



**\*\*\* IMPORTANT BULLETIN \*\*\***

**TO:** All Group Health Clients  
**FROM:** Greenberg & Associates Insurance, LLC  
**DATE:** May 5, 2015  
**RE:** 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, 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 3<sup>rd</sup> party
- The SBC must be provided at enrollment or re-enrollment

Refer to the following link for more questions.

<http://www.dol.gov/ebsa/faqs/faq-aca24.html>

Please don't hesitate to let us know if you have any questions regarding this update.

Sincerely,  
Sharon Greenberg and Adrienne Hutchins