

Course Outline

What to Expect from a Health Plan Investigation

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1. Background on Employee Benefits Security Administration (EBSA) (5 minutes)
 - a. General organizational overview
 - b. Enforcement strategy
2. ERISA and fiduciary responsibility (15 minutes)
 - a. ERISA basics
 - b. Enforcement and jurisdiction
 - c. ERISA reporting and disclosure for group health plans
 - d. Plan fiduciaries
3. Types of Investigations (5 minutes)
4. Health Benefits Security Project (10 minutes)
 - a. HBSP basics
 - b. Examples of group health plan violations
5. EBSA investigation process (10 minutes)
 - a. General process for civil plan investigations
 - b. Basic health plan documents
 - c. Subpoenas
 - d. Findings and follow up
6. Correction & voluntary fiduciary compliance program (10 minutes)
 - a. Corrections pre-investigation
 - b. Corrections during investigation
 - c. Voluntary Fiduciary Correction Program (VFCP)
7. Compliance assistance and other resources (5 minutes)
 - a. Questions