



TOPIC: **Draft Comments on Excepted (Wrap) Benefits Coverage**

**EXECUTIVE SUMMARY:** THE DEPARTMENTS OF LABOR, HEALTH AND HUMAN SERVICES AND TREASURY RECENTLY ISSUED A NOTICE OF PROPOSED RULE MAKING (NPRM) REGARDING AMENDMENTS EXPANDING THE DEFINITION OF “EXCEPTED BENEFITS” WHICH WOULD PROVIDE THE BASIS FOR PROVIDING “WRAP” COVERAGE THAT COULD SUPPLEMENT INDIVIDUAL COVERAGE OFFERED ON THE EXCHANGE WITHOUT JEOPARDIZING AN INDIVIDUAL’S ELIGIBILITY TO ACCESS PREMIUM TAX SUBSIDIZED COVERAGE ON AN EXCHANGE. AS PROPOSED, THE RULES INCLUDE SEVERAL RESTRICTIONS THAT, WITHOUT AMENDMENT, WILL SEVERELY RESTRICT THE NUMBER AND TYPES OF PLANS AND PARTICIPANTS THAT WILL BE ABLE TO AVAIL THEMSELVES OF THIS ALTERNATIVE. THIS ISSUE OF **MULTI-ELERT** INCLUDES OUR DRAFT RESPONSE TO THE PROPOSED RULES WHICH SUGGESTS MODIFICATIONS THAT COULD EXPAND SUCH COVERAGE AND REQUESTS YOUR INPUT ON HOW THESE COMMENTS MAY BE IMPROVED PRIOR TO FINAL SUBMISSION.

**These comments will be discussed on a conference call to be held:**

**Friday, February 21, 2014 at 1:00 pm Eastern time**

**Call In Number: 1 (877) 229-9594**

**Access Code: 2027564644#**

PURPOSE: **REQUEST FOR COMMENTS**

CATEGORY: **HEALTH AND WELFARE**

ISSUER: **DOL, HHS AND TREASURY DEPARTMENTS**

TARGET AUDIENCE: **BOARDS OF TRUSTEES AND PROFESSIONAL ADVISORS**

INPUT REQUESTED: **COMMENTS ON DRAFT RESPONSE TO NPRM**

OFFICIAL COMMENT PERIOD ENDS: **MONDAY, FEBRUARY 24, 2014**

NCCMP DEADLINE: **FRIDAY, FEBRUARY 21, 2014**

FORWARD COMMENTS TO: **[Multi-Elert@nccmp.org](mailto:Multi-Elert@nccmp.org)**

REFERENCE: **VOL. XIV, ISSUE 1,**

FOR ADDITIONAL BACKGROUND SEE: **78 Fed Reg 77632 (Dec. 24, 2013)**

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*We strive to ensure that the information contained in this and every issue of Multi-Elert is correct to the extent information is available. Nevertheless, the NCCMP does not offer legal advice. Plan fiduciaries should rely on their own attorneys and other professional advisors for advice on the meaning and application of any Federal laws or regulations to their plans.*

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*If you have questions about the NCCMP, or about this or other issues of Multi-Elert, please contact the NCCMP, by phone at (202) 737-5315 or by e-mail at [nccmp@nccmp.org](mailto:nccmp@nccmp.org).*

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