

**From:** [Terry Smith](#)  
**To:** [E-OHPSCA2715.EBSA](#)  
**Subject:** Summary of Benefits Disclosure Requirements  
**Date:** Wednesday, October 12, 2011 3:09:30 PM

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Dear Reader:

We are a third party administrator who administers self-funded plans for employer clients. We have reviewed the template for the Summary of Benefits Disclosure Requirements and shared it with several clients. We find that it does not fit our clients' needs to properly and clearly communicate benefit coverage to their covered employees and dependents. In fact, everyone thought that it created more confusion than the current communication pieces used.

The template is not fit for self-funded plans and uses terminology that would confuse and mislead the reader. We also are concerned with our ability and our client's ability to meet the March 23<sup>rd</sup> deadline. Preparing these requires a customized approach for each client during a time period when renewal activities are their heaviest and other aspects of health reform are taking significant time and resources. We ask for a delay in implementing these requirements.

Thanks you for your consideration.

***Terry Smith***



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