

Ensuring ACA Compliance ~ Tips for HRIS

The purpose of this document is to explain to agencies what information in HRIS (including ETE) must be accurate to ensure ACA compliance.

Employee Demographic Information

- Ensure that Employee information in HRIS is accurate as this appears on the 1094/1095-C statements provided to employees and the IRS.
 - Critical fields are Social Security Number, full name, address, and date of birth
- Ensure that dependent information in HRIS is accurate as this appears on the 1094/1095-C statements provided to employees and the IRS.
 - Dependent Social Security Numbers are required on the 1095-C statements and may result in a fine if not provided accurately.
 - Please note the following guidelines regarding dependent Social Security Number:
 - If an agency makes a “reasonable effort” to obtain the Social Security Number of the covered dependents, including spouses and children, the IRS may not assess penalty if the report has the birth date in place of the Social Security Number.
 - In order to be deemed to have made a “reasonable effort,” the agency must make two written attempts to obtain the Social Security Number. Please save copies of any communication regarding these attempts.

Hire Date

- Hire date must be accurate to determine if an employee is ACA ongoing or ACA new hire.
- Hire date means the employee’s first day of work performed upon hire or, if the employee has a break in service for at least one day, the employee’s first day of work performed upon rehire.

Termination Date

- If an individual is no longer an employee of the State, termination date must be populated.
- Knowing when the employee became inactive is critical in regards to reporting accurate information on the 1095-C statements.

EE Status Code

- Always ensure that the employee status code is correct. Status code is the key indicator of whether an employee is benefit eligible or not and whether employee is considered an active or inactive employee.
- Prior to changing an employee status code to a non-benefit eligible status (e.g. D2, C3), make sure you know the employee’s current benefit eligibility for the applicable stability period.

ACA Designation User Field

- Knowing the employee’s current ACA designation is critical. There are two components to knowing the ACA designation. The first is to determine whether an employee is considered an ongoing or new hire. The second is to determine whether the employee is considered Full-Time, Part-Time, Variable or Seasonal.

HRIS Info

- To add or update an employee's ACA designation, use the HRIS / XP52 Personnel Action (PA Action = "App Hire / Rehire 2" action or "User Field Change" action) form
- To view the employee's current ACA designation code, open Employee Record (HR11) and click on the User Field tab.

Time Recording (ETE or Paper Timesheet)

- Ensure time records are accurate as they are used to calculate hours at the end of each measurement period. Ensure all hours that are counted towards the "30 hour rule" are properly recorded in HRIS. *If there is an IRS audit, these time records will need to be available to defend an employee's hours.*
- Properly track FMLA hours, especially any FMLA hours that an employee is not being paid (e.g., unpaid FMLA).