

**From:** [OCA COBRA Department](#)  
**To:** [Nicole Sgroi](#); [Ross Honig](#)  
**Subject:** Action Required: COBRA Subsidy Verification  
**Date:** Monday, April 05, 2021 10:34:51 AM  
**Attachments:** [nkf2n1a702ffdf68f4eaf9390b00301f1a1c9.png](#)

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## ARPA/COBRA Subsidy Verification

On Thursday, March 11, 2021 President Biden signed the [The American Rescue Plan Act \(ARPA\) of 2021](#). ARPA establishes a 100% COBRA premium subsidy for eligible assistance individuals (AEIs) during the period beginning on April 1, 2021 and ending on September 30, 2021. Historically, the industry (OCA included) did not track voluntary vs. involuntary terminations when determining COBRA eligibility. However, ARPA requires that only those with an involuntary termination or a reduction of hours will qualify as an AEI.

### Client Action Required

#### Step 1- Update Attached Excel File

- We have attached your company's list of potential AEIs. We ask that you review and update the attached file by reaffirming the "termination type" in column H.
- If you had an eligible individual(s) who either did not previously elect COBRA or elected but let their coverage lapse prior to OCA administering COBRA services, they may still qualify for the COBRA subsidy. Please add those

individuals to the excel workbook on the sheet labeled "Additional QBs".

## Step 2- Complete OCA's Subsidy Verification Form

- Please submit the updated file by completing OCA's Subsidy Verification Form. To do so, please click the button below.
- You will be asked to enter your employer key . **Your employer key is 8596** (this is required to complete the form).

**Submit Subsidy Verification**

If OCA does not hear from the employers/brokers by April 30, 2021 (or prior to OCA mailing the special election notice), OCA will assume the termed employee was involuntary terminated, resulting in the AEI receiving the special election notice. Please note that OCA will be charging a one-time special per notice fee of \$2.25.

To stay up to date on ARPA, please visit [OCA's COBRA Subsidy Resource page](#).

# Benefit Administration Done Right