

From: [Becca Hake](#)
To: [E-OHPSCA2715.EBSA](#)
Subject: Comments on proposed SBC rules
Date: Thursday, October 06, 2011 5:22:49 PM

In response to your request for comments:

We are a TPA that is already struggling with the avalanche of requirements and timelines that came with Health Reform. Adding the SBC is just one more costly piece of paperwork that is going to be near impossible to fit into four (4-doublesided) pages and then will be repeating nearly everything that is already provided to insureds. It will be one more set of papers that the insureds will still not read and toss aside. The cost is hard enough on companies who already have to comply with many costly changes in the last few years and upcoming years. But then the timeline is also making it almost impossible to comply. How are we to have this all in place by March if the final rules have not even been issued yet?

We also have a real concern about the language requirement that has now been changed to counties rather than companies. This causes us a hardship. Based on companies we would not come anywhere near the 10% on any of our many groups, but going by county, we will have to provide this for almost everyone of them now. How is this fair when our insureds actually do all speak English as primary language?

These are our main concerns, we really believe the SBC should:

1. Be scrapped or
2. Be expanded to more than 4 pages
3. timeline must be stretched out if you want full compliance from companies who are struggling to keep their heads above water with all the new regulations on top of HIPAA and ERISA....