

Annual Health & Welfare Plans Disclosure Requirements for 2016

Notice	Explanation	Entity Responsible	Frequency	Applicable Document
Summary of Benefits and Coverage (SBC)	Four-page uniform description of benefits available at open enrollment. Anthem will provide SBC, banks must distribute to eligible employees. Follow the same distribution guidelines as SPDs. Electronic distribution is acceptable within specific parameters. Paper copy must be available upon request.	VBA will provide SBCs to bank; Bank will distribute/post to employees	Annual	During open enrollment period; first day of plan year (for newly eligible)
Patient Protection Disclosures	Participants may select any participating provider available to accept them as a patient. A child may elect a provider specializing in pediatric care. Obstetrical or gynecological care may be obtained without a referral or prior authorization.	Anthem	Not defined as annual distribution; must be included with a SPD or other similar description of benefits; OE suggested	Provided in booklet/SPD.
HIPAA Special Enrollment and Pre-existing Condition Exclusion Notices	Eligible participants must receive notice of special enrollment rights. Pre-existing condition not applicable to VBA plan.	Bank	Annually	Included in Anthem booklet in section labeled, "When You Enroll".
Women's Health and Cancer Rights Act (WHCRA) Notice	Requires annual notice to all participants and beneficiaries regarding rights to post-mastectomy breast reconstruction. One notice at initial enrollment, annually thereafter.	Anthem	Annually	Provided by Anthem with ID cards for initial enrollment requirement; language included in booklet for annual notice.
Medicare Part D Creditable (or Non-Creditable) Coverage Notice	Employer must provide notice if prescription drug coverage is creditable (i.e. at least actuarially equivalent to Medicare's standard Rx benefit). Required recipients are Part D-eligibles who are "enrolled or seeking to enroll" in the employer's plan.	Bank	Annually and at several other times	Typically included with open enrollment materials. Available on VBA website.

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Children's Health Insurance Program (CHIP) Notices	Applicable in a state that provides a premium assistance subsidy under Medicaid or CHIP. Must provide in VA.	Bank	Annually	Distributed at annual open enrollment; must be presented as a separate and prominent" document; available on VBA website
Wellness Program Notices	If a wellness program requires individuals to meet a standard related to a health factor in order to obtain a reward, the HIPAA nondiscrimination rules require the program to comply with five conditions, including a disclosure requirement.	May apply based on individual banks' specific wellness plans, if outcomes-based incentives		
Summary Annual Report (SAR)	Must be distributed within nine months after the close of each plan year. If an extension is filed for the plan's Form 5500, the SAR deadline is also extended.	VBA provides to bank; bank must distribute	Annually	VBA provides SAR to bank with all plans offered, bank must customize to specific benefits offered. Distribution is dependent on each bank.

DISCLOSURE REQUIREMENTS FULFILLED (IN PART) BY ANNUAL NOTICES

Notice	Entity Responsible	Frequency
Initial COBRA QE Notice	FBA	Within 90 days of EE enrollment
HIPAA Notice of Privacy Practices	Bank	Given to new participants and redistributed if revised. Reminder must be distributed every three years regarding availability of detailed description. Available on VBA website.
Summary Plan Description (SPD)/Summary of Material Modification (SMM)	Bank	As of 2015, customized SPDs were distributed to member banks; VBA will update each year based on new plan offerings. Booklet-certificates are provided on VBA website. Employees must receive SPD within 90 days of EE enrollment and again every five years; SMM-210 days after effective date of change.