

From: [Andrea Gambardella](#)
To: [E-OHPSCA2715.EBSA](#)
Subject: Summary of Benefits for Self Funded Health Plans
Date: Tuesday, October 18, 2011 8:48:27 AM
Attachments: [Sample SBC.docx](#)

Dear Department of Labor:

As a TPA located in CT for over 35 years we are doing our best to comply with all the new requirements of PPACA on behalf of our self funded clients. At times this can be quite challenging and labor intensive, however we continue to ensure our clients and their associated health plans remain compliant with health care reform.

Most recently we are having difficulties, translating a self-funded plan on to the Summary of Benefits Coverage (SBC). Much of the fully insured terminology utilized does not apply to self funded plans, or requires further explanation. For example:

<u>Fully Insured</u>	<u>Self Funded</u>
Insurance Company	Health Plan /Plan Sponsor
Policy	Summary Plan Description
Individual /Spouse	Single/Dual/ Family
Premium	Employee Contribution
Balance Billing	Usual, Reasonable, Customary

Further, the template is difficult to complete when there are dollar maximums, visit limits or tiered level of payments for a specific benefit. Each self-funded client has the ability to customize the benefits provided, allowing for hundreds of variations of what would need to be completed. It is also very common for our clients to have multiple unique plan options such as various HDHP and PPO designs.

Rather than the complex examples provided to demonstrate how medical services may be covered, it may be better to demonstrate for self-funded plans the difference between services being paid in-network vs. out of network. In self funding, it is nearly impossible to reflect allowed amounts for services that would apply to the majority of the population. The network contracts are provider specific and vary depending upon economic area and provider specialty. Education on the Identification Card and the PPO network utilized would also prove to be beneficial.

We feel that to proceed with the template provided would cause greater confusion and mislead the participant into believing they have a fully insured program. It is our hope that you will consider creating a separate template for self-funded, taking into consideration our suggestions. Attached is our attempt to modify the template for a self-funded case. We are sure this can also be improved.

We look forward to a positive response to our suggestions.

Sincerely,

Andrea Gambardella
Andrea Gambardella
Group Administration Manager
Stirling Benefits, Inc.

20 Armory Lane
Milford, CT 06460

Phone: (203) 647-0621

Toll Free: (800) 447-6689 Ext. 121

Fax: (203) 647-0695

www.stirlingbenefits.com

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