

For brokers and producers only

Date: October 17, 2019

Market: **2-50 Group**

Updating ACA Small Group Eligibility Guidelines Regarding Common Law Employees

Effective immediately, CareFirst BlueCross BlueShield (CareFirst) is updating our Affordable Care Act (ACA) Small Group Eligibility Guidelines regarding common law employees. Consistent with federal and state laws, MD and DC headquartered groups must have at least one full-time common law employee enrolled in coverage. As stated in prior Broker News releases, owners and their spouses are not considered “Common Law Employees” under federal law.

In Virginia, this rule is subject to an exception which allows LLCs, Partnerships and Sole Proprietors meeting certain statutory requirements to obtain small group coverage in the absence of a common law employee.

All 2-50 groups must comply with these eligibility guidelines at renewal to maintain coverage.

For more information

Please contact your broker sales representative for any additional questions.