

	QSEHRA	ICHRA	EBHRA
Provided by	Employers with fewer than 50 employees	Employers; no limit on size	Employers; no limit on size
Funded by	Employer only	Employer only	Employer only
Reimbursable expenses	IRC Section 213(d) qualified medical expenses, including insurance premiums; employees choose their own individual coverage	IRC Section 213(d) qualified medical expenses, including insurance premiums; employees choose their own individual coverage	Limited excepted benefits; premiums for STLDI, COBRA; out-of-pocket IRC Section 213(d) medical expenses (except premiums)
Contribution/reimbursement limits	Single: \$5,300 in 2021 Family: \$10,700 in 2021	None (employer determines)	\$1,800 in 2021
Tax treatment of contributions/reimbursements	Tax-deductible by the employer; not taxable to the employee	Tax-deductible by the employer; not taxable to the employee	Tax-deductible by the employer; not taxable to the employee
Design flexibility	Generally, must be offered to all regular, full-time employees (limited classes may be excluded), on the same terms; cannot vary benefits among participating employees Plans can be designed to cover any or all allowable expenses	Can be limited to certain employee classes; can vary terms <i>within</i> a class based on age and number of dependents Plans can be designed to cover any or all allowable expenses	Must be offered on the same terms to all employees within the same employee class Plans can be designed to cover any or all allowable expenses
Carryover of funds	Permitted; not required (all unclaimed funds belong to the employer)	Permitted; not required (all unclaimed funds belong to the employer)	Permitted; not required (all unclaimed funds belong to the employer)
Other employer-provided coverage	Not allowed	Employer can also offer a traditional group plan; however, a traditional plan and an	Must be offered in conjunction with a traditional group plan; however,

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		ICHRA cannot be offered to the same employee class	employee does not have to participate in group plan in order to participate in an EBHRA
Employee requirements	Must have and maintain minimum essential coverage	Must have and maintain qualified individual health insurance	None
HSA/HDHP compatible	Can contribute to an HSA only if QSEHRA is designed to reimburse premiums only	Can contribute to an HSA only if ICHRA is designed to reimburse premiums only	Can contribute to an HSA only if EBHRA is designed to reimburse premiums (for limited benefits) only
Premium tax credits	Available if employee is eligible; must be offset by QSEHRA reimbursement	Not available if the employee accepts ICHRA reimbursements	Not applicable
Considered a group plan subject to ERISA and COBRA	No	Yes	Yes