

COVID-19 Updates for Employers

Marshfield Clinic Health System and Security Health Plan
Updated December 29, 2020

COVID-19 Vaccine Coverage

The COVID-19 vaccine will be covered in full with no member cost sharing for all plans.

IRS Notice Allows for Changes to Plan Elections During National Emergency

On May 12, 2020, the IRS released Notice 2020-29 which provides much needed plan year election relief for participants in Section 125 plans in general. The Notice was in response to the COVID-19 National Emergency as the pandemic altered the funding needs for many participants.

During the national emergency period, Security Health Plan will allow employees one plan election change to revoke their current group health plan election for 2020 and select another health plan option that Security Health Plan offers. Additional changes after this one-time election option are only allowed during the employer group's open enrollment period or if the employee has a qualifying life event.

If an employer decides to allow employees to make enrollment changes regarding this IRS Notice, Security Health Plan requests written confirmation from the group to allow for such changes.

COBRA Deadlines Extended for National Emergency

Due to the COVID-19 National Emergency, deadlines to take action regarding COBRA/State Continuation elections and make payments have been extended. The period of time from March 1, 2020, until sixty (60) days after the announced end of the National Emergency is the "Outbreak Period" and does not count toward the deadlines for COBRA/State Continuation election timeframes, special enrollment timeframes, as well as claim procedure and external review process timeframes. It is unknown when the national emergency will expire.

Specifically, Security Health Plan will no longer count days during the Outbreak Period towards the:

Group Health Plans

- 30-day period (or 60-day period in certain circumstances) for an individual to request enrollment in a group health plan due to a HIPAA special enrollment event;
- 60-day period for a qualified beneficiary to elect COBRA continuation coverage;
- 30-day grace period for a qualified beneficiary to pay COBRA premiums;
- 45-day period from election of COBRA continuation coverage to the date the first payment may be due;
- Deadline by which a group health plan must provide a COBRA election notice to qualified beneficiaries;
- Period within which a claimant may request an external review of a denied appeal; and
- Date by which a claimant may file information to perfect a request for external review.

COVID-19 Helpline

For **NON-SYMPTOMATIC** questions regarding COVID-19, call our helpline: **877-998-0880**.

Open 24 hours a day, 7 days a week.

Experiencing Symptoms?

Anyone experiencing symptoms of a fever, cough or shortness of breath, or concerned that they may have been exposed to COVID-19, are encouraged to call the **Marshfield Clinic Health System Nurse Line** at **1-844-342-6276**, *before visiting a doctor's office*, urgent care, hospital or emergency room.

All ERISA Plans

- Period during which claimants may file a benefit claim under the plan's claims procedure; and
- Period within which claimants may file an appeal of a claim denial.
- The effect of the joint notice is to extend all of these deadlines until after the conclusion of the Outbreak Period.

Fully Insured and Self-funded Benefit Coverage

For your **fully insured clients** covered by Security Health Plan

- Testing and testing-related services will be covered at 100%. This includes office visits, emergency room or urgent care visits associated with testing. Please note, testing is only available if the patient meets clinical criteria based on a care provider's evaluation.
- Inpatient treatment and observation of COVID-19 will be covered at 100% for most of our fully insured plans. We are working with each self-funded employer on how they wish to cover COVID-19 treatment.
- Telehealth will be covered under fully insured plans for in-network providers, subject to the members' plan cost share (deductible, coinsurance, copays).
- Care My Way is covered at 100% for fully insured plans.

Premium Billings

Premium payments are subject to our current non-payment policy.

Families First Coronavirus Response Act: Employee Paid Leave Rights

Department of Labor resource link: <https://www.dol.gov/agencies/whd/pandemic/>

- Assistance available to employers with 500 employees or less
- Provides tax credits for the cost of providing paid sick or family leave related to COVID-19
- Effective through December 31, 2020
- The link above includes eligibility, fact sheets and other resources that can help employers take advantage of this Act

Furloughs and Layoff Policies

Security Health Plan will allow for adjustments to employee eligibility and termination policies during the COVID-19 pandemic.

Each employer's employee handbook defines who is eligible for benefits. Security Health Plan will follow employers' definition of benefit-eligible employees. We will continue to follow what is in the Group Insurance Policy and employer handbook. If employers would like to make changes to their policies, we will need them to consider the following and present us with an amendment to their handbook.

Eligibility and termination guidelines during a pandemic:

- Employers are encouraged to review their benefit-eligible employee definition:
 - Full-time status with the numbers of hours required to be benefit-eligible
 - Please note Security Health will not be allowing current ineligible classes to be added for coverage without a qualifying event. COVID-19 has not been deemed a qualifying event at this time.
 - Employers may add a clause for furlough. For example:
 - During furlough with intent to reinstate, we will continue health benefits for "X" days as long as you pay your employee portion to the employer. After "X" number of days, your benefits will be

terminated and you will be eligible for COBRA, state continuation or marketplace coverage. **The period of time from March 1, 2020 until sixty (60) days after the announced end of the National Emergency is the “Outbreak Period” and will not count toward the COBRA deadline dates.** Some employees may even qualify for Medicaid in the state of Wisconsin. x = 60 days or x = 90 days.

- Termination coverage:
 - During layoff without intent to rehire, employers may change the policy to extend the coverage beyond what they currently offer. If employers choose to extend coverage for “X” number of days, upon expiration of benefits a COBRA, State Continuation or SEP for Marketplace coverage would begin. **The period of time from March 1, 2020 until sixty (60) days after the announced end of the National Emergency is the “Outbreak Period” and will not count toward the COBRA deadline dates.**
 - Rehires
 - Employers may add a clause for rehires if they choose to waive the standard benefit-eligibility waiting period for a rehired employee who was terminated due to COVID-19.
- Please note, a change to your benefit-eligible employee definition will not allow non-covered employees to enroll on your plan unless they have a qualifying event.

Employee Premium Payment During Leave

If eligibility is maintained during a furlough, the employer may collect the employee’s share of premium to maintain coverage during leave of absence.

Premiums may be collected in one of the following manners:

- **Catch-up:** Employer delay employee’s premiums until they return to work. Upon return, the employer starts deducting additional premium to catch up. There are limitations on how much can be deducted from a paycheck at one time. A problem with this method is if an employee does not return after leave, collecting their share of premiums may be difficult or impossible. Consult your legal or HR advisor for additional guidance.
- **Pre-pay:** If you are aware of a planned absence, an employer may pre-collect premiums prior to the leave. If the leave is anticipated to span more than one plan year, the employer cannot pre-collect premiums because of cafeteria rules.
- **Pay-as-you-go:** During the leave, the employer may require the employee to pay their portion of premium to maintain coverage. Premium collected is on an after-tax basis unless the leave is paid. Collecting premium on a monthly basis is best practice.

Patient Care at Marshfield Clinic Health System

Appointments are being made for in-person or telehealth appointments as appropriate for each patient’s care needs.

If your clients are experiencing symptoms of a fever, cough or shortness of breath, or are concerned that you may have been exposed to COVID-19, please call the **Marshfield Clinic Health System Nurse Line** at **1-844-342-6276 (or 1-800-549-3174 for Security Health Plan members)**, **before visiting a doctor’s office**, urgent care, hospital or emergency room.

Telehealth available from multiple providers

Many providers are beginning to reschedule previously delayed appointments. They are also offering telehealth services.

- **What is telehealth?**

- Telehealth is an appointment with a health care provider done virtually. These appointments are conducted over a secure two-way interactive video connection or telephonically.
- Learn more about telehealth from the Marshfield Clinic Health System at www.marshfieldclinic.org/services/telehealth
- Security Health Plan members may be able to have a doctor visit using telehealth technology. Any services that are covered by Security Health Plan will be covered if done via a virtual visit for any members of Security Health Plan.
- Members are advised to contact their provider's office to ask if a telehealth appointment is available.
- Care My Way virtual visits continue to be offered for free to most Security Health Plan members.

Marshfield Clinic Health System

COVID-19 Services from Occupational Health/Business Health Solutions Services

Marshfield Clinic Health System Occupational Health and Security Health Plan Business Health Solutions teams are offering a full range of on-site and consultative services to help create safer worksites during the ongoing COVID-19 situation. Services include:

- COVID Screening Service – Onsite employee temperature checks and COVID-19 symptom screening
- COVID virus testing service – Onsite administering of specimen collection; test processing
- Marshfield Clinic Health System COVID Compliance Seal of Approval: implementation of all recommendations from Badger Bounce Back and other state and federal regulations (WI-DHS, OSHA, CDC, etc.)
- Employee isolation guidance and workplace contact tracing for COVID-positive employees
- Return-to-work programs for employees who were isolated (positive or suspected positive)
- Medical advisory services to help you understand an employee's health information (treatment, procedures, accommodations and limitations)
- Training on:
 - Proper PPE use and storage
 - Proper social distancing practices
 - Sanitation methods to maintain clean work environments
 - Virus transmission truths/myths
 - What does virus testing vs. antibody testing mean for your business
- Access to dedicated Occupational Health email address to ask questions of the experts
- Antibody/serological testing when it becomes more widely available

We are also taking precautionary measures with our continued **Marshfield Clinic Health System occupational health, wellness and onsite care programs:**

We will continue to see employees at Marshfield Clinic Health System clinics for:

1. Audiometry, hearing conversation programs
2. DOT drug screens
3. Respirator fit testing, PFTs, and medical clearance
4. Mine Safety Health Act physicals (pre-placement, monitoring, and termination physicals), police pre-placement, Occupational Safety and Health Administration required medical surveillance program physicals (pre-placement, monitoring, and termination physicals)
5. Certified Driver Medical Examinations
6. Initial Worker's Compensation visits
7. Worker's Compensation follow-ups for those currently off work

8. MCHS employees and volunteer Occupational Health services (considered onsite)
9. Employer requested drug screens mandated by employer policy and not Federal or State law
10. Worker's Compensation follow-up for those returned to work with restrictions
11. Pre-placement exams not under a federally regulated program
12. Certain onsite wellness programs

We will work with employers to determine if they need onsite services continued at their facilities during this time.

We are postponing new requests for Care My Way @ Work demonstrations and installations until the public health emergency is completed.

The COVID-19 pandemic is a fluid situation; policies and information are changing quickly as we work together to address the health and safety of our communities. Information provided in this document is accurate as of December 29, 2020. Please see our website for the most recent updates: <https://www.securityhealth.org/covid19>.

We will continue to do our best at reaching out to our partners and our clients as changes are made.