



LEGAL UPDATE

IRS releases health FSA limits for 2026

On Oct. 9, 2025, the IRS released [Revenue Procedure 2025-32](#) (Rev. Proc. 25-32), which includes the 2026 inflation-adjusted limit on employee salary reduction contributions to health flexible spending accounts (FSAs). For plan years beginning in 2026, the adjusted dollar limit on employees' pretax contributions to health FSAs increases to **\$3,400**. This is a \$100 increase from the 2025 health FSA limit of \$3,300.

The Affordable Care Act (ACA) imposes a dollar limit on employees' salary reduction contributions to health FSAs. This limit started at \$2,500 for plan years beginning on or after Jan. 1, 2013, and has been adjusted for inflation for subsequent plan years. Employers should ensure their health FSAs won't allow employees to make pretax contributions over \$3,400 for the 2026 plan year. Employers can impose a lower limit on employees' pretax contributions to a health FSA.

Employers should confirm that their health FSA contribution limit is included in the plan's documents and communicate it to employees at enrollment time.

HIGHLIGHTS

- The health FSA contribution limit increases to \$3,400 for plan years beginning in 2026.
- Employers may impose their own dollar limit on employee contributions to health FSAs, up to the ACA's maximum.
- Employers should communicate their 2026 limit to employees as part of the enrollment process.
- The limit on health FSA carryovers increases to \$680 for plan years beginning in 2026.

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Pretax contributions

The ACA's dollar limit applies only to employees' pretax contributions to a health FSA. Nonelective employer contributions to a health FSA (e.g., matching contributions or flex credits) generally don't count toward the health FSA contribution limit. However, if employees may elect to receive the employer contributions in cash or as a taxable benefit, then the contributions must be treated as salary reductions and counted toward the health FSA contribution limit.

Per-employee limit

The health FSA limit applies on an employee-by-employee basis. Each employee may only elect up to \$3,400 in salary reductions in 2026, regardless of whether they have family members who benefit from the funds in that FSA. However, each family member eligible to participate in their own health FSA has a separate limit. For example, a married couple who has their own health FSAs can both make salary reductions of up to \$3,400 for 2026, subject to any lower employer limits.

Health FSA carryovers

As an exception to the use-or-lose rule, employers with health FSAs may allow employees to carry over a certain amount of funds remaining at the end of a plan year to reimburse eligible expenses incurred in the plan year immediately following. The maximum carryover amount is adjusted annually for inflation. For 2026, Rev. Proc. 25-32 increases the maximum carryover limit to \$680 (from \$660 for 2025 plan years). Employers that allow carryovers may impose their own limit that is lower than the maximum carryover limit.



As health plan sponsors navigate open enrollment, it's important that employees are made aware of the adjusted limits as they update their enrollment information for 2026.



Please contact us with any questions.

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