

# **ADP Health Compliance**

HR Import File Specification (.csv)

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## **Overview**

ADP Health Compliance provides data synthesis, monitoring, analytics and managed service around health compliance regulations and requirements such as the Affordable Care Act (ACA). This guide provides the specifications and information necessary for successful file transmission for files from your Human Resources (HR) system to ADP Health Compliance.

## **HR Data Interface**

#### **Initial File**

An initial HR file must be received and loaded for every ADP Health Compliance implementation. The "initial" file is the same as the file which will be sent to ADP Health Compliance on an ongoing basis, but will cover a larger period of time. Records in the initial file must be grouped by employee and ordered oldest to most current (top to bottom) within the file. A new record should be written to the initial file anytime there was a change in data: employee status, expected ACA status, rate of pay (if being sent on the HR interface), work state, pay type, etc.

## Transactions to Include (for ongoing processing)

ADP Health Compliance will accept full files, including changes since the last HR file was produced. A full file consists of all employees that are active or on leave and any recent terminations. ADP recommends sending termination records for at least one month (from the date the status is keyed into the HR system) before dropping the record from the file.

#### Example 1:

• HR file sent to ADP on April 9th: John Smith's record was on this file, currently an active employee.

#### Activity in HR System

- April 11<sup>th</sup>: A termination for John Smith is keyed into the HR system
- April 12<sup>th</sup>: John Smith was rehired into another division and received a pay adjustment.
- Ongoing HR file sent to ADP on April 13<sup>th</sup> (runtime parameters 4/9 4/13):The file contains two records for John Smith
  - Record #1: Terminated status and updated status effective date
  - o Record #2: Active status (including new effective date), updated recent date of hire and updated pay rate/effective date.

#### Example 2:

• HR file sent to ADP on April 9<sup>th</sup>: Bob Jackson's record was on this file, currently an active employee.

Activity in HR System

- No changes are made to Bob Jackson's record between 4/9 and 4/13
- HR file sent to ADP on April 13<sup>th</sup> (runtime parameters 4/9 4/13): Bob Jackson's record is on this file, with the same information as the file April 9<sup>th</sup>.

## Ongoing Processing: Which Employees Should be Included?

All active employees and those currently on a leave of absence should be included on the file.

Terminated employees (e.g., terminated, retired, deceased, etc) should be included in at least one file. ADP prefers that they be included in all files for at least for one month to ensure accurate reporting.

## **Special Populations**

ADP Health Compliance has the ability to permanently exclude one or a group of participants from the average hours calculation. This process works for an employer where the employee or group of employees will <u>never</u> need to be included in a measurement period (as defined by the Affordable Care Act) and the population cannot be excluded from the HR interface.

If situations exist where employees can move into or out of roles which need to be included/excluded from the determination of average hours worked, the information passed on the interface will require special logic. These situations are employer specific and may impact how hire dates, employment status and other information is derived and passed to ADP Health Compliance.

## **Frequency of Data**

In order to perform accurate eligibility and affordability calculations, as well as annual filings, it is very important that the ADP Health Compliance system have timely, relevant data. It is required that the HR system send data to ADP Health Compliance twice weekly (at a minimum).

## **File Naming Convention**

Please reference the transmission summary document provided by the ADP Implementation Specialist.

# Fields Included on the Interface

Below are the fields that may be provided on the interface from the HR system. The format of the file is comma delimited (,). All data elements must contain a text qualifier (be encapsulated in quotations).

The first record (row 1) must contain the Element name identified in the table below.

Field	Element	Notes	Req?	Length*	Example
Number Client I	dentifiers				
1.	OrganizationOID	Unique 16 character COID assigned by ADP (included in the transmission summary document)	Y	16	2FA6CFC739A34284
2.	ClientId	The NetSecure ID assigned by ADP.	N	16	COMPABC
Employ	yee Identifiers				
3.	Future Use	Do Not Value	N	16	
4.	Employee_ID	The Employee ID assigned to the employee by the client system of record.  If records are matched using this value, the employee ID is required.  This value needs to be the same value sent from the client's benefit and payroll systems if SSN is not the key.  Client defined value.	CR	16	114781
5.	SocialSecurityNumber	The social security number of the employee.	Y	11	Format: XXXXXXXXX (preferred) Or XXX-XX-XXXX
6.	EmployeeFirstName	The first name of the employee.	Y	50	Benedict
7.	EmployeeMiddleName	The middle name of the employee.	N	50	Timothy

8.	EmployeeLastName	The last name of the employee.	Υ	50	Cumberbatch
9.	Gender	The gender of the employee.	N	1	M = Male F = Female U = Unknown
10.	BirthDate	The date of birth of the employee.	Y	10	Format: MM/DD/CCYY
Emplo	yment Status Data				
11.	RecentHireDate	If employee is hired for the first time, this should be the original Date of Hire.  If employee has been rehired by the company, this should be the most recent Date of Hire.	Y	10	Format: MM/DD/CCYY
12.	PreviousHireDate	If employee is hired for the first time or has been rehired by the company, this should be the original Date of Hire.	Y	10	Format: MM/DD/CCYY
13.	EmploymentStatus	Recommended Values:  A = Active T = Terminated L = Leave D = Deceased R = Retired  Other values are accepted and will need to be mapped within ADP HC.	Y	1	
14.	StatusEffectiveDate	The date the value in the Employment Status field became effective.	Y	10	Format: MM/DD/CCYY

dicat	ive Employment Data				
15.	EffectiveDateOfIndicativeData	Applies to all data in this section and the name fields on this import.  For each record written to the file, this date must be valued with the latest effective date of all the fields. The effective date of indicative pertains to EACH record written to the file for an employee, not the entire record set. If no Indicative Employment Data changes during the file extraction date range, the value of this date will be the same across all records for the employee.  The Effective Date of Indicative Data must be updated on the record in the file which includes the changed value.	Y	10	Format: MM/DD/CCYY
16.	WorkStateCode*	The employee's primary work state abbreviation.  If this field is empty, ADP HC uses the Federal Poverty Level of the mainland US for the FPL safe harbor test.	N	2	WA
17.	PayType*	Recommended Values: S = Salaried H = Hourly  Other values are accepted and will need to be mapped within ADP HC.	Y	1	
18.	UnionInd*	Valid Values: Y = Yes (Employee is Union) N = No (Employee is Non-Union)	N	1	
19.	UnionCode*	The code identifying a specific union.  Must be valued if Union Indicator is "Y"	CR	20	

20.	HRStatus	Recommended Values: F = Full Time P = Part Time	Y	1	
		Other values are accepted and will need to be mapped within ADP HC.			
21.	EmployeeType	Valid Values: R = Regular T = Temporary S = Seasonal C = Contractor	N	1	
22.	FederalEIN*	Format: 99999999 (preferred) OR 99-9999999	Y	10	Format: 999999999 (preferred) OR 99-9999999
23.	JobTitle	Client defined value.	N	50	
24.	CommonLawEE	Valid Values: Y = Yes N = No	N	1	
25.	OrgCode01	May be used for reporting/filtering of data.	N	50	
26.	OrgCode02	May be used for reporting/filtering of data.	N	50	
27.	OrgCode03	May be used for reporting/filtering of data.	N	50	
28.	OrgCode04	May be used for reporting/filtering of data.	N	50	
29.	OrgCode05	May be used for reporting/filtering of data.	N	50	

<sup>\*</sup> May be used to define a Category in ADP Health Compliance system.

- FEIN
- Work State
- PayType
- Union Indicator/Code

30.	PhoneNumber	Numeric only (remove formatting and country code)	Ν	10	
31.	PhoneExtn	Numeric only (remove formatting)	N	10	
32.	Email		N	50	
33.	AddressLine1	Current mailing address for employee as of export date.	Υ	50	
34.	AddressLine2		N	50	
35.	City		Υ	50	
36.	State	Must be 2 digit state, if Country Code is "US" (or empty).	Υ	64	
37.	ZipCode	Allows letters if country code is not US.	Υ	12	
38.	ZipCodeExtn		Ν	13	
39.	Country	Required if Mailing Address State/Province is not US.  Foreign country codes are identified in the IRS list "Foreign Country Code Listing for Modernized e-File (MeF)". This list can be found: <a href="http://www.irs.gov/Tax-Professionals/e-File-Providers-&amp;-Partners/Foreign-Country-Code-Listing-for-Modernized-e-File">http://www.irs.gov/Tax-Professionals/e-File-Providers-&amp;-Partners/Foreign-Country-Code-Listing-for-Modernized-e-File</a>	CR	2	Example: UK
<b>Termin</b>	nation Date and Expected A	CA Status			
40.	TermDate	If passed on the file, this should be the first day the terminated status was in effect.	CR	10	Format: MM/DD/CCYY
		If the record being passed on the file has an employment status of terminated (or is mapped to terminated), the TermDate should be valued.			

41.	ExpectedACAStatus	If this information is not provided, Forms 1095-C for "ACA FT" new hires and rehires may not be produced.  This is used to identify the expected ACA* status of employees when they are hired. Employees that are reasonably expected to average 30 or more hours of service per week MUST have an expected ACA status of FT.  If field is not valued, system assumes PT  * "Expected ACA status" is an ADP term.	N	2	Valid Values: FT = Full Time PT = Part Time
42.	ExpectedACAStatusEffectiveDate	This is the effective date of the expected ACA Status.  This field is required if the ExpectedACAStatus field is valued.	CR	10	Format: MM/DD/CCYY
• Fo	or any clients who utilize ADP AutoPa	import file, the information is not required on this file y for payroll, the wage information must be sent on the HR import. e and Annual Salary should be sent for each employee.			
43.	HourlyRate	Required if wage information is setup to be imported from the HR interface AND if pay type is "H" (or is mapped to "H").  Values less than 1.00 should only have one leading zero to the left of the decimal.  This is the hourly base wage rate. It should not include bonus, overtime, etc.  If both hourly wage and salary are provided for an employee, system will use the PayType to determine which field will be used in the Rate of Pay Safe Harbor calculation.	CR	14	Format: XXXXXXXXXXXX Examples: 0.00 12.50

44.	HourlyRateEffectiveDate	The effective date for the Hourly Wage Rate.	CR	10	Format: MM/DD/CCYY
		Required if hourly Wage Rate is provided.			
45.	AnnualSalary	Required if wage information is setup to be imported from the HR interface AND if pay type is "S" (or is mapped to "S").	CR	12	Format: XXXXXXXXXXXX
		This is the annual salary base rate.  If both hourly wage and salary are provided for an employee, system will use the PayType to determine which field will be			Examples: 0.00 50000.00
		used in the Rate of Pay Safe Harbor calculation.			
46.	SalaryEffectiveDate	The effective date for the Annual Salary.	CR	10	Format: MM/DD/CCYY
		Required if Annual Salary is provided.			

# **Footer Record (optional)**

The Footer record appears at the end of the file and is indicated by FOOT in the first field position of the row.

Field Position	Element	Notes	Req?	Length*	Example
1.	Footer	Constant "FOOT"	CR	10	FOOT
		Required if any fields in the footer record are passed in the file.			
2.	File Type	I – Initial F – Ongoing full file, with changes	N	1	F
		O – Other (ex: reconciliation file)			
3.	Source System	The name of the system the data is being sent from (examples: SAP, PeopleSoft, Enterprise)	N	100	PayForce
4.	Source System Version	Name or Version of the source system	N	100	2.4

5.	Spec Version	The version of the spec used for coding the extract	N	50	4.0
6.	Environment	Source of the data in the file, "Production" or "Test" environment	N	10	Production
7.	Contact Name	Name or UserID of the system or person who ran the export.	N	50	JSmith

<sup>\*</sup> Length: The maximum number of characters supported for each element/field

# **Appendix**

Sample Data

```
"OrganizationOID", "ClientIdentifier",, "EmployeeID", "SocialSecurityNumber", "EmployeeFirstName", "EmployeeMiddleNa
"G3M7XC5CECJJG1S2", "ACBCo",, "1111111", "111111111", "John",, "Smith", "M", "12/12/1980", "09/02/2012", "09/02/2012", "A
"G3M7XC5CECJJG1S2", "ACBCo",, "1111111", "111111111", "John",, "Smith", "M", "12/12/1980", "09/02/2012", "09/02/2012", "A",
"G3M7XC5CECJJG1S2", "ACBCo",, "1111111", "111111111", "John",, "Smith", "M", "12/12/1980", "09/02/2012", "09/02/2012", "A"
"G3M7XC5CECJJG1S2", "ACBCo",, "2222222", "1111111112", "Zachary",, "Wise", "M", "06/19/1972", "03/28/2017", "03/28/2017",
"G3M7XC5CECJJG1S2", "ACBCo",, "333333", "1111111113", "Susie",, "Jones", "F", "09/05/1997", "09/01/2017", "09/01/2017", "A
"G3M7XC5CECJJG1S2", "ACBCo",, "444444", "111111114", "Stacy",, "Smith", "F", "05/16/1991", "02/28/2017", "02/28/2017", "A
"G3M7XC5CECJJG1S2", "ACBCo", , "444444", "111111114", "Stacy", , "Smith", "F", "05/16/1991", "02/28/2017", "02/28/2017", "
"G3M7XC5CECJJG1S2", "ACBCo",, "555555", "1111111115", "Tim",, "Johnson", "M", "04/29/1995", "02/01/2014", "02/01/2014", "
"G3M7XC5CECJJG1S2", "ACBCo",, "555555", "1111111115", "Tim",, "Johnson", "M", "04/29/1995", "02/01/2014", "02/01/2014", "
"G3M7XC5CECJJG1S2", "ACBCo",, "5555555", "1111111115", "Tim",, "Johnson", "M", "04/29/1995", "01/28/2018", "02/01/2014", "A
"G3M7XC5CECJJG1S2", "ACBCo",, "6666666", "1111111116", "Mike",, "Keith", "M", "07/01/1994", "03/01/2013", "03/01/2013", "T
"G3M7XC5CECJJG1S2", "ACBCo",, "6666666", "1111111116", "Mike",, "Keith", "M", "07/01/1994", "10/01/2017", "03/01/2013", "A"
"G3M7XC5CECJJG1S2", "ACBCo",,"777777","1111111117","Hannah",,"Hall","M","12/15/1995","03/15/2015","03/15/2015","A
"G3M7XC5CECJJG1S2", "ACBCo",, "777777", "1111111117", "Hannah",, "Hall", "M", "12/15/1995", "03/15/2015", "03/15/2015", ""
"FOOT", "F", "PayForce", "2.04", "4.0", "Production", "JSmith"
```

# **File Spec Companion Information**

This section is to be used as a supplement to, and in conjunction with the technical file specification details above. The purpose is to provide additional information related to the requirements of this file, elements within the file and best practices related to the varying scenarios that one might encounter within their employee population.

## **Example Scenarios**

The following examples can be found in the sample file within the Attachments section of this document.

Scenario	Notes
Example 11111111: Existing Employee, Pay Changes  John Smith is an existing employee as of the historical extraction date. This record experienced multiple pay rate and indicative data changes.	<ul> <li>Record 1: First record and status</li> <li>Record 2: Pay change</li> <li>Record 3: Pay, pay type, job title, work state (including home address), and HR status change.</li> </ul>
Example 11111112: New Hire, Expected to Work >= 30 hrs/wk  Zachary Wise is a newly hired employee and expected to work more than 30 hours per week at date of hire.	<ul> <li>Record 1: Baseline record with new hire information,</li> <li><expected aca="" status=""> = FT and</expected></li> <li><expected aca="" date="" effective="" status=""> = hire date</expected></li> </ul>
Example 11111113: New Hire, Expected to Work < 30 hrs/wk  Susie Jones is a newly hired employee and expected to work less than 30 hours per week at date of hire.	<ul> <li>Record 1: Baseline record with new hire information,</li> <li><expected aca="" status=""> = PT and</expected></li> <li><expected aca="" date="" effective="" status=""> = hire date</expected></li> </ul>

Example 111111114: Newly Hired (PT), Promoted (FT)  Stacy Smith is a newly hired employee and expected to work less than 30 hours per week at date of hire. She is promoted a few months later and is now expected to work more than 30 hours per week from the date of promotion.	<ul> <li>Record 1: Baseline record with new hire information, <expected aca="" status=""> = PT and <expected aca="" date="" effective="" status=""> = hire date.</expected></expected></li> <li>Record 2: <expected aca="" status=""> = FT, <expected aca="" date="" effective="" status=""> = date of promotion, pay type, salary increase, and job title changes</expected></expected></li> </ul>
Example 11111115: Existing Employee, Multiple Status Changes  Tim Johnson is an existing employee who has multiple employment status changes in the sample file. He was newly hired, terminated employment and was rehired.	<ul> <li>Record 1: Active status, new hire information</li> <li>Record 2: Terminated status</li> <li>Record 3: Rehired, active status. Updated statuses, recent date of hire, and effective dates</li> </ul>
Example 11111116: Terminated Employee, Rehired  Mike Keith is in a terminated status as of the initial file extraction date, but is later rehired.	<ul> <li>Record 1: Terminated status, with original values for prior recent hire date, prior effective dates and values</li> <li>Record 2: Active status, with updated recent hire date, status effective date, expected aca status/effective date, wage and effective dates</li> </ul>
Example 11111117: Existing Employee, Later Terminated  Hannah Hall is in an active status as of the initial file extraction date, but is later terminated.	<ul> <li>Record 1: Active status, new hire information</li> <li>Record 2: Terminated status</li> </ul>

#### **Sample File:**

File Type	File
CSV	The sample file can be downloaded from the "Attachments" section of this document.

## **Additional Field Details**

#### <RecentHireDate>

This value needs to reflect the recent hire date at the time of the employment snapshot.

Below is an example of an employee with multiple changes and the corresponding value for the <RecentHireDate> on each of the HR event records.

## Example of an employee with 6 HR records

Sequence of HR Events	Value of Recent Hire Date on HR Record
New Hire record	Same as PreviousHireDate (Original Date of Hire)
Terminated record	No Change
Rehired record	Updated to be Rehire Date
Promotion/Raise record	No Change
Went on Leave record	No Change
Return from Leave record	No Change

<sup>\*</sup> If an employer has special employee populations (e.g. acquisitions, mergers, contract to hire, etc) the hire/status dates will need to be discussed and addressed with the Implementation or Data Integration Specialist.

#### <TermDate>

This field is not required in the initial HR file and will be ignored, if present. The status and status effective dates will be used to build an accurate employment history from the initial file.

This field should be valued in the ongoing HR file, if the record passed for the employee is a terminated status.

\* If the employer has a business practice of terminating and rehiring employees on the same day (many times in the case of a transfer between divisions), this scenario should be discussed with the Implementation or Data Integration Specialist.

#### <ExpectedACAStatus>

"An initial measurement period does not apply to new employees who are full-time employees (because they are reasonably expected at time of hire to average at least 30 hours of service per week for the months after hire), and so are not variable-hour, seasonal, or part-time employees. See Employer Shared Responsibility Final Regulations (26 CFR §54.4980H-3(d)(2))."

- The employer will identify new hires that are projected to work an average of 30 hours or more per week as **ExpectedACAStatus>** = "FT". These employees will not be placed in an initial measurement period (IMP), nor will they be assigned an initial stability period. They will be treated as ACA FT for the purposes of annual filing in the ADP Health Compliance Platform (ADP HC).
- New hires who are **ExpectedACAStatus** = "FT" are identified in the ADP HC through this field on the HR import file.
- Once an employee is included in the Ongoing Measurement Period cycle, the < ExpectedACAStatus> will not be used for IRS Filing; the calculated status will be used.

#### <ExpectedACAStatusEffectiveDate>

This date must be the date which correlates to the 'Expected ACA Status'.

ADP Health Compliance will use this information to determine (where applicable) limited non-assessment periods for IRS Filing, determine if compliant coverage was offered timely and when the affordability safe harbor needs to be calculated for a newly hired or rehired employee.

#### <WorkStateCode>

ADP Health Compliance primarily uses Work State to determine which Federal Poverty value to use, when calculating the Federal Poverty Level Safe Harbor.

- If an employee works in 2 different states, the state the employee works more of their time in should be passed on the HR interface.
- If an employee works in 2 states equal time, the state with the higher FPL should be passed.
  - o Alaska and Hawaii both have higher FPL's than the mainland US.
  - o The FPL for the lower 48 states is the same for all.
- If a value is not passed, ADP HC will use the FPL of the mainland US, when calculating the Federal Poverty Level Safe Harbor.

#### <PayType>

This value is used by the system to determine whether to use the Annual Salary or Hourly Rate of Pay when determining if a benefit offering was "affordable" under the Rate of Pay safe harbor.

- Values other than 'H' or 'S' are accepted, but need to be mapped in ADP Health Compliance.
  - o If a pay type value is not "H", "S", or mapped to one of these values, the wage information on the import will not be loaded.
  - o If this occurs, the Rate of Pay safe harbor in ADP Health Compliance will be reflected as "not affordable".
- The Rate of Pay Safe Harbor cannot be used for employees with a zero dollar hourly rate (piece work, paid by the mile) or salary (100% commissioned employees).

#### <HRStatus>

HR Status vs Expected ACA Status

- HR Status is a designation which varies by client, whereas Expected ACA Status is designation specifically designed to address requirements from the Affordable Care Act.
- **ExpectedACAStatus>** = "FT" denotes that an employee is hired, rehired, or promoted into a position where the employer expects them to work more than 30 hours per week. This value (and effective date) are used to accurately report an employee as ACA full-time, when they would otherwise be put into a new hire measurement period (and wait for the measurement period end date) before being calculated and designated as ACA full-time or ACA part-time. This status is not used, once an employee is able to have their average hours calculated as part of the employer's standard (ongoing) measurement period.
- For some clients, an employee who is "Expected ACA FT" may be HR part-time for other business processes within the company's HR system. For example a person may be expected to work 32 hours, and considered HR part-time and not accrue vacation or benefit from the same 401K match as an employee who is HR full-time.
  - (This is an example. HR designations, benefits and businesses processes vary by client.)

#### <FederalEIN>

The Federal EIN on the HR import is used in a couple key areas of ADP Health Compliance.

#### Notice of Coverage (NOC)

- This is the FEIN used when NOCs are sent to newly hired employees.
- If the FEIN is left empty the NOC cannot be sent. The FEIN will have to be updated and then the form can be produced.

#### 1095c Forms

- At the time of IRS reporting, if an employee is determined to need a 1095c form, the FEIN(s) from the employee's payroll record(s) are used.
- If there is a situation where an employee does not have payroll records (or an FEIN is not being sent from the payroll system), the FEIN on the HR import will be used on the 1095c.
  - The most common scenario where the HR FEIN is used for reporting is when an employee falls into a multi-employer situation and is offered benefits by a union or other collective bargaining unit, to which the employer contributes.

## **Document Revisions**

Version	Date	Author	Description
4.0	6/1/2018	J. Johnson	Clarified Initial (formerly Historical) file and information to include Clarified example of ongoing file with changes Clarified Effective Date of Indicative Data Incorporated Companion document details into the file specification (including example scenarios, sample file, and select field-level details) Updated dates and content within the sample file
			Removed notes regarding the "future" enforcement of the effective date of indicative data and Federal EIN
3.2	04/10/2017	J. Johnson	OrganizationOID: Updated description Effective Date of Indicative Data: Optional > Required Special Populations: added note File Type: Enhanced Descript for 'F' – Ongoing full file, with changes. Example added for 'O'
3.0	6/13/2016	J. Johnson	Initial document  • .csv version of HR import newly supported