



## SPECIAL BULLETIN

### ***Proposed Regulations Effective Date and Revisions to SBC Template and Documents Delayed***

On December 30, 2014, the Internal Revenue Service (IRS); Employee Benefits Security Administration (EBSA) and Centers for Medicare & Medicaid Services (CMS) ("the Departments") [published a proposed rule](#) regarding the summary of benefits and coverage (SBC) and the uniform glossary for group health plans and health insurance coverage in the group and individual markets under the *Patient Protection and Affordable Care Act (ACA)*.

The proposed regulations related to the SBC revisions originally were to be effective the first day of the first plan year that begins on or after September 1, 2015. A redline showing changes in the proposed regulation to the current regulation is available by "[clicking here](#)."

On March 30, 2015, the Departments issued a Frequently Asked Question (FAQ) stating that the proposed regulations would be finalized in the near future. As the proposed regulations relate to provisions other than the SBC revisions discussed in this publication, the effective date would be the first day of the first plan year that *begins on or after January 1, 2016*. The FAQ can be viewed at: [FAQs about Affordable Care Act Implementation \(Part XXIV\)](#).

The FAQ also stated that the Departments anticipate the new SBC template and associated documents will be finalized by January 2016 and will apply to coverage that would renew or begin on the first day of the first plan year that *begins on or after January 1, 2017*. The delayed SBC effective date allows the Departments to utilize consumer testing and receive public comments before finalizing revisions to the SBC template and associated documents.

The delay in switching SBC templates will be welcome news as these things often take more time in the real-world than estimates of time in proposed regulations.

\* \* \*