

From: [ZACH CRANE](#)
To: [E-OHPSCA2715.EBSA](#)
Subject: Summary of Benefit delay and revisions
Date: Thursday, October 13, 2011 1:57:56 PM

To whom it may concern,

I am asking for a delay in the effective date of the Summary of Benefits requirement until the first renewal after next year. There are a few main problems:

1. The Summary of Benefits template appears to fit fully insured plans well, but not self-funded plans which are the majority of those in the U.S. Employees will be under-served if they receive a summary that does not best capture their plan, be it self-funded or fully insured.
2. Definitions will differ between fully insured and self-funded plans.
3. While the fully insured carriers can easily convert their mass uniform plans to Summary form, that is not the case for the multitude of self-funded plans out there. Those will be custom re-works and will require significant time. The delay will allow you to finalize the requirements well in advance so SF plans can prepare.
4. It may be best to have two versions – one for FI, and one for SF. That way a participant doesn't get misled about what they have for coverage, and the SOB (name doesn't abbreviate well) will better reflect what the SPD says.
5. Finally, if we have the Summary of Benefits, you might want to consider eliminating the Summary Plan Description. It will be mass confusion for employees when they think they have one "Summary" that is complete only to find out that, "No, that's the other Summary. You needed this Summary to see the correct Summary."

Thanks for your consideration. Best of luck!

Regards,

Zach Crane

Benefits Account Manager

ph: 563.587.5295

800.793.5235 ext: 5295

fax: 563.587.5882

ZCrane@CottinghamButler.com

Cottingham & Butler

800 Main Street | PO Box 28

Dubuque, IA 52004-0028

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