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SBC Templates Delayed But Not Final Regulations

The Agencies announced yesterday (click here for release) that the SBC final regulations will be published soon and will apply to plan years beginning on or after January 1, 2016. However, the updated SBC templates will not be available until 2016, meaning that they won't apply until plan years beginning on or after January 1, 2017.

While this is welcome news and it means that SBC templates will not have to be updated for this year's open enrollment - it doesn't necessarily mean that there won't be any changes for SBCs this year. The Agencies made a special point of saying that the final regulations would apply to coverage offered in open enrollment in Fall 2015 (for coverage that is effective January 1, 2016). Thus, it is certainly possible that wording modifications or distribution modifications could be made to SBCs in the final regulations when they are issued. However, any major wording or language changes to SBC templates will likely occur when the Agencies issue the updated templates in 2016.