MEMORANDUM

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| To: | Church Employers of the West Virginia Annual Conference United Methodist Family Employee Medical and Dental Benefit Plan |
| RE:  Date: | Medicare Secondary Payer Small Employer Exception - Application For Exception  09/14/2020 |
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The West Virginia Annual Conference United Methodist Family Employee Medical and Dental Benefit Plan (the “Plan”) has been amended to include a provision adding the Small Employer Exception to the Medicare Secondary Payer Act effective as of January 1, 2021, copy attached. Under this provision, Medicare would be the primary payer for benefits incurred by Plan Beneficiaries (active employees and spouses) who are age 65 or older participating in the Plan through a Church approved for the Exception. **All Church Participants (Church/Employer) participating in the Plan who have fewer than twenty (20) full and/or part-time employees are required to complete the attached Exception application in order to continue participation in the Plan.** If the Church Participant is approved for the Exception, Medicare will become the primary payer for benefits incurred by these eligible working-aged individuals and the Plan will become the secondary payer.

**Highlights of the Small Employer Exception Application Process** (Full CMS instruction package attached.)

1. Complete the requested Employer information on the **Small Employer Exception Submittal Certification** tocertify that your church has less than 20 employees (full and/or part-time employees combined) regardless of whether enrolled in the Plan. Sign where indicated as the Employer Representative using the effective date of 01/01/2021. The Treasurer will sign and submit the application as the Submitter’s Representative on behalf of the Plan.
2. Complete the **Small Employer Exception (SEE) Request** application for the new Exception for your working-aged employees and spouses aged 65 and over. Complete the **Table 3** spreadsheet in item 3 below and attach it to this request. Going forward, this form and spreadsheet is used to request an Exception for additional working-aged employees and/or their spouses as they reach age 65, or to request a change or update to a previously approved SEE.
3. Complete the **Table 3: Request for Exception for Working Aged Individuals and Spouses Aged 65 and Over Details** to individually identify each eligible Beneficiary (employee and/or spouse) participating in the Plan through your church. Attach it to your application, but do not sign it. The Treasurer will sign and submit the application as the Submitter’s Representative on behalf of the Plan.

If you have any questions regarding completing these documents, contact Jamion Wolford or Kathy Damron at (304)344-8331. **Please return the completed certification, application and detail to the Treasurer’s Office no later than November 2, 2020 at the following address.** Upon approval of the Exception, the Plan will notify each Church and their Medicare beneficiaries in writing of the date Medicare will become the primary payer and when the Plan will become secondary to Medicare.

**Pension Funds, Inc.**

Attn: Kathy Damron

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