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Health Care Reform Alert

April 1, 2015

New Summary of Benefits and Coverage Template Delayed

A March 30 Department of Labor (DOL) FAQ announced that the new Summary of Benefits and Coverage (SBC) template and related documents, published in [proposed regulations on December 22, 2014](#), are delayed until 2016. However, some changes to the regulation will apply in 2015, as planned.

The FAQ indicates final regulations are expected in the near future.

Delayed until 2016

Per the FAQ, the new SBC template will go through consumer testing. The DOL anticipates that the document will be finalized in January 2016, and will apply to 2017 coverage. Use will likely begin during fall 2016 open enrollment for plan years beginning on or after January 1, 2017. Expected changes to the template include, but are not limited to:

- An additional cost example for a foot fracture treated in an emergency room
- Updated claims/pricing data for the coverage example calculator
- New minimum essential coverage and minimum value information
- Issuer website for specific policy or group certificate of coverage information
- Uniform glossary revisions
- Removal of annual limits for essential health benefits (EHBs) information

Still required this year

Proposed regulations that are still expected to take effect on September 1, 2015 for plan years beginning on or after January 1, 2016 clarify the following:

- Applicability to health reimbursement accounts (HRAs) and health savings accounts (HSAs), excepted benefits, expatriate coverage and Medicare Advantage plans
- Responsible entities and their role in monitoring for compliance when designating to a 3rd party
- The SBC must be provided at enrollment or re-enrollment

Read the [DOL March 30, 2015 FAQ](#) for further details.

We encourage you to bookmark Cigna's health care reform website, InformedOnReform.com, where we post the most recent guidance and regulatory information.

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