

Comparing the state auto-IRA and an employer-sponsored plan, point by point.

Beginning July 1, 2027, Washington employers that have operated in the state at least two years, whose employees worked a combined 10,400 hours or more the prior year, and who do not already offer a qualified retirement plan to employees with one year or more of continuous service, must either enroll their workers in Washington Saves or sponsor a qualifying plan of their own.

Washington Saves is a state-facilitated automatic IRA. Employees are enrolled automatically and may opt out at any time, and employers act only as a conduit for payroll deductions without fiduciary responsibility.

Both paths satisfy the mandate, and they work differently. The table below compares them on the points that matter most to a business owner and to employees, so you can weigh which fits your business.

Consideration	Washington Saves (Auto-IRA)	Employer-Sponsored Plan
Annual contribution limit	Uses IRA limits. About \$7,500 per year, or \$8,600 if age 50 or older (2026 IRS limits, adjusted periodically for inflation).	Uses 401(k) limits. About \$24,500 per year, or \$32,500 if age 50 or older (2026 IRS limits, adjusted periodically for inflation).
Employer contributions	Not permitted. Under federal law, employers cannot contribute to a worker's IRA.	Permitted. Employers may match or make profit sharing contributions, but are not required to.
Employer tax credits	Not available to the employer.	May qualify for SECURE 2.0 startup credits (up to \$5,000 per year for three years) and a \$500 per year auto-enrollment credit, subject to eligibility.
High earners and owners	Expected to operate mainly as a Roth IRA, like most state auto-IRA programs, pending final rules. If so, Roth income phase-outs could limit higher-paid owners and key staff	No income limit on 401(k) deferrals, so owners and key employees can participate at the full limit.
Plan design flexibility	Standardized. The contribution structure and investment menu are set by the state board, with limited customization.	Customizable. Vesting schedules, profit sharing, eligibility rules, and match formulas can be tailored to the business.
Employer workload	Register, provide employee data, distribute program disclosures, and withhold and remit contributions on time.	Set up and maintain the plan (document, filings, testing). These duties can be delegated to a recordkeeper, TPA, and advisor.
Fiduciary role	Employer is not a fiduciary and has no liability for program investment results.	Employer is a plan fiduciary. Investment and administrative duties can be delegated to a firm such as FHTC, but oversight remains.

Consideration	Washington Saves (Auto-IRA)	Employer-Sponsored Plan
ERISA obligations	None. The auto-IRA is not an ERISA plan, so there is no plan document, Form 5500, testing, or fidelity bond.	Governed by ERISA. Requires a plan document, annual Form 5500, nondiscrimination testing, and a fidelity bond. These can be delegated but not eliminated.
Upfront cost	No state program fees and no setup fees, though facilitating the program still takes some payroll administration time.	Setup and ongoing administration costs apply. Startup tax credits may offset some or all of these in the early years, depending on eligibility.

The bottom line

Washington Saves satisfies the state mandate and gives employees a straightforward way to save through payroll, with no program fees or fiduciary duty for the employer. Its trade-offs are lower contribution limits, no employer contributions, and no employer tax credits.

An employer-sponsored plan meets the same mandate while raising contribution limits, allowing employer contributions, and potentially qualifying the business for startup tax credits. It also carries added cost and a fiduciary role. For a very small or thin-margin employer with no wish to contribute, the auto-IRA may be the better fit. For an employer that wants to contribute and can use the tax credits, a sponsored plan may be. The right choice depends on the goals, budget, and workforce of the business.

The 401(k) is not the only alternative. Several qualified plans satisfy the mandate, and the right one depends on the size and goals of the business. Options include a safe harbor 401(k), a SIMPLE IRA, a SEP IRA, profit sharing, and, for firms wanting larger owner contributions, a 401(k) paired with a cash balance plan. We can help match the plan type to the business.

Comparing your options before 2027? First Hill Trust Company works with Washington employers weighing this decision and can walk you through both paths so you can choose what fits your business. Contact us to talk it through.

About First Hill Trust

First Hill Trust is a retirement plan solution provider that supports a comprehensive employee benefit back office for plan sponsors who want clearer accountability, stronger governance, and fewer operational handoffs. Our work is grounded in fiduciary oversight. We focus on helping sponsors understand where responsibility sits, how decisions are executed, and how oversight functions in practice, not just on paper.

We work behind the scenes to support plans that value clarity, consistency, and confidence in how they are managed. If you'd like more information or a high-level review of how your retirement plan is governed today, click the link to [schedule a brief review](#), or contact us (206) 625-1800.



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Under the Employee Retirement Income Security Act of 1974 ("ERISA"), fiduciary status is determined by the functions performed and the authority exercised, not by titles alone. Whether a party is acting as a fiduciary, and the scope of any related duties or liabilities, depends on the specific facts and circumstances. Engaging a trustee, investment adviser, or other service provider does not eliminate a plan sponsor's or committee's fiduciary responsibility to prudently select, monitor, and oversee those providers.

References to ERISA, the Internal Revenue Code, SECURE 2.0, Washington Saves, or other federal or state laws, regulations, or government programs are general summaries only and should not be interpreted as legal guidance or a complete statement of the law. Laws, regulations, agency guidance, and program requirements are subject to change and interpretation. Examples and illustrations are simplified for explanatory purposes and may not reflect every circumstance or apply to every employer or retirement plan.

Unless otherwise noted, figures, contribution limits, tax credits, and other numerical examples are current as of 2026 and are subject to change. IRS contribution limits and catch-up amounts are adjusted periodically for inflation. Eligibility for SECURE 2.0 tax credits depends on individual facts and circumstances. Certain Washington Saves program provisions, including default contribution rates, investment options, and implementation details, remain subject to final program rules and may change before implementation.

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