

1	Terms and Definitions, item 1	UPDATED DEFINITION – additional benefits: revised language to clarify intent
2	Terms and Definitions, item 2	UPDATED DEFINITION - ABC: added language to clarify individual serving as liaison is a school system employee
3	Terms and Definitions, item 3	UPDATED DEFINITION – annual enrollment: clarified period precedes the plan year; no substantive changes to existing process
4	Terms and Definitions, item 4	UPDATED DEFINITION – ACH: replaced automatic with automated
5	Terms and Definitions, item 6	UPDATED DEFINITION – business days: removed traditional workdays since weekdays are spelled out; added that weekends, in addition to State government holidays, are excluded
6	Terms and Definitions, item 7	UPDATED DEFINITION – calendar days: added text to clarify that State government holidays are included
7	Terms and Definitions, item 8	NEW ITEM: Added definition for Certificates of Coverage
8	Terms and Definitions, former item 10	INFORMATION DELETED - removed “Days” definition, relying instead on updated definitions for business days and calendar days
9	Terms and Definitions, item 12	NEW ITEM: Added definition for ePHI
10	Terms and Definitions, item 15	NEW ITEM: Added definition for HIPAA Notification Rule
11	Terms and Definitions, item 16	NEW ITEM: Added definition for HIPAA Privacy Rule
12	Terms and Definitions, item 17	NEW ITEM: Added definition for HIPAA Security Rule
13	Terms and Definitions, item 22	UPDATED DEFINITION - Local Education Plan Document: added text to clarify Insurance Committee approval of the Plan Document (PD)
14	Terms and Definitions, item 27	UPDATED DEFINITION - PHI: added text to clarify types of information considered to be PHI
15	Terms and Definitions, item 31	UPDATED DEFINITION – State Group Insurance Program: revised text to better explain the benefits that make up the program and the connection to the insurance committees
16	Terms and Definitions, item 34	UPDATED DEFINITION – The Tennessee Plan: corrected TCA reference
17	Terms and Definitions, item 35	UPDATED DEFINITION – Voluntary Benefits: revised text to remove fully paid by employee language to recognize possibility of state funding for some voluntary benefits
18	Terms and Definitions, item 36	UPDATED DEFINITION – Website: removed text that went beyond defining the term to include a description of information that can be found on the website
19	INTRODUCTION	UPDATED TEXT: streamlined language for clarity; added applicable TCA citations and references to newly added terms and definitions; added a “failure to comply” statement
20	SECTION 1 – Responsibilities of the Local Education Agency	UPDATED TEXT: formerly Section 1A, renumbered as Section 1
21	Section 1 – item 1	NEW ITEM: Added language to explain deadline for submitting intent to enroll is impacted by agency size
22	Section 1 – item 2	UPDATED TEXT: language has been moved from other sections of the previous MOU and combined here; Edison access is clarified

23	Section 1 – item 3	UPDATED TEXT: language has been moved from other sections of the previous MOU and combined here
24	Section 1 –item 4	UPDATED TEXT: language for voluntary benefits has been moved from other sections of the previous MOU and combined here; deadline for providing BA with notice of intent to enroll in voluntary benefits has been changed from July 1 to August 1; deadline for providing BA with intent to terminate participation in voluntary benefits has been changed from a 60-day written notice to August 1
25	Section 1 – item 5	UPDATED TEXT: language has been updated to include references to new terms and definitions and uniform enforcement of the provisions of all relevant policy documents
26	Section 1 – item 6	UPDATED TEXT: language revised to clarify that the LEA will apply same eligibility date criteria to all employees; example of not determining eligibility in a way that conflicts with policy documents has been expanded
27	Section 1 – item 7	UPDATED TEXT: language has been updated to clarify prohibition on offering other coverages; NOTE: new language has been added to clarify the process for requesting advance approval to offer additional benefit and the consequences for failing to cooperate or follow the process which may include terminating participation in the plan
28	Section 1 – item 9	UPDATED TEXT: language has been added to reflect the expectation that BA be informed of the appointment of a new fiscal officer and that the LEA advise BA of updates to contact information for directors or fiscal officers within 10 business days.
29	Section 1 – item 12	UPDATED TEXT: language added to allow that BA, with notice, may deduct from the LEA’s ACH debit account, expenses incurred because of the LEA’s failure to provide any information required by the MOU, including reimbursement of BA staff time devoted to resolving compliance issues
30	Section 1 – item 20	UPDATED TEXT: language revised to allow that an agency’s request for clarification of eligibility need not be in writing; new language added providing that the LEA must terminate persons ineligible for coverage <u>immediately</u> and <u>notify BA within three business days</u> of discovering that the persons were ineligible
31	Section 1 – item 30	UPDATED TEXT: removed language indicating that LEA may vary employer contribution by third party administrator; added language to stress that information provided by BA does not constitute legal advice
32	Section 1 – item 32	UPDATED TEXT: removed “hold harmless” language; revised LEA agrees to reimburse the state language to clarify that the LEA bears all responsibility for financial losses resulting from the LEA’s non-compliance with or violation of applicable law
33	Section 1 – item 33	NEW ITEM: the idea of audits is not new; added language just formalizes the expectation that the LEA will participate as necessary
34	SECTION 2 – Responsibilities of the Local Education Agency Regarding HIPAA and HITECH	UPDATED TEXT: formerly Section 1B, renumbered as Section 2; removed subheadings for HIPAA and HITECH Compliance and Privacy and Confidentiality and reorganized the items under one main heading

35	Section 2 – item 1	UPDATED TEXT: revised language to clarify that failure to complete mandatory training will result in suspension of an individual's Edison insurance benefits access
36	SECTION 3 – Responsibilities of the Agency Benefits Coordinator	UPDATED TEXT: formerly Section 2, renumbered as Section 3
37	Section 3 – item 2	UPDATED TEXT: revised bulleted items to clarify expectations related to employee orientation; most items are reworded or have been moved around within the list without changing context; new items include a statement added to formalize the expectation that ABCs review each item on the Employee Insurance Checklist with the employee and clearly articulating the 30-day deadline for new hire enrollment; language clarifies that the ABC is to ensure that employees receive all orientation materials provided by BA in print or that access to electronic versions is provided.
38	Section 3 – item 3	NEW ITEM: text added requiring ABCs, upon request, to provide BA with all orientation materials the LEA has given to new employees
39	Section 3 – item 4	NEW ITEM: text added requiring ABCs to participate in conference calls and meetings with BA staff based on a schedule set by BA; ABCs also required to review all notices emailed from BA and check the website weekly to review all new BA postings
40	Section 3 – item 5	NEW ITEM: text added requiring ABCs to promptly review notices and updates from BA, including notices regarding annual premium increase or benefit changes and updates to the PD
41	Section 3 – item 6	UPDATED TEXT: text revised to clarify what training is required of ABCs and when
42	Section 3 – item 7	UPDATED TEXT: text revised to clarify MOU and HIPAA specific training requirements
43	Section 3 – item 8	UPDATED TEXT: text moved from another location in the previous MOU; text added requiring that ABCs be familiar with insurance benefits and eligibility provisions described in any applicable Certificates of Coverage as well as the PD
44	Section 3 – item 13	UPDATED TEXT: corrected Plan Document section references to align with renumbering of PD sections since the last MOU was issued
45	Section 3 – item 16	UPDATED TEXT: revised text to explain that an ABC's access to benefits information in Edison will not be reinstated following failure to timely comply with a yearly security audit until a new, signed Edison Benefits User Security Access form is received from the agency for each ABC
46	SECTION 3 – Responsibilities of BA	DELETED ITEM: the section labeled as Section 3 in the previous MOU has been deleted; items have been moved and incorporated into newly renumbered sections of the updated MOU
47	MISCELLANEOUS	Various other updates involving non-substantive changes have been made throughout the document, such as renumbering to accommodate other changes, inserting acronyms or abbreviations, deleting non-substantive, extraneous text, and updating web links