



COVID-19 Update From Carriers

We realize that during these difficult and rapidly changing times you might have some questions regarding coverage for your company and employees. To that end, following is the current information from Florida Blue, United Healthcare and Humana. As always, we are available to assist, so please do not hesitate to contact us with any questions you have.



Florida Blue Group Eligibility:

1. My employer will be furloughing employees and/or reducing their hours worked. May we retain those employees on our group health plan coverage?

For Fully Insured groups:

- i. Florida Blue has adopted a non-enforcement policy will apply for currently enrolled eligible employees that will allow them to retain coverage as if they were active employees even if they are furloughed or drop below the minimum hours worked for full time employees, (e.g. 25 hours a week for small employers and generally 30 hours a week for large employers). This non-enforcement policy will apply until April 15th at which time we will reevaluate this decision.
- ii. Employers should be applying consistent policies regarding offering currently active employees experiencing a reduction in hours or furlough continued health insurance benefits. Employers are encouraged to consult with their own employment counsel on extending employment benefits such as health insurance to furloughed and/or employees that experience reductions in hours worked to ensure compliance with

federal and state labor laws.

For ASO/MPP groups:

- i. Florida Blue will continue the enrollment of any eligible employees sent to Florida Blue by the employer.
- ii. Florida Blue encourages self-funded groups to consult with their own benefits counsel in establishing consistent policies regarding continuing coverage for furloughed employees and/or those who experience a reduction in working hours.

2. My employer has terminated currently eligible employees as a result of the COVID-19 pandemic? What health benefits are available to such terminated employees?

Former employees have several options:

- i. Under state and federal law most employers must provide continuation of group coverage to employees under COBRA or state continuation (depending upon the size of the employer).
- ii. We are following the standard COBRA process for members that are disenrolled.
- iii. If terminated employee does not select COBRA, they will qualify for a special enrollment period for an individual policy. www.healthcare.gov

3. What can be done for groups unable to pay their premium due to COVID-19? Right now, we are following our normal payment and delinquency processes for both group and individual business.

Florida Blue hears your concerns and we are aware of the requests for premium payment deferrals. At this point executives are in discussions and Florida Blue is waiting for guidance from the Office of Insurance Regulations (OIR), therefore no decision has yet been made. As soon as we receive information, we will send out an updated message. Thank you for your patience during this unprecedented time.



Reduced Hours/Furlough

Through May 31, 2020, UnitedHealthcare is temporarily relaxing its requirement that employees be actively working to be eligible for coverage (medical/dental/vision/basic life) and will allow you to cover your reduced hour employees or furloughed employees, as long as the employer continues to pay the monthly premium. If the employer chooses to pay for their coverage, then you would NOT notify UHC/NHP of a coverage change and furloughed employees would remain on the plan. Please note that employers must offer this coverage on a uniform, non-discriminatory basis to all employees.

Waiting Period To Be Waived For Re-Hires

UHC/NHP will waive waiting periods for re-hired employees who are terminated due to Covid-19.

Mid-Year Plan Changes

During the next 90 days, and one time only, if an employer wishes to buy down their benefit plan, UHC/NHP will allow it. The group's effective date will not change. THIS IS ONLY AVAILABLE TO GROUPS CURRENTLY OFFERING A SINGLE PLAN DESIGN WHO WISH TO CHANGE THAT PLAN TO A LEANER OPTION.

Special Enrollment Period

Groups may choose to (but are not required to) offer a special enrollment period for 4/1/2020 effective date to employees and dependents who had previously waived coverage. A wage and tax statement will be needed to validate eligibility for employees. For Groups with multiple plans this Special Open Enrollment period is NOT intended to allow members to change plan options. Special Enrollment Period is open now thru 4/6/20.



The two most frequently asked questions we have heard are addressed in detail in the Employer FAQ:

1. Am I able to continue to cover employees if part or the entire workforce is laid-off in response to the COVID-19 pandemic? – Yes, as long as one person remains employed and covered by the plan AND monthly premium payment is required.
2. Will Humana allow a premium grace period? – Yes, Humana will continue to offer a 30-day grace period for premium payments, or applicable state law.