



## Federal Extension of Certain Time Frames Under Group Health Benefit Plans

Due to the coronavirus (COVID-19) pandemic, federal agencies have temporarily extended certain deadlines under group health benefit plans, including dental plans, disability and other plans subject to ERISA and the Internal Revenue Code, including HRAs and FSAs. The U.S. Department of Labor (DOL) and the IRS have issued a notification of relief that affects a number of deadlines, including those related to special enrollee elections, COBRA coverage, and filing claims and appeals.

The COVID-19 outbreak in the United States was declared a national emergency, beginning March 1, 2020. The relief notification extends certain time frames by mandating the period starting March 1 through 60 days after the national emergency is over (known as the “outbreak period”) to **not** be considered in applying certain deadlines. The date for the end of the national emergency has not yet been announced.<sup>1</sup> However, the extension cannot exceed one year.

We will administer plans consistent with these temporarily extended deadlines mandated by the federal government. The chart below identifies the deadlines that affect employer-sponsored, ERISA self-funded health benefit plans administered by Star Marketing and Administration, Inc.

Which Time Frames are Impacted by the Federal Extension?	What’s the Time Frame?	Extend the Time Frame by Disregarding the Outbreak Period, which is:
Time Frame for <b>Special Enrollee</b> to Elect Coverage <sup>2</sup>	30 days from the qualifying event (i.e. birth, marriage, adoption)	3/1/20 through 60 days after the announced end of the National Emergency
Time Frame for <b>Plan to Provide COBRA Election Notice</b> <sup>3</sup> to Employee/Dependent	14 days from the date the plan administrator is notified of a qualifying event.	3/1/20 through 60 days after the announced end of the National Emergency
Time Frame to <b>Elect COBRA</b> <sup>3</sup>	60 days from the later of: <ul style="list-style-type: none"> <li>a. the date the election notice is furnished; or</li> <li>b. the date coverage ends</li> </ul>	3/1/20 through 60 days after the announced end of the National Emergency
Time frame to <b>Remit Initial COBRA Premium</b> <sup>3</sup>	45 days from the COBRA election date	3/1/20 through 60 days after the announced end of the National Emergency
Time Frame to <b>Remit Subsequent COBRA Premium</b> <sup>3</sup>	Within the 30 day grace period after the first day of the coverage period	3/1/20 through 60 days after the announced end of the National Emergency

Time Frame to <b>Provide Notice of Qualifying Event</b>	60 days from qualifying event (i.e. divorce, loss of dependent child status, disability)	3/1/20 through 60 days after the announced end of the National Emergency
Time Frame to <b>Submit a Claim</b>	Deadline to file a claim under the plan (time frame may vary from plan to plan but is often 12 months)	3/1/20 through 60 days after the announced end of the National Emergency
Time Frame to <b>Submit a Request for Internal Appeal</b>	180 days from receipt of notice of adverse benefit determination	3/1/20 through 60 days after the announced end of the National Emergency
Time Frame to <b>Submit a Request for External Appeal</b> <sup>2</sup>	4 months from receipt of final adverse benefit determination	3/1/20 through 60 days after the announced end of the National Emergency
Time Frame to <b>Perfect a Request for External Appeal</b> <sup>2</sup>	The later of: a. The end of the 4-month period in which to request an external appeal; or b. 48 hours from receipt of notification that explains the request for external review is incomplete and describes the information or materials needed to make the request complete.	3/1/20 through 60 days after the announced end of the National Emergency

Review your plan document for plan-specific time frames.

Employees who are impacted by these changes and have questions can call Customer Service at 800.522.1246.

To learn more, visit [bit.ly/summary-time-frame-extension](https://bit.ly/summary-time-frame-extension).

**For more on benefit changes due to COVID-19, visit [trustmarkbenefits.com/Small-Business-Benefits/COVID-19](https://trustmarkbenefits.com/Small-Business-Benefits/COVID-19).**

<sup>1</sup>The date of the end of the national emergency could vary for different parts of the country, if public emergencies end at different times in different states or regions.

<sup>2</sup>Does not apply to limited scope dental or disability income plans.

<sup>3</sup>COBRA is applicable only for members/dependents of groups with 20 or more employees in the prior year. COBRA does not apply to disability income plans.

## Small Business Benefits

Self-funded plans are administered by Star Marketing & Administration, Inc., and stop-loss insurance and ancillary coverage are provided by Trustmark Life Insurance Company