

Appendix F

LOOK-BACK MEASUREMENT METHOD OF DETERMINING FULL-TIME STATUS

For new employees who are not expected to work a full-time schedule, the College will determine their full-time status for purposes of group medical insurance using the look-back measurement method permitted under the Affordable Care Act (ACA). The College will also use this method on an ongoing basis for eligible employees who become “continuing employees” as defined below.

The look-back measurement will apply upon hire to the following non-full-time employees:

- Part-time employees who work fewer than 30 hours per week or 130 per month, including temporary employees and adjunct faculty. For adjunct faculty, 1 unit is equivalent to 2.5 hours of service per week.
- Seasonal employees, defined as an employee who is hired into a position for which the customary annual employment is six months or less. “Customary” means employment generally occurring at the same time each year.
- Variable hour employees. A person is a variable hour employee if, based on the facts and circumstances available at the time of hire, it cannot be determined that the employee is reasonably expected to work on average at least 30 hours per week.

Under the look-back measurement method, non-full-time employees complete an initial measurement period of 12 months beginning on the employee’s start date, during which they are not eligible for group health coverage. (“Start date” is the first date an employee performs an hour of service for the College.) At the end of that period the College will take a 1 month period of time (the “initial administrative period”) to review payroll records to determine whether or not the employee averaged 30 or more hours of service over the initial measurement period. Those who did will receive an offer of coverage for a 12-month period (the “initial stability period”) which, if accepted, will remain in place even if the employee’s hours of service are reduced during that time. An employee who fails to work on average at least 30 hours of service per week during his or her initial measurement period is not eligible for coverage during the corresponding stability period.

A similar look-back measurement cycle applies on an ongoing basis to all College employees:

- The “standard measurement period” runs from January 1 through December 31.
- The “standard administrative period” runs from January 1 through the last day of February, during which time open enrollment occurs.
- The “standard stability period” runs from March 1 through February 28 of the following year.

A newly hired employee will become an “ongoing employee” whose hours of service are tracked on the “standard” cycle once he or she has remained employed for an entire standard measurement period: January 1 through December 31.