

Congress of the United States
House of Representatives
Washington, DC 20515-3601

RFI Questions:

1. Utilization and Accessibility

- How accessible do you feel ICHRAs are to the businesses and individuals who would benefit most from them?
- What aspects of the current ICHRA model work particularly well in supporting employees' health care coverage needs?
- What barriers do you see for businesses or employees adopting ICHRA coverage models?
- Do you feel business and employees are adequately informed about ICHRA coverage options or are educational improvements needed?
- Would a credit to take up ICHRAs and QSEHRAs incentivize small employers to begin offering ICHRAs or QSEHRAs?
 1. What estimated credit amount per employee or per size of business who elect an ICHRA or QSEHRA would be needed to incentivize offering these types of coverage?
 2. What cost or design considerations would be most critical for a credit like this to succeed?
- What unintended consequences exist tying affordability, for the purposes of offering an ICHRA, to a plan that has a significantly more generous actuarial value than traditional employer-sponsored health insurance is required to have? What flexibilities could be helpful to make ICHRA more affordable to employers to offer quality coverage to employees?

2. Ease of Compliance and Administration

- How manageable is it to comply with ICHRA administrative requirements (e.g., reporting, summary documentation)?
- Are there specific reporting requirements that are challenging for ICHRA plan sponsors to meet or that don't seem to have any practical purpose? If so, please describe.
- What aspects of ICHRA administration could be simplified to ease compliance burdens?
- Would easing of any compliance burdens promote higher ICHRA adoption?

- How effective is a Summary of Benefits (SBC) from the employer in communicating necessary information to employees under an ICHRA model?
 1. Do you believe you have the necessary information to adequately complete an SBC?
 2. Would exempting ICHRAs from providing the SBC simplify administration for ICHRA sponsors? If so, in what ways?
 3. Given that individual coverage SBCs are already provided by issuers, what value, if any, do you see in having a separate SBC for ICHRA participants?

3. Employee Choice and Flexibility

- How satisfied are employers with the range of health care choices available to their employees through ICHRAs?
- How satisfied are employees with the range of health care choices available to them through ICHRAs? Would adoption be stronger if employees had the choice of more than exchange plans?
 1. Do you believe that permitting employee choice between ICHRAs and traditional health plan options could improve employee satisfaction?
- Currently, employers must offer employees either an ICHRA *or* a traditional group health plan. How might offering small employers the option to give employees a choice between an ICHRA and a traditional group health plan give employees more flexibility in choosing the coverage that works best for their family?
- Which option do you believe most employees would choose:
 1. The ability to choose between traditional coverage and ICHRA during open enrollment
 2. Just ICHRA or just traditional coverage, at the discretion of the employer
- What challenges or potential drawbacks do you foresee in allowing small businesses the option to give employees discretion on choosing ICHRA or traditional coverage?