



June 8, 2018

The Honorable Peter Roskam
Chairman
House Ways and Means
Health Subcommittee
Rayburn HOB Room 2246
Washington, DC 20515-1306

The Honorable Sandy Levin
Ranking Member
House Ways and Means
Health Subcommittee
Longworth HOB Room 1236
Washington, DC 20515-2209

The Honorable Erik Paulsen
Chairman
Joint Economic Committee
Cannon HOB Room 127
Washington, DC 20515-2303

The Honorable Carolyn Maloney
Ranking Member
Joint Economic Committee
Rayburn HOB Room 2308
Washington, DC 20515-3212

Dear Chairmen Roskam and Paulsen and Ranking Members Levin and Maloney:

The National Business Group on Health (Business Group) writes in strong support of legislation ([H.R. 5138, the Bipartisan HSA Improvement Act](#)) that would make many important health savings account (HSA) improvements and increase their value to employees and their families. We applaud Congress for holding hearings on Lowering Costs and Expanding Access to Health Care through Consumer-Directed Health Plans and The Potential for Health Care Savings Accounts to Engage Patients and Bend the Health Care Cost Curve. Passage of this legislation will improve coverage for the 22 million Americans who have coverage through HSA plans.

The National Business Group on Health represents approximately 421, primarily large, employers (including 75 of the Fortune 100) who voluntarily provide generous health benefits and other health programs to over 55 million American employees, retirees, and their families.

Our members strongly support health savings accounts and HSA-qualified plans, which encourage employees and their families to be prudent health care consumers and also help them save for future health care expenses. According to our most recent [NBGH Health Plan Design Survey](#), in 2018 90% of large employers who responded to our survey offer a consumer-directed or HSA-qualified health plan and it is the only type of plan offered at 39% of them. It is also the most popular plan chosen by employees.

Congress created HSAs as part of the Medicare Modernization Act of 2003. Some positive and negative policy changes have been made to the accounts since 2003, but for the most part, government action has not kept pace with rapid innovation in employee benefits and in the health care marketplace. We urge Congress to act now to pass this legislation that will improve HSA coverage.

Specifically, we support the following improvements to HSAs and CDHP plans contained within H.R. 5138:

- Allowing plans to cover primary, preventive, and chronic care management services in employee or retail clinic before the deductible;
- Permitting plans to cover medications and services to manage chronic conditions before the deductible;
- Clarifying that plans can cover use of telehealth, second opinion, and similar services before the deductible;
- Incentivizing wellness activities by allowing employees and other plan participants to use HSA dollars for exercise, fitness, and others up to a specific dollar limit;
- Permitting HSA contributions even if a spouse has a health FSA;
- Clarifying that eligible dependents for purposes of the HSA includes children up to age 26; and
- Allowing the conversion of health FSAs or HRAs to HSAs, and providing increased flexibility for converting disqualifying health FSA or HRA benefits to HSA-permitted benefits.

While we also support other [HSA improvements](#), we believe that the provisions in this bill, which have bipartisan support, will significantly help Americans with HSA coverage have greater access to medications and services for chronic care and other care at lower cost among other benefits. Allowing people to use their HSA dollars for wellness activities could boost employee take up thus incentivizing healthier behavior. Finally, these changes will help make it easier for employers to administer health benefits for employees with HSA coverage.

The National Business Group on Health appreciates your efforts to improve health savings accounts. We urge you to pass comprehensive bipartisan legislation. Please contact Steven Wojcik, the National Business Group on Health's Vice President of Public Policy, at (202) 558-3012, if you would like to discuss our comments in more detail.

Sincerely,



Brian J. Marcotte
President and CEO

The Honorable John Thune (R-SD)
The Honorable Tom Carper (D-DE)
The Honorable Mike Kelly (R-PA)
The Honorable Earl Blumenauer (D-OR)