

Cornerstone Preferred Resources

Employee Benefits Planning and Administration

October 19, 2011

Dear Department of Labor

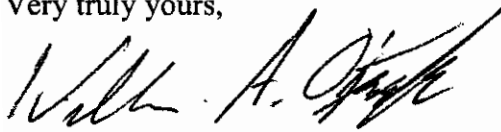
We are in the process of reviewing the new Summary of Benefits and Coverage (SBC) which becomes effective March 23, 2012 and would ask your consideration of the following:

- As a Third Party Administrator we administer self-funded plans for numerous employer clients covering thousands of employees and each plan has customized features, unlike the standard plans used by many insurance carriers. If a client has multiple plan offerings, which many do, the efforts for implementation is further compounded.
- The template is not user friendly for the Self-Funded Employer or our organization as the Third Party Administrator. Our clients will almost certainly assign responsibility for implementation of this process to us.
- The proposed Summary of Benefits template suggested by the NAIC reflects a fully-insured point of view and for participants who will be covered by a Self-Funded program, could lead them to believe that the program they are looking at is a Fully-Insured program, which it would not be. Providing a Self-Funded version of the summary would resolve this potential problem.
- The terminology used in Self-Funded programs is different than that used by insurance carriers for Fully-Insured Policies.

A delay of at least a year in the effective date of the Summary of Benefits would provide the time and opportunity to improve compliance with changes that will fit Self-Funded Benefit Plans.

Thank you for your consideration and we look forward to a positive response.

Very truly yours,



William A. O'Keefe, CEO
Cornerstone Preferred Resources

