

## Reminder: Employers Have Until September 15 to Issue COBRA Subsidy Termination Notices

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As **previously reported**, the American Rescue Plan Act (ARPA) provides for government-subsidized COBRA payments for a COBRA qualified beneficiary who becomes eligible for COBRA due to a reduction in hours or involuntary termination of employment from April 1, 2021, through September 30, 2021.

As part of the notice requirements of the ARPA, COBRA subsidies, employers and plan administrators are required to provide subsidy termination notices to qualified beneficiaries receiving subsidized COBRA payments before the subsidy ends.

The subsidy termination notices are due no more than 45 days and no less than 15 days before the date that the COBRA subsidy will end for the individual. For many individuals, this means that the notices must be sent between August 16 and September 15 to reflect the end of the COBRA subsidy period on September 30, 2021.

The U.S. Department of Labor has issued a **model notice** that may be used to inform individuals that the subsidy is ending. The notice is not required if the COBRA subsidy is terminated due to eligibility for another group health plan or Medicare.

If you need assistance with providing the subsidy termination notice, please contact a Laner Muchin Employee Benefits attorney.

### Attorneys

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### Practice Areas

Affordable Care Act, HIPAA  
and COBRA Compliance

Employee Benefits and  
Executive Compensation