Employee Benefit Extensions for the COVID-19 Pandemic

8 extended time frames under the “Extension Rule”

- HIPAA special enrollment period
- COBRA election period
- COBRA premium payment period
- COBRA notices from employees
- Benefit plan claim filing deadlines (Medical, FSA, etc.)
- Adverse Benefit Determination Appeal Deadline
- External Review Request Deadline
- Deadline to Submit Additional Information for External Review Request

March 1, 2020
National Emergency begins

Date: TBD
National Emergency ends

Date: TBD
Outbreak Period ends

+60 DAYS

Outbreak Period

Date: TBD
Standard Election/Filing Period
Will vary depending on normal deadlines for transaction type

3 types of plan changes allowed under “Notice 2020-29”

- Elect, change or cancel medical plan
- Elect, change or cancel Health FSA
- Elect, change or cancel DepCare FSA

June 1, 2020
COVID-19 Med/FSA PIE

Deadline: TBD
will take end date of National Emergency and Outbreak Period into consideration