hpi

TO: Our Valued Clients and Brokers

FROM: Health Plans, Inc.

DATE: March 28, 2022

RE: Temporary Waiver to Deductible for Telehealth Service for HSA-QHDHP

Health Plans, Inc. (HPI) is issuing this Compliance *eBlast* to notify you of recent federal guidance allowing employers to temporarily waive the deductible for telehealth services for Health Savings Account - Qualified High Deductible Health Plans (HSA-QHDHP). With the signing of the Consolidated Appropriations Act, 2022 (CAA 2022) on March 15, 2022, employers with an HSA-QHDHP may choose to waive the deductible for any telehealth service from April 1, 2022 through December 31, 2022 without causing participants to lose HSA eligibility. This is optional; HSA-QHDHPs are not required to waive the deductible that would otherwise apply to non-preventive telehealth services.

Of Note:

- The federal Coronavirus Aid, Relief, and Economic Stimulus (CARES) Act from March 2020 allowed HSA-QHDHPs to provide coverage for all telehealth services before plans deductibles were met without losing status as HSA-QHDHP for Plan Years that began on or before December 31, 2021. Effective January 1, 2022, clients who previously waived deductibles for telehealth services under a HSA-QHDHP were required to reapply the deductibles for telehealth services.
- Now under the CAA 2022, clients can again choose to waive the deductibles under their HSA-QHDHP but for a limited period of time from April 1, 2022 through December 31, 2022. This waiver does not apply for the first three months of 2022.
- For clients that use Doctor On Demand for telehealth services, the deductible can only be waived for non-Doctor On Demand services.

If you would like to temporarily waive the deductible for telehealth services for your HSA-QHDHP, please contact your HPI Account Manager to request an amendment to your plan(s) which will be effective April 1, 2022 through December 31, 2022.

Please do not reply to this email. Please contact the HPI Account Service Team directly if you have questions or would like to temporarily waive the deductible for telehealth services for your HSA-QHDHP.

Regards,

Andrew H. A. Meggison Director, Regulatory Affairs

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The information contained in this message is intended to provide a summary of our current understanding of recent regulatory developments which may affect group benefit plans. It should not be construed as specific legal advice or legal opinion. The contents are for general informational purposes only and are not a substitute for the advice of legal counsel.