

Guide to
Benefits
Administration

MiMBB

A Financial Services Ministry™

Are you new to Benefits Administration?

If you are assuming responsibility for benefits administration for your church or ministry, this guide will provide you with helpful information.

While this publication discusses various types of benefits and their tax implications, it is not intended to be a substitute for legal, accounting or other professional advice. If legal, tax or other expert assistance is required, we recommend that you seek the services of a competent professional.

Dear Employer,

Thank you for partnering with MMBB Financial Services. With your support, we are able to provide retirement and financial planning benefits to your employees.

The *Guide to Benefits Administration* was created with you, the employer, in mind. The guide provides a resource to assist you and your staff with taking full advantage of all that MMBB has to offer.

This guide explains how to:

- Verify that staff are eligible for benefits
- Enroll new staff for MMBB benefits
- Report compensation and other changes to MMBB
- Provide tax information to the IRS
- Pay your monthly premium using one of four methods: payment portal, mail, email, or phone

This year, we call your attention to additional information we think you will find helpful as you administer your employee benefits.

We continue to advance our online employer platform. Look for additional administrative services to become available.

Also, please remind your staff to take advantage of our **financial planning services**. MMBB has financial planning professionals available for a consultation—as a benefit of membership.

If you have questions regarding the payment portal or MMBB, please contact a Senior Benefits Specialist at **800.986.6222**.

To download additional copies of this guide—and other helpful materials for church administrators—visit www.mmbb.org/church-finance/benefits-administration.

MMBB Financial Services looks forward to building a long-lasting partnership throughout your journey with us.



Louis P. Barbarin, CPA
Chief Executive Officer

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1 Eligibility

For federal income tax purposes, the Internal Revenue Service (IRS) limits enrollment in denominational benefit plans to:

- Clergy and laypersons employed by an eligible church or ministry (your organization may set its own requirements regarding full or part-time employment) and;
- Ministers or chaplains employed elsewhere, such as in a hospital, nursing home or school.

Generally, *self-employed* individuals who provide services to your church or ministry are not eligible for enrollment. There are certain exceptions which include consulting clergy, whom your organization may treat as *self-employed* for federal reporting purposes.

Do You Have an Adoption Agreement on File With MMBB?

If you are a new employer with MMBB Financial Services, you must have an Adoption Agreement on file for each retirement plan that you offer before you can start enrolling employees in the plan(s). If you are currently offering retirement benefits through MMBB, and want to add a plan, please contact our Service Center for assistance.

If you are not sure whether you have the necessary agreement on file please contact us at **800.986.6222**.

2 Enrollment

Plan Options

As both a ministry and a financial organization, MMBB Financial Services understands how important it is for faith-based organizations to recruit and retain top staff. We understand how important it is for the staff of faith-based organizations to feel financially secure so they can put their full effort into the ministry.

That's why our plans are tailored to be affordable and flexible. No matter the size of your budget, MMBB Financial Services offers plans that meet your needs.

MMBB offers three retirement plan options: Comprehensive Plan, Retirement Only Plan and Member Contribution Plan.

MMBB Plan Comparison			
	Comprehensive Plan	Retirement Only Plan	Member Contribution Plan
Retirement Savings	●	●	●
Life Insurance Benefits	●	●	●
Disability Coverage	●	●	●
Funding	Monthly employer premium contributions	Employer contributions	Employee contributions

The **Comprehensive Plan** is an **employer-funded**, tax-deferred 403(b) retirement plan that includes a retirement savings plan, disability coverage and a death benefit. Your church or ministry pays a monthly premium based on a percentage of the employee's total reported compensation.

The current death benefit allocation is 1 percent of the premium, and the Special Benefits Fund allocation is also 1 percent. The remainder of the premium used to provide employees with retirement benefits is 7 to 17 percent, and 1 percent of the premium is used for assistance to ministers and lay employees.

This Plan includes:

- **Retirement benefits**—The Comprehensive Plan provides income that lasts as long as you live. The MMBB Financial Services annuity is designed to help you keep pace with inflation because the payments are not fixed and vary based on market and actuarial factors.
- **Disability income**—Disability coverage is available to those participating in the Comprehensive Plan. In conjunction with governmental disability and retirement benefits, MMBB's disability coverage replaces a percentage of employees' pre-disability compensation while they remain disabled as defined by the plan. The disability benefit MMBB offers protects the member as well as the employer.¹

MMBB's disability coverage offers a combination of benefits you are unlikely to find elsewhere:

- Monthly allowances for dependent children under 21
- Continued death benefit coverage
- Continued contributions to the employee's MMBB retirement account
- Annual cost of living adjustment
- Continuation of eligible employer provided group health insurance

As soon as you become aware that your employee is disabled, please contact MMBB.

¹ Maximum annual compensation allowable for benefit purposes in \$250,000.

- **Death benefit**—The Comprehensive Plan includes a death benefit if your employee is a premium paying member. Upon notification of death, the benefit paid depends upon age at death and the MMBB reported compensation.

Life Insurance Coverage with Two or More Years of Membership¹
(AS A MULTIPLE OF YOUR ANNUAL COMPENSATION)

Age at death	Coverage ²
Younger than 41	5X
41 but not yet 51	4X
51 but not yet 61	3X
61 but not yet 66	2X
66 to retirement	1.5X

¹ Maximum annual compensation allowable for benefit purposes is \$250,000.

² Death benefit before completing one year of membership is 1/3 of amount shown above. For death with one year but less than two years of membership coverage is 2/3 of amount shown above.

Additional features of the death benefit include:

- An accidental death provision that provides the beneficiary with an additional benefit equal to 100% of the member's compensation.
- Living benefits for the terminally ill—If a member is terminally ill and expected to die within two years, they may apply to receive an early payment of up to half the value of the group term death benefit. The balance is payable upon death.
- Child allowances—If a member dies while they are an active participant in the Comprehensive Plan, each eligible child will receive a monthly cash benefit for support. The benefit continues until the dependent child turns 21.
- Medical insurance—The member's spouse and children may be eligible to have two years' worth of premiums paid if they were already covered by employer-provided group health insurance.

The Retirement Only Plan is a stand-alone *employer-funded* tax-deferred 403(b) retirement savings plan. It can be customized with flexible vesting and matching options.

The Member Contribution Plan is an *employee-funded*, 403(b) retirement savings plan. The employee makes pre-tax contributions via a Salary Reduction Agreement (see page 13 for additional requirements). After-tax contributions are also accepted.

Your monthly invoice lists the plans in which you are currently participating. See the sample invoice on page 15.

Employer Provided Health Insurance

MMBB Financial Services recommends that you provide health insurance coverage to your employees.

Offering health insurance helps you retain talented employees and frees them from shopping for coverage on the open market. For more information on your options, visit www.healthcare.gov or contact a private insurer.

The Five Most Common Benefits for Church Employees

TOP NON-SALARY BENEFITS FOR PASTORAL LEADERS

- 
Paid Vacation
- 
Health Insurance
- 
Retirement Plan Access and/or Contributions
- 
Housing Allowance
- 
Reimbursable Ministry-Related Expenses

TOP NON-SALARY BENEFITS FOR CHURCH STAFF

- 
Paid Vacation
- 
Health Insurance
- 
Retirement Plan Access and/or Contributions
- 
Life Insurance
- 
Disability

This article is excerpted from Church Finance Today's April 2019 issue.

Membership Application

To enroll an employee, have them complete a **Membership Application (Form A-1)**. You may obtain this form by calling MMBB at **800.986.6222**. To submit completed forms email them to Forms@mmbb.org or mail them to:

MMBB Financial Services
475 Riverside Drive, Suite 1700
New York, NY 10115-0049

Sample enrollment form, page 1

MMBB RETIREMENT PLANS MEMBERSHIP APPLICATION (Form A-1)

PLEASE PRINT OR TYPE

Personal Information

Title	First Name	MI.	Last Name
Gender <input type="radio"/> M <input type="radio"/> F	Date of Birth	Social Security Number	
Home Address	City	State	Zip Code
Home Phone	Cell Phone	Email Address	
For Clergy: Please indicate ministerial status: <input type="radio"/> Ordained <input type="radio"/> Commissioned <input type="radio"/> Licensed			
For Clergy: Is your employer eligible to designate a portion of your compensation as housing allowance or rental value of parsonage, plus utilities, which would not be reported as taxable income? <input type="radio"/> Yes <input type="radio"/> No			
Ordination Status Granted By		Years employed in church or church related ministry: (years) (months)	

Dependent Information (if applicable)

Spouse's Full Legal Name: First/Middle/Last	Social Security No.	Date of Birth
Name of Child Under 18	Gender <input type="radio"/> M <input type="radio"/> F	Date of Birth
Name of Child Under 18	Gender <input type="radio"/> M <input type="radio"/> F	Date of Birth
Name of Child Under 18	Gender <input type="radio"/> M <input type="radio"/> F	Date of Birth
Name of Child Under 18	Gender <input type="radio"/> M <input type="radio"/> F	Date of Birth

Plan Enrollment

Please indicate below which Plan(s) this Application applies to. The Employer will need to confirm eligibility for the Plan(s) listed and complete the relevant contribution information for the Employer Plan(s), as applicable. In order for an employee to be eligible for any of the Plans listed below, the Employer must have agreed, in accordance with MMBB's rules and procedures, to be a Participating Employer of such Plan.

EMPLOYER PLANS

A. **Comprehensive Plan** (also known as the Retirement Plan)
Unless otherwise changed in writing, the employer, in accordance with MMBB's policies and procedures and subject to the terms of the Retirement Plan: will contribute _____% of the employee's applicable annual compensation (as defined under the Retirement Plan)

B. **Retirement Only Plan** (also known as the Tax-Deferred Annuity Plan (TDA))
Unless otherwise changed in writing, the employer, in accordance with MMBB's policies and procedures and subject to the terms of the Tax-Deferred Annuity Plan:
 will contribute \$_____ per month
OR
 will contribute _____% of the employee's applicable annual compensation (as defined under the Tax-Deferred Annuity Plan)
OR
 will make periodic contributions

EMPLOYEE PLAN

C. **Member Contribution Plan** (also known as the Annuity Supplement (TAS))
Unless otherwise changed in writing, the member, in accordance with MMBB's policies and procedures and subject to the terms of the Annuity Supplement including the completion of a Salary Reduction Agreement, makes the following election. **Form A-13a must be completed prior to the election being valid.**
 will contribute a specific dollar amount per pay period
OR
 will contribute a specified percentage of total annual compensation per pay period
OVER

When enrolling in the **Comprehensive Plan**, your church or ministry's monthly premium will be based on this figure.

When enrolling in the **Retirement Only Plan**, this amount will appear on your monthly invoice.

Employees can enroll in the **Member Contribution Plan** and make pre-tax salary reduction contributions to their retirement plan.

Employees can elect to contribute a specific dollar amount or a percentage of their compensation per pay period. A Salary Reduction Agreement (Form A-13a) with their employer is also required. See page 13 for further requirements.

Sample enrollment form, page 2

Employment Information

Church or Organization		Billing Contact Name	
Billing Contact Phone		Billing Contact Email Address	
Address	City	State	Zip Code
Employment Start Date	Position	Denomination/Affiliation	

Compensation Information (To be completed by the employer. Please round to the nearest dollar.)

A. Annual cash salary (Include certain amounts withheld on a pre-tax basis as provided in the plan(s), such as amounts withheld for TAS and Flexible Spending Accounts) \$ _____ per year

B. Housing (either 1 or 2)

1. Parsonage (include parsonage rental value and any Allowance) \$ _____ per year

OR

2. Housing allowance \$ _____ per year

Total Housing (either 1 or 2) \$ _____ per year

C. Social Security/Medicare tax offset \$ _____ per year

Yes, it should be included in the premium calculation

No, it should not be included in the premium calculation

D. Total annual compensation* \$ _____ TOTAL

* Does not include Comprehensive Plan premiums or Retirement Only contribution, medical premiums, or ministry-related expenses such as car expenses, continuing education, convention expenses, books, periodicals, etc.

Agreement

I understand that payment of an initial premium with respect to each applicable MMBB retirement plan is required before I can become a member of that particular plan (unless otherwise required by law) and that my application for participating in any MMBB plan is subject to the approval of MMBB. I understand that my eligibility for membership in an MMBB retirement plan is governed by and subject to the terms of said plan(s) for which I apply and MMBB's rules and procedures and/or policies with respect thereto. I agree to adhere to the provisions and any amendments of said plans for which I apply and any rules, procedures and/or policies with respect thereto.

I understand an indication of eligibility for enrollment in a particular plan or plans is not a promise of continued participation, as participation always is subject to MMBB's rules, policies and procedures and applicable law, as well as the Employer's status as a Participating Employer. Furthermore, the indicated contribution for an Employer Plan is not a promise that the level of contribution indicated will continue, as it also remains subject to MMBB's rules, policies and procedures and applicable law and the Employer's determination.

I understand that my ability to take distributions from any MMBB retirement plan may be limited by plan provisions, MMBB rules, policies and/or procedures and applicable law.

I agree to update any personal information, dependent information and employment information as applicable with MMBB as soon as possible after a change occurs.

Signature of applicant	Date
Signature of employer	Date

The Retirement Plan, Tax Deferred Annuity Plan and The Annuity Supplement (the Plans) are retirement programs maintained by The Ministers and Missionaries Benefit Board (MMBB). The Plan and/or any account maintained by MMBB to manage or hold assets of the Plan, and any interest in such Plan or accounts (including any funds maintained by MMBB) are not subject to registration, regulation, or reporting provisions of the Investment Company Act of 1940, the Securities Act of 1933, the Securities Act of 1934, Title 15 of the United States Code, or state securities laws. Therefore, participants and beneficiaries under the Plan will not be afforded the protections of those provisions. MMBB reserves the right to amend, modify or terminate the Plans at any time.

Please return this completed form to:

MMBB Financial Services
475 Riverside Drive, Suite 1700 New York, NY 10115-0049
Phone: 800.986.6222 Fax: 800.986.6782 Web: www.mmbb.org
A01M0215

See the instructions below on how to calculate compensation.

To learn more about how to calculate the value of the housing allowance, visit www.mmbb.org/housing-allowance.

Signatures are required for both applicant and employer. Missing signatures can cause a delay in processing your application.

Consequences of Underreporting Income

Retirement savings contributions and death and disability benefits are based on reported compensation. Underreporting income, or failing to report increases in compensation, will result in lower benefits to the member and his or her family.

Here is an example for Rev. Jones, for whom the monthly Comprehensive Plan premium is 16% of reported compensation:

Reported Compensation			
Component	Full Amount: \$40,000	Reported Amount: \$35,000	Impact
Premium	\$6,400/yr.	\$5,600	Church pays \$800/yr. less
Contribution to Retirement Plan	\$5,200/yr.	\$4,550/yr.	Rev. Jones receives \$650/yr. less for retirement
Disability Income	\$26,668/yr.	\$23,334/yr.	Rev. Jones' benefit reduced by \$3,334/yr.
Death Benefit*	\$200,000	\$175,000	\$25,000 less for Rev. Jones' family

*Members qualify for one-third of the death benefit in the first year of eligibility and two-thirds in the second year. This example assumes that the member has been enrolled for at least two full years.

In the above example, underreporting Rev. Jones' annual income by \$5,000 reduces his organization's premium payments by \$800 a year. But the impact on Rev. Jones is potentially much greater than that—\$650 less contributed to Rev. Jones' retirement account and thousands of dollars less should Rev. Jones become disabled or die.

Your pastoral leaders deserve the full benefits for which they are eligible, so provide a full and accurate report of their compensation.

See page 19 for instructions on how to report compensation changes.

Calculating Compensation

A member's reported compensation is used to determine monthly premiums and annual retirement plan contribution limits.

Compensation includes:

- Cash salary, including amounts you withhold for employee contributions to the Member Contribution.
- The fair rental value of a parsonage, plus utilities and a parsonage allowance, or any cash housing allowance.
- If your church pays its minister a Social Security/Medicare tax offset, you may include this amount when reporting compensation for plan purposes. Your monthly premium will increase modestly as a result—but so will the minister's death benefit and disability coverage.

When Comprehensive Plan Coverage Begins

If the employee is hired and MMBB has received the premium payment within the first five days of the same month, the employee will be covered in the Comprehensive Plan (including disability and death benefits) for the entire month. If the employee is hired after that point, the employee will appear on the next month's invoice and coverage will begin on the first of the next month. For example, an employee who is hired April 2 whose premium MMBB has received, will be covered for the entire month of April. An employee hired April 21 whose premium has been paid, will be covered starting on May 1.

Contribution Options for the Retirement Only Plan

A variety of design options are available for the Retirement Only Plan:

- Membership Application (Form A-1) allows your church or ministry to contribute a fixed dollar amount each month—or a fixed percentage of the employee's compensation.
- Alternatively, you can make periodic (e.g., quarterly, annual) contributions. These *will* not appear on your monthly invoice. The process for making periodic contributions is on page 17.
- Vesting and matching options are also available. You specify these options when you sign an adoption agreement for the Retirement Only Plan. Contact MMBB if you need more information or wish to add or revise these options.

Housing Allowance

When designating a housing allowance for the upcoming year, ordained clergy need to keep in mind that a large housing allowance limits the amount they can save for retirement. If a minister's income is substantially reduced due to the housing allowance, it decreases the available amount of cash that can be contributed on an employee's behalf.

If you would like to learn more, please visit www.mmbb.org/church-finance/housing-allowance.

Enrollment in the Member Contribution Plan

Step 1 – Board of Trustees Adopts a Resolution

Before an employee completes a Membership Application for the Member Contribution Plan, your board of trustees must adopt a resolution authorizing you to modify employee salaries for the purpose of pre-tax retirement contributions. See below for suggested wording. Approval of the resolution must be reflected in the board's minutes.

Resolution Authorizing Salary Modification

WHEREAS, Section 403(b) of the Internal Revenue Code permits _____(employer) to purchase annuity retirement benefits for its employees on a tax-deferred basis, and the employer wishes to cooperate with and assist its employees in obtaining such benefits; now, therefore, be it RESOLVED, that upon receipt of written request from employees, the officers of _____ (employer) be, and they hereby are, authorized to make such modifications in the terms of compensation of such employees and to take such further action as in their judgment shall be appropriate and desirable in order to enable such employees to receive annuity retirement benefits and obtain the benefits of Section 403(b) of the Internal Revenue Code.

Signature_____

Date_____

(Church Officer)

Step 2 – Employee Signs a Salary Reduction Agreement (Form A-13a)

The Membership Application for the Member Contribution Plan must be accompanied by a signed Salary Reduction Agreement (Form A-13a). *Any amounts withheld before this agreement is signed will not be accepted.*

To download a Salary Reduction Agreement, visit www.mmbb.org/sra.

Submit this form during the month before the pay period in which the employee would like to have the money withheld. Example: Your payroll period is every two weeks and the member wants member contributions to start during the February 5-19 pay period. In order for the withholding to be treated as a pre-tax member contribution, MMBB must receive a properly filled out and signed Salary Reduction Agreement by the end of the previous month.

Sample Salary Reduction Agreement (Form A-13a)

The form is titled "MMBB THE ANNUITY SUPPLEMENT (TAS) SALARY REDUCTION AGREEMENT A-13a". It includes sections for Employee Information, Salary Reduction Agreement, Contribution, Terms and Conditions, and signature lines for both employee and employer representative. At the bottom, it provides contact information for The Ministers and Missionaries Benefit Board and indicates that the form is in triplicate (Top Copy - MMBB, Middle Copy - EMPLOYER, Bottom Copy - MEMBER).

Whenever an employee wishes to change their member contribution amount, they must submit a new Salary Reduction Agreement.

Specify the dollar amount or salary percentage of the monthly contribution, as well as the effective date for salary reductions.

Both the employee and employer must sign and date the form.

Email completed application form to Forms@mmbb.org or mail it to:
MMBB Financial Services
475 Riverside Drive, Suite 1700
New York, NY 10115-0049

The form is in triplicate. Separate the copies and mail the top copy to MMBB. Keep one copy on file and give a copy to the employee. If you download the form, you will need to make three copies.

Determine the Allowable Contribution to the Member Contribution Plan

The IRS sets the annual limit on how much an employee can contribute to their account on both a pre-tax and after-tax basis. Before submitting a Salary Reduction Agreement, have your employee call MMBB at **800.986.6222** and request a calculation of the maximum allowable employee and employer contribution. The employee should have the following information:

- Cash salary, including any amounts currently withheld for the Member Contribution Plan.
- The fair rental value of a parsonage, plus utilities and a parsonage allowance, or any cash housing allowance.
- Amount of Social Security/Medicare tax offset. This is particularly important if the pastor's housing allowance represents a sizable portion of their compensation. *The value of the housing allowance is excluded from taxable compensation when calculating the maximum allowable contribution. This has the effect of reducing the amount a minister can contribute to their retirement savings.*

Member Contribution Plan Salary Reduction Agreements remain in effect until:

- MMBB is notified of the member’s desire to terminate the agreement (employers cannot terminate these agreements without the member’s written consent).
- Termination of employment.
- There is a new Salary Reduction Agreement.
- The total amount of member contributions exceeds the IRS limit (MMBB will resume billing for the Member Contribution Plan at the start of the following year, based on the most recent Salary Reduction Agreement on file.)

The Member Contribution Plan for Self-Employed Ministers

A minister who is treated as self-employed for federal income tax purposes can still contribute to the Member Contribution Plan. They must have an Adoption Agreement on file with MMBB formally adopting the plan before they begin making contributions. The minister should sign a Membership Application (Form A-1) as both the “employee” and “employer.”

For these contributions to be tax deductible, the self-employed minister must make them directly to MMBB (i.e., not via a Salary Reduction Agreement). If MMBB bills you, the employer, for these contributions, they must be treated as taxable income.

3 Premium Payment

MMBB mails all invoices on the first business day of each month. Your invoice lists the premium for each employee and each plan in which the employee participates.

Please review your invoice carefully (see sample below). If you have any questions about your invoice, email billing@mmbb.org. Be sure to include your employer account number from the invoice.

Sample MMBB Premium Invoice

Account Number
Include this in all communications with MMBB.

Member ID
A unique identifier to be used when contacting MMBB.

Retirement Only Plan
Employer contributions.

Comprehensive Plan
Employer-paid premiums for retirement, death and disability benefits.

Plan Participation
A dollar amount in one of the columns listed above indicates that the member participates in this plan.

Compensation
Dollar amount reported by you, the employer.

Payment Coupon
A payment coupon should accompany all payments. Make sure this shows through the window of the return payment envelope. Use this address for premium payments only, not forms or correspondence.

Pay online
To pay your invoice online, please go to www.mmbb.org and click the Log In button.

Pay by phone
To pay your invoice by phone, please call **800.986.6222** and have your five digit account number available.

Pay by mail
To pay by mail, follow the instructions on the sample premium invoice form.

Sample Invoice Details:

Table 1: Summary

Name	Account Number	Period Covered	Invoice Number

Table 2: Financial Summary

Previous Balance	Payment Received	Other Credits/Debits	Current Premium	Amount Due

Table 3: Member Details

Member Name	Member ID	Compensation	Member Contribution Plan Pre-Tax	Member Contribution Plan Post-Tax	Retirement Only Plan	Comprehensive Plan	Tot

Payment Coupon Section:

TEAR HERE | MMBB • 475 RIVERSIDE DRIVE, SUITE 1700, NEW YORK, NY 10115-0049 • 800.986.6222 | TEAR HERE

Due Date: _____ **Amount Due:** _____

Three Ways to Pay Your Invoice:

- To pay online, go to www.mmbb.org/payments
- To pay by phone, call 800.986.6222
- To pay by mail, return this portion of the invoice with your payment to the address below.

Additional Instructions:

- Make check payable to "MMBB"
- Put your account number on the check
- Do not include any correspondence

Payments received after the end of the month will be posted on your next invoice.

MMBB Financial Services
PO BOX 121142, DEPT. 1142
DALLAS, TX 75312-1142

If you are withholding money from your employee’s paycheck for their own retirement savings on a tax-deferred basis, you **must** have a properly executed Salary Reduction Agreement on file with MMBB.

Paying the invoice online

To pay online, visit mmbb.org and click the Log In button. Have your five digit account number available.

Paying the invoice by phone

To pay by phone, call **800.986.6222** and have your five digit account number available.

When and where to mail payments

When paying the monthly MMBB invoice:

- Include your employer account number on the check.
- Use the provided envelope to mail your check, together with the payment coupon, to the address on your invoice:

MMBB Financial Services

P.O. Box 121142, Dept. 1142
Dallas, TX 75312-1142

Only *premium payments* should be mailed to this address. Do not include correspondence or application forms.

Remit your premium payments and retirement plan contributions as soon as possible.

To comply with IRS requirements, MMBB must receive your payment *no later than the 15th day of the month following the month covered by the invoice*. For example, if MMBB mails your invoice on February 1 for the month of February, you must mail the requested payment no later than the 15th day of the following month, March 15.

Periodic Contributions to the Retirement Only Plan

Your organization can make periodic, non-scheduled contributions to the Retirement Only Plan:

- Review the scheduled contributions for all retirement plans in which the employee participates. Make sure this one-time contribution will not take the employee over the allowable annual limit. If you are in doubt, contact MMBB at **800.986.6222** and request a calculation of the maximum allowable employee and employer contribution.
- Make your check payable to MMBB. Include your organization's employer number on the memo line.
- Include an A-13b form. Form can be obtained via www.mmbb.org in the Financial Resource Center's Forms section.
- Mail your check and letter to:
MMBB Financial Services
475 Riverside Drive, Suite 1700
New York, NY 10115-0049

Late Payments

Comprehensive Plan

If MMBB does not receive your Comprehensive Plan premium payment by the end of the third month following the month for which the premium was due, we terminate the member's coverage for death and disability benefits. For example, if the premium payment for January is not paid by the end of March, we terminate the member's coverage on April 1 and inactivate his or her membership. An inactive member has neither death benefits nor disability coverage.

Reinstating Comprehensive Plan Coverage

An inactive member who wishes to restore coverage and have premiums paid again must be reinstated. To **reinstate** that member, simply notify MMBB. If the inactivation has been longer than six months, the member must re-enroll.

Reinstatement restarts the phase-in period for the death benefit. The member qualifies for just one-third of the death benefit the first year and two-thirds in the second, a significant decrease.

Reinstatement can be avoided by **reactivating** the member's coverage and making all delinquent payments within six months of the inactivation date. MMBB will reverse the inactivation, provided that the total amount due from the time of inactivation through the current month's premium is paid. Death and disability coverage will resume at previous levels. Reactivation of a member's coverage avoids interruption of benefits. Reactivations and reinstatements cannot be processed after a member's death.

Retirement Only Plan

MMBB will notify you and the member in writing when payments are late. After three months of nonpayment, the member's account will be inactivated.

The Member Contribution Plan

403(b) regulations require that funds withheld from an employee's pay must be deposited to the member's account in a timely manner. MMBB defines this as no later than the 15th day of the month subsequent to the month covered by the invoice. For example if the contribution is for January, we must receive it by February 15th. Employers who do not send employee contributions to MMBB in a timely manner are failing to fulfill their fiduciary responsibility as defined by the Internal Revenue Service (IRS). Continued late payments constitute noncompliance with these regulations and could result in fines and penalties.

4 Report Changes to MMBB

As administrator of the MMBB benefits program, you are responsible for reporting changes to compensation, Member Contribution Plan changes and employment status changes.

Compensation Changes

Report any compensation changes to MMBB as soon as they are approved. They affect the member's death and disability benefits, as well as retirement plan contribution premiums and limits. (To fully appreciate the impact of underreporting, see the example on page 9.) Submit a **Compensation Change Request (Form A-18)** whenever any of the following changes occur:

- Cash salary, including amounts you withhold for the Member Contribution Plan
- The fair rental value of a parsonage, plus utilities and a parsonage allowance
- Housing allowance
- Social Security/Medicare tax offset

To download the compensation change request form, visit the Forms page at www.mmbb.org/forms.

Please read the form carefully before submitting it. Please note only an authorized person of the church can fill out this form. Incomplete forms delay the processing of your request.

Email the completed form to **Forms@mmbb.org**, or mail it to:

MMBB Financial Services
475 Riverside Drive, Suite 1700
New York, NY 10115-0049

Changes received by the 15th of the month generally appear on the following month's invoice. For example, if MMBB is notified of a compensation increase by January 15th, your February invoice will reflect this change.

Compensation Changes Can Be Reported Retroactively

If you discover that you have underreported the compensation of a member, you can still report the error so that the member receives the full retirement plan contributions to which they are entitled. Death and disability coverage cannot be increased retroactively.

Your church must provide documentation of the member's actual compensation for the time period and make the additional premium payments that would have been owed. MMBB will invest the additional payments entirely in the member's retirement account at the time it is received.

Contact MMBB at **800.986.6222** for information and a calculation of contribution limits for the member.

Member Contribution Plan Changes

Changing Member Contribution Plan Amounts

Employees can suspend or change the amount of their salary withheld for the Member Contribution Plan as often as they want. (At the very least, you should encourage them to increase their contributions whenever they experience an increase in compensation.)

To change a fixed contribution amount, submit a new Salary Reduction Agreement (Form A-13a). To download the form, go to www.mmbb.org/forms.

The contribution change takes effect after MMBB receives a properly executed Salary Reduction Agreement. The change only applies going forward. Under IRS regulations, you as the employer cannot make retroactive salary reductions.

If the employee elected to contribute a percentage of their compensation to the Member Contribution Plan, no revised agreement is necessary to keep up with salary increases. MMBB's billing to the plan will automatically change after you report the salary increase.

Suspending the Member Contribution Plan

To suspend contributions to the Member Contribution Plan temporarily, an employee must submit a new Salary Reduction Agreement (Form A-13a) showing the contribution amount as zero. Download this form by going to www.mmbb.org/forms.

Both you as the employer and the employee must sign the Salary Reduction Agreement (Form A-13a). The organization should stop withholding contributions immediately. Once the form is complete it should be emailed to Forms@mmbb.org or mailed to

MMBB Financial Services

475 Riverside Drive, Suite 1700
New York, NY 10115-0049

When the employee wishes to resume contributions to this plan, they must complete a new Salary Reduction Agreement.

Ending Contributions to the Member Contribution Plan

Employees wishing to end participation in the Member Contribution Plan, must complete a new Salary Reduction Agreement (Form A-13a) showing the effective date and change the contribution amount to zero. As the employer, you should sign the new Salary Reduction Agreement and email it to Forms@mmbb.org or forward it to:

MMBB Financial Services

475 Riverside Drive, Suite 1700
New York, NY 10115-0049

Employment Changes

Retirement

Notify MMBB at least 60 days before the employee's intended date of retirement. To ensure that the final premium payment is included in the member's annuity, mail it no later than the 15th of the month prior to the retirement date.

Employment Ends

When a member's employment ends, notify MMBB immediately. You are responsible for paying the Comprehensive Plan premiums for the full month, even if employment ends before the last day of the month. Make sure you forward the member contribution to MMBB for the final pay period.

Notify MMBB of the last month for which you will pay the premium for the employee who is leaving.

Please note: If you continue to make payments to the account of a terminated employee, MMBB cannot return those contributions to you. At your direction, the funds will be removed from the terminated employee's account and placed on account for future contributions to that plan for your employees.

Employees Should Report Personal Changes Directly to MMBB

Your employees should contact MMBB directly to report changes in their personal information, including:

- Change of address, telephone or email
- Change in marital status

Instruct your employees to call MMBB at **800.986.6222** or email **service@mmbb.org**.

Change of beneficiaries involves using an online form that you can find at www.mmbb.org/forms.

Employment Status

If employment status should change from part-time to full-time or if employment hours should decrease, please notify MMBB so adjustments can be made accordingly.

5 Tax Reporting

Which tax reporting form should I use?

Ministers have a dual tax status. For federal reporting purposes they are considered employees, but for Social Security they are considered to be self-employed with regard to services performed in the exercise of ministry. The IRS instructs employers to use Form W-2 to report an employee's taxable income from a church, not Form 1099-MISC.

- Form 1099-MISC is for self-employed workers. Ministers are considered self-employed for Social Security/Medicare tax purposes only, **not** for federal income tax purposes.
- If you use Form 1099-MISC, employer premiums paid for benefits, including benefit plans administered by MMBB, must be reported as taxable income.
- The employee's chances of being audited increase dramatically when Form 1099-MISC is used.

To Avoid Taxation of Expense Reimbursements, Adopt an Accountable Plan

You reimburse your employees for work-related expenses. How can you keep those payments from being taxed as additional income? Adopt an "accountable reimbursement plan" that follows IRS rules.

An accountable plan requires employees to substantiate each business-related expense. They must also return to you any advanced funds that were in excess of the actual expense.

Your board of trustees must pass a resolution defining the criteria for ministry-related expenses. For more information, visit www.mmbb.org/gtnpc to access the "Guide to Negotiating Pastor Compensation."

Boxes 2 to 6 (Federal income tax/Social Security tax withheld)

- List the tax amounts withheld for lay employees.
- For ordained staff, leave blank.
- If your minister has arranged for voluntary withholding of federal income tax, include the amount of withholding in Box 2.
- For clergy not treated as self-employed for federal tax purposes, include contributions to the Member Contribution Plan in Boxes 3 and 5.

Box 12a, b, c, d

This is a sample of the most commonly used codes. There are additional codes for different types of medical reimbursements.

For additional information and codes you may refer to "Federal Reporting Requirements for Churches" as published by MMBB. Visit www.mmbb.org/frffc to access the publication.

For each form of reported compensation, write the appropriate letter in the "Code" column and then enter the dollar amount.

- C Include "imputed income" equal to the annual cost of employer-provided group term life insurance in excess of \$50,000 (see page 28 for how to calculate this amount).
- E Include all amounts deferred via the Member Contribution Plan or any other 403(b) Salary Reduction Agreement.
- L If your church reimburses the employee under an accountable plan in excess of the standard IRS mileage or per diem rates, enter the portion of reimbursement that is equal to the amount allowed by the appropriate IRS rate. Do not include allowance reimbursement in Box 1 if the total is less than, or equal to, the amounts of the IRS mileage or per diem rate.

Box 13 (Statutory employee/Retirement plan/Third-party sick pay)

Check "Retirement Plan" for members of the Comprehensive Plan, Retirement Only Plan or the Member Contribution Plan.

Box 14 (Other)

This box is informational. You have the option of using it to report the amounts of the housing allowance, parsonage rental value and/or utilities allowance.

Calculating Imputed Income for Death Benefit

The annual cost of employer-provided death benefit protection in amounts over \$50,000 is considered imputed income by the IRS. This income is taxable to the employee and it must be reported to the IRS in Section 12 of Form W-2. Here's how to calculate the amount for the life insurance portion of the Comprehensive Plan.

1. Member's age: (a) _____
2. Member's annual compensation: (b) _____
3. Member's death benefit: (c) _____
(use table at lower right)
4. Death benefit: (c) _____ minus \$50,000 equals (d) _____
(death benefit in step 3) (excess death benefit)
5. (d) _____ divided by \$1,000 equals (e) _____
(excess death benefit in step 4) (excess death benefit in thousands)
6. (e) _____ multiplied by (f) _____ equals (g) _____
(excess death benefit in thousands from step 5) (cost from IRS table below) (monthly cost of excess benefit amount)
7. (g) _____ multiplied by 12* equals (h) _____
(monthly cost of excess benefit amount) (imputed income or annual cost of excess benefit amount)

IRS Cost Table	
Age Bracket	Cost per \$1,000 of Protection for One Month
Under age 25	\$.05
Age 25-29	.06
Age 30-34	.08
Age 35-39	.09
Age 40-44	.10
Age 45-49	.15
Age 50-54	.23
Age 55-59	.43
Age 60-64	.66
Age 65-69	1.27
Age 70 and above	2.06

MMBB Death Benefit	
Age Bracket	Annual compensation
Through age 40	5x annual compensation
Age 41 through 50	4x annual compensation
Age 51 through 60	3x annual compensation
Age 61 through 65	2x annual compensation
Age 66 to retirement	1.5x annual compensation

*Adjust this multiplier if calculating for an employment period of less than one year.

6 Key Deadlines

At the end of the year, review your staff compensation and benefits program. This is also a good time to review your tax reporting responsibilities.

- If your church provides a parsonage, review the fair rental value and report any increase to MMBB so that Comprehensive Plan premiums and benefits will be accurate.
- Review last year's accountable plan for ministry-related expenses and adjust as needed to ensure that the expense allowance is adequate.
- Provide Copies B, C and 2 of Form W-2 to employees by **Friday, January 31, 2021.**
- File Copy A of Form W-2 with the Social Security Administration by **Friday, January 31, 2021.**
- Check to see that you, the employer, have an MMBB plan document and Adoption Agreement for each plan in which you participate. If not, contact MMBB.
- Reconcile the amount of contributions withheld from an employee's pay for the Member Contribution Plan with the actual amount billed by MMBB. Be sure there is no discrepancy between the employee's tax record and what was submitted on their behalf.

Helpful Resources

Documents and resources available free of charge from MMBB.org

- *Clergy Tax Return Preparation Guide* by Richard R. Hammar (updated annually). Visit www.mmbb.org/resources?category=2818 to access the publication
- *Federal Reporting Requirements for Churches* by Richard R. Hammar (updated annually). Visit www.mmbb.org/resources?category=2818 to access the publication
- *Guide to Negotiating Pastor Compensation*. Visit www.mmbb.org/church-finance/clergy-compensation/components-of-compensation to access the publication

Documents and resources available free of charge from the Internal Revenue Service

Search on www.irs.gov, or call **800.829.3676**.

- Publication 517: *Social Security and Other Information for Members of the Clergy and Religious Workers*
- Circular E: *Employer's Tax Guide*
- Publication 17: *Your Federal Income Tax for Individuals*
- Publication 463: *Travel, Entertainment Gift and Car Expenses* (for guidance on accountable plans for ministry-related expenses)

Resources available for purchase

Visit store.churchlawandtax.com/2019-church-clergy-tax-guide, or call **1-877-247-4787**.

- *Church and Clergy Tax Guide* by Richard R. Hammar

See more helpful resources below, including information about outsourcing financial management and consequences when churches fail to appropriately administer payroll taxes.

When Churches Fail to Appropriately Administer Payroll Taxes

The failure of churches to file payroll taxes on time is a common issue. This is a significant problem for churches that lack sufficient internal controls over the administration of payroll taxes. Churches should establish checkpoints to assure that payroll taxes have been paid accurately and in a timely manner. Churches that fail to withhold and properly remit payroll taxes for lay church workers (and in some cases ministers) can incur substantial penalties and interest. If the church does not have staff or volunteers that can manage the administration of payroll, then they should seek a reputable payroll processing company to handle this task. Good payroll companies typically maintain current knowledge on changes in tax law that may impact the church. This can help mitigate risk to your organization.

Portions of this article are excerpted from the April 2019 issue of Church Finance Today.

What You Should Consider When Outsourcing Financial Management

Does the firm:

- demonstrate a commitment to and an understanding of the church community?
- understand the unique characteristics of clergy payroll administration and related taxes?
- have adequate resources to service your church's financial affairs?
- display thought leadership that will help the church improve its financial management?
- appropriately use technology to create greater efficiencies for your church?
- maintain professional liability insurance in case of errors and omissions?



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