

MBA GROUP INSURANCE

- TO: Banks Participating under the Group Insurance Plans
- FROM: Group Insurance Department
- DATE: March 26, 2020
- RE: Coverage Continuation

We realize this is an unprecedented time we live in. Your bank may participate in any of our group insurance plans (including Life, Dental, Disability, and Vision). Voya is our carrier for Life and Disability and we are applying their new coverage continuation policy for Life and Disability to also include Dental and Vision. Rest assured, continuation of employee benefits will continue for furloughed employees.

We thought it would be important to include the statement from Voya so you can see the exact language they have provided. If your bank does not participate in Short Term or Long Term Disability through the MBA, you may ignore the section referencing "Disability."

<u>FURLOUGH</u>

Q: Will Voya allow continuation of coverage for Life, Disability and Supplemental Health Benefits during an employee's furlough (temporary layoff)/ (leave of absence)/ (temporary reduction in hours)?

A: For an employee's furlough (temporary layoff)/leave of absence/temporary reduction in hours due to circumstances related to COVID-19, Voya will administratively extend a period of continuation for all impacted employees on all inforce Voya Group Life, Disability and Supplemental Health insurance coverages to the earlier of:

- 60 days or
- the end of the period when an employee
 - is unable to work,
 - o is working reduced hours, or
 - o is not working from their usual work location

Due to the unique circumstances resulting from the COVID-19 pandemic, Voya is applying this administrative exception to all inforce policies without requiring individual amendments or contract changes. Furloughed employees will be treated as if they are on an approved leave of absence even if the Certificate does not explicitly note furlough as an approved leave. The furloughed employees will remain eligible under the policy pursuant to the terms described herein. Premium payment is still

required, subject to the policy's premium grace period. This administrative exception is being applied uniformly at the employer level.

For Disability Insurance where the benefit is dependent upon earnings:

- For a furlough or leave of absence, Voya will utilize the higher of the employee's gross salary or wages on the last day of Active Work before the furlough or leave began.
- For a temporary reduction in hours, Voya will utilize the higher of the employee's most recent gross salary or wages before the reduction in hours began.

For Life and Supplemental Health Insurance, Voya will utilize the amount of insurance in effect on the employee on the last day of Active Work before the furlough (temporary layoff)/leave of absence/temporary reduction in hours.

If an eligible claim occurs while coverage is continued, the benefits will be payable in accordance with the Policy and Certificate.

Voya will provide the administrative extension of the continuation timeframe until it determines the accommodation is no longer necessary. Voya will continue to monitor the current situation and will provide additional guidance as it becomes available.

DISABILITY INCOME INSURANCE – GENERAL

Q: If an employee is pending an extension of their leave or disability claim, but is unable to visit their doctor due to quarantine, how is this handled?

A: We are practicing reason and applying appropriate leniency for extension of benefits when a doctor visits are delayed due to COVID-19 precautions.

Q: How do my employees report a leave or disability? What type of documentation will be required from the employee or the employee's healthcare provider?

A: As with all claims, we rely on the submitted claim forms and medical data and/or a physician's medical certification to determine eligibility on a case-by-case basis. We are practicing reason and applying appropriate leniency for allowing additional time for submission of claim documentation.

Q: If an employee is experiencing symptoms and sees a telemedicine provider, will you require a confirmed diagnosis of COVID-19 to process benefit's claims?

A: We rely on medical data and/or a physician's medical certification to determine eligibility on a caseby-case basis. Eligibility is dependent upon the contract/policy language, including the Policy/Certificate's definition of disability. We will evaluate suspected cases of COVID-19 the same as any other medical condition to determine if the severity of symptoms precludes the individual from performing his/her occupational duties. Thank you for supporting the group insurance products and your patience as we work through this challenging time.

Stacy Meyer: <u>stacym@minnbankers.com</u> Barb Markus: <u>barbaram@minnbankers.com</u> Connie Mack: <u>conniem@minnbankers.com</u>

Minnesota Bankers Association 8050 Washington Avenue South, Suite 150 Eden Prairie, MN 55344 Phone 952-835-3900 * MN Toll Free 866-835-3900 * Fax 952-896-1100 mba@minnbankers.com * www.minnbankers.com

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