HR Compliance and Infrastructure Roadmap

Nguyen HR Partners | Practical HR Resource

Operational Benchmarks & Regulatory Milestones for High-Growth Companies

How to use this roadmap: Use headcount as an early-warning signal for HR infrastructure planning — not as a substitute for jurisdiction-specific legal review. Different laws use different counting rules, coverage periods, and worksite tests.

1. Growth Phase I: Scaling from 1 to 50 Employees

Focus: Build compliant foundations, standardize core practices, and prepare before major federal thresholds are crossed.

Headcount	Early planning focus
1–14 employees	Core wage and hour, Form I-9, safety, payroll, and state setup.
15–19 employees	Title VII, ADA, PWFA, and GINA coverage.
20–49 employees	ADEA; COBRA analysis for covered health plans.
50+ employees	FMLA coverage; ACA ALE analysis; contractor AAP review.

Stage A: Core Setup (1–14 Employees)

FEDERAL / OPERATIONAL BASELINE

FLSA: Minimum wage, overtime, exempt/non-exempt classification, recordkeeping, and child-labor rules where applicable.

IRCA / Form I-9: Complete employment-eligibility verification within required federal timelines.

Workplace Safety & Compliance: Mandatory workplace notices/posters, payroll-tax registration, unemployment insurance, and workers' compensation requirements as applicable by jurisdiction.

INFRASTRUCTURE PRIORITIES

Create a foundational employee handbook and core operational policies.

Implement reliable payroll, timekeeping, onboarding, and record-retention processes.

Use consistent written job offer letters and detailed job descriptions.

Stage B: Civil Rights Threshold (15–19 Employees)

FEDERAL REGULATORY BASELINE

Title VII: Prohibits covered employment discrimination based on race, color, religion, sex, and national origin.

ADA: Requires covered employers to provide reasonable accommodations and engage in an interactive process.

PWFA & GINA: Expands protections for pregnancy-related accommodation and genetic-information privacy.

INFRASTRUCTURE PRIORITIES

Formalize anti-harassment policies and structured complaint-response procedures.

Train managers on accommodation, retaliation prevention, performance documentation, and escalation protocols.

Transition from ad-hoc spreadsheets toward a secure, central HRIS as record volume increases.

Stage C: Benefits & Age Protections (20–49 Employees)

FEDERAL REGULATORY BASELINE

ADEA: Generally applies at 20 employees, protecting individuals age 40 and older from age-based discrimination.

Federal COBRA: Applies to covered group health plans maintained by employers meeting the 20-employee threshold in the prior calendar year.

INFRASTRUCTURE PRIORITIES

Assign dedicated HR ownership (in-house HR Generalist, expert consultant, or PEO relationship).

Formalize job architecture, compensation bands, performance evaluation processes, and benefits administration.

Establish repeatable employee-relations management and workplace investigation protocols.

Stage D: Major Compliance Threshold (50+ Employees)

FEDERAL REGULATORY BASELINE

FMLA: Covers private employers with 50+ employees in 20+ workweeks; employee eligibility includes tenure, hours, and 75-mile worksite rules.

ACA ALE Status: Based on averaging at least 50 full-time employees (including full-time equivalents) during the prior calendar year.

Affirmative Action (AAP): Certain federal contractors with 50+ employees face AAP obligations depending on contract type and valuation.

INFRASTRUCTURE PRIORITIES

Automate leave-of-absence tracking, ACA measurement/reporting, and benefits administration.

Formalize manager compliance training programs and scalable leadership development.

Build workforce-planning models and regular compensation review rhythms before headcount accelerates further.

Headcount	Early planning focus
Approaching 100	Data preparation, benefit governance, and reporting readiness.
100+ employees	EEO-1 reporting; WARN coverage review; ERISA plan audit evaluation.
150+ employees	Dedicated HR leadership, succession planning, analytics, and integrated HCM.

Focus: Shift from foundational compliance to enterprise reporting, governance, workforce analytics, specialization, and scalable people systems.

Stage A: Enterprise Reporting Threshold (100+ Employees)

FEDERAL REGULATORY BASELINE

EEO-1 Component 1 Reporting: Mandatory for private employers with 100+ employees, subject to EEOC rules and annual filing deadlines.

WARN Act: Applies to employers meeting the 100-employee coverage threshold; advance notice obligations depend on the size and scope of plant closings or mass layoffs.

ERISA Form 5500: Independent audit requirements trigger based on plan participant counts (large plan rules), rather than company-wide headcount alone.

INFRASTRUCTURE PRIORITIES

Create specialized HR capabilities (Talent Acquisition, People Operations, Total Rewards, HRBP, L&D).

Conduct periodic pay-equity audits and formal compensation-structure reviews.

Establish rigorous data governance for EEO, benefits, payroll, leave, and workforce analytics.

Stage B: Scaled Governance & Organizational Complexity (150+ Employees)

REGULATORY & ORGANIZATIONAL COMPLEXITY

Wage & Hour Exposure: Heightened regulatory scrutiny requires accurate timekeeping, job re-classifications, break compliance, and strict manager oversight.

Remote & Multi-State Scale: Multi-state growth introduces overlapping payroll tax, paid leave, expense reimbursement, pay transparency, and local labor law mandates.

INFRASTRUCTURE PRIORITIES

Leadership Structure: Establish senior executive HR leadership (Head of People, VP of People, or CHRO).

Talent Analytics: Track turnover, time-to-fill, cost-per-hire, time-to-productivity, representation, engagement, and workforce capacity.

Succession Planning: Identify critical roles, key personnel risks, and build internal leadership pipelines.

HR Technology Suite: Integrate HRIS/HCM, payroll, benefits administration, performance, recruiting, and learning management platforms.

3. Executive HR Compliance Checklist by Headcount

Headcount	Federal triggers or review areas	Core HR systems and deliverables
1–14	FLSA, Form I-9, payroll tax, workplace safety, state unemployment and workers' compensation.	Employee handbook, timekeeping/payroll, job offer letters, job descriptions, onboarding and record retention.
15–19	Title VII, ADA, PWFA, GINA protections.	Accommodation process, complaint and anti-harassment procedures, manager training, secure HRIS setup.
20–49	ADEA age protections; federal COBRA analysis for group health plans.	Benefits administration, structured compensation, formal performance review process, dedicated HR ownership.

Headcount	Federal triggers or review areas	Core HR systems and deliverables
50–99	FMLA employer coverage; ACA ALE status; federal contractor AAP obligations, if applicable.	Automated leave tracking, ACA measurement and reporting, manager compliance training, workforce planning.
100–149	EEO-1 filing review; WARN coverage analysis; ERISA Form 5500 large-plan audit review.	Annual compliance calendar, benefits governance, pay-equity reviews, specialized HR operations.
150+	Multi-state expansion and enterprise compliance oversight.	Executive HR leadership, integrated HCM/HR tech stack, talent analytics, succession planning, scalable governance.

4. Operational Best Practices for Transitioning Between Phases

1. Track the right employee-counting method: Different laws count employees differently. ACA uses full-time and full-time-equivalent (FTE) calculations for ALE status; COBRA, FMLA, WARN, EEO-1, and benefit-plan rules each use unique definitions, look-back periods, and worksite tests.

2. Build infrastructure before crossing the threshold: Do not wait until the legal trigger is reached. Begin configuring systems, policies, manager training, and vendor support 3 to 6 months ahead of anticipated growth.

3. Audit state and local variations thoroughly: State and local regulations frequently apply at lower headcount thresholds or create mandates with no direct federal equivalent — including paid sick leave, pay transparency disclosures, mandatory meal/rest breaks, predictive scheduling, and harassment training.

4. Maintain consistent, standardized documentation: As organizations scale, informal verbal agreements create significant legal exposure. Standardize job descriptions, employee-relations documentation, performance logs, compensation decisions, leave files, and policy acknowledgments.

5. Establish an annual compliance calendar: Assign clear ownership and strict deadlines for required notices, EEO/benefit filings, handbook reviews, compensation audits, manager training sessions, and multi- state registration renewals.

THE PRACTICAL RULE

Build HR infrastructure one stage before you need it. Growth is significantly easier — and substantially less expensive — when compliance systems, manager habits, and clean data are already firmly in place.

LEGAL DISCLAIMER: General US HR guidance only. Federal compliance thresholds may depend on workforce calculations, plan terms, contract status, worksite rules, and specific operational facts. State and local laws may impose earlier thresholds or stricter obligations. Consult qualified legal counsel or an appropriately qualified HR professional for jurisdiction-specific advice.