Kilpatrick

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DOL Automatic Health Plan Enrollment

Last Friday the Department of Labor held a conference regarding the standards for automatic health plan enrollment. Under the Affordable Care Act, employers with at least 200 employees must automatically enroll new full-time employees in health coverage and carry forward existing coverage elections from year to year. Almost everyone at the conference recommended a "reasonable expects" standard so that employers can still classify employees as full-time or part-time without having the burden of counting actual hours. Further recommendations included only requiring employees and not dependents to be automatically enrolled. With today's workforce, requiring auto enrollment of spouses and even dependent children would result in most spouses and many children having unnecessary double coverage. The next step for the DOL is proposed regulations or other guidance implementing the requirement, and thus we will need to wait to see if DOL is listening.