

## Health and Welfare Annual Notices

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November 1, 2013

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As open enrollment approaches for many group health plans, it is important to ensure that the plan has distributed certain required annual notices to its participants and their beneficiaries. In many cases, inclusion of such notices in the plan's annual enrollment materials will satisfy these notice requirements. The following non-exhaustive list describes the various notices that group health plans must distribute annually.

- Summary Annual Reports.
- Summary of Benefits and Coverage.
- Health Insurance Portability and Accountability Act (HIPAA) Notice of Privacy Practices (updated for the new privacy regulations effective as of September 23, 2013).
- HIPAA Special Enrollment Notice.
- Women's Health and Cancer Rights Act Notice.
- Medicare Part D Notice of Creditable or Non-Creditable Coverage (required prior to October 15).
- Child Health Insurance Program Reauthorization Act Notice.
- Patient Protection and Affordable Care Act Exchange Notice (required by October 1, 2013 and, for any employee hired after that date, within 14 days of the employee's date of hire).

While some of these notices must be distributed separately, many may also be included in the plan's Summary Plan Description (SPD). However, if the plan does not distribute its SPD annually to all participants and beneficiaries, including the notices in the SPD alone will not satisfy the plan's annual notice obligations.