

Comparing HSAs and FSAs

	HSA	Health care FSA
What does it stand for?	Health savings account	Health care flexible spending account
Who owns it?	Account holder	Employer
Who funds the account?	Account holder, employer and others	Typically by account holder, but employer can contribute
What type of corresponding health plan is allowed?	Eligibility to contribute requires opening and maintaining a qualifying high-deductible health plan.	A full purpose health care FSA is compatible with any type of health plan coverage. A limited purpose health care FSA (LPIFSA) is typically used in conjunction with participation in an HSA and its qualifying high-deductible health plan.
Can unused amounts carry over?	Yes. The individual owns the account and any contributions made to it, regardless of the source or timing of the contribution.	Yes, by plan design, a plan may allow up to a specified amount to carry forward to future plan years. This is an optional plan feature. If the plan does not have a carryover, any remaining balance at the end of the plan year is forfeited.
Is the account portable between employers?	Yes. The individual owns the account.	No. FSAs cannot be rolled over to a new employer.
How is it funded?	Money is deposited directly into the account. Contributions can be made by the account holder or employer through pre-tax salary deduction, or on an “after-tax” basis by account holder or other person.	Based on the account holder’s annual election, the employer designates a specific amount of wages to be deducted from the account holder’s payroll check pre-tax.
Does interest accrue?	Interest may accrue in an HSA, depending upon the custodian and the type of deposit account.	Interest does not accrue.
Is the account subject to COBRA continuation?	No. An HSA is not a health benefit plan subject to continuation.	COBRA rights apply.

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What is the contribution amount?	Annual contribution limits are established by the IRS and indexed for inflation. Please refer to the IRS contribution/deductible guidelines sheet for specifics.	The annual maximum amount of account holder contribution is established by the IRS. This is subject to change annually with IRS cost of living adjustments (COLA).
Is there a “catch-up” contribution provision for older workers?	Account holders ages 55 and older may contribute an additional \$1,000 to the account per year until they are enrolled in Medicare.	–
Can the account be funded with pre-tax salary deduction?	Yes	Yes
Is vesting allowed?	An HSA is an individual deposit account owned by the account holder. The funds are available as they accrue in the account.	Funds are available for use with qualified health care expenses on the first day of the plan year.
Is investing allowed?	Yes	No
What are the tax benefits for account holder?	Contributions are tax deductible, interest earnings and capital gains on investments are income tax-free. Withdrawals for qualified medical expenses are tax-free, although state taxes may apply.	Account holder contributions are exempt from federal and FICA tax as well as most state and local tax. Reimbursements are tax-free.
What health care expenses can be paid from the account?	Funds can be used for any qualified medical expense as defined under section 213(d) of the internal revenue code (IRC), except for health insurance premiums, with specific exceptions.	Funds can be used for qualified health care expenses as defined under section 213(d) of the IRC except for health insurance premiums.
Can COBRA premiums be reimbursed from the account?	Yes. Distributions to pay premiums for COBRA are tax-free.	No. A health care FSA may not reimburse participants for premiums paid for health insurance. This includes premiums paid for health coverage under a plan maintained by the employer or the account holder’s spouse or dependent.

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Can funds be used for non-health care expenses for those under age 65?	Non-health care distributions must be included in gross income and are subjected to a 20% penalty tax. An exception to the 20% penalty applies to distributions for non-qualified expenses for those individuals who are disabled or deceased.*	No. A health care FSA can only be used for qualified health care expenses.
Can funds be used for non-health care expenses for those over age 65?	Yes. Non-health care distributions must be included in gross income but are not subject to the additional 20% tax penalty.*	No. The health care portion of an FSA can only be used for qualified health care expenses.
Must a health care expense be incurred during the plan year the contribution is made?	No. Expenses are qualified for reimbursement once an HSA is established.	Yes, if the plan does not have a grace period or carryover feature.
Is the annual amount of the contribution available on the first day of coverage?	Only the amount currently available in the HSA may be used to pay or reimburse qualified expenses.	Yes. The total amount elected by the account holder for the plan year must be available on the first day, regardless of the amount contributed.
Is third-party substantiation of expenses required?	No. If audited by the IRS, the account holder shows that HSA funds were used only for qualified medical expenses.	Yes. Each request for reimbursement must be substantiated before it can be reimbursed.
Can the account be integrated with other accounts?	Yes. An HSA can be combined with a limited purpose health care FSA (LPFSA) for use with qualified dental and vision expenses.	A health care FSA is compatible with a health reimbursement account (HRA), but only a limited purpose health care FSA can be integrated with an HSA.

*HSA funds used for non-qualified medical expenses are taxed and subject to a 20% penalty if the HSA holder is less than 65 years of age. After age 65, HSA funds for non-qualified medical expenses are taxed (but not penalized).

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