

Reminder: Upcoming Deadline to Provide COBRA Subsidy Expiration Notice

August 17, 2021

The American Rescue Plan Act of 2021 (the "**ARPA**") provides a 100% COBRA premium subsidy (the "**COBRA Subsidy**") to certain COBRA qualified beneficiaries, which we previously reported on [here](#), [here](#), and [here](#). Under the ARPA, the COBRA Subsidy is set to expire on September 30, 2021. The ARPA requires that certain notices be sent to affected qualified beneficiaries regarding the COBRA Subsidy, including a notice of the upcoming expiration of their premium assistance. This expiration notice must be sent no fewer than 15 days and no more than 45 days before an individual's COBRA Subsidy expires. The DOL has released a model "Notice of Expiration of Period of Premium Assistance" that plans may use to satisfy the notice requirement. Because the COBRA Subsidy is set to expire on September 30, 2021, the deadline to send out the expiration notices is quickly approaching. Employers are reminded to contact their third-party COBRA administrators, and to take any other necessary actions, to ensure that such notices are timely sent.

The model "Notice of Expiration of Period of Premium Assistance" is available [here](#).