HEALTH & WELFARE PLAN LUNCH GROUP

September 5, 2019

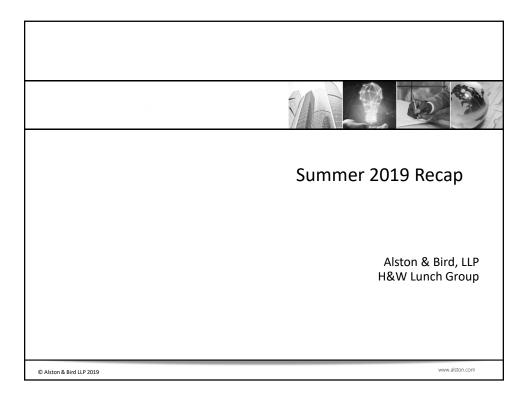
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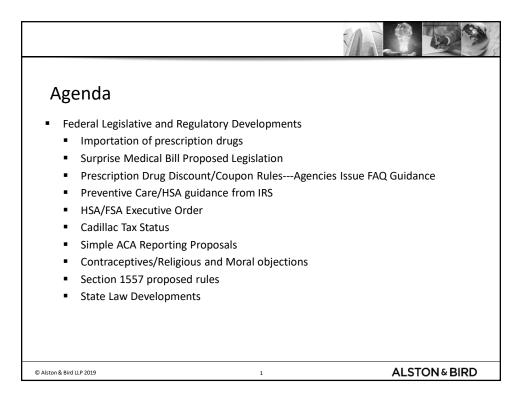
One Atlantic Center 1201 W. Peachtree Street Atlanta, GA 30309-3424 (404) 881-7885 E-mail: john.hickman@alston.com

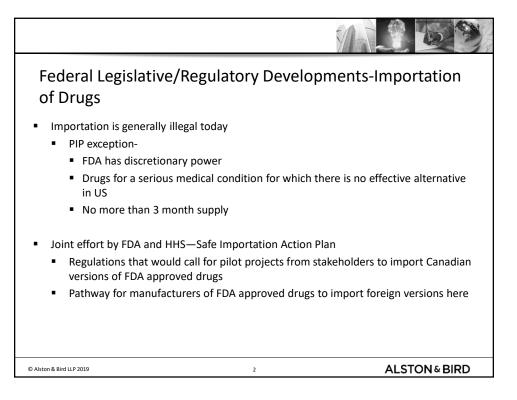
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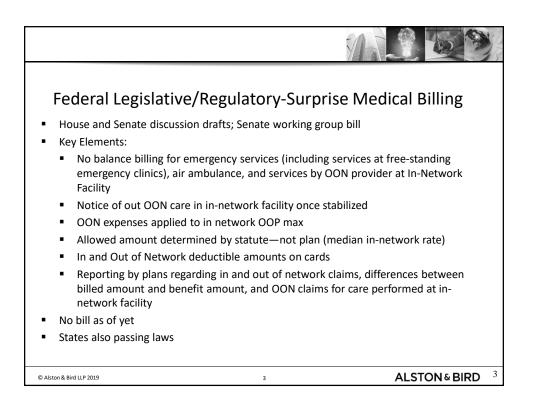
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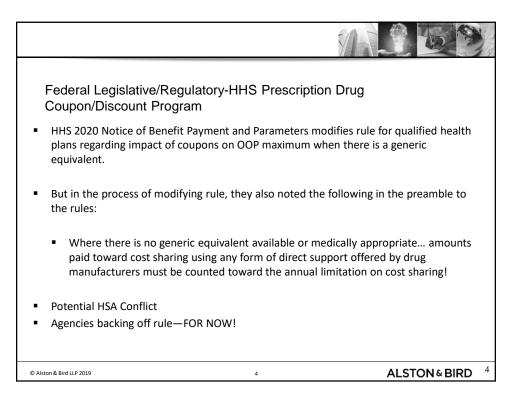
1. Summer 2019 Recap



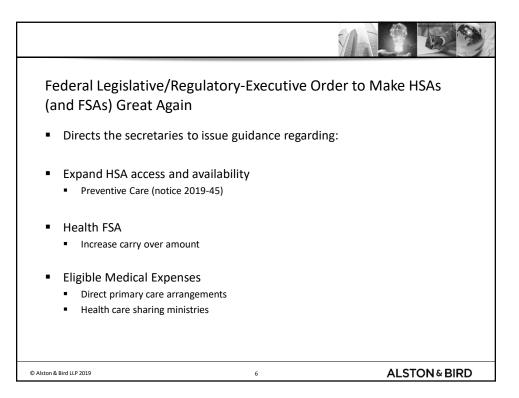


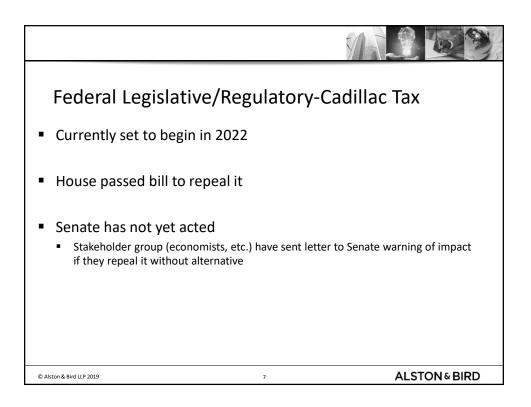


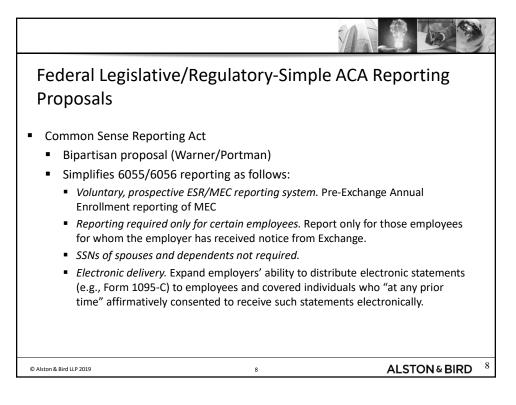




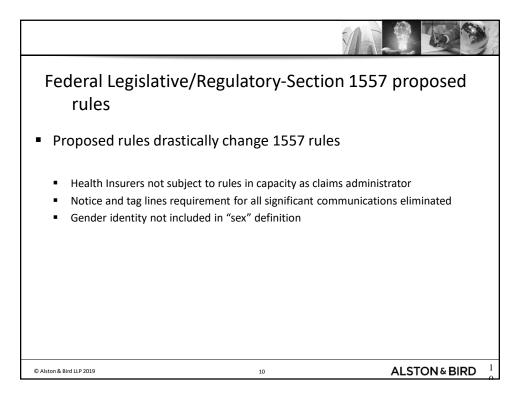
Federal Legislative/Regulatory-IRS Preventive Care/HSA guidanceIRS issued Notice 2019-45
 Identifies certain services/drugs for chronic conditions that will be treated as preventive care.
 Notice provides an exhaustive list Not consistent with industry standard (especially diabetes related services)
 Guidance to date is exhaustive
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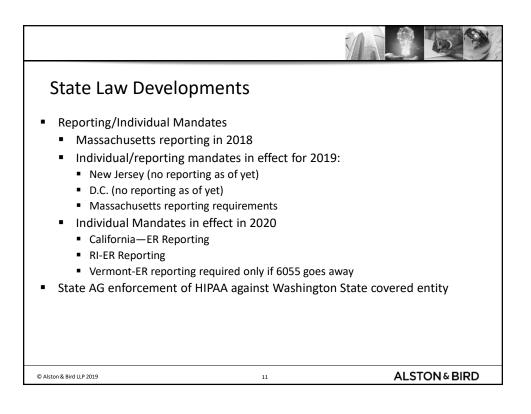


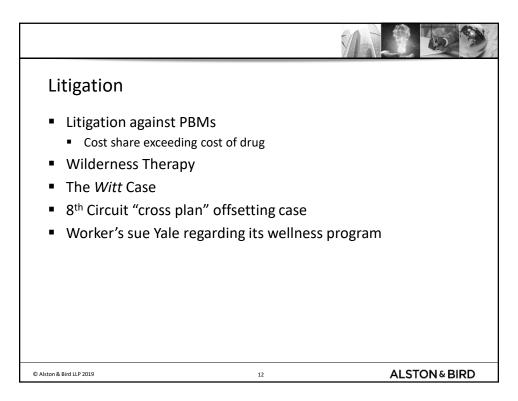


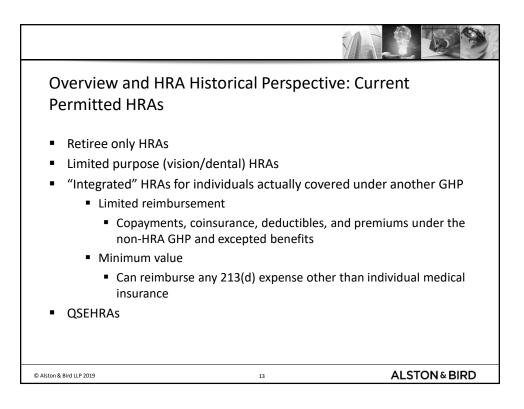


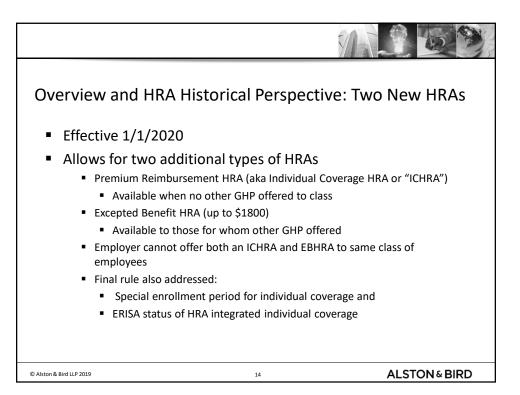


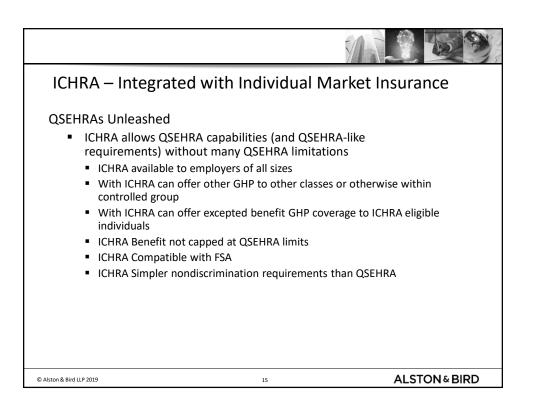


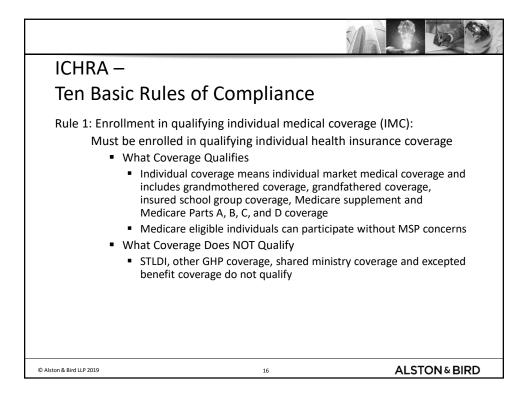


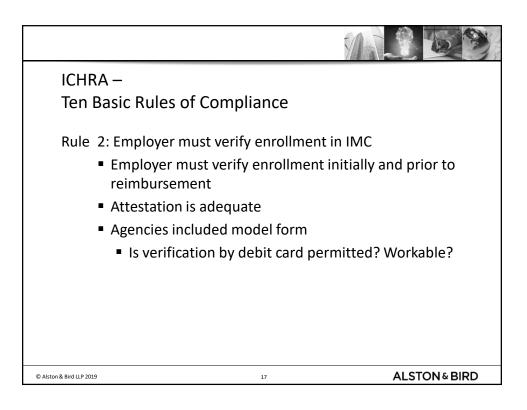


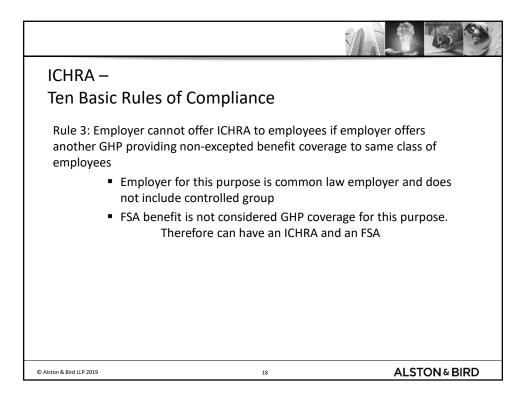


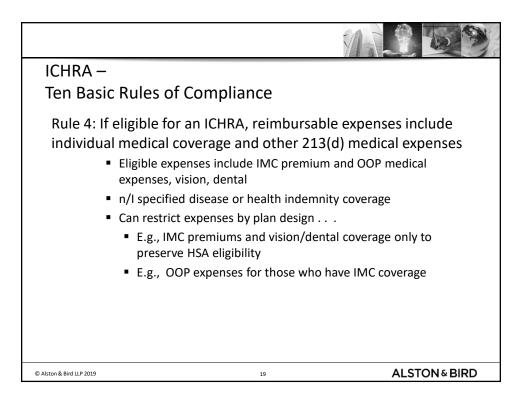


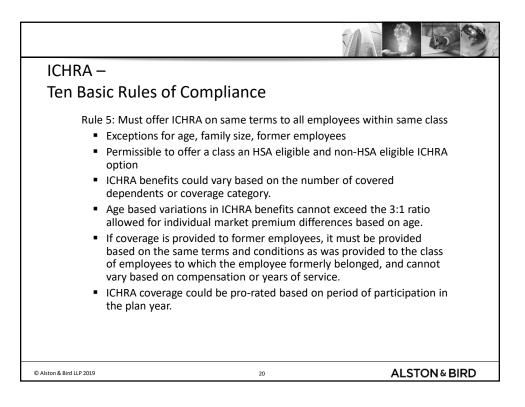


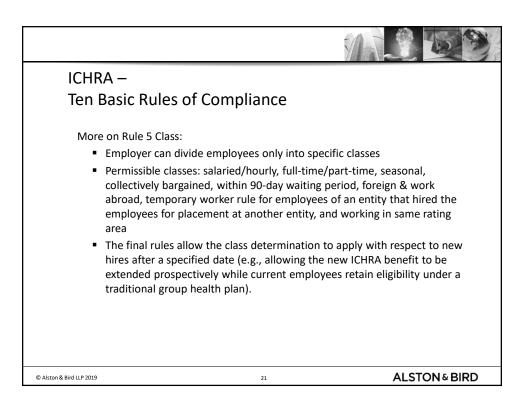


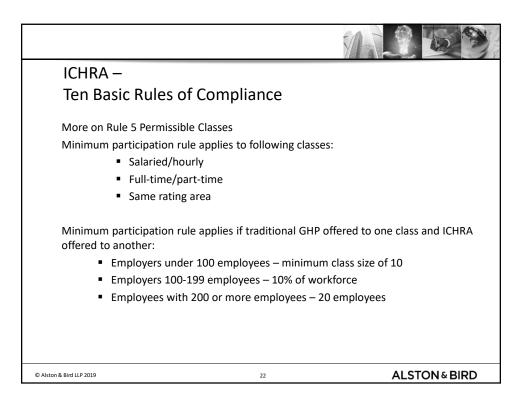


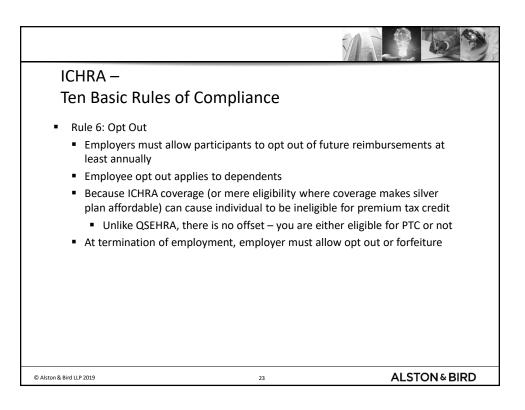


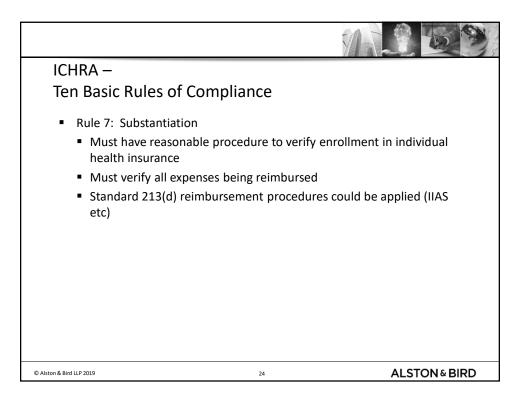


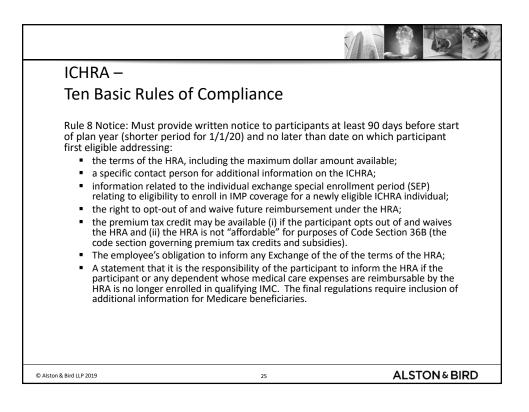


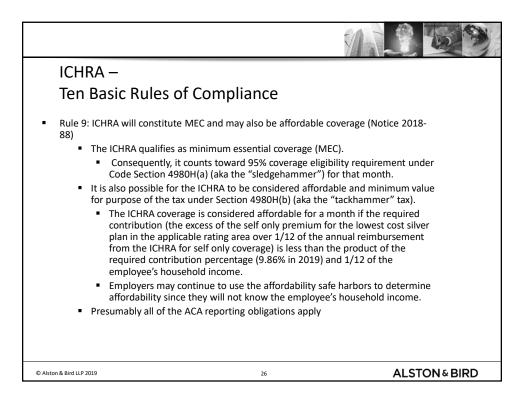


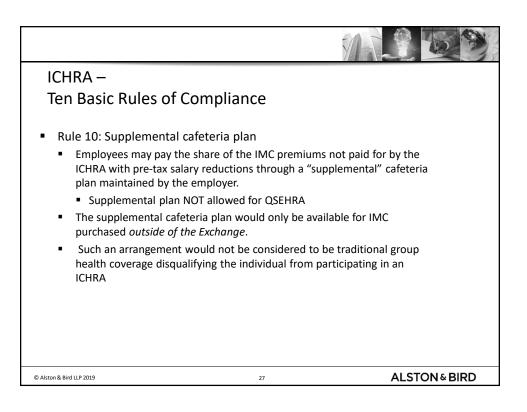


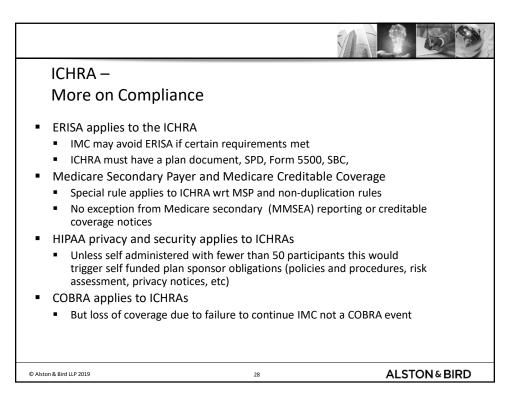


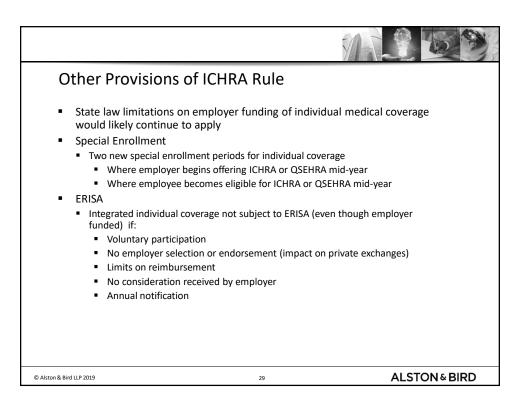


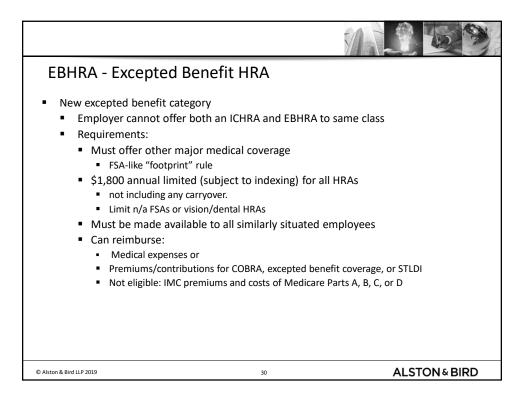


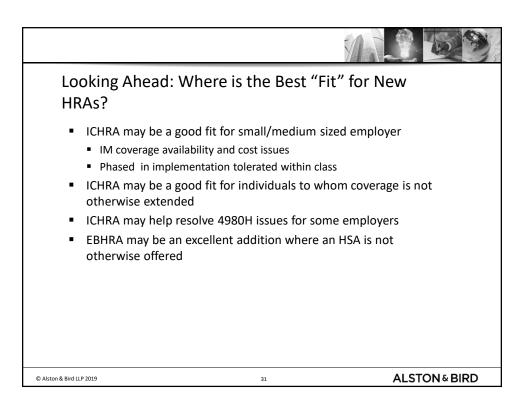














Looking Ahead: Planning for 2020					
Combination table	ICHRA (requires purchase of individual major medical coverage)	EBHRA (requires eligibility (but not enrollment) for employer sponsored major medical coverage)	Health FSA (requires eligibility (but not enrollment) for employer sponsored group coverage including ICHRA)	HSA	
General Purpose FSA	Compatible	Compatible		Not Compatible	
Limited scope vision/dental FSA or HRA	Compatible	Compatible		Compatible	
ICHRA		Not compatible	Compatible	Can be structured to be HSA compatible by limiting ICHRA to coverage	
EBHRA	Not compatible		Compatible	Can be structured to be HSA compatible by limiting EBHRA to vision/dental coverage	
Health fixed indemnity (e.g., cancer, HIP, CI)	Compatible, but ICHRA cannot fund health indemnity policy	Compatible, but EBHRA cannot fund health indemnity policy	Compatible but FSA cannot fund health indemnity policy	Compatible with specified disease, HIP, or vision/dental only coverage	
Vision/dental expense incurred coverage	Compatible, and ICHRA can fund vision/dental expense incurred policy	Compatible, and EBHRA can fund vision/dental expense incurred policy	Compatible but FSA cannot fund policy	Compatible, but HSA can NOT fund policy	
Accident and disability coverage	Compatible, cannot be funded by ICHRA	Compatible, cannot be funded by EBHRA	Compatible but FSA cannot fund policy	Compatible but HSA can NOT fund policy	

