

## DISCLAIMER

This document has been prepared by Trinity HR Consulting, Inc. ("Trinity") solely for use as a general source of information. As such, it is <u>not</u> intended to take the place of advice from legal and/or tax counsel. Trinity strongly urges seeking legal and/or tax counsel on this subject matter prior to taking any related actions or making any related decisions.

## **COMPARISON OF HEALTH CARE ACCOUNTS**

|                                | Health Savings Account (HSA)  | Health Reimbursement<br>Arrangement (HRA)   | Health Flexible Spending Account (FSA)  | Dependent Care Assistance Program (DCAP)                                       | Limited Purpose Flexible Spending Account (LPFSA)  |
|--------------------------------|---|---|---|--|--|
| Account ownership              | Employee/ Individual  | Employer (held in employee's name)  | Employer (held in employee's name)  | Employer (held in employee's name)   | Employer (held in employee's name)   |
| Deposits made by               | Employer, employee or both  | Employer  | Employer, employee or both  | Employer, employee or both   | Employer, employee or both   |
| Separate account               | Required; IRA-type account  | Not required; paid from employer assets   | Not required; paid from employer assets   | Not required; paid from employer assets  | Not required; paid from employer assets  |
| Expenses covered               | Medical, dental, vision, prescription & over-the-counter expenses. COBRA, retiree medical insurance premiums, LTC premiums or expenses Reference: IRC § 213(d)  | Medical, dental, vision, prescription & over-the-counter expenses. Post-tax insurance premiums  Reference: IRC § 213(d) | Medical, dental, vision, prescription & over-the-counter expenses Reference: IRC § 213(d) | Caregiver costs for dependent care expenses while at work Reference: IRC § 129 | Typically limited to qualifying dental and vision expenses only; can also cover post-deductible medical and prescription expenses  Reference: IRC § 213(d) |
| Accompanying plan requirements | Must be covered by qualified HDHP and not covered by any plan that covers medical expenses under the deductible HDHP Minimum Deductible 2019: \$1,350 single; \$2,700 family HDHP Minimum Deductible 2020: \$1,350 single; \$2,700 family | Generally, must be integrated with group medical plan meeting health care reform requirements                           | None  | None   | None, though usually paired with HSA and qualified HDHP  |

|   | Health Savings Account (HSA)   | Health Reimbursement<br>Arrangement (HRA)   | Health Flexible Spending Account (FSA)  | Dependent Care<br>Assistance Program<br>(DCAP)  | Limited Purpose<br>Flexible Spending<br>Account (LPFSA)   |
|---|--|---|---|---|---|
| Contribution limits                       | Calendar year limits:  | None  | \$2,750 per plan year with potential for annual inflation increases. The limit is per person. Employers may elect a lower contribution limit. | \$5,000 per calendar year if single<br>or married filing jointly, \$2,500 if<br>married filing separately | \$2,700 per plan year with potential for annual inflation increases. The limit is per person. Employers may elect a lower contribution limit. |
| Portability                               | Full portability required  | Portability allowed at employer's discretion  | None  | None  | None  |
| Rollover                                  | Full rollover required   | Rollover allowed at employer's discretion   | \$500 rollover allowed at employer's discretion   | None  | \$500 rollover allowed at employer's discretion   |
| Funds availability                        | As deposits are credited   | As deposits are credited; may be credited in a lump sum   | Full annual election available on first day of coverage (uniform coverage)  | As deposits are credited  | Full annual election available on first day of coverage (uniform coverage)  |
| Claim adjudication                        | Not allowed; though participants must retain receipts  | Required  | Required  | Required  | Required  |
| Compatibility with other savings accounts | May be paired with HRA, FSA if they are limited to amounts over deductible, or to dental/ vision only; may be paired with DCAP, PRA      | May be paired with FSA, DCAP, PRA. If paired with an HSA, must be limited to amounts over the deductible or to dental/vision only                 | May be paired with HRA, DCAP, PRA. If paired with an HSA, must be limited to amounts over the deductible or to dental/vision only             | May be paired with HSA, HRA,<br>FSA, PRA  | May be paired with HSA to stay compliant with IRS regulations. Limited to amounts over the deductible and/or to dental/vision only.           |
| Employer contributions                    | Can be made on behalf of current employees (account extends to spouse and dependents)  | Can be made on behalf of current<br>and former employees, their<br>spouses and dependents, and<br>spouses and dependents of<br>deceased employees | Can be made on behalf of current employees (account extends to spouse and dependents)   | Can be made on behalf of current employees (account extends to spouse and dependents)                     | Can be made on behalf of current employees (account extends to spouse and dependents)   |
| ERISA plan                                | Generally no   | Yes   | Yes   | No  | Yes   |
| COBRA                                     | Does not apply   | Applies   | Applies   | Does not apply  | Applies   |
| Retirees                                  | Can be covered   | Can be covered  | Cannot be covered   | Cannot be covered   | Cannot be covered   |
| Debit card usage                          | Yes  | Yes   | Yes   | No  | Yes   |
| Contributions for Medicare participants   | Contributions cannot be made once an individual has Medicare coverage.   | No limits on contributions  | No limits on contributions  | No limits on contributions  | No limits on contributions  |
| Usage for ineligible expenses             | Allowed. Amounts included in income; and subject to 20% penalty unless after account beneficiary's death, disability or attaining age 65 | Not allowed   | Not allowed   | Not allowed   | Not allowed   |

|  | Health Savings Account (HSA)   | Health Reimbursement<br>Arrangement (HRA)                    | Health Flexible Spending Account (FSA) | Assistance Program  | Limited Purpose<br>Flexible Spending<br>Account (LPFSA) |
|--|--|--|--|---|---|
| Distributions for expenses incurred after individual is no longer eligible | Can be made  | Can be made at employer's discretion, or if COBRA is elected | Can be made if COBRA is elected        | Can be made for remainder of plan year at employer's discretion | Can be made if COBRA is elected                         |
| Coverage for sole proprietors, partners and 2% or more S-corp owners       | Yes, but not eligible to participate in pre-tax cafeteria plan used to fund HSA in the workplace | Cannot be covered  | Cannot be covered                      | Cannot be covered   | Cannot be covered                                       |