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ARPA COBRA Premium Assistance Expiration: A Friendly Reminder for Employers

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Who Needs to Know

Employers.

Why It Matters

A COBRA subsidy has been offered through September 30. Employers must provide notice to participants that the subsidy is ending no later than September 15, 2021.

All good things must come to an end and the American Rescue Plan Act (ARPA) COBRA premium assistance is no exception. September 30 marks the end of the ARPA COBRA premium subsidy provisions, which required employers and insurers to provide “assistance eligible individuals” (AEIs) with a 100% subsidy for premiums otherwise owed for COBRA coverage. However, nothing comes without a cost, and health plans have until **September 15** to notify AEIs that the premium assistance will end. If you haven’t done so already, we suggest that you confirm that this notice is or has been timely provided.

The U.S. Department of Labor has issued a model notice of expiration of premium assistance that can be used to satisfy this requirement. The model is also available in Spanish.

Please contact a member of our Employee Benefits Practice with questions.

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