

October 3, 2011

Office of Health Plan Standards and Compliance Assistance
Employee Benefits Security Administration
Room N-5653
U.S. Department of Labor
200 Constitution Avenue NW.
Washington, DC 20210

Re: Patient Protection and Affordable Care Act; Summary of Benefits and Coverage and Uniform Glossary; RIN: 1210-AB52

On behalf of Kelly & Associates Insurance Group, Inc, we appreciate the opportunity to provide comments regarding the Proposed Rule on Summary of Benefits and Coverage and Uniform Glossary.

Kelly & Associates Insurance Group, Inc. (KELLY) is an administrator, broker and consulting firm that specializes in health care with over 13,000 clients. Many of our 13,000 clients are self funded and will have to complete these templates themselves as the carrier will not be providing. We have a few concerns in regards to the template and how more guidance or changes may need to be made. Our concerns are as follows:

- 1) We believe there will be much difficulty with keeping this summary to four sheets. Many of our clients have plans that are set up where there are certain sections or benefits that have day limits and different co-insurance depending on the days. To add that information into the template bumps everything down, creating more pages. Also according to the directions there is certain benefit information that needs to stay on certain pages.
- 2) The coverage example page (page five of template): We believe it is going to be very hard and not very accurate if the government doesn't provide groups the parameters. For example for the cancer treatment: How many visits vs. procedures? When it says pharmacy, how many are generic, how many are specialty?? Is the Chemo at the hospital or physician's office?? This can really be different depending on a group's plan. It would be helpful if groups were given the number of visits and more detail with the dollar amounts already posted on the template. It states in the directions that carriers are going to be provided information to help them fill this section out. Would this information contain the answers to the questions above? If so, this would also need to be shared with self-funded groups and administrators that will be helping them fill this template out.
- 3) Also in the instructions it says to use Times New Roman, we noticed that the sample WORD document online is all in Garamond.

In conclusion, we feel that trying to place a self-funded plan into this template is going to be very difficult. Most of the self-funded plans are not "cookie cutter" plans and can

contain a variety of benefits that would be hard to list in this template and still keep it to four pages. We also feel that more guidance would be needed to accurately present the coverage examples found on page five of the template.

Again, we appreciate the opportunity to comment on the proposed template and regulations.

Sincerely,

Sanford K. Walters
Executive Vice President - Kelly & Associates Insurance Group, Inc.
President - Kelly Administrative Services