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High Deductible Health Plans: First-Dollar Coverage of Telehealth Is Back

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The <u>Consolidated Appropriations Act</u>, 2023 (CAA 2023) holds some welcome news for employers that offer a high deductible health plan (HDHP) option paired with a health savings account (HSA). Thanks to the CAA 2023, these employers can continue to offer first-dollar telehealth benefits without affecting their employees' eligibility to receive HSA contributions.

The CAA 2023 resurrects and extends a piece of relief originally granted in 2020 by the <u>Coronavirus Aid, Relief, and Economic Security (CARES) Act</u>. The CARES Act first allowed an HDHP to cover general telehealth services without cost sharing, prior to the deductible, without affecting an employee's eligibility to make or receive HSA contributions. That provision expired on December 31, 2021, but it was brought back to life by the Consolidated Appropriations Act, 2021, for a partial year—effective April 1, 2022, and set to expire on December 31, 2022.

With the CAA 2023, the U.S. Congress has breathed new life into HDHP/telehealth relief, which now applies to plan years beginning on or before January 1, 2025. For employers with calendar year plan years, this means that telehealth services can be covered by an HDHP, without cost sharing and prior to the deductible, for the entirety of the 2023 and 2024 plan years.

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