PUBLIC SUBMISSION

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

Comment On: CMS-2011-0140-0001

Summary of Benefits and Coverage and Uniform Glossary: Templates, Instructions, and Related Materials under Public Health Service Act

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General Comment

I've been working on this form for two days. When I put detail in according to the directions I feel as if I'm watering down the information that is already in the SPD for the client. We could actually do more good by defining the terms (which have been around for years) that the government is concerned with (co pay deductible) and reference back to the LEGAL plan document. Then perhaps the four pages would actually be four pages AND, I won't feel like I'm giving the employee half the story.

The fact is we have websites, 800 numbers, HR professionals that know their stuff - we need to encourage discussion. From experience, I've found employees learn more from fellow employees than all the printed material we throw at them.

Regards,

S. Woodiwiss