Understanding Inconsistencies in the Reported Growth in HSA-Eligible Health Plans

It can be challenging to determine how many people are actually enrolled in Health Savings Account (HSA)-eligible health plans and how that number has been changing: there are just a handful of surveys used to determine the number of people enrolled in these plans. Furthermore, the surveys vary materially in the way they collect enrollment data, potentially resulting in over- or underreporting. However, there is one consistency between the enrollment estimates — most sources show that growth appears to have been slowing.

- EBRI/Greenwald & Associates’ Consumer Engagement in Health Care Survey and the National Health Interview Survey conducted by the National Center for Health Statistics (NCHS) found an increase in enrollment from 11 percent to 12 percent between 2017 and 2018.
- The National Survey of Employer-Sponsored Health Plans conducted by Mercer found an increase from 21 percent to 22 percent.
- The Employer Health Benefits Survey conducted by the Kaiser Family Foundation (KFF) found no change over the period.
- Survey of Health Savings Account – High Deductible Health Plans conducted by America’s Health Insurance Plans (AHIP) has not yet reported 2018 statistics, but has found low growth in recent years.

What is Driving the Inconsistencies?

There are a number of factors that could be driving over- or underreporting within the surveys.

- EBRI/Greenwald & Associates and NCHS interview individuals with private health insurance obtained through employment, directly from insurers, or through public exchanges. However, whereas NCHS conducts its survey in both English and Spanish, EBRI/Greenwald & Associates only conduct their survey in English. Further, EBRI/Greenwald & Associates could underreport because enrollment estimates are based on a panel of respondents who have agreed to participate in online surveys.
- KFF and Mercer interview employers to determine enrollment. However, KFF collects data only on employers with three or more workers, and Mercer collects data only on employers with 10 or more workers.
- AHIP surveys insurance companies and obtains estimates for individuals with private health insurance obtained through employment, directly from insurers, or through public exchanges. This could result in underreporting, as many health plans do not respond to the survey.
Several factors may be holding back enrollment into HSA-eligible health plans.

- Recent low health insurance premium increases combined with low unemployment may have caused employers to hold off on plans to move to HSA-eligible health plans.

- Recent research finding that HSA-eligible health plans may be associated with a reduction in appropriate preventive care and medication adherence may cause employers to hold back from adopting HSA-eligible health plans.

- Lack of flexibility around the design of the health plan may also be holding plan sponsors back from adopting these plans.

It is important to note the difference between studies that focus on HSA-eligible health plan enrollment and those that focus on growth in the number of HSA accounts, as these latter studies find evidence of recent growth. Devenir, for example, collects data from about 100 HSA providers and tracks the number of accounts universally. It shows that the number of accounts increased from 16.8 million at the end of 2015 to 25.1 million at the end of 2018. EBRI finds that 44 percent of enrollees are relatively new. Both Devenir and EBRI find that a significant percentage of accounts were unfunded, and EBRI found that the percentage of HSAs not receiving any contributions appears to be trending up. The number of HSAs may include people who have disenrolled from an HSA-eligible health plan and, as a result, is not a good proxy to measure trends in HSA-eligible health plan enrollment.

Accurately measuring growth in HSA enrollment is important as employers, the industry, and policymakers endeavor to understand the aspects of HSA-eligible health plans that may be contributing to growth of HSAs—or lack thereof.
The EBRI report, “Enrollment in HSA-Eligible Health Plans: Slow and Steady Growth Continued into 2018” is published as the March 2019 *EBRI Issue Brief*, and is available online [here](http://twitter.com/EBRI) or [here](https://ebriorg.wordpress.com/).

The Employee Benefit Research Institute is a private, nonpartisan, nonprofit research institute based in Washington, DC, that focuses on health, savings, retirement, and economic security issues. EBRI does not lobby and does not take policy positions. The work of EBRI is made possible by funding from its members and sponsors, which include a broad range of public, private, for-profit and nonprofit organizations. For more information go to [www.ebri.org](http://www.ebri.org) or connect with us on [Twitter](http://twitter.com/EBRI) or [LinkedIn](http://www.linkedin.com).

###