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Annual Out-of-Pocket Maximum Adjustments Announced for 2025

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The Department of Health and Human Services ("HHS") published the "payment parameters" portion of its Annual Notice of Benefit and Payment Parameters for 2025. For purposes of employer-sponsored health plans, the guidance includes the limits on annual out-of-pocket expenses (deductibles, co-payments, and other amounts, but not premiums) for non-grandfathered group medical plans for plan years that begin in 2025.

Change to the Out-of-Pocket Maximums

The out-of-pocket maximum for non-grandfathered group medical plans will be decreased for plan years beginning on or after January 1, 2025, as follows:

- \$9,200 for self-only coverage (down from \$9,450 for 2024)
- \$18,400 for coverage other than self-only (down from \$18,900 for 2024).

It is important to note that the out-of-pocket maximum limits for non-grandfathered group medical plans are different (and generally higher) than the out-of-pocket maximum limits required for high-deductible health plans ("HDHPs") that are compatible with health savings account ("HSA") eligibility.

Employer Action

Non-grandfathered group medical plans should update out-of-pocket limits for plan years beginning on or after January 1, 2025.