

# Comparison chart – HSA/FSA/HRA plans

Updated with 2026 information

	HSA	FSA	HRA
Small employers (1-50)	Yes	Yes – Blue Cross will offer only to groups 5+.	Yes – Group of 1: Employee not owner, see self-employed.
Large employers (51+)	Yes	Yes	Yes
Self employed or individuals	Yes	No	No
Contributions	For 2026: \$4,400 for self-only HDHP \$8,750 for family HDHP \$1,000 catch up provisions for age 55 and older.	\$3,400 contribution limit; employer can set limit.	No IRS limit; employer can set limit.
Use it or lose it?	No	At employer discretion – member may carry over up to 20% of the annual medical maximum for use in the entire next Plan Year. Otherwise, it's use it or lose it.	No – IRS Yes – employer
Can salary reduction be used to fund?	Yes – doesn't have to be.	Yes – doesn't have to be.	No
Ownership	Employee	Employer	Employer
Interest accumulation?	Yes	No	No
Non-medical use?	Yes, with tax and penalty.	No	No
Substantiation of expenses?	Not unless requested by IRS.	Yes	Yes
Discrimination test?	Employer must make comparable contribution to all similarly situated employees.	Yes	Employer must make comparable contribution to all similarly situated employees.
Funded?	Yes	Employer bookkeeping account	Employer bookkeeping account
High deductible minimum plan required?	For 2026: Annual deductible not less than \$1,700 individual/\$3,400 family.	No	No
High deductible max out-of-pocket (not premiums)	For 2026: Maximum of \$8,500 individual/\$17,000 family.	Not applicable	Not applicable
Subject to COBRA?	No, employee can withdraw until funds depleted.	Yes, employee must continue to contribute.	Yes
Account retained by employee upon termination?	Yes, until account depleted.	No. The account is retained by employer but employee has access for services prior to termination.	Yes, if employee is set up on COBRA.



	HSA	FSA	HRA
Coordination with other accounts	HSA will reimburse medical expenses until HDHP deductible met. Until then, FSA limited to vision, dental & preventive care. After deductible satisfied, FSA will reimburse all 213d expenses.	May be coordinated with HRA. For coordination of HSA/FSA, see HSA.	May be coordinated with FSA.
Trust required?	Yes	No	No
Reimburse premiums?	Continuation/COBRA coverage, LTC or while unemployed, Medicare but not Medicare Supplement.	No	COBRA only.
Tax treatment contributions	Contributions excludable (pre-tax) or deductible (post-tax) by employee. Employer excludes from gross income and pays no FICA only in pre-tax situation.	Excludable by employee.	Excludable by employee.
Tax treatment distributions	Distribution for qualified medical expenses is not taxable. Distribution for non-qualified expenses is taxable and subject to penalty.	Distribution for qualified medical expenses is not taxable.	Distribution for qualified medical expenses is not taxable.
Offer through Section 125 cafeteria plan?	Can be offered through cafeteria plan or not.	Yes	No
Availability of full benefits throughout the year?	Limited to current accumulated contributions.	Yes	Yes
When contributions are made	Any time prior to filing income tax for the applicable year.	By pay period throughout the year.	As stated by HRA plan.
Deductible carryover?	No – HDHP	Not applicable	Yes
Mandated nervous and mental benefits?	No – HDHP	Not applicable	Yes
Deductible credit at status change?	Yes – HDHP	Not applicable	Yes
Deductible credit at enroll from commercial?	No – HDHP	Not applicable	Yes, according to current guidelines.
Does standard high/low underwriting apply?	No	Not applicable	Yes
Grace period and runout period	Not applicable	If the employer does not allow carry over, grace period up to 2.5 months; runout not to exceed 90 days.	Not applicable

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