

ICHRA Ecosystem SOW Template

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SOW template instructions

Use this as a read-only starting structure for an external statement of work. Complete and approve the final SOW outside the toolkit.

- Identify parties, roles, dependencies, and exclusions.
- Separate lead, support, review, informed, and excluded responsibilities.
- Attach evidence expectations, review routes, and decision rights.
- Do not use this file as a substitute for legal, tax, payroll, privacy, or compliance review.

Role coding

Code	Meaning	Use carefully
A	Accountable / final approver	Name the external approver and approval evidence.
L	Lead / primary lane	Coordinates the function but does not assume unlisted duties.
S	Support / contributor	Provides inputs or support as scoped.
R	Review / approve	Reviews specialized questions before use.
I	Informed	Receives information; does not own the function.
E	Excluded / not in scope	Not included unless separately documented.

SOW sections to complete externally

- Parties and baseline assumptions.
- Governance model and decision rights.
- Meeting cadence and escalation standard.
- Duty path workstreams.

- Notices, forms, evidence, and reporting matrix.
- Data, systems, privacy, and security terms.
- Vendor scope, dependencies, exclusions, and signatures.
- Appendices for source references, role map, timeline, and evidence index.

Checklist

- You need a read-only SOW structure for external review and documentation.

Decision questions

- Who can approve plan design, contribution, class, vendor, privacy, notice, and employee-facing language decisions?
- Which services are expressly excluded?
- What evidence must be retained for each duty path?
- Which questions must route to qualified review before reliance?

Review triggers

- Contract language, legal conclusions, tax conclusions, or scope commitments that require qualified review.

Evidence examples

- Final external SOW
- Approval record
- Reviewer notes

Template

SOW placeholder language:

[Employer/Plan Sponsor] and [Service Partner] agree to use this SOW to identify HRB operating responsibilities, review routes, evidence expectations, and excluded services. Final obligations are controlled by the executed agreement, plan documents, applicable law, and qualified professional review.

Reminder

This toolkit provides educational and operating-model resources. It does not assign responsibility, manage implementation tasks, replace plan documents, or provide legal, tax, payroll, Medicare, carrier, or individualized benefits advice.

ICHRA Ecosystem Scope of Work Template

Roles, responsibilities, service boundaries, and implementation governance for the employer's ICHRA ecosystem.

How to Use This SOW

Use as a practical operating document, not a plan document or legal opinion. Identify ecosystem parties, define service boundaries, and attach evidence.

Purpose and Operating Philosophy

Define roles, service boundaries, handoffs, escalation paths, and evidence requirements so critical tasks are not assumed.

Role Coding and Responsibility Types

Use Lead, Support, Review, Informed, and Excluded language to clarify external scope records without creating live assignment tracking.

Parties, Scope, and Baseline Assumptions

Document employer, HR, finance, counsel, brokers, administrator, enrollment support, payment support, compliance support, payroll, continuation support, carrier or issuer, and employee-facing support lanes.

Governance Model and Decision Rights

Name who can approve plan design, contribution levels, class structure, vendor scope, privacy terms, payroll treatment, notice delivery, and employee-facing language.

Escalation Standard

Coverage-risk, payment-risk, privacy, notice-deadline, payroll, continuation, claims, Medicare, Marketplace, or state-specific questions should be escalated to the assigned qualified reviewer or vendor lane.

Strategy & Plan Design

Coordinate feasibility, market review, contribution modeling, class design, affordability assumptions, plan-year timing, and employer approvals.

Finance & Funding

Document funding controls, payment setup, premium support, payroll coordination, reconciliation, discrepancies, and failed payment escalation.

Operations & Implementation

Organize census intake, eligibility validation, employee classes, new hire process, termination/offboarding, QLE/SEP routing, support pathways, and launch readiness.

Compliance & Governance

Coordinate plan documents, SPD/SMM/SAR resources, ICHRA/QSEHRA notices, continuation rights, privacy, reporting support, claims/appeals, and audit evidence.

Employee Experience

Create support maps, education resources, FAQ cards, plan shopping instructions, enrollment support, reimbursement guidance, payment support, and escalation paths.

Notices, Forms, Evidence, and Reporting Matrix

Retain final versions, recipient lists, delivery logs, approval records, source references, and reviewer notes where applicable.

Data, Systems, Privacy, and Security

Maintain data maps, secure portals, access controls, BAA or no-BAA determinations, privacy contacts, and incident escalation references.

Exclusions, Dependencies, and Disclaimers

Exclude legal, tax, payroll, fiduciary, continuation, privacy, claims, Medicare, Marketplace, and state-specific advice unless separately engaged and permitted by law.

Acknowledgment and Signatures

Collect external sign-off for roles, service boundaries, decision rights, evidence ownership, and escalation paths.

Meeting cadence

- Kickoff: confirm parties, source materials, and decision rights.
 - Implementation check-ins: review open assumptions, handoffs, evidence, and review-sensitive questions.
 - Launch readiness: confirm notices, support paths, payment, reimbursement, and escalation routes.
 - Post-launch review: retain final evidence, exceptions, and renewal notes.
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Timeline and appendices

- Appendix A: role and responsibility map.
- Appendix B: vendor scope scorecard.
- Appendix C: notices and evidence matrix.
- Appendix D: source reference index.
- Appendix E: renewal and review reminders.

Educational disclaimer

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