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Summary of Benefits and Coverage and Uniform Glossary

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General Comment

The notice requirement under B. Notice of Modifications, whereby "material modifications" would require notice "be provided to enrollees...no later than 60 days prior to the date on which such change will become effective" is unreasonable. As an individual who has had responsibility for managing a health plan covering over 6,000 lives, it is imperative to monitor the performance of the plan.

Given it takes a minimum of 30 - 60 days to explore modifications to a health plan to ensure continued affordability, combined with the the 30 days to develop and communicate such changes prior to the 60 day notice period, plan sponsors are left with only 7 months of experience to analyze overall performance; an amount of time most actuaries would consider insufficient to make any sound determinations.

Each renewal period, enrolled members must make decisions on affordability. With no end in sight to the high levels of medical inflation, it is imperative to provide group health plan sponsors as much time as possible to analyze plan performance to ensure continued viability of the plan through the offering of comprehensive, yet affordable, plan designs.