Do Orthodontic Services Have to Have Been Incurred to Be Eligible for Reimbursement from a Medical FSA?

No, they do not. Orthodontic expenses are reimbursed when actual payments have been made, even if the services have not yet been rendered. Orthodontic expenses typically are payable to the orthodontist at the onset of treatment or through an installment-based treatment plan. This is an exception to the general rule that pertains to Medical FSAs.

The Orthodontic contract should be submitted with initial claim to show treatment plan.

Note: Reimbursement for Orthodontia is to be made from the plan year in which the payment was made. Example: If a plan year that runs 1/1/2025-12/31/2025, payment made in December 2025 will be reimbursed from the 2025 plan year. Payments made in January 2026 will be reimbursed from the 2026 plan year.

