

Income Continuation Insurance and Leave Coordination

Effective March 1, 2024, the City will participate in the Local Income Continuation Insurance (ICI) benefit through ETF. ICI is a voluntary “income replacement” (similar to a short-term disability policy) benefit available to all employees who participate in the Wisconsin Retirement System (WRS). The Local ICI program is currently under a premium holiday – which means there are **no premiums (no cost) for 2024!**

ICI benefits are payable if you become disabled and wish to take the benefit at the time of the disability. ICI does not provide income continuation for caretaking of a spouse or child, or bonding with a newborn child. ICI provides **up to 75% of your average monthly earnings**, up to \$7,500 per month (up to \$120,000 annual earnings), based on your previous calendar year earnings rounded to the next highest \$1,000 and divided by 12. For newly hired employees, your estimated annual earnings are rounded to the next highest \$1,000 and divided by 12.

Before the benefit starts, you must serve your elimination period (also called a waiting period) which is 30-days unless you specifically enrolled in a longer elimination period. *You must be completely off work during this time.* Employees may use their sick leave, or other paid time off, until the waiting period is met. Sick leave, vacation, holiday, and compensatory time do not need to be exhausted before ICI benefit payments can begin.

In some circumstances, employees may want to use their sick leave, or other paid time off, instead of receiving income continuation at 75% of their prior year earnings. While on FMLA, employees who are enrolled in ICI and have an ICI qualifying event will have the option to apply for ICI benefits, or use their paid time off in lieu of receiving ICI benefits. Use of leave time after your elimination period is satisfied will delay the start of your ICI benefits or reduce the amount of benefits you receive, as benefits are reduced at the rate of 100% for payments you receive for leave time. Therefore, you are not able to supplement with leave time to receive 100% of your income. ICI will cap at 75% of your average monthly earnings as noted above.

ICI benefits are paid monthly at the beginning of the month for the previous benefit month (i.e. January benefits are paid February 1).

Anytime an employee has a period of incapacity, or anticipated period of incapacity, of more than three full consecutive calendar days (this includes work and non-work days) they must apply for Family and Medical Leave (FMLA). This holds true even if the employee is using sick leave for their absence or has applied for ICI. Please visit www.deperewi.gov/hrforms or contact Human Resources for the FMLA application. The FMLA application must be completed at least 30 days in advance of planned medical leave of more than three **calendar** days, or as soon as practical for unforeseen medical leave.

Employees who are receiving ICI payments are considered to be in an unpaid status from the City of De Pere standpoint (you will be paid from ICI and not from the City of De Pere). This is important to know because it can affect your benefits. The following chart was created to help you understand what happens with benefits when you need to take leave.

	FMLA		Unpaid Leave of Absence
	Using Paid Time Off (i.e. sick leave, vacation, etc.)	Receiving ICI (i.e. not using sick leave, vacation, etc.)	Not eligible for FMLA or exhausted FMLA, and receiving ICI benefits.
Length	FMLA allows for a total of 12 weeks of leave time in a calendar year.		Unpaid leaves will typically not exceed 12 weeks unless required by law.
Minium Requirement to take leave	1 yr and 1,250 hours (1,000 hrs for state)		A leave of absence for illness shall not be granted unless an employee has exhausted all available family and medical leave (FMLA) and all accumulated leave time.
Substitution of Available Leave Time (i.e. vacation, sick, etc.)	Under Federal FMLA, the City has the ability to require employees to substitute all vacation, floating holidays, or sick leave during the leave period; FMLA is allowed to be unpaid under WI FMLA.	If an employee receives ICI benefits, the employee will not be required to substitute vacation, floating holidays, or sick leave for the period they receive benefits.	If an employee is not eligible for FMLA or FMLA has been exhausted, the City requires the employee to use all remaining accrued leave time (i.e. vacation, sick leave, etc.) prior to the employee receiving ICI benefits.
Medical, Dental and Vision Insurance Premiums	The employee will pay the employee rate; premiums will be deducted from their pay check.	To maintain insurance coverage the employee must continue to pay the employee portion of the premium on a bi-weekly basis while on leave. The premium due date is the payroll date in which the deduction would have been taken; coverage will cease if payment is not received within 30 days of the premium due date.	Insurance may be retained if the entire premium is paid monthly by the employee during calendar months that the employee is off the payroll for the entire month.
Paid Holidays	Employees will receive holiday pay.	To receive holiday pay, employees must be employed at the time of the holiday and work or use paid time off the workday before and workday after the recognized holiday. Represented employees should see their collective bargaining agreements for holiday accrual information.	To receive holiday pay, employees must be employed at the time of the holiday and work or use paid time off the workday before and workday after the recognized holiday. Represented employees should see their collective bargaining agreements for holiday accrual information.

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Vacation/Sick Leave/Admin Time/Floating Holidays	Employees will continue to accrue leave time.	No credit toward vacation, floating holidays, administrative time, or sick leave shall be earned while an employee is on leave without pay (i.e. is not using paid leave time). If an employee works a partial month (1st – 15th or the 16th – end of the month) then the employee will receive accruals for that month. Represented employees should see their collective bargaining agreements for vacation accrual information.	No credit toward vacation, floating holidays, administrative time, or sick leave shall be earned while an employee is on leave without pay. If an employee works a partial month (1st – 15th or the 16th – end of the month) then the employee will receive accruals for that month. Represented employees should see their collective bargaining agreements for vacation accrual information
LTD	Coverage remains	Coverage ends and is reinstated when the employee returns to work.	Coverage ends and is reinstated when the employee returns to work.
Flexible Spending	Coverage remains the same.	Employees have three options: 1) Revoke their election and reinstate it upon return (either at the full annual amount, or prorated based on the number of missed deductions); claims paid during the leave period are not reimbursable. 2) Keep the plan open and either make catch up payments after returning, pre-pay the deductions, or make payment to the City for the deductions while on leave. 3) Revoke the election and allow the plan to terminate.	In the case of an unpaid, non-FMLA leave, the employee can only make changes to their flexible spending if the leave causes them to lose eligibility under the plan. If it does not cause a loss of eligibility, the employee cannot make changes to their plan and they must make up any payroll deductions that they miss during the leave of absence.
Deferred Compensation	Contributions continue	Contributions are put on hold	Contributions are put on hold
WRS	Contributions continue	No contributions while not receiving pay from the City.	No contributions while not receiving pay from the City.

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ID Theft	Coverage remains	Coverage remains	Coverage remains
EAP	Coverage remains	Coverage remains	Coverage remains
Employment Protection	Upon return from family or medical leave, the employee will be returned to the same or equivalent position they held immediately prior to the leave	Upon return from family or medical leave, the employee will be returned to the same or equivalent position they held immediately prior to the leave.	None; employees may be granted a leave of absence as part of a reasonable accommodation under the Americans with Disabilities Act (ADA).

ICI benefits will not duplicate benefits available from other Wisconsin Retirement System (WRS) programs, the Social Security Administration, workers' compensation, unemployment compensation or certain other sources. You will be required to repay duplicate benefits back to the ICI program.

The Hartford is the Plan Administrator. All claims for ICI should be filed with The Hartford; claims may be filed up to 30 days before your anticipated last day worked in cases of impending childbirth or scheduled surgery.

For childbirth, ICI benefit for a normal, vaginal delivery will end 6 weeks after the date of delivery (8 weeks for an uncomplicated cesarean delivery). These time periods are standard durations used in the disability industry. However, if you have complications prior to or after delivery, ICI benefits may be paid longer, depending on whether the complication is considered disabling.

*Note: Because ICI is not administered by the City, medical certification received by the ICI Plan Administrator is not automatically received by the City. You must apply for and submit medical certification to the City to qualify for Family and Medical Leave (FMLA). The FMLA application must be completed at least 30 days in advance of planned medical leave of more than three **calendar** days, or as soon as practical for unforeseen medical leave.*

Plan Administrator Contact Information

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Fax: 1-833-357-5153
Email: ICIQuestions@thehartford.com

This informational handout is not intended to replace the information found in the City's policies, or Income Continuation Insurance brochure. This document is only a summary of the key information needed to assist with your leave planning. It is important for you to understand that the City's policies, benefits, state/federal laws, etc., are all subject to change. The information in this handbook is current as of the date it was prepared and updated.

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