



Issued date: 05/06/16

On April 6, 2016, the Departments of Labor (“DOL”), the Internal Revenue Service (“IRS”), and Health and Human Services (“HHS”) (collectively, “the Departments”) announced the final version of the new Summary of Benefits and Coverage (“SBC”) template and associated documents.

Health plans are required to use the April 2017 edition of the SBC template and associated documents beginning on the first day of the **first open enrollment period that begins on or after April 1, 2017** with respect to coverage for plan years beginning on or after that date.

Highlights of Changes

- The April 2017 template is five pages (two and one-half double-sided pages) compared to the current six page version.
- In the coverage examples on the template, the cost-sharing language is more specific when copayments and coinsurance are applied to coverage.
- The description of an embedded deductible has been clarified.

- Each of the terms in the uniform glossary of terms has an independent web link so the key terms in electronic versions of the SBC can be linked directly to their definitions.
- Coverage example calculators and their instructions have been updated.

Employer Action

Employers should continue to comply with the current rules and be ready to apply the new rules beginning April 2017.

- Employers with insured plans should make sure that the carrier is using the appropriate SBC template version.
- Employers with self-funded plans should make sure that they are using the correct SBC template version. If working with a TPA to develop the SBC, ensure the TPA is using the correct SBC.

Further Information

For the SBC regulations and templates on the DOL's EBSA website, see "Templates, Instructions, and Related Materials – Currently Applicable" v. "Templates, Instructions, and Related Materials – for use on or after 04/01/17 (Final)" at:

<http://www.dol.gov/ebsa/healthreform/regulations/summaryofbenefits.html>.

For the SBC materials and supporting documents on the HHS website, see "SBC Materials and Supporting Documents (Authorized for use on and after April 1, 2017)" v. "SBC Materials and Supporting Documents (Authorized for use prior to April 1, 2017)" at:

<https://www.cms.gov/ccio/Resources/Forms-Reports-and-Other-Resources/index.html#Summary%20of%20Benefits%20and%20Coverage%20and%20Uniform%20Glossary>.

