ARPA COBRA Subsidy Timeline

03/11/2021

The American Rescue Plan Act is enacted, which includes the COBRA subsidy (the "ARPA subsidy"), along with a requirement for the Department of Labor (DOL) to issue guidance regarding the APR subsidy process.

04/01/2021

First day of ARPA subsidy period.

04/07/2021

DOL guidance issued.

End of April/Early May

Initial Notice Mailing

Initial notice will be generated and mailed for Assistance Eligible Individuals (AEIs) who experienced a reduction in hours and/or an involuntary termination from 11/2019 through present.

05/18/2021

IRS releases Notice 2021-31, providing additional guidance and examples on the administration of the ARPA COBRA Subsidy.

End of June/Early July

Initial Notice Deadline
60-day deadline for AEIs to request coverage for the ARPA subsidy.

Notice of Expiration Notice
A second COBRA notice will be issued to AEIs who receive the ARPA subsidy within 15-45 days of expiration date, at the earlier of:

- The expiration of the AEIs COBRA eligibility ; or
- 09/30/2021 – the end of the ARPA subsidy period.

09/30/2021

Last day of the ARPA subsidy.

©EBPA LLC