<table>
<thead>
<tr>
<th>Event</th>
<th>Current Time Frame</th>
<th>New Time Frame</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>COBRA Enrollment</td>
<td>60 days from the date on the notice to the former member</td>
<td>Extended through the full period of the National Emergency plus an additional 60 days. At this time, we do not know the ending date of the National Emergency.</td>
<td>• Much extra time to elect, but participant must pay retroactively to have the coverage.</td>
</tr>
<tr>
<td>Premium Due Date</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| COBRA and LWOP                 | 30 days                                          | See above.                                                                    | • 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.                                                                    | • 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.                                                                    | • 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.                                                                    | • 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.                                                                    | • 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.                                                                    | • Regarding the denial of a claim and the member wants to submit an appeal.                                                                                                                           |
| External Reviews for Claims   | 4 Months                                         | See above.                                                                    | • 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