



Connecticut Pipe Trades Health Fund

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IMPORTANT NOTICE

March 2021

The Trustees of the Connecticut Pipe Trades Health Fund ("Fund") have issued this notice to: (1) provide information on the new COBRA subsidy under the American Rescue Plan Act of 2021, (2) inform you of the extension of certain Fund deadlines due to the COVID-19 pandemic, (3) inform you of the Fund's coverage of the COVID-19 vaccine, and (4) provide other important reminders.

1. **The 100% COBRA Subsidy under the American Rescue Plan Act of 2021.** As you likely heard in the news, President Biden signed the American Rescue Plan Act of 2021 (the "ARPA") into law on March 11, 2021. The ARPA includes a 100% COBRA subsidy for certain eligible qualified beneficiaries for a maximum period of up to six (6) months, which runs from April 2021 through September of 2021. We must stress that this 100% COBRA subsidy is available only to those Connecticut Pipe Trades Health Fund participants (and any of their qualified beneficiaries) who lose, or have previously lost, their Fund coverage *as a result of an involuntary: (i) job loss or (ii) reduction in hours*. Also, even if you are eligible for this 100% COBRA subsidy, it can end earlier than the six-month period noted above, if you become eligible for coverage under another group health plan (such as a spouse's plan) or Medicare. The 100% COBRA subsidy is not available in other situations where Fund coverage is lost, and examples would include a spouse under the Fund losing coverage due to divorce from, or death of, his or her Connecticut Pipe Trades member spouse, or an Eligible Dependent child attaining age 26.

What's Next?? ARPA requires the federal government to issue standard forms for this 100% COBRA subsidy in early April, so the Fund will be updating its current COBRA forms as soon as we possibly can. The Fund will also be sending a separate notice to those Fund participants who previously lost coverage and could qualify for the 100% COBRA subsidy starting in April, so please watch out for that separate notice.

2. **Information about COVID-19 Disaster Relief.** The Fund's Board of Trustees knows that the COVID-19 pandemic has had a significant impact on all Fund participants and beneficiaries, and we want to remind you that certain relief is available under guidance issued by the Employee Benefits Security Administration ("EBSA"). Keeping things high level, you know that our Fund has numerous deadlines to take action regarding the time that a claim or appeal must be filed, such as when a special enrollment right must be requested with the Fund, when COBRA elections must be filed with the Fund, and when monthly COBRA premiums must be paid.

Under the EBSA's guidance, certain specified Fund deadlines for Fund participants and beneficiaries, which would have occurred on or after March 1, 2020, have been extended. These extensions last until the *earlier of*: (a) one (1) year from the date that the applicable Fund deadline would have otherwise occurred, or (b) 60 days after the announced end of the National Emergency period with respect to the COVID-19 pandemic (which is still ongoing). So, in no instance will an extension relief period exceed one year. The guidance further notes that this relief is to be provided on an individual basis to each Fund participant and beneficiary. Here are some representative examples of how this EBSA guidance works:

Example #1: Assume you lost Fund coverage as of January 31, 2020, and the Fund provided you with a COBRA notice the same day. You would typically have had until March 31, 2020 (60 days after the COBRA notice was provided), to make a COBRA election and an additional 45 days after the election to make the first COBRA premium payment. However, per the EBSA guidance, your COBRA election period "clock" stopped as of March 1, 2020 (30 days into your 60-day election period). In addition, under the EBSA guidance the one-year period outlined in (a), above, applies to you, so your applicable extension would have ended on February 28, 2021. Therefore, assuming you have not yet elected COBRA, your COBRA election period clock restarted on March 1, 2021, giving you the remaining 30 days of the 60-day election period, or until March 31, 2021, to elect COBRA, and then an additional 45 days to make the initial COBRA premium payment.

Example #2: As a follow up to Example #1, assume you had instead lost Fund coverage as of June 30, 2020, and the Fund provided a COBRA notice the same day. Under these facts, you would have normally had 60 days from July 1, 2020 to elect COBRA (so by August 29, 2020). Here, under this example, your EBSA extension will run until the earlier of: (a) July 1, 2021 (the end of your individualized one-year maximum suspension period), or (b) 60 days after the announced end of the National Emergency for COVID-19. Assuming here that the National Emergency continues through at least June of 2021, you would need to elect COBRA by August 29, 2021, and would have an additional 45 days to make your initial COBRA premium payment.

Since every Fund participant and beneficiary has different health care needs and his or her own unique circumstances, it is simply impossible for us to provide examples of all the various situations where this EBSA relief could apply. However, in the event that you may be facing a Fund deadline and are unsure whether this EBSA relief is available to you, please utilize the contact information at the end of this Notice for further information on whether you may qualify for an extension. In addition, this Notice is intended to comply with EBSA Disaster Relief Notice 2021-01 by providing information as to the end of the relief period for those participants or beneficiaries that might be at risk of losing protections, benefits or rights under the Fund.

3. **Fund Coverage of the COVID-19 Vaccines.** Pursuant to federal law, please be aware that the Fund will cover the cost of the COVID-19 vaccine and any charges for the administration of the COVID-19 vaccine, without any cost sharing to you (i.e., deductibles, coinsurance, or copayments) for in-network providers. During the COVID-19 Public Health Emergency as declared by the federal government, the Fund will also cover the full cost of the COVID-19 vaccine and the administration for out-of-network providers. Please note that when the COVID-19 Public Health Emergency ends, which will be some future date, then normal Fund rules will apply if you receive the COVID-19 vaccine through an out-of-network provider.
4. **Reminder on the Employee Assistance Program.** PLEASE remember during these difficult times that the Fund contracts with an Employee Assistance Program or "EAP" to help with problems and crisis situations. There is no charge to you for utilizing the EAP's services, but normal Fund charges for medical or mental health services can apply. While the EAP offers services throughout Connecticut, its name and phone numbers are: LOWER HUDSON VALLEY EMPLOYEE ASSISTANCE PROGRAM, 1-800-EAP-2799/1-800-327-2799/1-914-245-6300. If you or a family member are experiencing any of life's difficulties or have any other questions or concerns, please give the EAP a call.
5. **Reminder on Anthem's LiveHealth Online Program.** Telehealth services are extremely important during this COVID-19 pandemic, and the Fund wants to remind you that with Anthem's LiveHealth Online program you and your covered dependents can have a video visit with a board-certified doctor, psychiatrist, psychologist or licensed therapist directly on your smartphone, tablet or computer, from your home at no cost to you. We hope Anthem LiveHealth Online can be a resource to you and your family by providing prompt, professional assistance when you and your covered dependents need it. To use LiveHealth Online either download the app on your smart phone or visit the livehealthonline.com website, enter the required information, and then click on the "Sign Up" button. We strongly encourage you to use this program, as there is no copayment when seeing a physician using Anthem's Live Health Online. If you have any questions, please feel free to contact the Fund Office.

QUESTIONS? FUND CONTACT INFORMATION

If you have any questions about this Notice or any other item, please contact the Fund Office.

This Notice is intended to be a brief description of the topics described. In any situation involving Fund benefits, the documents governing the Fund will control. It constitutes a Summary of Material Modifications to the Fund, and we are furnishing it to you in accordance with U.S. Department of Labor regulations §§2520.104b-3 and 2590.715-2715(b). Please keep this Notice with your Fund Summary Plan Description and your most recent Summary of Benefits and Coverage for future reference, and contact the Fund Office directly with any questions. As a reminder, Fund benefits are not "vested" in any way, and all Fund benefits are subject to amendment and/or termination as the Trustees may determine to be in the best interests of the Fund's participants and beneficiaries.

BOARD OF TRUSTEES