

Extension of Certain Timeframes for Employee Benefit Plans, Participants, and Beneficiaries Affected by the COVID-19 Outbreak

COBRA Elections

The COBRA continuation coverage provisions generally provide a qualified beneficiary a period of at least 60 days to elect COBRA continuation coverage under a group health plan. **The DOL National Emergency guidelines extend this election time. If the qualifying event occurs during the National Emergency (March 1, 2020 - TBD), the deadline has now been extended to 60 days after the end of the National Emergency (not yet announced).**

COBRA Premium Payments

Generally, plans are required to allow payment of premiums in monthly installments, and plans cannot require payment of premiums before 45 days after the day of the initial COBRA election. COBRA continuation coverage may be terminated for failure to pay premiums on time. Under the COBRA rules, a premium is considered timely if it is made no later than 30 days after the first day of the period for which payment is being made. **Under the National Emergency, the COBRA participant now has until 60 days after the end of the National Emergency to pay missed premiums and not be cancelled.**

Qualifying Event or Disability Determination

Notice requirements prescribe 60 days for employers to notify the plan of certain qualifying events and for individuals to notify the plan of certain qualifying events or a determination of disability. **Under the National Emergency, the COBRA participant now has until 60 days after the end of the National Emergency to notify the employer of the qualifying event or of the disability determination.**

Source: <https://www.govinfo.gov/content/pkg/FR-2020-05-04/pdf/2020-09399.pdf>

Questions?

For questions regarding COBRA Elections or Qualifying Events/Disability Determination, please contact Rachel Wilson at rachel.wilson@iowa.gov or 515-281-8866.

For questions regarding COBRA Premium Payments, please contact Wellmark customer service at 800-622-0043 or Delta Dental Customer Service at 800-544-0718.