



FREQUENTLY ASKED QUESTIONS

COBRA Subsidies

WHAT IS ARPA?

The American Rescue Plan Act of 2021 (abbreviated ARPA or ARP) was enacted on March 11, 2021 by President Biden, to temporarily subsidize full COBRA premiums for COBRA Qualified Beneficiaries who are eligible for treatment as Assistance Eligible Individuals (AEI).

WHO IS ELIGIBLE?

An **Assistance Eligible Individual** is defined as a **COBRA Qualified Beneficiary** who meets all of the following requirements:

- (1) **MUST** have a COBRA qualifying event that is a reduction in hours or an involuntary termination of the covered employee's employment;
- (2) **MUST** elect or be enrolled in COBRA continuation coverage;
- (3) **MUST NOT** be eligible for Medicare; AND
- (4) **MUST NOT** be eligible for coverage under any other group health plan, such as a plan sponsored by a new employer or a spouse's employer.*

If you have **COBRA eligible dependents** who did not elect COBRA continuation coverage at the time it was first offered or who have since dropped this continuation coverage, these COBRA eligible dependents may now have the right to treatment as an Assistance Eligible Individual and may elect continuation under the second election offered under the ARPA.

WHEN WILL THE SUBSIDY OCCUR?

The COBRA subsidy is available from April 1, 2021 through September 30, 2021. If you continue your COBRA continuation beyond September 30, 2021, you will have to pay the full amount due for October's premium and beyond.

WHY IS THIS HAPPENING?

To provide relief to Americans affected by the pandemic.

HOW DO I RECEIVE THE SUBSIDY?

Attestation: Assistance Eligible Individuals are required to formally certify that they meet the criteria to receive premium assistance. Please complete the AEI Attestation insert provided in



your letter. Completion of the AEI Attestation will apply the AEI premium assistance and adjust your COBRA premium.

→**If second Election:** Individuals who may have experienced a reduction in hours or an involuntary termination of employment and did not elect COBRA when it was first offered OR who did elect COBRA but are no longer enrolled, have a new election opportunity and are eligible for the premium assistance. If your employer has identified you as having experienced a reduction in hours or an involuntary termination of employment, you will see an AEI 2021 2nd COBRA CONTINUATION COVERAGE ELECTION FORM included in this letter.

→**If currently enrolled in COBRA:** If already enrolled and you would like to request treatment as an Assistance Eligible Individual, please complete the AEI Attestation insert provided in your letter. Completion of the AEI Attestation will apply the AEI premium assistance and adjust your COBRA premium.

WHAT ARE THE DEADLINES?

If this is your second election opportunity, you have 60 days from the date of the notice to elect COBRA coverage with the subsidies effective April 1st.

If you are currently enrolled, your subsidy will be applied once BRI receives the AEI Attestation form included in your paperwork.

If your qualifying event date falls within the subsidy period of April 1 – September 30, you have 60 days from the date of the Specific Rights Notice/General ARPA Notice.

WHAT FORM(S) DO I NEED TO COMPLETE?

If this is your second election opportunity:

- AEI 2021 2nd COBRA CONTINUATION COVERAGE ELECTION FORM
- AEI Attestation

If you are currently enrolled:

- AEI Attestation

If your qualifying event date falls within the subsidy period of April 1 – September 30: - Specific Rights Notice/General ARPA Notice.

- Election Form
- AEI Attestation



WHERE DO I RETURN MY FORMS?

Benefit Resource, LLC

PO Box 642

Willow Grove, PA 19090

WHAT IF I DID NOT RECEIVE A SECOND ELECTION NOTICE?

Individuals that will receive retroactive notifications were identified by their employer based on the qualification criteria. All retroactive letters will be mailed by May 31st. It will take some time to receive this notification through US Mail. If you have not received a notification and believe you are an AEI, you have the ability to complete a request for treatment as an AEI form (<https://www.dol.gov>) and submit a form to your employer for review.

WHAT IF I RECEIVED A DENIAL NOTICE?

You may wish to visit the U.S. Department of Labor (DOL) web site at <https://www.dol.gov/cobra-subsidy> for more information. If you believe you should be eligible for treatment as an AEI but your letter indicates otherwise. Your first step is to contact your former employer. Beyond that, contact the DOL's Employee Benefits Security Administration in Washington, D.C. at askebsa.dol.gov or at (866) 444-3272. If you work for a state or local government employer and have questions regarding the premium assistance, please contact the Centers for Medicare & Medicaid Services via email at phig@cms.hhs.gov or call (410) 786-1565. For more information regarding ARPA premium assistance and eligibility questions, visit <https://www.dol.gov/cobra-subsidy> or contact the DOL at askebsa.dol.gov or at (866) 444-EBSA (3272).

WHAT IF I NEED SERVICES BEFORE MY AEI PAPERWORK IS PROCESSED?

There may be a significant amount of time for COBRA administrators to receive AEI paperwork, update systems and notify each applicable insurance carrier of the ARPA reinstatement(s). From there, the insurance carriers will need to process each enrollment in their systems as well. If you are in need of services, please be sure to visit your insurance carrier's website for a claim form to complete in the interim. Once COBRA is reinstated, you will be reimbursed by the insurance carrier based on your plan(s).

HOW DO I GET A REFUND?

If it has been determined that you are an Assistance Eligible Individual (AEI) and you have paid for months of coverage that should have been subsidized the system will apply a credit to future months of coverage, once the subsidy has been entered.



If your COBRA maximum coverage period ends at any point prior to the end of the subsidy period (September 30th) BRI will issue you a refund.

WHAT PLAN AM I ENROLLED IN?

The ARPA regulations directed plan sponsors to offer the original plans to be effective 4/1/2021. If your plan option(s) no longer exists, you will be/have been placed into the most comparable plan available at this time. The premium cannot be greater than what was originally offered. For more information on your plan, please call your insurance provider directly.

CAN I CHANGE PLANS AT THIS TIME?

If the Plan sponsor holds an open enrollment period, you may change plans at that time along with active employees. If your plan sponsor allowed for other plans to be selected, that information would be included in your ARPA paperwork.