

# **UPMC Health Plan COVID-19 Guidance for Employer Groups**

**This information was forwarded to all UPMC Commercial Employers:**

**We recognize the concern and uncertainty you may feel regarding COVID-19, and we want you to know that the health and well-being of all of our clients and members is of paramount importance to us. We assure you that UPMC Health Plan and all of our affiliates within UPMC Insurance Services have plans in place to support you throughout this pandemic. In addition, we are taking a number of actions to help ensure that all of our members receive the care they need in a safe environment, and we are eliminating financial barriers to ensure that individuals who need COVID-19 testing have access.**

**As you likely know, on March 18, 2020, Governor Wolf ordered the closure of all non-life-sustaining businesses across the Commonwealth of Pennsylvania in an effort to slow the spread of COVID-19. UPMC Health Plan understands that this has led to many questions about how your coverage through UPMC Health Plan may be impacted if you need to adjust your workforce to comply with the Governor's order. In an effort to assist you, we've prepared the following FAQs. While we have tried to address the questions we think may be most at the top of your minds, we may not have thought of everything. If you have additional questions, your account manager is poised and willing to help answer them.**

## **Frequently Asked Questions**

**Q. My plan is fully insured. If I lay off part of my workforce in response to the COVID-19 crisis, can the company continue to cover those employees?**

**A. Yes. Through July 31, 2020, UPMC Health Plan is relaxing its requirement that employees be actively working to be eligible for coverage and will allow you to continue coverage for laid-off employees. Please note that you must continue to pay all monthly premiums and you must offer this coverage on a uniform, non-**

**discriminatory basis. In other words, you may not choose only certain people for whom you continue coverage and pay premium.**

**Q. My plan is fully insured. If I have to lay off my entire workforce in response to the COVID-19 crisis, can the company continue to cover those employees?**

**A. If one person remains employed by the company and covered by the plan (e.g., the owner or a management employee), the company can continue to cover laid-off employees as long as premium is paid. Please note that you must offer this coverage on a uniform, non-discriminatory basis. In other words, you may not choose only certain people for whom you continue coverage and pay premium.**

**Q. If I lay off a significant part of my workforce today, will coverage extend until the end of the month?**

**A. Unless a termination date is otherwise agreed to between the company and UPMC Health Plan, coverage will terminate on the last day of the last month for which we received premium.**

**Q. My plan is fully insured. Will UPMC Health Plan allow me to extend coverage to dependents who would otherwise be terminated for turning 26?**

**A. At the direction of the group, UPMC Health Plan will extend coverage for dependents who turn 26 in April or May, provided that premium is paid. If a dependent turns 26 in April, coverage may be extended through June 30, 2020. If a dependent turns 26 in May, coverage may be extended through July 31, 2020.**

**Q. If my group's enrollment drops by more than 15% as a result of the COVID-19 situation, will my rates/premiums be subject to change?**

**A. Through July 31, 2020, if the loss of enrollment is a result of the COVID-19 pandemic, rates and premiums will not be adjusted.**

**Q. Is UPMC Health Plan able to offer other coverage to employees who are losing their health insurance coverage after being laid off?**

**A: UPMC Health Plan can offer ACA-compliant Individual plans for those who**

have been laid off and lost employer-sponsored coverage. Those interested in an Individual plan should contact 1-877-563-0292 to speak with a UPMC Health Plan Direct Connect Sales Center Associate. Our associates can help consumers determine whether they qualify for premium tax credits to help reduce their monthly premium and, when applicable, can also refer individuals with qualifying income to be evaluated for Medicaid eligibility.

**Q: How soon will coverage be effective for those who enroll in an individual, ACA-compliant plan?**

**A: For plans sold on the federal exchange (the Marketplace), the Marketplace will determine the earliest allowable effective date, which may be the first day of the following month. For plans sold off the marketplace, accelerated effective dates may be available. Individuals interested in an individual plan should contact 1-877-563-0292 to speak with a UPMC Health Plan Direct Connect Sales Center Associate. Please note that premium subsidies may be available for plans purchased on the federal Marketplace. Premium subsidies are not available for off-exchange plans.**

**Q. What about COBRA continuation coverage if my plan is fully insured?**

**A. If your group is subject to COBRA, as long as one person remains actively employed employees may elect to continue coverage under COBRA under the normal notice and election procedure. If the plan has no active employees, the plan is terminated and COBRA is not an option. In that case, employees losing coverage would have a special enrollment period to enroll in individual or other coverage (e.g., through a spouse).**

**Q. My plan is self-insured. If I lay off part of my workforce in response to the COVID-19 crisis and plan to continue coverage, will my UPMC Health Plan stop loss policy still cover those employees?**

**A. Yes, as long as at least one person remains actively employed by the group. If UPMC Benefit Management Services is the third-party administrator for your self-funded plan and UPMC Health Benefits is your stop loss carrier, as long as you continue to pay administrative fees and claims costs, along with your stop loss premium, you may continue to cover laid-off employees under your stop loss policy through July 31, 2020 even though they are not actively at work.**

**Please note that you must administer the plan on a uniform, non-discriminatory basis. In other words, you may not choose only certain people for whom you continue coverage. If UPMC Health Benefits is not your stop loss carrier, check with your stop loss carrier about covering laid-off employees who are not actively at work.**

**Q. My plan is self-insured. If I have to lay off my entire workforce in response to the COVID-19 crisis and plan to continue coverage, can I maintain my UPMC Health Plan stop loss policy for all of the covered employees?**

**A. Yes, as long as one person remains actively employed by the group. If UPMC Benefit Management Services is the third-party administrator for your self-funded plan and UPMC Health Benefits is your stop loss carrier, and you continue to pay administrative fees and claims costs along with your stop loss premium, you may continue to cover laid-off employees under your stop loss policy through July 31, 2020 even though they are not actively at work. Please note that you must administer the plan on a uniform, non-discriminatory basis. In other words, you may not choose only certain people for whom you continue coverage. If UPMC Health Benefits is not your stop loss carrier, check with your stop loss carrier about covering laid-off employees who are not actively at work.**

**Q. What about COBRA continuation coverage if my plan is self-insured?**

**A. If your group is subject to COBRA, as long as one person remains actively employed, employees may elect to continue coverage under COBRA under the normal notice and election procedure. UPMC Health Benefits, as your stop loss carrier, will not limit the number of COBRA participants under the stop loss policy through July 31, 2020. If UPMC Health Benefits is not your stop loss carrier, check with your stop loss carrier about any rules it may have regarding minimum enrollment of active employees for stop loss coverage. If the plan has *no* active employees, the plan is terminated and COBRA is not an option. In that case, employees would have a special enrollment period to enroll in individual or other coverage (e.g., through a spouse).**

**Q. My plan is self-insured with 51+ employees. If I have to lay off a significant portion of my workforce in response to the COVID-19 crisis, will I need to change to a fully insured arrangement?**

**A. While UPMC Benefit Management Services does not generally administer self-insured plans with fewer than 51 employees, we will continue to administer your plan and will not require you to move to a fully insured arrangement as long as the layoffs are temporary in response to the COVID-19 crisis.**

**Q. What financial resources are available for consumers and businesses affected by the COVID-19 pandemic?**

**A. In light of the economic impacts of the COVID-19 outbreak, the U.S. and Pennsylvania governments and certain financial institutions have instituted a number of economic stimulus and relief initiatives for individuals and businesses. Please see the [attached](#) document for more information.**