JULY 12, 2017

Updated SBC Templates Apply for 2018 Open Enrollment

The new SBC templates released last year are required for open enrollment periods beginning on and after April 1, 2017. For health plans and employers with calendar year plans, this means the updated SBC templates and related requirements apply to 2018 open enrollment occurring this Fall.

Given the current House and Senate "repeal and replace" ACA legislation, many employers are wondering if they need to take the time to revise their SBCs to comply with the new template and requirements. The short answer is use of the new SBC templates are still required. Both the House-passed legislation and the current legislation in consideration by the Senate have no effect on the SBC requirements. At this point, no one knows whether any health legislation will pass this year, and what such legislation may include. However, even if health legislation is passed by Congress and signed by the President this year, it likely would be after the point in time that current law requires health plans to provide SBCs based on the updated templates.

Therefore, health plans and employers should revise their SBCs to comply with the updated SBC templates and requirements for the 2018 open enrollment period. The new SBC templates and instructions can be found here.