

# ACA Offboarding Compliance Checklist



Affordable Care Act

## For Applicable Large Employers

Use this checklist each time a full-time employee separates to reduce ACA reporting errors and employer mandate exposure.

### 1. Confirm Official Termination Date

- Document the official termination date in writing
- Ensure payroll and HRIS systems reflect the same date
- Confirm termination date aligns with benefits eligibility records
- Retain documentation for audit defense

### 2. Verify Coverage End Date

- Confirm plan design rule (last day worked or end of month)
- Apply correct coverage termination date
- Ensure benefits platform reflects accurate final coverage month
- Validate final month of coverage for 1095-C reporting

### 3. Review Affordability and Offer Status

- Confirm offer status was correct for each month of employment
- Validate affordability safe harbor applied correctly
- Review final month coding for reporting accuracy

### 4. Issue COBRA Notices (If Applicable)

- Determine COBRA eligibility
- Issue notice within required timeframe
- Document date of notice delivery
- Record election or non-election status

### 5. Assess Variable Hour / Stability Period Impact

- Confirm measurement period classification
- Determine if stability period coverage obligations remain
- Avoid premature coverage termination if stability period applies

### 6. Reconcile All Systems

- Payroll updated
- HRIS updated
- Benefits administration platform updated
- ACA reporting tool updated
- Monthly eligibility history verified

### 7. Preserve Documentation

- Termination confirmation retained
- Coverage end confirmation retained
- COBRA documentation stored
- Affordability calculations archived

### Final Review

- All systems aligned
- Reporting codes verified
- Documentation complete
- Compliance exposure minimized

Retention should align with ACA recordkeeping best practices.