



# Voluntary Hospitals House Staff Benefits Plan

## Summary of Material Modification (SMM)

This is to advise you about a new rule regarding extensions on certain deadlines that were granted during the COVID-19 National Emergency. Please read this notice carefully as your deadline may be expiring soon. This notice replaces any previous notice you may have received from us regarding this matter, such as the notice that was sent to you with any COBRA election form.

As you may be aware, last year, due to the COVID-19 National Emergency, the federal government extended certain deadlines for health plan participants and beneficiaries. The extensions applied to the following deadlines:

- filing an initial claim for benefits
- filing an appeal of a claim denial
- requesting and perfecting an external review of an appeal denial, if applicable
- electing COBRA continuation coverage
- making payments for COBRA continuation coverage<sup>1</sup>
- notifying the plan of qualifying events or disability<sup>2</sup>
- filing for HIPAA special enrollment

**Under new guidance issued by the government, if your deadline to take any listed action falls (or fell) on March 1, 2020 or later, you are entitled to additional time to take that action until the earlier of (a) one year from the original deadline (not considering any extension) or (b) 60 days after the announced end of the COVID-19 National Emergency. However, in no event will your deadline be extended more than one year.**

For example, let's say you have a deadline of 60 days starting on April 1, 2021 to take an action listed above, such as electing COBRA. In that case, your normal deadline would be May 31, 2021, 60 days after April 1. However, under this new guidance, your time period will not start running until 60 days after the announced end of the COVID-19 National Emergency. If the announced end is October 10, 2021, your new deadline period would start to run on December 9, 2021, 60 days after the announced end. In this example, with a 60-day deadline, your extended deadline would be February 7, 2022, 60 days after December 9, 2021. If the National Emergency has not ended, however, your deadline cannot go past May 31, 2022, since it cannot be extended more than one year.

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<sup>1</sup> Note you will still have to make full and timely payment of COBRA premiums retroactive to the first day for which you are eligible for COBRA coverage, in the event that you timely elect COBRA coverage. If you fail to make payment by the first day for which you are eligible for coverage or by the first day of any subsequent month of coverage, your COBRA coverage will be terminated; any claim for benefits submitted while your coverage is terminated may be denied and the claim may have to be resubmitted once the premium payment is received for the month in which the claim was incurred. In order to be covered for any month in the extended COBRA election and payment period, you have to pay the premium for that month and all preceding months.

<sup>2</sup> You are still required to notify us if you get divorced or your child reaches age 26 within 60 days of the divorce or birthday, regardless of whether you or your dependent is going to elect COBRA; this deadline has not been extended.



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Because some individuals' deadline may have already passed or are fast approaching, the Plan is granting an additional extension for anyone whose extended deadline would have fallen within 60 days of the date of this notice, **March 23, 2021 + 60 days**. Your extended deadline will not be earlier than this date.

You should carefully review your communications from the Plan regarding your deadline to determine what your original deadline was or is, so you can determine what the extended deadline is. **Please be on the lookout for any future communications from us regarding this extension, which is subject to change based on further guidance or rules from the government. Please also be on the lookout for communications from the Plan regarding temporary COBRA subsidies that some of you may be eligible for.**

If you have any questions, please contact the Fund Office at [benefits@cirbenefitfunds.org](mailto:benefits@cirbenefitfunds.org) or via phone at (212) 356-8180.