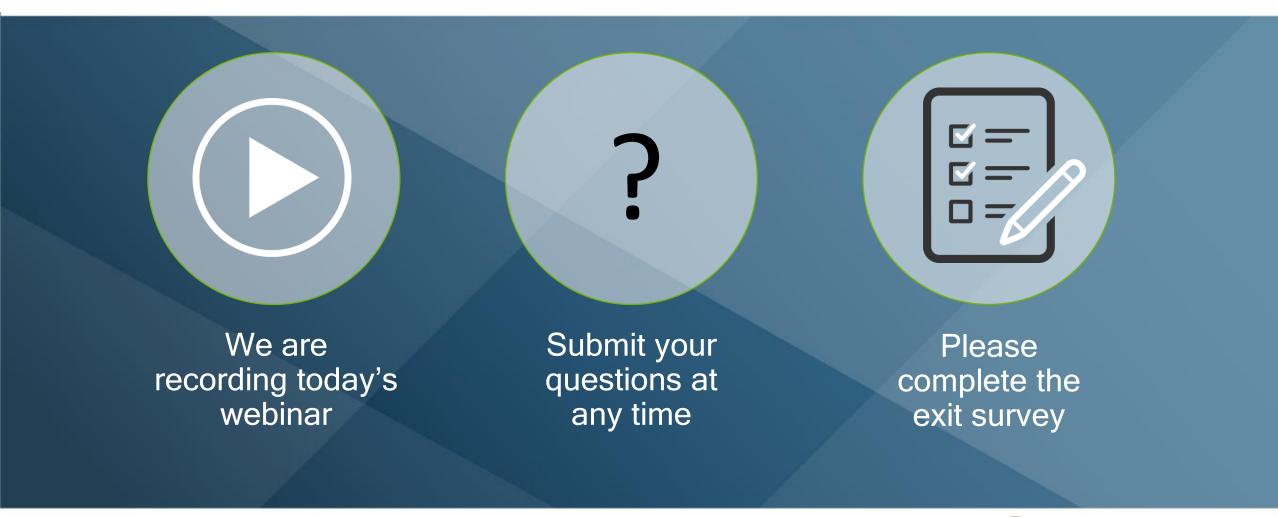




September 10, 2025

Individual Coverage Health Reimbursement Arrangements (ICHRA): The Benefit On the Rise

Before We Begin



Coast to Coast Administration



Technology Driven HR Solutions to Take Your Company Further

Suite of HR Benefits, Payroll and Leave Management, and Compliance solutions offered individually or bundled.



> Presenter



Maren Thompson

Maren is a Regional Director at BASIC, serving businesses from the West Coast to Montana. With nearly a decade of experience in account management, combined with her industry expertise, Maren has proven to be a valuable ally for brokers and their diverse portfolios of clients. After seven years with BASIC, Maren has quickly developed lasting relationships with broker partners to ensure their clients have the best benefits administration and compliance solutions possible.

What is an ICHRA?

- Introduced in 2019
- New type of HRA
- Fulfill offer of coverage for Applicable Large Employer (ALE)



> ICHRA Overview

- Employer size
- Employee eligibility
- Other eligibility
- Contribution limits
- Eligible expenses
- Notice requirements
- Compliance



Group Benefits vs. an ICHRA

Traditional Group Benefits

- Annual renewals are cumbersome
- Human resources have to be heavily involved in the administration and management of the employee benefits
- Employees have limited choices of coverage options
- Dependents have to receive the same benefits as the employee
- There are limited plan choices, often only one or two plans
- Participation requirements as high as 60%

ICHRA Benefits

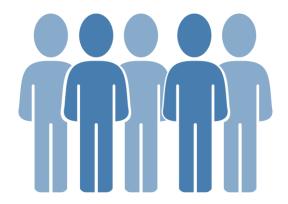
- Human resources no longer has to manage or administer benefits for employees
- Employees can find plans that are right for them, and their dependents
- Each employee can pick their own plan; it's no longer a one size fits a few health plan
- Depending on the county, employees can choose from many carriers, and 20+ plans
- No minimum participation requirements

Group Benefits vs. an ICHRA

Traditional Carrier Model



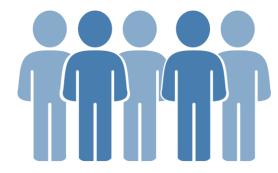
Single Carrier



ICHRA Model







Carrier #1

Carrier #2

Carrier #3

Carrier #4

Carrier #5

Employer Class Design

Employer can choose to structure the eligibility and contribution criteria using 11 employee classes defined by the ICHRA regulations:

- Full-time employees
- Part-time employees
- Seasonal employees
- Salaried employees
- Non-salaried employees (such as hourly)
- Employees covered by a particular collective bargaining arrangement (different bargaining units can be separate classes)
- Employees who have not satisfied a waiting period
- Temporary employees of staffing firms
- Non-resident aliens with no US-based income
- Employees working in the same insurance rating area (geographic location, state or region)
- Any combination of two or more of the above



Class Rules

Minimum Class Size Rule:
 Applies only if employer offers a traditional GHP to one class of employees and an ICHRA to another class based on:

- Full-time vs. part-time status
- Salaried vs. non-salaried status
- Geographic location (if smaller than a state)
- Combination of any class above with any other class (except waiting period class)
- Minimum Class Size is:
 - 10% of total # employees



Contribution Strategies

Employers define the monthly amount they want to contribute to the ICHRA; it can be as little (provided it is affordable) or as much as they want. With an ICHRA there are no minimum or maximum contribution limits.

Contribution examples:

- **Defined Contribution** by giving all employees \$\$\$ (flat amount) per month. May vary by class and status.
- Define the Employer Contribution by "benchmarking" by age band.
- Define the Employer Contribution by "benchmarking" to a tier-based plan.



> ICHRA Reimbursement of Premiums

Can reimburse premiums for:



- Individual Market
- State or Federal Exchange
- Medicare and Medicare Supplement (regardless of size of employer)

Cannot reimburse premiums for:



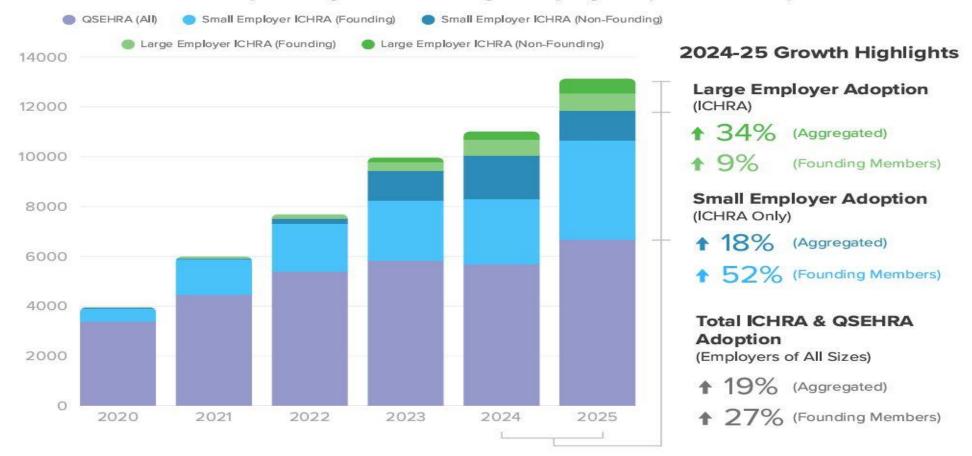
- Spousal Group Coverage
- Fixed indemnity plans
- TRICARE



ICHRA Trends

> ICHRA Adoption is Up

ICHRA & QSEHRA Adoption by Small & Large Employers (2020-2025)



Source: HRA Council Growth Trends for ICHRA & QSEHRAS, vol 2024-2025 The US Treasury department expects that by the end of 2030, 800,000 employers will offer an ICHRA, and more than 15 million employees will have an ICHRA.

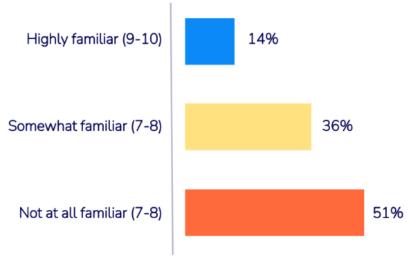
Attributed to the Center for Medicare
 & Medicaid Services



> Employer Perspective

Employers are increasingly open to learning about ICHRA—especially when proactive education is provided.

EMPLOYERS' FAMILIARITY WITH ICHRA



Base: General Employer Sample, Not Currently Offering ICHRA, n=81

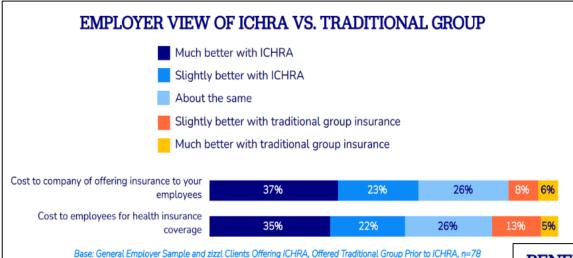
WHERE EMPLOYERS WOULD GO TO LEARN MORE ABOUT ICHRA

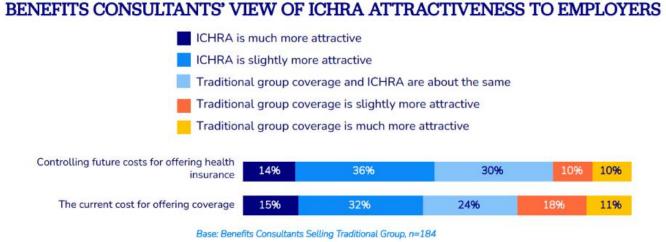


Base: General Employer Sample, n=204 Multiple Response

Source: 2025 Deft Research Study, 2025 ICHRA Report

Cost: A Priority for Employer & Brokers Alike



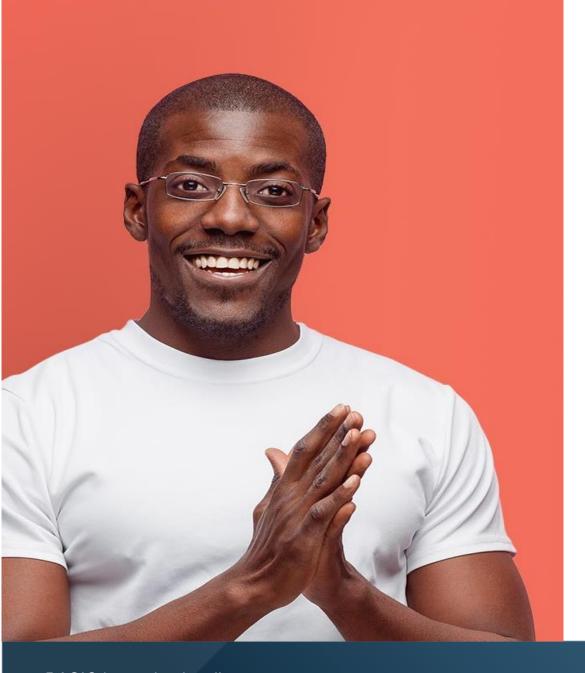


Source: 2025 Deft Research Study, 2025 ICHRA Report



Challenges Facing Employers Today

- Health care costs
- Recruiting and retention
- "One-size-fits-few" insurance
- ACA non-compliance
- ACA mandates for Applicable Large Employers (ALEs)

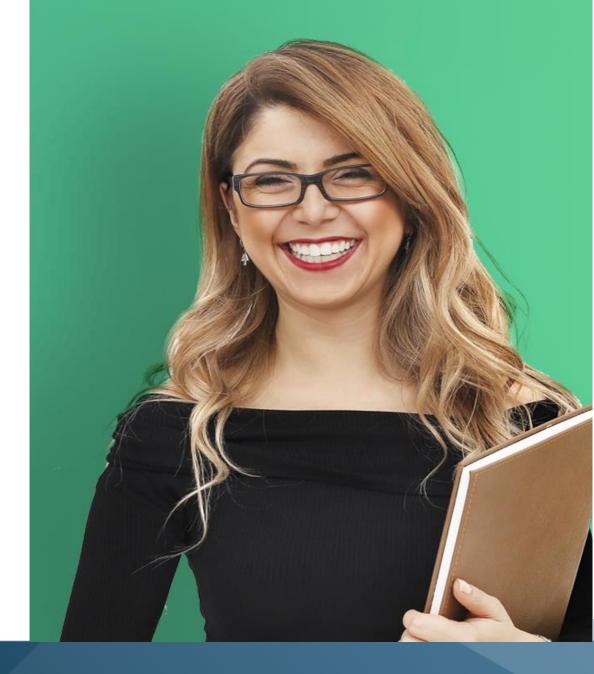


Employer Benefits

- Flexibility
- Attraction/Retention
- Controlled Costs & Risks
- ACA Compliance
- Tax Efficiency
- Administration Reduction

> Employee Benefits

- Presents more plan options
- Provides tax advantages
- Provides plan portability
- Provides privacy
- Creates trust and sense of care



BASIC's Solution

Benefits Integration with COBRA

Introducing BASIC's New Platform

- ✓ All COBRA & Benefit Accounts on one platform
- ✓ COBRA clients have easy access to

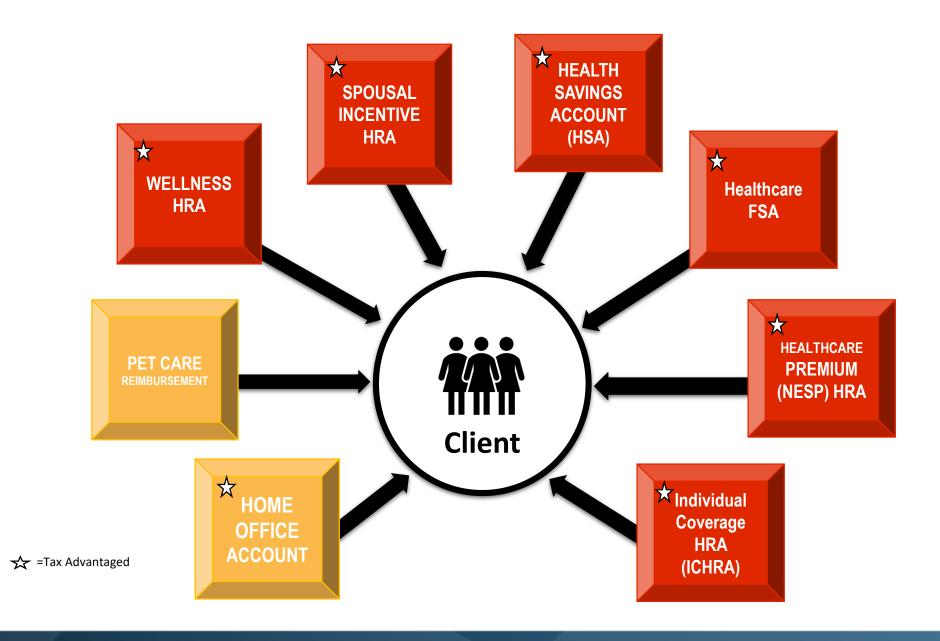
 "Endless Aisle" of CDA benefit accounts
- ✓ Employee-Centric: respond to & manage diverse needs of workforce at any life stage
- ✓ Vendor consolidation
- ✓ Peace of Mind: Audit Guarantee and Hold Harmless



One Integrated Experience

- One Platform
- One Single Sign-on
- One Mobile App
- One Debit Card
- Includes:
 - 50+ Benefit Accounts
 - COBRA
 - State COBRA
 - Retiree Billing
 - Leave of Absence Billing





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> ICHRA Account Features

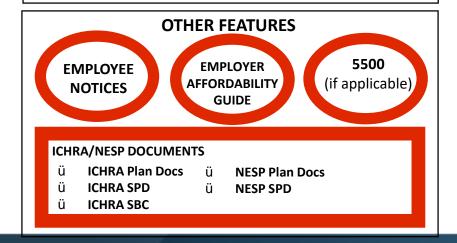


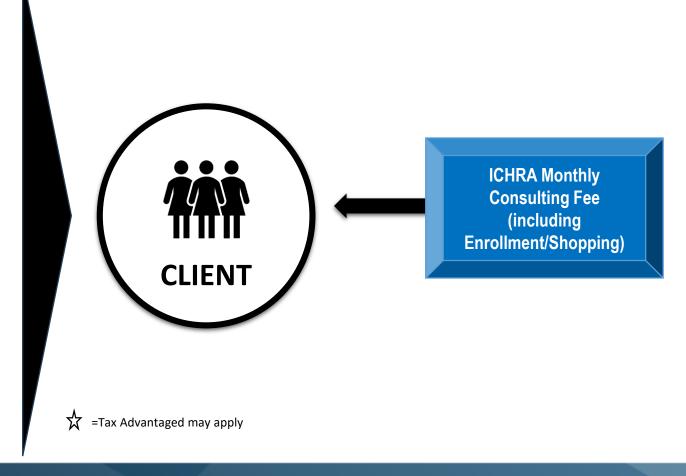
- ✓ DIRECT PAYMENT ICHRA
- ✓ REIMBURSEMENT ICHRA
- ✓ NON-EMPLOYER SPONSORED PREMIUM (NESP)

DIRECT PAYMENT ICHRA FEATURED ACCOUNTS

EMPLOYEE
PREMIUM
(Pre or Post tax
deduction)

PREMIUM PROTECTION

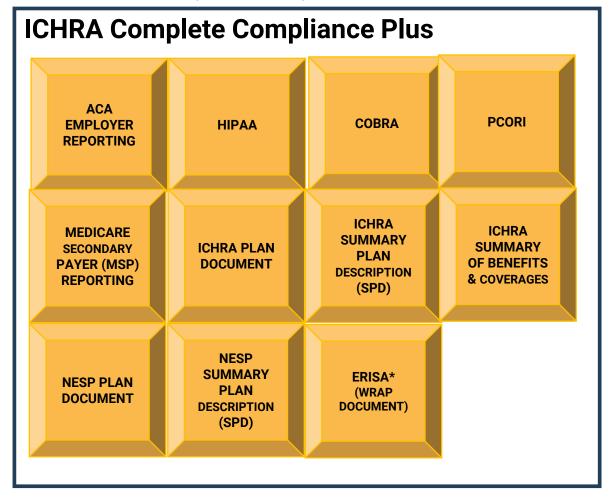




> ICHRA Compliance

ICHRA Complete Compliance ACA COBRA PCORI HIPAA **EMPLOYER REPORTING ICHRA MEDICARE ICHRA** SUMMARY **ICHRA PLAN** SUMMARY **SECONDARY** PLAN **OF BENEFITS** PAYER (MSP) **DOCUMENT DESCRIPTION REPORTING** & COVERAGES (SPD) **NESP SUMMARY NESP PLAN PLAN DOCUMENT DESCRIPTION** (SPD)

*ERISA includes the Wrap document and applicable 5500 for any group sponsored benefit plans (i.e. dental, vision, life, etc.).



Before Q&A



QUESTIONS





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BASIC Sales 888-602-2742

THANK YOU

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