

## BENEFIT NEWS BRIEFS

### ***New Proposed SBC Templates and Materials Posted Online Would Apply Beginning 2017 Plan Year***

The *Affordable Care Act (ACA)* requires group health plans, among others, to provide participants with a summary of benefits and coverage (SBC) that “accurately describes the benefits and coverage under the applicable plan or coverage.”

Recently, the Departments of Labor, Health and Human Services (HHS), and the Treasury (the Departments) posted new final proposed SBC templates, instructions and related materials which would apply beginning in the 2017 plan year. [Comments](#) are due by March 26, 2016.

#### **Background to the Proposed SBC Documents**

A [proposed SBC regulation](#) at 29 CFR 2590.715–2715 was published on August 22, 2011 with accompanying SBC templates, instructions, and related materials for implementing the SBC disclosure provisions. A [final rule](#) was published on February 14, 2012. A [second proposed regulation](#) was published on December 30, 2014 to propose revisions to the regulation as well as the templates, instructions and related materials. A [final rule](#), without final revisions to the SBC template and associated documents, was published on June 16, 2015.

On February 26, 2016, in an effort to finalize the templates, instructions and related materials, the Departments published proposed final SBC documents with a March 26, 2016 comment period due date. Links to the proposed documents for group health plans are below. The proposed SBC adds a coverage example for a foot fracture. Only the CMS webpage has the Proposed Coverage Examples.

Direct links to the documents are provided on the next page. The documents are also available at:

- <https://www.cms.gov/ccii/resources/Regulations-and-Guidance/index.html>  
(at Summary of Benefits and Coverage and Uniform Glossary) or
- <http://www.dol.gov/ebsa/healthreform/regulations/summaryofbenefits.html>

A "redline" version comparing the prior SBC instructions to the new proposed SBC instructions is available by "[clicking here](#)." The document is not a "true" redline as some cosmetic changes – "co-insurance" to "coinsurance" – are not reflected. However, the redline does aid in identifying substantive changes in the instructions.

### **Direct Links to February 2016 Proposed Materials**

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- [Proposed SBC Blank Template](#)
- [Proposed Uniform Glossary](#)
- [Proposed SBC Sample Completed Template](#)
- [Proposed Why This Matters language for SBC "No" Answers](#)
- [Proposed Why This Matters language for SBC "Yes" Answers](#)
- [Proposed Instructions for Completing the SBC – Group Health Plan Coverage](#)
- [Proposed Guide for Coverage Examples Calculations – Maternity Scenario, Diabetes Scenario, and Foot Fracture](#)
- [Proposed Coverage Examples Narrative – Maternity Scenario](#)
- [Proposed Coverage Examples Narrative – Diabetes Scenario](#)
- [Proposed Coverage Examples Narrative – Foot Fracture](#)

We will report further on the SBC documents when they are finalized.

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