

# CARES Act Update

## (Coronavirus Aid, Relief, and Economic Security Act)

The recent relief bill signed into law this past week includes provisions that expand the list of eligible expenses for Health Savings Account (HSA), Flexible Spending Account (FSA) and Health Reimbursement Arrangement (HRA) benefits while also providing the temporary inclusion of Telemedicine as an allowable first dollar expense for HSA plans. Below is a list of these changes in more detail.

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### Over the Counter (OTC) Medications – Now are an Eligible Expense

*OTC expenses are retroactive back to January 1, 2020*

- With the new provisions signed by the President in March of 2020, **PRESCRIPTIONS ARE NO LONGER NEEDED to purchase OTC medications with HSA or FSA funds (as well as HRA's that allow medication purchases).**
- Previously a PRESCRIPTION was required for Over the Counter medications purchased with HSA or FSA funds *(as well as HRA's that allow medication purchases).*

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### Menstrual Care Products (MCP) – Now are an Eligible Expense

*These expenses are retroactive back to January 1, 2020*

- Menstrual Care Products have now been APPROVED under the CARES Act to be an eligible medical care expense. **HSA and FSA participants (also qualifying HRA participants) can now utilize their funds to purchase MCPs.**
- Previously MCPs (including tampons, pads, liners, cups, sponges, or similar products for menstruation) were not considered eligible expenses for HSA, FSA or HRA.

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### Telemedicine and HSAs

*Effective for plan years beginning on or before December 31, 2021*

- **Telemedicine services can now be covered before the plan deductible has been satisfied, and it will not disqualify a participant's eligibility to make contributions to an HSA.**
- This provision for Telemedicine is only temporary and is limited to plan years beginning on or before December 31, 2021.
- Previously HSA rules had historically prohibited High Deductible Health Plans (HDHPs) from providing any type of coverage prior to the deductible being satisfied for things other than preventative care.

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### Automatic Debit Card Transactions for OTC and MCP

- **The NueSynergy Debit Card may not immediately work for many of these purchases.** We expect merchants to start adopting changes for OTC items around April 15, 2020 and Menstrual Care Products around May 15, 2020.
- You can use another form of payment and submit a claim (with an itemized receipt) for reimbursement from now until the debit card is able to be used for these OTC and MCP purchases.
- The OTC and MCP CARES ACT provision is retroactive back to January 1, 2020. With a valid itemized receipt, claims for OTC and MCP can be submitted for reimbursement retroactive back to January 1, 2020.