

IRS Announces Employee Benefits Limits for 2019

The Internal Revenue Service has recently announced cost-of-living adjustments applicable to dollar limitations for retirement plans (and other items) for 2019. Many of the retirement plan limitations will change for 2019 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 2019 (and the current limits for 2018) are as follows:

	<u>2019</u>	<u>2018</u>
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	\$19,000	\$18,500
Elective Deferral Limit for SIMPLE plans	\$13,000	\$12,500
Catch-up Contribution Limit for Code Section 401(k), 403(b), 457(b) and SARSEP plans	\$6,000	\$6,000
Catch-up Contribution Limit for SIMPLE plans	\$3,000	\$3,000
Annual limitation for <i>defined contribution</i> plans under Code Section 415	\$56,000	\$55,000
Annual limitation for <i>defined benefit</i> plans under Code Section 415	\$225,000	\$220,000
Maximum compensation limit	\$280,000	\$275,000
Minimum dollar threshold to be considered highly compensated employee (“HCE”) based on compensation	\$125,000¹	\$120,000
Minimum dollar threshold for an officer of the employer to be considered a key employee for top heavy plans.	\$180,000	\$175,000
Maximum Social Security taxable earnings (OASDI only)	\$132,000	\$128,400
Maximum Medicare taxable earnings (HI only)	No Limit²	No Limit
Minimum compensation amount to be eligible for coverage under SEP	\$600	\$600

¹ The \$125,000 limit is used to determine who is a HCE in 2020. The \$120,000 limit for 2018 is used to determine who is a HCE for 2019.

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.

II. Health Savings Accounts (HSAs)

The new annual HSA (and High Deductible Health Plan (HDHP)) limits for 2019 (and the current limits for 2018) are as follows:

	<u>2019</u>	<u>2018</u>
HSA Contribution Limits:		
Self-only	\$3,500	\$3,450
Family	\$7,000	\$6,850
Catch-up (for individuals age 55 or older)	\$1,000	\$1,000
HDHP Minimum Deductible:		
Self-only	\$1,350	\$1,350
Family	\$2,700	\$2,700
HDHP Out-of-Pocket Expense Limit (Deductibles, co-payments and other amounts, but not premiums) ³ :		
Self-only	\$6,750	\$6,650
Family	\$13,500	\$13,300

III. Health Flexible Spending Accounts

The annual limit for 2019 for a health flexible spending account has not yet been announced. Presently, for 2018, the limit is \$2,650.

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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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 2019, the ACA's out of pocket maximum is \$7,900 for self-only coverage and \$15,800 for family coverage. Employers offering HSA/HDHP plans will need to ensure they satisfy the lower Internal Revenue Service HDHP out of pocket maximums.