The Affordable Care Act and WPI Guidelines

Under the Affordable Care Act (ACA), there are a number of requirements for employers that require WPI to track employee hours and report them to the federal government.

Employer Mandate

The employer mandate under the ACA went into effect January 1, 2015. As part of the employer mandate, WPI is required to offer healthcare coverage to employees who work an average of 30 or more hours per week based on a defined **measurement period** (WPI has designated an 11-month measurement period from January 1 to November 30). The new hire measurement period is 11 continuous months starting at date of hire.

If an employee meets eligibility requirements and continues to be employed in any capacity after the measurement period, they will be offered health insurance during WPI's stability period (January 1 to December 31). All positions are remeasured each year to determine eligibility in the WPI health plan. If workload requirements are not met, insurance will not be offered during the next **stability period**, which is the length of time employees maintain benefits once they are eligible (WPI's stability period coincides with our healthcare plan, January 1 to December 31).

During the measurement period, WPI will track the workload of all employees not currently offered health insurance. If an employee ends up working an average of at least 30 hours per week annually and continues to be employed in any capacity after the measurement period, they will be offered health insurance.

Information is relayed during the designated **administrative period** (the time used to determine who is eligible for benefits and communicate the appropriate information).

Determining Employee Eligibility for WPI Health Insurance

Adjunct Faculty

Under the Affordable Care Act, WPI will calculate adjunct faculty health insurance eligibility based on credit hours and full-time equivalent (FTE) status. WPI established a workload metric **measurement factor** equating each credit hour to 6.77 overall hours worked. This number incorporates actual hours worked plus additional required activity such as office hours. Based on this metric, a faculty member who averages 4.5 credit hours for four terms (the **measurement period** for adjunct faculty), a total of 18 credits over the four terms, and an FTE of .75% are eligible for health coverage through the ACA.

Adjunct faculty members may work 4.5 credit hours or greater for several terms per year but do not average out to 4.5 credits based on the four-term measurement period. This type of appointment is considered "seasonal" and healthcare is not offered.

Temporary Current Employees

Under the Affordable Care Act, temporary current employees whose actual measured hours (the **measurement factor**) average 30 hours weekly or more during the January 1 to December 31 **measurement period** are eligible to receive health insurance. The position will be reevaluated annually.

Supervisors should monitor the temporary employee's workload throughout the employment period to determine if any adjustments are needed. The new hire's workload average is also reviewed at the 12-month anniversary of the date of hire.

Temporary New Employees

Under the Affordable Care Act, temporary new employees who are expected to work actual measured hours (the **measurement factor**) of 30 hours a week or more during the January 1 to December 31 **measurement period** are eligible to

receive health insurance during the stability period. The position will be reevaluated annually.

Note: An employee is considered a new hire if they have not been employed by the university within the past 26 weeks. If the gap in employment is less than 26 weeks, the new assignment is considered a continuation of their previous workload within the measurement period.

Stipend Positions (assistant coaches and club advisors)

Under the Affordable Care Act, most of WPI's stipend positions are considered "seasonal employees." A seasonal employee is any employee who is hired into a position for which the customary annual employment is six months or less. Seasonal employees are not required to be offered health coverage under the ACA.