SPECIALTY

How will UnitedHealthcare address employees’ Group Financial Protection coverage if, as a result of the COVID-19 national emergency, an employer makes the decision to reduce hours or implement (a) unpaid non-medical leaves of absence, (b) temporary layoffs or (c) furloughs? New 4/6

A. UnitedHealthcare understands our customers may unexpectedly need to make employment staffing decisions as a result of the COVID-19 national emergency including reducing hours or through implementing (a) unpaid non-medical leaves of absence, (b) temporary layoffs or (c) furloughs. To support our customers during this difficult time, we will continue coverage for your employees who fall below the minimum hours required by the applicable Financial Protection policy (Life, Short Term Disability, Long Term Disability, Critical Illness, Accident Protection, Hospital Indemnity) for the period of March 1, 2020, thru May 31, 2020, subject to the continued payment of premium based on hours worked prior to the staffing change related to COVID-19.

If your group policy allows for continued coverage beyond May 31, 2020, as a result of any of the circumstances outlined above, we will honor the longer period.

For employees who are impacted by a reduction in hours or the implementation of (a) unpaid non-medical leaves of absence, (b) temporary layoffs or (c) furloughs, what happens to their UnitedHealthcare Financial Protection coverage if they are not able to resume active employment as defined by the applicable policy on or before May 31, 2020? New 4/6

If impacted employees do not resume active employment on or before May 31, 2020, and their coverage is not extended further under the terms of the applicable Group Financial Protection policy, their coverage will lapse. However, if any of these impacted employees are rehired and return to active work within 12 months following their lapse in coverage, they will:

- not have to satisfy a new employee waiting period or waiting period for the pre-existing provision if these were satisfied before the COVID-19 staffing reductions; and
- not have to provide evidence of insurability to reinstate the coverage they had in effect before the COVID-19 staffing reductions were implemented.

If an impacted employee had not satisfied the necessary waiting period to be eligible for coverage under the policy prior to the COVID-19 staffing reductions, credit will be given for the time previously worked, but the time spent without insurance will not be applied to this waiting period.

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Last updated 4/7/2020
When UnitedHealthcare is assuming coverage from another carrier, will the employees who, as a result of the COVID-19 national emergency experience a reduction in hours, are temporarily laid off, are on an unpaid medical leave of absence or are furloughed at the time of takeover, be eligible for coverage? New 4/6

We have decided to temporarily extend continuity of coverage for employees who have reduced hours, are temporality laid off or are on an unpaid non-medical leave of absence or are furloughed due to COVID-19. This applies to staffing changes occurring on or after March 1, 2020 and applies to plan effective dates through May 31, 2020. Premiums must be paid based on wages and benefits prior to the COVID-19 staffing changes.

Will you accept something other than a Certified Death Certificate as proof of death when administering life insurance claims? New 4/6

In order to consider a life insurance claim complete, we require claim forms from the employer and beneficiary as well as a Certified Death Certificate. We do appreciate, however, that in this current pandemic the ability to obtain a Certified Death Certificate may be significantly delayed. In consideration of this, for the administration of basic and supplemental life insurance claims only, we may accept other forms of documentation from beneficiaries; this will be assessed on a case by case basis.

Please note, the administration of Accidental Death and Dismemberment claims will require a Certified Death Certificate with a final cause of death. If appropriate, based on the circumstances surrounding the death, autopsy and toxicology reports may be required as well.

What is UnitedHealthcare doing to support members in accessing dental or vision coverage? New 3/27

For our dental and vision coverage we will be supporting our members in accessing the care that they need by relaxing certain frequency limitations, when appropriate, as well as addressing in-network coverage gaps that may arise in the short-term given provider office closures.

If I am hospitalized due to COVID-19, will it be treated like any other hospitalization under our Hospital Indemnity plans?

Yes, hospitalizations due to COVID-19 will be treated like any other hospitalization under the terms our Hospital Indemnity plans.

If a covered person is medically quarantined but not yet exhibiting symptoms or formally diagnosed with COVID-19, are they disabled under a UnitedHealthcare Short Term Disability plan? 

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Last updated 4/7/2020
Short-Term Disability plans insure against lost income when a medical condition restricts or limits a covered person’s ability to perform their job and meets the policy definition of a disability.

If, as a result of COVID-19, a covered person is unable to work, experiences a loss of income due to a medically supported quarantine or isolation, but does not rise to the level of restrictions and limitations as defined in the policy, UnitedHealthcare will review and consider these claims for possible benefit payment. Generally speaking, if a reasonable accommodation for remote work exists while in quarantine or isolation, there is no loss of income; therefore, the definition of disability would not be met.

Do you count quarantine periods towards any elimination periods that apply before benefits are paid under your disability plans?
Yes.

Is documentation required in order to substantiate a medically supported period of isolation or quarantine?
Yes, proof of the medical quarantine or isolation is required from the treating provider. If a customer is having difficulty obtaining the necessary documentation to substantiate their claim, UnitedHealthcare will work with that individual based on their unique situation.

Does your standard group disability plan contain exclusions for pandemics like COVID-19?
No.

Is contracting COVID-19 considered an Accident as defined under our Accident Plans?
No, contracting COVID-19 is not considered an Accident as defined under our Accident plans.

Is COVID-19 a covered condition under our Critical Illness plans?
No, COVID-19 is not a covered Critical Illness under our Critical Illness plans.

Do our basic or supplemental life policies have any exclusions for death from a pandemic?
There are no exclusions for pandemics in our basic or supplemental life policies.

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Last updated 4/7/2020
Are employees who self-quarantine or isolate due to underlying medical conditions or risk of exposure to COVID-19 covered under FMLA?

The Family Medical Leave Act (FMLA) provides job protection for leave related to one’s own serious health condition or to care for a family member. At this time, job protection is not provided to those who self-quarantine or isolate due to underlying medical conditions or risk of exposure to COVID-19.

If an employer has elected Accommodation Services, these services are limited to people with disabilities as defined in the Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA). At this time, the protections offered under the ADA and ADAAA do not extend to individuals who self-quarantine or isolate due to underlying medical conditions or risk of exposure to COVID-19.

How did The Families First Coronavirus Response Act (HR 6201) passed by the federal government expand employee job protections under the FMLA?

The Families First Coronavirus Response Act created, on a temporary basis, one new protected leave category. Effective April 2, 2020, through December 31, 2020, if an employee is unable to work or telework because s/he needs to care for a child under the age of 18 whose school or daycare has closed as a result of COVID-19, the leave will be protected under the FMLA. The employer must provide up to 12 weeks of leave. The first 10 days of the leave will be unpaid, and the remaining leave will be paid by the employer at a rate of 2/3 the employee’s regular rate of pay. This payment shall not exceed $200/day or $10,000 for the total duration of the leave. To be eligible for this leave, the employer must have fewer than 500 employees, and the employee needing leave must have been employed for at least 30 days.

For employers who have purchased our FMLA and Leave Accommodation Services, we are prepared to administer and track any leave requests received under this new law. However, we will not, consistent with our administrative agreements, issue benefit payments to employees.

The federal government recently passed The Families First Coronavirus Response Act (HR 6201). How does this new legislation impact our Financial Protection disability plans/benefits?

The Families First Coronavirus Response Act enacted, on a temporary basis, up to two weeks of paid sick leave for employees who are unable to work or telework as a result of COVID-19. The specific reasons for permitted leave include the employee being subject to a government-ordered quarantine, advised by healthcare provider to quarantine or experiencing symptoms of COVID-19. The reasons also include the need to care for an individual who is subject to a government order or has been advised to quarantine, or needs a leave to care for a child because their school or daycare has been closed. This law is effective April 2, 2020, through December 31, 2020, and applies to private employers with fewer than 500 employees and public employers of any size.
The primary impact of this new paid sick leave law relates to potential short-term disability claims filed on the basis of a medically supported quarantine or isolation. As stated above, if, as a result of COVID-19, a covered person is unable to work or telework, experiences a loss of income due to a medically supported quarantine or isolation, but does not rise to the level of restrictions and limitations as defined in the policy, we will review and consider these claims for possible benefit payment. With the introduction of mandatory paid sick leave:

- for applicable employers with fewer than 500 employees there will be no income loss during the recommended 14-day quarantine period and no reason to file a short-term disability claim;
- for employers with more than 500 employees, our position stated above regarding consideration of STD claims in the absence of a diagnosis will not change; and
- in the event an employee is diagnosed with COVID-19 and is too ill to work, any mandatory paid sick leave received by the employee may be considered an offset under the terms of the applicable short term disability policy.

I understand how UnitedHealthcare approaches COVID-19 relative to their insured Financial Protection plans, but what about self-insured plans where UnitedHealthcare is administering disability claims on behalf of our company?

A. Generally speaking, we approach claim administration for our self-insured disability customers similar to that of our fully insured customers. That said, we recognize that each self-insured policyholder (employer) has discretion as to how benefits are paid, and we work with customers to administer benefits according to their company-specific needs. We would suggest, however, that the employer consult with its benefits advisor or legal counsel regarding such decisions.

Does coverage continue during a medically supported period of isolation or quarantine?

Many of our insurance plans allow for a continuation of coverage for approved leaves of absence. We will consider an employee to be actively employed during their medically supported isolation or quarantine if the employee is isolated or quarantined at the recommendation of their treating provider, the Centers for Disease Control and Prevention (CDC) or similar government order. The length of continuation is dependent upon how the leave of absence provision and/or termination provision is defined under the applicable coverage/plan.*

*Continuation of coverage presumes applicable premiums are paid.

What happens to my UnitedHealthcare Financial Protection coverage if my employer closes for quarantine based on a Federal or State Emergency Order?

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Last updated 4/7/2020
Your continued coverage under a UnitedHealthcare Financial Protection plan is governed by the specific policy documents between UnitedHealthcare and your employer. These policy documents typically include provisions that define active at work requirements as a prerequisite to enroll in and to retain coverage as well as continuation of coverage provisions based on either a leave of absence or layoff. The specific duration for continued coverage may vary as some customers have purchased enhanced coverage. In all cases, premiums must continue to be paid. Any claims which arise during the temporary closure will be reviewed according to the terms of the specific policy issued to your employer.

**If I lay off part of my workforce in response to the COVID-19 crisis, how long will their coverage continue under our group life, AD&D and supplemental health plans?**

Continuation of coverage due to an approved layoff is outlined in the *Termination of Covered Person Insurance* or *Termination of Covered Employee Insurance* section(s) of the employer’s policies. It may vary by customer and you should refer to the actual Certificate(s) for plan specifics.

- By way of reference, our standard policy language (which applies to most customers) allows for coverage to continue due to an approved layoff, for up to three months from the date he/she stopped active work.

**If I lay off part of my workforce in response to the COVID-19 crisis, how long will their coverage continue under our group disability plan?**

Continuation of coverage due to an approved temporary layoff is outlined in the *Termination of Covered Person Insurance* section of the employer’s disability policy. It may vary by customer and you should refer to the actual Certificate(s) for plan specifics.

- By way of reference, our standard disability policy language (which applies to most customers) allows for coverage to continue due to a temporary layoff - through the end of the month following the month in which the layoff began.
  - For example: If a temporary layoff began March 17, 2020, coverage does not end until April 30, 2020.

**If my company reduces their hours of operation or furloughs certain employees as a result of COVID-19, will my employees be able to retain their Financial Protection coverages even though their current work hours are below the minimum required by the policy?**

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Last updated 4/7/2020
A. Effective from March 1, 2020, through April 30, 2020, when our customers' business operations are impacted due solely to the COVID-19 pandemic, our Financial Protection policies will be administered as follows:

- If an employee who is normally within an eligible class as defined in the policy remains working but his/her working hours fall below the minimum required, we will consider the employee to remain in an eligible class of insurance, provided that premiums continue to be paid.

- If an employee who is normally within an eligible class as defined in the policy is temporarily furloughed and furloughs are not specifically addressed in the Certificate, we will consider the employee to be on a temporary layoff and coverage will continue as outlined in the Termination of Covered Person Insurance or Termination of Covered Employee Insurance section(s) of the employer’s applicable policies, provided premiums continue to be paid.

**How will dental and vision support the service to members and providers? Update 4/5**

For our dental and vision coverage we will be supporting our members in accessing the care that they need by relaxing certain frequency limitations, when appropriate, as well as addressing in-network coverage gaps that may arise in the short-term given provider office closures.

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