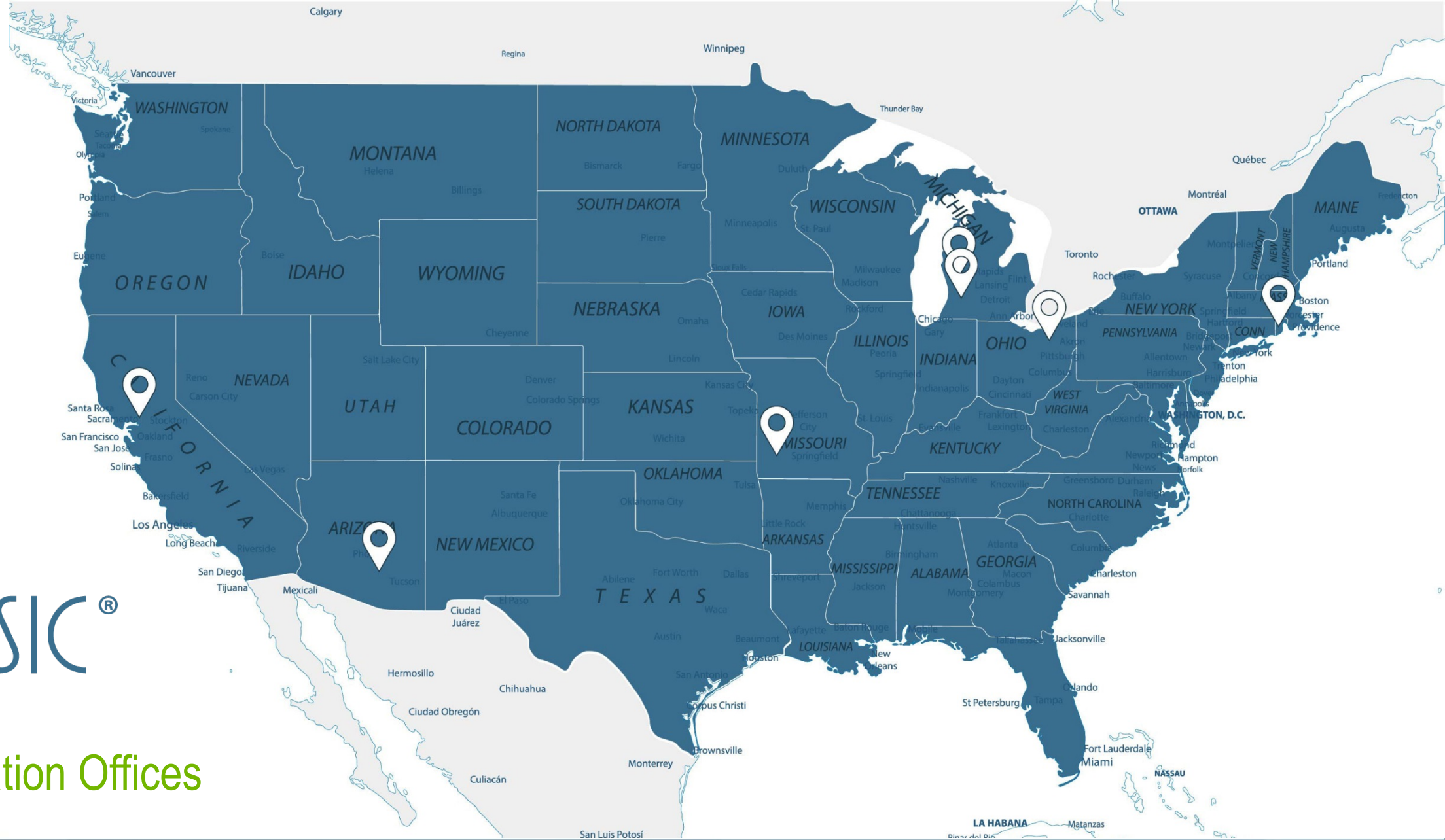




FMLA

The Basics and COVID-19 Considerations





Administration Offices

Technology Driven HR Solutions to Take Your Company Further

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HR Solutions should be simple. **Keep it BASIC.**

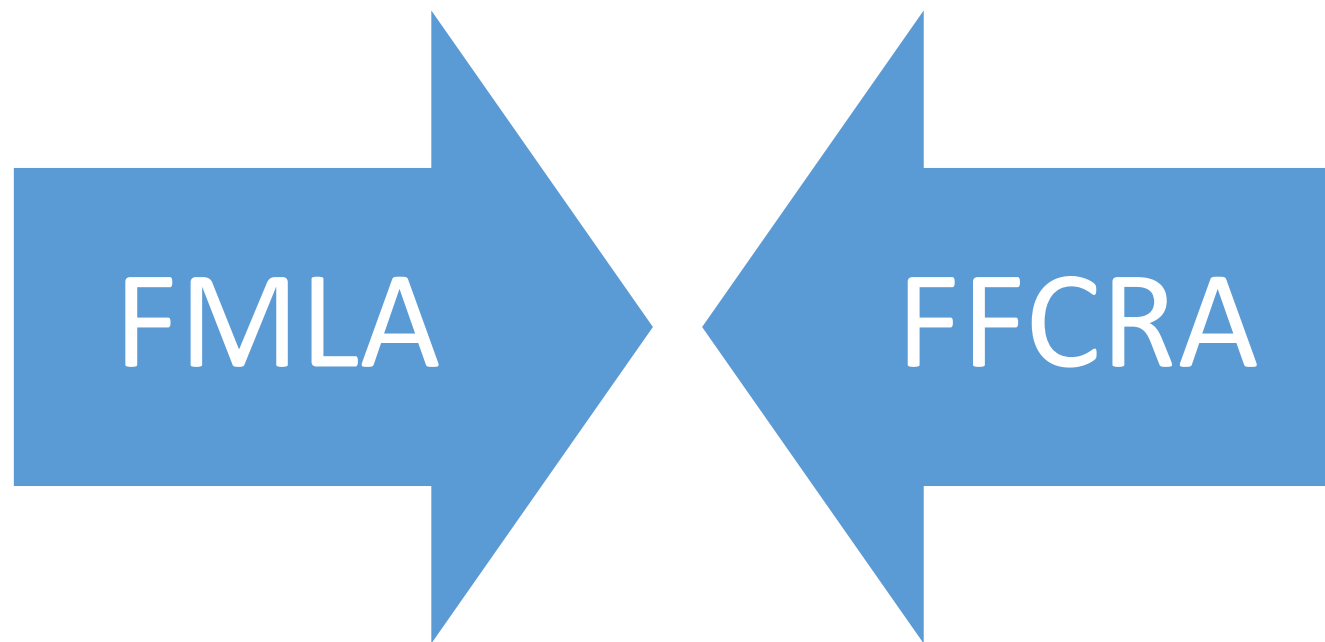
➤ Presenter



Allyson Terpsma

Allyson Terpsma is an attorney with Warner Norcross + Judd, a leading Michigan law firm with more than 200 attorneys. Allyson focuses her practice on labor and employment counseling and litigation. She guides employers through difficult workforce situations and advises them on disability accommodation and leave issues, civil rights laws, labor relations and wage and hour compliance. Allyson also has represented employers in administrative agency investigations and proceedings, labor arbitration hearings, and civil litigation.

➤ Introduction



➤ FMLA



➤ Which Employers Are Covered?

- Private sector employers
 - 50+ employees in 20+ workweeks in current or previous calendar year
- Public agencies
- Federal government
- Schools

➤ Which Employers Are Covered? (cont'd)

- Integrated employers - Separate businesses with:
 - Common management
 - Interrelated operations
 - Centralized control of labor relations
 - Common ownership or financial control
- Joint employers: 2+ businesses exercise control over work or working conditions
 - E.g., temp agency and its client
- Successor employers

➤ What Does the FMLA Provide?

- 12 work weeks of unpaid leave within a 12-month period
 - 12 month period:
 - Calendar year
 - Any fixed 12 months (e.g., fiscal year, anniversary year)
 - 12 months measured forward from first date of FMLA leave
 - Rolling 12 month period measured backward from date of FMLA leave
- 26 weeks to care for a covered service member

➤ What Does the FMLA Provide? (cont'd)

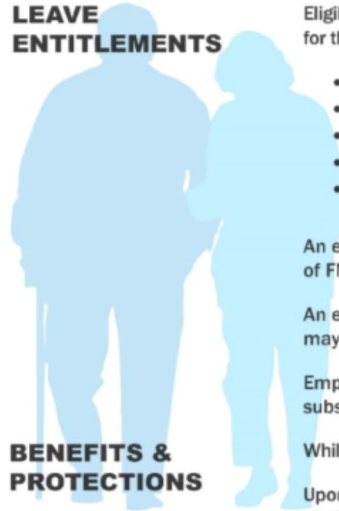
- Leave can be intermittent
- Continued health benefits
- Reinstatement to the same or equivalent position
 - Exceptions:
 - Would not otherwise have been employed
 - Key employees
 - Paid on salary basis as defined by FLSA, and among the highest paid 10 percent of all employees employed within 75 miles of the employee's worksite
 - Restoration (not absence) of the key employee will cause substantial and grievous economic injury to employer's operations

Employer Notice

EMPLOYEE RIGHTS UNDER THE FAMILY AND MEDICAL LEAVE ACT

THE UNITED STATES DEPARTMENT OF LABOR WAGE AND HOUR DIVISION

LEAVE ENTITLEMENTS



Eligible employees who work for a covered employer can take up to 12 weeks of unpaid, job-protected leave in a 12-month period for the following reasons:

- The birth of a child or placement of a child for adoption or foster care;
- To bond with a child (leave must be taken within 1 year of the child's birth or placement);
- To care for the employee's spouse, child, or parent who has a qualifying serious health condition;
- For the employee's own qualifying serious health condition that makes the employee unable to perform the employee's job;
- For qualifying exigencies related to the foreign deployment of a military member who is the employee's spouse, child, or parent.

An eligible employee who is a covered servicemember's spouse, child, parent, or next of kin may also take up to 26 weeks of FMLA leave in a single 12-month period to care for the servicemember with a serious injury or illness.

An employee does not need to use leave in one block. When it is medically necessary or otherwise permitted, employees may take leave intermittently or on a reduced schedule.

Employees may choose, or an employer may require, use of accrued paid leave while taking FMLA leave. If an employee substitutes accrued paid leave for FMLA leave, the employee must comply with the employer's normal paid leave policies.

While employees are on FMLA leave, employers must continue health insurance coverage as if the employees were not on leave.

Upon return from FMLA leave, most employees must be restored to the same job or one nearly identical to it with equivalent pay, benefits, and other employment terms and conditions.

An employer may not interfere with an individual's FMLA rights or retaliate against someone for using or trying to use FMLA leave, opposing any practice made unlawful by the FMLA, or being involved in any proceeding under or related to the FMLA.

An employee who works for a covered employer must meet three criteria in order to be eligible for FMLA leave. The employee must:

- Have worked for the employer for at least 12 months;
- Have at least 1,250 hours of service in the 12 months before taking leave;* and
- Work at a location where the employer has at least 50 employees within 75 miles of the employee's worksite.

*Special "hours of service" requirements apply to airline flight crew employees.

BENEFITS & PROTECTIONS

ELIGIBILITY REQUIREMENTS

➤ Employer Notice (cont'd)

REQUESTING LEAVE

Generally, employees must give 30-days' advance notice of the need for FMLA leave. If it is not possible to give 30-days' notice, an employee must notify the employer as soon as possible and, generally, follow the employer's usual procedures.

Employees do not have to share a medical diagnosis, but must provide enough information to the employer so it can determine if the leave qualifies for FMLA protection. Sufficient information could include informing an employer that the employee is or will be unable to perform his or her job functions, that a family member cannot perform daily activities, or that hospitalization or continuing medical treatment is necessary. Employees must inform the employer if the need for leave is for a reason for which FMLA leave was previously taken or certified.

Employers can require a certification or periodic recertification supporting the need for leave. If the employer determines that the certification is incomplete, it must provide a written notice indicating what additional information is required.

EMPLOYER RESPONSIBILITIES

Once an employer becomes aware that an employee's need for leave is for a reason that may qualify under the FMLA, the employer must notify the employee if he or she is eligible for FMLA leave and, if eligible, must also provide a notice of rights and responsibilities under the FMLA. If the employee is not eligible, the employer must provide a reason for ineligibility.

Employers must notify its employees if leave will be designated as FMLA leave, and if so, how much leave will be designated as FMLA leave.

ENFORCEMENT

Employees may file a complaint with the U.S. Department of Labor, Wage and Hour Division, or may bring a private lawsuit against an employer.

The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement that provides greater family or medical leave rights.



For additional information or to file a complaint:

1-866-4-USWAGE

(1-866-487-9243) TTY: 1-877-889-5627



WWW.WAGEHOUR.DOL.GOV

U.S. Department of Labor | Wage and Hour Division

WH1420a REV 04/16

➤ Employer Notice (cont'd)

- DOL also requires employers to:
 - Include the FMLA notice poster in their handbooks; or
 - Incorporate its provisions in their handbook policies
- Policy should specify employer-specific information, *e.g.*, required use of PTO, 12-month period

➤ Why Can Employees Take Leave?

- Serious health condition
 - Employee's own condition
 - To care for spouse, parent, or child with a serious health condition
- Child's birth, adoption or foster care placement
 - If both spouses work for same employer, combined leave time is limited to 12 weeks for new child leave or leave to care for a parent with a serious health condition
- Care for a covered service member or qualifying exigency

➤ “Serious Health Condition” – Inpatient Care

- Condition involving inpatient care
 - An overnight stay in a hospital, hospice, or residential medical care facility
 - Includes any period of incapacity or any subsequent treatment in connection with the overnight stay

➤ “Serious Health Condition” – Incapacity & Continuing Treatment

- Condition of incapacity for more than 3 consecutive, full calendar days and continuing treatment
 - Continuing treatment:
 - Two or more in-person visits to a health care provider for treatment within 30 days of the first day of incapacity unless extenuating circumstances exist. The first visit must be within seven days of the first day of incapacity; or,
 - At least one in-person visit to a health care provider for treatment within seven days of the first day of incapacity, which results in a regimen of continuing treatment under the supervision of the health care provider (e.g., prescription medication or therapy requiring special equipment)

➤ “Serious Health Condition” – Chronic Condition

- Chronic, long-term or permanent condition that requires periodic treatment
 - A chronic serious health condition is one which requires visits to a health care provider (or nurse supervised by the provider) at least twice a year and recurs over an extended period of time
 - A chronic condition may cause episodic rather than a continuing period of incapacity
 - Examples: diabetes, asthma, migraine headaches

➤ “Serious Health Condition” – Permanent or LT Incapacity

- Permanent or long-term incapacity due to a condition for which treatment may not be effective
 - The employee or family member must be under the continuing supervision of, but need not be receiving active treatment by, a health care provider
 - Examples: Alzheimer's, a severe stroke, or the terminal stages of a disease

➤ “Serious Health Condition” – Treatments; Pregnancy

- Any period of absence to receive multiple treatments (including any recovery period from such treatments) by a health care provider for:
 - Restorative surgery after an accident or other injury; or
 - A condition that would likely result in a period of incapacity of more than 3 consecutive, full calendar days in the absence of medical intervention or treatment
 - Examples: cancer (chemotherapy, radiation, etc.), severe arthritis (physical therapy), or kidney disease (dialysis)
- Condition caused by pregnancy or prenatal care

➤ “Serious Health Condition” – COVID-19

- COVID-19 and its complications may constitute a serious health condition
- No FMLA leave for:
 - Avoiding COVID-19
 - Exposure to COVID-19

➤ Employee Notice Requirements

- Employees need not expressly assert FMLA when they first ask for leave
- But calling in sick is insufficient
- Employees must explain reasons for leave to allow employer to determine whether FMLA applies
- If in doubt, employer must “inquire further”

➤ Employee Notice Requirements (cont'd)

- An employee must provide at least 30 days advance notice before FMLA leave is to begin if the need for the leave is foreseeable
- If 30 days notice is not practicable, notice must be given as soon as possible and practical

➤ Employee Notice?

- Sufficient notice?
 - “I’m too sick to work and am going to the emergency room.”
 - Byron v. St. Mary's Med. Ctr. (E.D. Mich. 2012)
 - Text message: “I can’t be on call tonight – my father is in the ER.”
 - Lanier v. Univ. of Texas Sw. Med. Ctr. (5th Cir. 2013)

➤ Employee Notice? (cont'd)

- Kobus v. Coll. of St. Scholastica, Inc. (8th Cir. 2010)
 - Employee told supervisor that he needed a “mental health leave” to deal with head and neck pain caused by stress and anxiety
 - Supervisor “prudently” asked whether employee was requesting FMLA leave
 - When told a doctor would have to provide a certification, employee replied, “I don't have a doctor. Is there any other way I can go?”
 - When supervised that no other leave was available, employee resigned
 - Court held that employee failed to adequately state an intent to take FMLA leave

➤ Employer Notice (cont'd)

- When an employee requests FMLA leave, or the employer becomes aware that an employee's leave may be for an FMLA-qualifying reason, the employer must provide notice of the employee's eligibility for FMLA leave within 5 business days, absent extenuating circumstances
- The eligibility notice must:
 - State that the employee is FMLA-eligible; or
 - At least 1 reason why the employee is not eligible.
- The employer must also provide a written rights and responsibilities notice with the eligibility notice

➤ Employer Notice (cont'd)

Notice of Eligibility and Rights & Responsibilities (Family and Medical Leave Act)

U.S. Department of Labor
Wage and Hour Division



OMB Control Number: 1235-0003
Expires: 8/31/2021

In general, to be eligible an employee must have worked for an employer for at least 12 months, meet the hours of service requirement in the 12 months preceding the leave, and work at a site with at least 50 employees within 75 miles. While use of this form by employers is optional, a fully completed Form WH-381 provides employees with the information required by 29 C.F.R. § 825.300(b), which must be provided within five business days of the employee notifying the employer of the need for FMLA leave. Part B provides employees with information regarding their rights and responsibilities for taking FMLA leave, as required by 29 C.F.R. § 825.300(b), (c).

[Part A – NOTICE OF ELIGIBILITY]

TO:

Employee

FROM:

Employer Representative

DATE:

➤ Eligible for FMLA?

- Employees who have worked
 - With the employer for a year or more;
 - 1250+ hours within the past 12 months; AND
 - At a site within 75 miles of which the employer has 50+ employees



➤ Certifications

- Certification of Health Care Provider for Employee's Serious Health Condition (WH-380-E)
- Certification of Health Care Provider for Family Member's Serious Health Condition (WH-380-F)
- Certification of Qualifying Exigency For Military Family Leave (WH-384)
- Certification for Serious Injury or Illness of Covered Service Member -- for Military Family Leave (WH-385)
- Certification for Serious Injury or Illness of a Veteran for Military Caregiver Leave (WH-385-V)

➤ Medical Certification

- List essential job functions or include a job description
- Healthcare provider's contact information and practice/specialization
- Approximate date on which the serious health condition began, and its probable duration
- Medical facts, such as symptoms, diagnosis, hospitalization, doctor visits, whether medication has been prescribed, or any other continuing treatment

➤ Medical Certification (cont'd)



- Information to establish:
 - Necessity of leave
 - Likely duration of leave
 - Estimated dates and frequency of leave if seeking intermittent leave or reduced schedule

➤ Recertification

- May request recertification no more than every 30 days or minimum duration of condition, whichever is greater, unless:
 - Employee requests extension
 - Circumstances change
 - Employer doubts continuing validity of certification
- May request recertification every 6 months even if condition expected to last longer
- May NOT require doctor's note for each absence confirming its relation to condition that qualifies for FMLA intermittent leave
- May obtain a new certification ever year
 - Still eligible?
 - Second or third opinion?

➤ Employer Notice (cont'd)

- Insufficient information about the reason for an employee's use of leave → inquire further
- Sufficient information to determine whether the leave is being taken for a FMLA-qualifying reason (e.g., after receiving a certification) → notify the employee whether leave will be designated and counted as FMLA leave within 5 business days absent extenuating circumstances
 - March 2019: DOL clarifies that “an employer is prohibited from delaying the designation of FMLA-qualifying leave as FMLA leave,” even if employee requests the delay

Designation Notice

We have reviewed your request for leave under the FMLA and any supporting documentation that you have provided. We received your most recent information on _____ and decided:

Your FMLA leave request is approved. All leave taken for this reason will be designated as FMLA leave.

The FMLA requires that you notify us as soon as practicable if dates of scheduled leave change or are extended, or were initially unknown. Based on the information you have provided to date, we are providing the following information about the amount of time that will be counted against your leave entitlement:

Provided there is no deviation from your anticipated leave schedule, the following number of hours, days, or weeks will be counted against your leave entitlement: _____

Because the leave you will need will be unscheduled, it is not possible to provide the hours, days, or weeks that will be counted against your FMLA entitlement at this time. You have the right to request this information once in a 30-day period (if leave was taken in the 30-day period).

Please be advised (check if applicable):

You have requested to use paid leave during your FMLA leave. Any paid leave taken for this reason will count against your FMLA leave entitlement.

We are requiring you to substitute or use paid leave during your FMLA leave.

You will be required to present a fitness-for-duty certificate to be restored to employment. If such certification is not timely received, your return to work may be delayed until certification is provided. A list of the essential functions of your position **is** **is not** attached. If attached, the fitness-for-duty certification must address your ability to perform these functions.

Additional information is needed to determine if your FMLA leave request can be approved:

The certification you have provided is not complete and sufficient to determine whether the FMLA applies to your leave request. You must provide the following information no later than _____, unless it is not practicable under the particular circumstances despite your diligent good faith efforts, or your leave may be denied.
(Provide at least seven calendar days)

(Specify information needed to make the certification complete and sufficient)

We are exercising our right to have you obtain a second or third opinion medical certification at our expense, and we will provide further details at a later time.

Your FMLA Leave request is Not Approved.

The FMLA does not apply to your leave request.

You have exhausted your FMLA leave entitlement in the applicable 12-month period.

➤ Post-Designation

- Inform supervisor about nature and timing of leave
 - Do not provide medical information
- Continuous leave: Follow up if employee fails to provide requested updates or fitness-for-duty certification, or fails to return to work
- Intermittent leave: Compare actual leave used to certification

➤ Recordkeeping

- **What?**
 - Basic payroll and identifying data
 - Dates/hours of leave
 - Notices
 - Leave policies
 - Premium payments for employee benefits
 - Any dispute-related documents
- **How long?**
 - 3 years

➤ FMLA Abuse?

- Honest suspicion may arise based on patterns, timing, frequency, or duration of absences
- Commonly used investigative tools:
 - Social Media
 - Word-of-Mouth
 - Video Surveillance

➤ FMLA Abuse? (cont'd)

- Nelson v. Oshkosh Truck Corp. (E.D. Wis. 2008)
 - Employee suffered from migraines and anxiety
 - Employer became suspicious when employee physically delivered work restriction (3 weeks' leave) after calling in
 - Certification indicated employee was unable to perform employment functions such as standing, sitting, walking, moving her arms, lifting, and speaking
 - Surveillance video showed employee driving, shopping, walking, standing, changing a tail light, carrying items
 - At employer's request, doctor clarified that employee's ability to stand, carry, sit, speak, etc. was unpredictable due to mental illness and medication side effects
 - Employer terminated employee for false claim

➤ FMLA Abuse? (cont'd)

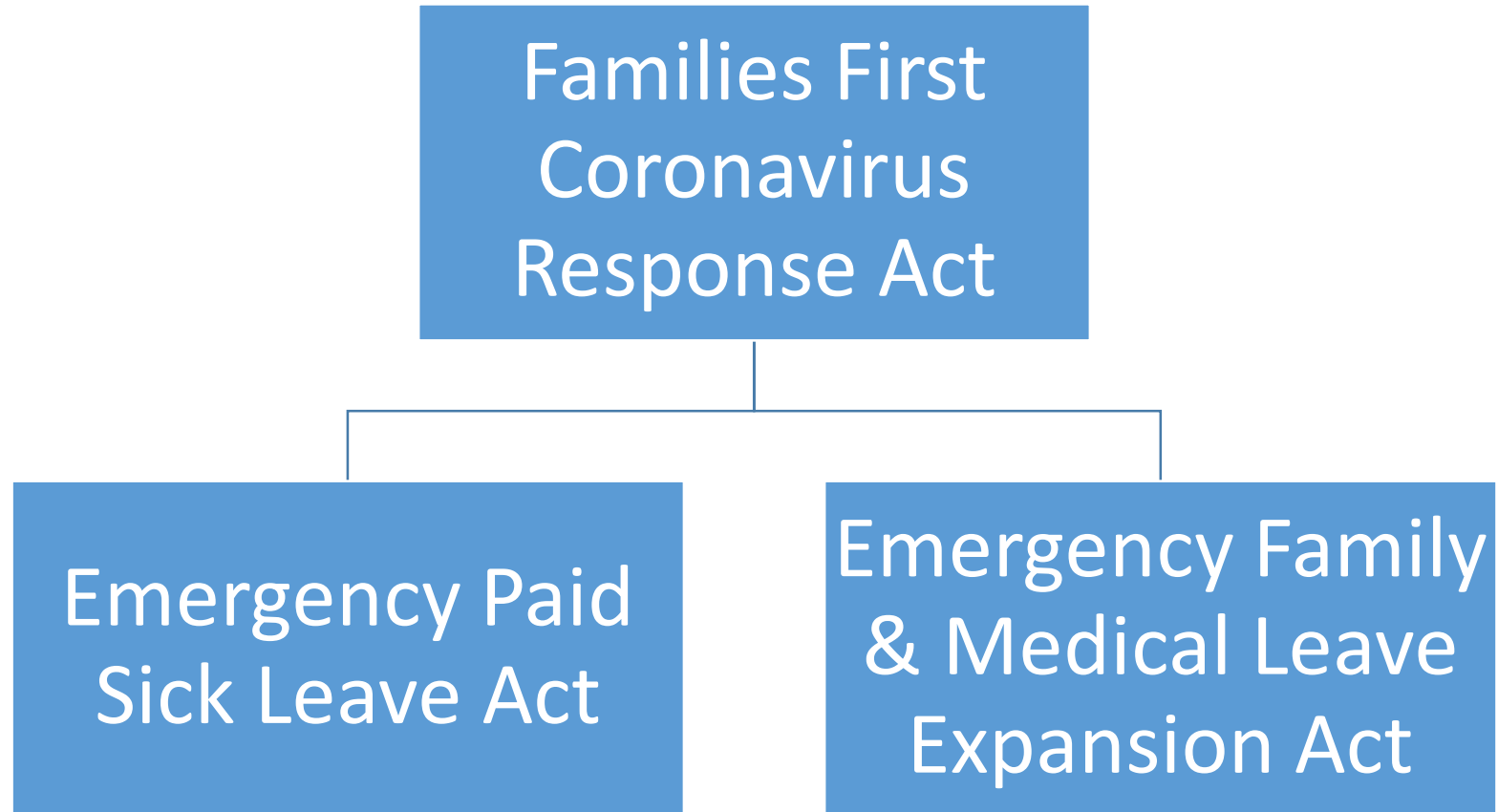
- Nelson v. Oshkosh Truck Corp. (E.D. Wis. 2008) (cont'd)
 - Court denied defendant's motion for summary judgment
 - Doctor's clarification indicates that employee's observed activities were not inconsistent with her limitations
 - Jury could conclude that termination decision was based on:
 - Employer's honest belief that employee had abused her leave
 - OR the opportunity to get rid of an employee with a chronic mental illness whom it regarded as unreliable

➤ Curbing FMLA Abuse

- Update job descriptions
- Require certifications
 - Unless doing so is unreasonable due to COVID-19
- Authenticate/clarify certifications
- Require use of PTO/vacation
- Require efforts to schedule treatment to minimize disruption
- Require compliance with call-in procedures, unless medical certification says otherwise

➤ Don't Retaliate!!

- Gordon v. U.S. Capitol Police (D.C. Cir. 2015)
 - Officer granted intermittent leave for depression treatment
 - Employer then:
 - Required fitness for duty test despite lack of performance issues
 - Took away gun while test was pending
 - Put her on desk duty with no OT
 - Required doctor's notes for each intermittent leave
 - Trial court dismissed interference claim
 - Appellate court reversed and reinstated plaintiff's claim



➤ FFCRA (cont'd)

- Covers employers with under 500 employees
 - Employers with less than 50 employees need not comply if it would “jeopardize the viability of the business as a going concern”
- Applies from April 1 through December 31, 2020
- Benefits must be continued during leave
- Job restoration
- Cost of paid leave is offset by tax credits

➤ Intermittent Leave

- Teleworkers: Allowed, if employer agrees
- In-person workers: Not allowed, *unless*:
 - Care for a child whose school or place of care is closed, or childcare provider is unavailable; and
 - Employer agrees

➤ Emergency Paid Sick Leave Act



➤ What Are the Qualifying Reasons For EPSSL?

1. Federal, state or local quarantine or isolation order related to COVID-19
2. Advised by health care provider to self-quarantine due to concerns related to COVID-19
3. Experiencing symptoms of COVID-19 and seeking medical diagnosis
4. Caring for individual subject to quarantine or isolation order related to COVID-19 or advised by health care provider to self-quarantine due to concerns related to COVID-19
5. Caring for a child whose school has been closed, or whose child care provider is unavailable, due to COVID-19 concerns
6. Experiencing any other “substantially similar condition” as specified by the Secretary of Health and Human Services (in consultation with the Secretary of the Treasury and the Secretary of Labor)

➤ Isolation Orders

- Is a state or local stay-at-home order an isolation order that triggers paid sick leave?
 - DOL indicates it does not if the order causes the employer to close:
 - [I]f a coffee shop closes temporarily or indefinitely due to a downturn in business related to COVID-19, it would no longer have any work for its employees. A cashier previously employed at the coffee shop who is subject to a stay-at-home order would not be able to work even if he were not required to stay at home. As such, he may not take paid sick leave because his inability to work is not due to his need to comply with the stay-at-home order, but rather due to the closure of his place of employment. . . *Similarly, if the order forced the coffee shop to close, the reason for the cashier being unable to work would be because the coffee shop was subject to the order, not because the cashier himself was subject to the order.*

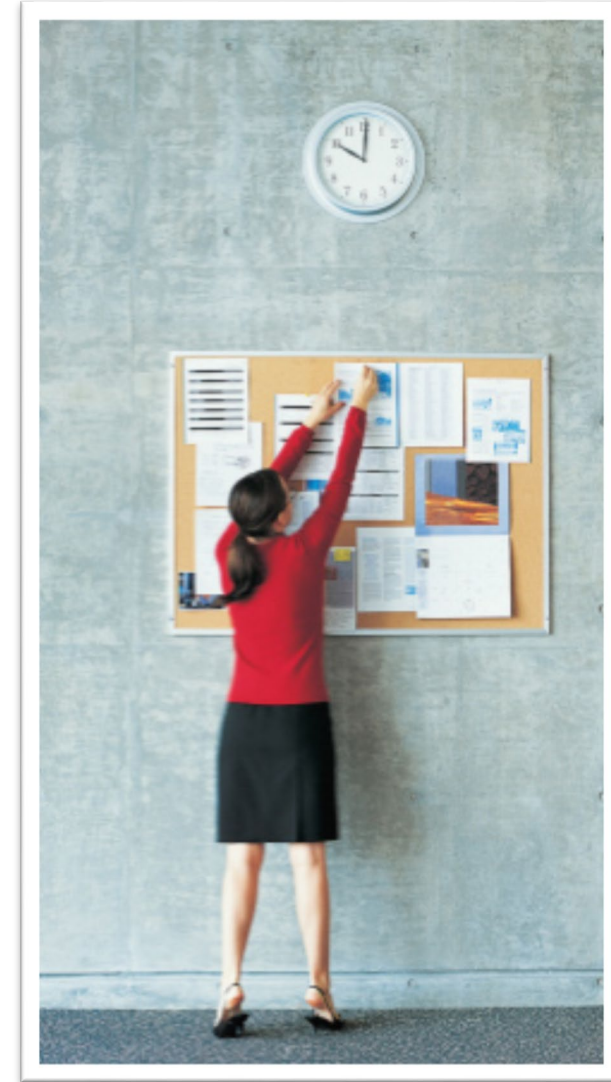
➤ How Much Leave?

- Full-time employees (those normally scheduled for 40 hours or more per week) are eligible for 80 hours of paid leave
- Part-time employees (those normally scheduled for less than 40 hours per week) are entitled to leave in an amount equal to the average number of hours they work over a two week period
- Emergency Paid Sick Leave entitlement is in addition to:
 - FMLA
 - State paid or unpaid sick leave laws
 - Employer leave policies
 - CBA

➤ How Much Pay?

- Employees are entitled to receive full pay, capped at \$511 per day/\$5,110 total, for time missed due to government order or their own health reasons related to COVID-19 (Reasons 1-3)
- Employees are entitled to receive 2/3 pay, capped at \$200 per day/\$2,000 total, for time missed to care for a child or another individual, or due to any other substantially-similar condition (Reasons 4-6)

➤ Emergency Family & Medical Leave Expansion Act



➤ Who Is Eligible for Expanded FMLA?

- Employees employed for 30 or more calendar days (full or part time)
- Employees (1) laid off not earlier than March 1, (2) worked for the employer 30 of last 60 days before layoff, and (3) are subsequently rehired

➤ What Qualifies For Expanded FMLA?

- Unable to work (or telework) due to a need to care for a child if, due to COVID-19:
 - The child's elementary or secondary school has been closed
 - The child's place of care has been closed
 - The child's care provider is unavailable

➤ How Much Leave?

- Up to 12 weeks
- Reduced by FMLA leave already taken in applicable 12-month period

➤ How Much Pay?

- First two weeks:
 - Unpaid
 - May run concurrently with EPSL
 - Employees may elect to use any accrued vacation, personal, medical or sick leave
- After the first two weeks:
 - $\frac{2}{3}$ of the employee's regular rate of pay, multiplied by the number of hours the employee would otherwise have been scheduled to work
 - Capped at \$200 per day/\$10,000 total

➤ Restoration Exceptions

- Small employers (less than 25 employees) may be able to deny job restoration if, at the end of Expanded FMLA leave:
 - The position the employee held no longer exists due to conditions caused by COVID-19;
 - The employer makes reasonable efforts to restore them to an equivalent position; and
 - If those efforts fail, the employer makes reasonable efforts to contact the employee to offer an equivalent position that becomes available within 12 months
- FMLA exceptions

➤ Employer Notice

EMPLOYEE RIGHTS

PAID SICK LEAVE AND EXPANDED FAMILY AND MEDICAL LEAVE UNDER THE FAMILIES FIRST CORONAVIRUS RESPONSE ACT

The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide their employees with paid sick leave and expanded family and medical leave for specified reasons related to COVID-19. These provisions will apply from April 1, 2020 through December 31, 2020.

▶ PAID LEAVE ENTITLEMENTS

Generally, employers covered under the Act must provide employees:

Up to two weeks (80 hours, or a part-time employee's two-week equivalent) of paid sick leave based on the higher of their regular rate of pay, or the applicable state or Federal minimum wage, paid at:

- 100% for qualifying reasons #1-3 below, up to \$511 daily and \$5,110 total;
- ⅔ for qualifying reasons #4 and 6 below, up to \$200 daily and \$2,000 total; and
- Up to 12 weeks of paid sick leave and expanded family and medical leave paid at ⅓ for qualifying reason #5 below for up to \$200 daily and \$12,000 total.

A part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

▶ ELIGIBLE EMPLOYEES

In general, employees of private sector employers with fewer than 500 employees, and certain public sector employers, are eligible for up to two weeks of fully or partially paid sick leave for COVID-19 related reasons (see below). Employees who have been employed for at least 30 days prior to their leave request may be eligible for up to an additional 10 weeks of partially paid expanded family and medical leave for reason #5 below.

▶ QUALIFYING REASONS FOR LEAVE RELATED TO COVID-19

An employee is entitled to take leave related to COVID-19 if the employee is unable to work, including unable to telework, because the employee:

- | | |
|---|---|
| <ol style="list-style-type: none">1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;2. has been advised by a health care provider to self-quarantine related to COVID-19;3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis;4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2); | <ol style="list-style-type: none">5. is caring for his or her child whose school or place of care is closed (or child care provider is unavailable) due to COVID-19 related reasons; or6. is experiencing any other substantially-similar condition specified by the U.S. Department of Health and Human Services. |
|---|---|

▶ ENFORCEMENT

The U.S. Department of Labor's Wage and Hour Division (WHD) has the authority to investigate and enforce compliance with the FFCRA. Employers may not discharge, discipline, or otherwise discriminate against any employee who lawfully takes paid sick leave or expanded family and medical leave under the FFCRA, files a complaint, or institutes a proceeding under or related to this Act. Employers in violation of the provisions of the FFCRA will be subject to penalties and enforcement by WHD.



WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

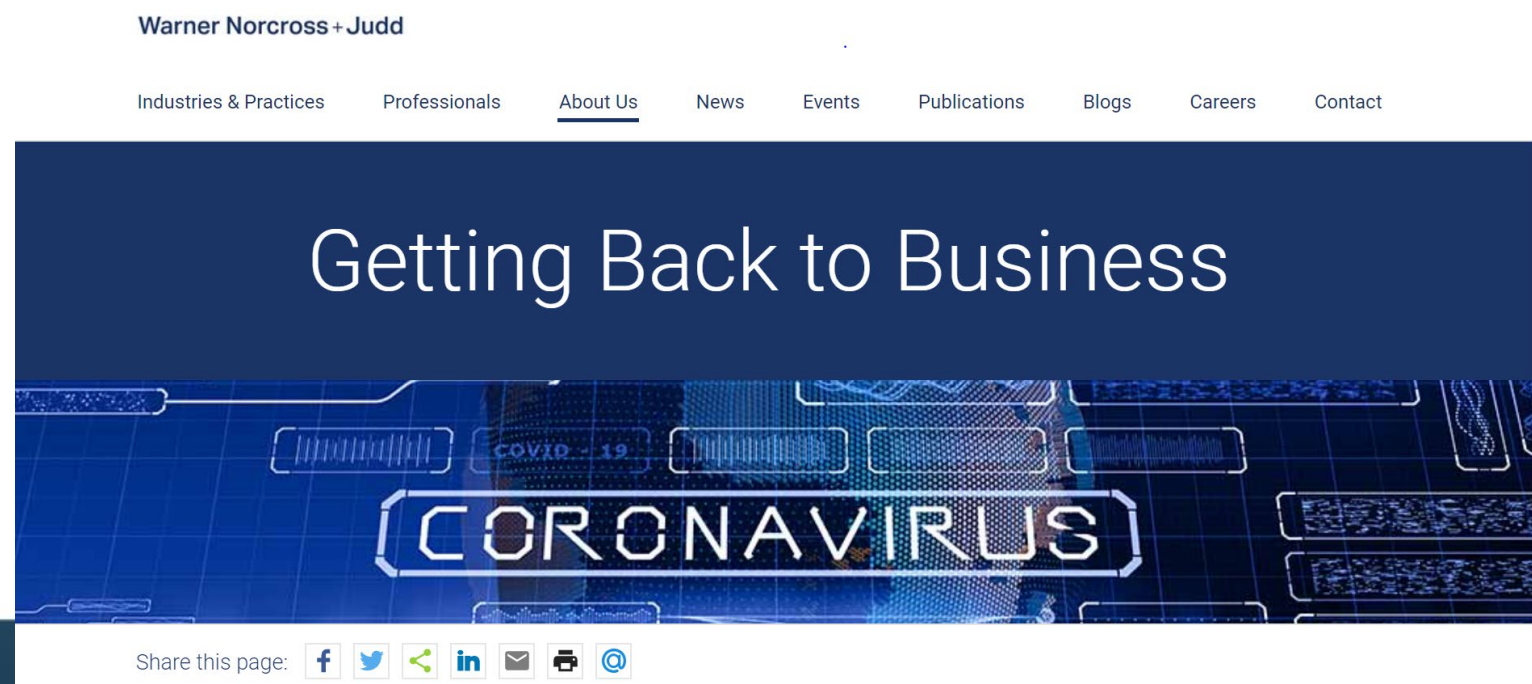
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dol.gov/agencies/whd



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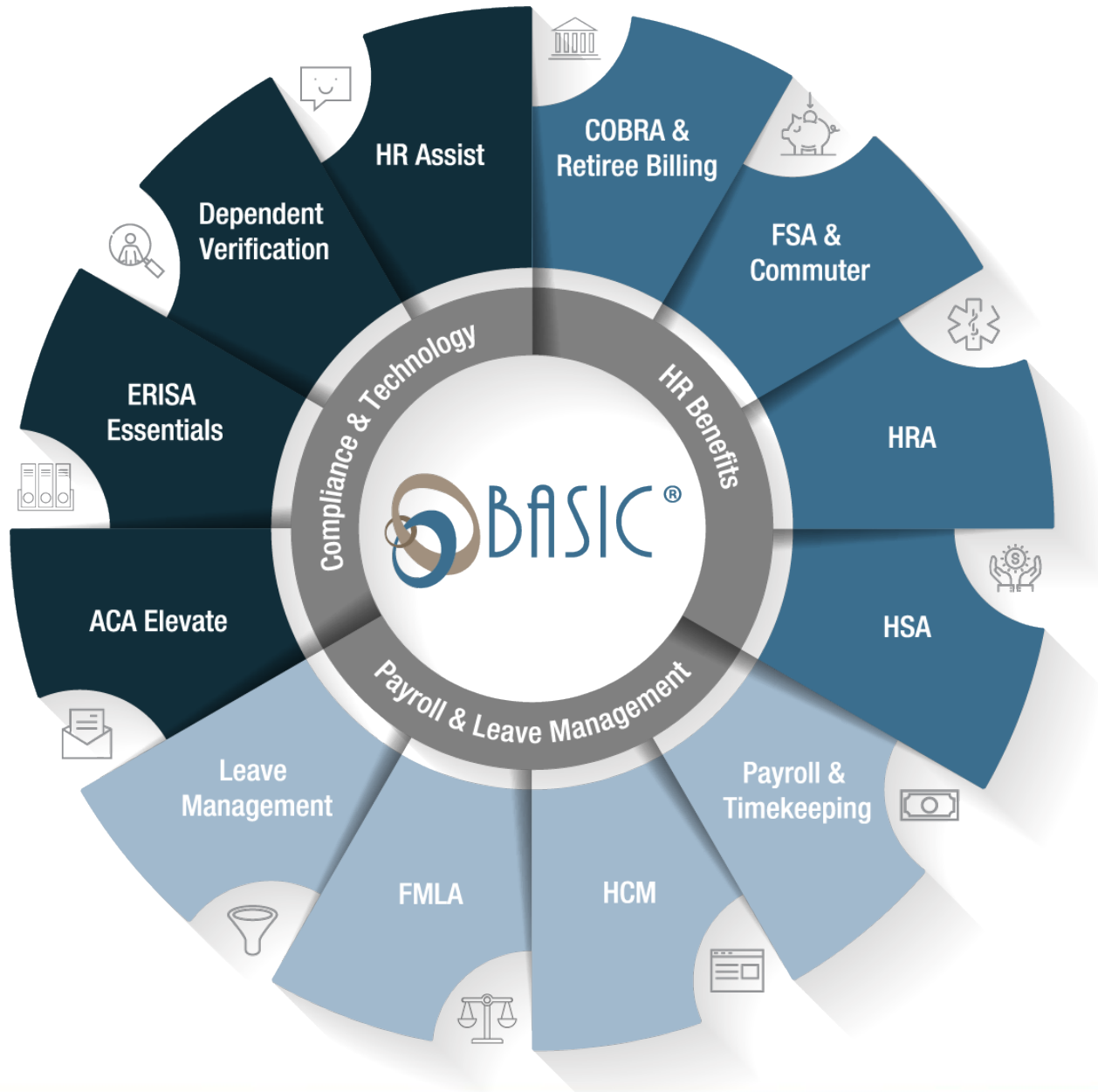
➤ Warner Norcross + Judd Resources

- <https://www.wnj.com/About-Us/COVID-19-Updates>
- eAlerts and webinars



QUESTIONS





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