

From: [Rob Valerious](#)
To: [E-OHPSCA2715.EBSA](#)
Subject: The Summary of Benefits Requirement
Date: Thursday, October 13, 2011 8:43:39 AM
Attachments: [1_Warning.txt](#)

Dear Department of Labor:

ACA requirements have caused our company to spend over \$350,000 in re-drafting plan documents on behalf of our clients and members over the last 18 months. The fast approaching compliance date of March 23, 2012 presents us with both a costly and unrealistic compliance deadline given the current regulations.

With several key issues unresolved, we are requesting a delay in the effective date of the Summary of Benefits requirement for at least a year. Further, we believe that the requirement should be applicable only at renewal of the group.

Of note:

- 1. These requirements have been created for plans that are fully insured. They are not designed to accommodate plans that are self insured.*
- 2. The terminology used within the draft document is not consists with the terminology used by plans that are self funded.*
- 3. The proposed template does not accommodate plans that are self funded and will cause confusion at the member level.*
- 4. This requirement will force Allied to draft literally hundreds of custom documents to reflect the uniqueness of each of our clients plans.*

We thank you for your consideration and ask that you give us the time and opportunity to improve compliance with the changes that fit self-funded benefit plans.

Best Regards,

Rob Valerious

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