Affordable Care Act Generating and Maintaining ACA Period Records for 1095 Reporting in EERP

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TABLE OF CONTENTS

Overview	3
ACA Command Center	3
☐ Step #1 -Mass Generate Initial ACA Period Records	3
☐ Step #2 - ACA Standard Period Records - 2024	5
☐ Step #3 - Mark "Coverage Offered" on Standard Period Records	8
□ Step #4 - Import "Coverage Offered" for Initial Period Records	10
□ Step #5 - Adjust ACA Period Records as Needed	11
Scenario #1: PT/Substitute that becomes a Full-Time Employee	11
Scenario #2: Full-Time Employee that transfers into your school district	13
□ Step #6 - Import Health Insurance Dependents	14
Employee Dependent Import	15
Import Errors	16
Review Dependent Records – CRUCIAL!	17
□ Step #7 - Importing Participant (Employee) Coverage Dates	18
Import Errors	20
☐ Step #8 - Generate 1095s	20
☐ Step #9 - Generate Period Records for Future Years	21
Generate Standard Records for 2025.	21
Generate Standard Records for 2026	21

Overview

This document is intended to provide Kentucky school districts with an explanation of the Affordable Care Act (ACA) Period Tracking functionality in Enterprise ERP (EERP/Munis). Users who understand the Affordable Care Act relating to tracking and determining insurance eligibility will find tracking and reporting 1095s in EERP much easier to understand.

For those districts that have not used EERP for ACA reporting in the prior year, the "Affordable Care Act- EERP Implementation Guide" is available by contacting the KDE EERP team via email (EERP@education.ky.gov).

More information on ACA and other year-end processing can be found on the <u>Year End Tax</u> <u>Processing page</u> found on Tyler Community. You must be a member of the Human Resources & Payroll group on Tyler Community to access the prior link. If you are not, you can request access by selecting the appropriate link on the Tyler Community website.

Please note this information presented is intended for general guidance. Legal counsel should be consulted to ensure compliance with all aspects of the ACA.

ACA Command Center

The ACA Command Center is a program that tracks all possible steps to process ACA records and 1094/1095 processes. It's a central place to organize the steps required by your organization and tracks when the steps are completed. You can find the ACA Command Center by going to:

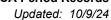
Human resources/Payroll > Payroll > 1095-B/C Processing > ACA Command Center

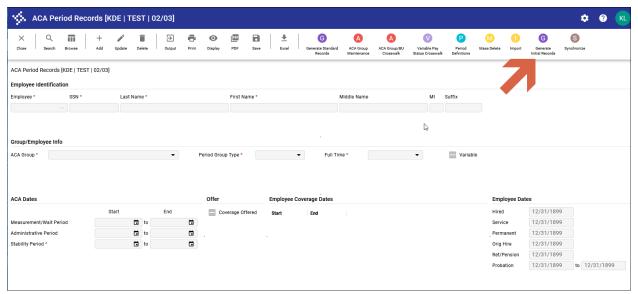
☐ Step #1 - Mass Generate Initial ACA Period Records

Initial ACA Period Records can automatically be created at the time the new employee's Employee Master Record is entered in EERP. For those districts who are just implementing ACA tracking in EERP this year, a function is available to mass-add Initial Period Records. It is also suggested to generate a report to ensure all new hires have Initial Period Records.

If you currently do not have Initial Records for your new hires who started during the 2024 reporting year, you will want to run Generate Initial Period Records. The following menu path can be used, or you can access 'Generate Initial Period' from the ACA Command Center.

Human Resources/Payroll > Payroll > 1095-B/C Processing> Affordable Care Act Setup > ACA Period Records





After selecting **Generate Initial Records** from the menu, the following screen appears. Selecting "Define" will allow the definition of the criteria to be used to generate records.



- Important! Select the appropriate Date Type utilized by your district (Hire Date, Original Hire Date, First Day of Service, etc.) so that records are only generated for employees who were newly hired during 2024 or after the standard definition measurement period that begins on October 3, 2023.
 - If any Initial Period records are created for employees who were employed before 10/3/2023 (standard measurement begin date), it may cause incorrect codes to be populated on the employee 1095-C form during the generation process. This could happen depending on what Date Type is utilized in the Period Definitions setup or the Date Type selected during the period record generate process. The Initial Period Record may need to be deleted as the employee will have a Standard Period Record that will be created in the next step.
- Enter the Start Date and End Date (10/4/2023 to 12/31/2024)

For 1095 reporting, each new employee hired in 2024 should have an Initial Period record. The date of 10/4/2023 is used to capture all employees hired after the standard measurement period for this reporting period began.

The Date Type: Hire Date is used as an example only. Select the appropriate Date Type utilized by your district (Hire Date, Original Hire Date, First Day of Service, etc.).

The "Include Inactive Employees" box is marked so that a record is created for Full-Time employees who were hired in 2024 but are no longer with the district. This is required because generally, an ALE member must file Form 1095-C for each employee who was a full-time employee of the ALE for any month of the calendar year, including those employees who are now inactive.

Generate Initial Records Field	Generate Initial Records Description								
Date Type	This determines which employees to generate Initial records for by checking the specified date against the Start and End dates specified. They relate to dates on the "Dates" tab in the Employee Master.								
Start and End Date	An Initial Period record will be added for any employee whose date falls within this date range.								

After completing the definition criteria and selecting "**Execute**", if there are any period records to be created the system will perform a proof/post-process. First, it will produce a listing of the records to be generated (an example of a report from 2017):

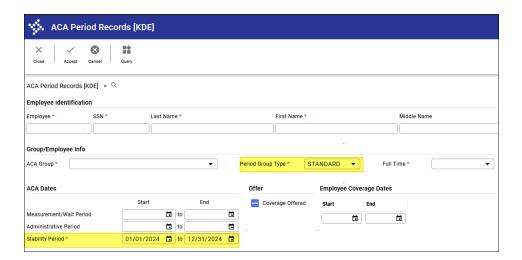
ACA INITIAL GENERATE REPORT									
EMP # EMP NAME	EMP SSN		GRP TYPE VAR	FT	MEASURE/WAIT START END	ADMINIS START	STRATIVE END	STABI START	LITY END
Location: 001 8881 SNOW, JON	123-99-9992	ALL	INIT N	Υ	MM/DD/YY MM/DD/YY	01/03/24	02/29/24	03/01/24	02/28/25
Location: 010 1305 STARK, SANSA 8882 STARK, NED	123-11-9999 123-99-9993			U Y	02/01/24 01/31/25 MM/DD/YY MM/DD/YY	02/01/25 08/01/24	02/28/25 09/30/24	03/01/25 10/01/24	02/28/26 09/30/25

The program will then ask if you wish to post those records. If "Yes" is selected, the proofed records will be added to the system.

☐ Step #2 - ACA Standard Period Records - 2024

This process should be completed near the end of each standard measurement period (October) to create new measurement period records for the next cycle. Standard Records for 2024 reporting should already have been created. If this step has been completed, the step may be skipped.

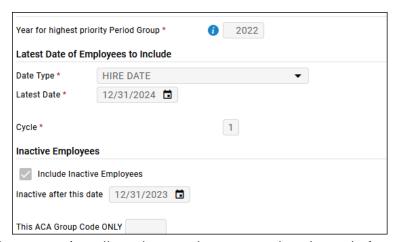
If you are not sure if Standard records were generated, select **Search** and search for Period Group Type "Standard" and Stability Period (01/01/2024 to 12/31/2024).



- If **NO** Standard records are found for 2024, ACA Period Records must be created. *If records* exist, you can skip to the next section of the guide.
- Select Generate Standard Records to create a set of Standard Period Records with 2024 stability dates.
- Year for highest priority Period Group: Enter 2022 as the Year for the highest priority group as the tracking period began in October 2022 through October 2023.
- **Date Type**: Enter the Date Type used by your district; in this example, we used the Hire Date.
- Latest Date: 12/31/2024. The Date Type and Latest Date field will function as a limiter on which employees have Standard Period ACA records created.
- Cycle: Enter "1"
- Include Inactive Employees: Mark "Include Inactive Employees" to create records for those employees who are now inactive, however, were employed and were either offered or had insurance during the 2024 calendar year.
- Inactive after this date: Enter 12/31/2023. Employees inactive after 12/31/2023 will not have a period record created since they are not required to be reported in 2024.
- ACA Group Code: Leave the ACA Group Code blank to generate for all employees.
- Select Execute.

Payroll – ACA Period Records

Updated: 10/9/24

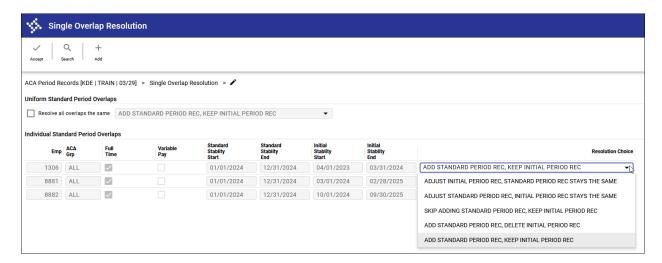


After generating, all employees who were employed on or before the start of the measurement period (October 2022) should have a Standard Measurement Period record with the information below:

Measurement/Wait: Start: 10/3/2022 End: 10/2/2023
 Administrative: Start: 10/3/2023 End 12/31/2023
 Stability: Start: 1/1/2024 End 12/31/2024

Selecting **Yes** creates the period records indicated in the proof. After records are generated, users can view and edit them in the ACA Period Records program.

If the generate process is unable to create an ACA Period Record for an employee due to overlapping dates, a prompt will be provided. Because an employee can have initial and standard tracking and stability dates that may fall over a portion of the same dates, it is suggested to "Add Standard Period Record, Keep Initial Period Rec". However, this could vary by situation and how your district chooses to manage data. Each employee listed should be reviewed to determine what option to select.



Understanding the ACA requirement for tracking initial and standard periods will better equip users to determine what option should be selected. This will vary by district and employee record.

☐ Step #3 - Mark "Coverage Offered" on Standard Period Records

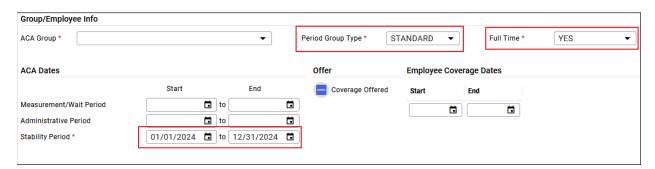
An offer of coverage to full-time employees must be reported on 1095-C's. To report on the offer of coverage, all FT employees (*assuming coverage was offered*) need to have the Coverage Offer flag marked on the ACA period record. While there is an option to "set coverage offered" when importing the Participant file in step #7, that process will not mark the coverage offered flag for full-time employees who decline health insurance, therefore **this step is required.**

1. Select Search and find on:

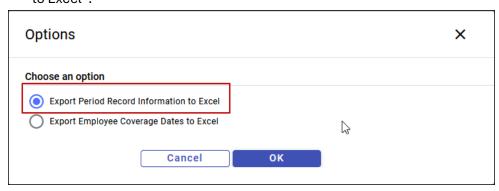
a. Period Group Type: Standard

b. Full Time: Yes

c. Stability Period: 01/01/2024 to 12/31/2024



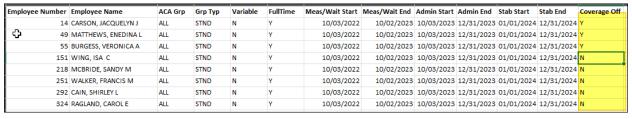
2. Select the **Excel** button on the menu bar and then select "Export Period Record Information to Excel".



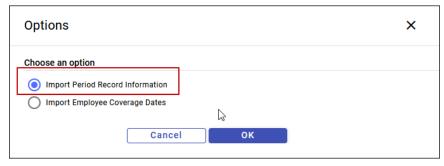
Unselect the SSN field as it is not needed to export and import into EERP if the Employee Number is available. Select **Accept** to download the Excel file to your computer.



- 4. Open the Excel file on your computer. Save the file locally to your computer as changes need to be made and uploaded to EERP.
- 5. Update the Coverage Offered cells to "Y". However, if an employee on the Excel spreadsheet was not offered insurance, the Coverage Offered field should remain "N".



- 6. Save and close the Excel file.
- 7. In EERP, select **Import** from the menu and then select "**Import Period Record Information**".



8. Select **Define** and select the import file by navigating to the file on your computer and then **Accept**. Note that after selecting the file, the import file name will automatically change to a temporary file name used by the system to upload the file. No action to change the file name is required.

Payroll - ACA Period Records

Updated: 10/9/24

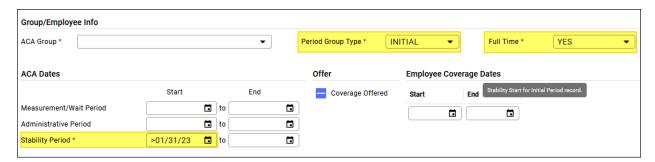


- 9. Select **Import** from the menu. Review the report and if correct, select **Yes** to post.
- 10. Select Back and review the employee's ACA Period Record to ensure the "Coverage Offered" flag was marked. Any FT employee who did not receive an offer of coverage should have the flag removed from their record.
- 11. To protect employees' Personally Identifiable Information (PII), the Excel file should be deleted from your computer and the Recycle Bin emptied.

☐ Step #4 - Import "Coverage Offered" for Initial Period Records

Initial period records are created based on the date a new employee is hired. Because the hire date varies for new employees, the Admin and Stability date ranges on the ACA period record will vary. ACA period records that have a stability period that falls anywhere within the calendar year 2022+ may need to be modified to indicate coverage was offered to full-time employees.

- 1. Select **Search** and find on:
 - a. Period Group Type: Initial
 - b. Full Time: Yes
 - c. Stability Period: >01/31/2023 to blank.
 - i. This will return all Initial and FT employee records where the stability period falls during any month during the 2023 calendar year but also crosses calendar years. (Employees hired in February of 2023 forward will have an initial period record that crosses into the calendar year 2024.) Note that there will likely be some employees exported that already have the Coverage Offered flag marked (Yes) from the prior year. The Coverage Offered Flag should remain as Y for Yes.



2. Mark these records as "Coverage Offered" by repeating the steps listed in the prior section of this document starting at step #2. Alternatively, you may choose to individually update the "Coverage Offered" flag on each record assuming these FT employees were offered coverage.

☐ Step #5 - Adjust ACA Period Records as Needed

Administrative and Stability Dates on the ACA Period Record determine which codes are generated on the employee's 1095-C record. Adjustments may be made to either the period record so that the correct codes are generated on the 1095 form or the individual 1095s may be manually corrected. Below are a few common scenarios. Note that there may be different variables per district and employee.

Users may also elect to manually fix or change the employee's 1095-C after the forms are generated.

Scenario #1: PT/Substitute that becomes a Full-Time Employee

An employee who was employed in a position other than Full Time (substitute or PT), switched to Full Time during the calendar year, and therefore was offered insurance may require two period records (one as variable and one as FT). The employee would already have a Standard Period record for the non-FT position and an additional Standard Period record is required for the FT position.

This scenario assumes the Hire date from the substitute position in EERP remains on the Employee Master and was not updated to reflect the new position. EERP offers flexibility in what employment dates are used for the ACA Period Definitions and the 1095-C Generate process. Because of this and how your district manages employment dates on the Employee Master, your results may differ. Users can change the codes manually on the 1095-C forms in EERP to ensure correct reporting to the IRS.

As seen in the examples below, a longtime employee who was a variable hour employee (Substitute) needs an ACA Period Record with the following items set:

Payroll - ACA Period Records

Updated: 10/9/24

Period Group Type: Standard Record

Full Time: Undetermined

Variable Marked

This indicates the employee was hired before 1/1/2020 but was not eligible for insurance and no offer of coverage is marked.

ACA Period Record - Substitute Position



The employee switched to a Full-Time position on 8/25/2024. An Initial Period Record may be entered (if it doesn't already exist) to show the status change and health insurance coverage (example follows). Remember, the Administrative and Stability Dates drive what codes the IRS requires on the 1095-C forms.

As seen in the example, once a variable status employee becomes a full-time employee an additional ACA Period Record may be required with the following items set:

- Period Group Type: Initial
- Full Time: Yes
- Coverage Offered Flag Set
- Administrative Period Dates entered
- Stability Period Dates entered

ACA Period Record - Full-Time Position



After the 1095 record is generated, the proper codes are reported. Manual changes may be made to the 1095 record for proper reporting if needed.

Employee 1095-C

Employee Offer	Covered Indiv	viduals	Addre	ss	Indicates no offer of coverage on line 14 and not full Admin Waiting time on line 16 Period - Code 2D on line 16													Employee offered coverage and enrolled in coverage							
		All 12	Γ	Jan		Feb		Mar	Apr	C	May	٠,	Jun	Jul	ly	Aug		Sep		Oct		Nov	De	ес	
Offer of Coverage			-	1H	•	1H	•	1H ▼	1H	-	1H ·	•	1H ▼	1	н 🕶	1H	· ·	1H	•	1/	→	1A •	•	1A	-
Employee Required Contribution	on																		1						
Safe Harbor			-	2B	•	2B	•	2B ▼	2B	•	2B ·	•	2B ▼	2	!B ▼	20	· ·	2D	-	20	- ▼	2C •	. [2C	•

Jan–July: 1H & 2B

Aug-Sep (Admin Period): 1H & 2D

Oct-Dec (Coverage): 1A & 2C

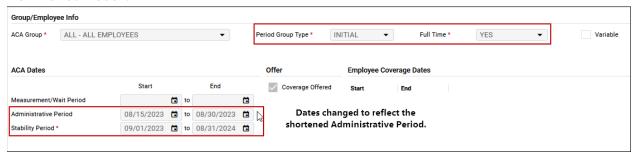
- Note: Records are produced based on several settings in each district's EERP system and results may differ. Because districts manage employee hire and end dates on the employee master differently, results may vary. The 1095 codes are based on, at the minimum, the following items:
 - Period Record Type: Initial or Standard
 - Dates on the ACA Period record:
 - o Measurement Period
 - o Administrative Period
 - Stability Period
 - Employment Dates Start and End Indicator used in the 1095-C generate process.
 - Dates listed on the Employee Master record

Scenario #2: Full-Time Employee that transfers into your school district

Employees who transfer into your district who already have health insurance are not treated the same as new full-time employees during the Administration Period. A new employee typically has a waiting period before insurance starts; however, a transfer may already have coverage, and it is just a matter of when the employee is transferred to your district's health insurance bill. Because the Admin and Stability date ranges vary from a traditional new employee, the ACA period record that was automatically created will need the Administration Period (if applicable) and Stability Period modified to reflect individual transfer employee circumstances.

For example, if an employee transfers into the receiving district there may not be a waiting period. Example: Employee A was hired on 8/15/2023 (when the contract was given), and the insurance with the sending district went through the end of August, then picked up at the receiving district on 8/15/2023 with no lapse in coverage with insurance starting on 9/1/2023 with the receiving district. This would have to be manually addressed either on the period record reflecting a shorter admin period or on the 1095 record. The 1095-C would reflect a one-month waiting period, then 1A and 2C beginning in September instead of October. Again, this is only an example, and each situation may be different and vary by the employee.

ACA Period Record



Employee 1095-C



• Jan – July: 1H & 2A

August (Admin Period): 1H & 2D
Sep-Dec (Coverage): 1A & 2C

☐ Step #6 - Import Health Insurance Dependents

The KY Department of Employee Insurance (DEI) provides dependent and participant/employee information to assist Kentucky school districts with ACA reporting. DEI will create a file of dependent coverage dates with delivery to districts in January. Once the file is available, an email will be distributed notifying districts about the file availability. Each district will receive an import file that is saved to the spool directory. The file is named 20xxACADep##-000#.txt where xx is the reporting year, ### is the district's KHRIS number, and # is the file iteration. Please refer to the communication from the KDE Enterprise ERP Team with more information on the file names that should be downloaded.

Download the ACA Dependent file to your computer using the **File Transfer** or **Transfer a File** program. You can find these programs by going to:

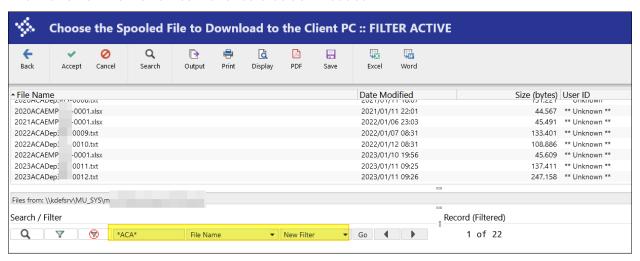
- ASP Admin > Transfer a File
- System Administrator > Miscellaneous Administrator > File Transfer

If you do not have access to either program or are unable to locate the file in your spool directory, please contact your EERP system administrator (typically the Finance Officer) as your EERP System Role information, Spool file maintenance may be set to Personal or Departmental access only.

Select Download from the spool directory.



Find the appropriate year's files using the search or filter option located at the bottom of the screen (search for *ACA*). Please refer to the communication from KDE Enterprise ERP Team with information on the file names that should be downloaded.



Double-click on the file or select Accept and save it to your computer. Continue with the instructions that follow to import the file.

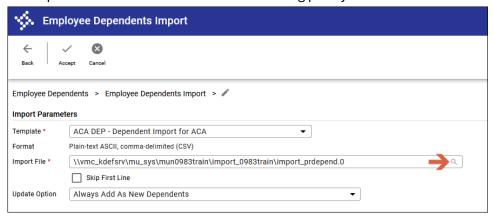
Employee Dependent Import

More information can be found via a document found via Tyler Search and entering 'Employee Dependents and Employee Beneficiaries Import'.

- Human Resources/Payroll ► Human Resources ► Benefits Administration ► Employee Dependents
- 1. Select Import from the menu.
- 2. Select Define.
- 3. Temple: select ACA DEP- Dependent Import for ACA from the drop-down box.
- 4. On the **Import File,** select the downloaded file by selecting the file picker and navigating to the file on your computer. Note that after selecting the file, the import file name will

automatically change to a temporary file name used by the system to upload the file. No action to change the file name is required.

5. For the **Update Option**, either option will work. If you select "Always Add As New Dependents" it will add new records leaving prior year records intact.



- 6. Select **Accept** and then select your report output option to review the report. If there are errors listed in the report, please see the next section.
- 7. After reviewing the report select **Yes** to import the dependent records.



8. To protect employees' Personally Identifiable Information (PII), the downloaded file should be deleted from your computer and the Recycle Bin emptied.

Import Errors

During the import process, the proof report may display error messages.

1. In this example, the following error report states that the import file includes an employee SSN not found in EERP. Either EERP or KHRIS has the wrong SSN on file. Users can open the download file and review the names of the dependent for more information.

Users will need to research to determine the valid employee SSN and add the dependent manually.

In this example, lines 1, 2, and 3 are referenced in the error report below. Using a text editor (Notepad) or Excel, users can find the invalid SSN by reviewing the line number in the file.

Error report:

Payroll - ACA Period Records

Updated: 10/9/24

```
RECORDS ANTICIPATED TO FAIL:

LINE ERROR MESSAGE

1 Invalid Employee SSN: No matching Employee
1 No valid SSN or Employee Number provided
2 Invalid Employee SSN: No matching Employee
2 No valid SSN or Employee Number provided
3 Invalid Employee SSN: No matching Employee
3 No valid SSN or Employee Number provided
4 No valid SSN or Employee Number provided
```

An example of a file supplied by DEI is seen below using Notepad++. Notepad++ will display the line number referenced in the error report making it easier to identify any errors. You can also open the file in Excel to view the line/row of data.

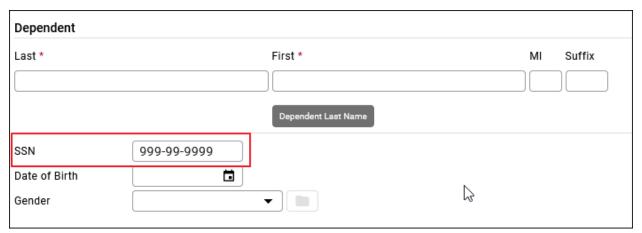
The file is laid out in the following format:

Employee SSN, Dependent Last Name, Dependent First Name, Dependent SSN, Dependent DOB, Coverage Start Date, Coverage End Date

- You can manually Add the dependent record to the Employee Dependent program once
 you determine the employee to which the dependent belongs. Do not import the file again
 unless you have reviewed all records and updated any record that contains SSN 99999-9999 (next step).
- 3. To protect employees' Personally Identifiable Information (PII), the downloaded file should be deleted from your computer and the Recycle Bin emptied.

Review Dependent Records - CRUCIAL!

1. Select **Search** and find any dependent with an SSN of 999-99-9999 by entering 999-99-9999 in the Dependent SSN field.



- 2. The IRS requires that all dependents have a valid SSN reported and if not available the Date of Birth should be supplied in its place. Print a report showing all the dependents with a 999-99-9999 social security number.
 - The IRS requires that an effort be made by the employer to contact the employee to request the SSN. The SSN should be updated in the KHRIS system and within the Employee Dependent record in EERP.
- 3. Update all records that have a 999-99-9999 SSN with either a valid SSN or delete 999-99-999 from the Dependent SSN field and save.

☐ Step #7 - Importing Participant (Employee) Coverage Dates

The KY Dept. of Employee Insurance (DEI) provides dependent and employee/participant information to assist Kentucky school districts with ACA reporting. DEI will create a file of employee coverage dates for delivery to districts in January. Once the file is available, an email will be distributed notifying districts about the file availability.

Before importing the coverage dates for employees, double-check that both Standard and Initial Period records have been generated.

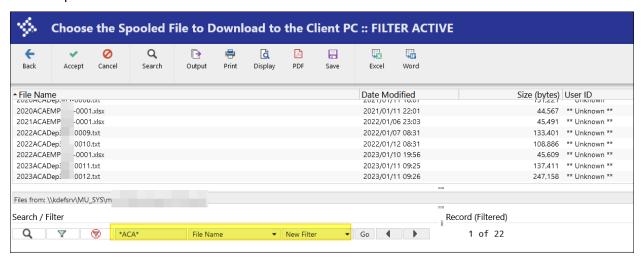
Download the Participant/Employee file to your computer using the **File Transfer** or **Transfer a File** program. You can find these programs by going to:

- ASP Admin > Transfer a File
- System Administrator > Miscellaneous Administrator > File Transfer

If you do not have access to either program or are unable to locate the file in your spool directory, please contact your EERP system administrator (typically the Finance Officer) as your EERP System Role information, Spool file maintenance may be set to Personal or Departmental access only.

The participant file is named **20XXACAEMP###-000#.txt** where xx is the reporting year, ### is the district's KHRIS number, and # is the file iteration using the filter option located at the bottom of the screen. Please refer to the communication from KDE Enterprise ERP Team with information on the file names that should be downloaded.

An example:



Double-click on the file or select Accept and save the file to your computer. The downloaded file is in an Excel format (xlsx) and must be in this format to import into EERP.

- 1. In the ACA Period Records program, from the menu select the Import button.
- 2. Select the radio button for "Import Employee Coverage Dates".



3. Click the Define button. Click the File Finder icon on the far right of the box to locate the file on your workstation.

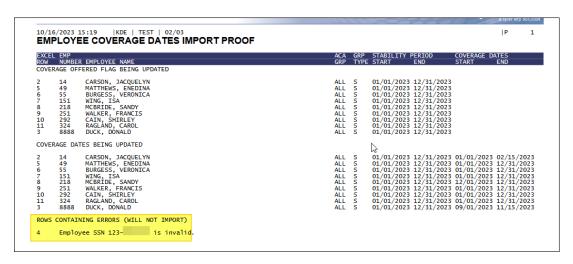


- 4. Locate and select the 20XXACAEMP###-000#.xlsx file (where xx is the reporting year, ### is the district's KHRIS number, and # is the file iteration). Please refer to the communication from the KDE Enterprise ERP team on the file names that should be downloaded.
- 5. After selecting the file, the import file name will automatically change to a temporary file name used by the system to upload the file. No action to change the file name is required.

- 6. Optional: Mark "Set coverage offered". All full-time employees should have had this marked in Step #4, but it is suggested to mark the flag.
- 7. Click the Import button and you are prompted to print/display the posting report. Please review this report as it contains both records to import and errors records that cannot be imported. Although the file may be imported with the errors left off, KDE suggests resolving any issues before clicking Yes to post the import.
- 8. To protect employees' personal information (Personally Identifiable Information (PII), the downloaded file should be deleted from your computer and the Recycle Bin emptied once all errors have been resolved.

Import Errors

Any import errors will display at the end of the report stating which line of the Excel file did not import.



Employees who started and stopped coverage more than once during the year will have multiple coverage date records imported.

☐ Step #8 - Generate 1095s

Once all the proceeding steps have been completed users can begin generating 1095s forms. A separate guide is available titled *ACA- 1095 Generate (2024 Reporting)* to assist with that process.

You must import dependent and employee health insurance coverage into EERP (steps 6 and 7) before proceeding with the creation of the 1095s.

☐ Step #9 - Generate Period Records for Future Years

Generate Standard Records for 2025

In the **ACA Period Records** program, select **Generate Standard Records** to create a set of Standard Period Records with 2025 stability dates (if not already done so).

- Create standard records for the calendar year 2025. **Tracking for 2025 insurance started** in October 2023. It is important to run the process as close to the October 3rd measurement start date as possible.
- Enter 2023 in the "Year for highest priority Period Group".
- Enter the Date Type used by your district, in this example, we used Hire Date.
- Latest Date: 10/3/2023
- Enter "1" for Cycle
- Do <u>NOT</u> Mark "Include Inactive Employees".
- Leave the ACA Group Code blank to generate for all employees.

Once the generate process is completed, all employees who were employed on or before the start of the measurement period should have a Standard Measurement Period record with the information below.

Measurement/Wait: Start: 10/3/2023 End: 10/2/2024
 Administrative: Start: 10/3/2024 End: 12/31/2024
 Stability: Start: 1/1/2025 End: 12/31/2025

Generate Standard Records for 2026

In the **ACA Period Records** program, select **Generate Standard Records** to create a set of Standard Period Records with 2026 stability dates (if not already done so).

- Create standard records for the calendar year 2026. Tracking for 2026 insurance started in October 2024. It is important to run the process as close to the October 3rd measurement start date as possible.
- Enter 2024 in the "Year for highest priority Period Group"
- Enter the Date Type used by your district, in this example, we used Hire Date.
- Latest Date: 10/3/2024
- Enter "1" for Cycle
- Do **NOT** Mark "Include Inactive Employees".
- Leave ACA Group Code blank to generate for all employees

Once the generate process is completed, all employees who were employed on or before the start of the measurement period should have a Standard Measurement Period record with the below information.

EERP Guide

Payroll – ACA Period Records

Updated: 10/9/24

Measurement/Wait: Start: 10/3/2024 End: 10/2/2025
 Administrative: Start: 10/3/2025 End: 12/31/2025
 Stability: Start: 1/1/2026 End: 12/31/2026