

# PUBLIC SUBMISSION

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**Docket:** CMS-2011-0140

Uniform Disclosure to Consumers: Benefit Design, Cost Sharing, & Standards for Definitions

**Comment On:** CMS-2011-0140-0002

Summary of Benefits and Coverage and Uniform Glossary

**Document:** CMS-2011-0140-0005

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## Submitter Information

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### General Comment

Every carrier should be assigned a range of numbers that must be used to identify the health plans that are being sold through and exchange. This will make it easier for users to communicate about a plan and preclude the need for carriers to send an SBC if only the premium is changing as the user could quickly find the benefit description for their plan on the web based on the assigned number.

If there are substantive benefit changes, or changes to out of pocket costs, these changes should be highlighted in any subsequent SBC notice for ease of identification. Benefits that are being added (i.e. extension of coverage to age 26) or deleted without a change in premium or out of pocket costs should not require generation of a new SBC, but accomplished via a limited notice. Again, the user can view the corrected plan detail on the web, using the plan number assigned.

Persons without web access would receive a full SBC.