



## Special Broker Bulletin: March 25, 2020 | FAQs

We know that you may have a lot of questions around COVID-19, and we want you to know that the health and well-being of all of our members is our top priority at this time. Rest assured, Geisinger Health Plan is prepared to support you throughout this pandemic.

All of our members will receive the care they need in a safe environment. We've eliminated financial barriers to ensure that individuals who need COVID-19 testing have access and we've partnered with Teladoc to allow our members to see a doctor for routine visits without having to leave the house.

On March 18, 2020, Governor Wolf ordered the closure of all non-life-sustaining businesses across Pennsylvania. Geisinger Health Plan is still open, and we will continue to provide access to care for our members.

However, we know that many other businesses have partially or fully reduced their workforce in response to the closure, leading to questions around employer group health coverage for out of work employees. We've prepared the following FAQs to address your concerns.

If you have additional questions, your account manager is standing by to answer them.

**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 June 30, 2020, Geisinger 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 this is subject to all monthly premiums being paid and coverage offered on a uniform, non-discriminatory basis. You may not choose only certain people for whom you continue coverage and pay premium.

**Q. My plan is fully insured. If I must 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 through June 30, 2020 if 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. Coverage will terminate on the last day of the last month for which we received premium payment unless otherwise noted on the Geisinger Health Plan Change Form. The employer's request should indicate the last day of coverage.

**Q. How will I handle adding staff back to group health plan coverage after a period of layoff, furlough, or a period of termination with rehire?**

A. An employee returning from layoff or leave is eligible to enroll if they were covered by the Plan before their departure and they meet eligibility criteria. When the new application is submitted, write "recalled from layoff" across the top. The effective date will be the day they return to work.

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

A. If your group is subject to COBRA and 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. What about COBRA continuation coverage if my plan is self-insured?**

A. If your group is subject to COBRA and one person remains actively employed, employees may elect to continue coverage under COBRA under the normal notice and election procedure. If Geisinger is your stop loss carrier, GHP will not limit the number of COBRA participants under the stop loss policy

through June 30, 2020. If Geisinger 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. 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 June 30, 2020, if the loss of enrollment is a result of the COVID-19 pandemic, rates and premiums will not be adjusted due to enrollment change.

**Q. As an employer I offer a Qualified High Deductible Health Plan (QHDHP). Are my employees able to pay for 2019 Novel Coronavirus (COVID-19)-related testing and treatment, without jeopardizing their qualified status?**

A. QHDHPs will not lose that status merely because they cover the cost of testing for or treatment of COVID-19 before plan deductibles have been met. The IRS notice 2020-15 also noted that, as in the past, any vaccination costs continue to count as preventive care and can be paid for by an QHDHP.

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

A: Geisinger Health Plan can offer ACA-compliant Individual plans for those who have been laid off and lost employer-sponsored coverage, and those individuals may be able to benefit from premium subsidies (Advanced Premium Tax Credits). Those interested in an Individual plan should contact 1800-918-5154 to speak with a Geisinger Health Plan Individual Sales Center Associate. Our associates can help consumers determine whether they qualify for premium subsidies to help reduce their monthly premium and, when applicable, can also refer individuals with qualifying income to be evaluated for Medicaid eligibility.

If you have furloughed employees/members that are 65 years of age or older, please have them call Geisinger Gold at 1-877-821-5056 to review their options into one of our Medicare Advantage plans. We offer all in one \$0 deductible health plans that include prescription drugs, as well as optional supplemental benefits such as dental, vision, hearing, and even gym memberships all with monthly premiums as low as \$0. We encourage them to call as soon as possible to review their eligibility.

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

A: For plans sold on the Federally Facilitated Marketplace (FFM), the FFM 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 1-800-918-5154 to speak with a Geisinger Health Plan Individual Sales Center Associate. Please note that premium subsidies may be available for plans purchased on the FFM. Premium subsidies are not available for off-exchange plans.

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