

# Consumer Health Solutions

## HSA-Compliant HRA Designs IRS “Stacking Rules”

### Is there an HRA plan design that can be stacked with HSA Contributions?

Yes, the HRA plan can be designed to allow for HSA contributions if the Statutory Minimum Deductibles are taken into account. For 2026, the Statutory Minimum Deductible is \$1,700 Single/\$3,400 Family.

If your employees are required to pay that amount first, the HRA can then begin reimbursing once those minimums are met. The HRA will run on an aggregate, non-embedded basis.

Example of an Aggregate HRA permitting HSA contributions:

Medical Coverage Tier	Employee Responsibility First	HRA Reimburses Last
Single (\$3,000)	\$1,700	\$1,300
Family (\$6,000)	\$3,400*	\$2,600

\*Any combination of members in a Family Plan must pay the first \$3,400 before the HRA begins to pay.

If the HRA is to run on an embedded basis, then the Statutory Minimum Deductible will be \$3,400 Single, thus requiring the Family Minimum Deductible to be \$6,800.

Example of an Embedded HRA permitting HSA contributions:

Medical Coverage Tier	Employee Responsibility First	HRA Reimburses Last
Single (\$6,000)	\$3,400	\$2,600
Family (\$12,000)	\$3,400 per member up to \$6,800	\$2,600 per member up to \$5,200

### Contact Us:

Please contact your Account Manager to discuss or send a message to [HealthAccounts@consumerhealthsolutions.com](mailto:HealthAccounts@consumerhealthsolutions.com)

