

## Overview of Law

- On May 4, 2020, the Departments of Labor and Treasury published a notice of relief for group health plans (the “Notice”), extending a number of plan administration timeframes during the COVID-19 pandemic. Among other things, the Notice directs all group health plans to disregard customary claim and appeal timely filing requirements during the COVID-19 “Outbreak Period” which continues from March 1, 2020 to March 1, 2021.
- The Notice tolls timely filing deadlines that would have ordinarily expired during this Period. Said plainly, the Rules “freeze” timely filing deadlines between March 1, 2020 and March 1, 2021. Starting on March 2, 2021, the timely filing “clock” restarts from where it was frozen.

## Using Timely Filing Deadlines Examples

- A claim with a date of service before March 1, 2020 would have had the timely filing “clock” suspended on March 1. That “clock” restarts on March 2, 2021, allowing claims to be submitted and considered timely for the period of the timely filing days remaining.
- A claim with a date of service after March 1, 2020 but before March 1, 2021, would have the full timely filing period to submit the claim starting on March 2, 2021.
- A claim with a date of service after March 1, 2021 will be held to standard plan timely filing provisions.