

# DISTRIBUTION INSTRUCTIONS

## Summary of Benefits and Coverage (Summary)

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 into GuideStone Employer Access® to find the Summaries for the plans you currently offer. Or visit [GuideStone.org/Summaries](https://www.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.	Provide the Summary to employees during re-enrollment.
<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.

## Guidelines for Complying 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 his or her 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 Electronic Notice Criteria

Please consult the specific DOL criteria and rules at [29 CFR Part 2520.104b-1](#). Generally, the DOL allows electronic distribution of these forms if the forms are prepared and furnished in a manner to ensure actual receipt by the employees (all participants in the health plan). The DOL requires that:

- Your system for furnishing the form must result in actual receipt of the form, and you should periodically confirm the delivery of the forms (e.g., using return receipts, identifying undeliverable messages or otherwise confirming receipt of transmitted information).
- You must protect the employee's confidentiality by incorporating into your electronic information system measures designed to preclude unauthorized receipt of or access to the employee's information.
- For forms provided in a DOL-mandated format (e.g., the Summary), you are not permitted to change the format.
- You must forward the form with a statement that explains the document's significance and the employee's right to a paper copy.

Electronic distribution can be made to employees with work-related computer access and employees who have affirmatively consented to receive electronic notices. Specifically, provided the above criteria are met:

- You may make an electronic disclosure to an employee who has the ability to access documents at any location where the employee reasonably could be expected to perform employment duties and whose access to your electronic information system is an integral part of those employment duties.
- You may make an electronic disclosure to an employee who does not have work-related computer access only if you receive affirmative consent from that employee. Note that the DOL requires specific, detailed consent for disclosures made over the internet or other electronic communication network. Generally, prior to consenting, the employee must be given a clear and conspicuous statement describing the processes for giving consent, withdrawing consent and accessing forms in the future. Additionally, if you change your software or hardware requirements for accessing these forms, you must provide a new statement and request new consent from the employee.

For specific DOL criteria and rules, please read the DOL's publication [29 CFR Part 2520.104b-1](#).

Employers who determine they satisfy the DOL requirements for electronic delivery of required Summaries must include the required DOL statement provided below:

**“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.”**