



Planning Consideration*

For many employers the data contained in the health benefits census has been relatively straightforward; name, m/f, date of birth, date of hire and zip code.

PPACA rules require that employers look at more than just those factors in determining compliance. Therefore, individuals or teams responsible for managing a company's health benefit program should consider additional categories depending on their unique circumstances. A suggested list is providing in the body of this section.

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Organizing Health Plan Eligibility

Employers will want to develop a census of all employees they will be required to offer health benefits to beginning in 2014.* Start with your current census of eligible employees using current definitions. From there, assemble a comprehensive list of all employees.

Depending on the nature of your job descriptions this could include:

- i.) Any employee working 30 + hours per week; including those who are not currently health benefit eligible
- ii.) Part-time employees (anyone who receives a W-2 wage statement, excluding full time seasonal employees who work less than 120 hours per year), based on the number of monthly hours worked divided by 120
- iii.) Seasonal employees – Those employees who work on a seasonal basis.
- iv.) Temporary employees
- v.) Variable employees – An employee is a variable hour employee if based on the facts and circumstances at the employee's start date, it cannot be determined that the employee is reasonably expected to work on average at least 30 hours per week.
- vi.) Commissioned employees – Employees who are paid on a commission basis, in whole or in part.

If not already in place, consider a census coding system to easily identify different groups of employees. The goal will be to filter this list down to the final list of employees eligible for benefits under PPACA.





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Organizing Eligibility cont...

The census should include the following employee data categories:

1. Employee name
2. Date of hire
3. Date of birth
4. Dependents under age 26? Yes / No
5. Wages
 - a. Type of wages paid (salary, hourly, bonus, commissions, etc.)
 - b. Amount of wages per employee by hour, weekly, bi-weekly, semi-monthly or monthly.
6. Employee classification from previous page
7. Identify collectively bargained vs. non-collectively bargained employees
8. Employer share of contribution for:
 - a. Single coverage only
 - b. Dependent coverage

On-going Eligibility Reporting Requirements

Beginning January 1st 2014, PPACA requires that large employers track each employee's status as a full-time employee (30 + hours per week), or at least 130 hours per month, or part-time. They will be required to report each employee's full-time status to the IRS and keep as part of their tax records the status of each employee.

- Hours worked
- Hours for which an employee is paid but does not work (vacation, holidays, paid sick days, jury duty, military duty or all paid periods of leave of absence
- Periods of unpaid leave under FMLA.

Hours of service must be tracked on an actual hours basis for hourly employees. The rules provide optional days-worked and weeks-worked tracking categories. These are designed to facilitate tracking wages of salaried employees.

Employers may also use weekly, bi-weekly or semi-monthly payroll periods rather than months as the basis for their elected measurement (aka "look back") period; again, to facilitate easier compliance with the PPACA's eligibility tracking rules.

