



November 18, 2011

Summary of Benefits and Coverage (SBC) Rules Delayed

Healthcare reform mandates that group health plans provide the Summary of Benefits and Coverage (SBC) and Uniform Glossary pursuant to rules recently issued by the agencies. The rules as originally issued provided for an applicability date beginning March 23, 2012. Just released [Frequently Asked Questions \(FAQs\)](#) provide for a delay in compliance with these requirements until final regulations are issued and applicable.

This delay is consistent with many comments submitted to the agencies. Over 60 employers and trade associations submitted a [letter](#) to the agencies urging a delay in the applicability date for the SBC final rules and calling for a safe harbor for large employer plans.

Until final regulations are issued and applicable, employers are not required to comply with the SBC requirements. The final rules and templates will differ from the proposed rules and templates, so compliance now would result in additional implementation costs. The agencies will be reviewing the many comments on the proposed regulations and templates and intend to issue, as soon as possible, final regulations that take into account the comments and other stakeholder feedback. It is anticipated that the final regulations, once issued, will include an applicability date that gives group health plans sufficient time to comply.

For more information and background on this new SBC requirement, see the [DOL](#) and [CMS](#) websites. We will continue to issue updates as additional information becomes available on this topic. We encourage you to contact your Conner Strong & Buckelew account representative toll-free at 1-877-861-3220 for assistance. For a complete list of Legislative Updates issued by Conner Strong & Buckelew, visit our online [Resource Center](#).

[Click here to change your email preferences or unsubscribe from all communication.](#)