

From: [Dave Follansbee](#)
To: [E-OHPSCA2715.EBSA](#)
Cc: [Karen Brower](#); [Laura Reska](#)
Subject: Four Page Summary of Benefits
Date: Thursday, October 20, 2011 2:01:46 PM

Dear Department of Labor,

I am Vice President of Operations for a Connecticut based company (Diversified Administration Corporation, that provide Third Party Administration (TPA) services for 120 small to mid-size single employer, self funded group health plans. These plans cover over 30,000 members. This email provides some additional concerns we have with the new Four Page Summary of Benefits (SBC).

Below are some additional concerns/questions/comments we have on the proposed regulations:

- It is not clear in the Sample SBC if more than one PPO Network can be included in the same SOB (assuming that the benefit structure and coverage tier are the same) . It would reduce the number of SBC versions a self-funded employer would need prepared if multiple PPO choices could be included in a single SOB.
- Can a self-funded plan use terminology such as PPO and Non PPO rather than In Network/Out of Network or Preferred/Non Preferred? We feel that if the terminology is not similar to the SBC, ID Cards and other Plan materials, it could be confusing to Members.
- We feel it would be helpful for the Department to clearly define what is meant by "long term care"? Is this custodial care or help with daily activities of living?
- it would be helpful if the Department provide sample SBCs or additional guidance on how to handle HRAs, Dental and Vision benefits that are integrated into the Group Health Plan.
- Under Coverage examples – if baby charges are not covered under the mother's claim, but under their their own separate deductible and coinsurance, how would this be handled in the Coverage example/.

Thank you for your kind consideration on these issues,

Sincerely,

David M. Follansbee
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