Banking Compliance

A compliance health check on your HSA documents

Health Savings Account (HSA) historical updates

Custodial (includes Self Directed) and Trust

This document provides a detailed summary of compliance changes to Wolters Kluwer HSA documents

Detailed changes from 2026 to 2021

2026
(2027 COLA updates)

Health Savings Account (HSA) Disclosure Statement

- Amended *HSA Eligibility* section's *High-Deductible Health Plan* subsection 2: Updated the chart to remove the 2025 tax year amounts and add the 2027 and later year amounts
- Amended *HSA Contributions* section's *Regular or Annual Contributions, Maximum Annual Contributions* subsection 2.a.: Updated the chart to remove the 2025 tax year amounts and add the 2027 and later year amounts

2025
(2026 COLA updates)

Health Savings Account (HSA) Disclosure Statement

- Amended *HSA Eligibility* section's *Eligibility for an HSA* subsection 1.b.; added direct primary care service arrangements as an example of an exception to the prohibition of coverage by another type of non-HDHP health plan
- Amended *HSA Eligibility* section's *High-Deductible Health Plan* subsection 2; updated the chart to reflect the plan-related limits for current tax years; added that, effective January 1, 2026, certain individual plans purchased on an Exchange may also be considered an HDHP; and updated reasons for which a plan shall not fail to be treated as an HDHP for failing to have a deductible for preventive care, to now include telehealth and other remote care services
- Amended *HSA Contributions* section's *Regular or Annual Contributions, Maximum Annual Contributions* subsection 2.a.; updated the chart to remove the 2024 tax year amounts and add the 2026 and later year amounts
- Amended *HSA Distributions* section's *Qualified Medical Expenses* subsection: Added that, effective January 1, 2026, fixed periodic fees to pay for direct primary care service arrangements, with certain limitations, may also be considered qualified medical expenses.

2024
(2025 COLA updates)

Health Savings Account (HSA) Disclosure Statement

- Amended *HSA Eligibility* section's *High-Deductible Health Plan* subsection 2; updated the chart for the HDHP limits to remove the 2023 tax year amounts and add the 2025 and later tax years amounts; and clarifications were added that the out-of-pocket expense limit is a maximum amount and that, if the plan uses a network of providers, this limit only applies to deductibles and out-of-pocket expenses that are in-network
- Amended *HSA Contributions* section's *Regular or Annual Contributions, Maximum Annual Contributions* subsection 2.a.; updated the chart for the maximum annual contribution limits to remove the 2023 tax year amounts and add the 2025 and later tax years amounts

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2023
(2024 COLA updates)

Health Savings Custodial Account 5305-C

- Amended Article 11.11(a), *Investment of HSA Assets, Investment of Contributions*; updated by adding a statement: "We will provide you with any required disclosures concerning your specific investments"
- Amended Article 11.11(e), *Nondeposit Investments*; clarified that nondeposits "may" include the investment types detailed

Health Savings Account (HSA) Disclosure Statement

- *Restrictions and Approval* section's *State Laws* subsection 13, "consent" was clarified to be "spousal consent"
- *HSA Eligibility* section's *High-Deductible Health Plan* subsection 2; updated the chart for the HDHP limits to remove the 2022 amounts and add the 2024 and later amounts
- *HSA Contribution* section's *Regular or Annual Contributions, Maximum Annual Contributions* subsection 2.a.; updated the chart for the maximum annual contribution limits to remove the 2022 amounts and add the 2024 and later amounts

2022
(2023 COLA updates)

Health Savings Account (HSA) Disclosure Statement

- Updated the charts, in the *High-Deductible Health Plan* section under *HSA Eligibility* and the *Maximum Annual Contributions* subsection under *HSA Contributions, Regular or Annual Contributions*, to the 2023 annual cost-of-living adjustment (COLA) limits
- Added contributions as another situation where state laws may affect HSAs in the *State Law* section under *HSA Restrictions and Approval*
- Added the following to the *High-Deductible Health Plan* section under *HSA Eligibility*: select insulin products are another deductible for which failure to provide will not cause an HDHP to fail; and clarifications that only actual medical expenses incurred by the covered individual can count towards the qualifying HDHP minimum deductible, and qualifying HDHPs can only provide preventative care before the minimum deductible is met
- Added information regarding types of other medical coverage that may cause HSA ineligibility to the *Permitted Insurance* section under *HSA Eligibility*

2021
(2022 COLA updates)

Health Savings Account (HSA) Disclosure Statement

- Updated to the 2022 annual COLA limits

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