

DPC + HSAs: What Employers & Members Need to Know

A Transformative Moment for Primary Care and Tax-Advantaged Benefits



The **One Big Beautiful Bill (OB BB)** signed into law long-awaited clarifications and expansions for **Direct Primary Care (DPC)** and **Health Savings Accounts (HSAs)**. These changes, which went into effect January 1, 2026, make it easier for employers to offer lower-cost, higher-engagement benefit plans, and easier for members to use their HSA for everyday primary care.

Key HSA + DPC Provisions in the OB BB

DPC Is HSA-Compatible by Law

For years, there has been regulatory ambiguity around whether individuals could use HSA funds to pay for DPC memberships. The OB BB puts that debate to rest:

- It **explicitly defines DPC as a qualified medical expense**, allowing individuals to pay for DPC with HSA dollars.
- It **ensures that DPC enrollment does not disqualify someone from HSA contributions**, even when paired with a High Deductible Health Plan (HDHP).

More Flexibility for HSA Use and Contributions

The OB BB implements enhancements to HSA rules that allow for more DPC-friendly employer plan designs:

- The OB BB clarifies that **DPC is not a second health plan**, giving employers the green light to formally integrate DPC with HSA-qualified plans.
- The OB BB creates more clarity about **covered services and pricing**:
 - DPC memberships may not cover general anesthesia, medications, or labs not usually included in primary care services. Services provided outside the DPC membership fee may not be paid for by employers.
 - For HSA plans, the cost of DPC may not exceed \$150 per month for individuals and \$300 per month for plans covering more than one member.

What This Means for Employers & Members

Employers can now build smarter benefit strategies by combining:

1 A low-premium HDHP for catastrophic protection

2 An HSA with higher limits to promote long-term savings

3 A monthly DPC membership for 24/7 access to primary care

More Options for Employers

Employers looking to reduce spend while improving employee satisfaction now have a clear, compliant pathway to offer modern, high-access primary care without sacrificing tax advantages or offering unaffordable plans.

What Members Can Expect

- You can pay for a DPC membership with HSA dollars.
- Enrolling in DPC does not affect your ability to contribute to your HSA.
- Your HDHP still covers hospitalizations, specialists, and emergencies.

Interested in DPC?

Ask your employer whether DPC is available in your benefits, or ask your DPC practice how membership works with your HSA.