

# Colorado's ACA SBC/COSSBC Filing Instructions for 2026

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**COLORADO**  
Department of  
Regulatory Agencies  
Division of Insurance



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## INTRODUCTION

For the 2026 plan year, these Summary of Benefits and Coverage (SBC) and Colorado Supplement to the Summary of Benefits and Coverage (COSSBC) instructions are included with other filing instructions prepared by the Division, and Connect for Health Colorado (C4HCO), also known as “the exchange,” for ACA health benefit plan filing submissions. Instructions for all ACA filing types (rate, form, MHPAEA, network adequacy, and the binder), may be accessed on the Division website at <https://doi.colorado.gov/insurance-industry/health-insurance-information-for-industry>.

The purpose of this document is to provide carriers with guidance on ACA health benefit plan filing instructions for Summary of Benefits and Coverage (SBC) and Colorado Supplement to the Summary of Benefits and Coverage (COSSBC) documents, and to ensure that these documents for ACA health benefit plans are submitted properly, and efficiently through SERFF, pursuant to § 10-16-107.2, C.R.S., Colorado Insurance Regulations 4-2-20 and 4-2-41, and federal laws and regulations.

All carriers offering or providing ACA health benefit plans coverage shall make available to a producer or person through electronic means or paper copy, an SBC form, and a complete copy of the COSSBC for each policy or contract for a health benefit plan that either covers a Colorado resident or is selected by a Colorado resident or such resident’s employer for which the employee or participant is eligible.

The preparation of SBCs and COSSBCs, review of these documents, and finalization of plan specific documents will be described in these instructions as a **two-part process**:

1. Form Filing - These forms shall be completed according to the requirements of Colorado Insurance Regulation 4-2-20 and filed according to the requirements of Colorado Insurance Regulation 4-2-41 using the timeline below.
2. Binder filing - plan-specific forms will be prepared, reviewed, and filed in the Binder filing prior to transfer to C4HCO. Instructions or requirements that are specific to C4HCO are clearly marked with the C4HCO logo.

Carriers offering stand-alone dental plans (SAPDs) that provide for pediatric dental as an essential health benefit should refer to “Colorado ACA SADP Filing Instructions for Plan Year 2026,” for forms, rates and network adequacy filing instructions, available on the Division website at [ACA Annual Filing Types/Forms/Instructions](#).

## TIMELINE FOR SBCs and COSSBCs

Carriers offering individual and small group health benefit plans, on and off the exchange, with an effective date on or after January 1, 2026, are required to submit “Master level” SBCs and COSSBCs in form filings to the Division no later than May 12, 2025. After Division review, and during the finalization of 2026 plans and rates at a time specified by the Division, variant-specific SBCs and COSSBCs will be submitted in the Binder filings for transfer to C4HCO.

Please follow this link to see the current plan year timeline: [Current Plan Year Timeline](#).

On March 10, 2025, the Centers for Medicare and Medicaid Services (CMS) issued the **2025 Marketplace Integrity and Affordability Proposed Rule**. The Division is monitoring this proposed federal rule and current legislation at the state level and will provide guidance as to possible revisions to form filings as they become available.

All dates are subject to change.

## CONSUMER PROTECTION AND TRANSPARENCY REQUIREMENTS

Under the ACA, health insurance carriers seeking certification of health benefit plans must make accurate and timely disclosures of certain information to the appropriate Exchange (if applicable), the Secretary of HHS, and the state insurance commissioner, and make it available to the public.

## MEANINGFUL ACCESS

Pursuant to 45 CFR § 92.8, paragraphs (a), (b), and (d), ACA health benefit plan carriers must include an addendum with language taglines in the top 15 languages spoken by the limited English proficient (LEP) populations of that state on significant documents. Evidence of Coverage, Certificates, and Summaries of Benefits and Coverage are considered significant documents and must include the taglines addendum.

Educational, marketing, and plan materials must comply with the requirements for meaningful access for individuals with limited English proficiency and for people with disabilities. ACA health benefit plan carriers are required to provide a Summary of Benefits and Coverage (SBC) and uniform glossary to current enrollees as well as to individuals and small employers seeking insurance.

Carriers must meet the following requirements for both SBC forms and COSSBC forms:

1. Include on each English version of the forms, a statement, in Spanish, in a conspicuously-visible font size, and offer to provide, upon request, a fully-translated version of these notices in Spanish, and which clearly indicates how to access the alternate language services provided by the carrier; and
2. Ensure that the SBC form and the COSSBC form are available in Spanish for all plans in Colorado and provide them to the Division upon request.

## SERFF FORM FILING INSTRUCTIONS FOR SBCs AND COSSBCs

The following information for SBC and COSSBC documents must be completed in the SERFF form filing submissions.

Carriers must ensure that the Division-approved co-branded logo, which uses both the Colorado Option logo and the carrier's logo to form a dual logo that is a single image, is on all individual and small group **CO Option Standardized Plan** SBC and COSSBC forms.

## SUMMARY OF BENEFITS AND COVERAGE

An SBC is the CMS-required form as described in 45 C.F.R. § 147.200(a) and Colorado Insurance Regulation 4-2-20. For the SBC form, carriers must use the template found in the U.S. Department of Labor's 2021 edition of the SBC template (follow the address that follows). Carriers must follow, in the exact format, the instructions found in the SBC "Instruction Guide for Individual Health Insurance Coverage" or "Instruction Guide for Group Coverage".

[https://www.cms.gov/marketplace/resources/forms-reports-other#Affordable\\_Care\\_Act](https://www.cms.gov/marketplace/resources/forms-reports-other#Affordable_Care_Act)

SBCs submitted in the Form Filing for the 2026 plan year should be submitted at the “master” level with full variability, as specified in Colorado Insurance Regulation 4-2-41. A separate “master” level SBC must be submitted for **Colorado Option Standardized Plans**. SBCs should be prepared at the product level, or for different major variations such as **Colorado Option Standardized Plan**, HSA-eligible, specific metal levels, or on- or off-exchange.

### **Formatting:**

The **2020** federal guidance and 2021 SBC templates shall be used for SBC documents. The Division recognizes that bracketed master-level SBCs filed in the form filing will not meet the page limit requirements specified in federal guidance and state regulation.

Form language and formatting must be precisely reproduced according to the CMS instructions unless instructions allow or instruct otherwise. All sections must be placed in the order and format defined in the instructions. This is especially important for “Why This Matters” and “Limitations and Exceptions” columns.

SBCs specific to the **Colorado Option Standardized Plans** must include any requirements specified in Colorado Insurance Regulation 4-2-81. If visit limits are specified for prenatal and/or postnatal visits, that number shall be combined and specified in the **Limitations, Exceptions, & Other Important Information** column in the **If you are pregnant** row for the applicable **Common Medical Event**. In the **If you need mental health, behavioral health, or substance abuse, Outpatient** row, if some outpatient services have “No Charge”, place the information in the **In-Network Provider** field. For example: “Office Visit \$0/visit, deductible does not apply, Other Outpatient 30% coinsurance”.

Carriers must ensure that the Division-approved co-branded logo is on all master-level individual and small group **CO Option Standardized Plan** SBC forms.

SBCs are subject to the Meaningful Access requirements listed above. The addendum with language taglines in the top 15 languages spoken by the LEP populations of Colorado must be attached to the SBCs.

### **Variable Language:**

- For SBCs submitted through the form filing, carriers must use variable language. A Statement of Variability **MUST** accompany any bracketed or variable language. For the purposes of form certification, the Division does not consider the Statement of Variability to be a policy form, per se, but it is still a required filing element and **MUST** be submitted on the Supporting Documentation tab as part of the form filing. Cost-sharing arrangements - including copayment, coinsurance, deductible, and maximum out-of-pocket amounts - should be bracketed, and the variable options presented should include the entire possible range of minimum and maximum amounts for all variations (as defined in Colorado Insurance Regulations 4-2-42 and 4-2-81).
- Bracketed language must be complete, and the variable options must be identified in the Statement of Variability.

**Carriers submitting revised SBC documents must submit a red-lined version showing all changes that were made. In the initial submission, the redlines must show the changes made from the approved 2025 plan year documents. Redline documents showing changes made in response to objections must be submitted with objection responses. Redlined copies are submitted under the Supporting Documentation tab.**

## COLORADO SUPPLEMENT TO THE SBC

A COSSBC is the Colorado form established and described in Colorado Insurance Regulation 4-2-20. For the COSSBC form, the carrier must use the exact format found in Appendix A of Regulation 4-2-20. Carriers must follow the instructions for completing the COSSBC form found in Appendix B of the regulation. All boxes must be filled in. Carriers may only modify box dimensions, reduce margins, or use a portrait rather than a landscape page layout format. A carrier may also add its logo and form number to the form and print the form in color or black and white. Pursuant to § 10-3-1104(1)(a)(I), C.R.S., in completing the form, carriers shall not misrepresent the benefits, advantages, conditions, or terms of the policy.

Master-level COSSBC documents must be submitted under the Form Schedule Tab in the Form Filing in SERFF. Separate “master” level COSSBCs must be submitted for **Colorado Option Standardized Plans**. Master-level COSSBCs may have bracketed language, with statements of variability, as specified in Colorado Insurance Regulation 4-2-41.

### **Formatting:**

The COSSBC template and instruction provided in Regulation 4-2-20 shall be used for COSSBC documents. The Division recognizes that bracketed master-level COSSBCs filed in the form filing may not meet the page limit requirements specified in state regulation.

### **Variable Language:**

- For COSSBCs submitted through the form filing, carriers may use variable language. A Statement of Variability **MUST** accompany any bracketed or variable language. For the purposes of form certification, the Division does not consider the Statement of Variability to be a policy form, per se, but it is still a required filing element and **MUST** be submitted on the Supporting Documentation tab as part of the form filing. Variable options presented should include the entire possible range of all variations.
- Bracketed language must be complete, and the variable options must be identified in the Statement of Variability.
- Carriers must ensure that the Division-approved co-branded logo is on all master-level individual and small group **CO Option Standardized Plan** COSSBC forms.

## SERFF BINDER FILING INSTRUCTIONS FOR SBCs AND COSSBCs

At a time specified by the Division, after Division review, and during the finalization of 2026 plans and rates, variant-specific SBCs and COSSBCs will be submitted in the Binder filings for transfer to C4HCO. SBC and COSSBC documents for all plans offered through C4HCO, must be attached under the Supporting Documentation tab of the binder.



Please remember, the following elements apply to all filings:

## SUMMARY OF BENEFITS AND COVERAGE

Carriers offering plans through C4HCO must submit SBC forms in the SERFF binder, at a date after form filing reviews are completed, specified by the Division, for every plan being offered. For the 2026 plan year, this will include every cost-sharing plan variation of every on-exchange individual plan, and every individual and small group Colorado Option Standardized Plan and cost-sharing variation, both on-exchange and off-exchange. This means, for the binder, each plan variant (i.e., -00, 01, -02, -03, ... -07, etc.) must have its own unique SBC form with specific cost-sharing amounts. Bracketed language cannot appear on any SBC. Detailed instructions regarding the specific plans and plan naming are provided in the Binder instructions.

For Plan Year 2026, please utilize zipped files to upload SBCs on the Supporting Documentation tab under the appropriate user-added heading for the English and Spanish translated plan level SBCs.

The SBCs submitted in the Binders will be specifically reviewed for plan names, page length and compliance with SBC instructions and rules. **SBCs may not exceed four (4) double-sided pages.** The SBCs will be reviewed using the Plans and Benefits Template (PBT) to ensure that each item listed in the “What You Will Pay” column is correct for each variant-level SBC. ***Limitations, Exceptions, & Other Important Information*** columns will also be reviewed, including SBCs for **CO Option Standardized Plans** and compliance with benefits listed in Regulation 4-2-81 and the inclusion of the Division-approved co-branded logo. If the benefits do not match, objections will be sent to correct the PBT or the SBC.

All SBCs will be required in English and Spanish for all on-exchange individual plans, and for all individual and small group **Colorado Option Standardized Plans**, both on-exchange and off-exchange. Carriers may submit both English and Spanish SBCs to the Binder at the same time or provide only the English SBCs in the first submittal. The Spanish SBCs can be submitted after Division review or upon request. If revisions are required to SBCs due to objections, both English and Spanish SBCs will require revision if both were provided in the first submittal.

**For Colorado Option Standardized Plans, in the individual market, SBCs must be provided in English and Spanish for every variant level of every plan for both on-exchange and off-exchange, including the -00 and -07 variant. For Colorado Option Standardized Plans, small group market carriers shall provide English and Spanish versions for every variant level of each Colorado Option Standardized Plan.**

The addendum with language taglines in the top 15 languages spoken by the LEP populations of Colorado must be attached to the SBCs.

Dental carriers should use the current standard template developed by C4HCO. SBCs will be submitted directly to C4HCO by the date specified by C4HCO.

## COLORADO SUPPLEMENT TO THE SBC

Carriers offering plans through C4HCO must submit COSSBC forms for every plan being offered, in the binder in SERFF at a date after form filing reviews are completed, specified by the Division. For the 2026 plan year, this will include every on-exchange individual plan, and every individual and small group Colorado Option Standardized Plan, both on-exchange and off-exchange, in English and Spanish. COSSBCs can be prepared at the variant level, or at the plan level if there are no differences

between the variants. **For Colorado Option Standardized Plans, COSSBCs must be provided in English and Spanish for every plan, individual and small group, both on-exchange and off-exchange.** Detailed instructions regarding the specific plans and plan naming are provided in the Binder instructions.

For Plan Year 2026, please utilize zipped files to upload COSSBCs on the Supporting Documentation tab under the appropriate user-added heading for the English and Spanish translated plan level COSSBCs.

All COSSBCs will be required in English and Spanish for all on-exchange **individual** plans, and for all individual and small group **Colorado Option Standardized Plans**, both on-exchange and off-exchange. Carriers may submit both English and Spanish COSSBCs to the Binder at the same time or provide only the English COSSBCs in the first submittal. The Spanish COSSBCs can be submitted after Division review or upon request. If revisions are required to COSSBCs due to objections, both English and Spanish COSSBCs will require revision if both were provided in the first submittal.

**For Colorado Option Standardized Plans, in the individual market, COSSBCs must be provided in English and Spanish for every variant level, by plan or variant, for both on-exchange and off-exchange, including the -00 and -07 variant, or at the plan level if there are no differences between the variants. For Colorado Option Standardized Plans, small group market carriers shall provide English and Spanish versions for every variant level, by plan or variant, of each Colorado Standardized Plan. All COSSBCs for Colorado Option Standardized Plans must include the Division-approved co-branded logo.**

The COSSBC form is not required for Dental filings.