

e-Alert

04.12.21

DOL Issues Model Notices and FAQs for ARPA COBRA Subsidy

Background

The U.S. Department of Labor (DOL) issued [FAQs](#) and [model notices](#) for the COBRA premium assistance provisions of the [American Rescue Plan Act](#) (ARPA) on April 7, 2021. The ARPA provides 100% subsidy for employer-sponsored group health insurance continued under COBRA along with similar state continuation of coverage programs for those who are eligible. The subsidy applies from April 1, 2021 through September 30, 2021. The FAQs and model notices can be found on the DOL website, dedicated to providing guidance on the ARPA COBRA Subsidy.

Summary

Model Notices

Plans may use the DOL model notices to meet their notice obligations under the COBRA subsidy provision of the ARPA. The new model notices released by the DOL are below:

- Model General Notice and COBRA Continuation Coverage Election Notice: [MS Word](#) | [PDF](#)

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- Model Notice in Connection with Extended Election Period: [MS Word](#) | [PDF](#)
- Model Alternative Notice: [MS Word](#) | [PDF](#)
- Model Notice of Expiration of Premium Assistance: [MS Word](#) | [PDF](#)
- Summary of COBRA Premium Assistance Provisions under the American Rescue Plan Act of 2021 (to be provided with the General Notice): [MS Word](#) | [PDF](#)

FAQs

The DOL has also released 21 FAQs on topics related to eligibility, application procedure, notice requirements and duration of the subsidy. The FAQs state that prior federal COVID-19-related relief for plan deadlines does not apply to notices or election periods set forth in the ARPA provisions about the COBRA subsidy. However, an individual may elect COBRA from an earlier qualifying event if the individual is eligible to make that election, including under the extended time frames provided by that relief.

Employer Next Steps

- If HRK will continue to monitor COVID-19-related laws.
- If you have questions regarding this e-Alert, please contact our [Benefits Team](#).

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