

Expected SBC Implementation Date

Following their recent issuance of a proposed Summary of Benefits and Coverage template, instructions, and other related documents, the departments released an FAQ addressing the effective date of the new documents. Specifically, the departments expect that the final documents will be effective for open enrollment periods beginning on or after April 1, 2017.

Background

On February 26, the Departments of Labor, Treasury, and Health & Human Services (departments) issued a new proposed Summary of Benefits and Coverage (SBC) template, instructions and other related materials. They did not specify an effective date for this material, however. (See our [March 7, 2016 For Your Information.](#))

Expected Effective Date

On March 11, the departments issued an [FAQ](#) addressing the effective date and indicated that, after the comment period ends on March 28, they intend to “expeditiously” review the comments and finalize the SBC template, instructions and other documents. They anticipate that health plans with an open enrollment period will have to use the new material by the first day of the first open enrollment period beginning on or after April 1, 2017. Plans that do not use an open enrollment period must use the new material by the first day of the first plan year on or after April 1, 2017. For calendar year plans, this means the new material will apply to plan years beginning January 1, 2018.



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