Kilpatrick

**NOVEMBER 17, 2011**

# SBC Requirements Delayed

A few weeks ago I reported that DOL, IRS and CMS were considering a delay in the Summary of Benefits and Coverage requirements. Currently, in the proposed regulations, the agencies anticipated an effective date of March 23, 2012. This evening DOL announced that the effective date of the SBC requirements would be delayed when the final regulations were issued. However, DOL did not provide what that effective date would be. Rather, DOL indicated that when the final regulations are released, plans will be given a "sufficient time" to comply. Based on prior informal conversations, I anticipate the final regulations to be issued in early 2012 with a potential effective date being in late 2012 or January 1, 2013. A copy of the DOL release can be found here: http://www.dol.gov/ebsa/faqs/faq-aca7.html