

TO: Our Valued Clients and Brokers

FROM: Health Plans, Inc. DATE: August 5, 2025

RE: Compliance eBlast: Important Benefit Provisions of the "One Big Beautiful Bill" Act

Health Plans, Inc. (HPI) is issuing this Compliance *eBlast* to notify you of key and specific requirements resulting from the signed One Big Beautiful Bill Act. The recently enacted One Big Beautiful Bill Act (OBBBA) introduces permanent changes to health and welfare benefit plans. Below are key updates for medical employer-sponsored plans administered by HPI:

Permanent Extension of Telehealth and Remote Care Service Relief

Effective Date: January 1, 2025 (retroactive)

- High-Deductible Health Plans (HDHPs) can permanently cover telehealth and remote care services before the deductible is met.
- This is a plan option, it is not mandatory.
- This change has no impact on HSA eligibility, maintaining tax advantages for participants.

Note: While the regulatory update is effective January 1, 2025, HPI will be implementing client requests to amend telehealth services prospectively on their upcoming plan year renewal, beginning with ERISA Plan Years effective on or after October 1, 2025.

<u>Direct Primary Care Arrangements</u> Effective Date: January 1, 2026

The OBBBA permits HSA-eligible individuals enrolled in Direct Primary Care Service Arrangements (DPCSAs) to make or receive HSA contributions and allows individuals to use HSA funds to pay for certain DPCSA services. For this purpose, a DPCSA is an arrangement which:

- Provides medical care consisting solely of "primary care services" provided by primary care practitioners.
- The sole compensation for such care is a fixed periodic fee.
- With respect to any individual for any month, the aggregate DPCSA fixed fees are capped at \$150 per month, or twice that for DPCSA's covering more than one individual.

For this purpose, "primary care services" do not include:

- Procedures that require the use of general anesthesia.
- Prescription drugs other than vaccines.
- Laboratory services not typically administered in an ambulatory primary care setting.

The OBBBA also clarifies that DPCSA fees are treated as medical expenses.

Dependent Care Reimbursement Accounts

Effective Date: January 1, 2026

Increase the exclusion from \$5,000 (\$2,500 if the employee is married and files a separate tax return) to \$7,500 (\$3,750 if the employee is married and files a separate tax return).

Proposals Not Included In Final Legislation

- HSA eligibility for Medicare enrollees.
- HSA tax-free reimbursement of up to \$500/year for gym memberships.

Specifics on the impact on plan designs for the plan's next renewal will be listed in HPI's annual Plan Change eBlast issued in the coming months.

Please contact your HPI Account Service Team directly if you have any questions.

Regards,

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The information contained in this message is based on 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.