

PLEASE READ – IMPORTANT TIME-SENSITIVE INFORMATION ABOUT YOUR BENEFITS

This notice contains important information about benefit deadline extensions that may allow you additional time to enroll in benefits. Please read it carefully and contact Jason Reeves at JReeves36@ivytech.edu or your campus HR team for any questions.

IMPORTANT BENEFIT DEADLINE EXTENSIONS

Due to the COVID-19 public health emergency, the Department of Health and Human Services (HHS) has permitted employers to extend certain deadlines that may allow you or your eligible dependents extra time to enroll in the College's health plan, elect or pay for COBRA, and submit claims or appeals for health care benefits. The intent of the extension is to minimize the risk that individuals lose benefits because they do not comply with normal deadlines that may not be appropriate for this time of massive economic and employment disruption.

The extension provides that an "Outbreak Period" is ignored in determining the deadline for participants to elect special enrollment in a health plan, elect or pay for COBRA coverage or make or appeal a benefit plan claim. The Outbreak Period is the period from March 1, 2020, until 60 days after the announced end of the COVID-19 National Emergency. For example, if the end of the COVID-19 National Emergency were announced to be July 31, 2020, the Outbreak Period would end September 29, 2020.

Special Enrollment

A Special Enrollment event gives you the opportunity to enroll in the health plan mid-year. Examples of a Special Enrollment include loss of other coverage and the addition of a new dependent due to marriage, birth, or adoption. You normally have 31 days to enroll in health coverage after the Special Enrollment event. Under the extension, the calendar days falling within the Outbreak Period do not count in determining your 31 days.

If you have experienced a Special Enrollment Event on or after January 31, 2020, and you have not enrolled yourself and/or your eligible dependents in the College's health plan, you now have additional time to enroll.

If your Special Enrollment event is due to the loss of eligibility for Medicare or CHIP, or eligibility for premium assistance under Medicare or CHIP then the period is 60 days, not 30.

Please note that, except in the case of Special Enrollment Events related to births or adoptions, your coverage will **not** apply retroactively. You must complete your enrollment in IvyBenefits and pay the required premiums in order to secure coverage.

EXAMPLE: Using the timing example above, you have single coverage under the College's health plan, and your spouse loses their health coverage through their employer on April 30, 2020. Normally you have until May 31, 2020 to enroll your spouse, but now you have until October 29, 30 days after September 29, 2020, due to ignoring the Outbreak Period.

EXAMPLE: If your spouse's coverage ended on February 15, 15 days before the Outbreak Period began, and the original special enrollment deadline would have been March 17, the extended deadline to elect special enrollment would be October 15, 15 days after the end of the Outbreak Period.

COBRA Elections and Notices

If you and/or your dependents experienced a COBRA Qualifying Event on or after January 1, 2020, and you have not elected COBRA continuation coverage for yourself and/or your dependents, you now have additional time to enroll, even if the normal deadline has passed. A Qualifying Event is an event that results in a loss of health plan coverage, and triggers a right to elect COBRA continuation coverage. These include:

- Termination of employment or reduction in hours
- Divorce
- Death of the employee
- Dependent child ceasing to satisfy the dependent eligibility terms

You normally have 60 days to elect COBRA continuation coverage after the later of the date you lose coverage due to a Qualifying Event or the date you are provided notice of your COBRA rights from the group health plan. In some cases, you must notify the plan of a Qualifying Event (such as divorce or a dependent child ceasing to qualify as a dependent) within 60 days of the event. Under the extension, the calendar days falling within the Outbreak Period do not count in determining your 60-day period.

EXAMPLE: Assume that the National Emergency ends July 31, 2020, such that the Outbreak Period ends September 29, 2020 (60 days thereafter). Mike's hours are reduced such that he is no longer eligible for coverage under the College's health plan, and he is provided a COBRA election notice on April 1, 2020. Mike normally would have until May 31, 2020, to elect COBRA continuation coverage. However, since the Outbreak Period is disregarded in determining his 60-day period, the last day of Mike's election period is 60 days after September 29, 2020, which is November 30, 2020.

You must complete a COBRA election form and pay the required premiums in order to secure COBRA coverage.

COBRA Premiums

If you and/or your dependents elected COBRA continuation coverage, you now have additional time to make COBRA premium payments that are due on or after March 1, 2020. If your COBRA continuation coverage was terminated because of a late or missed payment that was due on or after March 1, 2020, you may be eligible to reinstate your coverage.

You normally have 30 days to make your monthly COBRA premium payment (45 days in the case of the initial payment). Under the extension, the calendar days falling within the Outbreak Period do not count in determining your 30-day period (or 45-day period).

EXAMPLE: If an employee terminated employment December 1, 2019 and elected COBRA, and the monthly premium is due the first day of each month, premiums due beginning February 1, 2020 and throughout the Outbreak Period have an extended due date. The premium due February 1 would have a 30-day grace period until March 1, 2020, and ignoring the Outbreak Period assumed to end September 29, the February premium would be due September 30, 2020. Premiums for March 1 through September 1 would be due by October 30.

COBRA participants are not required to make COBRA premium payments during the Outbreak Period, but these payments are not being waived or reduced. All back premiums will be due in full after the Outbreak Period ends in order to maintain continuous coverage. A partial payment will result in COBRA continuation coverage for the months covered by the partial payment only. No COBRA continuation coverage will be provided for any month for which a premium payment is not timely made after the Outbreak Period ends.

If you believe either of the COBRA extensions applies to you, please contact Chard Snyder at 888-993-4646 or www.chard-snyder.com for more information about your options.

Claims for Benefits and Appeal Timeframes

The College's health plan states specific timelines for you to file a benefit claim, appeal an adverse benefit determination, or, if applicable, request an external review. Under the extension, the calendar days falling within the Outbreak Period do not count in determining any time period applicable to the filing of a benefit claim, the appeal of an adverse benefit determination, or a request for external review.

If you have questions about the applicable time frames that apply to filing claims and/or appeals for health benefits, please contact Anthem Member Services at 833-571-0829.