ARPA COBRA Subsidy - Update from ABG 5/6/2021

This email blast is intended to be a brief update since our last communication. We are working on finalizing some details with our vendor and will be sending a full update on Monday, May 10, 2021 with sample copies of letters, and outlining the process start to finish. We appreciate everyone's diligent attention to updating AEIs in the system. Our team is focused on answering any questions relative to that process as quickly as possible so that everyone can meet the 5/7/2021 deadline.

KEY TAKAWAYS:

- ONE DAY TO GO: AEI statuses need to be updated in the Portal by 5/7/2021 to ensure notifications are sent by 5/31/2021
 - O View the communication from 4/22/2021 with AEI instructions here: ARPA Update from ABG 4/22/2021
- Sample letters will be available next week
- Attestation Request Forms can be accepted through the end of the business day tomorrow, 5/7/2021. ABG ARPA Attestation Request Form

Do we need to continue updating the AEI statuses for any new QBs?

- At this time, yes. This will be the case at least through 5/14/2021 and perhaps beyond. We are working on clarifying this process with our vendor and hope to have additional information available next week.
- New QBs with a First Day of COBRA after 4/1/2021, that are added after 5/14/2021 will automatically be sent the updated Specific Rights Notice including the ARPA verbiage.
 - o Samples of these updated communications be available next week.
 - o ARPA requires that this updated verbiage be provided to all QBs, regardless of the qualifying event.
 - o There is no additional fee for the required ARPA verbiage on a go-forward basis.
 - These letters will follow the normal overnight processing schedule and be mailed the next business day.

When will the letters go out?

- The letters will be mailed **before** May 31, 2021, as required, as long as the AEI statuses were updated by 5/7/2021.
- Letter processing will begin on 5/14/2021.
 - o As letters are mailed a copy of the letter will be available in the "Communications" tab of each Members' record
 - ARPA Letters that are mailed will also be visible on the Generated Letter Detail Report and the Generated Letters Summary
 Report. These reports can be accessed in the Employer Portal under "Imports & Reports" | "Standard Reports"

What letters will the Members receive?

- Only Members in the look-back period with an AEI status of **ELIGIBLE** will receive ARPA notifications.
- The notification they receive will depend on their status, and first day of COBRA.
- A detailed chart of what each Member will receive depending on their ABG Status, AEI status and first day of COBRA will be provided in next week's communication.

What if someone has already paid April or even May's premium?

- Those premiums will be automatically applied to the next premium due (October, November,)
- If the Member wants to be refunded for that premium, they will be able to request such a refund from our Support Team. Refunds will be processed twice a month.

We have decided we would like to include an Attestation, can we still request this?

 Previously this deadline was 5/5/2021; however, we can continue to accept Attestation Forms through the end of the business day 5/7/2021. Complete and return the ABG ARPA Attestation Request Form to cobrasupport@amben.com

We do not want ABG to handle the ARPA Notifications and will send them ourselves. Do we need to do anything for this?

- Please contact cobrasupport@amben.com for a copy of the Opt-Out Form to review and submit.

We have updated the AEI status for several individuals, but decided we do not want ABG to handle the ARPA Notifications. What can we do?

- By using the AEI utility, whether manually or the upload, Employers are agreeing to the \$15/QB fee.
- If an AEI status is set to Eligible, and the required ARPA notifications are sent, a \$15/QB fee will apply.
- If an AEI status is changed back to "Unknown" on or before 5/7/2021, no ARPA notifications will be sent, and no fee will be charged.
- Employers choosing to administer the ARPA subsidy on their own will need to complete and return an Opt-Out Form. Please email cobrasupport@amben.com for this form.

What's Next?

The following questions will be answered in our next communication:

- What will be the process for the QBs?
- What do the letters look like?
- What letters will each person receive?
- What do QBs do in the meantime?
- What if we already have an employer subsidy on the Member's account, and they are eligible for the ARPA subsidy?
- What is the overall process?

LINKS TO PREVIOUS COMMUNICATIONS:

- ABG ARPA Announcement http://mycobraresource.com/cobra_documents/ABG_ARPA_Announcement.pdf
- 3/29/2021 Update http://mycobraresource.com/cobra_documents/ARPA_UPDATE_MARCH_2021.pdf
- 4/5/2021 Update http://mycobraresource.com/cobra_documents/ARPA_UPDATE_04052021.pdf
- 4/7/2021 Update (Model Notices) http://mycobraresource.com/cobra_documents/ARPA_UPDATE_04072021.pdf
- 4/19/2021 Update http://mycobraresource.com/cobra documents/ARPA UPDATE 04192021.pdf
- 4/22/2021 Update http://mycobraresource.com/cobra_documents/ARPA_UPDATE_04222021.pdf
- FAQ: http://mycobraresource.com/cobra_documents/ABG_ARPA_COBRA_SUBSIDY_FAQ.pdf