



May , 2020

Re: Recent Department of Labor Information in Response to COVID-19

We have been monitoring the COVID-19 situation and how recent notices from the Department of Labor (“DOL”) may impact our customers’ plans under the Employee Retirement Income Security Act of 1974 (“ERISA”). We want you to be aware of these new requirements should your clients inquire. Please note that these requirements have an effective date that is retroactive beginning March 1, 2020.

The attached Regulatory Update contains important details about these requirements.

We understand that you may have questions about COVID-19 and the impact on your clients’ workforce. To help support our customers, we created a dedicated page on our website to keep track of the rapidly moving and evolving challenges for our customers. For up-to-date information, visit https://www.metlife.com/COVID-19_US_Customer/ or reach out to any member of your client’s Account Team.

Please do not hesitate to let us know if there is anything we can do to help.

[Account Executive]

REGULATORY UPDATE

The DOL, Internal Revenue Service, and Department of the Treasury have announced the extension of certain ERISA and Internal Revenue Code timeframes during the COVID-19 National Emergency. If your client's group health, disability, or other welfare plan is subject to ERISA, the following COVID relief is available.

The time period from March 1, 2020 until 60 days after the end of the National Emergency will not be counted in determining whether any of the below actions are timely:

1. The 30-day period (or 60-day period, if applicable) to request special enrollment in the group health plan upon experiencing certain enrollment events (*e.g.*, loss of eligibility for group health coverage or upon acquisition of a new spouse or dependent by marriage, birth, or adoption).
2. The 60-day election period for COBRA continuation coverage.
3. The date the plan is required to provide a COBRA election notice.
4. The date for making COBRA premium payments.
5. The date for individuals to notify the plan of a qualifying event or determination of disability.
6. The date within which individuals may file a benefit claim under the plan's claims procedure.
7. The date within which claimants may file an appeal of an adverse benefit determination.
8. The date for claimants to file a request for an external review after receipt of an adverse benefit determination or final internal adverse benefit determination.
9. The date within which a claimant may file information to perfect a request for external review.

Please be assured that if MetLife acts as claims administrator for any of your clients' ERISA benefit plans, MetLife has adjusted its claim process as needed to comply with all applicable requirements.

Information for plan fiduciaries or sponsors with respect to obligations under Title I of ERISA:

An employee benefit plan will not be in violation of ERISA for a failure to timely furnish a notice, disclosure, or document that must be furnished between March 1, 2020 and 60 days after the announced end of the COVID-19 National Emergency, if the plan acts in good faith and furnishes the notice, disclosure, or document as soon as administratively practicable under the circumstances. Good faith acts may include use of electronic alternative means of communicating with plan participants and beneficiaries, including email, text messages, and continuous access websites.

General ERISA Fiduciary Compliance Guidance: Plan fiduciaries should make reasonable accommodations to prevent the loss of or undue delay in benefits and should attempt to minimize the possibility of individuals losing benefits because of a failure to comply with pre-established timeframes.