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Revised SBCs Finalized (for use on or after April 2017)

Recently, we summarized the proposed revisions to the Summary of Benefits and Coverage template. This week, the agencies issued the final SBCs and related documents that must be used 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. In other words, for calendar year plans, these revised forms must be used during the open enrollment associated with the 2018 plan year.

The final SBC template is substantially the same as the proposed form. There are some changes to the proposed instructions, such as with respect to the updated information that is provided regarding deductibles. One nice feature of the new forms is that plans can electronically link defined terms in the SBC directly to the term's definition on the HHS webpage (plans are not required to include the embedded links, but the model template includes embedded hyperlinks).

The new forms, instructions and associated documents can be found at http://www.dol.gov/ebsa/healthreform/regulations/summaryofbenefits.html.