



On March 26, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) signed into law important provisions that will affect FSAs, HSAs and HRAs.

Effective Immediately:

- HSA-qualified plans can cover telehealth and other remote care service expenses that are **below the HDHP statutory deductible limit**, at no or low-cost sharing. This will not affect an account holder's ability to continue contributing to their HSA. This provision will last until December 31, 2021.
- **Over-the-counter (OTC) drugs** and medicine can be paid for or reimbursed through an FSA, HRA or HSA without a doctor's prescription.
- **Menstrual care products** are now considered a **qualified medical expense** and are eligible for reimbursement or payment through an FSA, HRA or HSA. The provision applies to all expenses incurred after December 31, 2019 and has no expiration date.

For most FSAs and HSAs, OTC purchases are already allowed under the existing IRS guidelines and would incorporate the changes listed in this bulletin. Most HRAs also currently allow OTC purchases, however, there are a few that do not. If your plan currently does not allow for OTC purchases, a Plan amendment would be required.