

# IMPORTANT INFORMATION ABOUT YOUR COVERAGE DURING THE COVID-19 EMERGENCY

On May 4, 2020, the Internal Revenue Service (“IRS”) and Employee Benefits Security Administration (“EBSA”) issued a final ruling regarding the extension of certain timeframes during the COVID-19 Emergency. Your continuation coverage through the Consolidated Omnibus Reconciliation Act (COBRA) may be impacted by these extensions.

To read the ruling in full, please visit: <https://www.federalregister.gov/d/04-11796>

To read an FAQ for participants and beneficiaries, please visit: <https://www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/faqs/covid-19.pdf>

## WHAT THIS MEANS FOR YOU

- Under the above ruling, the following timeframes are disregarded for the period starting March 1, 2020 through 60 days following the end of the National Emergency Declaration (“Outbreak Period”) or until further rulings and guidance are issued
  - 60-day election window
  - Date for making COBRA premium payments
    - 45-day initial grace period
    - 30-day subsequent grace period
  - Date for notifying the plan of qualifying events
  - Date for notifying the plan of a disability determination
  - 30-day period to request special enrollment (or 60-days if applicable)

### Do I still have to make my COBRA Election to continue coverage?

**Yes.** You must elect coverage within the extended election window. It is also important to note you must make your first month’s premium payment in order to be reinstated.

### Do I still have to make my payments once enrolled?

**Yes.** Although the ruling allows payments to be deferred until the “Outbreak Period” ends, all payments will eventually need to be brought up to date. Failure to do so may result in termination of coverage.

### What happens if I do not pay within the usual grace period?

Coverage may be terminated; however, late payments will be accepted during the outbreak period as described above.

\*The information included in this notices is for informational purposes only. Please refer to the Final Ruling for the complete scope of this Announcement. <https://www.federalregister.gov/d/04-11796>

American Benefits Group does not provide legal or tax advice. Compliance, regulatory and related content is for general informational purposes and is not guaranteed to be accurate or complete. You should consult an attorney or tax professional regarding the application or potential implications of laws, regulations or policies to your specific circumstances.