

# PPACA Reporting – Decoding the Mystery to Compliance Newell Rubbermaid's Current Approach

Sharpie.

LENOX

IRWIN.

Paper Mate

Goody.

LEVOLOR

Rubbermaid

PARKER.

GRACO

DYMO

Calphalon

Rubbermaid  
Commercial Products

WATERMAN  
PARIS

Aprica.



# Today's Agenda

## Before We Get Started...

- About Newell Rubbermaid
- Rationale & Methodology

## What Will We Cover?

- Why partnering with your HRIS team will save the day
- How to approach variable hour employees with ease
- When to keep the business informed
- What we learned along the way

# A bit about us...

## Newell Rubbermaid as a company is...

- A Brand and Innovation led company that is famous for design and product performance



## Who we are...

- We are... a consumer goods company and have an entrepreneurial spirit so we like to try and solve for things internally before we search for external solutions
- We are... a large global organization with a lean HR staff supporting both manufacturing and retail business groups
- We are not... a company willing to take risks when it comes to compliance so if we have questions, we reach out to our external legal experts in the field
- We are not... experts in the field and are a small team that continues to learn as we go, we are employees like you.

# Rationale & Methodology

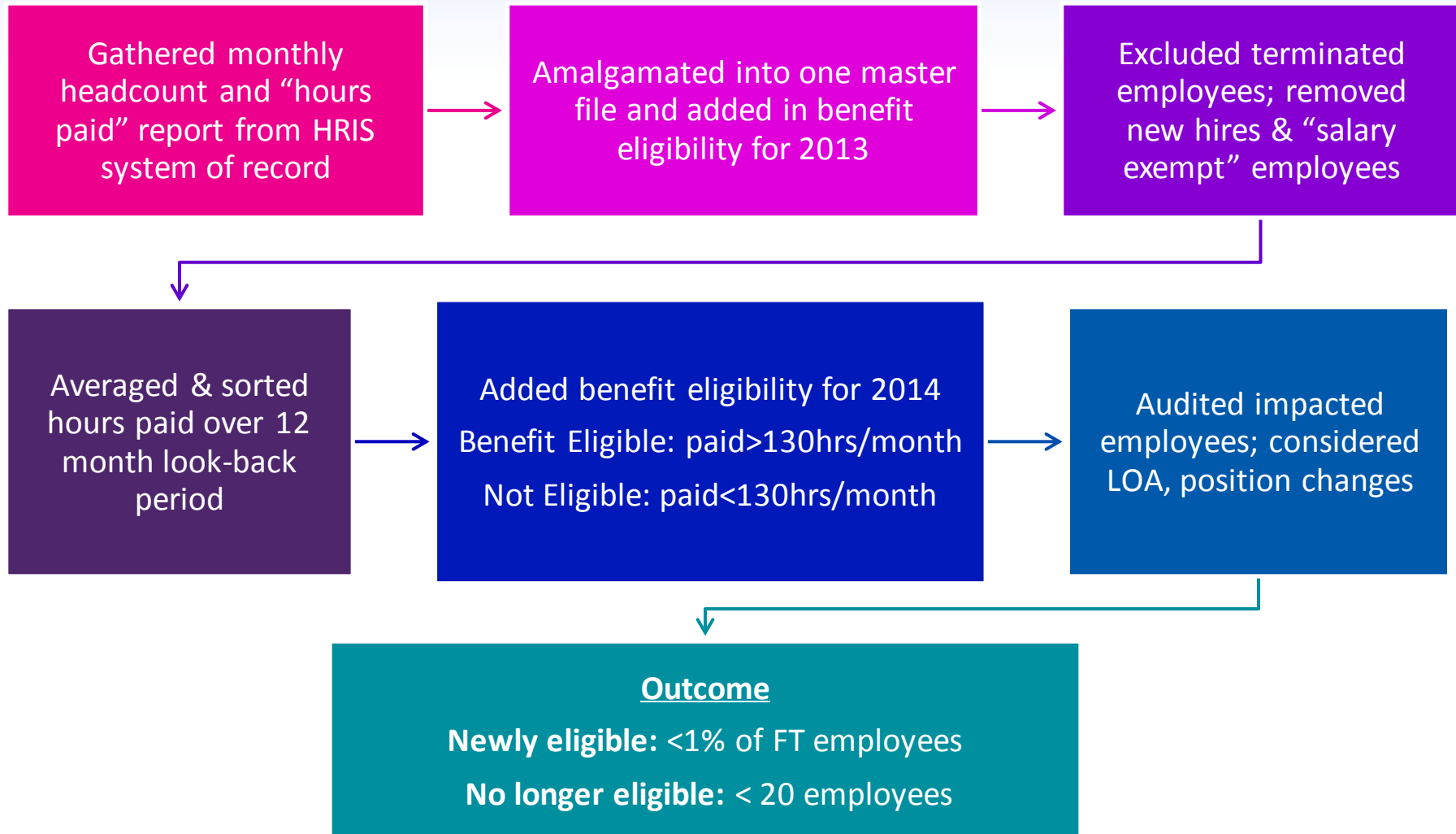
## Why Now?

- When the regulations changed, we decided to use 2014 as a “trial year”
- Ran “mock reporting” to test challenges before they became issues
- Wanted to keep the business engaged through the year
- Opportunity for continued education

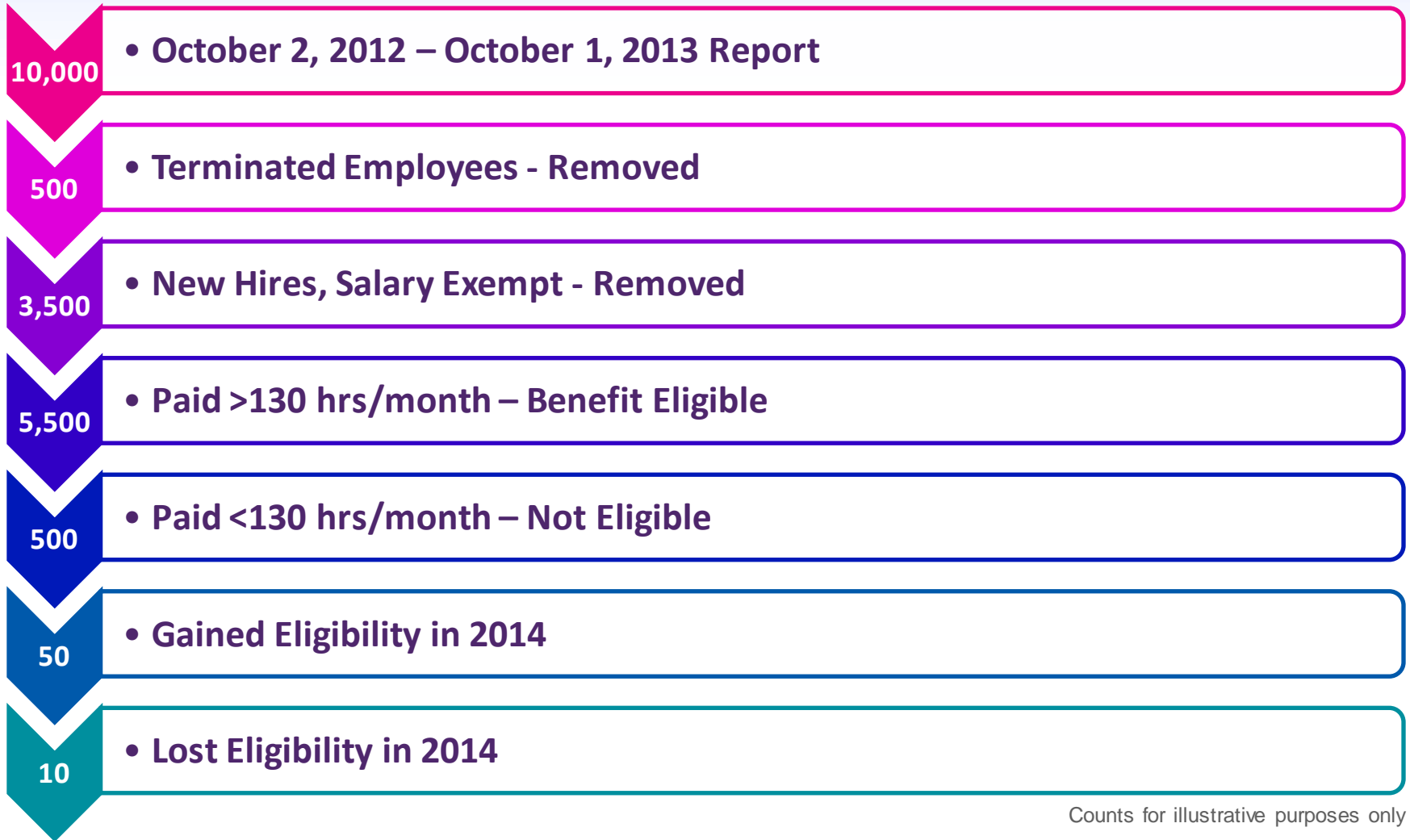
## Methodology

- Newell Rubbermaid’s system of record is SAP
- Our timekeeping system is Workforce
- At NWL, to be eligible for benefits, an employee must be reasonably expected to work an average of 30 hours per week
- Self-insured, calendar year medical plan
- “Large Employer” with 12-month Look-Back Period

# Compliance Process



# 2014 Eligibility Outcomes



Counts for illustrative purposes only

# How did we solve for....

## Newly eligible based on Look-Back?

- Treat as a “New Hire”
  - Chose to offer all benefits, not just medical
- Separate Open Enrollment period (1/1 – 1/31)
  - SAP is date driven
- Create adjustment reason to allow for full benefit offering
- Report for those who were changed
  - Receive a notification for any system changes to this group
  - Ability to track costs of benefits through PPACA

## Employees on Short Term Disability?

- Gave “credit” for 40 hours paid/week
- Rationale: Employees on STD are most likely to need the benefits we offer, no harm in offering benefits to those with less hours paid

# How did we solve for....

## New Hires?

- Track all variable hour new hires based on start date
- Run report out of SAP on a monthly basis to capture new hires
- Look-Back over 12 months and determine avg. hours paid
- If eligible, data provided to HR and HRIS to code employee as “Full –Time”
- Use 90 day Administrative Period to complete enrollment process



# Creating a Business Partnership

## Get to know the business; understand HR challenges & concerns

- Before recommending change, you have to understand the starting point

## Draw a correlation between compliance & business impact

- Every decision, plan, or process has to be aligned with the core business strategy

## Provide solutions to potential areas of risk

- Being a strategic partner shows support for the business, employees and company on a whole

## Keep the business informed

- Frequent communications will help engrain the message, with compliance being the new norm

# Sample Communication Slide to Business

AMBITION	 <h2>GROWTH GAMEPLAN</h2>																		
	<p><b>PURPOSE</b> Newell Rubbermaid helps people flourish every day, where they live, learn, work and play</p>																		
BUSINESS MODEL	<p>◆ NWL is a growing brand-led business with a strong home in the United States and global ambition</p> <p>◆ Our consumer brands win at the point of decision through excellence in performance, design and innovation</p> <p>◆ Our professional brands win the loyalty of the chooser by improving the productivity and performance of the user</p> <p>◆ We collaborate with our supplier and customer partners across the total enterprise in a shared commitment to growth and creating value</p> <p>◆ We deliver competitive returns to our shareholders through consistent, sustainable and profitable growth</p>																		
	<p><b>WHERE TO PLAY</b></p> <p>WIN BIGGER ◆ COMMERCIAL PRODUCTS TOOLS WRITING</p> <p>WIN WHERE WE ARE ◆ HOME SOLUTIONS BABY &amp; PARENTING</p> <p>INCUBATE FOR GROWTH ◆ ENDICIA HEALTHCARE</p>																		
	<p><b>5 WAYS TO WIN</b></p> <table border="1"> <tr> <th>MAKE OUR BRANDS REALLY MATTER</th> <th>BUILD AN EXECUTION POWERHOUSE</th> <th>UNLOCK TRAPPED CAPACITY FOR GROWTH</th> <th>DEVELOP THE TEAM FOR GROWTH</th> <th>EXTEND BEYOND OUR BORDERS</th> </tr> <tr> <td>Sharpen brand strategies on highest impact growth levers</td> <td>Launch new USA customer development organization</td> <td>Deliver European Transformation, Project Renewal savings, and working capital reduction</td> <td>Drive performance culture aligned to business strategy</td> <td>Accelerate Latin America and Asia in Win Bigger categories</td> </tr> <tr> <td>Partner to win with customers and suppliers</td> <td>Develop joint business plans for new channel penetration and broader distribution</td> <td>Simplify everything to release costs for growth</td> <td>Build a more global perspective and talent base</td> <td>Strategic insight program in China</td> </tr> </table>					MAKE OUR BRANDS REALLY MATTER	BUILD AN EXECUTION POWERHOUSE	UNLOCK TRAPPED CAPACITY FOR GROWTH	DEVELOP THE TEAM FOR GROWTH	EXTEND BEYOND OUR BORDERS	Sharpen brand strategies on highest impact growth levers	Launch new USA customer development organization	Deliver European Transformation, Project Renewal savings, and working capital reduction	Drive performance culture aligned to business strategy	Accelerate Latin America and Asia in Win Bigger categories	Partner to win with customers and suppliers	Develop joint business plans for new channel penetration and broader distribution	Simplify everything to release costs for growth	Build a more global perspective and talent base
MAKE OUR BRANDS REALLY MATTER	BUILD AN EXECUTION POWERHOUSE	UNLOCK TRAPPED CAPACITY FOR GROWTH	DEVELOP THE TEAM FOR GROWTH	EXTEND BEYOND OUR BORDERS															
Sharpen brand strategies on highest impact growth levers	Launch new USA customer development organization	Deliver European Transformation, Project Renewal savings, and working capital reduction	Drive performance culture aligned to business strategy	Accelerate Latin America and Asia in Win Bigger categories															
Partner to win with customers and suppliers	Develop joint business plans for new channel penetration and broader distribution	Simplify everything to release costs for growth	Build a more global perspective and talent base	Strategic insight program in China															
<p>◆◆◆ EDGE: EVERY DAY GREAT EXECUTION ◆◆◆</p>																			

New Initiatives

Execution Powerhouse

Acceleration

Stock Price

Management Bonus Payout

Headcount

\$\$\$\$\$\$\$\$



**DANGER!**

# What We've Learned...

## Position Changes

- Once eligible, employee needs to keep eligibility through the Stability Period
- Position or location change does not impact eligibility

## Dependent SSN

- 3 attempts are required and Open Enrollment form can count as an “attempt”
- Can be requested electronically and/or via paper

## Cascading

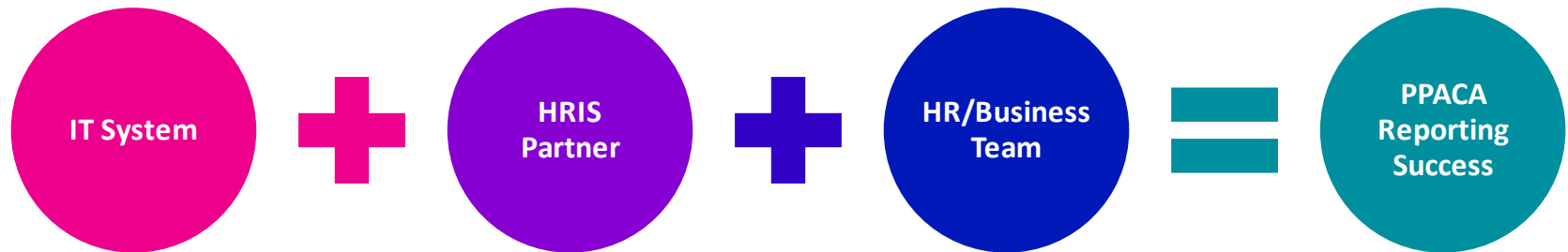
- Do not rely on the business to cascade this to the Line or Retail leaders
- The leaders responsible for the hourly retail and manufacturing workforce need to hear this from HR directly

## Limiting Hours

- You can not limit hours in order to avoid offering medical coverage
- We are able to track PT and FT hours and keep people to their schedules but we can not lower hours just to avoid benefits.

# Key Take-Aways

1. Before getting started it is important to understand what your IT system can and can't do
2. Get to know the business and how they operate
3. Keep HR and the business informed
4. This is a learning process for everyone so don't be afraid to ask questions along the way



# Questions?

Thank you for your time today  
&  
Happy Reporting!