To All Navia Customers,

This is a general reminder to ensure that you have distributed and made available your summary plan descriptions for your Navia benefit plans. If you have not previously distributed your summary plan descriptions to your employees, you can find them on the Navia Employer Portal under the Forms and Documents page. Please review the information below pertaining to your documents.

**PLAN DOCUMENTS & SUMMARY PLAN DESCRIPTION**

Please review each Plan Document and Summary Plan Description to ensure they your documents are consistent with your policies and administration of the plan.  Below is a list of common plan document topics to review:

* + - Are the plan eligibility criteria consistent with your practices?
    - Are excluded employees listed?  (i.e. part-time working less than 20 hours/week)
    - If applicable, is the duration of the claims run-out period correct (i.e. 30, 60, 90 days to submit claims)?
    - For Health Care Flexible Spending Account plans:
      * Does the plan have the grace period provision? If so, is it listed?  The grace period is the extended time period after the plan year ends during which employees can incur claims for the plan year.
      * Does the plan have the carryover provision?  The plan can allow for a $500 carryover of unused health care FSA funds from year to year—plans cannot offer both the grace period and the carryover.
    - Are all pre-tax benefits listed?  Any benefit offered as pre-tax must be identified (e.g. medical, dental, vision, general purpose FSA or limited FSA, and the health savings account or “HSA”).
    - Are you an employer subject to COBRA and are those rights listed?  We often find clients who previously did not have a separate or independent document disclosing COBRA rights.  Navia adds required COBRA boilerplate language to our templates, and you should ensure that this language is correct and consistent with your circumstances.

Once you have reviewed each Plan Document and Summary Plan Description, you must formally adopt the plan (sign and date the resolution on the last page or execute a similar adopting document for other entities such as LLCs or government entities).

The Summary Plan Description (SPD) must be furnished to all plan participants.  This applies to new enrollees and mid-year hires. If you are providing the SPD to employees via email or posting on the web or intranet, you must take steps reasonably calculated to ensure actual receipt and provide a paper version upon request.  Examples include requiring a confirmation of receipt, reviewing undeliverable notices, spot checking or surveying to confirm receipt.  We recommend a practice of retaining proof that the SPD was received (save emails or other notices).  If your employees do *not* have work-related computer access (i.e. their own computer and not a kiosk or common area computer) then you will need to obtain advanced consent to deliver these documents electronically.

**HIPAA NOTICE OF PRIVACY PRACTICES**

Participants in a group medical plan are required to receive a Notice of Privacy Practices.  In an effort to ensure participants receive the Notice and to assist you in your compliance efforts, Navia has provided the Notice of Privacy Practices as an appendix to the SPD.

If you have any questions regarding any of your plan documents, please contact us at employerservices@naviabenefits.com.