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Subject: Comments on Summary of Benefits and Coverage
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Attachments: [image001.png](#)

The proposed rule requires that a Summary of Benefits and Coverage be provided 30 days prior to the reissuance or renewal of a policy. Today many small employers don't determine their benefit offering in a timely enough fashion to provide these summaries 30 days in advance of renewal. Compliance with this rule will be difficult given employers have no set time frame upon which to make their decision on the benefit plan they intend to offer.

We would recommend that this rule be modified to allow the insurer a minimum of 10 business days from the date upon which the employer accepts coverage to provide such summary.

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