

From: Andrew R. Dietrich [adietrich@slevinhart.com]

Sent: Thursday, January 27, 2011 7:34 PM

To: Moultrie, Cam (HHS/OCIIO)

Cc: Habit, Sandra (HHS/OCIIO); Allison A. Madan; sherring@cic-ubc.org; rick@crmsinc.org; Martha.Feazell@wellsfargo.com; Donna.Asbury@wellsfargo.com; CDYOUNG@GAPAC.com

Subject: RE: Waiver Application for Carpenters Industrial Council Trust Fund

Ms. Moultrie: As you know, we are counsel to the Carpenters Industrial Council Trust Fund ("Fund"). This supplements my email below. Based on information currently available to the Fund, the effective date and expiration date for the following applicable collective bargaining agreement ("CBA") is as follows:

- [Plan 68](#). 11/1/2010 - 10/31/2013

Please feel free to contact me with any additional questions.

Andrew R. Dietrich

Attorney at Law

Slevin & Hart, P.C.

1625 Massachusetts Ave., N.W., Suite 450

Washington, D.C. 20036

202-797-8700 Tel

202-234-8231 Fax

adietrich@slevinhart.com

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From: Andrew R. Dietrich

Sent: Wednesday, January 26, 2011 2:25 PM

To: cam.moultrie@hhs.gov

Cc: Sandra.Habit@hhs.gov; Allison A. Madan; 'sherring@cic-ubc.org'; 'rick@crmsinc.org'; 'Martha.Feazell@wellsfargo.com'; 'Donna.Asbury@wellsfargo.com'; CDYOUNG@GAPAC.com

Subject: RE: Waiver Application for Carpenters Industrial Council Trust Fund

Ms. Moultrie:

We are counsel to the Carpenters Industrial Council Trust Fund ("Fund"). This responds to your email below requesting additional information regarding the Fund's application for waiver of the annual limits requirements of the Public Health Service Act ("PHS Act") Section 2711 as applicable to various plans of benefits ("Plans") provided by the Fund.

I. The Fund was in existence prior to March 23, 2010. It is the Fund's understanding that the Plans identified in the waiver application meet the requirements of a "grandfathered plan," as that term is used in applicable regulations. The Fund is prepared to comply with the PPACA requirements applicable to grandfathered plans with respect to these Plans, effective February 1, 2011. However, if the Fund's waiver application is not granted, potential increases in participant cost-sharing could impact a particular Plan's ability to maintain grandfathered status. As indicated in the enclosed PDF attach , which was previously provided with the Fund's waiver application, the Fund's benefit consultant estimates there would be a (b)(4) funding shortfall for each Plan that cannot satisfy the grandfathered status requirements in 2011 and such a loss of grandf d status would likely result in additional projected rate increases and participant cost-sharing not reflected in the spreadsheet.

II. Based on information currently available to the Fund, the effective dates and expiration dates for the applicable collective

CARP IND:000001

bargaining agreements ("CBAs") are as follows:

- [Plan 3.](#) 3/3/2010 - 2/2/2013
- [Plans 4 and 41.](#) 11/30/2010 - 11/30/2011
- [Plans 6 and 7.](#) 9/1/2010 - 8/31/2014
- [Plan 10.](#) 1/1/2010 - 12/31/2013
- [Plan 12.](#) 11/1/2009 - 10/31/2013
- [Plan 21.](#) 3/23/2008 - 3/31/2011
- [Plan 24.](#) 3/5/2006 - 3/5/2011
- [Plans 45 and 50.](#) 10/1/2009 - 9/30/2013
- [Plan 52.](#) 6/1/2009 - 5/31/2013
- [Plan 53.](#) 6/1/2009 - 5/31/2013
- [Plan 54.](#) 10/28/2009 - 5/31/2013
- [Plan 55.](#) 6/1/2009 - 5/31/2013
- [Plan 58.](#) 12/1/2007 - 11/30/2011
- [Plan 59.](#) 11/30/2007 - 11/30/2011
- [Plan 61.](#) 10/30/2010 - 3/31/2011
- [Plan 63.](#) 7/1/2008 - 6/30/2011
- [Plan 64.](#) 9/1/2010 - 9/1/2011
- [Plan 66.](#) 7/1/2008 - 6/30/2011
- [Plan 68.](#) 11/1/2007 - 10/31/2010 (It is the Fund's understanding that a new CBA is presently under negotiation.)
- [Plan 70.](#) The Fund has not been able to obtain a CBA for this Plan.

III. As requested, we have inserted information in the boxes that were left blank in our original waiver application submission, inserting "none" where applicable and providing additional information as necessary. Please note that in column AV, we inserted the text "See attachment," which references the enclosed PDF attachment we previously provided with the Fund's waiver application submission.

IV. As requested, we have provided projected employer and employee contributions for the plan year beginning on February 1, 2011, with and without approval of the Fund's waiver application. These projected employer and employee contributions are based on the terms of the current CBAs for each plan and information provided by the applicable employers.

With respect to Plans with CBAs expiring prior to or during the plan year beginning on February 1, 2011, the Fund reported projected employer and employee contributions on the enclosed spreadsheet based on the terms of the existing CBAs and employer-provided data. Since actual employer and employee contributions are determined pursuant to the collective bargaining process between the union and contributing employers, the Fund cannot predict with certainty what the change in cost-sharing will be, but based on the information available and the current CBAs, the Fund has made the projections reflected in the attached spreadsheet.

With respect to Plan 70, while the Fund has not been able to obtain a CBA, the contributing employer has reported to the Fund that it contributes the entire monthly contribution for its employees participating in the Plan. Therefore, the Fund has projected that the Plan 70 employer will pay the full projected monthly contribution, with or without approval of the waiver application.

Please feel free to contact me with any additional questions.

Andrew R. Dietrich

Attorney at Law

Slevin & Hart, P.C.

1625 Massachusetts Ave., N.W., Suite 450

Washington, D.C. 20036

202-797-8700 Tel

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CARP IND:000002

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From: Moultrie, Cam (HHS/OCIIO) [mailto:Cam.Moultrie@hhs.gov]
Sent: Monday, January 24, 2011 3:14 PM
To: Andrew R. Dietrich
Cc: Habit, Sandra (HHS/OCIIO)
Subject: Waiver Application for Carpenters Industrial Council Trust Fund

Thank you for your application for the Waiver of the Annual Limits Requirements of the Public Health Service Act (PHS Act) Section 2711. In order to expedite your application, please provide the following information:

- Confirm whether the plan was in existence prior to March 23, 2010. If so, is the plan in compliance with grandfathering provisions, pursuant to 45 CFR 147.140?
- Provide the effective and expiration dates of the collective bargaining agreements.
- You left some of the boxes on the spreadsheet blank. Please insert the correct information, "N/A", or "None" as applicable.
- Provide employer and employee contributions projected for the next plan year with and without the waiver.

In order to complete your application, please provide this information by 5:00 pm, January 26, 2011. Once this information is received and the application is complete, it will be processed by the Department of Health and Human Services (HHS). As stated in our September 3, 2010 Sub-Regulatory Guidance, HHS will issue a decision within 30 days of receiving a complete application. You will receive an e-mail from HHS notifying you of the waiver decision.

Thank you.

Cam Lynne Moultrie J.D., LL.M.
Office of Consumer Information and Insurance Oversight
U.S. Department of Health and Human Services
(301) 492-4174
cam.moultrie@hhs.gov

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CARP IND:000003

From: Botwinick, Alexandra (HHS/OCIO)

Sent: Thursday, February 03, 2011 3:00 PM

To: 'AAM@slevinhart.com'

Cc: Habit, Sandra (HHS/OCIO)

Subject: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011

Importance: High

Attachments: February 1 .pdf

Good Morning,

Thank you for submitting an application for a Waiver of the Annual Limits Requirements of the PHS Act Section 2711 for Carpenters Industrial Council Trust Fund. HHS has reviewed your application and made its determination. Please see the attached letter.

The attached letter refers to the following plans:

Plan 3
Plans 4 and 41
Plans 6 and 7
Plan 10
Plan 12
Plan 21
Plan 24

CARP IND:000004

Plans 45 and 50

Plan 52

Plan 53

Plan 54

Plan 55

Plan 58

Plan 59

Plan 61

Plan 63

Plan 64
Plan 66
Plan 68
Plan 70

Please confirm receipt of this letter by replying to this e-mail.

Please let me know if I can be of further assistance.

Alexandra Botwinick

Office of Oversight
HHS/OCIIO
alexandra.botwinick@hhs.gov

From: Moultrie, Cam (HHS/OCIIO)
Sent: Friday, January 28, 2011 1:13 PM
To: Andrew R. Dietrich
Cc: Habit, Sandra (HHS/OCIIO)

Subject: RE: Waiver Application for Carpenters Industrial Council Trust Fund

Thank you for your information. Your application is now complete and you will receive a determination of your application within 30 days.

Thank you.

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From: Andrew R. Dietrich

CARP IND:000007

Sent: Wednesday, January 26, 2011 2:25 PM

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- [Plan 54.](#) 10/28/2009 - 5/31/2013
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CARP IND:000008

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Andrew R. Dietrich

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From: Moultrie, Cam (HHS/OCIIO) [mailto:Cam.Moultrie@hhs.gov]

Sent: Monday, January 24, 2011 3:14 PM

To: Andrew R. Dietrich

Cc: Habit, Sandra (HHS/OCIIO)

Subject: Waiver Application for Carpenters Industrial Council Trust Fund

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CARP IND:000009

days of receiving a complete application. You will receive an e-mail from HHS notifying you of the waiver decision.

Thank you.

Cam Lynne Moultrie J.D., LL.M.
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U.S. Department of Health and Human Services
(301) 492-4174
cam.moultrie@hhs.gov

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From: Botwinick, Alexandra (HHS/OCIIO)
Sent: Thursday, February 03, 2011 3:08 PM
To: 'AAM@slevinhart.com'
Cc: Habit, Sandra (HHS/OCIIO)
Subject: FW: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011

Importance: High

Attachments: Feb Denial Letter.pdf

Please disregard the previous attachment. It was sent in error. The denial letter attached here applies to the below mentioned plans. Please let me know if you would like information about our reconsideration process.

I do apologize for the error.

Alexandra Botwinick

Office of Oversight
HHS/OCIIO
alexandra.botwinick@hhs.gov

From: Botwinick, Alexandra (HHS/OCIIO)
Sent: Thursday, February 03, 2011 3:00 PM
To: 'AAM@slevinhart.com'
Cc: Habit, Sandra (HHS/OCIIO)
Subject: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011
Importance: High

Good Morning,

Thank you for submitting an application for a Waiver of the Annual Limits Requirements of the PHS Act Section 2711 for Carpenters Industrial Council Trust Fund. HHS has reviewed your application and made its determination. Please see the attached letter.

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Plan 3
Plans 4 and 41
Plans 6 and 7

CARP IND:000011

Plan 10
Plan 12
Plan 21
Plan 24
Plans 45 and 50
Plan 52
Plan 53
Plan 54
Plan 55

Plan 58
Plan 59
Plan 61
Plan 63
Plan 64
Plan 66
Plan 68
Plan 70

Please confirm receipt of this letter by replying to this e-mail.

Please let me know if I can be of further assistance.

Alexandra Botwinick

Office of Oversight
HHS/OCIIO
alexandra.botwinick@hhs.gov

From: Allison A. Madan [amadan@slevinhart.com]

Sent: Thursday, February 03, 2011 3:28 PM

To: Botwinick, Alexandra (HHS/OCIIO)

Cc: Habit, Sandra (HHS/OCIIO)

Subject: RE: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011

Thank you. I am not familiar with the reconsideration process - can you provide a summary of the process?

Allison A. Madan

Principal

Slevin & Hart, P.C.

1625 Massachusetts Ave., N.W., Suite 450

Washington, D.C. 20036

202-797-8700 Tel

202-234-8231 Fax

amadan@slevinhart.com

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From: Botwinick, Alexandra (HHS/OCIIO) [mailto:Alexandra.Botwinick@hhs.gov]

Sent: Thursday, February 03, 2011 3:08 PM

To: Allison A. Madan

Cc: Habit, Sandra (HHS/OCIIO)

Subject: FW: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011

Importance: High

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I do apologize for the error.

Alexandra Botwinick

Office of Oversight

HHS/OCIIO

alexandra.botwinick@hhs.gov

From: Botwinick, Alexandra (HHS/OCIIO)

Sent: Thursday, February 03, 2011 3:00 PM

To: 'AAM@slevinhart.com'

Cc: Habit, Sandra (HHS/OCIIO)

CARP IND:000015

Subject: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011
Importance: High

Good Morning,

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The attached letter refers to the following plans:

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Plan 24
Plans 45 and 50

Plan 52

Plan 53

Plan 54

Plan 55

Plan 58

Plan 59

Plan 61

Plan 63

Plan 64

Plan 66
Plan 68
Plan 70

Please confirm receipt of this letter by replying to this e-mail.

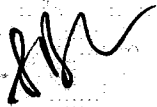
Please let me know if I can be of further assistance.

Alexandra Botwinick

Office of Oversight
HHS/OCIIO
alexandra.botwinick@hhs.gov



Date: November 2010

From: Steve Larsen, Director, Office of Oversight 

Subject: Application for Waiver of the Annual Limits Requirements of PHS Act Section 2711

Dear Waiver Applicant:

Section 2711(a)(2) of the Public Health Service Act (PHS Act), as added by the Patient Protection and Affordable Care Act (Affordable Care Act), requires the Secretary to impose restrictions on the imposition of annual limits on the dollar value of essential health benefits (as defined in section 1302(b) of the Affordable Care Act) for any participant or beneficiary in a new or existing group health plan or a new policy in the individual market for plan or policy years beginning on or after September 23, 2010 and prior to January 1, 2014. Specifically, the Secretary is granted the authority to determine what constitutes a "restricted annual limit" that can still be imposed under such plans or policies prior to January 1, 2014.

The interim final regulations published on June 28, 2010 (codified at 26 CFR § 54.9815-2719T; 29 CFR § 2590.715-2719; and 45 CFR §147.126) established such restricted annual limits. The regulations also provided that these restricted annual limits may be waived by the Secretary of Health and Human Services (HHS) if compliance with the interim final regulations would result in a significant decrease in access to benefits or a significant increase in premiums. Pursuant to the regulation, HHS issued guidance on September 3 regarding the scope and process for applying for a waiver.

The Office of Consumer Information and Insurance Oversight, Office of Insurance Oversight received and processed your application for the plan(s) or policy(ies) year beginning February 1, 2011. We have determined that your application has not demonstrated that the requirement of the restricted annual limit would result in a significant decrease in access to benefits for those currently covered by such plans or policies, or a significant increase in premiums paid by those covered by such plans or policies. Please refer to the interim final regulations codified at 26 CFR § 54.9815-2719T; 29 CFR § 2590.715-2719; and 45 CFR §147.126 for the restricted annual limits, \$750,000 for a plan year beginning on or after September 23, 2010, but before September 23, 2011.


If you have any questions regarding this letter, please email OCIIOOversight@hhs.gov.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Consumer Information and
Insurance Oversight
Washington, DC 20201

Date: November 2010

From: Steve Larsen, Director, Office of Oversight 

Subject: Application for Waiver of the Annual Limits Requirements of PHS Act Section 2711

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The interim final regulations published on June 28, 2010 (codified at 26 CFR § 54.9815-2719T; 29 CFR § 2590.715-2719; and 45 CFR § 147.126) established such restricted annual limits. The regulations also provided that these restricted annual limits may be waived by the Secretary of Health and Human Services (HHS) if compliance with the interim final regulations would result in a significant decrease in access to benefits or a significant increase in premiums. Pursuant to the regulation, HHS issued guidance on September 3 regarding the scope and process for applying for a waiver.

The Office of Consumer Information and Insurance Oversight, Office of Insurance Oversight received and processed your application for the plan(s) or policy(ies) year beginning February 1, 2011. We have determined that your application has met the criteria to obtain a waiver of the restricted annual limits requirements because compliance with the interim final regulations would result in a significant decrease in access to benefits for those currently covered by such plans or policies, or a significant increase in premiums paid by those covered by such plans or policies. To the extent you make any change to your benefit package after March 23, 2010, you must determine whether the change(s) will trigger loss of grandfathering status pursuant to 45 CFR § 147.140(g)(1).

An approval of your request for waiver of the restricted annual limits requirements granted under this process applies only to the annual limit(s) provided in your application for the plan or policy year beginning between September 23, 2010 and September 23, 2011. This waiver only applies to the annual limits requirements in Section 2711 of the ACA and does not apply to any other requirement of the Affordable Care Act, ERISA, the IRS Code or the PHS Act. Further, a group

health plan or health insurance issuer must reapply for any subsequent plan or policy year prior to January 1, 2014 when this waiver expires in accordance with future guidance from HHS. HHS may modify this waiver approval process memorandum and other relevant information.

If you have any questions regarding this letter, please email OCIIOversight@hhs.gov.

From: Botwinick, Alexandra (HHS/OCIIO)
Sent: Thursday, February 03, 2011 8:41 PM
To: Allison A. Madan
Cc: Habit, Sandra (HHS/OCIIO); Kottenmeier, Erika (HHS/OCIIO)
Subject: Reconsideration Process Carpenters Industrial Council Trust
Fund Waiver of the Annual Limits Requirements 2-3-2011

Ms. Madan,

If you wish to set up a phone call to discuss a reconsideration of the denial of a waiver of the annual limit requirements, Erika Kottenmeier is the point person for that process. You should draft a letter setting out any supplemental information not included in the original application explaining why the denial of the waiver determination will result in either:

- i. A significant increase in premiums, or
- ii. A significant decrease in access to benefits.

Upon receipt of that letter, Erika can arrange a phone call with a manager as soon as feasible.

Erika's contact information is:

Erika Kottenmeier
OCIIO
7501 Wisconsin Ave
Bethesda, MD 20814
(301) 492-4170
Erika.Kottenmeier@hhs.gov

Please let me know if I can be of any further assistance.

Sincerely,

Alexandra Botwinick

Office of Oversight
HHS/OCIIO
alexandra.botwinick@hhs.gov

From: Allison A. Madan [amadan@slevinhart.com]
Sent: Thursday, February 03, 2011 3:27 PM
To: Botwinick, Alexandra (HHS/OCIIO)
Cc: Habit, Sandra (HHS/OCIIO)
Subject: RE: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011

Thank you. I am not familiar with the reconsideration process - can you provide a summary of the process?

Allison A. Madan
Principal
Slevin & Hart, P.C.
1625 Massachusetts Ave., N.W., Suite 450 Washington, D.C. 20036 202-797-8700 Tel
202-234-8231 Fax
amadan@slevinhart.com<mailto:amadan@slevinhart.com>

CARP IND:000022

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From: Botwinick, Alexandra (HHS/OCIIO) [mailto:Alexandra.Botwinick@hhs.gov]
Sent: Thursday, February 03, 2011 3:08 PM
To: Allison A. Madan
Cc: Habit, Sandra (HHS/OCIIO)
Subject: FW: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011
Importance: High

Please disregard the previous attachment. It was sent in error. The denial letter attached here applies to the below mentioned plans. Please let me know if you would like information about our reconsideration process.

I do apologize for the error.

Alexandra Botwinick

Office of Oversight
HHS/OCIIO
alexandra.botwinick@hhs.gov<mailto:alexandra.botwinick@hhs.gov>

From: Botwinick, Alexandra (HHS/OCIIO)
Sent: Thursday, February 03, 2011 3:00 PM
To: 'AAM@slevinhart.com'
Cc: Habit, Sandra (HHS/OCIIO)
Subject: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011
Importance: High

Good Morning,

Thank you for submitting an application for a Waiver of the Annual Limits Requirements of the PHS Act Section 2711 for Carpenters Industrial Council Trust Fund. HHS has reviewed your application and made its determination. Please see the attached letter.

The attached letter refers to the following plans:

Plan 3

Plans 4 and 41

CARP IND:000023

Plans 6 and 7

Plan 10

Plan 12

Plan 21

Plan 24

Plans 45 and 50

Plan 52

Plan 53

Plan 54

Plan 55

Plan 58

Plan 59

Plan 61

Plan 63

Plan 64

Plan 66

Plan 68

Plan 70

Please confirm receipt of this letter by replying to this e-mail.

Please let me know if I can be of further assistance.

Alexandra Botwinick

Office of Oversight

HHS/OCIIO

alexandra.botwinick@hhs.gov<mailto:alexandra.botwinick@hhs.gov>

CARP IND:000024

From: Allison A. Madan [amadan@slevinhart.com]
Sent: Friday, February 04, 2011 10:04 AM
To: Botwinick, Alexandra (HHS/OCIIO)
Cc: Habit, Sandra (HHS/OCIIO); Kottenmeier, Erika (HHS/OCIIO)
Subject: RE: Reconsideration Process Carpenters Industrial Council Trust
Fund Waiver of the Annual Limits Requirements 2-3-2011

Thank you.

-----Original Message-----

From: Botwinick, Alexandra (HHS/OCIIO)
[mailto:Alexandra.Botwinick@hhs.gov]
Sent: Thursday, February 03, 2011 8:41 PM
To: Allison A. Madan
Cc: Habit, Sandra (HHS/OCIIO); Kottenmeier, Erika (HHS/OCIIO)
Subject: Reconsideration Process Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements
2-3-2011

Ms. Madan,

If you wish to set up a phone call to discuss a reconsideration of the denial of a waiver of the annual limit requirements, Erika Kottenmeier is the point person for that process. You should draft a letter setting out any supplemental information not included in the original application explaining why the denial of the waiver determination will result in either:

- i. A significant increase in premiums, or
- ii. A significant decrease in access to benefits.

Upon receipt of that letter, Erika can arrange a phone call with a manager as soon as feasible.

Erika's contact information is:

Erika Kottenmeier
OCIIO
7501 Wisconsin Ave
Bethesda, MD 20814
(301) 492-4170
Erika.Kottenmeier@hhs.gov

Please let me know if I can be of any further assistance.

Sincerely,

Alexandra Botwinick

Office of Oversight
HHS/OCIIO
alexandra.botwinick@hhs.gov

From: Allison A. Madan [amadan@slevinhart.com]
Sent: Thursday, February 03, 2011 3:27 PM
To: Botwinick, Alexandra (HHS/OCIIO)
Cc: Habit, Sandra (HHS/OCIIO)

CARP IND:000025

Subject: RE: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011

Thank you. I am not familiar with the reconsideration process - can you provide a summary of the process?

Allison A. Madan

Principal

Slevin & Hart, P.C.

1625 Massachusetts Ave., N.W., Suite 450 Washington, D.C. 20036 202-797-8700 Tel

202-234-8231 Fax

amadan@slevinhart.com<mailto:amadan@slevinhart.com>

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From: Botwinick, Alexandra (HHS/OCIIO)

[mailto:Alexandra.Botwinick@hhs.gov]

Sent: Thursday, February 03, 2011 3:08 PM

To: Allison A. Madan

Cc: Habit, Sandra (HHS/OCIIO)

Subject: FW: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011

Importance: High

Please disregard the previous attachment. It was sent in error. The denial letter attached here applies to the below mentioned plans. Please let me know if you would like information about our reconsideration process.

I do apologize for the error.

Alexandra Botwinick

Office of Oversight

HHS/OCIIO

alexandra.botwinick@hhs.gov<mailto:alexandra.botwinick@hhs.gov>

From: Botwinick, Alexandra (HHS/OCIIO)

Sent: Thursday, February 03, 2011 3:00 PM

To: 'AAM@slevinhart.com'

Cc: Habit, Sandra (HHS/OCIIO)

Subject: Carpenters Industrial Council Trust Fund Waiver of the Annual Limits Requirements 2-3-2011

Importance: High

CARP IND:000026

Good Morning,

Thank you for submitting an application for a Waiver of the Annual Limits Requirements of the PHS Act Section 2711 for Carpenters Industrial Council Trust Fund. HHS has reviewed your application and made its determination. Please see the attached letter.

The attached letter refers to the following plans:

Plan 3

Plans 4 and 41

Plans 6 and 7

Plan 10

Plan 12

Plan 21

Plan 24

Plans 45 and 50

Plan 52

Plan 53

Plan 54

Plan 55

Plan 58

Plan 59

Plan 61

Plan 63

Plan 64

Plan 66

Plan 68

Plan 70

Please confirm receipt of this letter by replying to this e-mail.

Please let me know if I can be of further assistance.

CARP IND:000027

Alexandra Botwinick

Office of Oversight

HHS/OCIIO

alexandra.botwinick@hhs.gov<mailto:alexandra.botwinick@hhs.gov>

CARP IND:000028

From: Moultrie, Cam (HHS/OCIO)
Sent: Monday, January 24, 2011 3:14 PM
To: adietrich@slevinhart.com
Cc: Habit, Sandra (HHS/OCIO)
Subject: Waiver Application for Carpenters Industrial Council Trust Fund

Thank you for your application for the Waiver of the Annual Limits Requirements of the Public Health Service Act (PHS Act) Section 2711. In order to expedite your application, please provide the following information:

- Confirm whether the plan was in existence prior to March 23, 2010. If so, is the plan in compliance with grandfathering provisions, pursuant to 45 CFR 147.140?
- Provide the effective and expiration dates of the collective bargaining agreements.
- You left some of the boxes on the spreadsheet blank. Please insert the correct information, "N/A", or "None" as applicable.
- Provide employer and employee contributions projected for the next plan year with and without the waiver.

In order to complete your application, please provide this information by 5:00 pm, January 26, 2011. Once this information is received and the application is complete, it will be processed by the Department of Health and Human Services (HHS). As stated in our September 3, 2010 Sub-Regulatory Guidance, HHS will issue a decision within 30 days of receiving a complete application. You will receive an e-mail from HHS notifying you of the waiver decision.

Thank you.

Cam Lynne Moultrie J.D., LL.M.
Office of Consumer Information and Insurance Oversight
U.S. Department of Health and Human Services
(301) 492-4174
cam.moultrie@hhs.gov

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From: Andrew R. Dietrich [adietrich@slevinhart.com]

Sent: Wednesday, January 26, 2011 2:25 PM

To: Moultrie, Cam (HHS/OCIIO)

Cc: Habit, Sandra (HHS/OCIIO); Allison A. Madan; sherring@cic-ubc.org; rick@crmsinc.org; Martha.Feazell@wellsfargo.com; Donna.Asbury@wellsfargo.com; CDYOUNG@GAPAC.com

Subject: RE: Waiver Application for Carpenters Industrial Council Trust Fund

Attachments: SLEVINHARTDM_n334508_v1_4136_1_101231_waiver_application_attachment.pdf;
SLEVINHARTDM_n341547_v1_4136_1_110126_Updated_waiver_application.xls

Ms. Moultrie:

We are counsel to the Carpenters Industrial Council Trust Fund ("Fund"). This responds to your email below requesting additional information regarding the Fund's application for waiver of the annual limits requirements of the Public Health Service Act ("PHS Act") Section 2711 as applicable to various plans of benefits ("Plans") provided by the Fund.

I. The Fund was in existence prior to March 23, 2010. It is the Fund's understanding that the Plans identified in the waiver application meet the requirements of a "grandfathered plan," as that term is used in applicable regulations. The Fund is prepared to comply with the PPACA requirements applicable to grandfathered plans with respect to these Plans, effective February 1, 2011. However, if the Fund's waiver application is not granted, potential increases in participant cost-sharing could impact a particular Plan's ability to maintain grandfathered status. As indicated in the enclosed PDF attach , which was previously provided with the Fund's waiver application, the Fund's benefit consultant estimates there would be a (b)(4) funding shortfall for each Plan that cannot satisfy the grandfathered status requirements in 2011 and such a loss of grandf d status would likely result in additional projected rate increases and participant cost-sharing not reflected in the spreadsheet.

II. Based on information currently available to the Fund, the effective dates and expiration dates for the applicable collective bargaining agreements ("CBAs") are as follows:

- [Plan 3.](#) 3/3/2010 - 2/2/2013
- [Plans 4 and 41.](#) 11/30/2010 - 11/30/2011
- [Plans 6 and 7.](#) 9/1/2010 - 8/31/2014
- [Plan 10.](#) 1/1/2010 - 12/31/2013
- [Plan 12.](#) 11/1/2009 - 10/31/2013
- [Plan 21.](#) 3/23/2008 - 3/31/2011
- [Plan 24.](#) 3/5/2006 - 3/5/2011
- [Plans 45 and 50.](#) 10/1/2009 - 9/30/2013
- [Plan 52.](#) 6/1/2009 - 5/31/2013
- [Plan 53.](#) 6/1/2009 - 5/31/2013
- [Plan 54.](#) 10/28/2009 - 5/31/2013
- [Plan 55.](#) 6/1/2009 - 5/31/2013
- [Plan 58.](#) 12/1/2007 - 11/30/2011
- [Plan 59.](#) 11/30/2007 - 11/30/2011
- [Plan 61.](#) 10/30/2010 - 3/31/2011
- [Plan 63.](#) 7/1/2008 - 6/30/2011
- [Plan 64.](#) 9/1/2010 - 9/1/2011
- [Plan 66.](#) 7/1/2008 - 6/30/2011
- [Plan 68.](#) 11/1/2007 - 10/31/2010 (It is the Fund's understanding that a new CBA is presently under negotiation.)
- [Plan 70.](#) The Fund has not been able to obtain a CBA for this Plan.

III. As requested, we have inserted information in the boxes that were left blank in our original waiver application submission, inserting "none" where applicable and providing additional information as necessary. Please note that in column AV, we inserted the text "See attachment," which references the enclosed PDF attachment we previously provided with the Fund's waiver application submission.

IV. As requested, we have provided projected employer and employee contributions for the plan year beginning on February 1, 2011, with and without approval of the Fund's waiver application. These projected employer and employee contributions are based on the terms of the current CBAs for each plan and information provided by the applicable employers.

CARP IND:000030

With respect to Plans with CBAs expiring prior to or during the plan year beginning on February 1, 2011, the Fund reported projected employer and employee contributions on the enclosed spreadsheet based on the terms of the existing CBAs and employer-provided data. Since actual employer and employee contributions are determined pursuant to the collective bargaining process between the union and contributing employers, the Fund cannot predict with certainty what the change in cost-sharing will be, but based on the information available and the current CBAs, the Fund has made the projections reflected in the attached spreadsheet.

With respect to Plan 70, while the Fund has not been able to obtain a CBA, the contributing employer has reported to the Fund that it contributes the entire monthly contribution for its employees participating in the Plan. Therefore, the Fund has projected that the Plan 70 employer will pay the full projected monthly contribution, with or without approval of the waiver application.

Please feel free to contact me with any additional questions.

Andrew R. Dietrich

Attorney at Law

Slevin & Hart, P.C.

1625 Massachusetts Ave., N.W., Suite 450

Washington, D.C. 20036

202-797-8700 Tel

202-234-8231 Fax

adietrich@slevinhart.com

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From: Moultrie, Cam (HHS/OCIIO) [mailto:Cam.Moultrie@hhs.gov]
Sent: Monday, January 24, 2011 3:14 PM
To: Andrew R. Dietrich
Cc: Habit, Sandra (HHS/OCIIO)
Subject: Waiver Application for Carpenters Industrial Council Trust Fund

Thank you for your application for the Waiver of the Annual Limits Requirements of the Public Health Service Act (PHS Act) Section 2711. In order to expedite your application, please provide the following information:

- Confirm whether the plan was in existence prior to March 23, 2010. If so, is the plan in compliance with grandfathering provisions, pursuant to 45 CFR 147.140?
- Provide the effective and expiration dates of the collective bargaining agreements.
- You left some of the boxes on the spreadsheet blank. Please insert the correct information, "N/A", or "None" as applicable.
- Provide employer and employee contributions projected for the next plan year with and without the waiver.

In order to complete your application, please provide this information by 5:00 pm, January 26, 2011. Once this information is received and the application is complete, it will be processed by the Department of Health and Human Services (HHS). As stated in our September 3, 2010 Sub-Regulatory Guidance, HHS will issue a decision within 30

CARP IND:000031

days of receiving a complete application. You will receive an e-mail from HHS notifying you of the waiver decision.

Thank you.

Cam Lynne Moultrie J.D., LL.M.
Office of Consumer Information and Insurance Oversight
U.S. Department of Health and Human Services
(301) 492-4174
cam.moultrie@hhs.gov

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CARP IND:000032

Carpenters Industrial Council Trust Fund
Waiver of Annual Limits Requirements
Attachment to Application

General

The attached spreadsheet has been prepared in a good faith effort to comply with the published requirements for applying for a waiver from PPACA's annual limits. The spreadsheet has been completed in as broad and comprehensive a manner as possible, but its fields should not be interpreted as confirmation that a given benefit is an essential benefit or a benefit for which a waiver is required.

In addition to the lifetime limits listed on the spreadsheet, the Plan of benefits ("Plan") of the Carpenter's Industrial Council Trust Fund ("Fund") has a (b)(4) inpatient and (b)(4) outpatient lifetime limit on hospice benefits. To the extent that HH grant a waiver is lifetime limit, and all other lifetime limits described in the spreadsheet, if they are converted to annual limits as permitted under PPACA, we hereby request such a waiver on the grounds that the Board of Trustees of the Fund will amend the Plan to convert its lifetime limits to annual limits, effective February 1, 2011.

In addition to the annual and lifetime limits listed on the spreadsheet, a (b)(4) limit applies for preexisting condition expenses during the applicable preexisting condition exclusion period for each plan of benefits. Pursuant to PPACA, the Board of Trustees will amend the Fund's plan of benefits to eliminate this limit for individuals under age 19. However, to the extent that the benefits covered by this limit are considered "essential benefits" by HHS, the Board of Trustees hereby seeks a waiver of the restriction of such limit.

Column AT - Projected Rate Increase that would result from compliance with the \$750,000 Annual Limit Restriction

The Fund is a multiemployer, Taft-Hartley, health and welfare fund. The total Employer/Employee contribution rates are determined on an annual basis, with rates renewing on staggered dates from January through December, depending on Plan number. However, the amount of each Employer contribution as compared to the Employee contribution is established in Collective Bargaining Agreements ("CBAs") entered into between the Fund's contributing employers and the United Brotherhood of Carpenters and Joiners of America, Carpenters Industrial Council and differ from Plan to Plan. As a result, Employer and Employee contributions, and coverage tiers, vary depending upon the CBA terms, with many CBAs limiting the amount that an Employer's contribution may increase. The current CBAs have staggered expiration dates ranging from early 2011 through at least October, 2013. The Board of Trustees that serves as the Fund's Administrator, and the bargaining parties, are bound by the negotiated terms of the CBAs until the expiration dates of the CBAs and the Trustees cannot speculate as to whether and how any increased contributions needed to offset the cost of complying with the \$750,000 annual limits would be assigned between participants or employers.

Column AV - Decrease in Access to Benefits that would Result from compliance with \$750,000 Annual Limit Restriction

As a multiemployer, Taft Hartley, health and welfare fund with many Employer contribution rates limited by the CBAs, the Board of Trustees is limited in its ability to fund the costs of the annual limits required under PPACA. As the Trustees believe that a waiver of the PPACA annual limits is warranted, no decisions have been made at this time regarding the actual benefit decreases that would be needed to offset a \$750,000 annual benefit limit if Employer contribution increases cannot be obtained. However, if the waiver is not granted, the Trustees would likely be required to decrease benefits. Specifically, given the percentage increases set forth in the spreadsheet, the Trustees would have to consider increases to deductibles and/or increases to the co-insurance amounts required to be paid by participants. Such increases may be unaffordable for affected participants who would forego medical care as a result of an increase in co-insurance or deductibles.

Columns AV and AT

The Fund intends to comply with the PPACA requirements applicable to “grandfathered plans,” as that term is used in the applicable regulations. Therefore, all calculations in the spreadsheet have been made on that basis. However, if the Fund must comply with the \$750,000 annual limit restriction under the PPACA, potential increases in participant cost-sharing could impact a particular Plan’s ability to maintain grandfathered status. The Fund is still evaluating each Plan to determine if the requirements applicable to grandfathered plans can be satisfied. However, the Fund’s benefit consultant estimates there would be a ^{(b)(4)} funding shortfall for each Plan that cannot satisfy the grandfathered status requirements in 2011. Such a loss of grandfathered status would likely result in additional projected rate increases and participant cost-sharing not reflected in the spreadsheet.

334323v1

Annual Limit Waiver Request Applicant Name	Policy Name (use a new row for each policy application)	Applicant (Plan/ Policy Situs) City	Applicant (Plan/ Policy Situs) State	Plan/ Policy Effective Date (mm/dd/yyyy)	Contact Name	Street Address	City	State	Zip Code	Phone Number (including area code)	Email Address	Type of Coverage (e.g., Limited Benefit, HRA, Rx only, Other)	Self-Insured (Yes/No)	Individual or Group Policy	Total Number of Individuals Covered by Policy (include all dependents covered)	Current Plan Overall Annual Limit (in dollars)	Ambulatory	Emergency
Carpenters Industrial Council Trust Fund	Plan 3	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington	DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group				
Carpenters Industrial Council Trust Fund	Plan 3	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington	DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group		(b)(4)		
Carpenters Industrial Council Trust Fund	Plans 4 and 41	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington	DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group				

C

Carpenters Industrial Council Trust Fund	Plans 4 and 41	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington	DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plans 4 and 41	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington	DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plans 4 and 41	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington	DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plans 6 and 7	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington	DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plans 6 and 7	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 10	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 10	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 12	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group

(b)(4)

Carpenters Industrial Council Trust Fund	Plan 12	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plan 21	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 21	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 21	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plan 21	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plan 24	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 24	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plans 45 and 50	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plans 45 and 50	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plan 52	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 52	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 53	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plan 53	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plan 54	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 54	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 55	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plan 55	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 58	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 58	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 59	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group

(b)(4)

Carpenters Industrial Council Trust Fund	Plan 59	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plan 61	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 61	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 63	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plan 63	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plan 63	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 64	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 64	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plan 64	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plan 64	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 66	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 66	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plan 66	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
Carpenters Industrial Council Trust Fund	Plan 68	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 68	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	
Carpenters Industrial Council Trust Fund	Plan 68	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	

Carpenters Industrial Council Trust Fund	Plan 68	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 70	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 70	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group
Carpenters Industrial Council Trust Fund	Plan 70	Charleston	WV	2/1/2011	Allison Madan	1625 Massachusetts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group

(b)(4)

Carpenters Industrial Council Trust Fund	Plan 70	Charleston	WV	2/1/2011	Allison Madan	1625 Massachu setts Ave NW, Suite 450	Washington DC	20036	202.797.8700	AAM@slevinhardt.com	Other	Yes	Group	(b)(4)
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Current Essential Benefits Annual Limits (Annual Limit for Each Essential Benefit)

Office Visit Copays/Coinsurance Hospital Inpatient Copay/Coinsurance Emergency Room Copay/Coinsurance Rx Copay/Coinsurance

Hospitalization	Laboratory	Pediatric	Maternity/ Newborn	Mental Health/ Substance Abuse	Rehabilitative/ Devices	Preventive/ Wellness	Prescription	Plan Deductible	Copay (if applicable)	Coinsurance (if applicable)	Copay (if applicable)	Coinsurance (if applicable)	Copay (if applicable)	Coinsurance (if applicable)	Copay (if applicable)	Coinsurance (if applicable)
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(b)(4)

(b)(4)

Pages 51 through 62 redacted for the following reasons:

(b)(4)

Current Monthly Premium Rates or Premium Equivalent Rates (in dollars)*:				Renewal Monthly Premium Rates or Premium Equivalent Rates if Waiver Granted (in dollars)*			Projected Rate Increase that would result from compliance with \$750,000 Annual Limit Restriction (in dollars) (Average						
Individual/ Employee Tier*	Employee contribution (if applicable)	Employer contribution (if applicable)	Total	Employee contribution (if applicable)	Employer contribution (if applicable)	Total	Employee contribution (if applicable)	Employer contribution (if applicable)	Total	Projected Rate Increase that would result from compliance with \$750,000 Annual Limit Restriction (in dollars)(Average Premium by Individual) (Difference of Column AT and AQ divided by Column AQ)	Decrease in Access to Benefits that would result from compliance with \$750,000 Annual Limit Restriction (describe briefly in cell or in a separate file)	Plan Administrator/ CEO of Health Insurance Issuer Name	Title of Individual Providing Attestation
Employee										See attachment		Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
Employee + Family										See attachment		Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
Employee										See attachment		Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees

(b)(4)

Employee+Spous \$	See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
Employee+Child(\$	See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
Employee + Family \$	See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
Employee \$	See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees

(b)(4)

Employee +
Family

See attachment

Board of
Trustees of the
Carpenters
Industrial
Council Trust
Fund

Steve Herring,
Chairman, Board
of Trustees

Carl Young,
Secretary, Board
of Trustees

Employee

See attachment

Board of
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Steve Herring,
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(b)(4)

Employee +
Family

See attachment

Board of
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Steve Herring,
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Employee

See attachment

Board of
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Employee +
Family

See attachment

Board of
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(b)(4)

Employee +
Spouse

See attachment

Board of
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Steve Herring,
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Employee +
Child(ren)

See attachment

Board of
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Employee +
Family

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(b)(4)

Employee +
Family

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(b)(4)

Employee +
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Employee +
Family

See attachment

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(b)(4)

Employee +
Family

See attachment

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Employee

See attachment

Board of
Trustees of the
Carpenters
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Council Trust
Fund

Steve Herring,
Chairman, Board
of Trustees

Carl Young,
Secretary, Board
of Trustees

Employee + One Person	See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
Employee + Family	See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
Employee	See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
Employee + Spouse	See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees

(b)(4)

Employee +
Child(ren)

See attachment

Board of
Trustees of the
Carpenters
Industrial
Council Trust
Fund

Steve Herring,
Chairman, Board
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Carl Young,
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Employee +
Family

See attachment

Board of
Trustees of the
Carpenters
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Fund

Steve Herring,
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Carl Young,
Secretary, Board
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(b)(4)

Employee

See attachment

Board of
Trustees of the
Carpenters
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Fund

Steve Herring,
Chairman, Board
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Carl Young,
Secretary, Board
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Employee +
One Person

See attachment

Board of
Trustees of the
Carpenters
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Steve Herring,
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Carl Young,
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Employee +
Family

See attachment

Board of
Trustees of the
Carpenters
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Steve Herring,
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Carl Young,
Secretary, Board
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Employee

See attachment

Board of
Trustees of the
Carpenters
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Steve Herring,
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(b)(4)

Employee +
Spouse

See attachment

Board of
Trustees of the
Carpenters
Industrial
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Fund

Steve Herring,
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Carl Young,
Secretary, Board
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Employee +
Child(ren)

See attachment

Board of
Trustees of the
Carpenters
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Steve Herring,
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Employee +
Family

See attachment

Board of
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Employee

See attachment

Board of
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(b)(4)

Employee +
Spouse

See attachment

Board of
Trustees of the
Carpenters
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Steve Herring,
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of Trustees

Employee +
Child(ren)

See attachment

Board of
Trustees of the
Carpenters
Industrial
Council Trust
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Steve Herring,
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Carl Young,
Secretary, Board
of Trustees

Employee +
Family

(b)(4)

See attachment	Board of Trustees of the Carpenters Industrial Council Trust Fund	Steve Herring, Chairman, Board of Trustees Carl Young, Secretary, Board of Trustees
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