



News & Types: Employment, Labor & Benefits Update

Masuda Funai Benefits Newsflash (Updated) - ARPA COBRA Subsidy - Final Notice: Deadline on September 15, 2021

9/10/2021

By: Jennifer R.M.C. Watson

Practices: Employment, Labor & Benefits

Assistance Eligible Individuals (“AEIs”) who elect COBRA continuation coverage do not pay any COBRA continuation premiums during the period April 1, 2021 through September 30, 2021 (the “Subsidy Period”). On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021 (“ARPA”) into law. Among other employee benefit provisions, ARPA provides a 100% federal COBRA subsidy for AEIs during the Subsidy Period.

September 15, 2021 is the final notice deadline for those AEIs whose COBRA subsidy benefits will end on September 30, 2021. Thus, HR and Benefit managers should review those AEIs whose ARPA COBRA subsidy will end on September 30, 2021 and ensure those AEIs receive Note of Expiration of Period of Premium Assistance by September 15, 2021. A model notice can be found on the Department of Labor’s website at Notice of Expiration of Period of Premium Assistance ([dol.gov](https://www.dol.gov)). HR and Benefit managers should work with their plan providers and counsel to complete the notice and ensure its delivery by September 15, 2021.