



Wespath

BENEFITS | INVESTMENTS

Wespath Benefits and Investments
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April 28, 2021

<FirstName LastName>
<Company (if appropriate)>
<Address>
<Address>
<City>, <State> <ZIP>

Re: Blue Cross Blue Shield Association Class-Action Lawsuit

Dear <FirstName LastName>:

Some HealthFlex participants recently received a postcard or e-mail regarding a settlement of class-action claims against the Blue Cross Blue Shield Association (BCBSA), which is the national association of 35 independent, locally-operated Blue Cross Blue Shield companies. Blue Cross Blue Shield of Illinois (BCBSIL), one of HealthFlex's third-party administrators, is a member of the BCBSA. The postcards and emails are ***not*** spam. Some HealthFlex participants are eligible to share in the settlement proceeds. Information about the lawsuit and what action HealthFlex participants might consider taking—including instructions to submit a claim—is in the Q&A below. More information about the settlement is available on the official settlement website at: www.BCBSsettlement.com.

Q: What does the lawsuit allege?

A: The class-action lawsuit alleges that BCBSA companies violated antitrust laws. Specifically, the lawsuit alleges that, from 2008 through 2020, BCBSA companies agreed to divide up the market for health care insurance and administration among themselves to avoid competing with each other, resulting in higher prices for individuals and employers.

Q: What is the proposed settlement?

A: The proposed settlement agreement includes a \$2.67 billion settlement fund—which will come out to approximately \$1.9 billion after deduction of attorneys' fees, administration expenses and other costs—and requires BCBSA companies to stop certain allegedly anticompetitive practices, such as agreeing to divide the market. The proposed settlement must be approved by the federal district court handling the lawsuit. The court is scheduled to hold a hearing on the fairness of the proposed settlement in October.

Q: Are HealthFlex participants eligible to share in the settlement proceeds?

A: Yes, some HealthFlex participants are eligible to share in the settlement proceeds. If you were enrolled in HealthFlex's BCBSIL network between September 1, 2015 and October 16, 2020, you are eligible to submit a claim to share in the settlement proceeds. (If you had other healthcare coverage that was insured or administered by a BCBSA company between February 7, 2008 and October 16, 2020 through a different employer or an individual insurance policy, you may be able to submit a claim

related to that coverage, as well.) Under the terms of the settlement, your spouse and dependents covered through HealthFlex are not eligible to receive a payment, so they should not submit a claim related to their HealthFlex coverage.

Claims for settlement proceeds must be submitted by November 5, 2021.

Q: Should I submit a claim?

A: If you submit a claim, you could receive a share of the settlement proceeds if you are eligible. At this point, it is unclear how much an individual would receive as the amount is dependent on several variables, including the total number of individuals and plans that submit claims. If the total payment for any individual is equal to or less than \$5.00, no payment will be made to him or her.

Please refer to the **FAQs** available on the settlement website for more information to consider in deciding whether to file a claim. The FAQs also address what happens if you elect to “opt out” of the settlement class or do nothing.

Q: I did not receive a postcard or email about the settlement. Can I still submit a claim?

A: Yes, you can still submit a claim if you are in the eligible class of participants described above. The settlement claim form asks for a “Unique ID” that was included on the postcard and email, but a claim can be filed without a Unique ID.

Q: I received a postcard or email about the settlement. Does that mean I am definitely eligible to share in the settlement proceeds?

A: No. Our understanding is that in an effort to get notice out as widely as possible, the settlement administrator may have sent postcards and emails regarding the settlement to individuals who are not actually eligible to share in the settlement proceeds.

Q: How do I submit a claim?

A: Claims can be submitted online on the settlement’s official website (www.BCBSsettlement.com). Alternatively, you may submit a paper claim form by mail. You can download a claim form from the settlement website or request a claim form by calling JND Legal Administration (the settlement’s court-appointed administrator) at 1-888-681-1142.

When completing the claim form online or by paper, be sure to have your HealthFlex insurance card handy, as you will need to include certain information from the card on the claim form. If you received a postcard or email, you will also need to include your “Unique ID” from it. When the claim form asks for “Health Plan Name,” please select or enter “Blue Cross Blue Shield of Illinois.” Also, please enter “Wespath Benefits and Investments (formerly General Board of Pension and Health Benefits of The UMC)” for the “Employer Name.” HealthFlex includes multiple employers within The United Methodist Church, but only Wespath is reflected as the plan sponsor in the records available to the settlement administrator. The fact that you are employed by a church, conference or different organization associated with the UMC will not impact your claim.

Q. Can HealthFlex or Wespath file a claim?

A: Self-funded group health plans, such as HealthFlex, are also eligible to submit a claim on behalf of the plan. Wespath likely will submit a claim on behalf of HealthFlex. This will not reduce the payment that HealthFlex participants who submit a claim will receive. However, the payment that HealthFlex receives will be reduced by any payments that HealthFlex participants receive.

Q: Will I receive additional communications about this lawsuit?

A: JND Legal Administration (the settlement's court-appointed administrator) has been directed by the court to manage a national communications campaign designed to help ensure that potential claimants are aware of the settlement and their right to file a claim. You may receive additional communications from them regarding the settlement.

Q: Who should I contact if I have additional questions?

A: You can either visit the settlement's official website (www.BCBSsettlement.com) or call JND Legal Administration (the settlement's court-appointed administrator) at 1-888-681-1142.

Sincerely,

Wespath Benefits and Investments

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