

COBRA Deadline Extensions Guidance Table

Deadline Relief	Required or Optional?	Normal COBRA Deadline	Who Does the Relief Apply To?	New COBRA Deadline*	Expiration Date of Relief
Employer – COBRA Qualifying Event Notice Deadline	Required	Up to 44 days after COBRA qualifying event	The employer/plan administrator who provides the election notice to a qualified beneficiary if the original deadline occurred on or after March 1, 2020	Up to 44 days after the Outbreak Period**	Unknown at this time
COBRA Election Period Deadline	Required	60 days after the COBRA QE Notice is mailed	A qualified beneficiary whose 60-day election period deadline expired on or after March 1, 2020	Up to 60 days after Outbreak Period**	Unknown at this time
COBRA Initial Premium Payment	Required	45 days after COBRA election made	A qualified beneficiary whose 45-day initial payment deadline expired on or after March 1, 2020	Up to 45 days after Outbreak Period**	Unknown at this time
COBRA Premium Payments (other than initial payment)	Required	30 days after premium due date	A qualified beneficiary whose 30-day premium payment deadline expired on or after March 1, 2020	Up to 30 days after Outbreak Period**	Unknown at this time

HIPAA Special Enrollment and COBRA Qualifying Events Guidance Table

Deadline Relief	Required or Optional?	Normal Deadline	Who Does the Relief Apply To?	New Deadline*	Expiration Date of Relief
HIPAA Special Enrollment: 1) Addition of dependent through birth/adoption/marriage 2) Loss of health coverage of employee/dependent 3) Termination of Medicaid/CHIP or eligibility for premium assistance	Required	<ul style="list-style-type: none"> • Items 1 & 2 must notify on or before 30 days after the event (check plan for timing) • Item 3 must notify on or before 60 days after the event (check plan for timing) 	Any benefits-eligible and active employee or COBRA-qualified beneficiary who incurs such an event (coverage retroactive for births/adoptions)	<ul style="list-style-type: none"> • Items 1 & 2 must notify on or before 30 days after Outbreak Period** • Item 3 must notify on or before 60 days after Outbreak Period** 	Unknown at this time
COBRA Qualifying Events: 1) Divorce or legal separation 2) Child reaching maximum age of coverage	Required	Must notify on or before 60 days after the event (check plan for timing)	Any benefits-eligible and active employee or COBRA-qualified beneficiary who incurs such an event	Most notify on or before 60 days after Outbreak Period**	Unknown at this time
Disability Notification	Required	Must notify of disability on or before 60 days from the later of: <ul style="list-style-type: none"> • Date of Social Security Administration disability determination; • Qualifying event date; or • Loss of coverage date Must notify 30 days after no longer disabled	A qualified beneficiary	<ul style="list-style-type: none"> • Must notify on or before 60 days after Outbreak Period** or if later the latest of the three notification dates • Must notify 30 days after the Outbreak Period if no longer disabled 	Unknown at this time

* Days prior to March 1, 2020 may be counted toward the deadline after the Outbreak Period.

** Outbreak Period = 60 days after the announced end of the National Emergency.

