



# CLIENT ALERT

Client Alert Applies To: Self-Funded, Fully-Funded, Large Group, and Small Group

**August 19, 2021**

## ARPA COBRA Subsidy: Notice of Expiration Requirement

The American Rescue Plan Act (ARPA) provided COBRA premium assistance to certain “assistance eligible individuals” (AEIs) for the period of April 1 – September 30, 2021. ARPA also imposed certain notice obligations on employers sponsoring group health plans, including the Notice of Expiration that must be provided to AEIs whose ARPA COBRA subsidy is expiring on September 30, 2021. The Notice of Expiration must be provided sometime between August 16, 2021 and September 15, 2021.

The U.S. Department of Labor has provided model forms that can be used. Links to English and Spanish versions of the Notice of Expiration can be found here: <https://www.dol.gov/agencies/ebsa/laws-and-regulations/laws/cobra/premium-subsidy-for-employers-and-advisers>. Employers should check with their COBRA administrators to ensure this notification requirement is met.

Please visit [www.moreton.com/news-events/](http://www.moreton.com/news-events/) for more information and to view other client alerts. This Client Alert was written by Carolyn Cox, who provides our clients with compliance services. For additional questions, please contact Carolyn at 801-715-7110 or [ccox@moreton.com](mailto:ccox@moreton.com).

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