

From: [Joyce](#)
To: [Jason Powers](#)
Cc: [Bob Dill](#); [Rick Finfera](#)
Subject: Re: COVID-19 impact on Actively at Work provisions
Date: Friday, March 20, 2020 12:17:56 PM

Jason,

If an employee is termed and comes back within 30 days, they can be reinstated with no lapse in coverage (this info is on the BPA-in Section 8).

If gone longer than 30 days, we are waiting for direction from BCBS if there is a waiting period when they come back (right now current provision is if gone longer than 30 days, employees must exhaust the waiting period again).

BCBSIL is not going to require the employer to term coverage for these FT employees that are not actively at work. This would be more of a legal issue. If the employer is terminating the employee's employment, the employee would be offered continuation coverage (COBRA or IL Continuation based upon the total size of the group).

The employer may keep the coverage in place. Please advise the employer needs to make sure their internal policy is updated with specifics for this type of issue/crisis and is consistent for all eligible employees.

Also please watch for updates in the News from the Blues as we have been told to do this as well. If you do not receive the News from the Blues, let me know and I will ask BCBS to add you to the distribution list.

Thanks,
Joyce
Baughman Insurance

From: Jason Powers <jasonp@legacybrokerskc.com>
Sent: Friday, March 20, 2020 11:24 AM
To: Joyce <joyce@baughmaninsurance.com>; Bob Dill <bobd@legacybrokerskc.com>
Cc: Rick Finfera <rickf@legacybrokerskc.com>
Subject: RE: COVID-19 impact on Actively at Work provisions

What is the rehire provision for BCBSIL? If they term the employees now, and bring them back in April, can the waiting period be waived and let them restart coverage 5/1?

From: Joyce <joyce@baughmaninsurance.com>
Sent: Monday, March 16, 2020 3:15 PM
To: Bob Dill <bobd@legacybrokerskc.com>
Cc: Jason Powers <jasonp@legacybrokerskc.com>; Rick Finfera <rickf@legacybrokerskc.com>
Subject: RE: COVID-19 impact on Actively at Work provisions

Bob,

BCBSIL is not going to require the employer to term coverage for these FT employees that are not actively at work. This would be more of a legal issue. If the employer is terminating the employees employment, yes the employee would be offered continuation coverage. Is the employer terminating these employees? (rhetorical) The employer may keep the coverage in place. Please advise the employer needs to make sure their internal policy is updated with specifics for this type of issue/crisis and is consistent for all eligible employees.

Please note the News from the Blues is a valuable resource and will be the line of communication as additional information/updates become available.

Thanks,
Joyce
Baughman Insurance
618-628-4284

From: Bob Dill <bobd@legacybrokerskc.com>
Sent: Monday, March 16, 2020 2:30 PM
To: Joyce <joyce@baughmaninsurance.com>
Cc: Jason Powers <jasonp@legacybrokerskc.com>; Rick Finfera <rickf@legacybrokerskc.com>
Subject: COVID-19 impact on Actively at Work provisions

Hi Joyce,

How will the policies on in force business handle claims incurred by members of group plans that temporarily shut down? In most cases, there is an "actively at work" provision that states employees must be actively working 30 hrs or more per week to remain eligible for coverage. Many organizations are beginning to respond to COVID-19 by temporarily or indefinitely shutting down and sending workers home, some without pay. Will those impacted workers continue to be covered by their group policy even though they are not actively working 30 hrs per week? Or will those employers be forced to offer COBRA/Continuation of Coverage (where applicable) in order to maintain coverage for the affected members?

If they will remain covered, please give us guidance on how long they will remain covered and excluded from any "actively at work" provisional eligibility. We need the official response that your carrier will stand behind so we can provide assurance to our clients.

Sincerely,

Bob Dill

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