



"Solutions you can understand"

## Summary of Benefits and Coverage Deadline Postponed

---

November 2011

On August 22, 2011, the Departments issued proposed regulations and proposed templates in connection with implementation of the Summary of Benefits and Coverage (SBC) and Uniform Glossary requirements of PHS Act §2715.

An applicability date "beginning March 23, 2012" was proposed. At the same time, the Departments invited comments generally, as well as on a range of discrete issues, including the timing of the application of the SBC requirement.

The Departments received many comments on the proposed regulations and templates and intend to issue, as soon as possible, final regulations that take into account these comments and other stakeholder feedback. Of primary concern among most who commented was the difficulty in complying with the proposed regulations in a timely manner.

**Accordingly, until final regulations are issued and applicable, plans and issuers are not required to comply with PHS Act section 2715.**

It is anticipated that the Departments' final regulations, once issued, will include an applicability date that gives group health plans and health insurance issuers sufficient time to comply.

For additional information, please contact:  
**Todd Allison**  
**800.929.1669**

*This material is intended for informational purposes only and should not be construed as legal advice and is not intended to replace the advice of a qualified attorney, tax advisor or plan provider. This information has been taken from sources which we believe to be reliable, but there is no guarantee as to its accuracy. The information provided herein is intended solely for **EHL** clients. You may not display, reproduce, copy, modify, license, sell or disseminate in any manner any information included in this special bulletin.*