

Updated Member Benefits Due to COVID-19 National Emergency

Benefit	Explanation	Example
Special Enrollment Period	<p>Deadline to enroll in another GHP extended - disregard the [SEP]period from 3/1/2020 until 60 days after the announced end of the National Emergency or such other date announced by the Agencies in a future notice (called Outbreak Period)</p> <p><a href="https://www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/faqs/covid-19.pdf">https://www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/faqs/covid-19.pdf</a></p> <p><a href="https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected">https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected</a></p>	<p>If qualifying event, individual can enroll in another group health plan 30 days after the end of the Outbreak period</p> <p>Qualifying event: job loss on 4/30/2020 SEP: up to 30 days after the end of the Outbreak Period</p>
SEP in Individual Marketplace	No changes	
COBRA election	<p>Disregard the [election and date for providing COBRA election notice] period from 3/1/2020 until 60 days after the announced end of the National Emergency or such other date announced by the Agencies in a future notice (called Outbreak Period)</p> <p><a href="https://www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/faqs/covid-19.pdf">https://www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/faqs/covid-19.pdf</a></p> <p><a href="https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected">https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected</a></p>	<p>Qualifying event: 4/30/2020 May elect COBRA up to 60 days after the end of the Outbreak Period</p> <p>Qualifying event: 2/15/2020 May elect COBRA up to 46 days after the end of the Outbreak Period (60 days – 14 days prior to 3/1/2020)</p>
COBRA premiums	<p>Disregard the [date for making COBRA premium payments] period from 3/1/2020 until 60 days after the announced end of the National Emergency or such other date announced by the Agencies in a future notice (called Outbreak Period)</p> <p><a href="https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected">https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected</a></p>	<p>COBRA elected 4/1/2020, up to 45 days after the end of the Outbreak Period to make premium payment (45 days if initial premium payment and 30 days if in grace period)</p> <p>No benefits paid until election made and premiums paid</p>
Date for new benefit claim (submission of claim)	<p>Disregard the period [date within which individuals may file a benefit claim under the plan's claims] from 3/1/2020 until 60 days after the announced end of the National Emergency or such other date announced by the Agencies in a future notice (called Outbreak Period)</p> <p><a href="https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected">https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected</a></p>	<p>Service date: 4/1/2020 Claim due date: 365 days after the service date after the end of the Outbreak Period</p> <p>Service date: 1/1/2020 Claim due date: 305 days after the end of the Outbreak period (365-60 days that have elapsed = 305 days)</p>
Appeal	<p>Disregard the period [date within which claimants may file an appeal of an adverse benefit determination] from 3/1/2020 until 60 days after the announced end of the National Emergency or such other date announced by the Agencies in a future notice (called Outbreak Period)</p> <p><a href="https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected">https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected</a></p>	<p>First level: Up to 180 days after the end of the Outbreak Period</p> <p>Claim denial made 10/1/2020 160 days passed up to 3/1/2020 leaving 20 days left. Appeal can be filed up to 20 days after the end of the Outbreak Period.</p> <p>Claim denial made 3/15/2020. Appeal can be filed up to 180</p>

		days after the end of the Outbreak period
External review	<p>Disregard the period [date within which claimants may file a request for an external review after receipt of an adverse benefit determination or final internal adverse benefit determination] from 3/1/2020 until 60 days after the announced end of the National Emergency or such other date announced by the Agencies in a future notice (called Outbreak Period)</p> <p><a href="https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected">https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected</a></p>	<p>Second level: Up to 120 days after the end of the Outbreak period</p> <p>First level appeal determination made 12/15/2019 75 days passed up to 3/1/2020 leaving 45 days left. Appeal can be filed up to 45 days after the end of the Outbreak Period.</p> <p>First level appeal determination made 4/15/2020. Appeal can be filed up to 120 days after the end of the Outbreak period</p>
Perfect external review	<p>Disregard the period [date within which a claimant may file information to perfect a request for external review upon finding the request was not complete] from 3/1/2020 until 60 days after the announced end of the National Emergency or such other date announced by the Agencies in a future notice (called Outbreak Period)</p> <p><a href="https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected">https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected</a></p>	<p>Up to 10 days after the end of the Outbreak period</p> <p>Request for additional information made 2/20/2020 – additional information may be filed up to 1 day after the end of the Outbreak Period.</p> <p>Request for additional information made 3/20/2020 – additional information may be filed up to 10 days after the end of the Outbreak Period.</p>