CORONAVIRUS DISEASE 2019 (COVID-19)

Temporary Extension to Enroll in Benefits for Life Events



Audience: All colleagues

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COVID-19 Response Team Owner: Planning

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Summary: Colleagues Have Additional Time to Enroll in Benefits Following Life Events

As a result of the COVID-19 National Emergency, the Department of Labor (DOL) and Internal Revenue Service (IRS) recently issued a rule mandating a temporary extension of the period to enroll in group health plans following the occurrence of a life event that is a Health Insurance Portability and Accountability Act ("HIPAA") special enrollment event, including:

- Birth of a child
- Adoption or placement for adoption of a child
- Marriage
- Loss of eligibility for other health coverage
- Loss of Medicaid or CHIP coverage or becoming eligible for a Medicaid or CHIP premium assistance subsidy
 offered by a State

The rule issued by the DOL and IRS extends the 30-day (60-day for Medicaid and CHIP events) enrollment period following a HIPAA special enrollment event by the Outbreak Period defined in the rule. The Outbreak Period began on the first day of the National Emergency, March 1, 2020, and ends 60 days after the announced end of the National Emergency (or such other date announced by the DOL and IRS in a future notification). The exact date on which the COVID-19 National Emergency will end has not been announced as of this communication. Once it is announced, we will provide an update regarding the end of the Outbreak Period.

If you are a benefit eligible colleague and had a life event listed above on or after Jan. 31, 2020, or you expect to have one in the near future, be sure to review the full article below for important information and deadlines for enrolling in benefits.

Full Article: Temporary Extension to Enroll in Benefits Following Life Events

As a result of the COVID-19 National Emergency, the Department of Labor (DOL) and Internal Revenue Service (IRS) issued a rule mandating a temporary extension of the period to enroll in the group health plans under the Trinity Health Corporation Welfare Benefit Plan ("Plan") following the occurrence of a life event that is a HIPAA special enrollment event.

In general, benefit eligible colleagues who experience a life event that is a HIPAA special enrollment event and want to enroll in benefits under the Plan must enroll no later than 30 days (60 days for Medicaid and Children's Health Insurance Program Reauthorization Act of 2009 (CHIP) events) after the event took place.

The rule issued by the DOL and IRS extends the 30-day (60 day for Medicaid and CHIP events) enrollment period following a HIPAA special enrollment event by the Outbreak Period defined in the rule. The Outbreak Period began on the first day of the National Emergency, March 1, 2020, and ends 60 days after the announced end of the National Emergency (or such other date announced by the DOL and IRS in a future notification). The exact date on which the COVID-19 National Emergency will end has not been announced as of this communication. Once it is announced, we will provide an update regarding the end of the Outbreak Period.

What the temporary extension means to colleagues experiencing life events

Benefit eligible colleagues who have one of the following HIPAA special enrollment life events on or after March 1, 2020, are eligible for an extended time to enroll in benefits* under the Plan:

- Birth of a child
- Adoption or placement for adoption of a child
- Marriage
- Loss of eligibility for other health coverage
- Loss of Medicaid or CHIP coverage or becoming eligible for a Medicaid or CHIP premium assistance subsidy offered by a State

*Although the DOL and IRS rule only requires an extended period to enroll in a medical/prescription drug plan under the Plan, Trinity Health is permitting an extended period to enroll in all benefits under the Plan.

Examples:

Assuming the COVID-19 National Emergency is March 1, 2020 – July 30, 2020, the Outbreak Period is March 1, 2020 – Sept. 29, 2020.

Colleague A had a newborn child on April 1, 2020, which is during the Outbreak Period. Colleagues generally have 30 days from the date of the birth of a child to enroll the newborn in benefits under the Plan. Under the temporary DOL and IRS rule, the colleague has until 30 days after the end of Outbreak Period to enroll in benefits under the Plan which extends the end of the colleague's enrollment period from April 30 to Oct, 29 (Sept. 29 + original 30-day enrollment period).

Colleague B had a newborn child on Feb. 15, 2020. The normal 30-day enrollment period ends during the Outbreak Period. Under the temporary DOL and IRS rule, because there were 15 days between the date of the birth and March 1 (the beginning of the Outbreak Period), the colleague has until 15 days after the end of Outbreak Period to enroll in benefits under the Plan which extends the end of the colleague's enrollment period from March 16 to Oct. 14 (Sept. 29 + the remaining 15 days of the original 30-day enrollment period).

What's Next?

If you had a life event on or after Jan. 31, 2020 - July 5, 2020

• If you are a benefit eligible colleague and had a HIPAA special enrollment life event listed above on or after Jan. 31, 2020, and either you did not attempt to enroll in benefits under the Plan because you missed the normal 30-day enrollment period (60-day for Medicaid and CHIP events), or you attempted to enroll after the normal 30-day



enrollment period (60-day for Medicaid and CHIP events) and your request to enroll was denied, we encourage you to contact HR for assistance with enrollment.

 Log onto <u>HR4U</u> at <u>https://hr4u.trinity-health.org</u>. Scroll to the bottom right of the home page and click on Ask HR4U to open a request for assistance to enroll. *Note: Colleagues at Mercy Chicago and ministries in Connecticut, Massachusetts, New York are not yet using HR4U and should contact their local Benefit Representative for assistance.* HR will review your request to determine if you are eligible for the enrollment period extension under the DOL and IRS temporary rule.

If you have a life event on or after July 6, 2020

- If you are a benefit eligible colleague and you have a HIPAA special enrollment life event listed above on or after the date of this communication and you want to enroll in benefits under the Plan, please enroll within 30 days of the event through <u>Workday</u>.
- If you do not enroll within 30 days of the event, you may log onto <u>HR4U</u> at <u>https://hr4u.trinity-health.org</u>. Scroll to the bottom right of the home page and click on Ask HR4U to open a request for assistance to enroll. *Note:* Colleagues at Mercy Chicago and ministries in Connecticut, Massachusetts, New York are not yet using HR4U and should contact their local Benefit Representative for assistance. HR will review your request to determine if you are eligible for the enrollment period extension under the DOL and IRS temporary rule.

More Information

You may view the full Summary of Material Modifications regarding COVID-19 related changes to the Plan here.

