AUGUST 21, 2012

SBC Reminder

I recently spoke at the ECFC meeting last week - with one of the major topics being SBCs. It is important to keep in mind that seperate SBCs will be needed for the following arrangements:

1. Stand-alone HRAs.
2. Integrated HRAs where the HRA is seperately administered (i.e., not administered by the insurer).
3. Employee Assistance Programs (EAPs) where the EAP is providing assessment or treatment.

In these situations, significant revisions will be needed to the SBC template, so that the SBC works for these arrangements and is not misleading. However, you still need to retain the outline of the SBC in order to have good faith compliance with the rules. As always, this will be a delicate balancing act.