



Frequently Asked Questions (FAQs) - Fully-insured group membership and premium payment policies during the COVID-19 situation

1. Will HAP allow employers to continue health care coverage for currently enrolled employees who are temporarily laid off or have had their hours reduced?

A. Yes, HAP will allow if the employer considers their employees actively employed (whether temporarily laid off or working reduced hours), their coverage can continue.

- If an employer temporarily “terminates” an employee from their payroll system so that the person can collect unemployment, it is up to the employer to determine if they consider that person an active employee who will be returning to work. If yes, they can continue their health care coverage.
- It is up to the employer group to monitor and manage their enrollment
- The employer is responsible for continuing to pay the premiums
- HAP will re-evaluate these parameters at the end of April

2. How will HAP handle new hires that are in their probationary/new-hire period?

A. The waiting period will not be affected for employees who were in their new hire/probationary period as of March 12, 2020 and are temporarily laid off or their hours are reduced.

3. If an employer needs to terminate employees temporarily from their health care coverage during this time, can they reinstate the employees’ health care coverage after they return to active employment without satisfying their waiting period?

A. Yes, when existing employees return to work, we will waive waiting periods for any group that does not have “immediate coverage” for employees indicated in their re-hire policy.

4. Is HAP allowing a special open enrollment while we are working through COVID -19 issues for those employees who previously waived coverage?

A. To help employees access care who may have previously waived coverage, we are providing fully insured small group clients the ability to establish a *special enrollment opportunity, due to COVID-19, to enroll employees who did not previous enroll.*

The opportunity will be limited to employees who previously did not elect coverage for themselves (spouses, children) or waived coverage. The enrollment opportunity will extend from March 24 to April 30, 2020. We will provide a “*Notice of Special COVID-19 Enrollment Opportunity*” to inform employees of this opportunity to enroll in their group health plan.

5. What if an employer needs to make enrollment changes due to life events and they are unable to do so right now?

A. From March 24, 2020 through April 30th, an employer may make enrollment changes for employees and their eligible dependents within 60 days. Employers can continue to send an email with eligibility changes to MB_Enrollment@hap.org or self-serve using the Employer Portal at www.hap.org.

6. What is HAP's standard premium payment grace period?

A. We plan to continue with our grace period as defined today. For insured employer groups, we have a 30-day grace period. COVID-19 is impacting us greatly and we will continue to monitor and adjust our approach as we see necessary.

7. What if employers cannot afford to pay their premiums, due to loss of business or shut down? Is there any relief?

A. We are handling this on a group by group basis; the employer group should reach out to HAP to discuss. We will work closely with our agents and employer partners to determine the best course of action.

Resources for small businesses:

<https://www.sba.gov/page/coronavirus-covid-19-small-business-guidance-loan-resources>

<https://sbdcmichigan.org/small-business-covid19/>

<https://www.detroitchamber.com/small-businesses-what-you-need-to-know-in-the-midst-of-covid-19/>

<https://sbdcmichigan.org/disaster-loan-help/>

8. If employers can no longer afford to continue covering their employees, what options do they have?

A. HAP has individual plans available at hap.org or by calling (855) 948-4427. Documentation showing loss of coverage will be needed – that can be obtained by calling HAP's customer service at (313)872-8100. Employees seeking assistance can go to www.healthcare.gov to find ACA plans that may offer premium tax credits.

9. Will HAP re-rate experience-rated groups due to fluctuations in eligibility due to the COVID-19 pandemic?

A: We do expect eligibility changes as a result of COVID-19. However, we have no plans to re-rate or change established rates due to these eligibility shifts in the short term.