

Cigna Group Insurance (CGI) FAQs

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New or updated FAQs

Updated: Can you help me understand the Families First Coronavirus Response Act (FFCRA) and the implications for employers?

Earlier this year, the Families First Coronavirus Response Act (FFCRA) was enacted in response to the COVID-19 pandemic. Related regulations were subsequently issued by the Department of Labor (DOL). On August 3, 2020, a New York federal judge vacated certain provisions of the DOL's FFCRA rules. We've highlighted the key things employers should know and also included a link to our updated FAQ.

As a reminder, this legislation only impacts employers with less than 500 employees and public agencies, as defined by the FMLA.

Coverage and policy questions

The Departments of Labor (DOL) and Treasury (DOT) recently released final guidance regarding the extension of specific timeframes related to benefit plans and COBRA. How does this impact our employees' coverage with Cigna Group Insurance?

While the DOL Notice is mostly applicable to group health plans and COBRA, there are two items that apply to life, accident or disability insurance. Cigna will comply with the requirements under this Notice:

- The date within which individuals may file a benefit claim under the plan's claims procedure pursuant to 29 CFR 2560.503-1,
- The date within which claimants may file an appeal of an adverse benefit determination under the plan's claims procedure pursuant to 29 CFR 2560.503-1(h)

We will be reviewing any claims that have been denied for late submission during the applicable timeframe and will take corrective action where appropriate to ensure compliance with the Notice. It should be noted that denials of this type are very rare and that, in addition to disregarding days required by the Notice, we will continue to use reasonableness as the standard to evaluate them.

How is Cigna Group Insurance addressing eligibility for employees who have been furloughed, temporarily laid off, or had their hours reduced?

Individuals who were members of an eligible class under a Cigna Group Insurance policy on March 1, 2020 and were subsequently furloughed, temporarily laid off or had their hours reduced as the result of business decisions relating to COVID-19 will remain eligible until August 31, 2020 provided they remain employed and premiums continue to be paid. Any such time will also be taken into consideration toward the satisfaction of any Eligibility Waiting Period and will not otherwise prevent coverage from becoming effective.

For individuals hired between March 1, 2020 and August 31, 2020 who were subsequently furloughed, temporarily laid off or had their hours reduced as the result of business decisions relating to COVID-19, any such time will also be taken into consideration toward the satisfaction of any applicable Eligibility Waiting Period provided they remain employed and premiums continue to be paid and will not otherwise prevent coverage from becoming effective.

For all other information, such as when coverage would otherwise terminate, please refer to the applicable policy for additional information.

This is applicable for these Cigna Group Insurance policies: Life, Accidental Death & Dismemberment, Disability, Accidental Injury, Critical Illness, and Hospital Care.

If you have any questions related to the eligibility extension date, please contact your Cigna Group Insurance Account Executive.

What earnings will be used for employees who are furloughed or have a loss in hours?

Any resultant decrease in compensation during this period will not impact any benefit amount. We will base earnings off of the policy's definition and apply to the time period prior to the furlough, temporary layoff or reduced hours.

Are employees on unpaid leave due to COVID-19 eligible for coverage when the client moves to Cigna?

Our policies contain a Takeover provision which addresses this (so long as they were covered under the prior plan on the day before our policy effective date). The coverage is essentially offered on a "no loss/no gain" basis.

At the end of a furlough period, will employees be able to port or convert their coverage?

Employers will need to refer to the policy for details concerning when coverage terminates, any available conversion or portability options and any corresponding time frames.

Will temporarily converted facilities qualify as a hospital (Schools, Churches, etc.) as it pertains to Hospital Care claim coverage?

Yes. During this COVID-19 outbreak, we have relaxed our guidelines to allow our hospital definition to include any temporary licensed or regulated facility that is acting as an overflow facility for a hospital. Customers would still need to meet the policy guidelines of being admitted inpatient, or meet our standard Observation benefit guidelines in order to qualify for a benefit. We will continue to closely monitor the situation, and will continually review our position to ensure that it meets industry needs.

Can Cigna help me track absence connected to COVID-19 quarantine?

If Cigna is administering Federal and/or State Family and Medical Leave on your behalf and your employee(s) are eligible and approved for a leave of absence under the Family and Medical Leave Act (FMLA), we will administer the leave per the terms and conditions of our agreement.

Please note, we will administer leaves for our clients (employers with under 500 employees and all public agencies) that are covered under the Families First Coronavirus Response Act. Private employers with over 500 lives are not covered under this expansion and should not designate a leave that does not qualify for FMLA as an FMLA leave, since employees are limited to 12 weeks of FMLA in any 12-month period.

What is Cigna Group Insurance doing to accommodate insurance applications pending due to medical underwriting delays?

There may be a delay in the processing of individual applications for insurance which require medical underwriting. This is due to temporary difficulties in obtaining paramedical examinations or medical records. To address this, we are re-reviewing all pending applications to determine whether a determination can be made based on the information currently on file. If not, we are exploring alternative sources of medical information and reaching out to applicants with specific, targeted medical questions to expedite processing.

How and when would a COVID-19 diagnosis constitute a disability?

Symptoms consistent with COVID-19 and/or a positive COVID-19 test will be evaluated against the terms and conditions of your Cigna disability policy or plan as they would any other confirmed sickness. We will work closely with our customers, clients, providers, and clinical resource team to obtain the information necessary to make a determination. State disability, paid sick leave and/or family medical leave protection plans may have varying definitions for 'disability.'

Can Cigna Group Insurance provide guidance on revising self-funded Short Term Disability programs in light of this pandemic?

Yes. We are recommending that your plans be preserved to ensure all employees and conditions are handled consistently.

We have received many requests to fundamentally change plans for clients that have self-funded Short Term Disability (STD) programs with us. The most frequent requests include:

- Waiving the elimination period for COVID-19 diagnosis;
- Paying STD benefits for a period of quarantine for suspected exposure or actual COVID-19 diagnosis without symptoms;
- Increasing the amount of pay for employees out of work due to quarantine, suspected exposure or actual disability related to COVID-19; and
- Paying longer periods of time than may be medically necessary.
- Paying STD benefits for employees who test positive for COVID-19, but are asymptomatic

We recommend that your disability plans be preserved and we have outlined the following suggestions if you want to extend additional benefits and support to your employees during this time:

- Continue to look for opportunities for employees who test positive for COVID-19, but are not disabled or symptomatic, to work from home.
- In the event that working at home is not an option and your company has decided to
 provide pay for a period of quarantine, handle that through your normal payroll practices.
 This eliminates the need to file claims and generally reduces the timeframe for an
 employee to get paid.
- In the event that an employee is disabled as a result of COVID-19 (and we have approved the claim) and your company has decided to not require an elimination period be satisfied, we recommend providing payment for that time (typically 7 days) through payroll. This will eliminate special handling requests and errors for non-related COVID-19 issues as well as permit you to take any additional steps to ensure your workplace is safe for said employee's co-workers.
- Should you choose to provide benefits over and above what your plan may provide, our
 guidance again is to handle that as a function of payroll versus modifying or adjusting your
 plan for this one specific condition/situation. This should help avoid the risk associated
 with permitting different benefits to be paid for this condition versus others (e.g., cancer,
 etc.).

Will Cigna accommodate an employer's decision to approve benefit payments if clients have a self-funded Short Term Disability plan?

We are unable to deviate from our contractual agreement; however, we will work closely with our clients, customers, providers and clinical resources to gather all information necessary to ensure we have a holistic view of our customers' restrictions and limitations and all supporting documentation necessary to make an accurate claim determination.

We have experienced the loss of an employee due to COVID-19. Does Cigna cover this loss?

Cigna Life Insurance helps provide families with additional financial resources should a covered person pass away prematurely. In the unfortunate event that a covered person were to pass away as a result of contracting COVID-19, Life Policy benefits would apply. Individuals can file a life claim by calling Cigna at 888.842.4462 or 866.562.8421 (español), 7:00 am-7:00 pm CDT or submitting a claim online: Cigna.com/customer-forms. Fax, email and postal options are also available, if needed.

Federal and state leave and disability legislation

Can Cigna help employers understand the EEOC guidance for the Americans with Disabilities Act (ADA) as worksites begin reopening?

The Equal Employment Opportunity Commission (EEOC) enforces workplace anti-discrimination laws, including the Americans with Disabilities Act (ADA), and including the requirement for reasonable accommodation and rules about medical examinations and inquiries.

As worksites begin to reopen, these laws continue to apply; however, they do not prevent an employer from the following guidelines suggested by the CDC about steps employers should take regarding COVID-19. We have put together a list of <u>commonly asked questions and answers</u> from the EEOC on what to consider as your employees return to the worksite. You can also read the <u>full guidance</u> on the EEOC website.

What resources do you have to help employers understand the evolving legislative changes being made to federal and state leave and disability plans?

Listen to our new <u>podcast</u> and hear from Cigna Group Insurance leaders as they discuss these new laws and share tips on how employers can remain compliant amidst this fast-moving legislative environment.

In addition, we continue to track federal and statutory legislation to determine revisions to our <u>Federal and Statutory Leave and Disability Plan Reference Guide</u>. Please continue to visit <u>Cigna's COVID-19 Employer Resource Center</u> for regular updates.

What is the new Coronavirus Aid, Relief and Economic Security (CARES) Act?

On March 27, 2020, President Trump signed the Coronavirus Aid, Relief and Economic Security (CARES) Act into law. The \$2 trillion package provides economic relief to individuals, health care providers, small businesses, and heavily affected sectors of the economy, and is intended to strengthen the federal government and health care system's response to the COVID-19 pandemic. You can find out more information here.

Are stimulus checks received under CARES an offset for STD and LTD benefits?

No, the stimulus checks are not considered income.

Can you help me understand the new law passed in the state of New Jersey regarding COVID-19?

We have put together a summary document with FAQs to answer questions related to the legislation passed in the state of New Jersey. Please <u>click here</u> to read more.

Can you help me understand the new law passed in the state of New York regarding Emergency Paid Leave and Paid Sick Leave for COVID-19?

We have put together a summary document with FAQs to answer questions related to the legislation passed in the state of New York. Please <u>click here</u> to read more.

Can an employer require employees to stay home? If employees are unable to complete their job functions from home, are employers required to provide paid leave?

Employers should follow recommendations established by local law enforcement and health agencies. Helpful guidance has been provided by Centers for Disease Control and Prevention, which can be found on the "Interim Guidance for Businesses and Employers" page of CDC.gov.

State paid sick leave and/or family medical leave protection may be available in these situations. Eligibility requirements vary by state and Cigna has developed Federal and Statutory Leave and Disability Plan Reference Guide to provide state-by-state updates for you. Your Cigna team serves as your consultative partners where we are able to provide appropriate guidance and direction. With respect to company-sponsored paid leaves and questions pertaining to eligibility and

duration, we must defer questions related to these plans to our clients to make the appropriate determinations consistent with their plans and policies.

Would an employee be considered eligible for a leave (paid or unpaid) under a federal program if local health departments or law enforcement agencies require business closures or require employees to stay home under guarantine?

Congress passed, and President Trump signed into law, an expansion of the Family and Medical Leave Act of 1993 (FMLA). <u>Public agencies and employers with under 500 employees</u> may be required to provide employees paid leave if the employee is unable to work or telework because quarantine, self-quarantine, symptoms, care of family member, school closure, etc. Monetary limits are \$200 per day/\$10,000 in the aggregate.

In addition, individuals who are quarantined or are caring for family members who are quarantined as a result of a possible COVID-19 infection may be eligible for leave under the Family and Medical Leave Act (FMLA) of 1993 if the reason qualified as a "serious health condition," which includes a period of incapacity of more than three consecutive, full calendar days, and the condition involves treatment by a health care provider.

Will Cigna accommodate an employer's decision to approve Family Medical Leave (FMLA) during employer-initiated quarantines?

Employers should not designate a leave that does not qualify for FMLA as an FMLA leave, as an employee is limited to 12 weeks of FMLA in any 12-month period. If an employer improperly designates a non-FMLA leave as FMLA qualifying, the employer may interfere with the employee's right to take 12 weeks of true, qualifying, FMLA leave within the same 12-month period.

The Department of Labor has issued additional guidance in this regard: https://www.dol.gov/agencies/whd/fmla/pandemic

Would an employee be considered eligible for a leave (paid or unpaid) under a state program if business closures or quarantines require employees to stay home?

Cigna is tracking statutory legislation to determine revisions to their disability plans. Cigna is reviewing states that normally don't have state disability plans but may initiate a special program due to COVID-19. As this is a rapidly changing situation, we are working to update our <u>Federal and Statutory Leave and Disability Plan Reference Guide on</u> a regular basis. Please check <u>Cigna's COVID-19 Employer Resource Center</u> for regular updates.

Claim and leave process questions

Will an employee on disability leave be permitted to return to work without a release from their provider?

At Cigna, the health and safe return to work of your employees is a top priority. Cigna's approach to confirming a return-to-work release for our customers who have been disabled has not materially changed due to the COVID-19 pandemic. Due to the inability for some employees to find care, or to be able to visit a physician in person, Cigna will accept a return-to-work release from a provider without the customer being physically examined.

Will Cigna offer provisional approval of insured Long Term Disability (LTD) claims without customary medical documentation?

If a customer is unable to provide medical documentation to extend their claim, we will work with the customer to provide additional time based on their unique situation. Our experience thus far has shown that this approach is working for our clients and customers. A majority of claims are well-established by the time they reach the STD-LTD transition date and in situations where we need more information, we are using new methods - such as peer physician reviews and telemedicine - to aid our decision-making.

What is Cigna Group Insurance doing to update disability claim and leave processes to accommodate customers during this unprecedented time?

Please note, these updates apply to both fully-insured and self-funded business (FI and ASO):

- We've assembled dedicated COVID-19 resources to manage leaves and claims for your employees. This team will be equipped with focused training to manage evolving federal and state legislation related to COVID-19, as well as special handling processes for these claims.
 - These specialty resources will sit within each of our claims teams to ensure early engagement on COVID-19 disability claims and leaves of absence.
 - They will be briefed daily on any changes in medical guidance, federal and/or state regulatory changes, and any other updates impacting disability claim and leave management.
 - Our clients' current claim contacts will not change; however, you may see additional claims managers supporting your account in order to ensure appropriate service levels for other diagnoses.
- Cigna will provide a 14-day approval on Short Term Disability (STD) claims with a verbal confirmation of symptoms and treatment of COVID-19 from the customer. *Please note, your standard elimination period and other plan provisions will still apply. The 14-day approval period starts on the date of disability.*
- Cigna's standard STD claim process includes fast-tracking of claims with known trends and outcomes. COVID-19 claims will be included to expedite claim decision and payment timeframes.
- If a customer is unable to provide medical documentation to extend their claim, Cigna will work with the customer to provide additional time based on their unique situation. When more medical documentation is needed to support long term claim extensions, we are using new methods, such as peer physician reviews and telemedicine reports, to ensure there is no delay in decision-making.
- Cigna's claims managers will work directly with customers and their employers to identify
 opportunities for them to work from home during their recovery from COVID-19.
- If Cigna is managing leave and disability for a client, Cigna will identify the most appropriate option based on their circumstances. For example, if a customer is quarantined and does not meet the definition of disability, but would be covered by federal, state, or pre-established company leave programs, we will advise the customer of the coverage and manage the absence in accordance with those plan rules.

Is there an impact to Cigna's non-COVID-19 related claim and leave management processes and procedures as a result of the pandemic related claims?

No. From the first signs of the COVID-19 outbreak, we have worked diligently behind the scenes to ensure our teams remain strong and prepared to continue assisting all of our clients' and customers' needs regardless of product or diagnosis type. Our advanced preparations have positioned us to react quickly to the evolving situation, identify COVID-19-specific challenges and solutions, and maintain appropriate service levels for our customers dealing with other leave reasons/disability diagnoses. We understand this pandemic impacts all individuals' ability to see their providers as planned and retrieve medical records necessary for claim approvals and extensions. We are committed to work closely with our customers, clients, providers, and our clinical resource team to obtain the information necessary to make claim a determination. In situations where we need more medical documentation to continue supporting evidence of a disabling condition, we are using new methods, such as peer physician reviews and telemedicine reports, to ensure there is no delay in decision-making.

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How do my employees report a leave or disability to Cigna?

We strongly recommend that employees report their leave or disability online: www.Cigna.com/customer-forms or www.mycigna.com. This is the most effective means to report an event as call volume increases. Employees may also report an event by phone at 888.842.4462 or 866.562.8421 (español), 7:00 am-7:00 pm CDT and a representative will walk them through the process.

How can my employee file a Hospital Care claim if they are hospitalized for COVID-19?

Inpatient hospitalization resulting from COVID-19, whether for treatment or a medical-necessary quarantine, is covered just like any other illness that results in hospitalization under the Hospital Care (Indemnity) plans. In these circumstances, benefits could be payable under our hospital indemnity plan, assuming all policy provisions are met. To file a claim, employees (or a representative of the employee) may call 800.754.3207 between 7:00 am-7:00 pm CDT and a representative will walk them through the process.

My employee is unable to deposit their disability paycheck due to quarantine. Can Cigna help?

Yes. Cigna offers electronic funds transfer (EFT) for Short Term Disability payments on approved claims. This will help get faster payments to employees to minimize any financial disruption. To sign up for EFT, employees can register on mycigna.com and set up their payment preferences. In addition, Cigna can work with your employee if a change in address is needed to accommodate payment delivery.

Cigna's business continuity plans

What advance preparations Cigna is taking specific to COVID-19 to ensure business continuity?

Cigna remains committed to ongoing business continuity planning to better protect our employees and serve our customers and plan participants during an emergency situation. Currently, we are:

- Leveraging Cigna's medical staff to provide employees, including our clinical staff, with updated information on the outbreak, symptoms, and appropriate next steps
- Providing ongoing communication to our employees globally, including the symptoms, items
 for consideration, talking points for both customer service representatives and account
 managers, manager guidance, employee FAQs, and protocols for self-reporting
- Distributing supplies to Cigna offices and employees, as needed
- Increasing cleaning and sanitization services within our office spaces and enhanced food preparation safety in employee cafeteria kitchens
- Implementing work at home capabilities for our workforce
- Implementing applicable travel restrictions for non-essential business
- Your claim team will remain the same, but you may see additional claim managers assigned to your accounts in order to ensure appropriate levels of support

General COVID-19 education

How is COVID-19 transmitted?

Most often, spread from person-to-person happens mainly via respiratory droplets produced when an infected person coughs or sneezes, similar to how influenza spreads. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.¹

What are the symptoms of COVID-19?

The main symptoms of COVID-19 resemble those of a bad cold or the flu, which can make detection difficult. They include: fever, cough, or shortness of breath. The Center for Disease Control and Prevention (CDC) believes that symptoms of COVID-19 may appear in as few as 2 days or as long as 14 after exposure at this time.

Who is at risk for infection?

Different parts of the U.S. are experiencing various levels of COVID-19 activity, but <u>states</u> where community spread is occurring there is an increased and accelerated risk. The CDC expects that widespread transmission of COVID-19 in the U.S. will occur. In the coming months, most of the U.S. population will be exposed to this virus.

You are more at **risk for exposure** if you:

- Live in a place where ongoing community spread is occurring
- Have had contact with persons with COVID-19
- Have returned from traveling to affected <u>international locations</u>
- Are a health care worker caring for patients with COVID-19

You are more at risk for severe illness if you are:

- An older adult
- Have a serious chronic medical condition like:
 - Heart disease
 - o Diabetes
 - Lung disease

How can I protect myself and my staff?

There is currently no vaccine to prevent COVID-19. The best way to prevent infection is to avoid exposure. The World Health Organization (WHO) recommends everyday preventive actions to help prevent the spread of respiratory viruses. You can read their advice to the public here.

For employers with locations impacted by COVID-19, what is recommended to protect staff on site?

Cigna advises employers to take the advice of their local health authorities and organizations including the World Health Organization and the CDC. We also recommend ensuring that hand washing facilities and sanitizing hand gels are available.

What is the current risk in the U.S.?

This is an evolving situation. Visit the CDC web site for more information. You are encouraged to follow the guidance provided by local health authorities, the <u>World Health Organization</u> and <u>U.S. Centers for Disease Control and Prevention</u>.

¹ Center for Disease Control and Prevention (CDC), https://www.cdc.gov/coronavirus/2019-ncov/index.html, March 2, 2020. 937768. 08/20 © 2020 Cigna. All Cigna products and services are provided exclusively by or through operating subsidiaries of Cigna Corporation. Some content provided under license. The Cigna name logo, and other Cigna marks are owned by Cigna Intellectual Property, Inc.

Additional resources

Can Cigna help provide guidance on considerations to keep in mind as employers prepare to bring employees back to the worksite?

There are many variables you'll need to take into consideration such as local, state, and federal guidelines, availability of tests, risk stratification of employees, and worksite preparedness. We have created a new resource page on Cigna.com to help. Visit Returning to the Worksite to find resources and information to help keep employees safe while working during COVID-19.

What additional resources can Cigna offer?

We realize that as the COVID-19 situation continues to change, this may be stressful for some employees or their family members. To help, we have put together resources, information, and helpful links on <u>Cigna.com</u> to keep clients and customers up-to-date and informed.

Cigna Helpline at 855-287-8400 is available 24/7 for employees and their family members to speak with qualified clinicians about how to cope with anxiety, stress, or other issues related to the impact of the COVID-19.

My Secure Advantage* is a full-service financial wellness offering, available to all Cigna Group Insurance customers and their household members. This offering includes 30-days' pre-paid expert money-coaching for all types of financial planning and challenges, identity theft and fraud resolution services, and online tools for state-specific wills and other important legal documents. Your employees can access this benefit by calling: 888.724.2262 M-F 9am to 11pm EST or they can go online and visit https://cigna.mysecureadvantage.com/.

My Secure Advantage is providing articles, resources and weekly webinars on financial best practices in uncertain times. You can register for upcoming webinars <u>here</u>.

Additional <u>Value-Added Services</u>,** may be available for your employees. *Note: Programs and availability may vary based on product.*

Health Agency resources for more information:

- World Health Organization (WHO): www.who.int/emergencies/diseases/novel-coronavirus-2019
- Centers for Disease Control and Prevention (CDC): www.cdc.gov/coronavirus/2019-ncov/index.html

Together, all the way."



Please note: This content is offered for informational purposes only. It does not constitute medical advice. Always consult your doctor for appropriate medical advice and care recommendations tailored to your specific medical condition.

*My Secure Advantage is NOT insurance and does not provide reimbursement for financial losses. Program is provided through a third-party vendor who is solely responsible for their products and services. Full terms, conditions and exclusions are contained in the applicable client program description, and are subject to change. Program availability may vary by plan type and location, and is not available where prohibited by law. These programs are not available under policies insured by Cigna Life Insurance Company of New York.

**These programs are NOT insurance and do not provide reimbursement for financial losses. Some restrictions may apply. Programs are provided through third-party vendors who are solely responsible for their products and services. Full terms, conditions and exclusions are contained in the applicable client program description, and are subject to change. Program availability may vary by plan type and location, and are not available where prohibited by law. These programs are not available under policies insured by Cigna Life Insurance Company of New York.