

COVID-19 Actively-at-Work Provision Modification

CalCPA Health has implemented modifications to the actively-at-work provision to address the current environment of the COVID-19 pandemic. This is a complicated subject and difficult to provide every possible scenario in this brief. Please contact us if your situation is not detailed here or to verify how to handle your specific situation with regards to furloughs, layoffs, reduced work hours or similar employment status.

ACTIVELY-AT-WORK PROVISION

Actively-at-Work Provision, in part, means: “The Group Insurance Trust requires that employees must be employed by the firm on a permanent basis, with wages subject to withholding that are reported on a W-2 form. Such employees are eligible to enroll if they are actively at work at least 20 hours per week. However, the employer may elect to offer benefits only to those employees working 30 or more hours per week.”

- Employees who do not meet the actively at work criteria after September 30, 2020 need to have their active status changed.
- If an employee is non-active (laid-off, terminated) they have COBRA continuation benefits and coverage available through Covered California – *no one will lose medical coverage.*
- Important Note: Firms should consider how to handle employees who do not have a current salary to deduct the employee’s premium contribution from.

PROVISION MODIFICATION

CalCPA Health will waive the actively-at work provision through September 30, 2020 subject to the following:

- Employees who were enrolled and eligible during the months of March through September 2020, but do not meet the actively at work provisions due to being furloughed, having hours reduced, layoff, or similar, may remain actively enrolled in the plan through September 30, 2020; provided the monthly premium is paid.
- Employers must offer to continue coverage on a uniform, nondiscriminatory basis to all employees and employee premium contributions must be the same or less as prior to the event.