

COVID-19: Client and Broker Frequently Asked Questions



Updated 5/19/2020

Please see below for a list of frequently asked questions and responses. Updates to this document will be made as new information becomes available. Please check back frequently for new information.

What action plans exist related to Nippon Life Benefits' office closures that may receive and/or process premiums or eligibility updates?

Nippon Life Benefits is well prepared for the challenges brought on by the pandemic. In an effort to protect our staff and best serve our customers, we have implemented processes and procedures that include remote work capabilities. These changes will ensure our clients and insureds continue to receive an uninterrupted and high level of service to which they are accustomed.

Please continue to check our website frequently for updates on our COVID-19 response. We will keep you informed of additional steps we take to protect our customers and employees.

Please know that Nippon Life Benefits is here to help. Rest assured that we will continue to pursue innovative and efficient ways to assist our members and clients. Contact our Customer Service team should you need any assistance.

Are you extending premium payment leniency/extending grace-period to clients whose business revenue has been directly affected by the COVID-19 pandemic?

At present, we are continuing to monitor and assess the situation need. Our current premium payment policy will remain in place and includes a 31-day grace period, but allows 60 days to make the payment prior to cancellation. We are in compliance with applicable law and regulatory mandates regarding COVID-19 and will continue to closely monitor updates that may be enacted related to this concern for premium payment extension. If you have specific needs or requests, please contact us directly with specific information so that we can clearly understand any business impact needs you may have.

For groups in New Jersey, please follow the link below in reference to Executive Order 123 and emergency grace period protections. <https://www.nipponlifebenefits.com/new-jersey-emergency-grace-period/>

Can I set up an electronic payment for my Company's monthly premium instead of sending a check to the lockbox?

Yes, Nippon Life Benefits has additional options available;

- Wire transfer or ACH payment push. For Wire Transfer and ACH payment push, the process is simple, please contact us via email at admin-info@nipponlifebenefits.com or by phone at 800-374-1835, ext. 43780 to request instructions.
- Automated Premium Payment (APP). This feature has some restrictions such as the requirement to be enrolled in the program continually and to pay as billed, versus paying for those currently eligible. Nippon Life Benefits will pull funds automatically based on the amount of premium due. Those funds will only be drawn during a set period, one time per month. This process can take up to 2-3 weeks to set up. Please contact us via email admin-info@nipponlifebenefits.com or phone 800-374-1835 ext. 43780 if you would like to review the parameters. While this auto-pay process is in the works, you could ask your bank to pay us via the wire transfer or ACH payment push.

Will future payments be handled automatically or will I need to initiate a payment?

The handling of payments will vary by the type of payment process.

- Wire transfer, or ACH Payment Push- Provides the flexibility to make your payment directly each month. You will need to initiate a payment each month once you've received your updated monthly billing statement.
- Automated Premium Payment (APP)- We initiate the payment pull automatically based on the monthly amount due.

Are employers able to offer benefits to employees in the event of lay-offs due to COVID-19?

Yes, through June 30th, 2020, Nippon Life Benefits will waive the coverage requirement that employees must be actively working in order to receive benefits, under the condition that the monthly premium payment is received. For groups facing entire workforce layoffs, benefits are also still available if there is one active employee available to continue benefit coverage and the monthly premium is received.

To continue benefits, non-discriminatory coverage must be offered consistently to all impacted employees and employee premium contributions must be equal or less than they were prior to the layoffs.

If I have changes to enrollment as a result of business changes due to COVID-19, what should I do?

If your plan meets the requirements outlined and you are continuing to pay premium for employees that are impacted by layoffs, hour reduction etc., there is no immediate reporting needed at this time. We will reach out to you with specific requirements prior to the end of the extension period of 6/30/2020. We will continue to assess the evolving situation regarding the eligibility extension date of 6/30/2020 and will provide updates to keep you aware of any changes.

If you have non-COVID-19 specific eligibility updates, please submit through our web portal at <https://www.nipponlifebenefits.com> or email to admin-info@nipponlifebenefits.com or fax directly to 1-913-387-5920.

Will employers be able to offer continuation coverage for employees who have been laid off? Can employers offer employees continuation coverage at the expense of the employee?

Employees have options for continuation of coverage. Employees may elect to continue coverage under COBRA or any applicable State Continuation programs by following standard notice and election procedures as long as one person remains actively employed. Please refer to your contact/booklet for details on these requirements. However, if there is not a single active employee, the plan is terminated and COBRA and/or State Continuation programs are not an option.

Will there be any change to rates or premiums should employee enrollment drop by more than 10% due to COVID-19?

No. From March 20, 2020 through June 30th, 2020, rates and premiums will not change due to loss of enrollment caused by COVID-19.

Will there be a waiting period to obtain coverage for employees who were temporarily laid off due to COVID-19 between March 20th and June 30th, 2020?

If an employee is rehired by June 30th, 2020, they will not be subject to a waiting period.

If an employee is furloughed before meeting the plan waiting period requirements, can they join the plan while on furlough?

If the plan requires the person to complete a waiting period then the person must be continuously employed as a Member for the duration of the waiting period to be eligible for benefit coverage.

How is Nippon Life Benefits navigating the new Department of Labor rule extending ERISA timeframes?

Recently, the United States Department of Labor issued an emergency regulation in response to the current pandemic. The regulation extends certain timeframes for all employee welfare plans including but not limited to: health, dental, vision, and disability plans, and is effective from March 1, 2020 until 60 days after the announced end of the National Emergency, which has not yet been announced. Nippon Life Benefits has adjusted processes to be fully compliant with the regulation and extended timeframes that are applicable to the following time limits:

- The Election period for newly unemployed individuals to enroll in a COBRA plan
- The date for making COBRA premium payments
- The date for individuals to notify the plan of a qualifying event
- Claim filing deadlines
- Appeal and external review request deadlines for an adverse benefit determination

For additional information on this emergency regulation, please reference the link below:

<https://www.federalregister.gov/documents/2020/05/04/2020-09399/extension-of-certain-timeframes-for-employee-benefit-plans-participants-and-beneficiaries-affected>

Please note, this information is intended as general summary information only and is not intended to offer legal advice. Employers and individuals should consult with their own qualified legal counsel for a comprehensive analysis of any applicable law, requirement or relief and how it may impact them.

How will the Family First Coronavirus Response Act affect Short Term Disability claims for members?

The Families First Coronavirus Response Act (FFCRA) requires certain employers to provide employees with paid sick leave or expanded family and medical leave for specified reasons related to COVID-19. Nippon Life Benefits' short term disability benefits will be coordinated accordingly, as long as the employee meets the disability requirements as designated by their plan coverage.

In order to prevent delays in claims processing, Nippon Life Benefits asks for a completed Disability Claim form which can be found at <https://www.nipponlifebenefits.com/member-service/>

Disclaimer

Nippon Life Insurance Company of America is continuously monitoring, and implementing policy and procedures to comply with, applicable federal and state law and directives related to the COVID-19 pandemic.

This information is subject to change, at any time and without notice, by Nippon Life Insurance Company of America. Further, the policies and procedures summarized herein may vary based upon your policy situs state and/or state of residence. Please contact Customer Service for additional details.

This material and information is intended for informational purposes only – the material and information provided on this website does not, and is not intended to, constitute legal or medical advice.