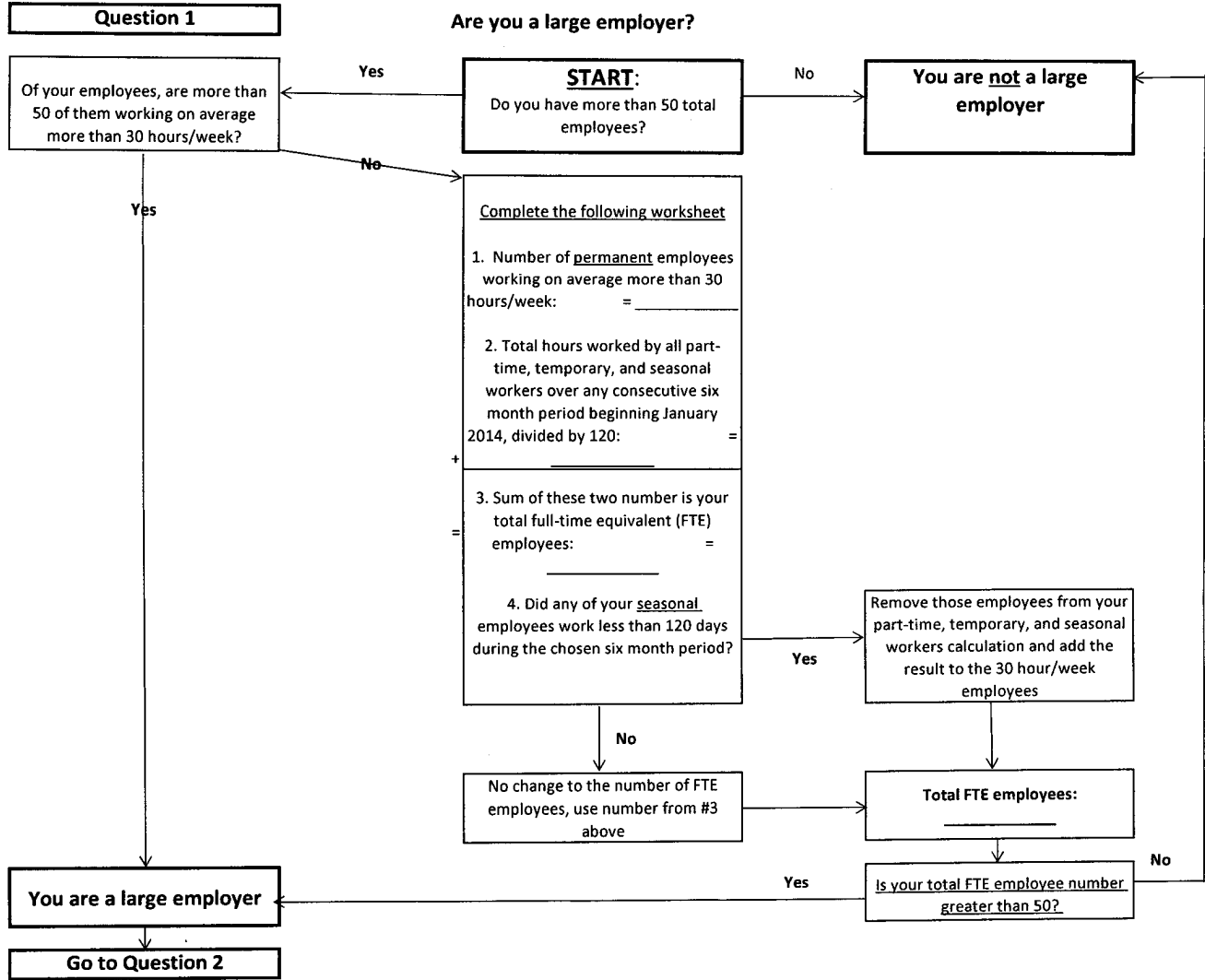


Employer Shared Responsibility Transition Relief



Question 2

As a large employer, when do I have to comply with the employer shared responsibility mandate?

1. More than 50, less than 100 FTE: You must provide minimum value, affordable coverage to all employees working an average of 30 hours/week by January 1, 2015, **UNLESS** you qualify for the transition relief described below.

2. You must meet the following requirements to qualify for the transition relief.

2A. During the period beginning February 9, 2014 and ending on the last day of the 2014 plan year, you may not reduce the size of your workforce or the overall hours of your employees just to qualify for the transition relief; **AND**

2B. During the period beginning February 9, 2014 and ending on the last day of the 2014 plan year, you may not eliminate or materially reduce the health coverage which you offered on February 9, 2014.

START:
As a large employer, do you have more than 50 FTE employees, but less than 100 FTE employees?

1. More than 100 FTE: You must provide minimum value, affordable coverage to all employees working an average of 30 hours/week by January 1, 2015, **UNLESS** you qualify for the transition relief described below.

2. Answer the following questions to determine if you qualify for the 2015 non-calendar year transition relief.

2A. Did you maintain a non-calendar year plan as of December 27, 2012?

2B. Have you modified the plan year since December 27, 2012?

You must provide minimum value affordable coverage to all full-time employees by January 1, 2015

Caveat: You will not be considered to have violated this requirement if:

(i) you continue to offer the same employer contribution toward the cost of employee-only coverage that is (A) at least 95% of the dollar amount offered on February 9, 2014, OR (B) at least the same % of the cost of coverage that you were offering on February 9, 2014; **AND**

(ii) you do not narrow or reduce the class or classes of employees to whom coverage was offered on February 9, 2014

If you can satisfy these requirements, you will not have to comply with the employer shared responsibility mandate until the beginning of the plan year in 2016

If you cannot satisfy these requirements, You must provide minimum value, affordable coverage to all full-time employees by January 1, 2015

Caveat: Full-time employee for this purpose means any employee working on average 30 hours or more per week.

2C. Can you say yes to at least one of the following questions?

a. At least 1/4 of all your employees were **covered** under your plan as of any date in the 12 months ending on February 9, 2014?

b. You offered **coverage** to 1/3 or more of all your employees during your plan's June 2013 open enrollment?

c. At least 1/3 of your **full-time** employees were **covered** under your plan as of any date in the 12 months ending on February 9, 2014?

d. You offered **coverage** to 1/2 or more of your **full-time** employees during your plan's June 2013 open enrollment?

Caveat: Covered and coverage for this purpose includes coverage under Plans 7 & 8 of the WLRA Plan.

Question 3

If I am a large employer, and I qualify for transition relief, what **type** of coverage do I have to provide to **which employees** before my transition relief expires?

You do not have to comply with the employer shared responsibility mandate until the beginning of the plan year in 2015

Type of Coverage:	Coverage must be minimum essential coverage, which would include the preventive plan offered under the WLRA Health Benefit Plan.	Eligibility:	If eligibility for your plan is based on hours worked, you can use up to 40 hours per week as the standard for eligibility.
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