

Extension of Certain Benefits Timeframes Due to National COVID-19 Emergency

Event	Current Time Frame	New Time Frame	Note
COBRA Enrollment	60 days from the date on the notice to the former member	Extended through the full period of the National Emergency plus an additional 60 days. <i>At this time, we do not know the ending date of the National Emergency.</i>	<ul style="list-style-type: none"> • Much extra time to elect, but participant must pay retroactively to have the coverage.
Premium Due Date COBRA and LWOP	30 days	See above.	<ul style="list-style-type: none"> • COBRA coverage still cannot start without payment and anyone who has been terminated for non-payment of premium during the emergency period must be reinstated and given the appropriate time frame to make payment. • Current COBRA payment cannot be required before 45 days after the day of the initial COBRA election. • Currently, we are not terminating LWOP or COBRA for non-payment of premium. • After the emergency plus 60 days expires, we will give a reasonable time to collect the premium.
Claim Filing	Varies based on plan, i.e., medical, dental, vision	See above.	<ul style="list-style-type: none"> • One year for medical and dental • 90 days for vision • Vendors will manage this extension accordingly
Run-out for 2019 FSA and Dependent Care	April 30, 2020	See above.	<ul style="list-style-type: none"> • The notice does not specifically note that Flexible Spending accounts and Dependent Care accounts are eligible for this extension. • However, our prior FSA administrator, ASI, is extending this deadline to coincide with the notice.
HIPAA Special Enrollment	31 days from date of event	See above.	<ul style="list-style-type: none"> • Documentation still required. Event must have taken place during the emergency. • Applies to marriage, birth, adoption, loss of other coverage, or CHIP/Medicaid
Qualified Life Event	31 days from date of event	See above.	<ul style="list-style-type: none"> • Documentation still required, event must have taken place during the emergency. • Applies to marriage, birth, adoption, loss of other coverage, or CHIP/Medicaid
Appeals for Claims	State deadline is 180 days after appeal #1, 60 days for appeal #2, 60 days for appeal #3	See above.	<ul style="list-style-type: none"> • Regarding the denial of a claim and the member wants to submit an appeal.
External Reviews for Claims	4 Months	See above.	<ul style="list-style-type: none"> • This is the #3 appeal for claims as shown above. • Our current rules allow for an extensive amount of time to appeal but will comply with guidance.

Questions? Contact benefitsissues@azdoa.gov.

5/12/2020