



Good Afternoon,

We are beginning to receive some additional information from the Department of Labor regarding the Relief Act and have outlined the main points of what we have learned below. We are still awaiting additional details from the administration of the Act such as, what documentation (if any) employees will need to provide in order to take the leave and how employers can file for an exemption from portions of the Act. We expect those details to be released over the next few days. As you will note, the Act has an official name now: Families First Coronavirus Response Act (FFCRA).

For the companies in which we provide payroll services, we are in the process of setting up specific codes to be used to track the time taken by employees under the FFCRA. Our Payroll Tax Department is also working diligently to set-up the infrastructure needed for processing the tax credits under the Act.

Q: Did the coronavirus relief bill change effective dates? We were told it would be April 2, 2020.

A: The Department of Labor (DOL) announced today that the Families First Coronavirus Response Act's (FFCRA's) emergency paid-leave provisions are effective April 1, 2020 – December 31st, 2020. The FFCRA states the leave provisions "shall take effect no later than 15 days after the date of enactment." Since the act was signed on March 18, many people assumed the DOL would implement the law on April 2.

"The legislation will ensure that workers are not forced to choose between their paychecks and the public health measures needed to combat the virus while at the same time reimbursing businesses," the DOL said.

Q: Do I have to notify my employees of their leave options?

A: Yes. The Department of Labor has released a notice that should be hung in a conspicuous place on the company premises. An employer may satisfy this requirement by emailing or direct mailing this notice to employees or posting this notice on an employee information website (internal or external). We have attached the notice to this email for your use.

For those employers using our Employee Navigator or Kronos WorkForce Ready onboarding systems, your HR Manager will be adding the notice to that system as well.

Q: How is an employee's benefit coverage impacted if his/her schedule is reduced to less than 30 hours per week?

A: For our PEO clients, BlueCross BlueShield of Tennessee informed us the 30 hours worked per week requirement has been lifted for the next 90 days. That means your employees will be able to continue their current medical, dental and vision coverage for the next 90 days even if they are not working 30 hours a week.

For our HRO clients, please contact your LBMC EP assigned broker to determine if similar exemptions have been made by your insurance companies. Most carriers are following the same process so we would hope this to be true for your plan.

If we are not your broker, please contact your broker for the facts on your plan.

Q: What about my furloughed employees? Do they get benefits?

A: Yes. The same answer from the question above applies since they are still considered active employees. You we will help you make arrangements to collect their portion of the premiums. If you would like to wait until the employee returns to work to collect their portion of the premiums, please let your HR Manager know. We can set up a payment plan to double deduct the premiums until they are caught up.

You must be consistent in your practices and give all furloughed employees the ability to keep their benefits.

Q: How can my employees get additional information about their medical coverage as it pertains to COVID-19?

A: For those of you in the PEO, please share the attached FAQ document from BlueCross BlueShield of Tennessee. For those in the HRO model, your LBMC EP Broker will send any information we get from the carriers as it is received.