



HSA GPS Fact Sheet Series

HSAs and Partial-Year Eligibility

Health Savings Account (HSA) rules generally apply to calendar years, regardless of when your company's benefits renew, you join the plan, or you disenroll. In this paper, we travel to the intersection of HSAs and partial-year eligibility to help you maximize your opportunity to build HSA balances, minimize your taxable income, and remain compliant with HSA regulations.

1. How are HSA contribution limits tracked?

The contribution limits imposed by the Internal Revenue Service (IRS) are tracked on the calendar year. The 2019 limits are:

Self-only coverage:	\$3,500 (up from \$3,450 in 2018)
Family coverage:	\$7,000 (up from \$6,900 in 2018)
Catch-up (age 55+):	\$1,000 (fixed figure not subject to annual adjustment)

2. How is my contribution limit affected if I lose my eligibility during the year?

You must pro-rate your contribution based on the number of months during which you were HSA-eligible as of the first day of the month.

Example: You enroll in Medicare Part A (a disqualifying event) effective Oct. 1, 2019. You were covered on a self-only contract during the first 10 months of the year. Your maximum contribution for 2019 is 10/12 of \$3,500, or \$2,916.66. In addition, assuming you're age 55 or older, you can contribute 10/12 of \$1,000, or \$833.33. Total 2019 contribution if you're age 55 or older: \$3,750.00.

3. How is my contribution limit affected if I become HSA-eligible during the year?

If you enroll between Jan. 2 and Dec. 1, you can adopt one of two approaches:

- *Pro-rate*: You can pro-rate your contribution based on the number of months that you were HSA-eligible, as outlined above. For example, if you start a new job Oct. 15, 2019, enroll in an HSA-qualified medical plan immediately and meet all eligibility requirements, you aren't be HSA-eligible until Nov. 1. You can contribute no more than 2/12 of the \$3,500 annual maximum (self-only contract), or \$583.33. The comparable figure for family coverage is \$1,166.66.
- *Last-Month Rule*: If you become eligible by Dec. 1, you can contribute up to the contribution limit for the calendar year (in our example, up to the full \$3,500 rather than only \$583.33). You must remain HSA-eligible through the "testing period" (through the end of the *following* calendar year). If you lose eligibility before the end of the testing period for any reason other than disability or death, any contributions in excess of the pro-rated amount (up to \$2,916.66) are included in your taxable income and subject to an additional 10% penalty unless you lose HSA eligibility during the testing period as a result of disability or death.

4. How is my contribution limit affected if I switch from self-only to family coverage during the calendar year?

See the answer to question 3. You can add your monthly contribution limits or use the Last-Month Rule to make a full family contract contribution and maintain coverage through the testing period.

Example: You're under age 55 and have self-only coverage through your May 4, 2019, wedding, then family coverage for the remainder of the year:

- *Pro-rate*: *Contribute up to the monthly maximum of \$291.66 per month for a self-only contract (\$3,500/12 months) for January through May (total \$1,458.33) and the monthly maximum of \$583.33 for a family contract (\$7,000/12 months) for June through December (total \$4,083.33), for a total of \$5,541.66. You face no testing period if your contribution doesn't exceed this amount.*

- **Last-Month Rule:** *You contribute up to the family contract maximum of \$7,000. If you don't remain HSA-eligible through the end of 2020 (the testing period), any 2019 contribution in excess of \$5,541.66 (the pro-rated maximum) is included in your taxable income and subject to an additional 10% penalty unless you die or are disabled.*

5. How is my contribution limit affected if I switch from family to self-only coverage during the calendar year?

You must pro-rate your contribution, since you don't have family coverage as of Dec. 1. If you cover yourself and a child and the child ages off the medical plan July 31, 2019, you can make up to seven months of family contribution (\$3,083.33) and up to five months of self-only contributions (\$1,458.33) for a maximum of \$5,541.66 for the year. You face no testing period.

6. How is my contribution limit affected if I lose HSA eligibility temporarily, for example by receiving services at a Dept. of Veterans Affairs (VA) or Indian Health Services (IHS) facility that disqualify me temporarily from HSA eligibility?

When you receive non-preventive care from these facilities (or treatment for a non-service related condition at the VA), you lose eligibility for three full months following your receipt of the services.

Example 1: You injure your knee playing tennis and undergo an examination and MRI at a VA facility on June 25, 2019. You lose your HSA eligibility for July, August and September. You can pro-rate your contributions (nine months total, or a maximum contribution of \$2,625 for self-only coverage and \$5,250 for family coverage) or use the Last-Month Rule to contribute up to the maximum (\$3,500 or \$7,000) and remain HSA-eligible through the testing period.

Example 2: Same injury as above, but you receive care at the VA on Oct. 6, 2019. You lose HSA eligibility for November, December and January. You're not HSA-eligible Dec. 1, so you can't take advantage of the Last-Month Rule. Instead, you must pro-rate your 2019 contribution to reflect the number of months during which you were HSA-eligible as of the first day of the month. Assuming that you were HSA-eligible all months prior months leading up to your VA visit, you can contribute 10/12 of the maximum contribution for your contract type (\$2,916.66 for self-only or \$5,833.33 for family coverage) into your HSA for that year.

Table of Pro-Rated Contributions for 2019

Months Eligible	Self-Only Under 55	Self-Only 55-Plus	Family Under 55	Family 55-Plus	Catch-up Only
1	\$ 291.66	\$ 375.00	\$ 583.33	\$ 666.66	\$ 83.33
2	\$ 583.33	\$ 750.00	\$ 1,166.66	\$ 1,333.33	\$ 166.66
3	\$ 875.00	\$ 1,125.00	\$ 1,750.00	\$ 2,000.00	\$ 250.00
4	\$ 1,166.66	\$ 1,500.00	\$ 2,333.33	\$ 2,666.66	\$ 333.33
5	\$ 1,458.33	\$ 1,875.00	\$ 2,916.66	\$ 3,333.33	\$ 416.66
6	\$ 1,750.00	\$ 2,250.00	\$ 3,500.00	\$ 4,000.00	\$ 500.00
7	\$ 2,041.66	\$ 2,625.00	\$ 4,083.33	\$ 4,666.66	\$ 583.33
8	\$ 2,333.33	\$ 3,000.00	\$ 4,666.66	\$ 5,333.33	\$ 666.66
9	\$ 2,625.00	\$ 3,375.00	\$ 5,250.00	\$ 6,000.00	\$ 750.00
10	\$ 2,916.66	\$ 3,750.00	\$ 5,833.33	\$ 6,666.66	\$ 833.33
11	\$ 3,208.33	\$ 4,125.00	\$ 6,416.66	\$ 7,333.33	\$ 916.66
12	\$ 3,500.00	\$ 4,500.00	\$ 7,000.00	\$ 8,000.00	\$ 1,000.00

This information is accurate as of Nov. 5, 2018. Please note that this discussion is for informational purposes only and is based on current regulations. It doesn't represent, and shouldn't be construed as, a substitute for professional advice. Please consult your personal legal, financial, or tax counsel to discuss your personal situation and refer to IRS Publication 969.

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