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Pay or Play Penalty—IRS Examples for Determining Full-time Status

Under section 4980H of the Affordable Care Act (ACA), large employers may be subject to a penalty if they do not offer health coverage to their full-time employees (and dependents) or if they offer coverage that is unaffordable or does not provide minimum value. Employers with **50 or more full-time employees**, including full-time equivalents, on business days during the preceding calendar year are considered large employers.

> The employer mandate provisions were set to take effect on Jan. 1, 2014. However, on July 2, 2013, the Treasury announced the **delay of the employer mandate penalties and related reporting requirements for one year, until 2015.** Therefore, these payments will not apply for 2014. On July 9, 2013, the IRS issued Notice 2013-45 to provide more formal guidance on the delay. No other provisions of the ACA were affected by the delay.

On Feb. 10, 2014, the Internal Revenue Service (IRS) issued **final regulations** on the ACA's employer penalty provisions. The final regulations include transition rules to help employers come into compliance with the employer mandate. Under these rules, the employer mandate will generally apply to:

- Applicable large employers with **100 or more** full-time employees starting in **2015**; and
- Applicable large employers with **50-99** full-time employees starting in **2016**.

LOOK-BACK MEASUREMENT METHOD

The ACA defines a full-time employee as an employee who is employed on average for at least **30 hours** of service per week. The final regulations provide guidance on an optional safe harbor method for identifying full-time employees for purposes of calculating an employer's potential liability for a shared responsibility payment. This method is called the "**look-back measurement method**."

Employers that intend to utilize the look-back measurement method for determining full-time status for 2015 will need to begin their measurement periods in 2014 to have corresponding stability periods in 2015. The IRS recognizes that employers that intend to adopt a 12-month measurement period and a 12-month stability period will face time constraints. Under the final regulations' transition relief, for purposes of stability periods beginning in 2015, employers may adopt a transition measurement period that:

- Is shorter than 12 consecutive months, but not less than 6 consecutive months long; and
- Begins no later than July 1, 2014, and ends no earlier than 90 days before the first day of the plan year beginning on or after Jan. 1, 2015.

For example, an employer with a calendar year plan may use a measurement period from April 15, 2014, through Oct. 14, 2014 (six months), followed by an administrative period ending on Dec. 31, 2014. An employer with a plan year beginning April 1 that also elected to implement a 90-day administrative period could use a measurement period from July 1, 2014, through Dec. 31, 2014 (six months), followed by an administrative period ending on March 31, 2015.

However, an employer with a plan year beginning on July 1 must use a measurement period that is longer than 6 months to comply with the requirement that the measurement period begin no later than July 1, 2014, and end no earlier than 90 days before the stability period. For example, the employer may have a 10-month measurement period from June 15, 2014, through April 14, 2015, followed by an administrative period from April 15, 2015, through June 30, 2015.

To help explain the look-back measurement method for identifying full-time employees, the final regulations include numerous examples. The examples address the methods for ongoing employees and new variable hour, part-time and seasonal employees.

EXAMPLE OF ONGOING EMPLOYEES

Facts—Employer Z, a large employer, chooses to use a 12-month stability period that begins Jan. 1 and a 12-month standard measurement period that begins Oct. 15. Consistent with the terms of Employer Z's group health plan, only employees classified as full-time employees using the look-back measurement method are eligible for coverage. Employer Z chooses to use an administrative period between the end of the standard measurement period (Oct. 14) and the beginning of the stability period (Jan. 1) to:

- Determine which employees were employed on average 30 hours of service per week during the measurement period;
- Notify them of their eligibility for the plan for the calendar year beginning on Jan. 1 and of the coverage available under the plan;
- Answer questions and collect materials from employees; and
- Enroll those employees who elect coverage in the plan.

Previously-determined full-time employees already enrolled in coverage continue to be offered coverage through the administrative period. Employee A and Employee B have been employed by Employer Z for several years, continuously from their start date. Employee A was employed on average 30 hours of service per week during the standard measurement period that begins Oct. 15, 2015, and ends Oct. 14, 2016, and for all prior standard measurement periods. Employee B also was employed on average 30 hours of service per week for all prior standard measurement periods, but averaged less than 30 hours of service per week during the standard measurement period that begins Oct. 15, 2015 and ends Oct. 14, 2016.

Conclusions—Because Employee A was employed for the entire standard measurement period that begins Oct. 15, 2015, and ends Oct. 14, 2016, Employee A is an ongoing employee with respect to the stability period running from Jan. 1, 2017, through Dec. 31, 2017. Because Employee A was employed on average 30 hours of service per week during that standard measurement period, Employee A is offered coverage for the entire 2017 stability period (including the administrative period from Oct. 15, 2017, through Dec. 31, 2017).

Because Employee A was employed on average 30 hours of service per week during the prior standard measurement period, Employee A is offered coverage for the entire 2016 stability period and, if enrolled, would continue such coverage during the administrative period from Oct. 15, 2016, through Dec. 31, 2016.

Because Employee B was employed for the entire standard measurement period that begins Oct. 15, 2015, and ends Oct. 14, 2016, Employee B is also an ongoing employee with respect to the stability period in 2017. Because Employee B was not a full-time employee based on hours of service during this standard measurement period, Employee B is not offered coverage for the stability period in 2017 (including the administrative period from Oct. 15, 2017, through Dec. 31, 2017). However, because Employee B was employed on average 30 hours of service per week during the prior standard measurement period, Employee B is offered coverage through the end of the 2016 stability period and, if enrolled, would continue such coverage during the administrative period from Oct. 15, 2016, through Dec. 31, 2016.

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Employer Z complies with the final regulations' methodology for ongoing employees because the standard measurement period is no longer than 12 months, the stability period for ongoing employees who are full-time employees based on hours of service during the standard measurement period is not shorter than the standard measurement period, the stability period for ongoing employees who are not full-time employees based on hours of service during the standard measurement period is no longer than the standard measurement period, and the administrative period is no longer than 90 days.

EXAMPLES OF NEW VARIABLE HOUR, PART-TIME AND SEASONAL EMPLOYEES

The examples that follow illustrate the look-back measurement methods for new variable employees, new seasonal employees and new part-time employees. In all of the following examples, the large employer has 200 full-time employees and offers all of its full-time employees (and their dependents) the opportunity to enroll in minimum essential coverage under an eligible employer-sponsored plan. The coverage is affordable and provides minimum value.

New Variable Employees with an Administrative Period

In Examples 1-8, the new employee is a new variable hour employee. The employer has chosen to use a 12-month standard measurement period for ongoing employees starting Oct. 15 and a 12-month stability period associated with that standard measurement period starting Jan. 1. Thus, during the administrative period from Oct. 15 through Dec. 31 of each calendar year, the employer continues to offer coverage to employees who qualified for coverage for that entire calendar year based upon having an average of at least 30 hours per week during the prior standard measurement period.

Example 1 *(12-Month Initial Measurement Period Followed by 1+ Partial Month Administrative Period)*

Facts—For new variable hour employees, Employer Z uses a 12-month initial measurement period that begins on the start date and applies an administrative period from the end of the initial measurement period through the end of the first calendar month beginning on or after the end of the initial measurement period. Employer Z hires Employee A on May 10, 2015. Employee A's initial measurement period runs from May 10, 2015, through May 9, 2016. Employee A has an average of 30 hours of service per week during this initial measurement period. Employer Z offers coverage that provides minimum value to Employee A for a stability period that runs from July 1, 2016, through June 30, 2017. For each calendar month during the period beginning with June 2015 and ending with June 2016, Employee A is otherwise eligible for an offer of coverage with respect to the coverage that is offered to Employee A on July 1, 2016.

Conclusion— Employer Z uses an initial measurement period that does not exceed 12 months; an administrative period totaling not more than 90 days; and a combined initial measurement period and administrative period that does not last beyond the final day of the first calendar month beginning on or after the one-year anniversary of Employee A's start date.

Accordingly, Employer Z complies with the standards for the initial measurement period and stability periods for a new variable hour employee. Employer Z will not be subject to an assessable payment under section 4980H(a) with respect to Employee A for any calendar month from June 2015 through June 2016 because, for each month during that period, Employee A is otherwise eligible for an offer of coverage and because coverage is offered no later than the end of the initial measurement period plus the associated administrative period (July 1, 2016).

Employer Z will not be subject to an assessable payment under section 4980H(b) with respect to Employee A for any calendar month from June 2015 through June 2016 because the coverage Employer Z offers to Employee A provides minimum value. Employer Z will not be subject to an assessable payment under section 4980H(a) or (b) with respect to Employee A for May 2015 because an applicable large employer member is not subject to an assessable payment under section 4980H with respect to an employee for the calendar month in which falls the employee's start date if the start date is on a date other than the first day of the calendar month. Employer Z must test Employee A again based on the period from Oct. 15, 2015, through Oct. 14, 2016 (Employer Z's first standard measurement period that begins after Employee A's start date).

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Example 2 *(11-Month Initial Measurement Period Followed by 2+ Partial Month Administrative Period)*

Facts—Same as Example 1, except that Employer Z uses an 11-month initial measurement period that begins on the start date and applies an administrative period from the end of the initial measurement period until the end of the second calendar month beginning after the end of the initial measurement period. Employee A's initial measurement period runs from May 10, 2015, through April 9, 2016. The administrative period associated with Employee A's initial measurement period ends on June 30, 2016. Employee A has an average of 30 hours of service per week during this initial measurement period.

Conclusion—Same as Example 1.

Example 3 *(11-Month Initial Measurement Period Preceded by Partial Month Administrative Period and Followed by 2-Month Administrative Period)*

Facts—Same as Example 1, except that Employer Z uses an 11-month initial measurement period that begins on the first day of the first calendar month beginning after the start date and applies an administrative period that runs from the end of the initial measurement period through the end of the second calendar month beginning on or after the end of the initial measurement period. Employee A's initial measurement period runs from June 1, 2015, through April 30, 2016. The administrative period associated with Employee A's initial measurement period ends on June 30, 2016. Employee A has an average of 30 hours of service per week during this initial measurement period.

Conclusion—Same as Example 1.

Example 4 *(12-Month Initial Measurement Period Preceded by Partial Month Administrative Period and Followed by 2-Month Administrative Period)*

Facts— For new variable hour employees, Employer Z uses a 12-month initial measurement period that begins on the first day of the first month following the start date and applies an administrative period that runs from the end of the initial measurement period through the end of the second calendar month beginning on or after the end of the initial measurement period. Employer Z hires Employee A on May 10, 2015. Employee A's initial measurement period runs from June 1, 2015, through May 31, 2016. Employee A has an average of 30 hours of service per week during this initial measurement period. Employer Z offers coverage to Employee A for a stability period that runs from Aug. 1, 2016, through July 31, 2017.

Conclusion— Employer Z does not satisfy the standards for the look-back measurement method because the combination of the initial partial month delay, the 12-month initial measurement period, and the two month administrative period means that the coverage offered to Employee A does not become effective until after the first day of the second calendar month following the first anniversary of Employee A's start date. Accordingly, Employer Z is potentially subject to an assessable payment under section 4980H for each full calendar month during the initial measurement period and associated administrative period.

Example 5 *(Continuous Full-Time Employee)*

Facts—Same as Example 1; in addition, Employer Z tests Employee A again based on Employee A's hours of service from Oct. 15, 2015, through Oct. 14, 2016 (Employer Z's first standard measurement period that begins after Employee A's start date), determines that Employee A has an average of 30 hours of service per week during that period, and offers Employee A coverage for July 1, 2017, through Dec. 31, 2017. (Employee A already has an offer of coverage for the period of Jan. 1, 2017, through June 30, 2017, because that period is covered by the initial stability period following the initial measurement period, during which Employee A was determined to be a full-time employee.)

Conclusion—Employer Z is not subject to any payment under section 4980H for any calendar month during 2017 with respect to Employee A.

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Example 6 *(Initially Full-Time Employee, Becomes Non-Full-Time Employee)*

Facts—Same as Example 1; in addition, Employer Z tests Employee A again based on Employee A's hours of service from Oct. 15, 2015, through Oct. 14, 2016 (Employer Z's first standard measurement period that begins after Employee A's start date), and determines that Employee A has an average of 28 hours of service per week during that period. Employer Z continues to offer coverage to Employee A through June 30, 2017 (the end of the stability period based on the initial measurement period during which Employee A was determined to be a full-time employee), but does not offer coverage to Employee A for the period of July 1, 2017, through Dec. 31, 2017.

Conclusion— Employer Z is not subject to any payment under section 4980H for any calendar month during 2017 with respect to Employee A.

Example 7 *(Initially Non-Full-Time Employee)*

Facts—Same as Example 1, except that Employee A has an average of 28 hours of service per week during the initial measurement period (May 10, 2015, through May 9, 2016), and Employer Z does not offer coverage to Employee A for any calendar month in 2016.

Conclusion— From Employee A's start date through the end of 2016, Employer Z is not subject to any payment under section 4980H with respect to Employee A, because Employer Z complies with the standards for the measurement and stability periods for a new variable hour employee with respect to Employee A and because under those standards, Employee A is not a full-time employee for any month during 2016.

Example 8 *(Initially Non-Full-Time Employee, Becomes Full-Time Employee)*

Facts—Same as Example 7; in addition, Employer Z tests Employee A again based on Employee A's hours of service from Oct. 15, 2015, through Oct. 14, 2016 (Employer Z's first standard measurement period that begins after Employee A's start date), determines that Employee A has an average of 30 hours of service per week during this standard measurement period, and offers coverage to Employee A for 2017.

Conclusion— Employer Z is not subject to any payment under section 4980H for any calendar month during 2017 with respect to Employee A.

New Variable Hour Employees with an Administrative Period and Six-Month Standard Measurement Period and Stability Period

In Examples 9 and 10, the new employee is a variable hour employee and the employer uses a six-month standard measurement period, starting each May 15 and Nov. 15, with six-month stability periods associated with those standard measurement periods starting Jan. 1 and July 1.

Example 9 *(Initially Full-Time Employee)*

Facts— For new variable hour employees, Employer Y uses a six-month initial measurement period that begins on the start date and applies an administrative period that runs from the end of the initial measurement period through the end of the first full calendar month beginning after the end of the initial measurement period. Employer Y hires Employee B on May 10, 2015. Employee B's initial measurement period runs from May 10, 2015, through Nov. 9, 2015, during which Employee B has an average of 30 hours of service per week. Employer Y offers coverage that provides minimum value to Employee B for a stability period that runs from Jan. 1, 2016, through June 30, 2016. For each calendar month during the period from June 2015 through December 2015, Employee B is otherwise eligible for an offer of coverage with respect to the coverage that is offered to Employee B on Jan. 1, 2016.

For new variable hour employees, Employer C uses a six-month initial measurement period that begins on the start date and applies an administrative period that runs from the end of the initial measurement period through the end of the first full calendar month beginning after the end of the initial measurement period. Employer C hires Employee Z on May 10, 2015. Employee Z's initial measurement period runs from May 10, 2015, through Nov. 9, 2015, during

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which Employee Z has an average of 30 hours of service per week. Employer C offers coverage to Employee Z for a stability period that runs from Jan. 1, 2016, through June 30, 2016.

Conclusion— Employer Y uses an initial measurement period that does not exceed 12 months; an administrative period totaling not more than 90 days; and a combined initial measurement period and administrative period that does not extend beyond the final day of the first calendar month beginning on or after the one-year anniversary of Employee B's start date. Employer Y complies with the standards for the measurement and stability periods for a new variable hour employee with respect to Employee B.

Employer Y is not subject to an assessable payment under section 4980H(a) with respect to Employee B for any calendar month from June 2015 through December 2015 because, for each month during that period, Employee B is otherwise eligible for an offer of coverage and because Employee B is offered coverage no later than the end of the initial measurement period plus the associated administrative period (Jan, 1, 2016).

Employer Y is not subject to an assessable payment under section 4980H(b) with respect to Employee B for any calendar month from June 2015 through December 2015 because the coverage Employer Y offers to Employee B no later than Jan. 1, 2016, provides minimum value.

Employer Y is not subject to an assessable payment under section 4980H(a) or (b) with respect to Employee B for May 2015 because an applicable large employer member is not subject to an assessable payment under section 4980H with respect to an employee for the calendar month in which falls the employee's start date if the start date is on a date other than the first day of the calendar month. Employer Y must test Employee B again based on Employee B's hours of service during the period from Nov. 1, 2015, through April 30, 2016 (Employer Y's first standard measurement period that begins after Employee B's start date).

Example 10 *(Initially Full-Time Employee, Becomes Non-Full-Time Employee)*

Facts—Same as Example 9; in addition, Employer Y tests Employee B again based on Employee B's hours of service during the period from Nov. 1, 2015, through April 30, 2016 (Employer Y's first standard measurement period that begins after Employee B's start date), during which period Employee B has an average of 28 hours of service per week. Employer Y continues to offer coverage to Employee B through June 30, 2016 (the end of the initial stability period based on the initial measurement period during which Employee B has an average of 30 hours of service per week), but does not offer coverage to Employee B from July 1, 2016, through Dec. 31, 2016.

Conclusion— Employer Y is not subject to any payment under section 4980H with respect to Employee B for any calendar month during 2016.

Seasonal Employee Classification

Example 11 *(Seasonal Employee, 12-Month Initial Measurement Period; 1+ Partial Month Administrative Period)*

Facts— Employer X offers health plan coverage only to full-time employees (and their dependents). Employer X uses a 12-month initial measurement period for new seasonal employees that begins on the start date and applies an administrative period from the end of the initial measurement period through the end of the first calendar month beginning after the end of the initial measurement period. Employer X hires Employee C, a ski instructor, on Nov. 15, 2015, with an anticipated season during which Employee C will work running through March 15, 2016. Employee C's initial measurement period runs from Nov. 15, 2015, through Nov. 14, 2016.

Conclusion— Employer X determines that Employee C is a seasonal employee because Employee C is hired into a position for which the customary annual employment is six months or less. Accordingly, Employer X may treat Employee C as a seasonal employee during the initial measurement period.

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Variable Hour Employees—Temporary Staffing Firm

In Examples 12, 13 and 14, the employer is in the trade or business of providing temporary workers to numerous clients that are unrelated to the employer and to one another. The employer is the common law employer of the temporary workers based on all of the facts and circumstances. The employer offers health plan coverage only to full-time employees (including temporary workers who are full-time employees) and their dependents. The employer uses a 12-month initial measurement period for new variable hour employees that begins on the start date and applies an administrative period from the end of the initial measurement period through the end of the first calendar month beginning after the end of the initial measurement period.

Example 12

Facts— Employer W hires Employee D on Jan. 1, 2015, in a position under which Employer W will offer assignments to Employee D to provide services in temporary placements at clients of Employer W, and employees of Employer W in the same position as Employee D, as part of their continuing employment, retain the right to reject an offer of placement. Employees of Employer W in the same position of employment as Employee D typically perform services for a particular client for 40 hours of service per week for a period of less than 13 weeks, and for each employee there are typically periods in a calendar year during which Employer W does not have an assignment to offer the employee. At the time Employee D is hired by Employer W, Employer W has no reason to anticipate that Employee D's position of employment will differ from the typical employee in the same position.

Conclusion— Employer W cannot determine whether Employee D is reasonably expected to average at least 30 hours of service per week for the 12-month initial measurement period. Accordingly, Employer W may treat Employee D as a variable hour employee during the initial measurement period.

Example 13

Facts— Employer V hires Employee E on Jan. 1, 2015, in a position under which Employer V will offer assignments to Employee E to provide services in temporary placements at clients of Employer V. Employees of Employer V in the same position of employment as Employee E typically are offered assignments of varying hours of service per week (so that some weeks of the assignment typically result in more than 30 hours of service per week and other weeks of the assignment typically result in less than 30 hours of service per week). Although a typical employee in the same position of employment as Employee E rarely fails to have an offer of an assignment for any period during the calendar year, employees of Employer V in the same position of employment, as part of their continuing employment, retain the right to reject an offer of placement, and typically refuse one or more offers of placement and do not perform services for periods ranging from four to twelve weeks during a calendar year. At the time Employee E is hired by Employer V, Employer V has no reason to anticipate that Employee E's position of employment will differ from the typical employee in the same position.

Conclusion— Employer V cannot determine whether Employee E is reasonably expected to average at least 30 hours of service per week for the 12-month initial measurement period. Accordingly, Employer V may treat Employee E as a variable hour employee during the initial measurement period.

Example 14

Facts—Employer T hires Employee F on Jan. 1, 2015, in a position under which Employer T will offer assignments to Employee F to provide services in temporary placements at clients of Employer T. Employees of Employer T in the same position typically are offered assignments of 40 or more hours of service per week for periods expected to last for periods of three months to 12 months, subject to a request for renewal by the client. Employees of Employer T in similar positions to Employee F are typically offered and take new positions immediately upon cessation of a placement. At the time Employee F is hired by Employer T, Employer T has no reason to anticipate that Employee F's position of employment will differ from the typical employee in the same position.

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Conclusion—Employer T must assume that Employee F will be employed by Employer T and available for an offer of temporary placement for the entire initial measurement period. Under that assumption, Employer T would reasonably determine that Employee F is reasonably expected to average at least 30 hours of service per week for the 12-month initial measurement period. Accordingly, Employer T may not treat Employee F as a variable hour employee during the initial measurement period.

Variable Hour Employee Classification

Example 15

Facts—Employee G is hired on an hourly basis by Employer S to fill in for employees who are absent and to provide additional staffing at peak times. Employer S expects that Employee G will average 30 hours of service per week or more for Employee G's first few months of employment, while assigned to a specific project, but also reasonably expects that the assignments will be of unpredictable duration, that there will be periods of unpredictable duration between assignments, that the hours per week required by subsequent assignments will vary, and that Employee G will not necessarily be available for all assignments.

Conclusion— Employer S cannot determine whether Employee G is reasonably expected to average at least 30 hours of service per week for the initial measurement period. Accordingly, Employer S may treat Employee G as a variable hour employee during the initial measurement period.

Period Between Initial Stability Period and Standard Stability Period

Example 16

Facts—Employer R uses an 11-month initial measurement period for new variable hour, new seasonal, and new part-time employees with an administrative period that lasts from the end of the initial measurement period through the last day of the first calendar month beginning on or after the first anniversary of the employee's start date. Employer R uses a standard measurement period of Oct. 15 through Oct. 14, and an administrative period of Oct. 15 through Dec. 31. Employee H is hired as a variable hour employee on Oct. 20, 2015, with an initial measurement period of Oct. 20, 2015, through Sept. 19, 2016, and an administrative period lasting through Nov. 30, 2016. Employee H is a full-time employee based on the hours of service in the initial measurement period, and Employee H's stability period for the initial measurement period is Dec. 1, 2016, through Nov. 30, 2017. Employee H's first full standard measurement period begins on Oct. 15, 2016, with an associated stability period beginning on Jan. 1, 2018. The standard measurement period beginning on Oct. 15, 2015, does not apply to Employee H because Employee H is not hired until Oct. 20, 2015.

Conclusion—For the period after the stability period associated with the initial measurement period and before the stability period associated with Employee H's first full standard measurement period (that is Dec. 1, 2017, through Dec. 31, 2017), Employer R must treat Employee H as a full-time employee because the treatment as a full-time employee (or not a full-time employee) that applies during the stability period associated with the initial measurement period continues to apply until the beginning of the stability period associated with the first full standard measurement period during which the employee is employed.

Source: Internal Revenue Service

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