

# CLIENT ALERTS

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## IRS Announces Employee Benefits Limits for 2020

11.8.2019

The Internal Revenue Service has recently announced cost-of-living adjustments applicable to dollar limitations for retirement plans (and other items) for 2020. Many of the retirement plan limitations will change for 2020 because the increase in the cost-of-living index met the statutory thresholds that trigger their adjustment. However, other limitations will remain unchanged because the increase in the index did not meet the statutory thresholds that trigger their adjustment.

### **I. Retirement Plans**

Some of the annual limits for 2020 (and the current limits for 2019) are as follows:

#### **2020**

#### **2019**

Elective Deferral Limit (for Internal Revenue Code (“Code”) Section 401(k), 403(b), 457(b)(2), 457(c), and SARSEP plans) – excluding catch-up contributions

**\$19,500**

**\$19,000**

Elective Deferral Limit for SIMPLE plans

**\$13,500**

**\$13,000**

### **Related Services**

Employee Benefits

## CLIENT ALERTS

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Catch-up Contribution Limit for Code Section 401(k), 403(b), 457(b) and SARSEP plans

**\$6,500**

**\$6,000**

Catch-up Contribution Limit for SIMPLE plans

**\$3,000**

**\$3,000**

Annual limitation for *defined contribution* plans under Code Section 415

**\$57,000**

**\$56,000**

Annual limitation for *defined benefit* plans under Code Section 415

**\$230,000**

**\$225,000**

Maximum compensation limit

**\$285,000**

**\$280,000**

Minimum dollar threshold to be considered highly compensated employee ("HCE") based on compensation

**\$130,000[1]**

**\$125,000**

Minimum dollar threshold for an officer of the employer to be considered a key employee for top heavy plans.

**\$185,000**

**\$180,000**

## CLIENT ALERTS

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Maximum Social Security taxable earnings (OASDI only)

**\$137,700**

**\$132,900**

Maximum Medicare taxable earnings (HI only)

**No Limit[2]**

**No Limit**

Minimum compensation amount to be eligible for coverage under SEP

**\$600**

**\$600**

### **II. Health Savings Accounts (HSAs)**

The new annual HSA (and High Deductible Health Plan (HDHP)) limits for 2020 (and the current limits for 2019) are as follows:

**2020**

**2019**

HSA Contribution Limits:

Self-only

**\$3,550**

**\$3,500**

Family

**\$7,100**

## CLIENT ALERTS

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**\$7,000**

Catch-up (for individuals age 55 or older)

**\$1,000**

**\$1,000**

HDHP Minimum Deductible:

Self-only

**\$1,400**

**\$1,350**

Family

**\$2,800**

**\$2,700**

HDHP Out-of-Pocket Expense Limit (Deductibles,  
co-payments and other amounts, but not premiums) [3]:

Self-only

## CLIENT ALERTS

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**\$6,900**

**\$6,750**

Family

**\$13,800**

**\$13,500**

### **III. Health Flexible Spending Accounts**

The annual limit for 2020 for a health flexible spending account is increased to \$2,750. Presently, for 2019, the limit is \$2,700.

Plan documents (particularly retirement plan documents) often anticipate cost of living adjustments and do not have to be amended for these adjustments. Nevertheless, administrators of plans should review their documents to reconfirm the documents automatically incorporate the adjustments. If the documents do not contemplate the adjustments, plan documents will need to be amended to remain tax-compliant. Plan administrators should also communicate with their plan service providers (including payroll providers) to ensure the new limits will be used in plan operations beginning in 2020.

If you have questions regarding the Internal Revenue Service limits or other employee benefits matters, please contact your regular Butzel Long attorney, a member of the Butzel Long Employee Benefits Practice Group, or the author of this e-mail news alert.

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[1] The \$130,000 limit is used to determine who is a HCE in 2021. The \$125,000 limit for 2019 is used to determine who is a HCE for 2020.

[2] The Medicare tax rate is 1.45% on wages (for employees) and 2.90% on self-employment income (for self-employed individuals). However, the Patient Protection and Affordable Care Act imposes an additional .9% Medicare tax on wages and self-employment income for tax years beginning after December 31, 2012. The additional tax applies to individuals with compensation in excess of certain threshold amounts (\$200,000 for single taxpayers, \$250,000 for married taxpayers filing a joint return, and \$125,000 for married couples filing separate returns). The Medicare tax rate on wages and self-employment income in excess of the threshold amounts is 2.35% for employees and 3.8% for self-employed individuals.

## CLIENT ALERTS

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[3] The HDHP out of pocket maximums for HSA/HDHP plans are lower than the Patient Protection and Affordable Care Act (“ACA”) out of pocket maximums. For 2020, the ACA’s out of pocket maximum is \$8,150 for self-only coverage and \$16,300 for family coverage. Employers offering HSA/HDHP plans will need to ensure they satisfy the lower Internal Revenue Service HDHP out of pocket maximums.