



MEDICAL COVERAGE FOR NON-FULL-TIME EMPLOYEES AND CAST MEMBERS UNDER THE AFFORDABLE CARE ACT (ACA)

Eligibility Process and Frequently Asked Questions

To comply with the Affordable Care Act (ACA), Disney offers medical coverage to eligible non-full-time employees working in U.S.-based locations. In this document, “employee” includes both employees and Cast Members unless otherwise stated.

For locations outside Hawaii, eligibility is based on an average of at least 30 ACA eligible hours per week during a 12-month look-back measurement period.

Non-full-time employees in Hawaii meet the eligibility requirements under the Hawaii Prepaid Health Care Act if they are regularly scheduled to work 20 or more ACA eligible hours per week for four consecutive weeks.

Potentially eligible employees include non-full-time employees outside Hawaii whose regularly scheduled hours are fewer than 30 per week.

Non-full-time employees covered by a multi-employer union plan or trust fund are excluded because Disney contributes to the plan on their behalf. *See Other section for more information.*

All employees and Cast Members who meet the eligibility requirements will receive a benefit enrollment kit mailed to their registered address with Disney at the time of mailing. The kit includes instructions to enroll or decline coverage, and to enroll any eligible dependents. If salaried, the employee will receive an email with a link to the enrollment information.

Employees outside Hawaii are eligible to enroll in the Consumer Value medical plan option.

Please see Hawaii Employees and Cast Members Section for Hawaii Eligibility and plan options

- Currently enrolled employees receiving continuing coverage (prior to January 1, 2027) will be reset to participant only Consumer Value medical plan option when 2027 Annual Stability Period enrollment begins. This means any dependent elections you made for 2026 will not carry over. You will need to actively re-enroll eligible dependents or add new dependents for coverage effective January 1, 2027, by the enrollment deadline shown on the Personal Fact Sheet included in the enrollment kit.
 - Effective January 1, 2026, any newly eligible or new hire meeting their first anniversary on or after January 1, 2026, will need to make an active election to enroll into coverage. If they do not make an active election, they will default to “No Coverage Medical”.
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Employees with questions concerning their eligibility for medical coverage should call the **Disney Benefits Center** on **1-800-354-3970**.

ELIGIBILITY PROCESS

Measurement Period

- **How initial eligibility is determined (employees outside Hawaii)**

A newly hired employee with one year of service, no break in service longer than 91 days, and at least 1,560 ACA eligible hours during the 12-month period ending on the employee's anniversary date will receive an enrollment kit from the Disney Benefits Center. The employee has 31 days to enroll in or decline coverage. If no election is made, the employee will be assigned No Coverage Medical.

- **If the 1,560 hours requirement is not met during the first year**

After the first year, there will be an ongoing 12-month measurement period from October 6 of the prior year to October 5 of the current year. If they meet the ACA eligible hours requirement during one of these "ongoing measurement periods," their eligibility for coverage would be effective the following January.

PLEASE NOTE: Cast Members/Employees should not use the Hours Monitoring Report to track ACA eligible hours; these are calculated through specific SAP processes.

Stability Period

- **When coverage takes effect (following initial measurement)**

Coverage will begin effective on the last day of the month following the month of the employee's first year anniversary, if the employee has met the 1,560-hour requirement (or 20 hour/4-week requirement in Hawaii).

For example, if an employee was hired on February 15, 2025, and worked at least 1,560 ACA eligible hours as of February 15, 2026, coverage would begin effective March 31, 2026. This begins a 12-month "Stability Period" during which the employee is guaranteed to remain eligible for medical coverage whether they have a reduction in hours, end a project, or go on a leave of absence, as long as they remain employed with the Company.

FREQUENTLY ASKED QUESTIONS

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Hours Measurement and ACA Eligibility

Q1: What medical coverage does the ACA require?

A: The Affordable Care Act (ACA) requires employers to offer affordable medical coverage to eligible employees who average at least 30 hours per week during the defined look-back period from October 6 of the prior year through October 5 of the current year.

Q2: What hours are measured for 30 hours per week?

A: For non-full-time employees working and paid in the U.S., ACA eligible hours are measured through either the initial measurement period for new hires or the ongoing measurement period. All ACA eligible hours are calculated through a specific SAP process. Do not use the Hours Monitoring Report to calculate ACA eligible hours.

Q3: What is the measurement and eligibility process for ongoing employees and Cast Members?

A: Ongoing employees outside Hawaii who have more than one year of service are evaluated during the annual measurement period from October 6 of the prior year through October 5 of the current year. Employees with at least 1,560 ACA eligible hours during the 12-month period are eligible for Consumer Value medical coverage. Coverage is effective for the following calendar year, January 1 through December 31.



Q4: What medical benefits do employees receive after working at least 1,560 hours?

A: If hourly, the employee will receive an enrollment kit from the Disney Benefits Center mailed to the address in SAP at the time of mailing. If salaried, the employee will receive an email with a link to the enrollment information. The information describes Consumer Value or HMSA Health Plan Hawaii, as applicable, and includes instructions to enroll in or decline coverage and add eligible dependents. See *"Medical Coverage Notification and Details."*

Q5: What if an employee does not take any action on the enrollment kit they receive?

A: Currently enrolled employees receiving continuing coverage (prior to January 1, 2027) will be reset to participant only Consumer Value medical plan option when 2027 Annual Stability Period enrollment begins. This means any dependent elections you made for 2026 will not carry over. You will need to actively re-enroll eligible dependents or add new dependents for coverage effective January 1, 2027, by the enrollment deadline shown on the Personal Fact Sheet included in the enrollment kit. If you have elected No Coverage Medical in the prior year, no action is required.

New Hire Measurement and Eligibility – outside Hawaii

Q6: How long does coverage last?

A: If the non-full-time employee continues to meet the 1,560-hour requirement during subsequent ongoing measurement periods, their 12-month "Stability Period" will be on a calendar year basis and enrollment will closely align with the Annual Benefits Enrollment for active full-time employees.

Q7: When does medical coverage end if an employee or Cast Member does not meet the 1,560-hour requirement during a subsequent annual measurement period?

A: If an employee or Cast Member outside Hawaii does not meet the 1,560-hour requirement during a subsequent annual measurement period, coverage will end at the conclusion of the applicable stability period based on the calculated end date. The employee will then be offered the opportunity to continue Consumer Value coverage through COBRA at the employee's expense after ACA coverage terminates.

For example, if the non-full-time employee is eligible for one year of coverage ending Feb. 28, 2027, and does not have at least 1,560 ACA eligible hours when measured in the ongoing annual October 2027 standard measurement process, coverage ends on Feb. 28, 2027. They will then be offered the opportunity to continue Consumer Value coverage through COBRA effective March 1, 2027, at the employee's expense after ACA coverage terminates.

Hawaii Employees and Cast Members

Q8: How are Hawaii employees and Cast Members measured for medical coverage eligibility?

A: Hawaii non-full-time employees are evaluated through two separate processes: monitoring under Hawaii state medical coverage eligibility requirements and ACA eligible-hours measurement using the applicable 12-month look-back or new-hire process. See the eligibility section above for the Hawaii state-law requirements.

Q9: What medical coverage is offered to eligible Hawaii employees and Cast Members?

A: Eligible Hawaii employees and Cast Members may enroll themselves and their eligible dependents in HMSA Health Plan Hawaii. The employee will be enrolled in individual coverage unless they select “No Coverage Medical” and submit an HC-5 form to the Disney Benefits Center by the enrollment deadline. There is no cost for coverage for the employee or any eligible dependents they choose to cover.

Q10: What happens if the employee leaves Disney?

A: Eligibility for ACA coverage ends on the employee’s or Cast Member’s separation date. The individual will be offered the opportunity to continue Consumer Value or HMSA coverage through COBRA.

Rehired Cast Members

Q11: When are non-full-time rehires considered new hires?

A: A non-full-time rehire is treated as a new hire when the break in service is 92 days or more. If the break is 91 days or less, the individual is treated as an ongoing employee.

- **Break of 92 days or more:** ACA eligible hours are measured from the rehire date, with eligibility evaluated at the one-year anniversary.
- **Break of 91 days or less:** Prior ACA eligible hours within the applicable 12-month look-back period are included in the ongoing annual October measurement.

Q12: Is the non-full-time rehire eligible for benefits if they were in a prior Regular Full-Time status?

A: Yes. An employee rehired into non-full-time status within 91 days of separating from a regular full-time position may enroll in, change, or drop medical coverage for the rest of the calendar year. If no action is taken, the employee’s prior medical coverage is restored. Previously elected dental and vision coverage may continue through COBRA. For individual assistance, contact the Disney Benefits Center at 1-800-354-3970.

Q13: If the rehired employee enrolled in COBRA coverage before returning to Disney, can they elect to continue their coverage through COBRA?

A: Yes, as long as they continue to pay the required contributions for coverage for as long as they remain eligible for COBRA.

Changes in Status

Q14: Will non-full-time employees and Cast Members be offered conversion to regular full-time status if they have at least 1,560 or more ACA eligible hours?

A: No. Meeting the 1,560-hour threshold does not automatically convert an employee or Cast Member to full-time status. Discuss potential status changes with your leader.

Q15: What happens to benefits when a full-time employee or Cast Member changes to non-full-time status, including after a temporary full-time assignment?

A: When a full-time employee changes to non-full-time status, whether permanently or after a temporary full-time assignment, an employee enrolled in Disney benefits coverage will receive a letter from the Disney Benefits Center. Medical Continuation Coverage and employee payroll contributions will automatically continue through December 31. To change or decline medical coverage, the employee must go online or contact the Disney Benefits Center at 1-800-354-3970 within the stated 31-day enrollment period. Other coverage, such as dental, vision, and life insurance, will end, and the employee may be offered continuation through conversion or COBRA, as applicable.

Q16: If an employee or Cast Member changes from full-time to non-full-time status, including after a temporary full-time assignment, are prior full-time hours included?

A: Yes. All ACA eligible hours within the applicable 12-month look-back measurement period are included regardless of prior status, including hours worked during a temporary full-time assignment. The employee's ACA eligible hours will be evaluated during the ongoing annual October measurement period. The non-full-time employee may continue to be eligible for medical coverage unless measured ACA eligible hours fall below the 1,560-hour threshold.

Q17: If a regular non-full-time employee or Cast Member converts to full-time status for a temporary special assignment, what benefits are offered?

A: As a full-time employee, they will be eligible for full-time *Signature* benefits based on their job for the duration of the full-time work assignment, including all available medical plan options. If the employee is enrolled in ACA medical coverage, they will be offered the opportunity to enroll in the applicable full-time coverage. If hourly, the employee will receive an enrollment kit from the Disney Benefits Center mailed to the address in SAP at the time of mailing. If salaried, the employee will receive an email with a link to the enrollment information.

Salaried Exempt Regular Part Time

Q18: How are ACA eligible hours measured for Salaried Exempt non-full-time employees and Cast Members?

A: To receive credit for all ACA eligible hours worked for ACA eligibility, Salaried Exempt non-full-time employees should enter their weekly actual hours worked into their business unit's time

recording system (i.e. CATS or Kronos). The hours would be considered for ACA measurement purposes only and will not impact hours paid. **PLEASE NOTE:** When an employee enters their actual hours worked on a weekly basis, they must accurately reflect the hours worked for each week. Ongoing employees who are employed more than one year will be measured during the annual October standard measurement period based on the business unit's time recording system; new hires will be measured at their one-year service anniversary date. In addition, all ACA eligible hours during the 12-month look-back period will be included regardless of prior status (such as prior full-time ACA eligible hours before converting to the Salaried Exempt non-full-time position).

Leave of Absence (LOA)

Q19: For non-full-time employees and Cast Members who are on an approved Leave of Absence during the 12-month look-back period, are ACA eligible hours adjusted for LOA time?

A: Yes. Disney will evaluate any non-full-time employee with documented LOA time during the 12-month measurement period. The calculation evaluates any employees with ACA eligible hours worked in the range between 1,000 hours to 1,559 hours and determines if there are unreported hours due to documented leaves (Family Medical Leaves (FML), Maternity, Medical, Military and Jury Duty). For documented LOA time, up to 501 maximum hours may be granted for ACA measurement for non-full-time employees during the 12-month measurement period. Personal LOA time is not credited.

Other (International sites; Non-Employees; Multi-Employer Union Plans/Trust Fund)

Q20: Are international non-full-time employees included in ACA eligible-hours measurement and eligible for medical benefits?

A: No. International employees are not working in the U.S. and are therefore not subject to ACA eligibility requirements.

Q21: If a non-full-time employee or Cast Member transfers from an international work assignment to a U.S.-based position, are any prior hours worked included in the ACA eligible-hours measurement?

A: No. Hours worked outside the U.S. are excluded. The employee is measured as a new hire beginning on the hire or transfer date into the U.S.-based non-full-time position, with eligibility evaluated at the one-year anniversary.

Q22: Are non-employees, such as independent contractors, third-party operating participants, and vendors, included in ACA eligible-hours measurement and eligible for medical benefits?

A: No. Independent contractors, third-party operating participants, vendors, and other non-employees are not eligible for Disney benefits. Prior non-employee hours are excluded, and ACA measurement begins as a new hire on the date the individual becomes a Disney employee.

Q23: Are non-full-time employees or Cast Members covered by a multi-employer union plan or trust fund eligible for medical coverage?

A: No. Non-full-time employees and Cast Members who are covered by a multi-employer union plan or trust fund are not monitored for ACA eligible hours and are not eligible for medical benefits. Disney contributes to the employer plan on behalf of the employee. Please contact your union representative with questions.

Medical Coverage Notification and Details

Q24: How are employees and Cast Members notified that they are eligible for ACA medical coverage?

A: Once the employee meets the eligibility requirement for coverage (see page 1 on eligibility process), eligible employees or Cast Members will receive an enrollment kit advising that they have qualified to enroll in medical coverage and that they must actively enroll in or decline coverage for themselves and any eligible dependents. If hourly, the employee will receive an enrollment kit from the Disney Benefits Center mailed to the address in SAP at the time of mailing. If salaried, the employee will receive an email with a link to the enrollment information. If the employee does not respond, they will be automatically enrolled in No-Coverage Medical.

Q25: What coverage is offered to employees and Cast Members outside Hawaii?

A: Employees outside Hawaii are eligible to enroll themselves and their eligible dependents in the Consumer Value medical plan option. If the employee does not make an active election to enroll themselves and their dependents, they will be automatically enrolled in No Coverage Medical. Coverage will be for one year based on eligibility.

Q26: Can the employee cover dependents?

A: Yes. ACA-eligible employees may cover an eligible spouse or domestic partner and children up to age 26 at the applicable active rates. Dependents must be enrolled during the stated enrollment window or following a qualified life event.

It is your responsibility to provide accurate, complete, and up-to-date information about the dependent(s) you wish to be considered for eligibility. The Company periodically audits plan enrollments to make sure only eligible dependents are covered. Disney reserves the right to request documentation for any or all covered dependents.

Q27: What other benefits are non-full-time Cast Members eligible for?

A: All Disney employees, including employees and Cast Members who qualify for ACA medical coverage, are eligible for the Employee Assistance Program and Work-Life Caregiver Support as well as PerkSpot through our Voluntary Benefits Program.

Eligibility Footnote for Historical Purposes: Effective July 1, 2024, Student Program (College Program or Intern Program) participants will no longer be automatically eligible for ACA coverage upon extension of their program. Student Program participants will be evaluated on their first-year anniversary and, if applicable, annually thereafter.