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COVID-19: Telemedicine & HSAs

Insight — 04/01/2020

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Last updated 4.1.2020

What's the Problem: To alleviate the risk that people would be exposed to COVID-19 during unrelated medical visits to medical facilities, some telemedicine providers are encouraging employers to offer telemedicine at no copay or deductible for any medical condition during the pandemic. But that is broader than Notice 2020-15 would allow. Does providing telemedicine with no cost sharing cause any problem?

Answer: The CARES Act addresses this issue by temporarily amending the Tax Code to permit group health plans to provide any service with zero cost sharing through telemedicine (including services completely unrelated to COVID-19) without jeopardizing participant HSA eligibility. This special exception to the general HSA rules will remain in effect until the first plan year starting in 2022.