination or reduction in hours (voluntary or involuntary) and is still within their maximum continuation period (even if they are not currently enrolled or never enrolled).
 - Reduction in hours includes change in a business's hours of operations, a change from full-time to part-time status, taking of a temporary leave of absence, or an individual's participation in a lawful labor strike, as long as the individual remains an employee at the time that hours are reduced)
 - Involuntary Termination has yet to be defined by the IRS for the purposes of ARPA. If an employer is unsure whether the termination would be considered involuntary for the purposes of the ARPA COBRA subsidy, we recommend consulting with legal counsel until additional guidance is received. (Some employers have opted to review the guidance received regarding involuntary terminations during the ARRA COBRA Subsidy of 2009 – but it is important to note that no similar guidance has yet been issued for ARPA and may differ.)
- **This includes anyone who:**
 - Would be within their maximum continuation period had they made a timely COBRA election (even if they never enrolled)
 - Is currently active or eligible for COBRA
 - Was previously enrolled but has since cancelled (for non-payment or voluntarily)

Will ABG be sending the required notices?

- Yes. By using the AEI functionality described here, you are enabling the system to send the required notifications once they become available. As mentioned, a \$15/QB fee applies. **The AEI Status must be updated by May 7, 2021 in order to ensure the Notices are sent by May 31, 2021.**

We would like to require QBs to complete an attestation before enabling the subsidy, how can we do that?

- Download and Review the [Sample Attestation Form](#). At this time no customizations to this Form can be made, but we will communicate if that option becomes available.

- Please complete the [ABG ARPA Attestation Request Form](#) in order to opt in to this additional functionality. This form will be available by Monday April 26, 2021, and should be returned to cobrasupport@amben.com no later than May 5, 2021.
- Please note an additional \$3.75/QB fee applies if requiring attestation.

WHAT'S NEXT?

- By manually updating the AEI 2021 Status in each Member's record
- We expect the IRS may release additional guidance in the coming weeks and will share that information as it becomes available.
- Employers should focus heavily on updating AEIs in the system and providing information to ABG on QBs not yet in our system by the stated deadlines. These will be highlighted again in next week's communications.

Be well,

American Benefits Group | cobrasupport@amben.com | Tel: 800-499-3539 (Option 3)



This information has been provided as an informational resource for ABG clients and business partners. It is intended to provide general guidance, and is not intended to address specific risk scenarios. Regarding insurance coverage questions, each specific policy must be reviewed in its entirety to determine the extent, if any, of coverage available for the impact of the Coronavirus.