

# Care for the Common Good

## Health Savings Accounts

Guardrails to protect comprehensive coverage



Trinity Health is one of the largest not-for-profit, Catholic health care systems in the nation, serving diverse communities across 23 states. We advocate for public policies that promote the common good including sustaining our faith-based mission, improving community health, and growing our workforce while addressing the continuously shifting national health care system landscape.

### Federally funded HSAs could improve affordability—if they strengthen, not replace, comprehensive coverage

To address health care affordability and the expiration of the Affordable Care Act (ACA) tax credits, policymakers are considering federally funded Health Savings Accounts (HSAs). Comprehensive coverage remains essential to protect patients from unexpected costs and ensure access to high-value care. HSAs and Individual Coverage Health Reimbursement Arrangements (ICHRAs) can help individuals purchase more affordable coverage and engage more actively in health care decisions. However, these tools should complement—not replace—robust insurance, ensuring savings are not achieved by shifting financial risk to patients through inadequate coverage.

When thoughtfully designed, federally funded HSAs can help low-income beneficiaries access essential care. Income-indexed HSAs that promote regular use of primary and preventive services may also improve care utilization and reduce avoidable, high-cost medical debt.

To avoid discouraging preventive and routine care, HSAs should include strong consumer protections and must not weaken requirements for comprehensive coverage or essential health benefits. **Maintaining robust, affordable insurance options remains critical to ensuring access to necessary care.**

### HSA and health insurance plan policy guardrails

To protect the integrity of a federally-funded HSA and reduce barriers to care, the following safeguards are essential:

- Require enrollment in comprehensive, ACA-compliant health insurance.
- Provide income-based federal HSA contributions aligned with ACA cost-sharing reduction principles.
- Include an out-of-pocket maximum to prevent catastrophic costs from depleting HSA funds.
- Ensure insurance plans maintain 100% coverage of preventive care.
- Allow HSA funds to be used for qualified medical expenses, including IRS-approved expenses, premiums, out-of-pocket costs, and over-the-counter medications.
- Limit federal HSA funds to health care related expenses only.
- Ensure access to high-quality, transparent navigation assistance to help consumers make informed coverage decisions, including:
  - Personalized plan guidance based on health and financial needs.
  - Standardized, transparent disclosures.
  - Clear and impartial incentive structures.
  - Support in understanding HSA rules, premiums, cost sharing, and provider networks.

#### Mission

We, Trinity Health, serve together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities.

#### Core Values

Reverence • Commitment to Those Experiencing Poverty • Safety • Justice • Stewardship • Integrity