



Date: March 11, 2016

Subject: Additional Frequently Asked Questions on the Summary of Benefits and Coverage (SBC) Related to Rate Filing and QHP Certification

The guidance below is being issued contemporaneous with FAQs About Affordable Care Act Implementation (Part 30)¹, which address the timing of the updated SBC template and associated documents and explain that the Departments “intend that health plans and issuers that maintain an annual open enrollment period will be required to use the new SBC template and associated documents beginning on the first day of the first open enrollment period that begins on or after April 1, 2017 with respect to coverage for plan years (or, in the individual market, policy years) beginning on or after that date.”

Q: Which SBC template should issuers include in any filings with state regulators for the 2017 benefit year?

A: Issuers should follow directions from state regulators. Generally, for the individual market, regulators should direct issuers to use the 2012 SBC template, as that is the template that is authorized for use for individual market coverage for the 2017 benefit year which starts on January 1, 2017.

Q: How should FFM issuers complete the Plans and Benefits Template for 2017 plan year certification that is part of the 2017 QHP Application?

A: For fields associated with the “simple fracture” coverage example for the updated SBC template, issuers should enter default values of “\$0” for all cost-sharing fields to satisfy validation requirements for this scenario. For 2017 coverage, fields associated *only with the new SBC template* (currently out for 30-day comment, which ends on March 28, 2016), including this coverage example, will not appear on Plan Compare or Window Shopping on HealthCare.gov. For the coverage examples that appear on the 2012 SBC template, issuers should continue to use the 2012 calculator. CMS will provide additional guidance on the Plan and Benefits template as the need arises.

¹ [[https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/index.html#Affordable Care Act.](https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/index.html#Affordable%20Care%20Act)]