

## **Special Notice regarding COVID-related deadline extensions**

On April 29, 2020 the IRS and Department of Labor announced an extension of certain deadlines during the one-year period from March 1, 2020 through February 28, 2021 (the "Outbreak Period"). In general, deadlines were extended for the following:

- Qualifying Life Events
- Filing HRA claims
- Filing FSA and Dependent Care FSA claims
- Filing benefit claims or appeals or requesting an external review of an adverse benefits determination.
- Making COBRA elections and COBRA premium payments.

Just before the expiration of the Outbreak Period, the Department of Labor issued additional guidance. The guidance removed February 28<sup>th</sup> as the end of the Outbreak Period and instead stated that the one-year period of relief would be extended for individuals, on a case-by-case basis, through the earlier of:

- One year from the original due date, OR
- The end of the Outbreak Period, once it is declared.

The maximum extension period available for an individual will not exceed one year.

### **How could this affect you?**

The following examples are included to demonstrate the impact of the recent deadline extension:

**Example 1:** If an employee had a 2019 FSA or Dependent Care FSA, all receipts for 2019 claims would normally be due by March 31, 2020. The extended deadline would now allow you until March 31, 2021 to file claims for your 2019 FSA.

**Example 2:** If an employee had a 2020 FSA or Dependent Care FSA, all receipts for 2020 claims would normally be due by March 31, 2021. The extended deadline would now allow you until the earlier of March 31, 2022 or the end of the Outbreak period.

**Example 3:** The normal timeframe to submit a claim to Oxford is ninety days. The extended deadline would allow you until, the earlier of, one year after the normal 90 day deadline or the end of the Outbreak period.

We understand that these changes may be confusing. If you have any questions regarding the COVID related deadline extensions, please contact the Benefits Department at 718-990-2363 for assistance.