2027 Coverage Scenarios Under Minnesota Paid Leave

As employers prepare for 2027 plan-year decisions, they may be evaluating whether to continue participating in the state plan or pursue an approved equivalent private plan. The chart below outlines common coverage scenarios and highlights key requirements, forms, and timing considerations based on currently available state guidance.

Employer's Situation for 2027	State Requirement/ Process	Key Forms or Submissions	Timing/Deadline
1. Newly joining the state plan	An employer coming under Minnesota Paid Leave uses the state program rather than obtaining an Equivalent Plan Substitution. The employer remains responsible for applicable wage reporting and premiums.	Employer/Paid Leave account setup and required employee notice. No Equivalent Plan Substitution application is needed simply to use the state program.	Employee notice rules generally require notice within **30 days of hire or 30 days before premium collection begins**. [mn.gov]
2. Staying/ "renewing" with the state plan for 2027	The Minnesota Dept. of Employment and Economic Development (DEED) does not specify a requirement for an annual state-plan renewal application. The employer simply continues participating and fulfilling its program obligations. For 2027, the statewide premium remains **0.88%**.	No annual state-plan renewal form is identified in the current DEED materials.	No annual renewal deadline identified. Normal reporting/ payment requirements continue. [mn.gov]
3. State plan → equivalent carrier private plan	Employer must obtain approval for an **Equivalent Plan Substitution**. For an insured arrangement, the underlying carrier product must be approved, and the employer submits its own substitution request through its Paid Leave Administrator Account. [revisor.mn.gov]	Carrier name, policy and plan numbers, coverage effective dates, **full insurance policy document**, certification/ attestation, and fee. The policy document must identify the organization using the plan.	DEED says the plan start date must be **the first day of a quarter** and coverage must run for a full year.
4. Equivalent carrier A → equivalent carrier B	This should be treated as a change to the employer's approved equivalent-plan arrangement rather than simply allowing the old policy to lapse. Statute requires DEED approval of amendments to an approved private plan. [revisor.mn.gov]	Updated carrier/policy information and plan documentation should be submitted through the Paid Leave equivalent-plan process. A private-plan amendment carries the applicable plan approval/ oversight fee. [revisor.mn.gov]	For an amendment, affected employees must receive notice **at least 10 days before the amendment is submitted**. The amendment becomes effective upon DEED approval unless a later date is agreed to. [revisor.mn.gov]
5. Renewing with the same equivalent carrier/ private plan	An approved private plan must initially remain in effect for at least one year and **thereafter continue** unless properly withdrawn. The statute does not specify a requirement for an employer to file a brand-new Equivalent Plan Substitution merely because the insurance policy reaches its annual renewal date. [revisor.mn.gov]	If there is **no change to the approved plan**, the statute does not establish an annual new substitution filing. If the renewal changes provisions of the approved plan, the amendment rules become relevant.	No general annual substitution-renewal deadline is stated in the cited statute. Amendments require the advance employee notice described above. [revisor.mn.gov]

Disclaimer: *The information is provided for general informational purposes only and reflects Minnesota Paid Leave requirements and guidance available as of the date of publication. Minnesota Paid Leave requirements, forms, procedures, deadlines, and interpretations may be revised or updated by the State of Minnesota. NIS/MNL/Alera strives to provide information consistent with current state requirements; however, employers remain responsible for confirming and complying with all applicable requirements. Employers should consult Minnesota Paid Leave directly and/or their legal or tax advisors regarding their specific circumstances.*

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