From:
 Kerry McCormack

 To:
 E-OHPSCA2715.EBSA

Subject: Rule making for Summary of Benefits and Coverage

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Under current regulation, the summary of benefits, summary plan document and complete plan document are provided to employees covered under an employer group health plan. Requiring these plans to design and provide an additional summary which provides the same information in another template is redundant and a waste of time and dollars.

If the concern is for communication from self-funded plans, or from providers of group coverage as supported by state mandated pools, then rewrite the rule to specify the required plans and do not broadly apply it to plans already required to provide this information.

Kerry McCormack
Human Resources Business Partner



Direct Line (781)457-9262

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