






# ICHRA ECOSYSTEM: ROLES AND RESPONSIBILITIES

A coordinated ecosystem delivers choice, compliance, and value while creating clear expectations across all parties.

## Overview

An ICHRA is not a single product. It is an ecosystem of choice, compliance, funding, technology, and human support. Success depends on clear role definition, coordinated execution, and knowing who owns each task. Every employer's structure will look different. Some internal teams may cover multiple roles, and some vendor solutions may bundle several functions. When one vendor performs multiple functions, employers should still confirm which legal, operational, financial, and employee-support responsibilities are included, excluded, or shared. The goal is not to force one model, but to make responsibilities clear before the plan is launched and ensure all tasks are assigned and owned.

	EMPLOYER AND INTERNAL STAKEHOLDERS					BROKERS & VENDORS				
	EMPLOYER (ER) (Plan Sponsor / Fiduciary)	EMPLOYER HR	FINANCE (FIN)	LEGAL (L)	EMPLOYEE (EE)	Employer Sponsored Plan (ESP) BROKER (Employer-Side Broker)	Individual and Family Plan (IFP) BROKER (Employee-Side Broker)	ENROLLMENT & ILLUSTRATIONS VENDOR (EIV)	PAYMENTS VENDOR (PV)	ACA / ERISA COMPLIANCE VENDOR (CV)
 <b>1. STRATEGY &amp; PLAN DESIGN</b> • Design the ICHRA strategy and plan structure.	<ul style="list-style-type: none"> <li>Determine ICHRA viability</li> <li>Authorize defined contributions and budget</li> <li>Authorize defined EE classes</li> <li>Authorize finalized plan design</li> </ul>	<ul style="list-style-type: none"> <li>Provide workforce insights</li> <li>Provide census, ER data, prior plan docs</li> <li>Support ER class definitions</li> <li>Track EE feedback review with ER/ESP</li> </ul>	<ul style="list-style-type: none"> <li>Budget modeling and financial planning</li> <li>Evaluate affordability impact</li> </ul>	<ul style="list-style-type: none"> <li>Review plan structure</li> <li>Provide regulatory/legislative interpretation</li> </ul>	<ul style="list-style-type: none"> <li>Provide HR needs and preferences feedback</li> </ul>	<ul style="list-style-type: none"> <li>Lead strategy and consulting</li> <li>Model, optimize, advise on, and present plan level contributions and classes</li> <li>Present compliance models</li> <li>Align with labor market</li> </ul>	<ul style="list-style-type: none"> <li>Provide market insights</li> <li>Inform plan design based on consumer realities</li> </ul>	<ul style="list-style-type: none"> <li>Maintain current rate data</li> <li>Provide plan modeling and illustrations</li> <li>Support scenario comparisons</li> <li>Automate notice to ESP of annual rate data changes</li> </ul>	—	<ul style="list-style-type: none"> <li>Model plan illustration compliance tests for Affordability, NDX, ALE</li> <li>Provide model outcome to ESP/HR/ER</li> </ul>
 <b>2. FINANCE &amp; FUNDING</b> • Manage funding • Reimbursements • Financial oversight.	<ul style="list-style-type: none"> <li>Own overall budget and funding</li> <li>Approve reimbursement structure</li> <li>Complete ACH forms and submit to ESP/PV</li> <li>Oversee financial reporting</li> </ul>	—	<ul style="list-style-type: none"> <li>Lead payment oversight</li> <li>Oversee payroll</li> <li>Ensure ACH/payment setup is completed</li> <li>Track and reconcile reimbursements</li> </ul>	<ul style="list-style-type: none"> <li>Review funding and tax treatment considerations</li> </ul>	<ul style="list-style-type: none"> <li>Submit reimbursement requests</li> <li>Maintain premium payment/autopay setup when employee action is required</li> <li>Notify HR/IFP of payment error notices or coverage risk</li> </ul>	<ul style="list-style-type: none"> <li>Advise on financial strategy and sustainability</li> <li>Ensure strategy aligns with real-world pricing</li> </ul>	<ul style="list-style-type: none"> <li>Provide affordability feedback from the EE perspective</li> </ul>	<ul style="list-style-type: none"> <li>Automate notice to ESP, FIN, PV, CV of any mid-year rate changes</li> </ul>	<ul style="list-style-type: none"> <li>Generate Unique EE Payment Accounts</li> <li>Manage funding flows and reimburse errors</li> <li>Payroll integration</li> <li>Financial reporting and automated discrepancy notices to HR/FIN</li> </ul>	<ul style="list-style-type: none"> <li>Ensure reimbursement structure aligns with regulations</li> </ul>
 <b>3. OPERATIONS &amp; IMPLEMENTATION</b> • Execute the plan and manage day-to-day operations.	<ul style="list-style-type: none"> <li>Select and manage vendors</li> <li>Sign vendor contracts</li> <li>Oversee eligibility framework</li> <li>Ensure alignment across teams</li> </ul>	<ul style="list-style-type: none"> <li>Lead Ops</li> <li>Notify IFP of new hire, terminations, QLEs/SEPs</li> <li>Maintain ER records</li> <li>Maintain EE records (add individuals, update QLEs, eligibility, employment status, class placements)</li> </ul>	<ul style="list-style-type: none"> <li>Coordinate with payments vendor</li> <li>Support financial workflows</li> </ul>	—	<ul style="list-style-type: none"> <li>Provide required documentation</li> <li>Complete enrollment selections</li> </ul>	<ul style="list-style-type: none"> <li>Design ecosystem and workflows</li> <li>Coordinate across vendors and stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Guide EEs through plan shopping</li> <li>Assist with enrollment and eligibility nuances</li> </ul>	<ul style="list-style-type: none"> <li>Provide enrollment platform and tools</li> <li>Enable plan shopping and comparison</li> <li>Execute enrollment workflows</li> <li>Collect documentation</li> </ul>	<ul style="list-style-type: none"> <li>Execute reimbursement workflows</li> <li>Coordinate with payroll and finance systems</li> <li>Support collection of reimbursement substantiation</li> </ul>	<ul style="list-style-type: none"> <li>Support eligibility tracking and validation</li> <li>Assist with documentation requirements</li> <li>Store EE compliance records</li> </ul>
 <b>4. COMPLIANCE &amp; GOVERNANCE</b> • Ensure regulatory compliance and reduce risk.	<ul style="list-style-type: none"> <li>Maintain fiduciary responsibility</li> <li>Approve enrollment process flows</li> <li>Ensure HIPAA and privacy compliance</li> <li>Oversee IRS reporting and audit readiness</li> </ul>	<ul style="list-style-type: none"> <li>Support document collection</li> <li>Manage business continuity plan</li> <li>Manage offboarding COBRA flows</li> </ul>	<ul style="list-style-type: none"> <li>Support reporting and audit processes</li> <li>Ensure accurate financial records</li> </ul>	<ul style="list-style-type: none"> <li>Review applicable plan documents, notices, summary materials, forms, and employee-facing compliance communications</li> <li>Ensure HIPAA, Section 125, and tax compliance</li> <li>Support legal risk mitigation</li> </ul>	<ul style="list-style-type: none"> <li>Provide accurate information</li> <li>Complete required attestations</li> </ul>	<ul style="list-style-type: none"> <li>Identify compliance risks early</li> <li>Interpret regulations</li> <li>Ensure alignment with compliance execution</li> </ul>	<ul style="list-style-type: none"> <li>Help ensure plan choices meet ICHRA rules</li> </ul>	<ul style="list-style-type: none"> <li>Maintain compliant enrollment processes</li> <li>Data privacy and security</li> </ul>	<ul style="list-style-type: none"> <li>Validate reimbursement eligibility before releasing funds.</li> <li>Comply with financial regulations</li> <li>Secure handling of funds</li> <li>Aggregate data for 1094/1095/5500 filing</li> </ul>	<ul style="list-style-type: none"> <li>Lead affordability testing</li> <li>Support IRS reporting</li> <li>Monitor regulatory and legislative changes across federal and applicable states</li> <li>Audit readiness</li> </ul>
 <b>5. EMPLOYEE EXPERIENCE</b> • Support and guide employees throughout their journey.	<ul style="list-style-type: none"> <li>Approve communication strategy</li> <li>Define and approve escalation lanes</li> <li>Support escalation paths for issues</li> </ul>	<ul style="list-style-type: none"> <li>First point of contact for EE service questions</li> <li>Draft communication strategy, distribute plan docs and notices</li> <li>Manage OEP follow ups with EE</li> </ul>	<ul style="list-style-type: none"> <li>Track payment discrepancies and alert EE</li> <li>Escalate payment anomalies to ER/ESP</li> </ul>	—	<ul style="list-style-type: none"> <li>Engage in plan selection</li> <li>Use guidance and tools</li> <li>Submit reimbursement documents</li> <li>Report life changes</li> </ul>	<ul style="list-style-type: none"> <li>Support high-level communications</li> <li>Assist in escalations and edge cases</li> </ul>	<ul style="list-style-type: none"> <li>Primary enrollment advisor to EEs</li> <li>Plan recommendations</li> <li>Enrollment assistance</li> <li>Life events and ongoing support</li> </ul>	<ul style="list-style-type: none"> <li>Provide user experience for plan selection</li> <li>Offer basic enrollment guidance</li> <li>Support document collection</li> </ul>	<ul style="list-style-type: none"> <li>Provide payment visibility</li> <li>Support payment-related inquiries</li> </ul>	—
<b>Key Focus</b> Primary focus of this role in ICHRA success	Set strategy, own risk, ensure oversight and alignment across the ecosystem	Drive employee engagement and data accuracy	Manage funding, payroll integration, and financial accountability	Ensure legal compliance and mitigate regulatory risk	Make informed choices and participate in the coverage experience	Strategic advisor to the employer  Architect of the ICHRA solution and ecosystem	Front-line advisor to EEs  Guide decisions and solve issues	Enable plan shopping and enrollment through technology and tools	Process reimbursements, payment flows, and related reporting accurately and securely	Ensure regulatory compliance and reporting accuracy