

## Strategies for Structuring Ministerial Compensation

A review of the patterns of ministerial compensation over several decades would indicate that significant changes have taken place. Gone are the days when ministers received a portion of their compensation in the form of food and clothing supplied by members of the congregation. The 1986 Tax Reform Act and subsequent IRS regulations had an impact on the finances of ministers. More recently, the Tax Cuts and Jobs Act of 2017 (TCJA) affects them as well.

The 1986 Tax Reform Act made it more difficult for ministers to avoid paying income taxes on unreimbursed business expenses. For example, unreimbursed automobile expenses could not be deducted dollar for dollar from compensation, but were included as a part of itemized deductions on Schedule A. With the 2018 tax year, the TCJA makes it impossible to use Schedule A for this purpose. With a high standard deduction allowance, many parsonage families find it impossible to itemize deductions. The result is the payment of more income tax for those ministers who cannot deduct unreimbursed automobile expenses.

The same problem applies to many of the business and professional expenses incurred in the exercise of ministry. In addition to the high standard deduction allowance, these expenses will no longer be deductible on Schedule A.

With this in mind, ministers need to reevaluate the structuring of their compensation.

### IRS Regulations for Business Expense Reimbursements

Requirements for business expense reimbursements are based on IRS Regulation 1.62-2(d)(3). These requirements apply to *every* church and affect *all* employees. They are not optional. They must be followed, or the church employee may pay significantly greater amounts of unnecessary taxes. **The IRS regulations** require that business reimbursements be included on Form W-2 as taxable income to the individual *unless* paid through an “accountable reimbursement plan” which has been “formally” adopted by the church board. The requirements for the accountable reimbursement plan are three-fold:

1. The church may reimburse only those business expenses that an employee substantiates within 60 days of the expenditure with receipts and/or in writing as to the date, amount, place, and business nature.
2. The employee must return any “excess” reimbursements (i.e., unused expense advances) within 120 days of the expenditure. The excess reimbursement may not be treated as a bonus or gift.
3. Any advance must be made within 30 days of when the expense is paid or incurred.



#### Caution!

Business reimbursements must be included on Form W-2 as taxable income unless they are paid through an “accountable reimbursement plan” which has been “formally” adopted by the church.



### Caution!

The IRS will not allow reimbursements to be paid through a retroactive reduction of W-2 salary.

**Form W-2 income** cannot simply be reduced “after-the-fact.” In other words, the IRS will not allow reimbursements to be paid through a retroactive reduction of salary. For reimbursements to be paid and qualify under an accountable reimbursement plan, properly substantiated expense reimbursements must be paid separately from the employee’s salary. The salary amount and the accountable reimbursement plan must be established in advance of payment. If the church establishes a dollar limit on the expense plan (instead of reimbursing 100 percent of expenses), any balance remaining in the expense plan at year-end should remain with the church. If the balance is paid to the employee, all other plan payments made to the employee during the year become reportable as taxable income on Form W-2.



### Remember!

The “cost of a minister” and the “cost of ministry” are two distinct concepts.

## The Cost of a Minister vs. The Cost of a Ministry

For too long, churches and ministers have lumped together into a single concept the “cost of a minister” and the “cost of a ministry.” These are actually two distinct concepts. For proper planning and church budgeting, they must be separated.

The “cost of a ministry” includes outlays related to the work of the minister and are properly a part of local church expenses. Among these are the expenditures that will be incurred without regard to which minister is serving the congregation at a particular time.

On the other hand, the “cost of a minister” relates to those items that are directly and indirectly related to compensating the particular minister serving the church at the current time. These expenses include the general categories of employee benefits and actual salary.

The *least* advantageous way for a minister to be paid is to be given a lump sum amount out of which he or she must provide for professional expenses, employee benefits, and cash salary. Unfortunately, in most situations where these are lumped together, both the local church and the minister assume that the total amount of the “package” is compensation. In reality, part is for the “cost of a ministry” and part is for the “cost of a minister.”



### Caution!

The least advantageous way to pay your minister is by the “lump sum” method.

## What Is the Cost of a Ministry?

The following list includes business and professional expenses that are identified with the “cost of a ministry.” They should be recognized and budgeted as local church expenses, *not* compensation.

When the minister is expected to pay for these items out of the amount provided in the church’s “package,” it will result in the parsonage family paying higher taxes on money they used to operate the local church’s ministry. However, when these items are “reimbursed” through an accountable reimbursement plan (even if it means dividing the minister’s previous “package” into two distinct amounts), it usually will result in lower taxes, a more accurate reflection of the minister’s real compensation, and a simpler tax return.

The cost of maintaining a ministry includes the following business and professional expense reimbursements:

- Automobile
- Continuing Education
- Conventions/Assemblies
- Hospitality
- Pastor’s Professional Library
- Dues to Professional Organizations
- Church Supplies (birthday cards, postage, etc.)



### Remember!

If a minister has to pay “cost of ministry” expenses out of a “salary package,” the parsonage family taxes will be higher than necessary.

## What Is the Cost of a Minister?

The “cost of a minister” is made up of appropriate employee benefits, provision for housing, and the actual cash salary paid.

Some of the items related to these are not discretionary since the minister and family have no choice as to how the money is spent. Items of a nondiscretionary nature include most of the employee benefits listed below. The list includes the type of basic employee benefits that should be provided in a well-balanced compensation plan:

- Social Security
- Nazarene 403(b) Retirement Savings Plan
- Health Insurance
- Dental Insurance
- Group Term Life Insurance
- Long-Term Disability Insurance
- Accidental Death & Dismemberment Insurance
- Cash Bonuses
- Paid Holidays
- Vacation

The “cost of a minister” also includes the provision for housing: a cash housing allowance, a parsonage plus utilities, or a combination of the two. Some churches provide a parsonage and utilities. In such cases, the minister has no discretion as to how that part of compensation will be spent. The minister cannot voluntarily choose to live in a less expensive home and thereby free up income to cover other personal needs. Also, the minister cannot build equity for retirement housing. The church board should recognize that when the minister leaves the church, a significant portion of the compensation that has been “paid” is left behind in the form of equity in the parsonage. Fortunately, many churches are now recognizing their obligation to assist the minister in preparing for retirement housing by depositing monthly amounts into the minister’s Nazarene 403(b) Retirement Savings Plan account on a tax-advantaged basis. This is an essential part of the compensation package. For more information on a minister’s housing, see Memo #1: *Housing For Your Pastor: Parsonage or Housing Allowance?* and Memo #13: *The Minister’s Housing Allowance*.

The remaining item in the “cost of a minister” is the cash salary. This is the amount the minister and family use to meet living expenses and with which they have some discretion in spending. Among the factors many church boards consider when determining their minister’s cash salary are: job requirements, professional qualifications, educational background, personal experience and expertise, socioeconomic factors affecting the pay scale in the local community, and such subjective factors as merit pay for a job well done. Cost of living adjustments should be considered in each annual salary review of all church employees.

## Structuring Ministerial Compensation

Ministers and churches are realizing the need to differentiate between the “cost of having a ministry” and the “cost of compensating a minister.” More and more churches are recognizing that their “package” approach does not provide nearly as much true cash salary as they had thought. They are making efforts to reimburse compensation above the “package” amount for business and professional expenses.

Other churches are financially unable to increase compensation above the amount committed to their “package.” However, they can still help the minister



### Idea!

Provide for your pastor’s retirement *and* retirement housing by contributing monthly to their Nazarene 403(b) Retirement Savings Plan account.



### See:

**Memo #1:** *Housing For Your Pastor: Parsonage or Housing Allowance?*

**Memo #13:** *The Minister’s Housing Allowance*



### Idea!

Allow your pastor to have two distinct expense categories to reduce potential taxes.

**See:**

**Memo #5:** *Minimizing Income Taxes for Church Employees*

**Memo #11:** *Auto and Other Business Expense Reimbursements*

by differentiating between these two kinds of costs and by allowing the minister to re-categorize the total amount provided by the church into these distinct expense categories. The result of this restructuring costs the church no additional funds, but provides a legitimate opportunity for the minister to reduce the potential impact of taxes. For more information see Memo #5: *Minimizing Income Taxes for Church Employees* and Memo #11: *Auto and Other Business Expense Reimbursements*.

The information contained in this memo series is of a general nature reflecting USA Nazarene Church polity. It is *not* offered as specific legal or tax “advice.” Each person, local church board, and district should evaluate their own unique situation in consultation with their local legal and tax advisors.