

From: [Philip Zimmerman](#)
To: [E-OHPSCA2715.EBSA](#)
Subject: RIN 1210-AB52
Date: Tuesday, September 27, 2011 2:26:05 PM

Ladies and Gentlemen,

We appreciate this opportunity to comment on the proposed regulations applicable to group health insurance plans and health insurance issuers relating to summary of benefits requirement under the Patient Protection and Affordable Care Act. For your information, Everence Financial is an agency of Mennonite Church USA and intentionally serves 26 denominations within the Anabaptist religious traditions. Through through a variety of affiliated entities including Everence Association, Inc., a religious fraternal benefit society, we provide individual health insurance in twenty-two states and small group health insurance in nine states. We also serve as a third party administrator for large self funded employers with specific support for multiple church denominations and agencies.

As a health insurance provider, we are expected to play a significant role in controlling administrative costs of providing health insurance while meeting the needs of our members. It is within that perspective that we offer the following comment in response to proposed rules for providing a standardized Summary of Benefits as set forth in proposed regulation titled "Summary of Benefits and Coverage and Uniform Glossary.

We support government efforts to require health insurers and health plans to disclose certain information regarding the health coverage they offer. We believe this approach allows the consumer to make an educated decision about the health insurance coverage they wish to purchase and be adequately informed as to how their health insurance plan operates. Our concern is the template disclosure approach used by the proposed regulations. The various health plans offered by Everence Financial contain a multitude of different plan variations. We believe that the template required under the proposed regulation will not adequately disclose all the plan variations that the consumer needs to be aware of in order to make an informed decision. In fact, we believe that the proposed template may in fact confuse the consumer rather than educate them because not all relevant plan variations are fully explain. The problem as we see it is that the template requires us to force "a square plug into a round hole" meaning that we feel that we are being forced to attempt to fit our plan variations into a template that does not adequately explain the plan variations as needed. Accordingly, we are suggesting that the regulation should require health plans and health insurers to meet certain disclosure standards as opposed to complying with a specific template. This would allow health insurers and health plans some flexibility in terms of meeting their disclosure obligations within the framework of articulated standards.

As always, one of the challenges facing regulated entities such as health insurers and health plans is to comply with regulations in a manner that is financially responsible. We believe that the standards approach would achieve the stated objectives of the regulation in informing the consumer while allowing health insurers and health plans some flexibility in implementing the regulation in a matter that is cost effective. We think there are other examples of regulatory approaches that have used the standards approach. For example, we believe the HIPAA privacy

notice regulations utilized this approach. One of the main products that we offer is a high deductible health plan offered in conjunction with a health savings account. In a trial implementation, we have attempted to utilize the proposed template in conjunction with our high deductible health plan and a health savings account. We found it very difficult to fit the important and relevant data into the proposed template in a manner that was cost-effective and not confusing to the consumer. Simply stated, we do not believe that the template adequately and fully explain the operation of a high deductible health plan offered in conjunction with a health savings account.

In conclusion, we are requesting that the regulation be revised utilizing a disclosure standards approach rather than a disclosure template approach as currently proposed.

Thank you for your consideration.

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