

ADP TotalSource

ACA Lookback Measurement Period

Client User Guide



Contents

How to Use This Guide	3
Employer Shared Responsibility Provision	3
The Purpose of This Guide	3
Additional Resources	4
Determining Benefits Eligibility for New Hires	4
Choosing Eligibility in the New Hire Wizard	4
Coding Full-Time, Variable, and Seasonal Employees Using Lookback Measurement Periods	4
Important Notes:	8
Employment Status Changes	9
Changing an Employee from Part-Time to Full-Time	10
Update the Employee Worker Category to Full-Time	10
Update the Benefits Eligibility Class	14
Manually Designate ACA Status to ACA Full-Time	16
Changing an Employee from Designated ACA Full-Time to Part-Time	
Determining if an Employee Has Been Employed at Least One Full Standard Measurement Period	22
Change an Employee from Full-Time to Part-Time When They Have Been Employed at Least One Full Standard Measurement Period	25
Change the ACA Benefit Status to Begin Calculating in the Next Available Measurement Period	25
Do Not Change the Benefits Eligibility Class	
Update the Employee Worker Category to Part-Time	27
Change an Employee from Full-Time to Part-Time When They Have NOT Been Employed at Least One Full Standard Measurement Period	29
Enter the Manually Designated ACA Benefit Status End Date	29
Update the Benefits Eligibility Class Code	32
Update the Employee Worker Category to Part-Time	34
ACA Compliance Dashboard	36
What is the ACA Compliance Dashboard?	36

Accessing the ACA Compliance Dashboard	36
ACA Trending Dashboard	37
What is the ACA Trending Dashboard?	37
Accessing the ACA Trending Dashboard	37
ACA Benefit Status Trending Tab	38
ACA Potential Trending Assessments	40
APPENDIX A	42
Job Aid: Coding Full-Time, Variable, and Seasonal Employees Using Lookback Measurement Periods	42
Full Time Employees:	42
Employees with Variable Hours:	42
Seasonal Employees	42
APPENDIX B	43
Job Aid: Changing an Employee from Part-Time to Full-Time	43
Update the Employee Worker Category to Full-Time	43
Update the Benefits Eligibility Class	43
Manually designate ACA Status to ACA Full-Time	43
APPENDIX C	44
Job Aid: Changing an Employee from Designated Full-Time to Part-Time	44
Determining if an Employee Has Been Employed at Least One Full Standard Measurement Period	44
APPENDIX D	45
Job Aid: Change an Employee from Full-Time to Part-Time When They Have Been Employed at Least One Full Standard Measurement Period	45
Change the ACA Benefit Status to Begin Calculating in the Next Available Measurement Period	45
Update the Employee Worker Category to Part-Time	45
APPENDIX E	46
Job Aid: Change an Employee from Full-Time to Part-Time When They Have NOT Been Employed at Least One Full Standard Measurement Period	46
Enter the Manually Designated ACA Benefit Status End Date	46
Update the Benefits Eligibility Class Code	46

Update the Employee Worker Category to Part-Time	46
APPENDIX F	47
Job Aid: Access the ACA Compliance Dashboard	47
APPENDIX G	47
Job Aid: Access the ACA Trending Dashboard	47

How to Use This Guide

Employer Shared Responsibility Provision

The employer shared responsibility provisions of the Affordable Care Act (ACA) state that an applicable large employer (ALE) must offer affordable health coverage that provides minimum value to its full-time employees. For this purpose, employees are considered full-time if they work at least 30 hours per week, or 130 hours per month.

There are two methods available for determining whether an employee is a full-time employee:

- Look-back measurement method: determines whether an employee is a full-time employee for a future period (referred to as the stability period), based upon the employee's average hours of service in a prior period (referred to as the measurement period).
- Monthly measurement method: determines whether an employee is a full-time employee by counting the employee's hours of service for each month.

This User Guide is specific only to those clients utilizing Lookback Measurement Periods. If you do not use a Lookback Measurement Period, then you are using Monthly Measurement Periods. Please refer to the ACA Monthly Measurement Period Client User Guide instead.

The Purpose of This Guide

This Guide gives you step-by-step guidance on how to access and use the ACA tools in ADP TotalSource. The Table of Contents is clickable – you can jump to any section of the Client User Guide by clicking on a heading in the Table of Contents. You can return to the Table of Contents from any page by clicking on the **Return to Table of Contents** link at the bottom of every page.

Appendices – once you are comfortable with the processes described in this Guide, you may find the appendices useful as a quick reference. Each Appendix has a step-by-step process listed, but without the accompanying screen captures found in the main body of the Guide.

Additional Resources

Information such as reporting timelines and additional guides are posted on our <u>Insights & Solutions Healthcare Reform page</u>.

Determining Benefits Eligibility for New Hires

Choosing Eligibility in the New Hire Wizard

When adding an employee through the New Hire Wizard, it is essential for you to choose the correct Benefit Eligibility Class and ACA Benefit Status calculation method to ensure adherence to compliance requirements. The applicable ACA Benefit Status calculation method – calculated or designated – will vary and should be based on the worksite employee's situation.

This Job Aid reviews fields in the New Hire Wizard which are key to ensuring an employee is properly coded for Health Care Reform reporting:

- Employee Benefit Eligibility Class: choosing the correct benefits eligibility class ensures that employees are offered benefits in keeping with the ACA definition of full-time employee so that you can avoid penalties associated with failure to provide Minimum Essential Coverage (MEC).
- ACA Benefit Status: selecting the correct ACA Benefit Status Calculation method 'Designated Full-time' or 'Calculated' will ensure that 1095C forms are generated for full-time employees and employees are included (or not included) in 1094C employee counts.

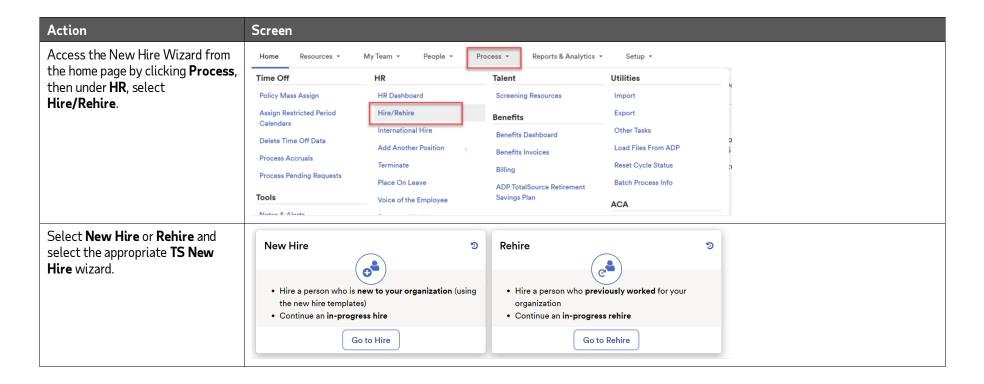
ACA fields can be found in Section 2. Employment of the New Hire Wizard. How you code employees is different for clients who use Lookback Measurement Periods and clients who use Monthly Measurement Periods. If you do not use a Lookback Measurement Period, you are using Monthly Measurement Periods.

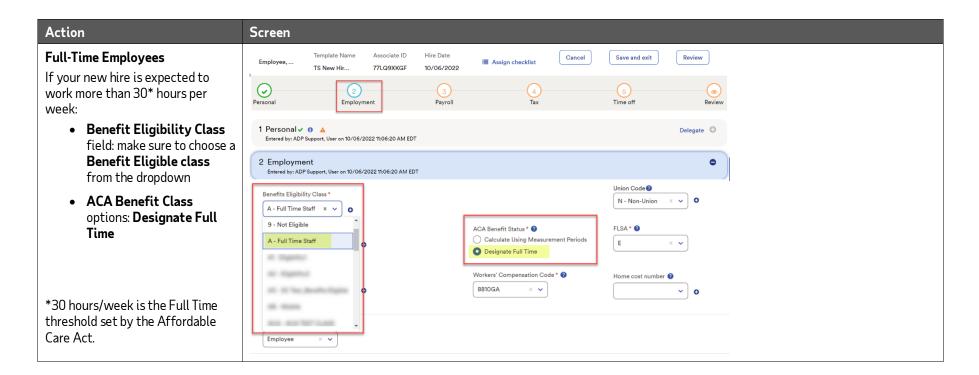
ADP TotalSource provides clients with guidance and tools to assist them with complying with the Employer Shared Responsibility provisions under the ACA and other Health Care Reform initiatives; however, it remains each client's responsibility to comply with the law and to ensure that medical coverage is offered to its full-time employee population that meets the ACA's minimum coverage and affordability requirements as required under the ACA. Of course, your ACA Benefits team is here to help you with issues that you cannot resolve on your own.

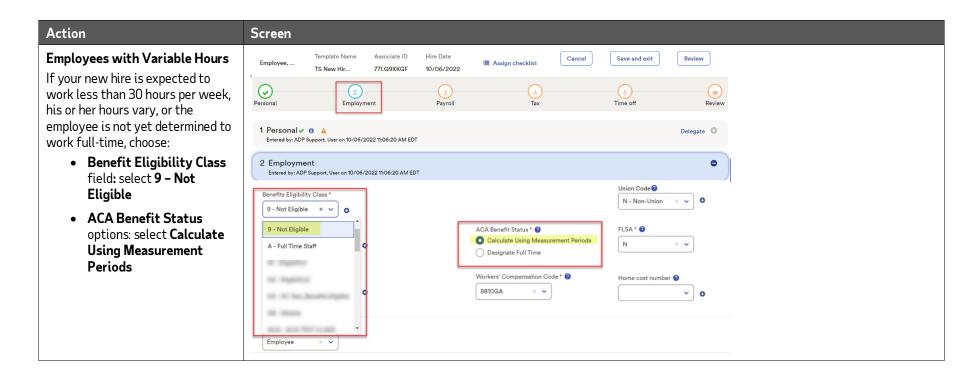
Coding Full-Time, Variable, and Seasonal Employees Using Lookback Measurement Periods

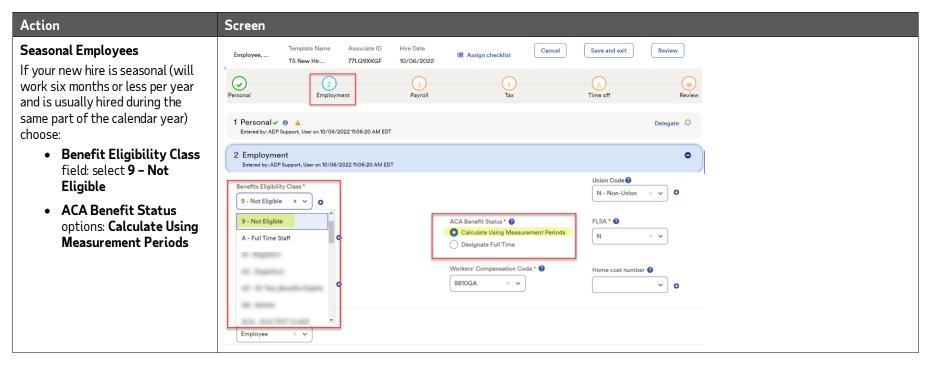
Below are instructions for coding Full-Time, Variable and Seasonal employees when you are using Lookback Measurement Periods.

Make sure you view Important Notes at the bottom of this section for key compliance considerations.









Important Notes:

- If you select "Calculate Using Measurement Periods" for a full-time employee, a 1095-C Form will not generate appropriately for the current reporting year thereby exposing your company to possible penalties for failing to report
- If you are aware of any full-time new hires that were previously set up this year to "Calculate" their status, you may change their ACA Status to a Designated Full-Time employee, using their original hire date in their ACA Information Screen. Go to: People > ACA > ACA Information and click the "manually designate a status instead" link to change this.
- Employees that are Designated Full-Time will not be measured in a Lookback Measurement Period. Should the employee's permanent employment status change to Part-Time or Variable Hour in the future, you need to update their ACA Status determination method to begin using measurement periods to "calculate" the status in their ACA Information Screen. Go to: People > ACA > ACA Information and click the "calculate the ACA Status instead" link to change this. See section:

 "Changing an Employee from Full-Time to Part-Time" in this guide.

Employment Status Changes

When making changes to employee status, you must choose the correct Worker Category, Benefit Eligibility Class, and ACA Benefit Status calculation method to ensure adherence to compliance standards. Note: You must also notify the ADP TotalSource Benefits team of any changes to an employee's Benefit Eligibility Class to ensure the employee's benefit offerings are properly updated.

This section walks you through two common employment status change scenarios:

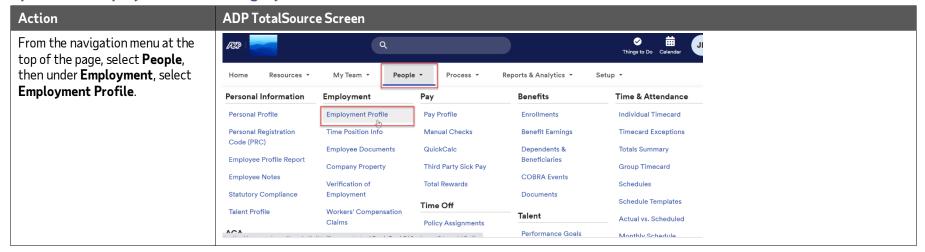
- Changing an employee's status from part-time to full-time
- Changing an employee's status from Designated ACA full-time to part-time:
 - Individual has been employed for at least one full standard measurement period
 - Individual has NOT been employed for at least one full standard measurement period

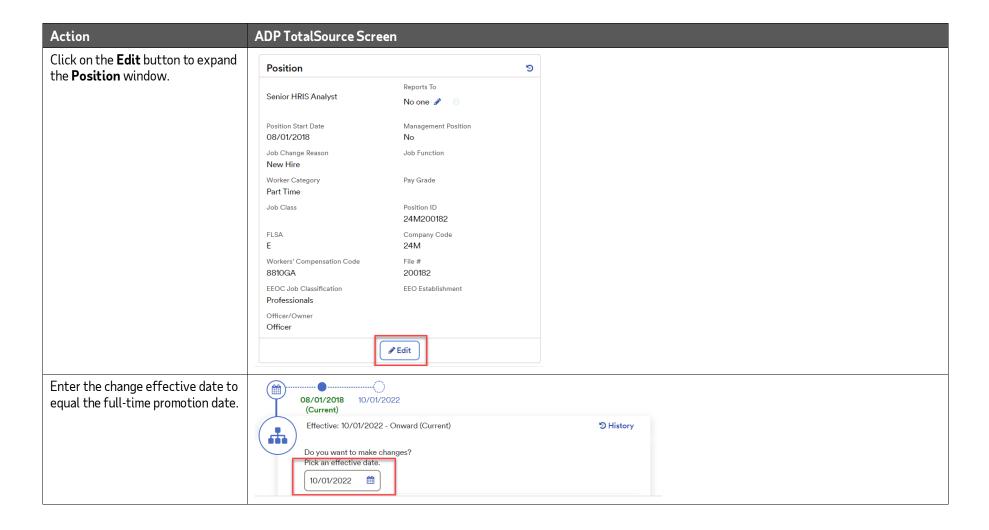
Please keep in mind there is no one-size-fits-all solution. If you must make a change to an employee's status that is not outlined in this Guide or you have specific questions, then you should consult your HR Business Partner or the TotalSource Compliance Solutions Group.

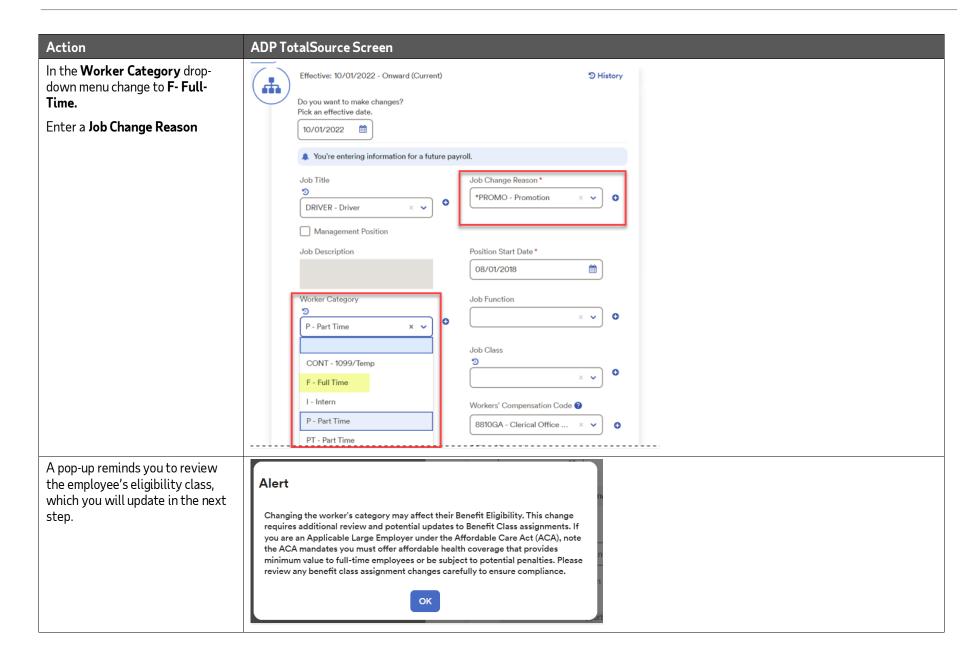
Changing an Employee from Part-Time to Full-Time

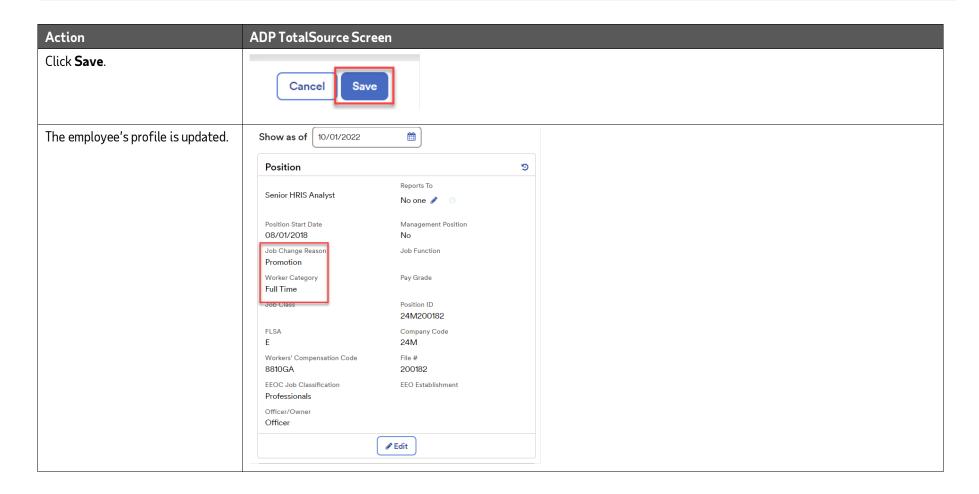
If an existing employee is promoted from a part-time, variable hour, or seasonal position to a full-time position (the employee is now expected to work an average of 30 hours or more hours per week), you need to make changes in their Employment Profile AND in their ACA Information Screen.

Update the Employee Worker Category to Full-Time

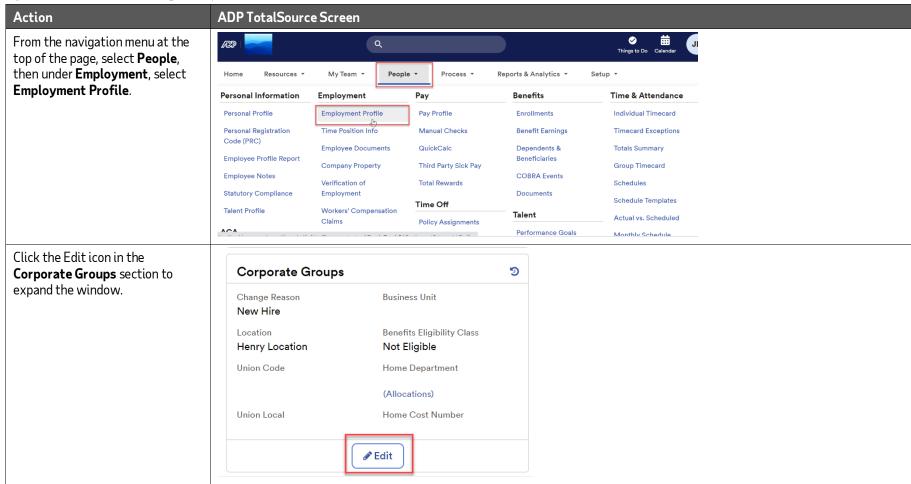


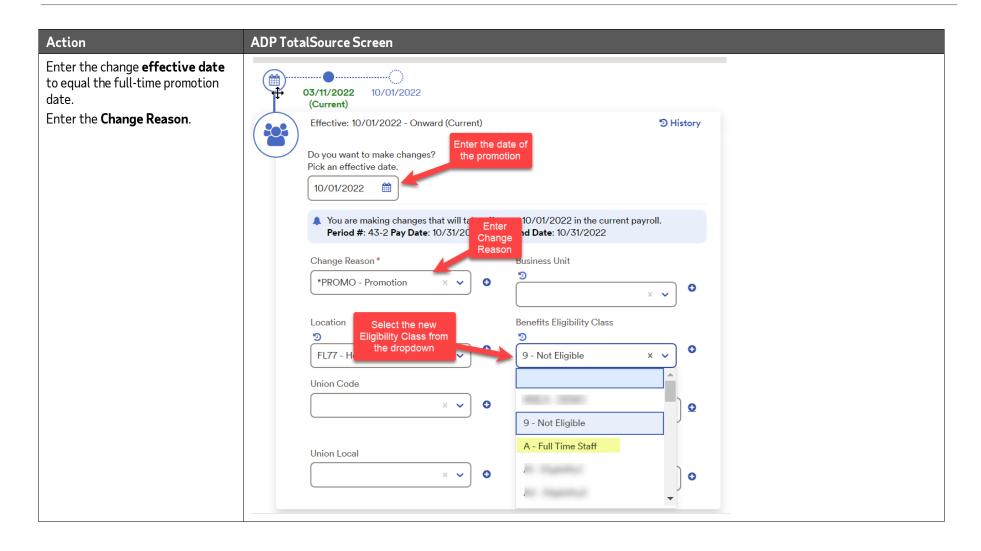






Update the Benefits Eligibility Class



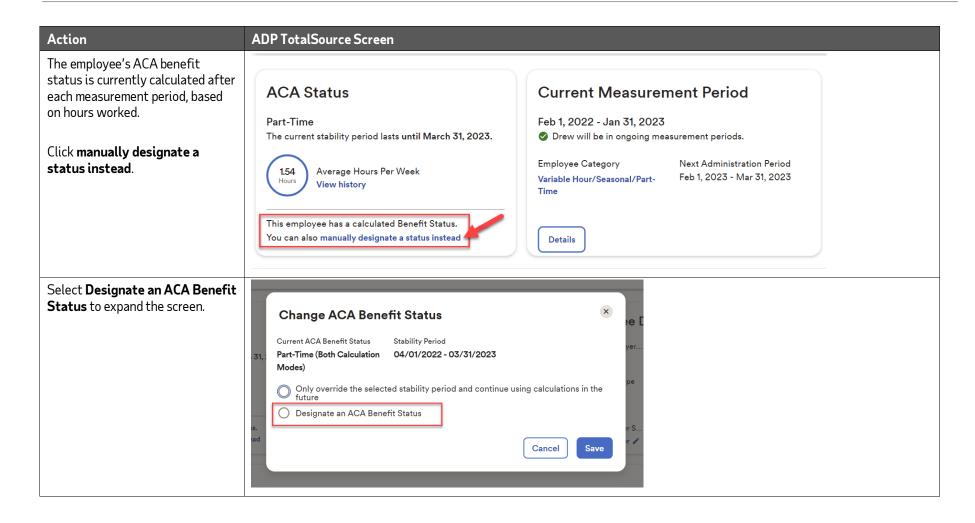


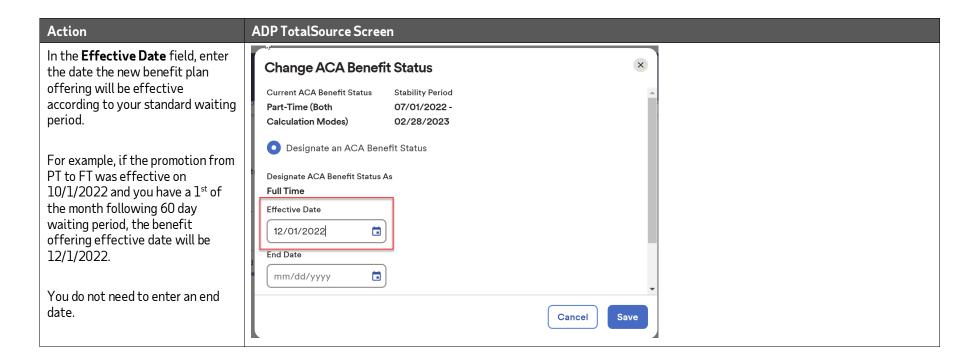


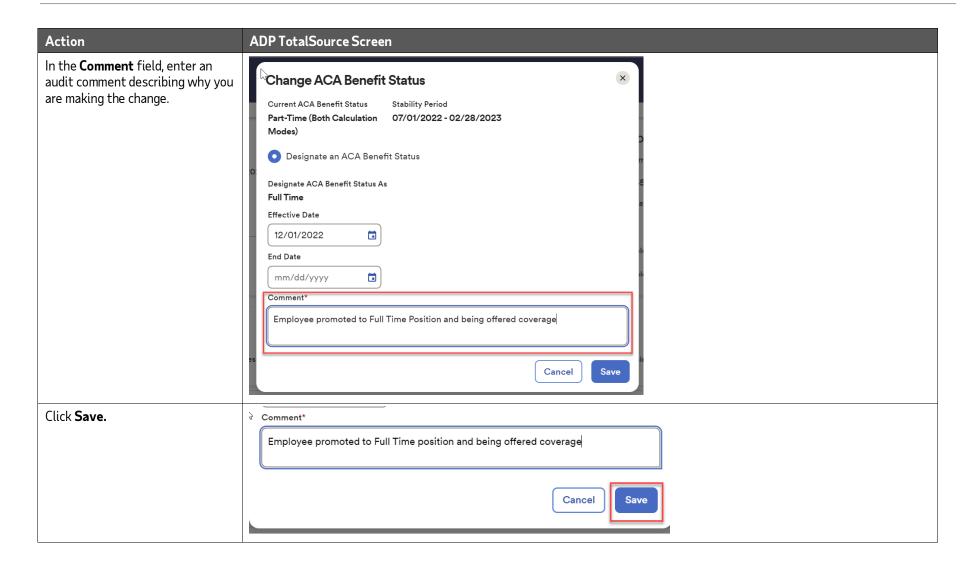
Manually Designate ACA Status to ACA Full-Time

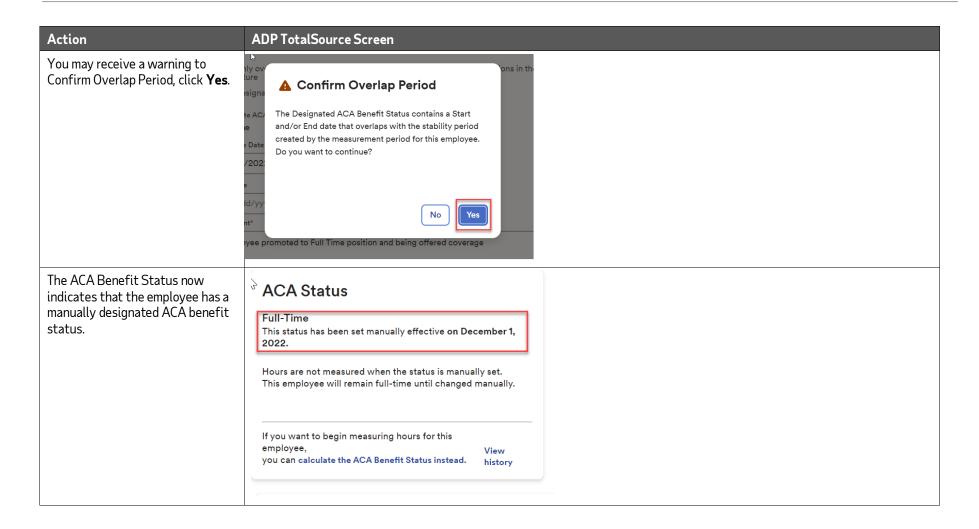
Change the employee's ACA Benefit Status to a manually designated full-time ACA benefit status.











Changing an Employee from Designated ACA Full-Time to Part-Time

An existing employee whose ACA Status is currently designated as full-time is not actively being measured in a Lookback Measurement Period. Instead, their ACA Status is defaulted to full-time because it is expected that their measurement period results will always be calculated as full-time.

Should the employee's permanent employment status change to part-time or variable hour, update their ACA Benefit Status determination method to begin using measurement periods to "calculate" the status in their ACA Information Screen.

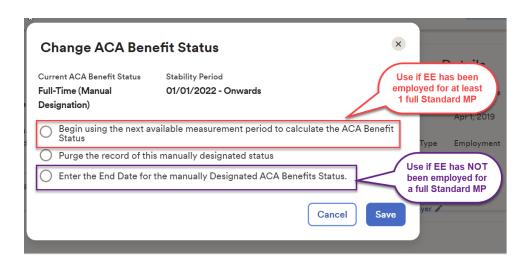
NOTE: If the employee's ACA Benefit Status determination method is already set to "calculate" their status and they have previously completed a measurement period in which they averaged full-time hours, they should have a current or future ACA Full-Time Stability Period in place. In this scenario, the employee should remain in an eligible benefits class code until they are calculated as ACA Part-Time in a subsequent Measurement Period. No updates should be made to their ACA benefit status or eligibility class at this time. You may skip to the section: "Update the Employee Worker Category to Part-Time."

If an employee will be consistently working part-time hours moving forward, contact your Benefits Specialist to create a benefit class code for a reduction in hours benefit offering that doesn't include life/disability.

Changing a Designated ACA Full-Time benefit status can be very complex under the Lookback Measurement Method and depends on whether the existing employee has been employed with you for at least one full Standard Measurement Period.

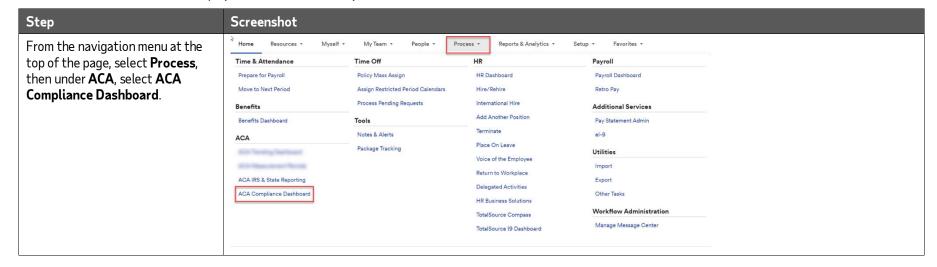
The action in the Change ACA Benefit Status Screen will vary for each scenario and changes to an employee's benefits eligibility class will only be allowed under certain criteria. We will review each scenario below in more detail:

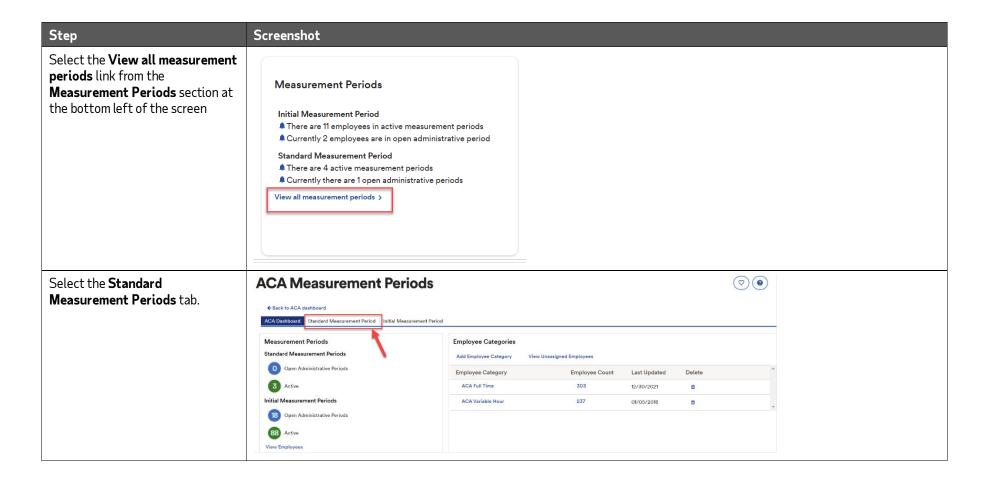
- An employee has been employed for at least one full Standard Measurement Period
- An employee has NOT been employed for at least one full Standard Measurement Period

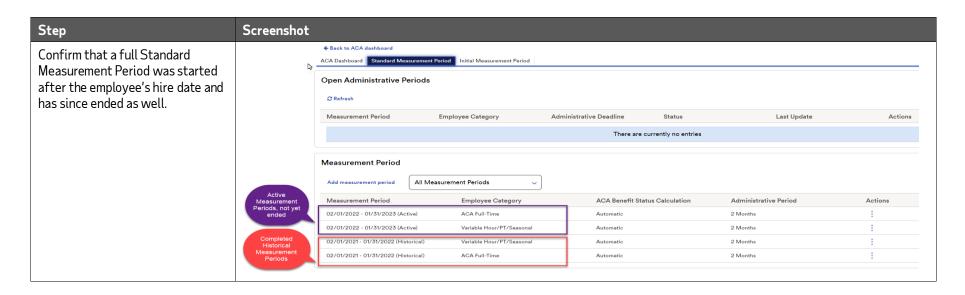


Determining if an Employee Has Been Employed at Least One Full Standard Measurement Period

Before updating an employee's ACA Benefit Status screen, you should first determine if your employee has been employed for at least one full Standard Measurement Period. In the scenario below an employee was hired on January 18th, 2023.







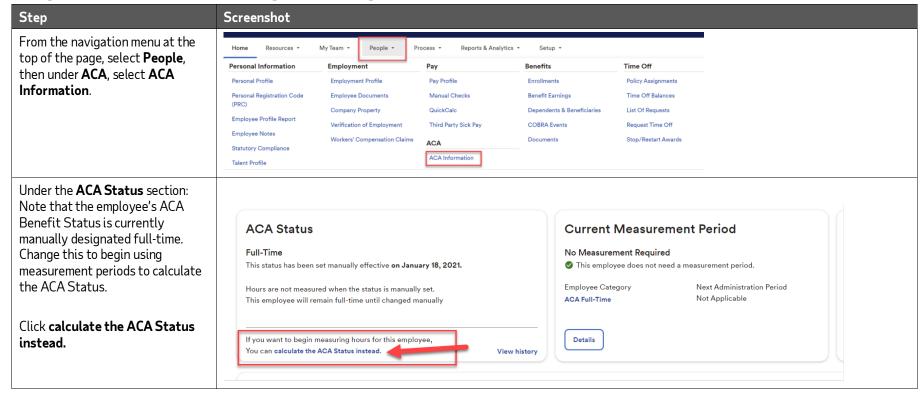
In this example, the Standard Measurement Periods run from 2/1 – 1/31 of each year and the employee has been employed for at least one full Standard Measurement Period since they were hired on 01/18/2021 and would have been employed for the entire Standard Measurement Period that ran 02/01/2021 - 01/31/2022.

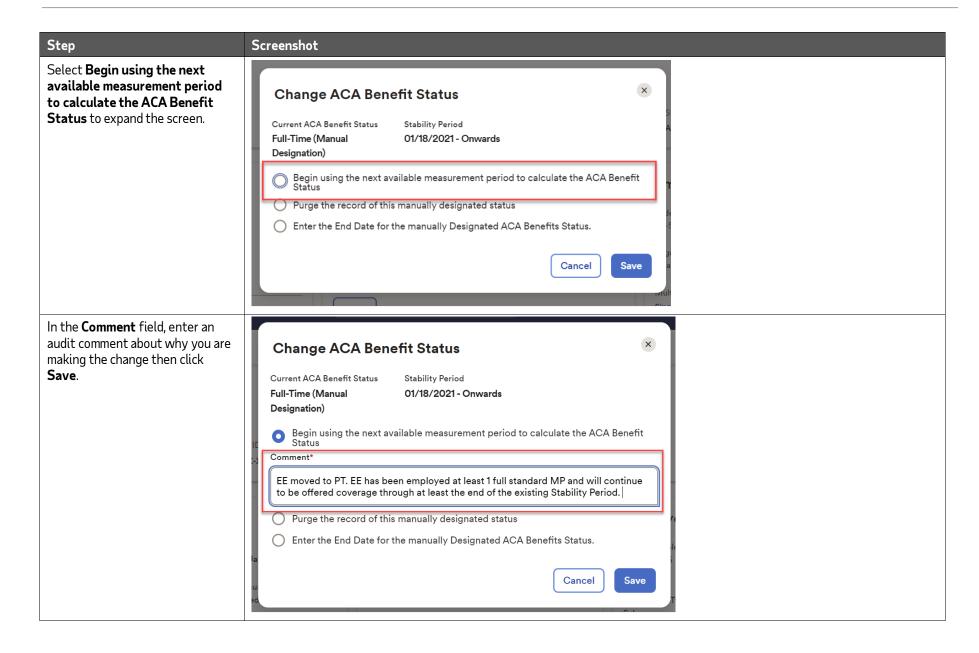
Had the employee been hired as of 12/30/2021, the employee would NOT have been employed for a full Standard Measurement Period as the employee's first Standard Measurement Period did not begin until 02/01/2022. You cannot count a partial Measurement Period, only one that has been completed from start to finish.

Change an Employee from Full-Time to Part-Time When They Have Been Employed at Least One Full Standard Measurement Period

Under the Lookback Measurement Period, if the existing employee has been employed with you for at least one full Standard Measurement Period, the treatment of the employee as a full-time employee must remain for the duration of the current Stability Period, regardless of a decrease in hours. The subsequent Stability Period will be calculated using hours worked during the existing measurement period.

Change the ACA Benefit Status to Begin Calculating in the Next Available Measurement Period





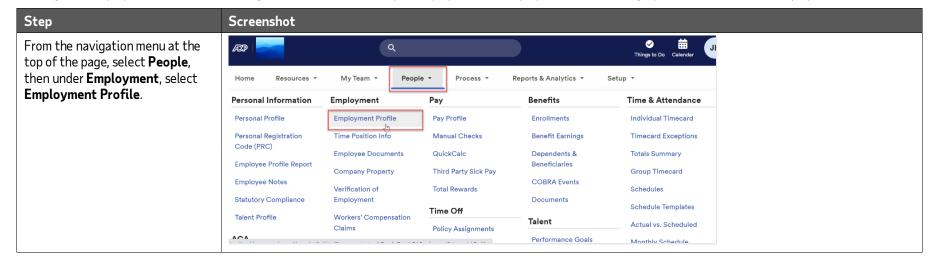
Do Not Change the Benefits Eligibility Class

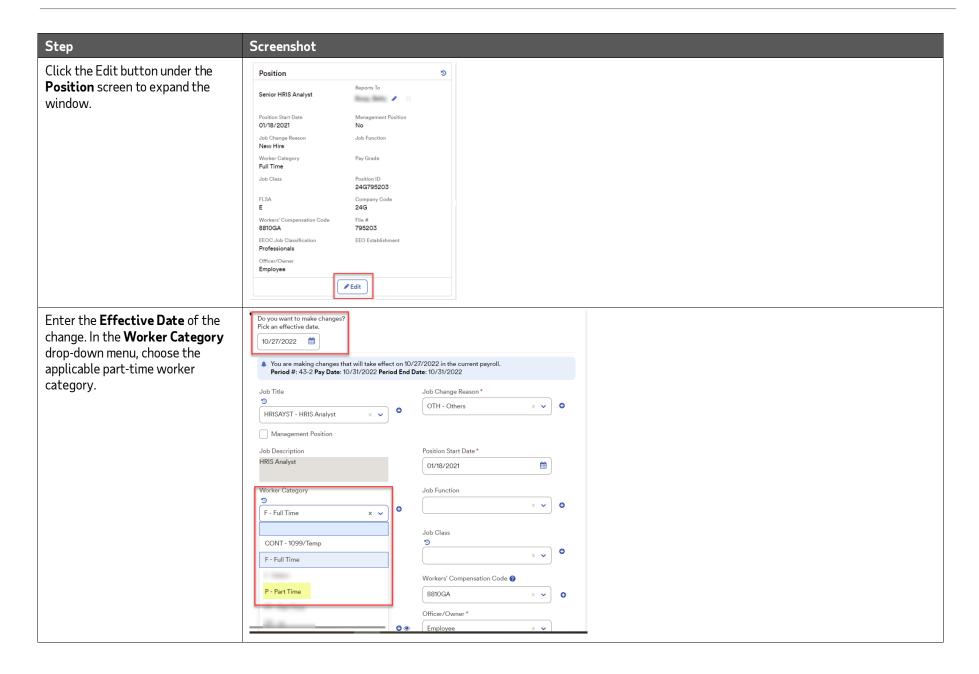
IMPORTANT: The employee will still be in a Designated ACA Full Time status through the end of the existing Stability Period and **should remain in an** eligible benefits class code until they are calculated as ACA Part Time in a subsequent Measurement Period.

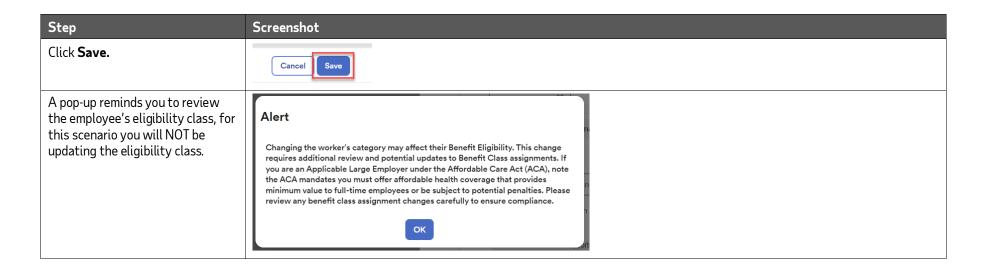
If an employee will be consistently working part-time hours moving forward, contact your Benefits Specialist to create a benefit class code for a reduction in hours benefit offering that doesn't include life/disability.

Update the Employee Worker Category to Part-Time

Although the employee must remain in an eligible benefits class code, you may update the employee's Worker Category to Part-Time in their Employment Profile.





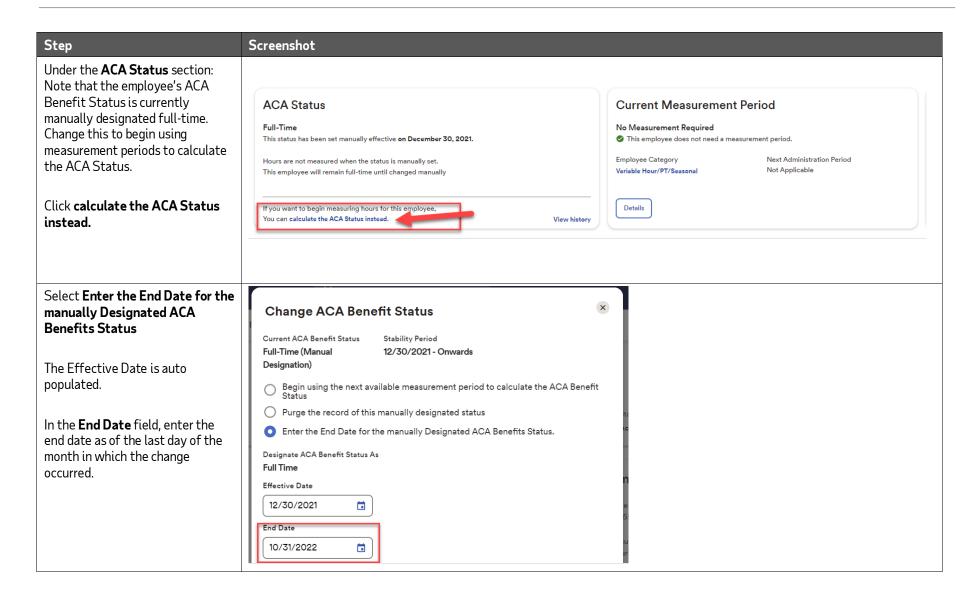


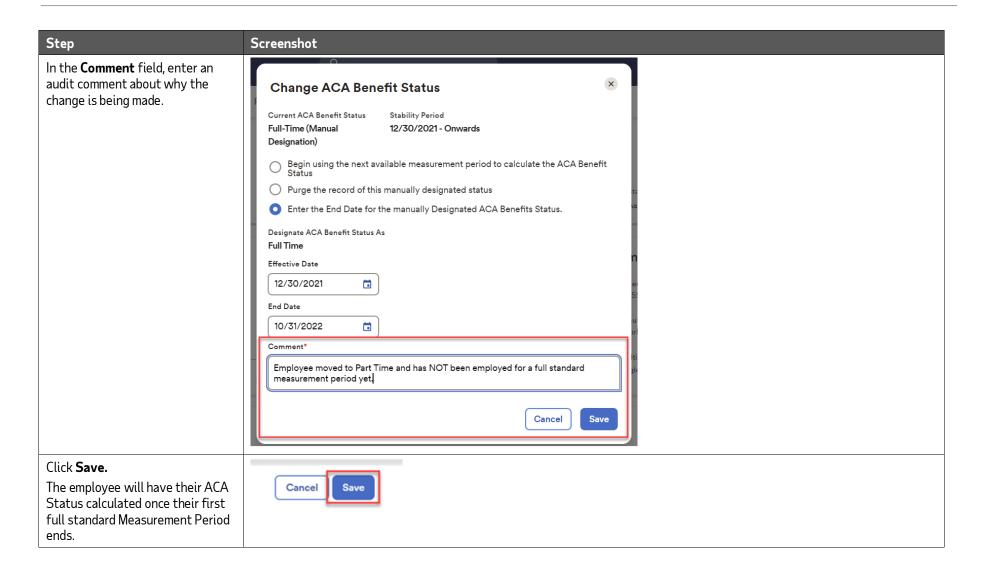
Change an Employee from Full-Time to Part-Time When They Have NOT Been Employed at Least One Full Standard Measurement Period

Under the Lookback Measurement Period, if the existing employee has NOT been employed with you for at least one full Standard Measurement Period, the treatment of the employee as a full-time employee can cease at the end of the month in which the change occurs. The employee will have his or her ACA Status calculated once the next measurement period comes to an end.

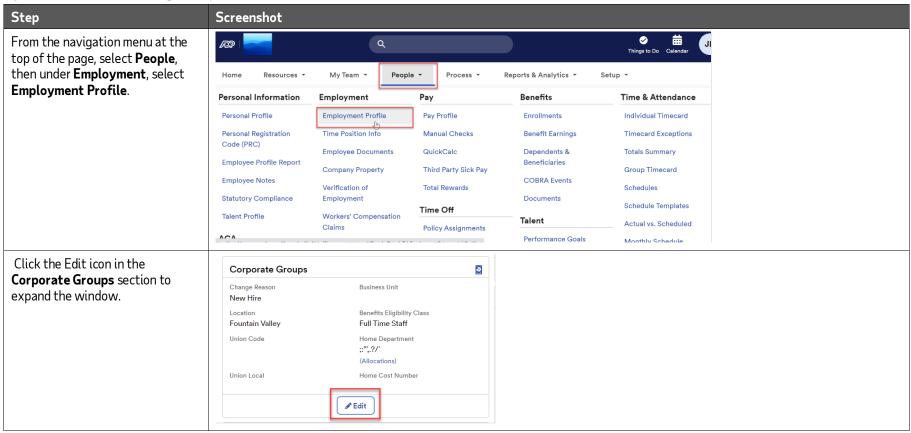
Enter the Manually Designated ACA Benefit Status End Date

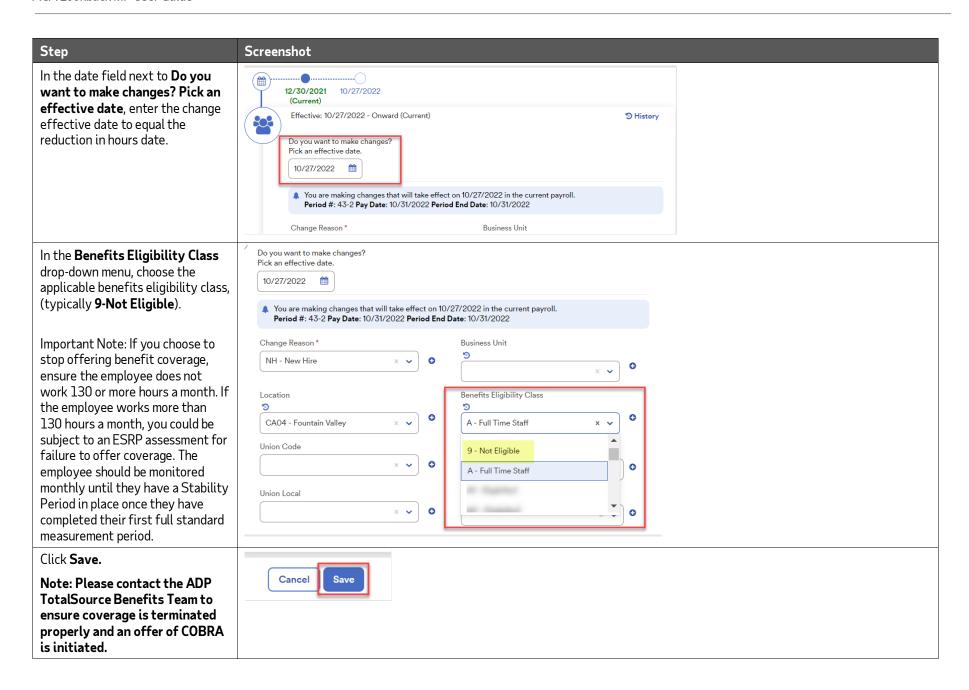




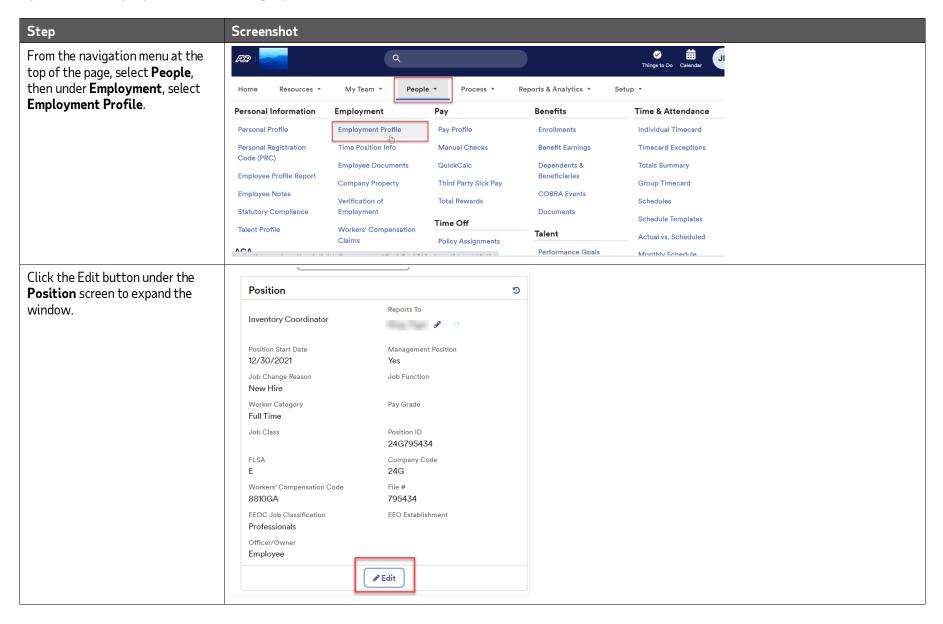


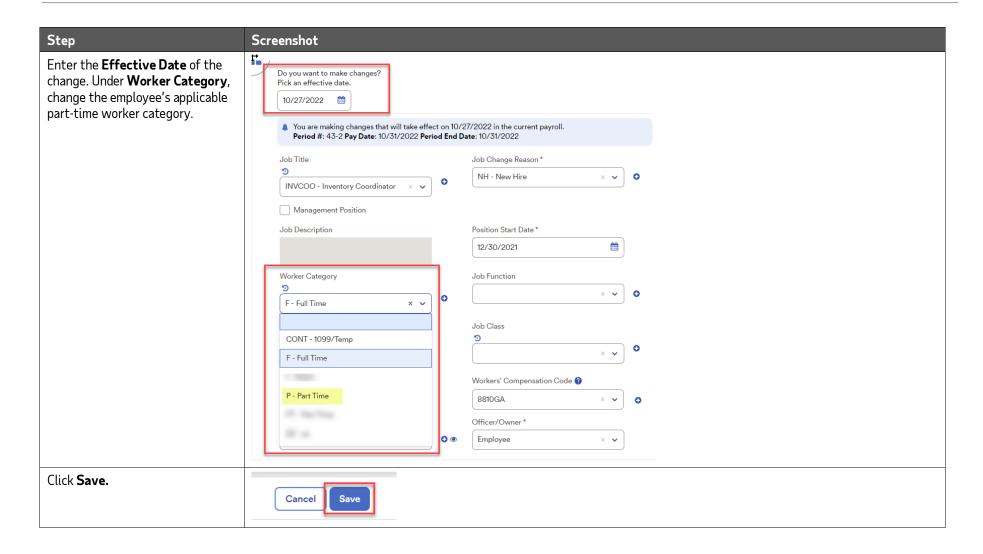
Update the Benefits Eligibility Class Code





Update the Employee Worker Category to Part-Time



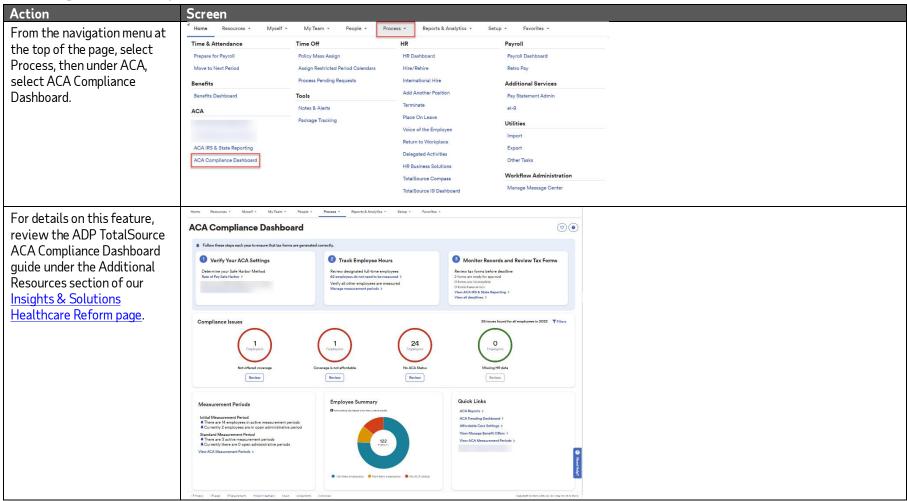


ACA Compliance Dashboard

What is the ACA Compliance Dashboard?

The ACA Compliance Dashboard consolidates your company's ACA information and allows you to verify your ACA Settings, track employee hours, monitor records, review tax forms, resolve compliance issues, and more.

Accessing the ACA Compliance Dashboard

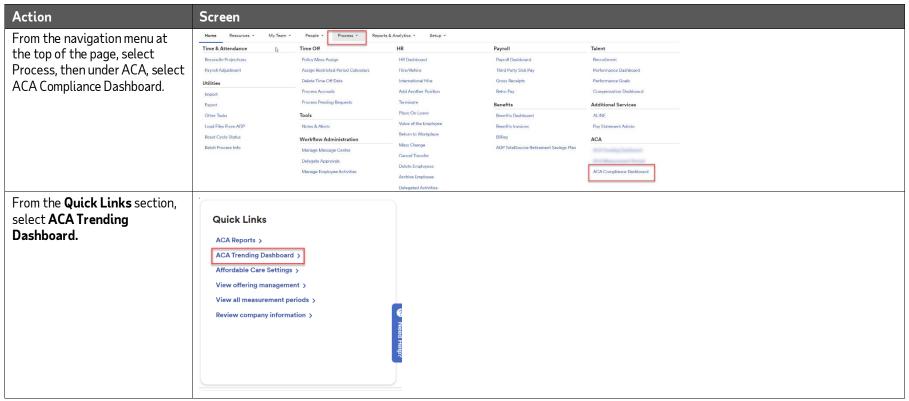


ACA Trending Dashboard

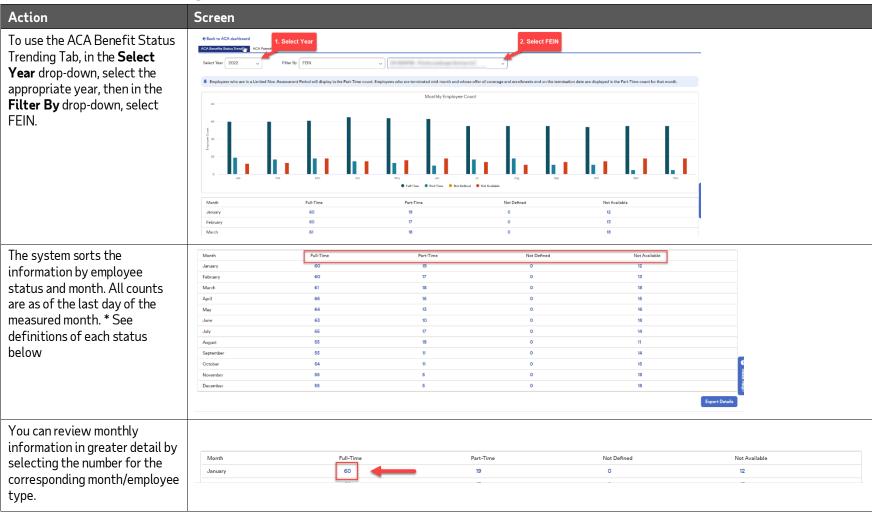
What is the ACA Trending Dashboard?

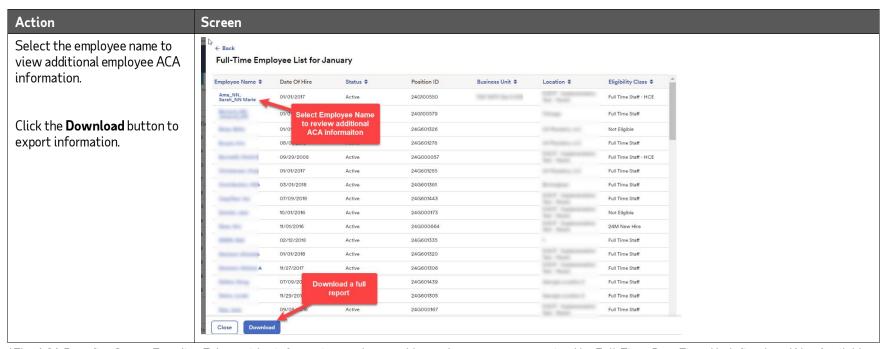
The ACA Trending Dashboard is a feature that gives you a monthly and YTD view of the Shared Responsibility requirement to offer Minimum Essential Coverage (MEC) and Minimum Value (MV) coverage to eligible employees.

Accessing the ACA Trending Dashboard



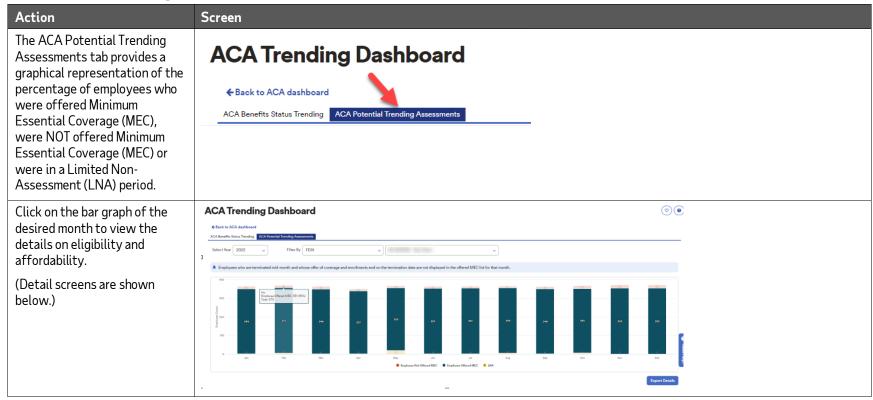
ACA Benefit Status Trending Tab

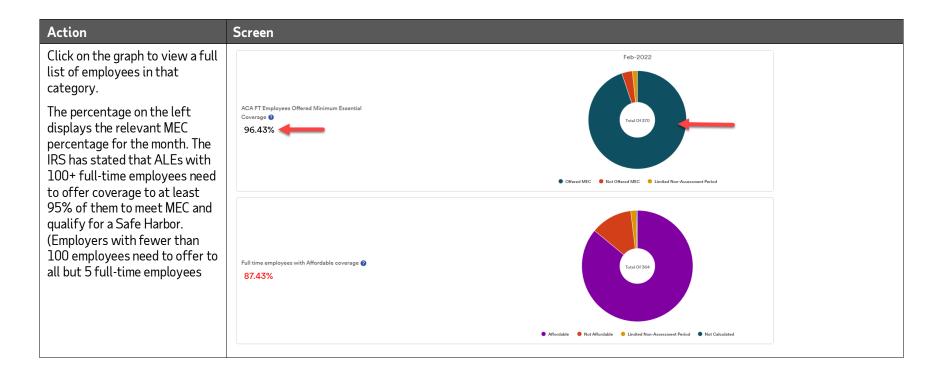




- *The ACA Benefits Status Trending Tab provides information on the monthly employee count categorized by Full-Time, Part-Time, Undefined, and Not Available.
- Full Time: Stability Period Designation Employee averaged 130+ hours or more a month during the associated Lookback Measurement Period OR was designated as ACA Full-Time
- Part Time: Stability Period Designation Employee averaged less than 130 hours a month during the associated Lookback Measurement Period.
- Undefined: employee was not a part of any pay periods during the measurement period
- Not Available: initial Waiting Period or Lookback Measurement Period has not been completed (New Hires will appear in this category)

ACA Potential Trending Assessments





APPENDIX A

Job Aid: Coding Full-Time, Variable, and Seasonal Employees Using Lookback Measurement Periods

1. Access the New Hire Wizard from the home page by clicking **Process**, then under **HR**, select **Hire/Rehire**.

Full Time Employees:

- 1. If your new hire is expected to work more than 30 hours per week, choose:
 - o Benefit Eligibility Class field: select Benefit Eligible
 - o ACA Benefit Class options: select Designate Full Time

Employees with Variable Hours:

- 1. If your new hire is expected to work less than 30 hours per week, his or her hours vary, or the employee is not yet determined to work full-time, choose:
 - o Benefit Eligibility Class field: select 9-Not Eligible
 - o ACA Benefit Class options: select Calculate Using Measurement Periods

Seasonal Employees

- 1. If your new hire is seasonal (will work six months or less per year and is usually hired during the same part of the calendar year) choose:
 - o Benefit Eligibility Class field: select 9-Not Eligible
 - o ACA Benefit Class options: select Calculate Using Measurement Periods

APPENDIX B

Job Aid: Changing an Employee from Part-Time to Full-Time

Update the Employee Worker Category to Full-Time

- 1. From the navigation menu at the top of the page, select **People**, then under **Employment**, select **Employment Profile**.
- 2. Click on **Position** to expand the window.
- 3. Enter the change effective date to equal the full-time promotion date.
- 4. In the **Worker Category** drop-down menu choose **F- Full-Time**.
- 5. Click **Done**.
- 6. A pop-up reminds you to review the employee's eligibility class.

Update the Benefits Eligibility Class

- 1. From the navigation menu at the top of the page, select **People**, then under **Employment**, select **Employment Profile**.
- 2. Click the **Corporate Groups** link to expand the window.
- 3. Enter the change effective date to equal the full-time promotion date.
- 4. In the **Benefits Eligibility Class** drop-down menu, select the applicable benefits eligible class.
- 5. Click **Save**.
- 6. Contact the ADP TotalSource Benefits Team to open the enrollment process or an offer of coverage will not be initiated.

Manually designate ACA Status to ACA Full-Time

- 1. From the navigation menu at the top of the page, select **People**, then under **ACA**, select **ACA Information**.
- 2. Under ACA Status, click manually designate a status instead.
- 3. Select **Designate an ACA Benefit Status** to expand the pop-up screen.
- 4. In the **Effective Date** field, enter the date the new benefit plan offering will be effective according to your standard waiting period. For example, if the promotion from PT to FT was effective on 10/1/2023 and you have a 1st of the month following 60 day waiting period, the benefit offering effective date will be 12/1/2023. You do not need to enter an end date.
- 5. In the **Comment** field, enter an audit comment describing why you are making the change.

- 6. Click Save.
- 7. The ACA Benefit Status now indicates that the employee has a manually designated ACA benefit status.

APPENDIX C

Job Aid: Changing an Employee from Designated Full-Time to Part-Time

Determining if an Employee Has Been Employed at Least One Full Standard Measurement Period

- 1. From the navigation menu at the top of the page, select **Process**, then under **ACA**, Select **ACA Compliance Dashboard**.
- 2. Under the Measurement Periods Section at the bottom of the screen, click the view all measurement periods link
- 3. Select the **Standard Measurement Periods** tab.
- 4. Confirm that a full Standard Measurement Period was started after the employee's hire date and has since ended as well
- 5. If the employee has been employed at least one full standard measurement period, proceed to Appendix C.

 If the employee has NOT been employed at least one full standard measurement period, proceed to Appendix D.

APPENDIX D

Job Aid: Change an Employee from Full-Time to Part-Time When They Have Been Employed at Least One Full Standard Measurement Period

Change the ACA Benefit Status to Begin Calculating in the Next Available Measurement Period

- 1. From the navigation menu at the top of the page, select **People**, then under **ACA**, select **ACA Information**.
- 2. Under ACA Status, click **calculate the ACA Status instead** (Note that the employee's ACA Benefit Status is currently manually designated full-time. Change this to begin using measurement periods to calculate the ACA Status.)
- 3. Select **Begin using the next available measurement period to calculate the ACA Benefit Status** to expand the screen.
- 4. In the **Comment** field, enter an audit comment about why you are making the change.
- 5. Click **Save**.

Update the Employee Worker Category to Part-Time

- 1. From the navigation menu at the top of the page, select **People**, then under **Employment**, select **Employment Profile**.
- 2. Click on **Position** to expand the window.
- 3. In the **Worker Category** drop-down menu, choose the applicable part-time worker category.
- 4. Click **Done**.

APPENDIX E

Job Aid: Change an Employee from Full-Time to Part-Time When They Have NOT Been Employed at Least One Full Standard Measurement Period

Enter the Manually Designated ACA Benefit Status End Date

- 1. From the navigation menu at the top of the page, select **People**, then under **ACA**, select **ACA Information**.
- 2. Under ACA Status, click calculate the ACA Status instead.
- 3. Select **Enter the End Date for the manually Designated ACA Benefits Status.** The **Effective Date** is auto populated. In the **End Date** field, enter the end date as of the last day of the month in which the change occurred.
- 4. In the **Comment** field, enter an audit comment about why the change is being made.
- 5. Click **Save**.

Update the Benefits Eligibility Class Code

- 1. From the navigation menu at the top of the page, select **People**, then under **Employment**, select **Employment Profile**.
- 2. Click the **Corporate Groups** link in the Employment Profile window.
- 3. In the date field next to **Do you want to make changes? Pick an effective date**, enter the change effective date to equal the reduction in hours date.
- 4. In the **Benefits Eligibility Class** drop-down menu, choose the applicable not eligible benefits eligibility class.
- 5. Click **Save**.
- 6. Contact the ADP TotalSource Benefits Team to ensure coverage is terminated properly and an offer of COBRA is initiated.

Update the Employee Worker Category to Part-Time

- 1. From the navigation menu at the top of the page, select **People**, then under **Employment**, select **Employment Profile**.
- 2. Click on **Position** to expand the screen.
- 3. Under **Worker Category**, change the employee's applicable part-time worker category.
- 4. Click Save.

APPENDIX F

Job Aid: Access the ACA Compliance Dashboard

- 1. From the navigation menu at the top of the page, select **Process**, then under **ACA**, select **ACA Compliance Dashboard.**
- Review the ACA Compliance Dashboard guide on our Insights & Solutions Healthcare Reform page.

APPENDIX G

Job Aid: Access the ACA Trending Dashboard

- From the navigation menu at the top of the page, select **Process**, then under **ACA**, select **ACA Compliance Dashboard.**
- From the Quick Links section, select ACA Trending Dashboard
- To use the ACA Benefit Status Trending Tab, in the Select Year drop-down, select the appropriate year, then in the Filter By drop-down, select FEIN.
 - a. The system sorts the information by employee status and month. All counts are as of the last day of the measured month.
- Select the number under the corresponding month/employee type to review monthly information in greater detail.
- Select the employee name to view additional employee ACA information.
- Select **Download Employee List** to export information.

Credits

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