

February 26, 2018

The Honorable John Thune  
511 Dirksen Senate Office Building  
Washington, D.C. 20510

The Honorable Tom Carper  
513 Hart Senate Office Building  
Washington, D.C. 20510

The Honorable Diane Black  
1131 Longworth House Office Building  
Washington, D.C. 20515

The Honorable Earl Blumenauer  
1111 Longworth House Office Building  
Washington, D.C. 20515

Dear Senators Thune and Carper and Representatives Black and Blumenauer:

Thank you for introducing the Chronic Disease Management Act of 2018. The American Bankers Association's HSA Council represents about ninety-four percent of all the Health Savings Accounts (HSAs) in the United States and the millions of Americans who finance their healthcare with these plans. On their behalf, we appreciate your efforts to allow HSA plans the option to cover high-value health care services and medications associated with chronic disease management without a deductible.

HSA-qualified plans generally subject all benefits to some form of cost-sharing, including satisfaction of a minimum deductible. While we believe this is the most efficient plan structure necessary to ensure affordability, we support allowing plan sponsors the option of offering and paying for additional benefits beyond what is currently considered preventive care within the meaning of 26 USC § 223 before the plan deductible is satisfied.

Under current law, covering chronic disease for people enrolled in HSA-qualified plans before they meet their deductible would disqualify the plan and prevent HSA-owners from contributing to their account.

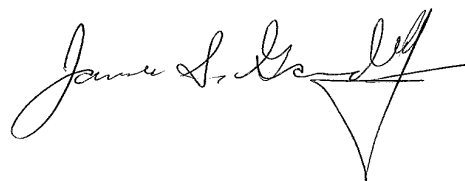
As HSAs become more popular, we believe it is important to increase their flexibility to meet the different demands of a wide array of insured populations. We support the ability of payers to expand coverage so long as expanded coverage choices do not become mandatory. Expanding HSAs' utility to a larger audience will accelerate adoption of these plans and hopefully contribute to a reduction in gross health expenses over time.

We look forward to helping you enact your proposal and thank you, again, for your efforts.

Respectfully,

Handwritten signature of J. Kevin A. McKechnie in black ink.

J. Kevin A. McKechnie  
Executive Director

Handwritten signature of Jim Gandolfo in black ink.

Jim Gandolfo, PNC Bank  
Chairman of the Board of Directors