

City of Seattle

Policy on Benefits Enrollment Deadline Exceptions

The purpose of this policy is to define exceptions to the enrollment period deadlines established by the Personnel Department by which City employees are permitted to make changes to their own coverages in benefit plans governed by Section 125 of the Internal Revenue Code. Although each deadline is widely communicated before and during the enrollment period, we wish to recognize circumstances beyond an employee's control that may make timely enrollment problematic, generating a request for an exception. To clearly recognize "unforeseen emergency" situations and still comply with IRS rules that we operate the plans in a way that is not arbitrary and capricious, the City has identified several acceptable enrollment deadline exceptions which meet the criteria of "unexpected" and "severe".

- 1. Out of the Area for the Entire Enrollment Period:** An employee may be out of the area for the entire open enrollment period; this would include employees on leaves, such as military or sabbatical leave. Example: An employee is on military leave for the entire open enrollment period and did not have a power of attorney document on file that authorized another individual to make benefit changes for the employee. The returning employee will be allowed to make plan changes. However, inability to log into the City's enrollment system while out of area with limited or unpredictable Internet access for shorter periods does NOT qualify for an exception.
- 2. Illness for the Entire Enrollment Period:** An employee may be out of the office due to illness for the entire enrollment period; this includes employees on extended Family/Medical leave. Example: An employee who was on full workers' compensation time loss for the entire period is eligible to make a change following the deadline. However, an employee who was on partial time loss, but was working for a portion of the open enrollment period, is NOT eligible to make a change after the deadline. A brief period of illness also does NOT qualify for an exception unless it is of a dire nature and occurs just prior to close of open enrollment (see #5 below).
- 3. Technical Difficulty:** If an employee has made a technical error – for example, accessed the ESS enrollment panel without saving the change correctly – the election change may be made after the deadline. Example: If employees encounter difficulty logging into and/or saving changes to the system on the last day of enrollment, they should provide documentation of the technical difficulty when requesting an exception. However, inability to log onto the system because of unknown or outdated passwords does NOT qualify for this exception.
- 4. Communication Barriers:** Some employees may have communication challenges – such as English as a second language (ESL) or a learning disability, for example – and make erroneous enrollment elections; others may have received incorrect written information from an otherwise reliable source. These issues could support an exception. However, verbal misinformation will NOT justify an exception if there is a significant body of correct, written material available.
- 5. Unanticipated Emergency Absence on the Last Day of the Enrollment Period:** An employee may have been planning to make changes on the last day of the Open Enrollment period, but is absent from work due to a dire emergency situation and unable to call their Benefits Representative or log into the system. Examples of a dire emergency may include: the employee's own life-threatening illness, life-threatening illness or injury in the immediate family, bereavement, or a severe earthquake or snowstorm. However, a routine illness such as flu or cold or a scheduled vacation does NOT qualify for this exception.

- 6. Other Unusual Circumstances Not Covered Above:** Other unusual circumstances may occur that prevent employees from calling their Benefits Representative or logging into the system to make personal benefit elections. The Benefits Unit will confer with the Employee Health Services Director and/or the Personnel Director to evaluate these situations, taking into account the unanticipated nature and severity of the interfering event.

Procedure:

In all of the situations listed above, employees must first contact their department's Benefits Representative to review the appropriateness of their request. **Under no circumstances will exceptions be granted by department benefits or human resources representatives.**

All formal exception requests must be in writing and directed to the Personnel Department's Benefits Manager by the requesting employee. Requests will be reviewed on a case-by-case basis by Benefits Unit staff to confirm the validity of the request for an exception to the deadline. Information reviewed may include system audit reports, relevant emails, Employee Self-Service pages, and payroll entries. If a change is allowed, the new election must be submitted no later than ten (10) business days after the enrollment exception request is approved.

If the employee is not satisfied with the Benefits Unit's decision, disputed decisions will be referred to the Personnel Director for final decision-making.

This policy is adopted.


Signature


Date

Darwyn B. Anderson
Acting Director of Personnel