



May 21, 2009

Laura Lively Insurance Brokerage , Inc.
54 Main Street
Lebminster, MA 01453

Re: S & S Staffing, L.L.C.

Dear Ms. Lively:

I am writing in regard to the recent audit of S & S Staffing, L.L. C.

You have asked me to comment on a provision in Fallon Community Health Plan's ("FCHP") Administrative Handbook. The provision addresses adding employees to group coverage. The provision states: "He or she must be considered a full-time employee (working an average of 30 or more hours per week)..."

Please be advised that the FCHP Administrative Handbook is written by FCHP to be used as a guide by employers in administering their group health plans. It is a generic document provided to all employers when they place their coverage with FCHP. The above provision should not be taken as a binding statement that any given group's threshold to be considered full-time is precisely 30 hours. Where otherwise permissible, a group may set its threshold at more than 30 hours. FCHP, on an exception basis, may also consider allowing a group to set its full-time threshold below 30 hours. It is also important to note that employees working on a temporary or substitute basis, or hired to work for a period of less than five months, are not required to be offered coverage.

If you have any questions, please contact me at (508) 368-9384.

Sincerely,

A handwritten signature in black ink that reads "James Gentile". The signature is written in a cursive style with a large, sweeping "J" and "G".

James Gentile
Sr. Manager, Regulatory & Legislative Affairs