



Human Resources

P.O. Box 4113
Flagstaff, AZ 86011-4113
928-523-2223
928-523-7486 (fax)
HR.Contact@nau.edu

NAU Group Health Plans COBRA Deadline Extension Update:

On April 28th the U.S. Department of Labor, the Department of Treasury and the Internal Revenue Service jointly issued a rule extending numerous timeframes applicable to group health plans. The rule extends COBRA enrollments 60 days from the end of the National Emergency due to COVID-19. In addition, the deadline for COBRA premium payments has been extended 60 days from the end of the National Emergency. The COBRA coverage period remains the same with 18- 36 months depending on the qualified life event.

The purpose of the rule is to assist affected group health participants that may be having difficulty in meeting deadlines for COBRA enrollment, payment of COBRA premiums, COBRA qualifying event, coverage portability, and claims filing.

Effective date and length of deadline extension timeframe:

The final rule is effective immediately and means that any deadline that ended on or after March 1, 2020 (the start date of the National Emergency due to COVID-19 as declared by the President) would be extended through the full period of the National Emergency plus an additional 60 days. At this time, we do not know the end date of the National Emergency.

Once an end date for the National Emergency due to COVID-19 is determined, COBRA enrollments have the normal 60 days from the COBRA notice to enroll in COBRA, plus the additional 60 day extension after the end date of the National Emergency. Normally, COBRA premium payments are due first of the month and have a 30 days grace period or the coverage will terminate. With the new deadline extension COBRA monthly premiums are due 60 days after the defined date end date of the National Emergency.

For questions contact: NAU Benefits COBRA Administrator at (928)523-2223 or nauhrbenefits@nau.edu
PO Box 4113 Flagstaff, AZ 86011.

Examples for the above timeframes/deadlines:

For these examples, we are assuming that the National Emergency ends on May 15, 2020. A period of 60 days following that end date would be July 14, 2020.

COBRA election example:

An employee has terminated employment with benefit coverage terminating on April 20, 2020. Normally, the former employee would have 60 days from April 20th to elect COBRA coverage. With the deadline extension, the election period begins after the National Emergency end date plus a 60 day period (May 15, 2020 + 60 days = July 14, 2020). Therefore in this example the employee has until September 12, 2020 to elect COBRA coverage).

COBRA premium example:

Monthly premiums are due on the first of the month, and the COBRA participant has 30 days to submit COBRA premium payment. With the deadline extension, if the premium is not made on March 31, 2020 for March coverage, COBRA coverage WILL NOT terminate. The COBRA participant has from the National Emergency end date (in our example this is May 15th) plus the following 60 days, August 13, 2020 (the full 30 day grace period following July 14, 2020), in which to pay the premium for March as well as premiums for coverage for the months of April, May, June and July. The COBRA participant would need to pay the premium for August no later than August 31, 2020 (the normal 30 day grace period would apply since the National Emergency end date plus the additional 60 day period expired prior to August 1).

Additional Information:

- News Release: <https://www.dol.gov/newsroom/releases/ebsa/ebsa20200428>
- Notice on the Final Rule: https://www.dol.gov/sites/dolgov/files/ebsa/temporary_postings/covid-19-final-rule.pdf
- FAQs: <https://www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/faqs/covid-19.pdf>
- EBSA Disaster Relief Notice 2020-01: <https://www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/disaster-relief/ebsa-disaster-relief-notice-2020-01>