Legal Notice



Effective Date: January 2026

Legal Notices About CommonSpirit Health® Benefits

You do not need to take action on these notices.

CommonSpirit Health is required by law to provide the following. It's provided for informational purposes only. We recommend you carefully read this document and file it in a safe place for future use, if needed. If you have any questions, call the CommonSpirit Health Benefits Contact Center at **(855) 475-4747**, option 1.

For additional information about the CommonSpirit Health benefit plans, go to MyBenefits found on EmployeeCentral at home.commonspirit.org/employeecentral/mybenefits

Availability of Summary Health Information

As an employee, the health benefits available to you represent a significant component of your compensation package. They also provide important protection for you and your family in the case of illness or injury.

Your plan offers a series of health coverage options. Choosing a health coverage option is an important decision. To help you make an informed choice, your plan makes available a Summary of Benefits and Coverage (SBC), which summarizes important information about any health coverage option in a standard format, to help you compare across options.

For congregations, the SBC is available at http://chibenefitplans.net. A paper copy is also available, free of charge, by contacting your local HR representative.

For COBRA participants, the SBC is available at http://chibenefitplans.net. A paper copy is also available, free of charge, by contacting your local HR representative.

Important Information about the Notice on Health Insurance Marketplace Coverage Options

The Patient Protection and Affordable Care Act ("Affordable Care Act"), also known as health care reform, was enacted in March 2010. One of the provisions of the Affordable Care Act is the Marketplace options.

The Marketplace notice provides you with instructions on how to access information about the new Marketplace options.

For congregations, the Marketplace notice is available online at http://chibenefitplans.net. A paper copy is also available, free of charge, by contacting your local HR representative.

For COBRA participants, the Marketplace notice is available at http://chibenefitplans.net. A paper copy is also available, free of charge, by contacting your local HR representative.

You are encouraged to visit www.healthcare.gov to obtain important information that could apply to you regarding the Affordable Care Act and the Marketplace options where consumers can shop for insurance.

Keep in mind, if you decide to enroll in one of the Marketplace options, you will pay the full cost. CommonSpirit Health will not contribute toward your coverage through the Marketplace.

If you have questions, call (800) 318-2596 (TTY: (855) 889-4325 or visit <u>www.healthcare.gov.</u>

See inside for additional legal notices.

Important Notice from CommonSpirit Health About Your Prescription Coverage and Medicare

If you qualify for Medicare, please read and keep this important notice. This notice has information about your current prescription drug coverage under the CommonSpirit Health Medical Plan and about your options under Medicare's prescription drug coverage. This information can help you decide whether or not you want to join a Medicare drug plan. Information about where you can get help to make decisions about your prescription drug coverage is at the end of this notice.

There are two important things you need to know about your current coverage and Medicare's prescription drug coverage:

- Medicare prescription drug coverage became available in 2006 to everyone with Medicare. You can get this coverage if you join a Medicare Prescription Drug Plan or join a Medicare Advantage Plan (like an HMO or PPO) that offers prescription drug coverage. All Medicare drug plans provide at least a standard level of coverage set by Medicare. Some plans may also offer more coverage for a higher monthly premium.
- 2. CommonSpirit Health has determined that the prescription drug coverage offered by the CommonSpirit Health Medical Plan is, on average for all plan participants, expected to pay out as much as the standard Medicare prescription drug coverage will pay and is considered Creditable Coverage. Because your existing coverage is on average at least as good as standard Medicare prescription drug coverage, you can keep your existing coverage and will not pay extra if you later decide to enroll in Medicare prescription drug coverage. Read this notice carefully it explains your options.

When Can You Join A Medicare Drug Plan?

You can join a Medicare drug plan when you first become eligible for Medicare and each year from October 15 through December 7. However, if you lose your current creditable prescription drug coverage through no fault of your own, you will also be eligible for a two (2) month Special Enrollment Period to join a Medicare drug plan. Prescription drug coverage is available to everyone with Medicare through Medicare prescription drug plans. All Medicare prescription drug plans will provide at least a standard level of coverage set by Medicare. Some plans might also offer more coverage for a higher monthly premium.

What Happens to Your Current Coverage If You Decide to Join a Medicare Drug Plan?

You should compare your current coverage, including which drugs are covered, with the coverage and cost of the plans offering Medicare prescription drug coverage in your area. In addition, your current coverage pays for other health expenses, in addition to prescriptions, and you will still be eligible to receive all your current health and prescription drug benefits if you choose to enroll in a Medicare prescription drug plan.

However, if you decide to join a Medicare drug plan, and you are enrolled in the CommonSpirit Health High Deductible Health Plan with HSA (if eligible), when you begin receiving Medicare benefits, you will no longer be eligible to contribute to your health savings account.

If you do decide to join a Medicare drug plan and drop your current CommonSpirit Health coverage, be aware that you and your dependents will not be able to change your election until the next annual enrollment period unless you experience a change in status as defined by the Internal Revenue Service. See the section "Special Enrollment Rights" below for more information.

When Will You Pay A Higher Premium (Penalty) To Join A Medicare Drug Plan?

You can choose to join a Medicare prescription drug plan later without paying a penalty as long as you don't go 63 days or longer without prescription drug coverage that is at least as good as Medicare's prescription drug coverage.

Starting with the end of the last month that you were first eligible to join a Medicare drug plan but didn't join, if you go 63 continuous days or longer without prescription drug coverage that's creditable, your monthly premium may go up by at least 1% of the Medicare base beneficiary premium per month for every month that you did not have that coverage.

For example, if you go nineteen months without creditable coverage, your premium may consistently be at least 19% higher than the Medicare base beneficiary premium. You may have to pay this higher premium (penalty) as long as you have Medicare prescription drug coverage. In addition, you may have to wait until the following October to join.

For More Information About Your Current Prescription Drug Coverage...

Please contact the Capital Rx Customer Service Team at (844) 306-6254.

For More Information About This Notice...

Call CommonSpirit Health Benefits Contact Center at (855) 475-4747, option 1 (a toll-free number). You may receive this notice at other times in the future, such as before the next period you can enroll in Medicare prescription drug coverage or if this coverage changes. You may also request a copy of this notice free of charge.

For More Information About Your Options Under Medicare Prescription Drug Coverage...

More detailed information about Medicare plans that offer prescription drug coverage is in the "Medicare & You" handbook. You'll get a copy of the handbook in the mail every year from Medicare. You may also be contacted directly by Medicare drug plans.

For more information about Medicare prescription drug coverage, visit <u>www.medicare.gov</u> or call:

- Your State Health Insurance Assistance Program (see the inside back cover of your copy of the "Medicare & You" handbook for their telephone number) for personalized help; or
- 800-MEDICARE (800) 633-4227.
 TTY users should call (877) 486-2048.

If you have limited income and resources, extra help paying for Medicare prescription drug coverage is available. For information about this extra help, visit Social Security on the web at www.socialsecurity.gov, or call (800) 772-1213 or (TTY (800) 325-0778.

Date: October 2025 Name of Entity/Sender: CommonSpirit Health 3900 Olympic Boulevard, Suite 300 Erlanger, KY 41018-1099

Special Enrollment Rights

If you are declining enrollment for yourself or your dependents (including your spouse) because of other health insurance or group health plan coverage, you may be able to enroll yourself and your dependents in the CommonSpirit Health ERISA Welfare Benefit Plan if you or your dependents lose eligibility for that other coverage (or if the employer stopped contributing towards your or your dependents' other coverage). However, you must request enrollment 31 days after your or your dependents' other coverage ends (or after the employer stops contributing toward the other coverage).

In addition, if you have a new dependent as a result of marriage, birth, adoption, or placement for adoption, you may be able to enroll yourself and your dependents. However, you must request enrollment within the following timeframes:

- 31 days of the wedding date,
- 60 days of the birth, adoption, or placement for adoption.

To request special enrollment or obtain more information, call the CommonSpirit Health Benefits Contact Center at (855) 475-4747, option 1.

Health Insurance Portability and Accountability Act of 1996 ("HIPAA")

HIPAA provides for protection of personal health information and stipulates who may have access to the information. Protected health information includes identifiable information about you and your covered dependents, and your patient records.

Protected health information can only be used or disclosed for purposes of Plan operation or benefits delivery or with the consent or authorization of the individual. The Plan administrator may grant access to protected health information only as necessary to fulfill its obligations to the Plan. In no way may protected health information be disclosed for employment purposes. In addition, you have the right to request a copy of your health information and may make changes to correct errors. You may also request an accounting of all disclosures of your protected health information.

The CommonSpirit Health Notice of Health Information Privacy Practices is available to you at:

- Log into MyBenefits at <u>home.commonspirit.org/employeecentral/my</u> <u>benefits</u>
- Scroll to bottom of the page, Select "CSH Privacy Notice"
- You can also request a copy by writing to:

CommonSpirit Health Attn: CommonSpirit Health Benefits

Contact Center Dept.: CSH

P.O. Box 981901 El Paso, TX 79998

Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA")

USERRA protects the job rights of individuals who voluntarily or involuntarily leave employment positions to undertake military service or certain types of service in the National Disaster Medical System. USERRA also prohibits employers from discriminating against past and present members of the uniformed services, and applicants to the uniformed services.

Reemployment Rights

You have the right to be reemployed in your civilian job if you leave that job to perform service in the uniformed services and you:

- Ensure your employer receives advance written or verbal notice of your service;
- Have five years or less of cumulative service in the uniformed services while with your employer;
- Return to work or apply for reemployment in a timely manner after conclusion of service; and
- Have not been separated from service with a disqualifying discharge or under other than honorable conditions.

If you are eligible to be reemployed, you must be restored to the job and benefits you would have attained if you had not been absent due to military service or, in some cases, a comparable job.

For more information about your reemployment rights, call the CommonSpirit Health Benefits Contact Center at (855) 475-4747, option 1.

Right to be Free From Discrimination and Retaliation,

If you:

- Are a past or present member of the uniformed services;
- Have applied for membership in the uniformed services; or
- Are obligated to serve in the uniformed services, then an employer may not deny you initial employment; reemployment; retention in employment; promotion; or any benefit of employment, because of this status.

In addition, an employer may not retaliate against anyone assisting in the enforcement of USERRA rights, including testifying or making a statement in connection with a proceeding under USERRA, even if that person has no service connection.

Health Insurance Protection

If you leave your job to perform military service, you have the right to elect to continue your existing employer-based health plan coverage for you and your dependents for up to 24 months while in the military. Even if you don't elect to continue coverage during your military service, you have the right to be reinstated in your employer's health plan when you are reemployed, generally without any waiting periods or exclusions (e.g., pre-existing condition exclusions) except for service-connected illnesses or injuries.

Enforcement

The U.S. Department of Labor, Veterans' Employment and Training Service (VETS) is authorized to investigate and resolve complaints of USERRA violations. For assistance in filing a complaint, or for any other information on USERRA, contact VETS at 866-4-USA-DOL or visit its website at www.dol.gov/vets.

An interactive online USERRA advisor can be viewed at https://webapps.dol.gov/elaws/vets/userra/.

If you file a complaint with VETS and VETS is unable to resolve it, you may request that your case be referred to the Department of Justice for representation. You may also bypass the VETS process and bring a civil action against an employer for violations of USERRA. The rights listed here may vary depending on the circumstances. This notice was prepared by VETS, and may be viewed on the Internet at

www.dol.gov/vets/programs/userra/poster.htm.

Women's Health and Cancer Rights Act of 1998 ("WHCRA")

If you have had or are going to have a mastectomy, you may be entitled to certain benefits under the Women's Health and Cancer Rights Act of 1998 (WHCRA). For individuals receiving mastectomy- related benefits, coverage will be provided in a manner determined in consultation with the attending physician and the patient, for:

- 1. all stages of reconstruction of the breast on which the mastectomy was performed;
- 2. surgery and reconstruction of the other breast to produce a symmetrical appearance;
- 3. prostheses, and
- 4. treatment of physical complications of the mastectomy, including lymphedemas.

These benefits will be provided subject to the same deductibles and coinsurance applicable to other medical and surgical benefits provided under this plan. If you would like more information on your benefits, please call the CommonSpirit Health Benefits Contact Center at (855) 475-4747, option 1.

Your Rights to Additional Information

You have the right to receive a copy of the full annual report, or any part thereof, on request. Financial information and information on payments to service providers are included in the full annual report. To obtain a copy of the full annual report, or any part thereof, write or call the office of the

Director of Health and Welfare Plans, 3900 Olympic Boulevard, Suite 300 Erlanger, Kentucky 41018-1099 (859) 594-3000.

The charge to cover copying costs will be \$1.50 for the full annual report, or \$0.25 per page for any part thereof.

You also have the legally protected right to examine the annual report at the main office of the Plan, CommonSpirit Health, 198 Inverness Drive West, Englewood, CO 80112, and at the U.S. Department of Labor in Washington, D.C., or to obtain a copy from the U.S. Department of Labor upon payment of copying costs.

Requests to the Department should be addressed to

Public Disclosure Room, Room N5638 Employee Benefits Security Administration U.S. Department of Labor, 200 Constitution Avenue, N.W. Washington, D.C. 20210.

Premium Assistance Under Medicaid and the Children's Health Insurance Program ("CHIP")

Offer Free or Low-Cost Health Coverage to Children and Families

If you or your children are eligible for Medicaid or CHIP and you're eligible for health coverage from your employer, your state may have a premium assistance program that can help pay for coverage, using funds from their Medicaid or CHIP programs. If you or your children aren't eligible for Medicaid or CHIP, you won't be eligible for these premium assistance programs, but you may be able to buy individual insurance coverage through the Health Insurance Marketplace. For more information, visit www.healthcare.gov.

If you or your dependents are already enrolled in Medicaid or CHIP and you live in a state listed below, contact your state Medicaid or CHIP office to find out if premium assistance is available. If you or your dependents are NOT currently enrolled in Medicaid or

CHIP, and you think you or any of your dependents might be eligible for either of these programs, contact your state Medicaid or CHIP office or dial (877) KIDS NOW or www.insurekidsnow.gov to find out how to apply. If you qualify, ask your state if it has a program that might help you pay the premiums for an employer-sponsored plan.

If you or your dependents are eligible for premium assistance under Medicaid or CHIP, as well as eligible under your employer plan, your employer must allow you to enroll in your employer plan if you aren't already enrolled. This is called a "special enrollment" opportunity, and you must request coverage within 60 days of being determined eligible for premium assistance. If you have questions about enrolling in your employer plan, contact the Department of Labor at www.askebsa.dol.gov or call (866) 444-EBSA (3272).

If you live in one of the following states, you may be eligible for assistance paying your employer health plan premiums. The following list of states is current as of July 31, 2025. Contact your state for more information on eligibility.

ALABAMA – Medicaid	ALASKA – Medicaid
Website: http://myalhipp.com/ Phone: 1-855-692-5447	The AK Health Insurance Premium Payment Program Website: http://myakhipp.com/ Phone: 1-866-251-4861 Email: CustomerService@MyAKHIPP.com Medicaid Eligibility: https://health.alaska.gov/dpa/Pages/default.aspx
ARKANSAS – Medicaid	CALIFORNIA – Medicaid
Website: http://myarhipp.com/ Phone: 1-855-MyARHIPP (855-692-7447)	Health Insurance Premium Payment (HIPP) Program Website: http://dhcs.ca.gov/hipp Phone: 916-445-8322 Fax: 916-440-5676 Email: hipp@dhcs.ca.gov
COLORADO – Health First Colorado (Colorado's Medicaid Program) & Child Health Plan Plus (CHP+)	FLORIDA – Medicaid
Health First Colorado Website: https://www.healthfirstcolorado.com/ Health First Colorado Member Contact Center: 1-800-221-3943/State Relay 711 CHP+: https://hcpf.colorado.gov/child-health-plan-plus CHP+ Customer Service: 1-800-359-1991/State Relay 711 Health Insurance Buy-In Program (HIBI): https://www.mycohibi.com/ HIBI Customer Service: 1-855-692-6442	Website: https://www.flmedicaidtplrecovery.com/flmedicaidtplrecovery.com/hipp/index.html Phone: 1-877-357-3268
GEORGIA – Medicaid	INDIANA – Medicaid
GA HIPP Website: https://medicaid.georgia.gov/health-insurance-premiu m-payment-program-hipp Phone: 678-564-1162, Press 1 GA CHIPRA Website: https://medicaid.georgia.gov/programs/third-party-liabil ity/childrens-health-insurance-program-reauthorization -act-2009-chipra Phone: 678-564-1162, Press 2	Health Insurance Premium Payment Program All other Medicaid Website: https://www.in.gov/medicaid/ http://www.in.gov/fssa/dfr/ Family and Social Services Administration Phone: 1-800-403-0864 Member Services Phone: 1-800-457-4584
IOWA – Medicaid and CHIP (Hawki)	KANSAS – Medicaid
Medicaid Website: <u>lowa Medicaid Health & Human Services</u> Medicaid Phone: 1-800-338-8366 Hawki Website: <u>Hawki - Healthy and Well Kids in Iowa Health & Human Services</u>	Website: https://www.kancare.ks.gov/ Phone: 1-800-792-4884 HIPP Phone: 1-800-967-4660

KENTUCKY – Medicaid	LOUISIANA – Medicaid
Kentucky Integrated Health Insurance Premium Payment Program (KI-HIPP) Website: https://chfs.ky.gov/agencies/dms/member/Pages/kihipp. aspx Phone: 1-855-459-6328 Email: KIHIPP.PROGRAM@ky.gov KCHIP Website: https://kynect.ky.gov Phone: 1-877-524-4718 Kentucky Medicaid Website: https://chfs.ky.gov/agencies/dms	Website: www.medicaid.la.gov or www.ldh.la.gov/lahipp Phone: 1-888-342-6207 (Medicaid hotline) or 1-855-618-5488 (LaHIPP)
MAINE – Medicaid	MASSACHUSETTS – Medicaid and CHIP
Enrollment Website: https://www.mymaineconnection.gov/benefits/s/?language=en_US Phone: 1-800-442-6003 TTY: Maine relay 711 Private Health Insurance Premium Webpage: https://www.maine.gov/dhhs/ofi/applications-forms Phone: 1-800-977-6740 TTY: Maine relay 711	Website: https://www.mass.gov/masshealth/pa Phone: 1-800-862-4840 TTY: 711 Email: masspremassistance@accenture.com
MINNESOTA – Medicaid	MISSOURI – Medicaid
Website: https://mn.gov/dhs/health-care-coverage/ Phone: 1-800-657-3672	Website: http://www.dss.mo.gov/mhd/participants/pages/hipp.htm Phone: 573-751-2005
MONTANA – Medicaid	NEBRASKA – Medicaid
Website: http://dphhs.mt.gov/MontanaHealthcarePrograms/HIP Phone: 1-800-694-3084 Email: HHSHIPPProgram@mt.gov	Website: http://www.ACCESSNebraska.ne.gov Phone: 1-855-632-7633 Lincoln: 402-473-7000 Omaha: 402-595-1178
NEVADA – Medicaid	NEW HAMPSHIRE – Medicaid
Medicaid Website: http://dhcfp.nv.gov Medicaid Phone: 1-800-992-0900	Website: https://www.dhhs.nh.gov/programs-services/medicaid/healt h-insurance-premium-program Phone: 603-271-5218 Toll free number for the HIPP program: 1-800-852-3345, ext. 15218 Email: DHHS.ThirdPartyLiabi@dhhs.nh.gov
NEW JERSEY – Medicaid and CHIP	NEW YORK – Medicaid
Medicaid Website: http://www.state.nj.us/humanservices/ dmahs/clients/medicaid/ Phone: 1-800-356-1561 CHIP Premium Assistance Phone: 609-631-2392 CHIP Website: http://www.njfamilycare.org/index.html CHIP Phone: 1-800-701-0710 (TTY: 711)	Website: https://www.health.ny.gov/health_care/medicaid/Phone: 1-800-541-2831

NORTH CAROLINA – Medicaid	NORTH DAKOTA – Medicaid
Website: https://medicaid.ncdhhs.gov/ Phone: 919-855-4100	Website: https://www.hhs.nd.gov/healthcare Phone: 1-844-854-4825
OKLAHOMA – Medicaid and CHIP	OREGON – Medicaid and CHIP
Website: http://www.insureoklahoma.org Phone: 1-888-365-3742	Website: http://healthcare.oregon.gov/Pages/index.aspx Phone: 1-800-699-9075
PENNSYLVANIA – Medicaid and CHIP	RHODE ISLAND – Medicaid and CHIP
Website: https://www.pa.gov/en/services/dhs/apply-for-medicaid-health-insurance-premium-payment-program-hipp.html Phone: 1-800-692-7462 CHIP Website: Children's Health Insurance Program (CHIP) (pa.gov) CHIP Phone: 1-800-986-KIDS (5437)	Website: http://www.eohhs.ri.gov/ Phone: 1-855-697-4347, or 401-462-0311 (Direct RIte Share Line)
SOUTH CAROLINA – Medicaid	SOUTH DAKOTA - Medicaid
Website: https://www.scdhhs.gov Phone: 1-888-549-0820	Website: http://dss.sd.gov Phone: 1-888-828-0059
TEXAS – Medicaid	UTAH – Medicaid and CHIP
Website: Health Insurance Premium Payment (HIPP) Program Texas Health and Human Services Phone: 1-800-440-0493	Utah's Premium Partnership for Health Insurance (UPP) Website: https://medicaid.utah.gov/upp/ Email: upp@utah.gov Phone: 1-888-222-2542 Adult Expansion Website: https://medicaid.utah.gov/expansion/ Utah Medicaid Buyout Program Website: https://medicaid.utah.gov/buyout-program/ CHIP Website: https://chip.utah.gov/
VERMONT- Medicaid	VIRGINIA – Medicaid and CHIP
Website: <u>Health Insurance Premium Payment (HIPP)</u> <u>Program Department of Vermont Health Access</u> Phone: 1-800-250-8427	Website: https://coverva.dmas.virginia.gov/learn/premium-assistance /famis-select https://coverva.dmas.virginia.gov/learn/premium-assistance /health-insurance-premium-payment-hipp-programs Medicaid/CHIP Phone: 1-800-432-5924
WASHINGTON – Medicaid	WEST VIRGINIA – Medicaid and CHIP
Website: https://www.hca.wa.gov/Phone: 1-800-562-3022	Website: https://dhhr.wv.gov/bms/ http://mywvhipp.com/ Medicaid Phone: 304-558-1700 CHIP Toll-free phone: 1-855-MyWVHIPP (1-855-699-8447)

WISCONSIN – Medicaid and CHIP	WYOMING – Medicaid
Website: https://www.dhs.wisconsin.gov/badgercareplus/p-10095. htm Phone: 1-800-362-3002	Website: https://health.wyo.gov/healthcarefin/medicaid/programs-and-eligibility/ Phone: 1-800-251-1269

To see if any other states have added a premium assistance program since July 31, 2025, or for more information on special enrollment rights, contact either:

U.S. Department of Labor

Employee Benefits Security Administration www.dol.gov/agencies/ebsa (866) 444-EBSA (3272)

U.S. Department of Health and Human Services Centers for Medicare & Medicaid Services **www.cms.hhs.gov**

(877) 267-2323, Menu Option 4, Ext. 61565

Paperwork Reduction Act Statement

According to the Paperwork Reduction Act of 1995 (Pub. L. 104-13) (PRA), no persons are required to respond to a collection of information unless such collection displays a valid Office of Management and Budget (OMB) control number. The Department notes that a federal agency cannot conduct or sponsor a collection of information unless it is approved by OMB under the PRA, and displays a currently valid OMB control number, and the public is not required to respond to a collection of information unless it displays a currently valid OMB control number. See 44 U.S.C. 3507. Also, notwithstanding any other provisions of law, no person shall be subject to penalty for failing to comply with a collection of information if the collection of information does not display a currently valid OMB control number. See 44 U.S.C. 3512.

The public reporting burden for this collection of information is estimated to average approximately seven minutes per respondent. Interested parties are encouraged to send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Employee Benefits Security Administration, Office of Policy and Research, Attention: PRA Clearance Officer, 200 Constitution Avenue, N.W., Room N-5718, Washington, DC 20210 or email ebsa.opr@dol.gov and reference the OMB Control Number 1210-0137.