From the Desk of



Health Reform Questions Out-of-Pocket Limits for 2015

April 27, 2014

Question: What is the out-of pocket limits for 2015?

Answer:

For 2015, please be aware that there will two different out-of-pocket limits.

Overall Out-of-Pocket Limits:

There is an overall cost-sharing limitation to all non-grandfathered group health plans, as provided in HHS Reg. § 156.130(a); PPACA; Standards Related to Essential Health Benefits, Actuarial Value, and Accreditation, 45 CFR Parts 147, 155, and 156, 78 Fed. Reg. 12834, 12837 (Feb. 25, 2013).

The overall cost-sharing limits for plan years beginning in 2014 are the same as the maximum out-of-pocket expense limits for self-only and family coverage for HSA-compatible high-deductible health plans (HDHPs) for taxable years beginning in 2014, as provided in PPACA, Pub. L. No. 111-148, § 1302(c)(1)(A) (2010).

For 2014, these limits are \$6,350 for self-only coverage and \$12,700 for family coverage. The limits for 2015 are \$6,600 for self-only coverage and \$13,200 for other than self-only coverage, as provided in PPACA; HHS Notice of Benefit and Payment Parameters for 2015, 45 CFR Parts 144, 147, 153, 155, and 156, 79 Fed. Reg. 13743, 13802 (Mar. 11, 2014).

For a plan year beginning in a calendar year after 2014, the cost-sharing limit for self-only coverage is the amount for self-only coverage for plan years beginning

in 2014, increased by an index amount equal to the product of that amount and the "premium adjustment percentage" for the calendar year. For coverage other than self-only coverage, the cost sharing limit for a plan year beginning in a calendar year after 2014 is twice the amount for self-only coverage. The premium adjustment percentage for a calendar year is the percentage by which the average per capita premium for health insurance coverage in the United States for the preceding calendar year (as estimated by HHS by October 1 of the preceding calendar year) exceeds the average per capita premium for 2013 (as determined by HHS).

Out-of-Pocket Limits for HDHP Coverage for HSA Contributions

For 2015, the out-of- pocket limits for a High Deductible Health Plans (HDHP) to be eligible to contribute to a Health Savings Accounts will be different. Under Revenue Procedure 2014-30, the IRS indicated that the 2015 maximum limit on out-of-pocket expenses (including items such as deductibles, co-payments, and co-insurance, but not premiums) for self-only HDHP coverage is \$6,450 (a \$100 increase from 2014), and the limit for family HDHP coverage is \$12,900 (a \$200 increase from 2014).