



August 1, 2013

## **ACA Exchange Notice Requirement—Template Form Helpful Hints for Local Churches and SPUs**

The following is a guide to assist local churches and other salary-paying units (SPUs) in The United Methodist Church with providing the required Exchange Notice under the Affordable Care Act (ACA) to their employees. This Notice describes the new Health Insurance Marketplaces (previously called “Exchanges”). The Department of Labor (DOL) has released two template forms for employers to rely upon in fulfilling this requirement:

- **Notice for employers that offer a health plan to some or all of its employees:** available **here** or online at **[www.dol.gov/ebsa/pdf/FLSAwithplans.pdf](http://www.dol.gov/ebsa/pdf/FLSAwithplans.pdf)**.
  - An MS Word version is available **here** (**[www.dol.gov/ebsa/FLSAwithplans.doc](http://www.dol.gov/ebsa/FLSAwithplans.doc)**).
  - A Spanish version is available **here** (**[www.dol.gov/ebsa/pdf/FLSAwithplanssp.pdf](http://www.dol.gov/ebsa/pdf/FLSAwithplanssp.pdf)**).
- **Notice for employers that do not offer a health plan:** available **here** or online at **[www.dol.gov/ebsa/pdf/FLSAwithoutplans.pdf](http://www.dol.gov/ebsa/pdf/FLSAwithoutplans.pdf)**.
  - An MS Word version is available **here** (**[www.dol.gov/ebsa/FLSAwithoutplans.doc](http://www.dol.gov/ebsa/FLSAwithoutplans.doc)**).
  - A Spanish version is available **here** (**[www.dol.gov/ebsa/pdf/FLSAwithoutplanssp.pdf](http://www.dol.gov/ebsa/pdf/FLSAwithoutplanssp.pdf)**).

Churches that provide coverage to clergy and not lay employees should use the form for employers that offer coverage to some employees. Employers that offer coverage must use the “Notice for employers that offer a health plan” (linked above)—even if all employees decline that coverage. Employers should modify the template with certain information as described below regarding the employer and, if applicable, its health plan.

### **Completing the Notice Template Form—Employers Not Offering Health Coverage**

#### **Part B: Information About Health Coverage Offered by Your Employer**

- Box 3: Enter the full name of the local church or other SPU.
- Box 4: Enter the employer identification number (EIN) or taxpayer identification number (TIN) of the local church/SPU. If the local church shares an EIN or TIN with another employer, such as a day care center, the local church may need to coordinate distribution of this Notice with that affiliated employer.
- Box 5: Enter the street address of the local church/SPU.
- Box 6: Enter the main telephone number of the local church/SPU.
- Boxes 7, 8, 9: Enter the city, state and ZIP code of the local church/SPU.
- Box 10: Enter the name of the officer or employee at the local church/SPU whom the Health Insurance Marketplace (the “Exchange”) should contact with questions. (For local churches that may not have anyone readily available to address benefits questions, enter the name of the conference benefits office personnel member.)
- Box 11: Enter the telephone number (the direct line) for the person or position named in question 10.
- Box 12: Enter the e-mail address for the person or position named in question 10.

## Completing the Notice Template Form—Employers Offering Health Coverage to Some Employees (including clergypersons under appointment)

### Part B: Information About Health Coverage Offered by Your Employer

- Boxes 3-12: Follow the instructions in part I. above.

Completing the section after question 12:

- Answer the questions about the health plan offered by the local church/SPU. For example, indicate which employees are eligible for the plan. This may include only the appointed clergyperson or may also include lay employees. It also may include only full-time or some part-time employees.
- Indicate whether or not the plan offers coverage to dependents of the eligible employees. If coverage is offered to dependents, describe eligible dependents (i.e., spouse, children) in the space provided.
- *Last box on the page 2:* Check this box if the health plan offered meets the “minimum value” requirement under the ACA. This means that the plan is expected to cover at least 60% of the cost of claims (in other words, the plan has a 60% actuarial value).
  - If your church or SPU offers coverage through an annual conference plan that is part of HealthFlex, you can check the box indicating the plan provides minimum value.
  - If your church or SPU offers coverage through an annual conference plan (other than HealthFlex), it most likely does satisfy minimum value. However, you should confirm minimum value with your annual conference office.
  - If your church or SPU offers coverage through an insurance company, you should check with the issuer about minimum value.

*Questions 13 through 16 are optional.* The local church is not required to complete them before giving the Notice to employees. The Notice does not need to be customized to each employee. However questions 13-16 correspond to questions that employees must answer in their application for coverage through the Marketplace. Therefore, completing questions 13-16 on this Notice may help your employees understand and obtain coverage through the Marketplace where applicable. Suggested answers are below:

- 13: Indicate whether the employee is currently eligible for the local church’s/SPU’s health plan, or whether a waiting period applies.
- 14: Indicate whether the plan provides minimum value (see above for more about minimum value).
- 15: Indicate the premium that the employee has to pay for coverage (this is the portion of the underlying premium paid to the annual conference or insurance company that the employee himself or herself is responsible for paying), and the applicable frequency (monthly, weekly, etc.) that the premium is paid.
- 16: If the local church/SPU intends to cease offering coverage soon or will make changes to the plan or the premiums soon, indicate so here.

### More About the ACA Marketplace and Other ACA Requirements

The Center for Health monitors the ACA reform and provides applicable information for annual conferences, local churches and other UMC employers, as well as information for individuals employed through The United Methodist Church. However, your conference office should be your first point of contact for more detailed information about Notice requirements. We encourage you to check the Center for Health’s **health care reform web page** at [www.gbophb.org/health\\_welfare/healthcarereform/index.asp](http://www.gbophb.org/health_welfare/healthcarereform/index.asp) frequently for general updates.

### Questions and Information

If you have questions or would like additional information, please send your inquiries to [healthcarereform@gbophb.org](mailto:healthcarereform@gbophb.org). General information about health care reform is available from the federal government at [www.healthcare.gov](http://www.healthcare.gov).

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