

Questions	Answers
<p>Q: If a College or University normally pays 100% of the cost of Student Health Insurance, can the school apply that amount to employer sponsored coverage instead?</p>	<p>A: Fulltime student workers attending Colleges or Universities that pay for 100% of the cost of Student Health Insurance and offer employer sponsored coverage to fulltime student workers who are not part of work study programs will have a choice between the Student Health Insurance and the employer sponsored coverage. If the school chooses to apply the amount it would have paid for Student Health Insurance to the cost of employer sponsored coverage, that may be sufficient to avoid a penalty for the coverage provided to the student worker. Employer sponsored coverage is then affordable and has minimum value. However, schools should be careful not to create a discrimination issue under applicable Internal Revenue provisions by paying a lower contribution for student workers than for highly compensated employees.</p>

Q: Could graduate students and graduate teaching assistants be full time employees under PPACA?
 A: Yes. Graduate students and teaching assistants could be full time employees under PPACA if they work an average of 30 or more hours per week. If it is not possible for a College or University to determine if they will work an average of 30 hours per week, they could be considered to be "variable hour" employees, and their employers use a "look

Q: What if a student participates in a workstudy program during the fall and spring academic semesters, but takes a new workstudy position during the summer?

A: A College or University is not required to track the hours of service for a student in a workstudy program to determine if the student is a full-time employee under PPACA. However, any time for which the student is paid for hours of service outside of the workstudy program will count as hours of service and should be tracked toward a determination as to whether the student is a full-time employee. However, because the student works in a workstudy position during the summer, the student may be considered to be a "seasonal employee." Seasonal employees for purposes of PPACA are employees who are employed for less than six months and are customarily hired at the same time each year. Schools are permitted to use a "lookback" method safe harbor to determine if seasonal employees are full