

## Distribution Instructions

### *Summary of Benefits and Coverage (Summary)*

*Do well. Do right.®*

A provision of the health care reform law requires all health plan sponsors to provide a uniform summary of benefits to participants. Accordingly, as an employer offering group health plans, you are required to distribute the *Summary of Benefits and Coverage (Summary)* to your employees. This instructional guide will help you know when and to whom you need to send Summaries.

**You must provide Summaries every time a triggering event happens.** Log on to Employer Access to find the Summaries for the plans you currently offer. Or visit [GuideStone.org/Summaries](http://GuideStone.org/Summaries) to access all Summaries.

Triggering event	What you need to do	When you need to act
<b>An employee becomes eligible for medical coverage or you hire a new employee eligible for medical coverage.</b>	Distribute Summaries for all the health plans you offer to employees in the same class.	Provide Summaries with your enrollment packet so your employee has the Summary by the first day of medical coverage.
<b>An employee or dependent is considered a “special enrollee” or has a special enrollment event that makes him or her eligible for medical coverage.</b>	Distribute the Summary for the plan your employee will be in after the special enrollment event (may be a new plan).	Provide the Summary within 90 days of the enrollment or within seven business days of employee request.
<b>An employee requests a Summary.</b>	Distribute the Summary the employee requested.	Provide the Summary to the employee within seven business days of the request.
<b>An employee requests the glossary.</b>	Distribute the glossary.	Provide the glossary to the employee within seven business days of the request.
<b>Your employees re-enroll annually in your group health plans.</b>	Distribute the Summaries to employees for the plan they are currently enrolled in.  If you eliminate a plan option during re-enrollment, distribute the Summary for the new plan to all employees enrolled in the closed plan.	Provide Summaries to employees at least 30 days before the start of your plan year.  If, during this 30-day window, you change the plan options you make available, you must provide Summaries to employees within seven business days.
<b>Your group health plan is materially modified.</b>	GuideStone will notify you if we make a material modification of the plan you offer and will provide you with new Summaries.	Provide the Summaries at least 60 days before the change is effective to your employees enrolled in that plan. For GuideStone plans, changes are typically effective January 1 and will be included in your renewal materials.

## It's important to comply with health care reform:

- **Printed copies:**
  - You must distribute printed copies of Summaries directly to each individual employee.
  - Placing Summaries in a common area does not satisfy Department of Labor (DOL) requirements.
  - You must print double-sided to meet DOL guidelines.
  - You should print in grayscale but are allowed to print the DOL blue color.
- **Electronic copies:** You must meet DOL criteria to distribute Summaries electronically. If you do not meet DOL criteria, you must provide printed copies. However, if an employee requests a Summary electronically, you can reply and attach the Summary with the required DOL statement. The DOL criteria for electronic copies and statement are provided below.
- **Special enrollment event:** At every special enrollment event (such as adding a newborn), you must provide the required Summary.
- **Retired employees:** Retirees on Medicare-coordinating plans are not included in the Summary mandate, so you do not need to provide Summaries to retirees on your Medicare-coordinating plans.
- **Plan combinations:** There are infrequent instances when an employee and his or her spouse are on different health plans. In such cases, you must provide each person with the appropriate Summary for their plan coverage.
- **Summaries in Spanish:** If an employee requests a Summary in Spanish, contact your GuideStone representative immediately. We will provide you with the appropriate language-specific Summary. It's important to notify us right away because there are additional steps involved, and you must provide the Summary within seven business days of the request.

## DOL criteria for electronic copies

Currently, DOL rules allow employers to distribute Summaries electronically if employers meet certain criteria. You must meet the criteria below to distribute Summaries electronically to an employee. Summaries must be distributed to all employees. Certain classes of employees, such as the janitorial staff and/or daycare workers, will likely not meet the criteria below. If any of the criteria below is not met for an employee, you must provide that employee with printed copies of Summaries.

- Your employee must use your email system as an integral part of his or her job to be eligible to receive electronic copies.
  - If an employee does not use your email system as an integral part of his or her job, he or she is not eligible to receive electronic copies and you must provide printed copies.
- Your email system must confirm emails with delivery receipts (e.g., read receipts and/or undeliverable messages).
- You must protect employees' confidentiality by restricting access to emails.
- You are not allowed to change the DOL-mandated format of the Summary.
- You must forward the Summary with a statement that explains the Summary's significance and the employee's right to a paper copy. You may use the following statement:

**“The *Summary of Benefits and Coverage* was created to help consumers more easily compare plans and understand their insurance benefits. You may also request a printed copy at any time.”**

For specific DOL criteria and rules, please read the DOL's publication *29 CFR 2520.104b-1* or visit [dol.gov/ebsa/regs/fedreg/final/2002008499.pdf](http://dol.gov/ebsa/regs/fedreg/final/2002008499.pdf).

To access Summaries and/or the glossary, log on to Employer Access, visit [GuideStone.org/Summaries](http://GuideStone.org/Summaries) or contact your GuideStone representative.