Group-Term Life Insurance
2021 “Imputed Income”
Instructions for tax reporting and payments.

Summary
To assist with your ministry’s tax reporting needs, you will receive monthly Group-Term Life Reports that include new hires, transfers and members with life events that result in a change to their Group-Term Life coverage under the Concordia Disability and Survivor Plan. The report displays “Start” and “End” dates for mid-year changes in Group-Term Life coverage. These monthly reports will display changes only; however, you can expect to receive a comprehensive report at the end of the year.

For additional details and instructions, please visit ConcordiaPlans.org/GTL.

The information provided in these reports applies to the 2021 tax year.

Why am I receiving this mailing?
The Concordia Disability and Survivor Plan pays benefits upon the death of an enrolled worker or an enrolled dependent. These potentially payable benefits are the equivalent of group-term life insurance. As a result, the IRS requires that the ‘value’ of these benefits be included in employee income in the current taxable year. This ‘value’ is called ‘imputed income.’ Imputed income is also subject to Social Security taxes (FICA or SECA). The IRS excludes the first $50,000 of GTL benefits from imputed income.

The monthly Group-Term Life Report lists all enrolled workers along with their respective imputed income and FICA or SECA tax amounts. If any enrolled workers experience a life event resulting in a change in the amount of their CDSP death benefits, an updated report will be issued in the following month highlighting these changes.

Please note that the report reflects monthly totals; annual amounts must be calculated by the employer for each worker.

If the dollar amount reflected in Column A is $0, no reporting is required for that worker during the respective Start to End time frame. Some reasons why a $0 amount may show in Column A include if the worker’s death benefit does not exceed $50,000 and the worker has no enrolled dependents, or if the worker has no taxable income.

Workers
An employer is required to pay FICA tax on imputed income equal to 7.65% of the amount in Column A multiplied by the number of months between the Start and End dates. An employer should withhold from each employee’s salary the amount in Column C multiplied by the number of months between the Start and End dates. The withholding of FICA tax for GTL coverage should be included with normal withholdings for an employee’s salary. For 2021, the employee’s FICA tax rate is 7.65%. The FICA amount can be withheld from the employee’s salary in a single payroll period or it may be withheld pro rata over multiple periods (e.g., weekly or bimonthly), depending on the method desired by the employer. An employer may also vary the withholding method for each employee, if desired.
If an employee terminates employment during 2021, any remaining FICA tax should be withheld from their final paycheck. Otherwise, the employer will be responsible for paying any uncollected portion of the employee’s additional FICA tax as well as the employer’s additional tax. CPS recommends withholding the appropriate amount of FICA tax for each member per pay period, to decrease the risk of needing to pay uncollected FICA taxes out-of-pocket should the worker cease employment.

CPS further recommends following regular procedures for tax depositing to remit both the employee’s and employer’s portions of FICA tax and any income tax voluntarily withheld. Such payments should not be sent to CPS.

Additional instructions on the CPS Group-Term Life Report can be found at ConcordiaPlans.org/GTL.

**Ministers of Religion**

Ministers of religion (ordained and commissioned) participating in Social Security are subject to SECA taxes. The SECA tax rate for 2021 is 15.3%. Such ministers should be instructed include GTL imputed income amounts when calculating his/her quarterly estimated tax payments. A minister of religion not participating in Social Security is not subject to SECA taxes. However, all ministers of religion should include the annual amount of GTL imputed income in total income for federal income tax purposes.

At the end of the year, all GTL imputed income should be included on the employee’s Form W-2, in the proper boxes with total compensation. All GTL FICA tax withheld should be included in the appropriate boxes (for Social Security and Medicare). Any additional GTL income tax withheld should be included in the total reported on the W-2. Consult the IRS “Instructions for Forms W-2 and W-3” to ensure accurate reporting of this information. Remember to include the additional gross income and related FICA withholding on quarterly 941 reports.