

PUBLIC SUBMISSION

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Uniform Disclosure to Consumers: Benefit Design, Cost Sharing, & Standards for Definitions

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Summary of Benefits and Coverage and Uniform Glossary

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OH

Submitter Information

Name: Gregg Gascon

Address:

Columbus, OH, 43216

Organization: Ohio Education Association

General Comment

The proposed rule could be improved by having the employer sign off on the new schedule of benefits stating that it comports with the schedule of benefits (for fully-insured plans) or summary plan description (for self-insured plans) and the certificate of coverage (for fully-insured plans) or summary plan document (for self-insured plans).

In addition, the document should also note that the primacy of the certificate of coverage or summary plan document is unchanged by the new schedule of benefits.