



FAQs for Specific Situations During the Covid-19 Pandemic

Q: What changed regarding reimbursement of over-the-counter drugs and medicines due to the CARES Act?

A: The CARES Act, a landmark stimulus bill passed by Congress on 3/27/2020, includes a provision repealing an ACA rule from 2010 that required a prescription for reimbursement of over-the-counter (OTC) drugs and medicines from Health FSAs, HSAs, and certain HRA plans that include all IRS-allowed out-of-pocket medical/dental/vision expenses. This is retroactive to the beginning of the year, so any OTC drugs and medicines (such as pain relievers, cold and allergy medicines, acne treatments, and many others) purchased since 1/1/20 and within your current plan year are now reimbursable without a prescription. Also, the CARES Act added menstrual care items to the eligible items list.

Q: What about vitamins and supplements like Airborne, and OTC non-drug items like bandages?

A: Vitamins and supplements require a Letter of Medical Necessity for reimbursement, not a prescription; this requirement has not changed. Non-drug OTC medical supplies and equipment such as bandages and thermometers did not previously require a prescription or Letter of Medical Necessity (unless the item was dual-purpose), and this has not changed either.

Q. Are face masks, gloves, hand sanitizer or other PPE expenses FSA-eligible?

A. Based on IRS rules, these items are not considered eligible expenses under a Health FSA.

Q. My dentist charges a PPE fee for each visit to cover the cost of these expenses in their office. Can I be reimbursed for that fee?

A. If the fee is required in order for you to receive care at your provider's office, then that fee would be considered eligible.

Q: Can I use my Health FSA for virtual or telehealth (like Teledoc) visits with my health care provider?

A: Yes, a general purpose Health FSA can be used for virtual or Teledoc visits.

Q: My doctor offers a plan that allows me to pay a single membership fee for a premium access to a variety of services for a full year. Is that eligible under my Health FSA?

A: If your doctor charges a medical concierge or membership for to cover a variety of services up front, you may be eligible to be reimbursed for actual services rendered by your provider after they have taken place with an itemized list of services performed, including dates of services. Any fees not applied to actual medical services rendered cannot be reimbursed.

Q. My doctor's office is closed, so I'm unable to obtain a receipt for reimbursement. Can I just submit a claim form for the amount I paid to be reimbursed?

A. Self-substantiation is still not permitted, so you will need to submit an itemized receipt for reimbursement. However, in many cases, the amount of time you have to obtain and submit your receipts has been extended. Our Customer Service Department can assist you with the claim submission deadlines specific to your plan.

Q. I set up my Health FSA because I was planning to have an elective surgery, but now that isn't possible. Can I get a refund on the amount I put in my Health FSA?

A. Automatic refunds are not permitted. You must incur actual eligible expenses to receive reimbursement from your Health FSA.

Q. I have an HSA in conjunction with my employer's High Deductible Health Plan that provides pre-deductible coverage for telehealth or virtual visits. Can I still contribute to my HSA?

A. The CARES Act allows HSA HDHPs to cover telehealth services for any condition before the deductible is met, so this does not impact your ability to contribute to your HSA at this time. This provision will last until December 31, 2021.

Q. Are virtual summer camps or after school programs eligible for dependent care reimbursement?

A. There has been no change to the definition of dependent care of related eligible expenses that would allow on-line or virtual camps or programs to be eligible for reimbursement, so these would not be considered eligible expenses. Dependent care expenses must be for the actual care and protection of the child so the parents can work full time.

Q. My child attends in-person day care during the summer so I can work full time. Since his school is going to be entirely on-line he will still be going to the same day care in person, but they will help with on-line school. Can I still submit this cost for dependent care reimbursement?

A. If the primary purpose is custodial care so the parents can work full time it would be reimbursable, but if the day care is charging any extra amount or tutoring/educational fee for helping with on-line school then the excess cost for education would not be eligible.

Q: I have a transportation reimbursement plan, but now I'm working at home and don't have transit or parking expenses. Can I change my election?

A: Yes, you can change transit and parking deductions on a prospective monthly basis. No qualifying event is required.
