



BENEFIT NEWS BRIEFS

HHS Posts Q&As Concerning the New SBCs Applicability Date

The Department of Health and Human Services (HHS) recently [posted](#) some questions and answers (Q&As) concerning the applicability date of the Summary of Benefits and Coverage (SBC) template and associated documents ("2017 SBC") that were published on April 6, 2016 at the HHS website at <https://www.cms.gov/cciio/Resources/Forms-Reports-and-Other-Resources>, scroll down to Summary of Benefits and Coverage and Uniform Glossary.

The DOL also posted the documents at: <https://www.dol.gov/agencies/ebsa/laws-and-regulations/laws/affordable-care-act/for-employers-and-advisers/summary-of-benefits>. The new SBC and supporting materials are listed under the section that states "for use on or after 04/01/17 (Final)."

The HHS Q&As (summarized below) address when the SBCs must be used and also clarify what value plans should enter when preparing the example in the "Treatment of a Simple Fracture" section. Q&A-3 concerns insurance issuers and is therefore omitted below.

Q-1 - *A group health plan offers plans with an annual open enrollment period. When must it use the 2017 SBC?*

A-1 - Health plans with an annual open enrollment period are required to use the April 2017 edition of the SBC template and associated documents beginning on the first day of any open enrollment period that begins on or after April 1, 2017.

Q-2 - *A group health plan does not maintain an annual open enrollment period. When must it use the 2017 SBC?*

A-2 - For group health plans without an open enrollment period, plans are required to provide the 2017 SBC beginning on the first day of the first plan year that begins on or after April 1, 2017.

Q-4 - *What value should health plans and issuers enter on the Plans and Benefits template for "Treatment of a Simple Fracture"?*

A-4 – Until further notice, to satisfy template validation requirements, issuers should enter default values of "\$0" on the Plans and Benefits template for each field under the third coverage example, "Treatment of a Simple Fracture." In addition, until further notice, health plans and issuers may continue to use the Coverage Example Calculator approved for Plan Year 2016 to calculate data for the SBC scenarios "Having a Baby" and "Managing Diabetes."

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