

Due to the COVID-19 National Emergency, timelines used by group health plans for continuation coverage (COBRA) will disregard the period from March 1, 2020 until sixty (60) days after the end of the COVID-19 National Emergency (the “Outbreak Period”). This is being done based on a final rule issued by the federal health care agencies.

The final rule affects the timeline for:

1. a covered employee, beneficiary or employer to give notice to a Plan that a qualifying event has happened;
2. a covered employee to elect continuation coverage under COBRA; and
3. a covered employee to make the required monthly premium payments

Notice of Qualifying Event to Employer or Plan

Currently, a covered employee must be allowed at least 60 days to give notice to a Plan that a qualifying event has happened. Employers have 30 days to give notice of a qualifying event to the Plan.

- *During the Outbreak Period:* Under the final rule, the timeframe for the employee to give notice to the Plan has been extended to at least 60 days after the end of the outbreak period. The timeframe for the employer to give notice to the plan has been extended to 30 days after the end of the outbreak period.

Election Period

Currently, a qualified beneficiary has 60 days to elect COBRA continuation coverage.

- *During the Outbreak Period:* Under the final rule, the election period is extended to 60 days after the end of the Outbreak Period or other announced date.
- There will be no lapse in coverage. The COBRA coverage period will begin retroactively on the day after your active coverage has ended.

Premium Payments

Currently, your **first premium payment is due** within 45 days of submitting your enrollment form. Coverage will not begin until your first monthly payment is received. Your **monthly premium payments** are due within 30 days of the due date on the statement. *You are still required to make your monthly payments each month during the Outbreak Period.*

- *During the Outbreak Period:* Due to the National Emergency, you are granted a 60-day extension for your first payment and monthly premium payments.

Reinstatement/Terminations of Coverage

Covered employees whose coverage was terminated for not making March payments are being reinstated; anyone termed in March 2020 for not making February 2020 payments are not being reinstated.

- COBRA terminations for non-payment have been suspended until the end of the Outbreak Period or other such date announced by federal health care agencies.
- We are activating or reinstating coverage for enrolled participants paid through February, or who elect coverage on or after March 1, 2020. Coverage for enrolled COBRA participants will remain active through the end of the National Emergency's Outbreak Period.
- Participant mailings for qualifying event notice and monthly billing statements will be updated to include language advising members of the timeline changes.

Keep your Plan informed of address changes

To protect your family's rights, let the Benefit Services Division know about any changes in the addresses of family members. You should also keep a copy, for your records, of any notices you send to the Benefit Services Division.

Plan contact information

Arizona Department of Administration
Benefit Services Division
100 N. 15th Ave., Suite 260
Phoenix, AZ 85007
Phone: 602-542-5008 or 800-304-3687
Fax: 602-542-4744
Email: BenefitsIssues@azdoa.gov
Website: benefitoptions.az.gov/cobra