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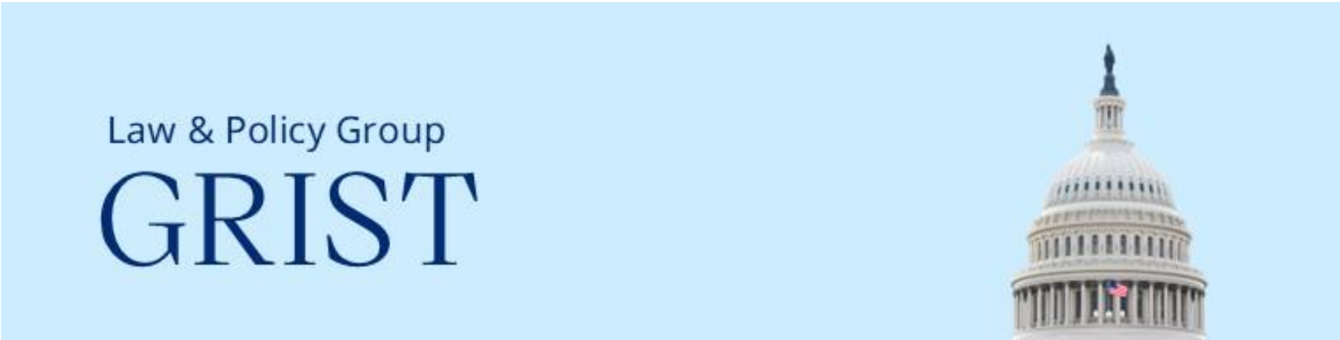

Summary of 2026 benefit-related cost-of-living adjustments

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In this article
Retirement plan limits | Health and fringe benefit limits | Medicare premiums, coinsurance, deductibles, and Rx subsidy | Social Security and SSI amounts | Related resources

The IRS, Pension Benefit Guaranty Corp. (PBGC), Social Security Administration (SSA), and Centers for Medicare & Medicaid Services (CMS) have issued 2026 cost-of-living adjustments (COLAs) for retirement, health, and fringe benefit plans; Medicare; and Social Security and Supplemental Security Income (SSI). This GRIST covers the key 2026 COLAs for benefit plans issued in the fall of 2025, as well as these recently published items: covered compensation figures, limits for retirement plans qualified in Puerto Rico, and the play-or-pay monthly contribution limit for noncalendar-year health plans using an affordability safe harbor based on the federal poverty line (FPL) guidelines.

Retirement plan limits

Employer-sponsored retirement plans may be affected by annual changes to US and PR qualified plan limits; covered compensation, which is used in safe-harbor plan designs and nondiscrimination testing; and PBGC premiums, guaranteed benefits, and maximum present value. Other retirement-related COLAs may affect employees who are eligible for the saver's credit or have individual retirement accounts (IRAs), including traditional and Roth IRAs.

US qualified retirement plan limits

IRS Notice 2025-67 provides 2026 limits for qualified retirement plans, including defined benefit (DB), defined contribution (DC), and simplified employee pension (SEP) plans, along with employee stock ownership plans (ESOPs) and savings incentive match plans for small employers (SIMPLE plans). Most of the limits have risen, reflecting the 2.88% increase in the third-quarter Consumer Price Index for All Urban Consumers (CPI-U) from 2024 to 2025.

The following table shows the qualified retirement plan limits for 2024, 2025, and 2026, reflecting the rounding rules in the Internal Revenue Code (IRC), along with unrounded 2026 values — calculated by Mercer — to facilitate projections.

IRC retirement plan limit	2026 (not rounded)	2026	2025	2024
Treas. Reg. § 1.401(a)(9)-6 limit on premiums paid for a qualified longevity annuity contract	$218,580	$210,000	$210,000	$200,000
401(k), 403(b) and eligible 457 plan elective deferrals (and designated Roth contributions)	24,683	24,500	23,500	23,000
414(v)(2)(B)(i) catch-up contributions to plans other than SIMPLE plans (age ≥ 50)				
For employees ages 60-63	11,574	11,250	11,250	7,500
For all other employees age ≥ 50	8,228	8,000	7,500	7,500
408(p)(2)(E) SIMPLE plan elective deferrals				
For large employers	17,086	17,000	16,500	16,000
For small employers and other electing eligible employers	18,580	18,100	17,600	17,600
414(v)(2)(B)(ii) SIMPLE plan catch-up contributions (age ≥ 50)				
For employees ages 60-63	5,401	5,250	5,250	3,500
For all other employees age ≥ 50	4,114	4,000	3,500	3,500
414(v)(7)(A) FICA wage threshold for Roth catch-up mandate*	153,077	150,000	145,000	N/A
408(k)(2)(C) SEP plan minimum compensation	820	800	750	750

IRC retirement plan limit	2026 (not rounded)	2026	2025	2024
415(b) DB plan maximum annuity	$291,568	$290,000	$280,000	$275,000
415(c) DC plan maximum annual addition	72,892	72,000	70,000	69,000
401(a)(17) and 408(k)(3)(C) compensation	364,460	360,000	350,000	345,000
401(a)(17) compensation for eligible participants in certain governmental plans in effect July 1, 1993	538,400	535,000	520,000	505,000
414(q)(1)(B) highly compensated employee (HCE) and 414(q)(1)(C) top-paid group†	164,680	160,000	160,000	155,000
416(i)(1)(A)(i) officer compensation for top-heavy plan key employee definition	236,899	235,000	230,000	220,000
Treas. Reg. § 1.61-21(f)(5) control employee for fringe benefit valuations				
Officer compensation	146,670	145,000	140,000	135,000
Employee compensation	293,340	290,000	285,000	275,000
409(o)(1)(C) tax-credit ESOP limits for lengthening the distribution period				
Five-year maximum balance	1,457,840	1,455,000	1,415,000	1,380,000
One-year extension	291,568	290,000	280,000	275,000
432(e)(9)(H)(v) systemically important multiemployer plan (billions)	1.505 B	1.505 B	1.441 B	1.369 B
664(g)(7) qualified gratuitous transfer of employer securities to an ESOP	66,669	65,000	60,000	60,000

* Employees are subject to the Roth catch-up limit in 2026 if their 2025 FICA wages exceeded $150,000.

† The HCE limit shown for a year is applied to compensation for that plan year to determine if an employee is an HCE for the following plan year, e.g., an employee with 2026 plan year compensation greater than $160,000 may be an HCE for the 2027 plan year.

Puerto Rico qualified retirement plan limits

Carta Circular de Rentas Internas 26-03 announced 2026 limits for PR-only plans and dual-qualified plans. The PR tax code aligns its annual limits for compensation, contributions, and benefits with the US qualified plan limits. Pretax elective deferral limits for PR-only plans and catch-up contribution limits for both PR-only and dual-qualified plans are lower than the parallel US limits and aren't indexed for inflation after 2013 (2012 for catch-up contributions). Puerto Rican participants' elective deferrals (excluding catchups) to dual-qualified plans, when added to deductible IRA contributions, may not exceed the sum of the elective deferral limit for PR-only plans plus the contribution limit for PR IRAs. The following table shows the annual limits for PR-only and dual-qualified plans but doesn't address Puerto Rican employees of the US government.

PR Code retirement plan limit	2026	2025	2024
1081.01(d)(7)(A)(i) elective deferral — PR-only plans[1]	$15,000	$15,000	$15,000
1081.01(d)(7)(A)(ii) elective deferral — dual-qualified plans[2]	24,500	23,500	23,000
1081.01(d)(7)(A)(iii) combined limit on elective deferrals (other than catch-up contributions) to dual-qualified plans and deductible IRA contributions[3]	22,500	20,000	20,000
1081.01(d)(7)(C)(i) catch-up contributions to both PR-only and dual-qualified plans[1]	1,500	1,500	1,500
1081.01(a)(12) annual compensation limit	360,000	350,000	345,000
1081.01(a)(11)(A)(i) DB maximum annuity	290,000	280,000	275,000
1081.01(a)(11)(B)(i) DC maximum annual addition[4]	72,000	70,000	69,000
1081.01(d)(3)(E)(iii)(IV) HCE threshold[5]	160,000	160,000	155,000

[1] Limit is set by statute and is not indexed for inflation.

[2] Participants aged 75 or older may be subject to a $15,000 limit because their IRA limit is zero.

[3] Legislation signed in 2025 aligned the contribution limit for PR IRAs with the IRA limit under the IRC, so starting in 2026 the combined limit will increase by the same amount as the IRA limit for US plans. Prior to 2026, the limit was not indexed for inflation.

[4] The 1081.01(a)(15) cumulative cap on after-tax contributions is 10% of aggregate pay while participating.

[5] The HCE limit shown for a year is applied to compensation for that plan year to determine if an employee is an HCE for the following plan year, e.g., an employee with 2026 plan year compensation greater than $160,000 may be an HCE for the 2027 plan year.

Covered compensation

Qualified DB pension plans use covered compensation to determine "permitted disparity" under Section 401(l) design-based safe harbor rules and "imputed disparity" under Section 401(a)(4) general nondiscrimination testing rules. Covered compensation is the average Old Age, Survivors, and Disability Insurance (OASDI) contribution and benefit base for the 35 years ending with the year the employee reaches Social Security retirement age. IRS rounds Social Security retirement ages up to the next higher integer for covered compensation purposes, even though the actual Social Security full retirement age increases in two-month increments. Qualified plans have the option to determine permitted or imputed disparity using either actual or rounded covered compensation.

Revenue Ruling 2026-01 contains the 2026 covered compensation tables, which reflect the increase in the taxable wage base to $184,500 for 2026 from $176,100 for 2025. The next table shows covered compensation amounts for individuals who have already reached Social Security full retirement age. (At that age, covered compensation becomes fixed and is no longer affected by annual changes in the OASDI contribution and benefit base.)

Year born	Social Security full retirement		Covered compensation	
	Age	Year	Not rounded	Rounded
1920	65	1985	$12,276	$12,000
1921	65	1986	13,368	12,000
1922	65	1987	14,520	15,000
1923	65	1988	15,708	15,000
1924	65	1989	16,968	18,000
1925	65	1990	18,312	18,000
1926	65	1991	19,728	21,000
1927	65	1992	21,192	21,000
1928	65	1993	22,716	24,000
1929	65	1994	24,312	24,000
1930	65	1995	25,920	27,000
1931	65	1996	27,576	27,000
1932	65	1997	29,304	30,000

Year born	Social Security full retirement		Covered compensation	
	Age	Year	Not rounded	Rounded
1933	65	1998	$31,128	$30,000
1934	65	1999	33,060	33,000
1935	65	2000	35,100	36,000
1936	65	2001	37,212	36,000
1937	65	2002	39,444	39,000
1938	65 and 2 months	2004	43,992	45,000
1939	65 and 4 months	2005	46,344	45,000
1940	65 and 6 months	2006	48,816	48,000
1941	65 and 8 months	2007	51,348	51,000
1942	65 and 10 months	2008	53,952	54,000
1943	66	2009	56,628	57,000
1944	66	2010	59,268	60,000
1945	66	2011	61,884	63,000
1946	66	2012	64,560	66,000
1947	66	2013	67,308	66,000
1948	66	2014	69,996	69,000
1949	66	2015	72,636	72,000
1950	66	2016	75,180	75,000
1951	66	2017	77,880	78,000
1952	66	2018	80,532	81,000
1953	66	2019	83,244	84,000
1954	66	2020	86,052	87,000
1955	66 and 2 months	2022	91,884	93,000
1956	66 and 4 months	2023	95,172	96,000
1957	66 and 6 months	2024	98,616	99,000

Year born	Social Security full retirement		Covered compensation	
	Age	Year	Not rounded	Rounded
1958	66 and 8 months	2025	$102,180	$102,000
1959	66 and 10 months	2026	105,924	105,000

This table shows the 2026 amounts for individuals below Social Security full retirement age, along with 2025 amounts.

Year born	Social Security full retirement		Covered compensation			
			Not rounded		Rounded	
	Age	Year	2026	2025	2026	2025
1960	67	2027	$109,620	$109,140	$111,000	$108,000
1961	67	2028	113,244	112,524	114,000	114,000
1962	67	2029	116,784	115,824	117,000	117,000
1963	67	2030	120,300	119,100	120,000	120,000
1964	67	2031	123,780	122,340	123,000	123,000
1965	67	2032	127,188	125,508	126,000	126,000
1966	67	2033	130,500	128,580	132,000	129,000
1967	67	2034	133,704	131,544	135,000	132,000
1968	67	2035	136,800	134,400	138,000	135,000
1969	67	2036	139,764	137,124	141,000	138,000
1970	67	2037	142,620	139,740	144,000	141,000
1971	67	2038	145,404	142,284	144,000	141,000
1972	67	2039	148,164	144,804	147,000	144,000
1973	67	2040	150,864	147,264	150,000	147,000
1974	67	2041	153,444	149,604	153,000	150,000
1975	67	2042	155,928	151,848	156,000	153,000
1976	67	2043	158,280	153,960	159,000	153,000

Year born	Social Security full retirement		Covered compensation			
			Not rounded		Rounded	
	Age	Year	2026	2025	2026	2025
1977	67	2044	$160,500	$155,940	$162,000	$156,000
1978	67	2045	162,720	157,920	162,000	159,000
1979	67	2046	164,940	159,900	165,000	159,000
1980	67	2047	167,064	161,784	168,000	162,000
1981	67	2048	169,092	163,572	168,000	165,000
1982	67	2049	171,024	165,264	171,000	165,000
1983	67	2050	172,908	166,908	174,000	168,000
1984	67	2051	174,792	168,552	174,000	168,000
1985	67	2052	176,424	169,944	177,000	171,000
1986	67	2053	178,032	171,312	177,000	171,000
1987	67	2054	179,508	172,548	180,000	174,000
1988	67	2055	180,840	173,640	180,000	174,000
1989	67	2056	182,040	174,600	183,000	174,000
1990	67	2057	183,108	175,428	183,000	176,100
1991	67	2058	183,804	175,884	184,500	176,100
1992	67	2059	184,260	176,100	184,500	176,100
1993	67	2060+	184,500		184,500	

PBGC premiums, guaranteed benefits, maximum present value, and expense loads

On October 27, 2025, PBGC announced inflation-adjusted 2026 premium rates and the variable-rate premium cap. With the exception of the variable rate premium, all premium amounts — including the per-participant variable-rate premium cap — are indexed annually for wage inflation.

On October 30, 2025, PBGC announced that the maximum guaranteed benefit at age 65 for terminating plans will rise to $93,477 in 2026 from $89,181 in 2025. This amount is determined using the Social Security "old law" contribution and benefit base (see Social Security and SSI amounts). The maximum guaranteed benefit is adjusted if benefit payments start before (or after) age 65 or are paid in a form other than a single-life annuity. Some of the guaranteed amount may be paid from the plan's assets, and participants may receive more if the plan is better funded or if PBGC can recover other amounts from the plan sponsor.

PBGC amount	2026	2025	2024
Flat-rate premium — single-employer plans	$111	$106	$101
Flat-rate premium — multiemployer plans	40	39	37
Variable-rate premium per $1,000 of unfunded vested benefits*	52	52	52
Per-participant variable-rate premium cap	751	717	686
Annual maximum guaranteed benefit (payable as a single-life annuity starting at age 65)	93,477	89,181	85,295

*Not indexed after 2023

On November 10, 2025, PBGC published the 2026 present value of the maximum guarantee table. These values are used to administer Internal Revenue Code (IRC) Section 436 restrictions on lump sums and other accelerated payments from underfunded plans. Plans at least 60% but less than 80% funded may only pay lump sums (or other accelerated distributions) up to the lesser of (i) 50% of the present value of the benefit otherwise payable or (ii) the present value of the participant's PBGC maximum guarantee. Plans subject to the restrictions must use the 2026 table for annuity starting dates in 2026, regardless of the plan year.

The present values will fall from 2025 levels at younger ages but will increase at ages 62 and older. The higher age-65 maximum guaranteed benefit and the update in the Section 417(e) mortality table raised the present values by roughly 5% across the board. Offsetting this increase, the change in interest rates (August 2025 IRC Section 417(e) lump sum segment rates of 4.20%, 5.29%, and 6.08% vs. the August 2024 rates of 4.50%, 4.96%, and 5.40%) reduced present values significantly at younger ages (where the impact of the first segment rate was less) and to a much lesser extent at older ages.

The next table shows the present values for 2026 and the two prior years. [Tables]() of present values for every year back to 2008 are available on the PBGC website, along with downloadable Excel tables.

Age	Present value of PBGC maximum guarantee			Age	Present value of PBGC maximum guarantee		
	2026 [1]	2025 [2]	2024 [3]		2026 [1]	2025 [2]	2024 [3]
25	$160,350	$164,956	$152,250	56	$651,870	$674,819	$612,090
26	168,005	172,721	159,404	57	694,292	713,005	646,646
27	175,600	180,415	166,493	58	736,842	753,304	683,442
28	183,138	188,031	173,511	59	783,030	795,895	722,670
29	190,610	195,566	180,450	60	831,933	840,960	764,535
30	198,013	203,015	187,308	61	887,255	890,119	809,490
31	205,343	210,371	194,079	62	953,870	941,946	863,348
32	212,593	217,629	200,756	63	1,018,968	1,003,605	920,643
33	219,757	224,780	207,335	64	1,080,326	1,062,318	974,380
34	226,833	231,825	213,810	65	1,137,547	1,116,784	1,024,251
35	233,810	238,749	220,173	66	1,223,994	1,199,709	1,100,252
36	248,446	253,470	233,720	67	1,315,433	1,287,277	1,180,552
37	262,908	267,977	247,068	68	1,421,276	1,388,641	1,273,577
38	277,183	282,258	260,199	69	1,539,553	1,501,836	1,377,555
39	291,253	296,294	273,100	70	1,668,229	1,624,838	1,490,660
40	305,100	310,069	285,756	71	1,889,167	1,837,211	1,685,942
41	318,710	323,563	298,148	72	2,092,266	2,031,689	1,865,050
42	332,059	336,755	310,253	73	2,277,003	2,207,850	2,027,623
43	345,129	349,626	322,055	74	2,442,935	2,365,388	2,173,411
44	357,894	362,150	333,533	75	2,589,858	2,504,203	2,302,301
45	370,339	374,305	344,663	76	3,045,515	2,940,835	2,705,503
46	397,142	400,909	369,096	77	3,456,011	3,332,864	3,068,366

Age	Present value of PBGC maximum guarantee			Age	Present value of PBGC maximum guarantee		
	2026 [1]	2025 [2]	2024 [3]		2026 [1]	2025 [2]	2024 [3]
47	$423,349	$426,839	$392,894	78	$3,821,272	$3,680,458	$3,391,022
48	448,916	452,042	416,012	79	4,141,716	3,984,215	3,673,905
49	473,787	476,474	438,408	80	4,418,123	4,245,063	3,917,795
50	497,919	500,082	460,031	81	5,539,450	5,316,372	4,910,951
51	521,256	522,813	480,840	82	6,530,488	6,260,508	5,788,482
52	543,753	544,625	500,790	83	7,395,572	7,082,278	6,554,514
53	565,356	571,690	520,396	84	8,136,185	7,783,635	7,210,590
54	586,001	604,345	549,157	85	8,759,341	8,371,800	7,763,169
55	612,778	638,666	579,663				

[1] Present value determined using August 2025 lump sum segment rates of 4.20%, 5.29%, 6.08%.
[2] Present value determined using August 2024 lump sum segment rates of 4.50%, 4.96%, and 5.40%.
[3] Present value determined using August 2023 lump sum segment rates of 5.45%, 5.52%, and 5.43%.

ERISA Section 4044 expense loads are part of the assumptions used to calculate liabilities for terminating pension plans and for other purposes including valuing benefit liabilities for Section 4010 filings made by employers with significantly underfunded pension plans. PBGC's 2024 final Section 4044 regulations significantly changed the expense load calculation to better align the assumption with the private annuity market, including for the first time an inflationary component. The load is $400 per participant for the first 100 participants, plus $250 per participant for the remaining participants, adjusted for inflation. Although the new expense loads were effective for inflation for calculations with valuation dates on or after July 31, 2024, PBGC couldn't publish inflation-adjusted amounts until it slightly revised the methodology in 2025.

The table below shows the inflation adjusted amounts for calculations with a valuation date from January 31, 2026, to January 31, 2027. The expense loads are also available on PBGC's webpage. Future amounts will be announced annually after the September CPI is published in October.

	Valuation date
Section 4044 expense load	**Jan. 31, 2026–Jan. 30, 2027**
First 100 participants	$438
Remaining participants	274

Saver's credit

Notice 2025-67 provides adjusted gross income (AGI) levels at which a "saver's credit" is available for employee contributions to a qualified retirement plan or IRA. All AGI levels at which employee contributions to a qualified retirement plan or an IRA qualify for the saver's credit increased due to the 2.3% increase in the average chained CPI for the 12 months ending August 31, 2025.

Saver's credit AGI limits (IRC § 25B)	2026	2025	2024
50% saver's credit if AGI is no more than specified amount			
Married filing jointly	$48,500	$47,500	$46,000
Head of household	36,375	35,625	34,500
Other filing status	24,250	23,750	23,000
20% saver's credit if AGI exceeds limit for 50% credit but is no more than specified amount			
Married filing jointly	52,500	51,000	50,000
Head of household	39,375	38,250	37,500
Other filing status	26,250	25,500	25,000
10% saver's credit if AGI exceeds limit for 20% credit but is no more than specified amount			
Married filing jointly	80,500	79,000	76,500
Head of household	60,375	59,250	57,375
Other filing status	40,250	39,500	38,250

Traditional and Roth IRA limits

All indexed traditional and Roth IRA limits will increase for 2026, due to the 2.3% increase in the chained CPI for the 12 months ending August 31, 2025. The AGI thresholds for spouses filing separately are set to $0. The next table summarizes the 2026 IRA limits announced by IRS, along with the limits for the previous two years.

Traditional and Roth IRA limits	2026	2025	2024
Traditional IRA deduction limits (IRC §§ 219(b)(5) and 219(g)(3)(B))			
IRA maximum deductible amount	$7,500	$7,000	$7,000
IRA catch-up contribution limit (age ≥ 50)	1,100	1,000	1,000
Modified AGI threshold for determining deductible IRA contributions for active participants in qualified plans			
Married filing jointly or qualifying widow(er)	129,000	126,000	123,000
Married filing separately*	0	0	0
Single or head of household	81,000	79,000	77,000
Spouse (but not taxpayer making IRA contribution) is active participant	242,000	236,000	230,000
Roth IRA contribution limits (IRC § 408A(c)(3)(B)(ii))			
AGI for determining maximum Roth IRA contribution			
Married filing jointly or qualifying widow(er)	242,000	236,000	230,000
Married filing separately*	0	0	0
Other filing status	153,000	150,000	146,000

* Limit is not adjusted for cost-of-living changes.

Health and fringe benefit limits

Every fall, IRS updates the annual Code limits for certain health and fringe benefits, including health flexible spending arrangements (FSAs), qualified small-employer health reimbursement arrangements (QSEHRAs), qualified long-term care (LTC) policies, and qualified transportation fringe benefits and adoption assistance programs. COLAs for health savings accounts (HSAs), high-deductible health plans (HDHPs) and excepted-benefit HRAs are announced earlier in the year. Annually adjusted limits also apply to certain Affordable Care Act (ACA) cost-sharing features of nongrandfathered group health plans, employer shared-responsibility (play-or-pay) assessments, and individual eligibility for premium tax credits (PTCs). The limits on annual contributions to Trump accounts will be annually indexed for inflation starting in 2028. The annual income exclusion limits for dependent care assistance programs (DCAPs, such as dependent care flexible spending arrangements (DCFSAs)) are not adjusted for inflation but will increase from $5,000 to $7,500 ($2,500/$3,750 for married individuals filing separately) for 2026 and later tax years.

Starting in 2027, the maximum annual amount of educational assistance benefits that employers can exclude from employees' gross income will also be indexed for inflation.

Health FSA, excepted-benefit HRA, QSEHRA, and LTC limits

IRS Rev. Proc. 2025-32 gives the 2026 contribution and benefit limits for health FSAs, QSEHRAs, and qualified LTC policies. All of these limits have increased from 2025 as a result of the 2.3% increase in the average chained CPI-U for the 12 months ending August 31, 2025. The qualified LTC premium and per diem limits have also increased from 2025, reflecting the 3.1% increase in the medical care component of average chained CPI-U.

IRS Rev. Proc. 2025-19 gives the 2026 maximum employer contribution for excepted-benefit HRAs. That limit reflects the 2.5% increase in the average chained CPI-U for the 12 months ending March 31, 2025.

This table shows the 2026 adjusted amounts for health FSAs, excepted-benefit HRAs, QSEHRAs, and qualified LTC policies, along with the limits for 2025 and 2024. The health FSA carryover limits shown reflect the maximum unused funds that can carry over to the next plan year.

Health FSA, excepted-benefit HRA, QSEHRA, and LTC limits	2026	2025	2024
Health FSA limit (IRC § 125(i))			
Maximum salary reduction contribution	$3,400	$3,300	$3,200
Maximum carryover	680	660	640
Excepted-benefit HRA limit (26 CFR § 54.9831–1(c)(3)(viii)(B)(1))			
Maximum employer contribution	2,200	2,150	2,100
QSEHRA limit (IRC § 9831(d))			
Maximum annual benefit			
Self-only coverage	6,450	6,350	6,150
Family coverage	13,100	12,800	12,450

Qualified LTC policy limits (IRC § 213(d)(10) and 7702B(d)(4))			
Premium limits at age:			
40 or younger	$500	$480	$470
41–50	930	900	880
51–60	1,860	1,800	1,760
61–70	4,960	4,810	4,710
Older than 70	6,200	6,020	5,880
Per diem limit	430	420	410

Dependent care assistance programs (e.g., DCFSAs)

The 2025 reconciliation tax law known as the One Big Beautiful Bill Act (OBBBA, Pub. L. No. 119-21) permanently increased the annual income exclusion limit for DCAPs, which include employees' pretax contributions to DCFSAs and employer-subsidized childcare expenses (e.g., onsite day care centers) for 2026 and later plan years. This represents the first time the DCAP limit has increased since the maximum annual income exclusion amount was established by the Tax Reform Act of 1986 (except for a one-year increase in 2021 during the COVID-19 pandemic). DCAPs may be used to pay to provide care for "qualifying individuals" (i.e., a taxpayer's dependent child under 13 years of age, or a taxpayer's spouse or dependent who is incapable of caring for themselves) so that the taxpayer may work (or look for work). Unlike many similar limits, the DCAP limit is not indexed annually for inflation.

DCAP limit (IRC § 129(a)(2))	2026 and later	Before 2026
Individual	$7,500	$5,000
Married filing separately	3,750	2,500

Qualified transportation fringe benefits, adoption assistance programs, and educational assistance programs

The next table shows the 2026 adjusted figures for qualified transportation fringe benefits and adoption assistance programs set by Rev. Proc. 2025-32, along with 2025 and 2024 amounts. The limits reflect the 2.3% increase in the average chained CPI for the 12 months ending August 31, 2025. The increase in the qualified transportation fringe benefit also reflects the one-year shift in the base year for measuring inflation — from 1998 back to 1997 — as enacted by OBBBA. After applying the Code's rounding rules, all limits have increased since 2025. The annual income exclusion limit on employer-provided educational assistance program benefits will be indexed starting in 2027 and is tied to the same increase in average chained CPI.

Qualified transportation and adoption assistance limits	2026	2025	2024
Qualified transportation fringe benefits (IRC § 132(f))			
Maximum tax-free monthly qualified parking, transit passes or commuter highway vehicle benefit	$340	$325	$315
Qualified adoption assistance programs (IRC § 137)			
Exclusion for child with special needs (regardless of expenses incurred)	17,670	17,280	16,810
Aggregate dollar limit for all tax years (child without special needs)	17,670	17,280	16,810
Phaseout begins at modified AGI of	265,080	259,190	252,150
Phaseout completed at modified AGI of	305,080	299,190	292,150
Educational assistance programs (IRC § 127)			
Maximum tax-free employer-provided benefit	5,250	5,250	5,250

HSA and HDHP limits

IRS Rev. Proc. 2025-19 gives the 2026 inflation-adjusted amounts for HSA contributions, HDHP deductibles, and HDHP in-network out-of-pocket (OOP) maximums. The limits reflect the 2.5% increase in the average chained CPI-U for the 12 months ending March 31, 2025. The 2026 tax-deductible/tax-free HSA contribution limits, HDHP in-network OOP maximums, and HDHP minimum annual deductibles have increased for both self-only and family coverage. The HSA catch-up contribution limit is set by statute and hasn't changed since 2009. The 2026 HDHP OOP maximums are lower than the corresponding ACA limits for nongrandfathered group health plans. The following table shows the IRS limits for 2026 and the previous two years.

HSA and HDHP limits (IRC § 223)	2026	2025	2024
Self-only coverage			
Maximum tax-deductible/tax-free HSA contribution	$4,400	$4,300	$4,150
HDHP minimum annual deductible	1,700	1,650	1,600
HDHP in-network OOP maximum	8,500	8,300	8,050
Family coverage			
Maximum tax-deductible/tax-free HSA contribution	8,750	8,550	8,300
HDHP minimum annual deductible	3,400	3,300	3,200
HDHP in-network OOP maximum	17,000	16,600	16,100
HSA catch-up contribution limit (age ≥ 55)*	1,000	1,000	1,000

* Limit is set by statute and is not indexed.

ACA nongrandfathered group health plan OOP maximum

The ACA limits annual OOP costs for essential health benefits under nongrandfathered group health plans (unless they provide only excepted benefits, such as limited-scope dental or vision coverage). Unlike the CPI-based adjustments to HDHP OOP maximums, annual adjustments to the ACA OOP limits reflect increases in the US average per-person employer-sponsored health insurance premium since 2013.

Nongrandfathered group health plans — including large-group and self-funded ones — with an annual OOP limit for family coverage exceeding the permitted self-only OOP limit must “embed” individual OOP limits at or below the ACA limit for self-only coverage.

The 2026 OOP maximums reflect the revised methodology for calculating the “premium adjustment percentage,” as provided by the final Patient Protection and Affordable Care Act: Marketplace Integrity and Affordability rules published in June 2025. (The modified methodology uses a premium growth measure that reflects changes in *both* individual-market policies and employer-sponsored health coverage. The Department of Health and Human Services (HHS) used this methodology temporarily in 2020 and 2021. From 2015 through 2019, as well as 2022 through 2025, the adjustment captured the rate of premium growth for *only* employer-sponsored health coverage.) That rule announced the 2026 OOP limits on essential health benefits as $10,600 for self-only and $21,200 for other coverages, replacing the previously announced amounts of

$10,150 and $20,300. The OOP maximums apply on a plan-year basis, so the 2026 limits apply on the first day of the plan year starting in 2026. Using the revised premium adjustment percentage, the 2026 limits increased by 15.2% from the 2025 amounts.

(In January 2026, CMS published the 2027 OOP limits of $12,000 for self-only and $24,000 for family coverage, representing a 13.2% increase from the 2026 OOP limits.) The table below shows the limits for 2024–2026.

ACA nongrandfathered group health plan OOP maximums	2026	2025	2024
Self-only coverage (and embedded individual maximum in family coverage)	$10,600	$9,200	$9,450
Family coverage	21,200	18,400	18,900

ACA employer shared-responsibility (play-or-pay) assessments

Under the ACA's employer play-or-pay requirement, employers can face one of two IRS assessments. One potential assessment under Section 4980H(a) applies to employers that don't offer coverage to nearly all (95%) ACA full-time employees and their dependents. The other assessment under Section 4980H(b) applies to employers sponsoring coverage that either (i) isn't offered to some ACA full-time employees or (ii) is offered but doesn't meet ACA's affordability or minimum-value standards. While the 4980H(a) assessment is calculated using an employer's total number of ACA full-time employees, the 4980H(b) assessment applies per ACA full-time employee who receives subsidized coverage from a public exchange.

IRS Rev. Proc. 2025-26 gives the 2026 adjusted dollar amounts used to calculate employer play-or-pay assessments, reflecting the revised methodology for calculating the premium adjustment percentage (see ACA nongrandfathered group health plan OOP maximum, above). The resulting amounts have increased 15.2% from 2025, the largest increase ever for these limits. This large increase is only partially due to the revised premium adjustment percentage methodology. Even using the old methodology, the limits would have increased by 10.3%.

The next table shows the employer play-or-pay assessments for 2024–2026. Although the amounts shown are annual, the assessments are incurred and calculated monthly. (In January 2026, CMS published the 2027 premium adjustment percentage, allowing Mercer to project that the 2027 employer play-or-pay assessments will increase significantly to $3,780/$5,670.)

ACA employer play-or-pay assessments (IRC § 4980H)	2026	2025	2024
Not offering coverage (4980H(a))	$3,340	$2,900	$2,970
Offering coverage lacking minimum value or affordability (4980H(b))	5,010	4,350	4,460

ACA PTC eligibility and play-or-pay affordability percentages

Employers that don't offer affordable, minimum-value health coverage to ACA full-time employees and their children risk play-or-pay assessments if any employee receives a PTC or cost-sharing subsidy for public exchange health coverage. Affordability depends on how much an employee must pay as a percentage of household income for self-only coverage under the lowest-cost employer option with minimum value. Initially set at 9.5% of household income for 2014, this limit is annually indexed to reflect premium growth relative to incomes over the past year.

IRS Rev. Proc. 2025-25 announced that the 2026 affordability limit is 9.96%, a significant increase from 9.02% in 2025 and the highest level ever recorded. The table below shows the 2024–2026 limits, which determine an employee's PTC eligibility. The same limit applies to employees' spouses and dependents.[1]

ACA premium tax credit eligibility and play-or-pay affordability percentages for employer coverage	2026	2025	2024
Top % of income for lowest-cost self-only coverage with minimum value	9.96%	9.02%	8.39%

While failure to offer affordable coverage creates the risk of play-or-pay assessments, most employers don't know their employees' household incomes. As a result, a safe harbor definition of affordability for employer play-or-pay assessment purposes limits the employee cost for self-only, minimum-value coverage from an employer to 9.5% (in 2014) of one of three monthly amounts: W-2 wages, rate of pay, or the federal poverty line (FPL) for a single individual in the mainland US (the

[1] IRS final rules issued in October 2022 fix the so-called "family glitch" that based an employee's family members' PTC eligibility on the affordability of employee-only coverage. Starting in 2023, spouses and dependents of employees who are offered affordable self-only coverage but unaffordable family coverage can potentially qualify for PTCs (see IRS Reg. § 1.36B-2(c)(3)(v)(A)(2)). This change does not affect liability under the employer play-or-pay mandate or, according to IRS, employer reporting on Forms 1094/1095.

48 contiguous states and Washington, DC). This percentage is indexed using the same ACA formula as the household income percentage (Notice 2015-87, Q&A-12).

For employers using the FPL safe harbor to determine play-or-pay affordability, the next table shows the maximum required employee contribution that satisfies the safe harbor in the 48 contiguous states and Washington, DC. Note that the adjusted affordability percentages in the table above, and thus the dollar amounts in the table below, apply on a plan-year, not calendar-year, basis. This means noncalendar-year plans beginning in 2025 continue to use the 2025 level of $117.64/month to determine FPL affordability until their 2026 plan year starts.

ACA affordable monthly employee contribution limit for play-or-pay FPL safe harbor (48 contiguous states and Washington, DC)	2026	2025	2024
Calendar-year plans	$129.90	$113.20	$101.94
Noncalendar-year plans	132.47*	117.64	105.29
* Noncalendar-year plans may use the FPL in effect within six months before the first day of the plan year. HHS issued 2026 FPL guidelines on January 15, 2026. Noncalendar-year plans starting in 2026 benefit from using the higher 2026 FPL amounts.			

Trump accounts

Starting in July 2026, employers can voluntarily contribute to the Trump accounts of employees' dependent children and the accounts of employees who are under 18. Employees can also contribute on a pretax basis to the accounts of their dependent children (but not their own accounts) under an IRC Section 125 cafeteria plan (if the employer allows). Created by OBBBA, these accounts are a new kind of tax-preferred savings vehicle for individuals under 18.

Annual contributions from individuals and employers are limited to $5,000 in the aggregate. Up to $2,500 per year in employer contributions are excludable from the employees' income under new IRC Section 128. The $2,500 annual limit applies to the aggregate of employer contributions (if any) made directly to a Trump account and employee pretax contributions under a cafeteria plan. The $2,500 limit applies per employee regardless of how many dependent children the employee has. Both the $5,000 and $2,500 limits will be indexed for inflation starting in 2028.

Limitation on contributions to Trump accounts	2026	2025	2024
Total employer and individual contributions (IRC § 530A)	$5,000	N/A	N/A
Employer contributions excludable from employees' taxable income (includes employee §125 pretax contributions) (IRC § 128)	2,500	N/A	N/A

Medicare premiums, coinsurance, deductibles, and Rx subsidy

In November, CMS released the 2026 beneficiary premiums, deductibles, and other cost-sharing amounts for Medicare Parts A and B. All of the Part A and Part B amounts have increased from 2025. The 2026 Part D standard monthly premium, income-based premium adjustments, and cost sharing were announced earlier in the year. These amounts have also all increased from 2025.

Part A — Hospital insurance

Medicare Part A beneficiaries are subject to a deductible for inpatient hospital stays. If hospitalized more than 60 days, beneficiaries also must pay daily coinsurance, which varies by the length of the stay. Beneficiaries who receive services in a skilled nursing facility are subject to separate daily coinsurance.

Although most individuals qualify for premium-free Part A coverage, those who don't have 40 quarters of Medicare covered employment must pay monthly premiums. The Part A premium depends on how many covered quarters a beneficiary has and whether Medicare enrollment is due to age (such as seniors aged 65 and older) or disability. The next table shows the Part A deductibles, coinsurance amounts, and premiums for 2024–2026. (For more details on how these amounts are calculated, see the CMS notices on the Part A premium and Part A deductible and coinsurance.)

Part A — Hospital insurance	2026	2025	2024
Hospital inpatient deductible	$1,736	$1,676	$1,632
Hospital daily coinsurance			
Days 61–90	434	419	408
Lifetime reserve days	868	838	816
Skilled nursing facility daily coinsurance	217	209	204
Monthly premium for voluntary enrollees			
Seniors and certain people with disabilities under age 65 with fewer than 30 quarters of coverage	565	518	505
Seniors and certain people with disabilities under age 65 with at least 30 quarters of coverage	311	285	278

Part B — Medical insurance

Medicare beneficiaries with Part B coverage pay monthly premiums and an annual deductible. People in higher-income brackets pay higher premiums on a graduated scale that increases with annual income. An annually updated CMS notice on Part B premiums and deductibles gives details on how these amounts are calculated.

This table shows the Part B annual deductible and standard monthly premium for 2024–2026.

Part B — Medical insurance	2026	2025	2024
Annual deductible	$283.00	$257.00	$240.00
Standard monthly premium	202.90	185.00	174.70

The next table lists the Part B monthly premiums for 2024–2026, including the income-adjusted premiums for higher-income beneficiaries. The AGI thresholds for most Part B income-related monthly adjustment amounts started increasing with inflation in 2021. (The top bracket will be adjusted for inflation starting in 2028.)

Part B — Medical insurance monthly premiums					
2026		2025		2024	
Annual income	Monthly premium	Annual income	Monthly premium	Annual income	Monthly premium
Single					
$0 – $109,000*	$202.90	$0 – $106,000*	$185.00	$0 – $103,000*	$174.70
109,001 – 137,000	284.10	106,001 – 133,000	259.00	103,001 – 129,000	244.00
137,001 – 171,000	405.80	133,001 – 167,000	370.00	129,001 – 161,000	349.40
171,001 – 205,000	527.50	167,001 – 200,000	480.90	161,001 – 193,000	454.20
205,001 – 499,999	649.20	200,001 – 499,999	591.90	193,001 – 499,999	559.00
500,000 or more	689.90	500,000 or more	628.90	500,000 or more	594.00
Married filing jointly					
0 – 218,000*	202.90	0 – 212,000*	185.00	0 – 206,000*	174.70
218,001 – 274,000	284.10	212,001 – 266,000	259.00	206,001 – 258,000	244.60
274,001 – 342,000	405.80	266,001 – 334,000	370.00	258,001 – 322,000	349.40
342,001 – 410,000	527.50	334,001 – 400,000	480.90	322,001 – 386,000	454.20
410,001 – 749,999	649.20	400,001 – 749,999	591.90	386,001 – 749,999	559.00
750,000 or more	689.90	750,000 or more	628.90	750,000 or more	594.00
Married filing separately					
0 – 109,000*	202.90	0 – 106,000*	185.00	0 – 103,000*	174.70
109,001 – 390,999	649.20	106,001 – 393,999	591.90	103,001 – 396,999	559.00
391,000 or more	689.90	394,000 or more	628.90	397,000 or more	594.00

* Income bracket for most beneficiaries

Part D — Outpatient prescription drug coverage

Medicare Part D's outpatient prescription drug coverage requires enrollees to pay premiums, deductibles, and copayments, which are indexed each year to reflect changes in Medicare beneficiaries' average total drug expenses. Annual indexing also applies to the retiree drug subsidy (RDS), which reimburses a portion of retiree drug plan sponsors' expenses for individuals who are eligible for but not enrolled in a Part D plan. Rather than continue in the RDS program, many employers have turned to employer group waiver plans (EGWPs) for greater cost savings due to ACA provisions.

The Inflation Reduction Act of 2022 made significant changes to Medicare Part D benefits. Starting in 2025, the law eliminated the standard Part D benefit initial coverage limit (aka the "donut hole") and reduced the OOP threshold from $8,000 to $2,000. The law also eliminated the standard Part D benefit cost sharing for catastrophic coverage starting in 2024, so after individuals reach the OOP maximum, they pay nothing for the prescription drugs for the remainder of the year.

The next table summarizes 2024–2026 Part D standard benefits, RDS benefits, and the monthly Part D base premium.

Part D benefits and RDS amounts	2026	2025	2024
Standard Part D benefit			
Deductible	$615.00	$590.00	$545.00
Initial coverage limit	N/A	N/A	5,030.00
OOP threshold	2,100.00	2,000.00	8,000.00
Total covered Part D spending at OOP threshold	N/A	N/A	11,477.39
Retiree drug subsidy (RDS)			
Cost threshold (Part D deductible)	615.00	590.00	545.00
Cost limit	12,650.00	12,150.00	11,200.00
Maximum subsidy per retiree: 28% × (cost limit – cost threshold)	3,369.80	3,268.80	2,983.40
Monthly Part D premium			
Base beneficiary premium (national average Part D premium)	38.99	36.78	34.70

As required by the ACA, the Part D program charges higher premiums to higher-income enrollees. The usual monthly premium is paid to the plan; the added amount (or "adjustment") for higher-income beneficiaries is deducted from an enrollee's Social Security benefits and paid to Medicare. The next table summarizes 2024–2026 monthly Part D premium adjustments for different annual income tiers. The AGI thresholds for most Part D income-related monthly adjustments started increasing with inflation in 2020. (The top bracket will be adjusted for inflation starting in 2028.)

Part D income-related monthly adjustment amounts					
2026		2025		2024	
Annual income	Monthly adjustment amount	Annual income	Monthly adjustment amount	Annual income	Monthly adjustment amount
Single					
$0 – $109,000*	$0.00	$0 – $106,000*	$0.00	$0 – $103,000*	$0.00
109,001 – 137,000	14.50	106,001 – 133,000	13.70	103,001 – 129,000	12.90
137,001 – 171,000	37.50	133,001 – 167,000	35.30	129,001 – 161,000	33.30
171,001 – 205,000	60.40	167,001 – 200,000	57.00	161,001 – 193,000	53.80
205,001 – 499,999	83.30	200,001 – 499,999	78.60	193,001 – 499,999	74.20
500,000 or more	91.00	500,000 or more	85.80	500,000 or more	81.00
Married filing jointly					
0 – 218,000*	0.00	0 – 212,000*	0.00	0 – 206,000*	0.00
218,001 – 274,000	14.50	212,001 – 266,000	13.70	206,001 – 258,000	12.90
274,001 – 342,000	37.50	266,001 – 334,000	35.30	258,001 – 322,000	33.30
342,001 – 410,000	60.40	334,001 – 400,000	57.00	322,001 – 386,000	53.80
410,001 – 749,999	83.30	400,001 – 749,999	78.60	386,001 – 749,999	74.20
750,000 or more	91.00	750,000 or more	85.80	750,000 or more	81.00
Married filing separately					
0 – 109,000*	0.00	0 – 106,000*	0.00	0 – 103,000*	0.00
109,001 – 390,999	83.30	106,001 – 393,999	78.60	103,001 – 396,999	74.20
391,000 or more	91.00	394,000 or more	85.80	397,000 or more	81.00

*Income bracket for most beneficiaries

Social Security and SSI amounts

On October 24, 2025, SSA announced a 2.8% cost-of-living increase for 2026 benefits, reflecting the change in the third-quarter CPI for Urban Wage Earners and Clerical Workers (CPI-W) from 2024 to 2025. Other 2026 Social Security amounts are tied to the 4.84% increase in average annual wages from 2023 to 2024. The next table shows key Social Security values for 2024–2026 from SSA's 2025 fact sheet and automatic determinations webpage.

Social Security and SSI values	2026	2025	2024
Cost-of-living increase	2.8%	2.5%	3.2%
Average annual wage (second preceding year)	$69,846.57	$66,621.80	$63,795.13
OASDI contribution and benefit base (wage base)	184,500	176,100	168,600
“Old law” contribution and benefit base	137,100	130,800	125,100
Retirement earnings test exempt amount (annual)			
Under full retirement age (full year)	24,480	23,400	22,320
Year individual reaches full retirement age (period	65,160	62,160	59,520
Wages needed for a quarter of coverage	1,890	1,810	1,730
Disability thresholds (monthly amounts)			
Substantial gainful activity — not blind	1,690	1,620	1,550
Substantial gainful activity — blind	2,830	2,700	2,590
Trial work period	1,210	1,160	1,110
Coverage thresholds for			
Domestic employees	3,000	2,800	2,700
Election workers	2,500	2,400	2,300
Bend points — primary insurance amount (PIA) formula applied to average indexed monthly earnings (AIME)			
90% of AIME up to 32% of AIME over first bend point	1,286	1,226	1,174
32% of AIME over first bend point up to 15% of AIME over second bend point	7,749	7,391	7,078
Bend points — maximum family benefit formula applied to worker’s PIA			
150% of PIA up to 272% of PIA over first bend point	1,643	1,567	1,500
272% of PIA over first bend point up to 134% of PIA	2,371	2,262	2,166
134% of PIA over second bend point up to 175% of PIA	3,093	2,950	2,825
SSI federal payment standard (monthly amounts)			
Individual	994	967	943
Couple	1,491	1,450	1,415
SSI student exclusion limits			
Monthly limit	2,410	2,350	2,290
Annual limit	9,730	9,460	9,230

Related resources

Non-Mercer resources

- Poverty guidelines (HHS)
- Covered employment for Social Security credits (SSA)
- National average wage index (SSA)
- Social Security amounts determined by automatic adjustment (SSA)
- Chained Consumer Price Index for All Urban Consumers (Bureau of Labor Statistics)
- CC-RI 26-03 (Puerto Rico Treasury, February 20, 2026)
- Premium Adjustment Percentage, Maximum Annual Limitation on Cost Sharing, Reduced Maximum Annual Limitation on Cost Sharing, and Required Contribution Percentage for the 2027 Benefit Year (CMS, January 29, 2026)
- ERISA 4044 expense load (PBGC, January 20, 2026)
- Annual update of the HHS poverty guidelines (Federal Register, January 15, 2026)
- Rev. Rul. 2026-1 (IRS, December 12, 2025)
- Medicare Part A premiums for 2026 (Federal Register, November 19, 2025)
- Medicare Part A inpatient hospital deductible and hospital and extended care services coinsurance amounts for 2026 (Federal Register, November 19, 2025)
- Medicare Part B monthly actuarial rates, premium rates and annual deductible for 2026 (Federal Register, November 19, 2025)
- 2026 Medicare Parts A & B premiums and deductibles (CMS, November 14, 2025)
- Notice 2025-67, 2026 contribution and benefit limits for qualified retirement plans (IRS, November 13, 2025)
- Present value of PBGC maximum guarantee and spreadsheet (PBGC, November 10, 2025)

- Maximum monthly guaranteed benefit tables for single-employer plans in 2026 and earlier years (PBGC, October 30, 2025)
- Premium rates for 2026 and earlier years (PBGC, October 28, 2025)
- Fact sheet, 2026 Social Security changes (SSA, October 24, 2025)
- Rev. Proc. 2025-32, 2026 limits for health FSAs; QSEHRAs; and qualified LTC policies, transportation fringe benefits and adoption assistance programs (IRS, October 9, 2025)
- Annual release of Part D national average bid amount and other Part C & D bid information (CMS, July 28, 2025)
- Pub. L. No. 119-21, One Big Beautiful Bill Act (Congress, July 4, 2025)
- Rev. Proc. 2025-26, 2026 employer shared-responsibility indexed assessments (IRS, July 22, 2025)
- Rev. Proc. 2025-25, 2026 employer shared-responsibility affordability percentage (IRS, July 17, 2025)
- Final rule, Patient Protection and Affordable Care Act: Marketplace Integrity and Affordability (Federal Register, June 25, 2025)
- Rev. Proc. 2025-19, 2026 inflation-adjusted HSA, HDHP, and employer contribution limit for excepted-benefit HRA amounts (IRS, May 1, 2025)
- RDS cost threshold and cost limit by plan year (CMS, April 7, 2025)
- Announcement of calendar-year 2026 Medicare Advantage capitation rates and Part C and Part D payment policies (CMS, April 7, 2025)
- Final rule, Affordability of employer coverage for family members of employees (Federal Register, October 13, 2022)
- Q&A-55 on ACA employer shared-responsibility provisions — assessments (IRS, August 16, 2022)
- Q&A-40 on ACA employer shared-responsibility provisions — affordability percentage (IRS, August 16, 2022)
- Notice 2015-87 (IRS, December 16, 2015

Mercer Law & Policy resources

- 2026 federal poverty levels can impact ESR affordability (January 22, 2026)
- 2026 quick benefit facts (January 21, 2026)
- Employers can contribute to Trump accounts starting next July (December 16, 2025)
- 2026 retirement plan limits now set (November 14, 2025)
- 2026 Social Security, PBGC, projected covered compensation figures (November 11, 2025)
- Top 10 health, fringe and leave benefit compliance and policy issues in 2026 (October 30, 2025
- 2026 health FSA, other health and fringe benefit limits now set (October 13, 2025)
- OBBBA makes tax-free student loan reimbursements permanent (August 12, 2025)
- Big Beautiful Bill permanently enhances dependent care benefits (July 23, 2025)
- 2026 affordability percentage for employer health coverage increases (July 22, 2025)
- One Big Beautiful Bill includes employer-friendly provisions (July 8, 2025)
- 2026 HSA, HDHP, and excepted-benefit HRA figures set (May 1, 2025; revised June 27, 2025)
- 2025 federal poverty levels can impact ESR affordability (January 21, 2025)