

Highlights of SBC Rules Required by the Affordable Care Act (ACA), for Fully-Insured Groups

<i>Special Advisory: Employers who offer group health benefits should review the Department of Labor website (http://www.dol.gov/ebsa/healthreform/) and take immediate action to be compliant with SBC Form (Affordable Care Act) regulations for plan years beginning on or after September 23, 2012.</i>				
SCENARIO	Employer Responsibilities	Deadlines*	SBC Forms Source	Comment
<p><i>Open Enrollment periods occurring After 9/23/2012</i></p>	<p>Develop and Distribute a Summary of Coverage and Benefits form (for each plan) to all prospective, new, and renewing subscribers.</p>	<p>By the first day of the first open enrollment period, in which a subscriber is eligible to enroll, but at least 30 days before the effective date of the renewal.**</p> <p><i>Exception: If this date falls prior to 9/23/2012, then the requirement applies to the next renewal.</i></p>	<p>Anthem: www.findsbc.com</p> <p>Kaiser: www.kp.org</p> <p>Blue Shield: www.bscadocs.com/sbc (not available yet)</p>	<p>**Caution: If enrollment materials are sent out earlier, then it must be distributed at that time (Rule of Thumb- always include the SBC Forms with enrollment materials)</p> <p>(Note: Even if no O.E. opportunity is provided, SBC must be distributed no later than 30 days prior to first day of new plan year.)</p> <p>Also, don't forget, COBRA participants enjoy the same rights as active employees under these regulations.</p>
<p>When Renewal Decision Cannot Be Made 30 Days Prior To Renewal (i.e. Last Minute decisions)</p>	<p>Distribute a Summary of Coverage and Benefits form (for each plan) to all prospective, new, and renewing subscribers.</p>	<p>Distribute no later than 7 business days following the earlier of when the policy is issued or after written confirmation is provided to the insurer of the purchase decision and plans selected.</p>		
<p>New Hires</p>	<p>See "Open Enrollment"</p>			<p>Include in Enrollment Materials</p>
<p>Special Enrollments (if applicable)</p>	<p>Distribute a Summary of Coverage and Benefits form (for each plan) to all eligible subscribers</p>	<p>Within 90 days of the special enrollment event.</p>		
<p>If information changes from a previously issued SBC Form (applies also if no prior SBC form was issued)</p>	<p>Distribute a Summary of Coverage and Benefits form by the first day of coverage.</p>			
<p>Upon Request</p>	<p>Distribute a Summary of Coverage and Benefits form</p>	<p>Within 7 business days of subscriber's request</p>		<p>*In the context of the final regulations, the term "provided" means sent. Accordingly, the SBC is timely if sent out within 7 business days, even if it is not received until after that period.</p>