Please note that the following is intended to be used for general guidance purposes only — it is not intended to constitute legal advice, nor is it a dispositive position on coverage. Each claim is subject to review by the applicable insurer and coverage is dependent upon the terms and conditions of your specific insurance policy.
AGENDA

1. Additional FFCRA Guidance & FFCRA Scenarios
2. Review/Readying to Reopen – Benefit Considerations
3. Our Team’s Resources
4. Questions (Q/A Session)

**Disclaimer: The information presented here is current as of April 21, 2020. The government is frequently issuing new guidance, and we will address updates each week.
Additional FFCRA Guidance & FFCRA Scenarios
DOL Releases more Q&As

- Published on April 20

**Questions 80-88**
- 80-81 – How to compute hours for employees working irregular hours
- 82-83 – How to compute “regular rate”
- 84 – Allowing rounding hours
- 85 – Determining “regular rate” when leave taken during different periods
- 86 – FFCRA integration with employer leave policies
- 87 – Stay-at-home or shelter-in-place orders = federal, state, or local quarantine or isolation order
- 88 – Hourly recovery amount if DOL brings action against an employer

- How do employers compute the number of paid sick leave or expanded FMLA hours to provide an employee with irregular hours?

- What is the employee’s ‘regular rate’?

- Can an employer require an employee to use their PTO instead of paid sick or expanded FMLA leave?
IRS Releases one additional FAQ

• Published on April 17

• Question 67 – Employers that claim the small employer exception will get a tax credit if they provide the leave for some reasons, but not others

• Can a small employer recognize some COVID-19 reasons for leave and not others?

• What would this mean for the tax credit?
FFCRA Flowchart: Is Employee eligible for expanded FMLA?

- **Does the employer have less than 500 employees on the date of leave request?**
  - No: EE is not eligible for EFMLA
  - Yes: Has the employee worked at least 30 days?
    - No: EE is not eligible for EFMLA
    - Yes: Does the employee need to miss work to care for son/daughter whose school or place of care is closed due to COVID-19?
      - No: EE is not eligible for EFMLA
      - Yes: Employee can take 12 weeks of job-protected FMLA leave.

10 days of unpaid leave & up to 10 weeks at 2/3 pay (capped at $200/day or $10,000 in aggregate)
FFCRA Flowchart: Is Employee eligible for emergency paid sick leave?

Does the employer have less than 500 employees on the date of leave request?

No

EE is not eligible for EPSL

Yes

Does the employee need to miss work for one of the 6 recognized reasons?

No

EE is not eligible for EPSL

Yes

Reasons

1. EE quarantined or isolated by federal, state or local order
2. EE advised by health care professional to self-quarantine due to concerns related to COVID-19
3. EE experiencing COVID-19 symptoms and seeking medical diagnosis
4. EE caring for an individual subject to reason #1 or #2
5. EE caring for a child because of school or childcare facility closure
6. EE experiencing any other substantially similar condition specified by the Secretary of HHS

Employee can take up to 80 hours of paid leave (pro-rated for part-time EEs)
- Reasons 1-3 = 100% of pay up to $511/day
- Reasons 4-6 = 2/3 of regular pay up to $200/day
FFCRA Scenario 1

Facts:

• Maria works for a hardware store (with less than 500 employees) that is open for business during COVID-19 crisis

• Maria has a 3-year old child whose daycare is closed due to COVID-19

• Maria cannot work from home and must care for her child

• Maria is eligible for both expanded FMLA and emergency paid sick leave

• Emergency paid sick leave can be used for the 10 days before expanded FMLA kicks in

• Maria should request leave and provide employer with her name, dates of leave, reason for leave, name of child, name of daycare, and statement that no one else is available to care for the child
FFCRA Scenario 2

Facts:

• Tommy works for a retail operation (with less than 500 employees) that is closed during COVID-19 crisis because of the state’s stay-at-home order. No employees are able to work.

• Tommy has a 8-year old child whose school is closed due to COVID-19

• Tommy must care for his child

• Tommy is not eligible for expanded FMLA nor emergency paid sick leave because the business is closed (in other words, there is no work for him to do)

• Tommy could likely seek unemployment

• The answer would be the same if Tommy was furloughed
FFCRA Scenario 3

Facts:

• Esther works for a payroll company (with less than 500 employees) that is having employees work from home during COVID-19 crisis

• Esther could potentially work from home, but is experiencing COVID-19 symptoms and seeking medical diagnosis

• Esther is eligible for up to 80 hours of emergency paid sick leave

• Esther should request leave and provide employer with name, dates of leave, reason for leave, statement that she is unable to work due to reason, and name of healthcare provider from whom she is seeking medical diagnosis
Non-FFCRA Scenario 4

Facts:

• Reuben works for an IT company (with 600 employees) that is having employees work from home during COVID-19 crisis

• Reuben is ill from COVID-19.

• Reuben is not eligible for FFCRA because it doesn’t apply to his company

• Reuben could still be entitled to conventional FMLA
Reviewing/ Readyng to Reopen: Benefit Considerations
Reviewing/Readying to Reopen – Benefit Considerations

**Covid-19 Related Legislation:**
- Families First Coronavirus Response Act (FFCRA)
- Coronavirus Aid, Relief, and Economic Security Act (CARES Act)
- FFCRA & CARES Act Subsequent Guidance (HHS, DOL, Treasury FAQs)
- State Laws
- Proposed Legislation

***Questions:***
- How do these laws affect each component benefit plan?
- What steps do I need to take now?
- What is the status of the various proposed measures?
Reviewing/Readying to Reopen – Section 125 Cafeteria Plan

Section 125 Cafeteria Plan

• Allows for pre-tax deferrals of benefit payments

• Eligibility terms are key

• Elections cannot be changed absent a qualifying event (QE) recognized in the plan document

• Non-discrimination rules apply

• What are the eligibility terms?

• Which QEs are recognized in the document?

• Is a salary reduction a QE?

• Is an insurer’s COVID-19 special enrollment now a qualifying event?

• Should I still perform midyear testing?
Reviewing/Readying to Reopen – Group Health Plan

Group Health Plan

• Provides significant benefits in the nature of medical care

• Eligibility terms are key

• For ALES, ACA mandates/shared responsibility rules continue to apply

What are the eligibility terms?
  • Are furloughed employees eligible?
  • How are rehires treated?

How does the ACA measurement period affect eligibility?

If the employer’s share of the premium or the employee’s salary is reduced, how does this affect affordability?
Group Health Plan

- FFCRA (as amended by CARES Act) mandates COVID-19 testing is covered for both fully insured and self-funded plans without cost sharing

- What items and services are included in COVID-19 testing?

- Are antibody tests included?

- When must the coverage be provided?
Group Health Plan (HDHP)

- HSA-Compatible HDHP generally cannot provide benefits other than preventive care without cost-sharing until HSA statutory deductible is met, BUT:
  - per IRS Notice 2020-15, COVID-19 testing and treatment can be covered by HDHP before deductible is met without impacting HSA eligibility
  - and CARES Act permits telehealth and other remote care services (not limited to COVID-19 care) to also be covered

- If the plan elects to cover COVID-19 treatment without cost-sharing, does the plan need to be amended first?

- Do participants need to receive an SBC 60 days before the additional coverage is effective as per the ACA?
Health Savings Account (HSA)

- HSA arrangement is generally not an ERISA plan

- For pre-tax contributions through a cafeteria plan, employee must have option to change election at least monthly

- ER may contribute to plan and contributions are not forfeitable

- Non-discrimination rules apply to HSA contributions made through a cafeteria plan

- Cares Act permit OTC drugs and menstrual products to be covered by HSA

- Can an HSA employer contribution be reduced or eliminated prospectively midyear?

- Can employees who are laid off use HSA funds to pay for COBRA premiums?

- When can the HSA owner begin using the HSA funds to pay for OTC items?

- Can the HSA funds be used to buy face masks to prevent the spread of COVID-19?
Reviewing/Readying to Reopen – Group Health Plan (COBRA)

**COBRA**

- Few coverage exceptions – church, federal government, < 20 employees in prior year

- Covered employees, spouses and dependents who lose plan eligibility due to furlough, layoff, reductions in hours must be offered COBRA

- Many states have continuation coverage for employees of small employers not covered by federal COBRA

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- Has COBRA been timely offered to all qualified beneficiaries upon a loss of plan eligibility?

- Can coverage be extended beyond 18 months?

- Are there any options for employees who cannot afford the COBRA premiums?

- Does COBRA need to be offered for dental and vision plans?
Reviewing/Readying to Reopen – Health FSA

**Health FSA**

- Furloughed employees and Coverage Plan document should be reviewed with respect to furloughed employees.
  - If furlough results in loss of health FSA eligibility, then the employee can drop FSA coverage (or it may terminate automatically).
  - Employees with underspent FSA balances can elect COBRA for remainder of plan year.
- But if eligibility continues through a furlough (including FSA eligibility), then there would be no qualifying event.
- CARES Act permits OTC drugs and medicines and menstrual products to be covered by health FSA.

- Are there any proposals to allow furloughed and other employees to change or revoke elections due to the COVID-19 pandemic?
- Are there any potential options for employees with underspent accounts who could not receive elective medical care due to COVID-19? Will these employees be given more time to use funds so they are not lost?
- When can an FSA plan cover non-prescription medications and menstrual products? Is an amendment necessary to do so?
DC FSA

• Unlike other types of FSAs, the DCFSA rules tend to be interpreted liberally.

• So, employees can generally adjust (stop, modify or restart) elections prospectively in accordance with a childcare cost or coverage change (as long as document permits).

• Employee with childcare closures may be eligible for FFCRA paid sick leave or EFMLA

• COVID-19 does not suspend nondiscrimination rules!

• Due to childcare closures, can employees reduce their DCFSA elections or opt out altogether?

• What if the child will now be watched by a relative for free due to a furlough?

• Does FFCRA FMLA leave still apply once the school season is over?

• Is it still necessary to perform non-discrimination testing if so few are participating?
Reviewing/ Readying to Reopen: Other Arrangements and Policies
As a result of the COVID-19 pandemic, employers are reviewing (or considering):

• Employee Assistance Programs (EAPs)
• Telehealth Arrangements
• Wellness Programs
• Leave Policies
• HIPAA Policies and Procedures

- Is there new guidance?
- Are there issues that may have been overlooked?
- What changes should be considered now?
Employee Assistance Programs (EAPs)

• Typically must be carefully designed so as not to provide “significant benefits in the nature of medical care” taking into account the nature, duration, amount and scope of covered services.

• If EAP provides such significant benefits, then additional legal requirements (e.g. under ACA, ERISA) must be satisfied.

• Recent guidance has addressed utilization of EAPS during pandemic.

• Can EAPS offer benefits for COVID-19 testing and diagnosis without being considered ‘significant medical care’?

• If so, for what time period is this guidance effective?
Telehealth Services

• Telehealth services have become immensely popular during the pandemic as a method is sought to diagnose individuals while mitigating the spread of COVID-19.

• Many states have encouraged or required insurers to offer or expand telehealth services (in some cases without cost sharing).

• Are telehealth services considered ‘significant medical care’ or can these arrangements be offered similar to an EAP for COVID-19 treatment and diagnosis?

• What steps should I take as an employer with respect to telehealth offerings?
Wellness Programs

- Many employers offer to promote fitness and well-being
- Depending on design, many laws – HIPAA, ERISA, ADA, GINA can apply
- Program may be participatory (attend a wellness seminar) or health contingent by activity (i.e., walking program) or outcome based (i.e., quit smoking).
- Under HIPAA non-discrimination rules for health contingent programs, reasonable alternatives or waivers apply. I.e., employee must be given alternative or waiver to receive reward (e.g., elimination of surcharge) even if employee does not meet standard.

Employer should review wellness program during pandemic and consider:

- Was employee able to participate in health contingent or outcome based program?

- If not, was a viable reasonable alternative or waiver offered?

- Is a surcharge waiver or subsequent rebate appropriate?
Reviewing/Readying to Reopen- Leave Policies

**Leave Policies**

- Employers have their own leave and PTO policies
- If < 500 employees, FFCRA paid sick leave and expanded FMLA apply through 12/31/20
- Conventional FMLA may still apply (e.g., serious health condition of EE of family member)
- States may have paid sick leave, family and disability leave
  - Some have added special COVID-19 leave provisions (e.g., NY)
- Counties and cities can have their own requirements (e.g., Westchester County, NY) not necessarily superseded by state law

Employer should review all applicable leave policies to determine:

- How do these policies interact?
- Do they run concurrently?
- Is intermittent leave permitted?
- Does employer wish to modify its own policies prospectively?
Reviewing/Readying to Reopen - HIPAA Policies and Procedures

**HIPAA**

- Employers with self-insured plans will inevitably have some involvement with PHI even if limited to matters such as appeals
- So, employer should have HIPAA policies and procedures and training for staff
- Business Associate Agreements (BAAs) should be in place between the covered entity (plan) and service providers regarding the use, storage and transmission of data
- Minimum necessary rules apply in terms of disclosure

**Employer should review policies and procedures and consider:**

- Has COVID-19 pandemic response affected or increased employer’s handling of PHI?
- Do policies and training need to be modified accordingly?
- Employer should consult with employment counsel regarding PHI disclosure parameters with respect to the COVID-19 pandemic.
Our Team’s COVID-19 Resources
Frequently Asked Questions: Benefits Compliance and COVID-19
Last Updated April 16, 2020

Table of Contents
COVID-19-Related Policies, Leave, and Other Impact on Benefits
1. What are the implications for group health plans if employees are furloughed (or an unpaid leave of absence)?
2. If Salary Continuation during Furlough is allowed, can we allow employees to be furloughed beyond the Federal definition of 30 calendar days?
3. What happens if employees are laid off?
4. Can an employee receive unemployment while on furlough?

Families First Coronavirus Response Act
5. What is the Families First Coronavirus Response Act (FFCRA)?
6. When is the FFCRA effective?
7. Which employees are subject to the FFCRA?
8. How do the controlled group rules interact with the FFCRA?
9. When does the small business exemption apply to exclude a small business from providing paid sick leave due to school or place of care closures or child care provider unavailability for COVID-19-related reasons?
10. When is a business with fewer than 50 employees exempt from the requirements to provide paid sick leave or extended family and medical leave?
11. How does FFCRA apply to non-profit organizations?
12. How does FFCRA apply to public sector employers?
13. Does FFCRA apply to union employees?
14. If an employer utilizes a staffing agency for temporary workers, which entity includes those workers in their count? Which entity is responsible for providing the paid leave?
15. Are there definitions of "full time" and "part time" for purposes of FFCRA?
16. Are there definitions of "spouse" and "dependent" for purposes of FFCRA?
17. Which "health care providers" can be excluded by their employers from the emergency paid sick leave and expanded FMLA leave granted under the FFCRA?
18. Which "emergency first responders" can be excluded by their employers from the emergency paid sick leave and expanded FMLA leave granted under the FFCRA?
19. What are the consequences for an employee who refuses to comply with the FFCRA requirements?
20. How does an employee qualify for expanded FMLA?
21. What pay benefits are provided under the expanded FMLA provision?

FAQs
- Can the emergency expansion to FMLA be used simultaneously?
- If an employee took 12 weeks of FMLA within the last 12 months, are they entitled to the emergency FMLA expansion now?
- Will FMLA be updated to reflect the new leave?

Families First Coronavirus Response Act Extension
- What was the original and expanded requirements?
- How long are the employees required to remain in compliance?
- What benefits are provided under the extension?
- How does the FFCRA extend the paid sick leave beyond the 45 days?
- How can employees be excluded from the emergency leave?
- Will the emergency paid sick leave be extended for all employees?
- When is the emergency paid sick leave required?
- What are the requirements for all employees?
- What is the impact on employer benefits?

PAYCHECK PROTECTION PROGRAM
- What is the Paycheck Protection Program?
- How does the program work?
- What does the program subsidize?
- What are the loan forgiveness options?
- What is the term of the loan?
- What is the interest rate?
- What are the application deadlines?

OTHER ECONOMIC SUPPORT
- How will economic stimulus checks provide for expanded benefits?
- How will economic stimulus checks provide for expanded benefits?
## State-Focused Resources: Quick Reference Chart

### NFP Benefits Compliance: COVID-19 State Updates

**Current as of April 15, 2020**

<table>
<thead>
<tr>
<th>State</th>
<th>Date</th>
<th>Bulletin No.</th>
<th>Description</th>
<th>NFP Article</th>
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<tr>
<td><strong>Alabama</strong></td>
<td>3/17/20</td>
<td>2020-02</td>
<td>requests carriers to waive cost-sharing for COVID-19 testing</td>
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<td></td>
<td>2020-04</td>
<td>addresses continuity of operations during coronavirus pandemic</td>
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<td>3/30/20</td>
<td>2020-05</td>
<td>provides policy cancellation recommendations</td>
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<td><strong>Alaska</strong></td>
<td>3/3/20</td>
<td>2020-01</td>
<td>allows refills w/o carrier authorization</td>
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<td>3/6/20</td>
<td>2020-03</td>
<td>requires carriers to waive cost-sharing for COVID-19 (and other respiratory issue) testing; encourages telehealth expansion</td>
<td>NFP Article</td>
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<td>3/17/20</td>
<td>2020-07</td>
<td>requires telehealth coverage for all covered services</td>
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<td>3/18/20</td>
<td>2020-08</td>
<td>prohibits carriers from terminating coverage due to nonpayment of premiums; waives late fees for late payments</td>
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<td>3/18/20</td>
<td>2020-09</td>
<td>requires carriers to waive cost-sharing for COVID-19 tests for office, urgent care and ER visits</td>
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<td>3/20/20</td>
<td>2020-10</td>
<td>encourages carriers to allow employers to revisit premium rates relating to increased COVID-19 exposure/risks</td>
<td>NFP Article</td>
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<td>3/18/20</td>
<td>2020-11</td>
<td>Regulatory Order 830-02 extends deadlines for external health care reviews</td>
<td>NFP Article</td>
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<td>3/23/20</td>
<td>2020-12</td>
<td>Emergency Rule Amendment to 2 AAC 31.450.  To include persons suffering respiratory distress syndrome as high-risk individuals whose coverage is subject to reinsurance</td>
<td>NFP Article</td>
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<td></td>
<td>3/27/20</td>
<td>2020-13</td>
<td>imposes new requirements for group health plans, claims and telehealth related to COVID-19 outbreak</td>
<td>NFP Article</td>
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<td>3/29/20</td>
<td>2020-14</td>
<td>temporarily suspends certain utilization review and notification requirements</td>
<td>NFP Article</td>
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<td><strong>Arizona</strong></td>
<td>3/11/20</td>
<td>Exec Order 2020-07</td>
<td>requires coverage of COVID-19 testing without cost sharing; encourages telemedicine</td>
<td>NFP Article</td>
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<td>3/25/20</td>
<td>Exec Order 2020-15</td>
<td>requires telehealth be treated on same terms as in-person visit</td>
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State-Focused Resources: Quick Reference Chart

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### Arizona
- **Executive Order 2020-17**: Requires board of pharmacy to waive certain requirements and allow pharmacists flexibility to fill emergency refills for up to 30 days supply. (NEP Article 4)
- **FAQ** (Arizona Department of Health and Human Services): Application of Fair Wages and Healthy Families Act to COVID-19 outbreak (NEP Article 4)
- **Bulleted 3.2020**: Telemedicine must be covered on same terms as in-person visits (NEP Article 4)
- **Insurance Department Announcement**: Identifies regulatory suspensions due to public health emergency (NEP Article 4)

### California
- **New COVID-19 FAQ** for Employers, and on Paid Family Leave and Unemployment Insurance (NEP Article 4)
- **New CA Chart**: Benefits for Workers Impacted by COVID-19 (NEP Article 4)
- **FAQ** (California Department of Insurance): Encouraging carriers to take necessary steps to maintain ability to process claims in timely manner (NEP Article 4)
- **CA Insurance Department Notice**: Encouraging carriers to provide a 60-day grace period for insurance premium payments (NEP Article 4)
- **CA Insurance Department Notice**: On essential business and insurance, encouraging carriers to continue core insurance functions as possible during COVID-19 pandemic (NEP Article 4)
- **Covered California**: State health insurance exchange announces special enrollment for any Californian to enroll by June 15 (NEP Article 4)

### Colorado
- **Executive Order No. 18-20**: Requires COVID-19 testing without cost-sharing; one-time early Rx refills (NEP Article 4)
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### Connecticut
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### Delaware
- **Executive Order No. 19-20**: Orders all carriers to provide a 60-day grace period to defer payment due (NEP Article 4)
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### District of Columbia
- **Executive Order No. 19-20**: Provides a 60-day grace period to defer payment due (NEP Article 4)
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### Frequently Asked Questions
- **FAQ**: Discussion on adequacy of leave (NEP Article 4)
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- **FAQ**: Discussion on adequacy of leave (NEP Article 4)
- **FAQ**: Discussion on adequacy of leave (NEP Article 4)

### Additional Information
- **OLC Guidance**: On use of paid sick leave during COVID-19 pandemic (NEP Article 4)
- **OLC Guidance**: On use of paid sick leave during COVID-19 pandemic (NEP Article 4)
- **OLC Guidance**: On use of paid sick leave during COVID-19 pandemic (NEP Article 4)
- **OLC Guidance**: On use of paid sick leave during COVID-19 pandemic (NEP Article 4)
- **OLC Guidance**: On use of paid sick leave during COVID-19 pandemic (NEP Article 4)
State-Focused Resources: State Leave and Unemployment Legislative Updates

State Leave and Unemployment Legislative Response to COVID-19

State Leave

Alaska
- HB 363: Relates to unemployment benefits during a period of state or local emergency resulting from a novel community disease (COVID-19) outbreak. 

Arizona
- SR 1094: An emergency measure that provides the Arizona Department of Economic Security (DES) money from an alternative unemployment insurance (UI) benefit program for people impacted by the coronavirus disease (COVID-19) outbreak. 

California
- SB 1437: Authorizes wage replacement benefits to workers who take off work to care for a minor child whose school has been closed due to the COVID-19 outbreak. 

District of Columbia
- B 744: Provides, as an emergency basis, additional authority to the Mayor to address critical needs of District residents and businesses during the current public health emergency, including wage replacement, business relief, and additional authorities and exemptions regarding health, public safety and consumer protection. 

District of Columbia
- B 745: Provides, as an emergency basis, additional authority to the Mayor to address critical needs of District residents and businesses during the current public health emergency, including wage replacement, business relief, and additional authorities and exemptions regarding health, public safety and consumer protection, and to provide for the issuance, sale, and delivery of certain District of Columbia notes and bonds. 

District of Columbia
- B 746: Provides, as an emergency basis, additional authority to the Mayor to address critical needs of District residents and businesses during the current public health emergency, including wage replacement, business relief, and additional authorities and exemptions regarding health, public safety, consumer protection, and personal property. 

Unemployment

District of Columbia
- B 747: Prohibits certain workforce protections related to family and medical leave due to the coronavirus outbreak. 

State Leave and Unemployment Legislative Updates


Laws enacted April 16, 2020

Effective March 18, 2020, New York enacted Senate Bill S2601, referred to as Governor Cuomo’s New COVID-19 Paid Sick Leave Law (hereafter the “NY Act”), in response to the coronavirus pandemic. Employers that are subject to New York State Workers’ Compensation Law are subject to the provisions of the NY Act on behalf of all persons recognized as employees under state’s Workers’ Compensation Law.

The NY Act eliminates job protected leave and paid sick leave for a covered employee who is unable to work due to a mandatory or precautionary order of quarantine or isolation imposed on the employee or an employee’s minor child in connection with COVID-19. It also requires the application of existing statutory New York Paid Family Leave (NYPLL) and New York Disability (NYSID) under specific circumstances related to COVID-19. Benefits under the NY Act are not available to employees who are able to work through remote access or other means.

The benefit enhancements of the NY Act apply to the individual who is an employee if the employee is a minor child. In order to be entitled to a mandatory or precautionary order of quarantine or isolation issued by the State, department of health, local board of health, or governmental entity duly authorized to issue such order due to COVID-19 (the NY Act, § 201-b, section 2).

Preventive social distancing and “stay-at-home” measures, even if by order of the state (such as New York State on PAUSE), do not constitute quarantine or isolation orders for purposes of the NY Act. Nonetheless, the NY Act does not cover employees who are unable to work due to their child’s school closure, unless the school is closed due to a mandatory or precautionary order of quarantine or isolation issued by the State, department of health, local board of health, or governmental entity. In addition, the NY Act does not cover employees who voluntarily choose to self-quarantine or self-isolate but who are not subject to a state authorized quarantine or isolation order.

This white paper describes the basic components of the NY Act. The intended to serve as a guide to the state provisions at a high level of the publication date noted in the footer. The regulatory environment is changing rapidly in response to the COVID-19 pandemic, and our understanding of the NY Act and its application may change as more information becomes available. Employers with specific questions should work closely with their benefits consultants to address case-specific concerns. Please also see the “Resources” section of the white paper for additional information.

Highlights of the NY Act

The provisions of the NY Act pertain exclusively to employees businesses and other matters, 16, 2020, that are directly related to COVID-19 and that are not covered to a greater extent by the federal Families First Coronavirus Response Act (FFCRA) enacted effective April 1, 2020.
COVID-19-Related Podcasts
Q/A Session: Questions Please!
Resources:

FFCRA: https://www.congress.gov/116/bills/hr6201/BILLS-116hr6201enr.pdf
FFCRA Fact Sheet: https://www.dol.gov/agencies/whd/pandemic/ffcra-employee-paid-leave
FFCRA: Questions and Answers: https://www.dol.gov/agencies/whd/pandemic/ffcra-questions
FFCRA Non-enforcement Bulletin: https://www.dol.gov/agencies/whd/field-assistance-bulletins/2020-1
FFCRA Notice FAQs: https://www.dol.gov/agencies/whd/pandemic/ffcra-poster-questions
IRS Filing and Payment Deadline Extension Q&As: https://www.irs.gov/newsroom/filing-and-payment-deadlines-questions-and-answers
Visit our Latest Insights page for more COVID-19 coverage

https://latest-insights.nfp.com/
Tomorrow’s Webinar: COVID-19 HR Solutions Updates & FAQs

https://nfp.zoom.us/webinar/register/WN_v7PxBvzb3QgeVzUolZw1Jiw