



## Policy on Dual Employment Restrictions

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### Applicable Employees:

Any employee who currently does not receive state sponsored health insurance benefits and is not considered a full-time employee. Such employees are University Assistants, Adjunct Faculty, Graduate Assistants, & Student Employees.

**Policy Effective Date:** January 6, 2017

### Overview:

Beginning in 2015, in accordance with the Affordable Care Act (ACA) of 2010, businesses that employed more than 100 full-time employees were required to offer the health care coverage mandated by the government for 70 percent of its workers or they would be required to pay a financial penalty for each employee not covered. In 2016, these businesses were required to cover 95 percent of its employees. Since the University employs more than 100 full-time employees, we are required to provide such coverage, or pay the penalty.

### Provisions:

Per the ACA, a full-time employee is defined as any individual who is **paid an average of 30 hours per week** (130 hours per month) during the previous 12-month (calendar year) period. Below is a listing of non full-time positions that the University has which all work less than 30 hours per week:

- **University Assistant** – Limited to an average of 19 hours per week per a Board of Regents resolution.
- **Adjunct Faculty** – Limited to a maximum of 8.00 load credits per semester in accordance with the AAUP collective bargaining agreement. Each load credit is calculated as 2.25 work hours per week per the ACA. Thus, if an individual is carrying 8.00 load credits multiplied by 2.25 hours per week ( $8.00 * 2.25$ ) they are considered to be working 18 hours per week.
- **Graduate Assistant** – Limited to a total of 20 hours per week.
- **Student Employee** – Limited to 20 hours per week during the academic year and 40 hours per week during the Winter Intersession and Summer sessions. Per a Board of Regents resolution, they are not permitted to work on any other payroll at the same time when they are employed as a Student Employee.



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Based on the above definitions, none of these employee designations work 30 hours per week, or more, thus there are no implications from the employer mandate section of the ACA. However, if an individual works more than one of these employee designations at the same time, there could in fact be implications. An example of this would be an individual who teaches 8.00 load credits during a semester as an adjunct faculty member, while also working 19 hours per week as a University Assistant. Based on the above definitions, they would be working a total of 37 hours per week (i.e.: 18 hours in their adjunct faculty position and 19 hours per week in their University Assistant position). Based on this, the University would either need to provide this individual with state sponsored health insurance benefits or pay a financial penalty.

Since these part-time positions were not established with the intention of providing an individual with certain full-time employee benefits (i.e.: state sponsored health insurance), effective at the beginning of the Spring 2017 semester (January 6, 2017), individuals will no longer be permitted to be employed in more than one part-time position, including all State of Connecticut agencies, at the same time when the hours worked in a week total 30 hours or more. However, individuals will still be permitted to work in more than one employment category, as long as the total hours worked between the positions does not total more than 29 hours per week. An example of this would be if an individual teaches 3.00 load credits as an adjunct faculty member during a semester while also working 19 hours per week as a University Assistant. In this situation the individual would work a total of 6.75 hours per week (3.00 load credits \* 2.25 hours) in their adjunct faculty position in addition to the 19 hours per week in their University Assistant position, for a total of 25.75 hours per week.

If you have any questions regarding this policy please contact, Fred Cratty, Chief Human Resources Officer, at 203-837-8665 or via email at [crattyf@wcsu.edu](mailto:crattyf@wcsu.edu).