

2021 ARPA Compliance

What Do Employers Need to Do?

START HERE

Did you offer group health coverage at any time between November 2019 through September 2021?



YES



NO

Nothing else is required at this time.



If you're subject to COBRA: Were there any involuntary terminations from coverage or layoffs affecting covered employees, spouses or dependents from 11/2019 to present?

NO

If you are under 20 employees and not subject to COBRA: Are you in a state with continuation of coverage?
OH, KY: Yes
IN, MI: No

YES

Was/is the employer plan level-funded or self-funded?



YES



NO

There is nothing further for you to do at this time.

YES

NO

Between 4/1/2021 and 9/30/2021, if there are any involuntary terminations from coverage or layoffs affecting covered employees, spouses, or dependents.



Do you have a COBRA vendor/administrator?

YES



NO



NO

YES

Great! If you haven't already, please prepare to notify them of any qualified individuals who will receive the ARPA COBRA subsidy. See this grid for details by carrier and product for what they need you to do.

Please contact your ARC Client Advisor to review COBRA Administration options.

You may be required to provide the ARPA alternative model notice to any Assistance Eligible Individuals by 5/31/2021. The notice is available on the ARPA communication piece under "Resources".



Do you have any questions?

YES

Contact your ARC Client Advisor for more help or information!

This graphic is a visual summary based on guidance through 4-30-2021. It does not constitute legal or tax advice nor is it a full description of all requirements.