



Best Practices for Multi- State Employee Handbooks: *The 2025 Playbook*

October 31, 2024

Seyfarth Shaw LLP

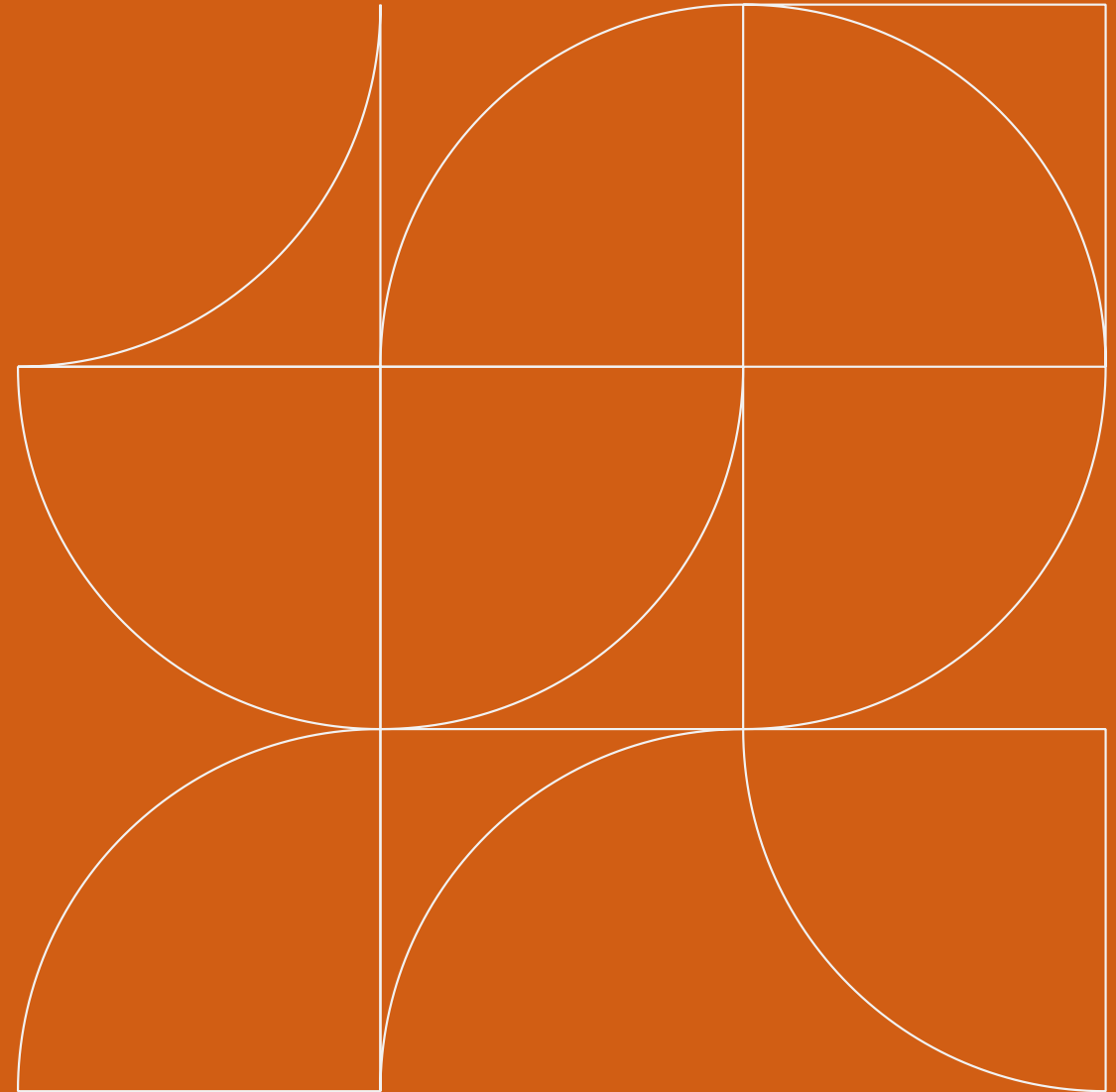
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1

Introduction



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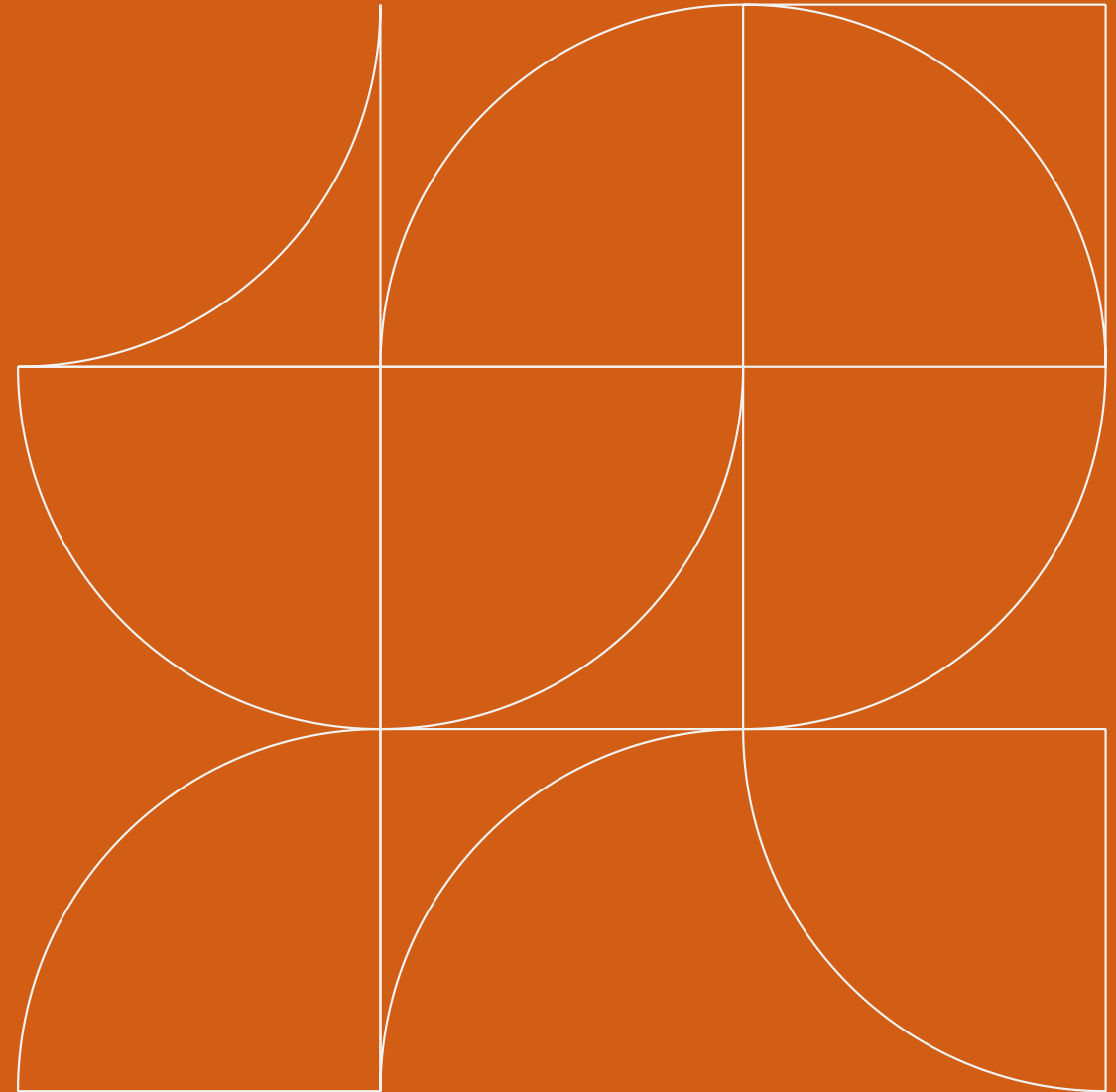


What We Will Cover Today

- 01** Introduction
- 02** Federal and state developments that impact handbooks and policies.
- 03** The importance of an excellent employee handbook and corresponding state addenda.
- 04** How Seyfarth's Handbook & Policy Team has helped employers.
- 05** Trends in the law - what to expect going forward.

2

Federal and State Developments That Impact Handbooks and Policies



Federal Updates

Salary Basis and NLRB Updates

National Labor Relations Board



- Under the NLRA, an employer is generally prohibited from maintaining and applying policies that interfere with the rights of employees to engage in union or other concerted activities.
 - Applies to both union and non-union employees.
- The state of the Board law is always in flux because the makeup is determined by the current administration.
- Continued application of *Stericycle*
 - NLRB held that a facially neutral work rule is unlawful if employee who is subject to the rule and “economically dependent on his employer,” and who “contemplates engaging in protected concerted activity” could interpret the rule to have a “coercive meaning.”
 - “*reasonable tendency*”

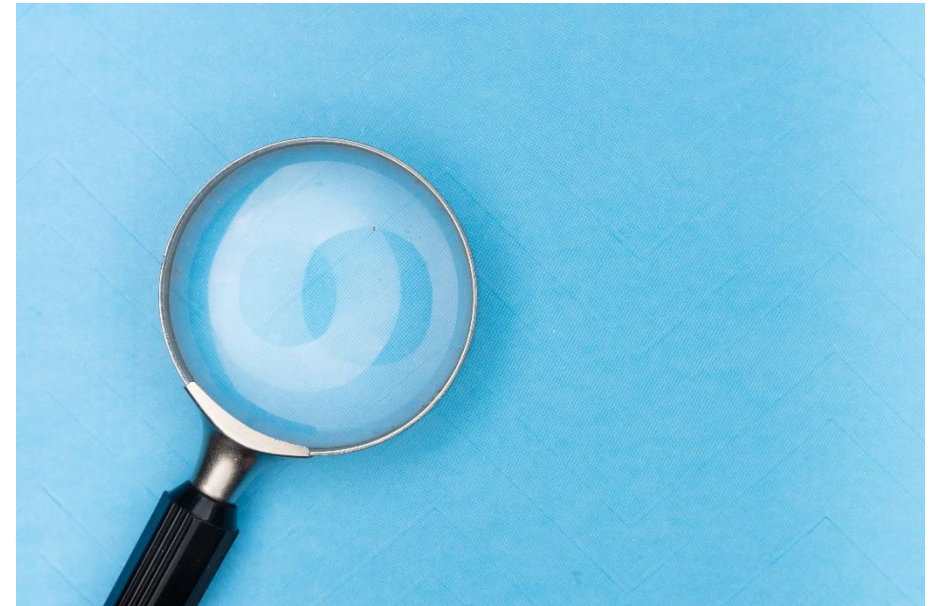


Policies Likely Subject to Scrutiny/Challenge

- Confidentiality (e.g., wages, discipline, investigations)
- Electronic communications (e.g., email, Slack, text, etc.)
- Complaint policies
- Class action waivers
- Dress code and uniform policies
- Third-party access rules
- Solicitation & distribution policies
- At-will disclaimers
- Social media, recording or talking to the media policies

Take A Hard Look At Your Policies

- What are you trying to protect?
- Is it really necessary?
- Can you justify the policy or rule?
- Is that justification anywhere in writing?
- What about “illustrative examples”?
- Consider a “savings clause” or disclaimer language.
 - Be wary, though, of the GC’s invitation to use “prophylactic language.”



US DOL Final Overtime Rule

Eff. July 1, 2024

- 3 core changes to rules framing whether & when an employee may be classified as exempt from FLSA overtime pay requirement
 - Increased salary for “white collar” employees (2024 and again in 2025)
 - HCE increase (2024 and again in 2025)
 - Triennial automatic update to these thresholds



- No changes to the “duties” test for exemptions

New York & New Jersey

New Stuff in the New Year

New York State



Paid Prenatal Personal Leave

- **Effective Date: January 1, 2025**
- Provides employees 20 hours of paid prenatal personal leave per 52-week period
- Prenatal leave is in addition to sick leave
- May be used to receive health care services related to pregnancy (e.g., physical exams, medical procedures, monitoring and testing, and discussions with a HCP)
- Allowed to use in one-hour increments.

Lactation Accommodation Amendments

- **Effective Date: June 16, 2024**
- Prior law required unpaid breaks
- Now required to provide 30-minute **paid** lactation break
- That break is in addition to other paid breaks and unpaid meal period
- Up to 3 years following birth

NY Paid Family Leave

- Max benefit amount - \$1,177.32 as of Jan. 1, 2025

New York State



Workplace Violence Prevention - Retailers

- **Effective Date: March 4, 2025**
- Applies if have 10 retail employees
- Written policy required – DOL will draft model plan
- Retail Store – a store that sells consumer commodities at retail and which is not primarily engaged in the sale of food for consumption on the premises (i.e., restaurant)
- Panic button required for employers with 500 or more employees nationwide – effective January 1, 2027

New York Military Leave

- **Effective Date: September 27, 2024**
- Expanded military leave law to include national guard members called to duty by the NY governor or any other state
- Provides for reinstatement similar to what is required by USERRA
- May only terminate employee for cause for one year following reinstatement

New York City



Worker's Bill of Rights

- **Effective Date: July 1, 2024**
- Employers must provide a notice to new hires and display a worker's bill of rights in English and any language spoken by 5% of more of its employees.
- The notice, which includes a QR Code, takes employees to a website that includes information on broad range of employment law topics
- Information is directed at employees, applicants, and independent contractors
- Includes information on city, state, and federal laws
- Employers can print a PDF of the Worker's Bill of Rights from the NYC website
- Link: [NYC Worker's Bill of Rights](#)

Discrimination – Protected Characteristics

- **Effective Date: November 22, 2023**
- Added height and weight

New Jersey



Paid Family Leave and Temporary Disability

- Max benefit amount increased to \$1,081 as of Jan. 1, 2025

Domestic Worker's Bill of Rights

- **Effective: July 1, 2024**
- Provides protections to domestic workers and obligations to employers (generally, private households)
- Requires certain employment and referral agencies to provide domestic workers with information regarding model contract and provide to employer
- Addresses host of topics including: minimum wage, overtime, regular pay days, paid sick leave, meal periods and rest breaks, privacy rights, health and safety, protection from discrimination, etc.

Discrimination – Remote Employees

- **AG Guidance – May 14, 2024**
- Clarifies that NJ's anti-discrimination law applies to remote employees who work for NJ-based employers
- Applies to employees inside and outside of NJ
- Employees who work outside of NJ may bring a claim under the NJ Law Against Discrimination
- [NJ Attorney General Guidance - Remote Employees](#)

Western States

The final frontier of updates

Colorado



Colorado Privacy Act Amendment – July 1, 2025

- May require employees and applicants to consent to the collection of biometric identifiers for limited uses:
 - to permit access to secure physical locations and hardware/software applications;
 - recording the beginning & end of a work day and meal & rest breaks in excess of 30 minutes;
 - safety/security of employees or workplace; and
 - safety/security of the public in the event of an emergency or crisis situation.
- May not retain biometric data for tracking employees' location or amount of time spent using hardware or software.
- Must obtain voluntary consent to collect biometric identifiers for other purposes.
- Must have written policy that establishes a retention schedule, protocol for responding to data security incidents, and guidelines that require the deletion of biometric identifiers by certain dates.

Living Organ Donor Protections – June 3, 2024

- Protects donors from discrimination / retaliation / adverse action.
- Rebuttable presumption of violation if employer takes action against employee 30 days before – 90 days after operation.

Washington



Paid Sick Leave – January 1, 2025

- New covered reason: after the declaration of an emergency by a local or state government or agency or by the federal government.
- New covered family members: child's spouse and any individual who regularly resides in the employee's home or where the relationship creates an expectation that the employee care for the person, and that individual depends on the employee for care.

Paid Family & Medical Leave – June 14, 2024

- Expanded family leave to include time to bond with an adopted child after the adoption is legally finalized, if the employee has not already exhausted PFML bonding leave during first 12 months following placement of the child.

Oregon



Oregon Family Leave Act & Paid Leave Oregon

- **OFLA Amendments – July 1, 2024**

- Benefit year must begin on the Sunday before the leave begins.
- Covered reasons for use are now limited to:
 - Pregnancy Disability Leave – 12 weeks
 - Sick Child Leave – 12 weeks
 - Bereavement Leave – 2 weeks per family member / 4 weeks per year
 - Adoption/Foster Leave (7/1/2024 – 12/31/2024) – 2 weeks

- **PLO New Covered Reason – January 1, 2025**

- To effectuate the legal process required for placement of a foster child or the adoption of a child.

Utah



Military Leave – March 18, 2024

- Reenacted military leave provisions for reserve members of the armed forces for active duty or training, inactive duty training, or state active duty.
- Utah National Guard and State Defense Force members who are ordered to serve have the same rights and protections as federal military service members under federal law.

Religiously Objectionable Expressions – May 1, 2024

- Employers are prohibited from compelling employees to engage in expression, action, or inaction that burdens or offends a sincerely held religious belief (e.g., dress, grooming, speech, scheduling, prayer, and abstentions related to healthcare).

Midwest

Paid leave updates and more

Illinois



Chicago Paid Leave / Paid Sick Leave – July 1, 2024

- 40 hours/year of PTO + 40 hours of Sick Leave
- Changes to accrual rate; mandatory sick leave carryover; unique payout rules for “unlimited” PTO

Anti-Discrimination

- Eff. 1/1/25, Illinois Human Rights Act amended to prohibit discrimination based on family responsibilities and reproductive health decisions

Worker Freedom of Speech Act

- Eff. 1/1/25, prohibits discrimination or adverse action against an employee because the employee declines to attend or participate in a employer-sponsored meeting or declines to receive or listen to communications from the employer if the meeting or communication is to communicate the opinion of the employer about religious matters or political matters.
- Posting required.

Minnesota



Earned Sick and Safe Time – May 2024 Changes:

- Clarifications to employee coverage
- Adds bereavement as covered reason for leave
- Employers can choose reasonable system to provide ESST balance (need not be pay stub)
- ESST can be used in same increments employees are paid
- *Eff. 1/1/2025:* All PTO and other paid leave for personal illness or injury beyond the ESST minimum – *not including* STD, LTD, or other salary continuation benefits -- must meet or exceed the ESST minimum standards.

Cannabis Testing

- *Eff. Jul. 1, 2024* -- Employers with cannabis testing policies must provide a written notice to affected employees and post the notice in a conspicuous location on its premises.

Paid Family & Medical Leave

- Applies to employers with 1 or more employees
- Contributions begin and benefits will be available January 1, 2026 (wage detail reporting beginning + notices in 2025)

Pregnancy/Prenatal Leave

- Must maintain health benefits during LOA
- Cannot reduce 12 wks of MN leave for prenatal appointments

Jury Duty

- Employers must release an employee from work for prospective juror service; may not require the employee to work an alternative shift on a day they are required to attend jury service.

Michigan



Earned Sick Time Act – Feb. 21, 2025

- Expanded employee and employer coverage
- 1 hour per 30 hours worked
- No accrual cap; use up to 72 hours per year; unlimited carry-over

Missouri



Paid Sick Leave Ballot Initiative (11/5/24)

- If enacted, would provide paid sick leave effective 5/1/2025.
- 1 hour of PSL per 30 hours worked, up to 56 hours.

California

**A few updates from our most
employee-friendly state**

The Statistics

2024 Legislation By The Numbers

- 2,124 bills were introduced this year between the Assembly and Senate.
 - In comparison, last year the State legislature introduced more than 2,600 bills (the most in a decade).
- As of his 2024 signing deadline, Governor Newsom took action on **1,206 bills**.
 - The highest number of bills to reach his desk during his tenure as Governor.
- He **signed 1,017 bills** and vetoed 189 bills.
 - This is largely on par with his historical veto rate of 15%.

(Credit: Chris Micheli, LinkedIn Posts)

Paid Family Leave Updates

Paid Family Leave

- For claims filed after January 1, 2024, the maximum weekly CA PFL benefit is \$1,620.
- Effective January 1, 2024, the SDI/PFL withholding rate increases from 0.9 percent to 1.1 percent.
- Effective January 1, 2024, there is ***no wage cap*** on PFL and SDI withholdings. As of January 1, 2024, all wages paid are subject to the SDI and PFL payroll tax. (In 2023, the wage cap was \$153,164.)
- As of January 1, 2025, employers may no longer require employees to take up to two weeks of accrued, unused vacation before the employee's initial receipt of PFL wage replacement benefits.
- Benefit cap remains the same, but lower earning workers will receive more from PFL – 70-90%.

SB 1137

Protected Characteristics: Intersectionality

- **SB 1137**
 - Adds “intersectionality” to the Unruh Civil Rights Act and FEHA’s enumerated list of characteristics protected from discrimination.
 - Intersectionality is defined as the “combination of two or more protected bases.”
 - California is the first jurisdiction to explicitly adopt this concept and clarify how courts should assess overlapping claims involving protected characteristics.
- **AB 1815**
 - Expands the definition of “race” under FEHA by removing the term “historically” and including traits associated with race beyond hair texture and protective hairstyles.
 - The law also adds definitions for “race” and “protective hairstyle” to the Unruh Civil Rights Act.

AB 2499

“Victims” Time Off

- Expands and recasts jury, court, and victim time off provisions as unlawful practices under FEHA.
 - Previously addressed in the Labor Code.
 - By recasting them under FEHA, they are now subject to the CRD’s enforcement authority.
- Prohibits discrimination, retaliation, or terminating employees who:
 - takes time off for jury service, with reasonable notice
 - takes time off to appear in court as a witness under court order
 - is a victim and takes time off to obtain relief for their/their child’s health, safety, welfare, with reasonable notice unless not feasible
 - (for employers with 25 or more employees) is a victim/has a family member who takes time off to assist the family member for various reasons related to **a qualifying act of violence** (instead of crime/crime or abuse), with reasonable notice unless not feasible
- Expands eligibility for reasonable accommodations to include employees who are victims/have family members who are victims of a qualifying act of violence.
- Allows employees to use vacation, personal, PSL and runs concurrently with CFRA/FMLA.
- Employers must inform employees of their rights in writing.

SB 1105

Paid Sick Leave Clarification

- Expands California's existing paid sick leave law for agricultural employees.
- Allows the use of paid sick leave to avoid smoke, heat, or flooding conditions created by a state or local emergency.
- Clarifies this is included in the definition of “preventative care.”
- The law does not define this term, but the FAQs provide other examples of “preventative care” as flu shots and annual exams.

New England

New Stuff in the New Year

Connecticut



Paid Sick Time

- **Effective Dates – Phased In - # CT Employees**
 - 25 employees – January 1, 2025
 - 11 employees – January 1, 2026
 - 1 employee – January 1, 2027
- Applies to **all employees**, not just service workers
- **Accrual rate** – 1 hour sick time/30 hours worked; begin use 120th day
- **Max Annual Accrual & Usage Cap** = 40 hours per 12-month period
- **Carry-Over** = 40 hours
- **Family Member** definition expanded
 - a spouse, domestic partner, sibling, child, grandparent, grandchild or parent
 - individual related to the employee by blood or affinity whose close association with the employee shows to be equivalent to those family relationships
- **Covered reasons** expanded
 - Closure of employer’s place of business or a family member’s school or place of care because of a PHE
 - Determination by health authority that employee or family member poses a risk due to exposure to a communicable illness
 - Reminder – mental health wellness day (Oct. 2023)
- **Cannot require documentation**
- **Notice** – to all current employees and at time of hire
 - [CT Sick Leave Notice](#)
- **Balance notification** (# hours accrued or granted and # used during calendar year)

Connecticut



Voting Time Off

- **Effective Date: June 30, 2024**
- No longer required per sunset provision in law

Family Violence Leave

- **Effective Date (Amendment): October 1, 2024**
- Provides 12 days off per year for employees who are a victim of family violence
- Law amended to cover victims of sexual assault
- If eligible, can receive CT Paid Family & Medical Leave Benefits for these absences

Paid Family and Medical Leave

- Max benefit amount - \$981/week as of Jan. 1, 2025

Massachusetts



Paid Sick Time

- **Effective Date: November 21, 2024**
- Covered reasons expanded to include a pregnancy loss, unsuccessful assisted reproduction (such as in vitro fertilization (IVF)), or a failed adoption or surrogacy.
- Sick time is available to address both the physical and mental effects of such an event on an employee or their spouse.

Paid Family & Medical Leave

- SJC confirmed that benefits do not accrue during leave
- Annual notice – contribution rates – **January 1, 2025**
- Max benefit increased to \$1,170.64 as of Jan. 1, 2025
- Reminder – November 1, 2023 amendment
 - Original PFML Act prohibited employees from using accrued paid leave (e.g., vacation, sick time, personal time, floating holidays) to top off their PFML benefit if using public option
 - Amendment eliminates that restriction - must allow use but cannot require it

Pay Data Reporting – February 1, 2025

- 100 or more employees

Pay Range Disclosure – October 29, 2025

- 50 or more employees

Veterans' Benefits & Services Posting - November 7, 2024

- 50 or more employees
- Post and distribute annually

Maine



Paid Family & Medical Leave

- **Effective Date (Benefits): May 1, 2026**
- Contributions begin January 1, 2025
- Funded through employer & employee contributions
- Applies to most employers (employers with fewer than 15 employees, do not have to contribute)
- Provides 12 weeks of family and medical leave

Captive Audience Ban Notice/Policy

- **Effective Date: January 31, 2024**
- Prohibits adverse action against an employee because
 - declined to attend Company-sponsored meeting or receive/listen to communications from Company that communicate the Company's opinion about religious or political matters
 - employee makes good faith report about violation of policy

New Hampshire



CROWN Act (with a twist)

- **Effective Date: September 1, 2024**
- Prohibits discrimination because employee wears a protective hairstyle (e.g., braids, locs, corn rows, Afro, head wrap)
- Creates **private right of action**
- Do not have to file with NH Human Rights Commission first

Lactation Accommodation

- **Effective Date: July 1, 2025**
- Policy required
- Provide policy to employees upon hire
- Must allow reasonable **unpaid** break periods
 - Approximately 30 minutes for every 3 hours of work
- Suitable private, non-bathroom space
- Employee can elect to use meal periods or breaks already offered
- Penalty provision not effective until July 1, 2026

Rhode Island



Temporary Caregiver Leave

- **Effective Date: September 1, 2024**
- Expands duration of leave and benefits
 - January 1, 2025 increase to 7 weeks
 - January 1, 2026 increase to 8 weeks
- Max benefit amount - \$1,070 for July 1, 2024 – June 30, 2024

Independent Contractors – Worker’s Compensation

- **Effective Date: June 17, 2024**
- Requires independent contractor to annually file a Designation of Status Form with the RI Department of Labor & Training for each business to whom the contractor is providing services
- Attest that they are an independent contractor and not entitled to workers’ comp benefits
- Criminal penalties for a hiring entity that knowingly conspires or coerces an employee to misrepresent their status

Vermont



Captive Audience Ban

- **Effective Date: May 28, 2024**
- **Prohibits adverse action against employees who**
 - decline to attend a Company-sponsored meeting or view/participate in communications with the Company that have the primary purpose of communicating the Company's opinion about religious or political matters
 - employee makes good faith report about violation of policy

Anti-Discrimination Law

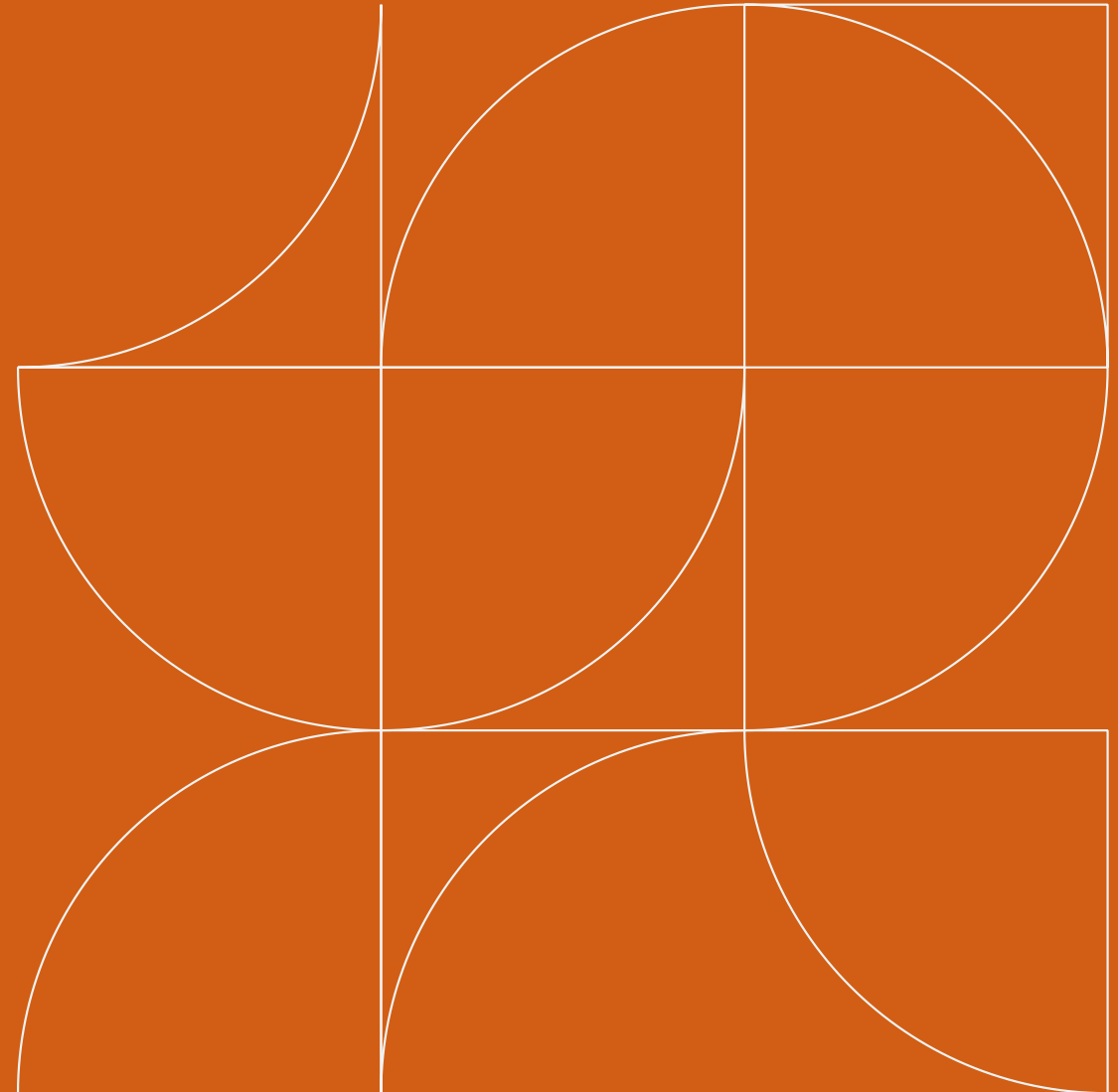
- **Effective Date: July 1, 2024**
- Race redefined to include hair types, textures, styles, and protective hairstyles

Pay Range Disclosure

- **Effective Date: July 1, 2025**
- All advertisements for a VT job opening must include compensation or range of compensation
- Applies to external and internal postings

3

The Importance of an Excellent Employee Handbook and Corresponding State Addenda



What is the Purpose of a Good Handbook?



- Establish uniform expectations
- Obtain acknowledgment of understanding of these expectations from employees
- Showcase workplace benefits
- Give employees something to rely on
- Achieve organizational consistency
- Reduce excessive supervisory discretion
- Deliver notice of legal rights and obligations such as at-will and arbitration
- Communicate required written policies (legal compliance!)
- Not to be a contract, but a reliable guidepost

Why Exactly Do We Need Written Policies?



- Required by law
- Recommended best practice
- New/different practice
- Something went wrong or consistent problem needs to be corrected

Before You Start Drafting



- Establish the purpose of the policy
- A little light reading:
 - the law/laws
 - regulations
 - FAQs
 - legislative history
 - NLRB memos
 - opinion letters
 - enforcement guide
 - case law
- Consider whether template is needed or unique tone

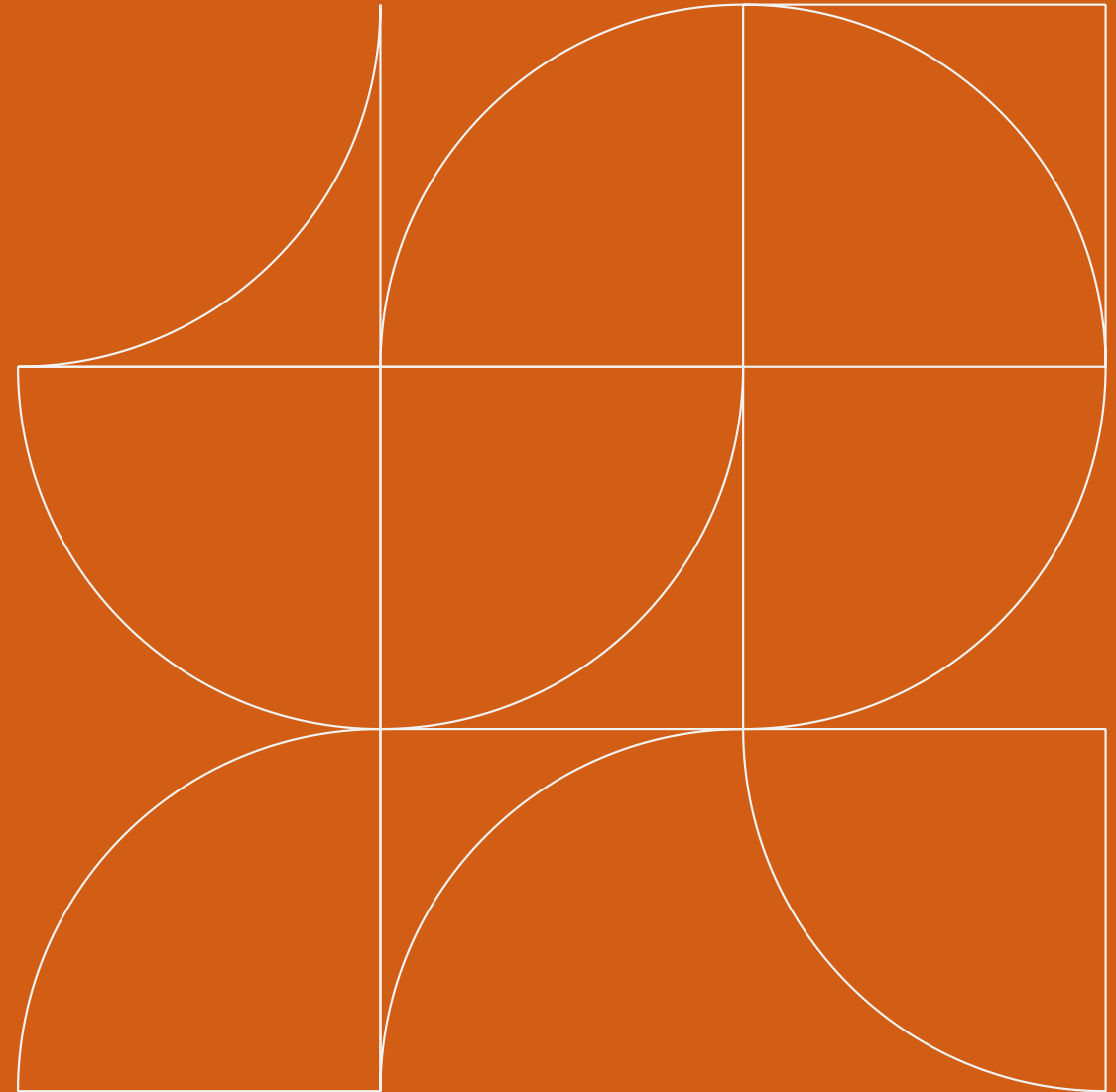
What Should We Tell Employees?



- The Anatomy of a Good Employment Policy Includes:
 - Eligibility – who needs to care about this?
 - Rights – what’s in it for me?
 - Limitations – waiting periods, effective date, reasons for use, etc.
 - Responsibilities – and what do I have to do?
 - Consequences – and what happens if I don’t?
 - Resources – who can I ask if I don’t understand this legalese?
 - Examples if complicated topic (but proceed with caution).

4

How Seyfarth's Handbook & Policy Team Has Helped Employers



Who are we, and what are we doing?



- 35+ attorneys of every level and office
 - trained handbook and policy experts
- Used as both an internal Seyfarth training (not billed to clients) and an external resource building project
- Built an easily updatable and customizable national template and a state addendum for every state (even those that might not need one, just in case you want one)
- Updated questionnaire for employers to tailor handbooks and state addenda
- Partnering with our paid sick leave and paid family leave teams to assist in efficiently managing national resources in those spaces as well

What is it, and what is it not?



IT IS:

- A completely customizable tool
- For clients looking for a new product, we can build from a starting price and add per state based on a sliding scale of complexity of each state's laws (ranging from a few hundred to a few thousand per state)
- Most states can be done for a few hundred dollars each (or can be rendered unnecessary)
- For clients looking for a review of an existing book and state addenda, the documents we already have in place provide current resources for more efficient and cost-effective revisions

IT IS NOT:

- An off the shelf product to give or even sell
- A one size fits all version
- Although not a document that can simply be sold to an employer for use without editing, it requires far less time and customization compared to others and previous projects.

What it can do, and how can we help?



- Provide comprehensive handbook requirements and information for each state at the outset to help employers stay on top of new and changing laws across the nation
- Greatly increase predictability of cost and timing
- Greatly reduce time spent/fees on these projects without compromising the quality and depth of the work
- Similarly, reduce time spent in updating in future years, as the tools continue to be updated by our team
- Contact one of us or our other experts to map out what a project would look like for you



SCAN ME

CLE: NEW PROCESS

Please scan the QR code and complete the digital attendance verification form to receive CLE credit for this program.

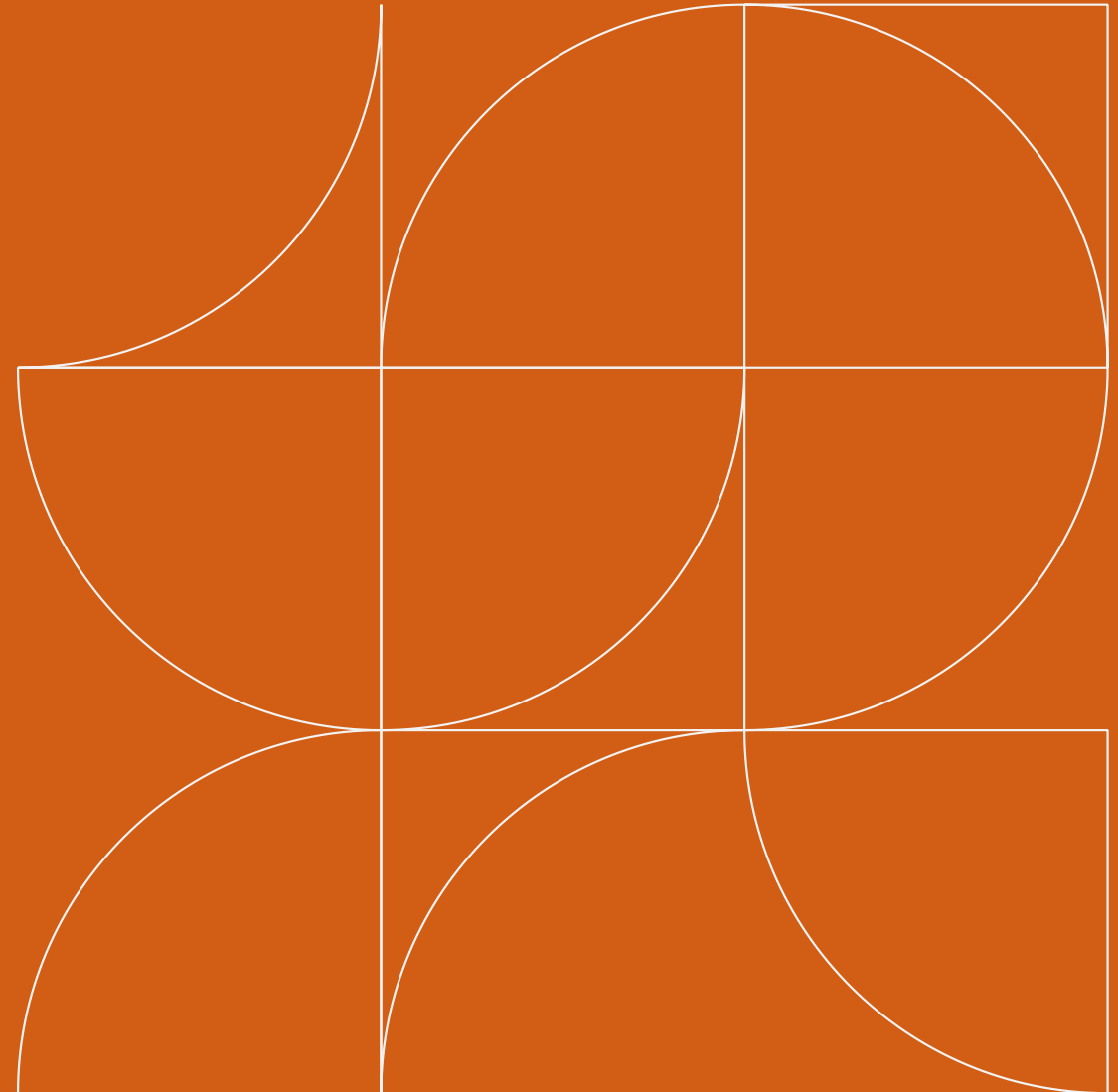
You will need:

1. **Title:** Best Practices for Multi-State Employee Handbooks: The 2025 Playbook
2. **Date Viewed:** 10/31/2024
3. **Attendance Verification Code:** SS_____

State-specific CLE credit information can be found in the form.

5

Trends in the Law & What To Expect Going Forward



What is Driving These Trends?

A hand in a blue sleeve points to the word "TRENDS" written in white chalk on a blackboard. The word is written in a bold, blocky font with diagonal hatching inside the letters.

- **Priorities and policies of current administration**

- Support of unions
- PWFA and PUMP Act
- National Paid Family & Medical Leave
- Limiting non-competition agreements
- Increase minimum wage

* All of that could change if there is a change in administration

- **Social and political issues**

- Union organizing (solicitation/distribution, social media, recording)
- Inequality (discrimination and harassment, DEI&B, pay transparency)
- Reproductive rights

- **Where people work**

- Return to office for some
- Remote/Hybrid here to stay

- **Technology**

- Artificial Intelligence



- Not just disability
- Seeing more robust policies in this space
- Separate policies to cover pregnancy, lactation, and religion
- Driven by passage of PWFA and increase in religious accommodation requests
- Requirements under PWFA are different
 - may require suspension of essential functions
 - circumstances where can request medical documentation more limited
- Domestic violence – employers required to provide accommodation (time off, change in phone # or location of work, installing lock, etc.)



Where are your employees working?

- Post-pandemic continue to see employers hiring in states where did not previously have presence
- Driven largely by desire/need to attract and retain the best talent regardless of location
- Requires employers to be aware of and address local and state employment law requirements where they have employees
 - Discrimination/Harassment
 - Wage & Hour Issues
 - Paid Sick Time/Paid Time Off
 - Paid and Unpaid Family and Medical Leave
 - Other Leave Laws
 - Required Policies in Some States
- Also implicates remote work and hybrid policies



- Expansion of protected classes
 - Explicitly cover sexual orientation, gender expression, and gender identity
 - CROWN Acts (27 states; 50+ municipalities) - Create a Respectful and Open World for Natural Hair
 - Reproductive health decision-making (CA, DE, HI, IL, NY)
 - Height and weight/personal appearance (MI, NYC, DC + handful of other municipalities)
 - Caste (Seattle, Fresno) - discrimination based on social hierarchy determined by a person's birth
 - Victim of domestic violence (CT, NY, RI, IL)
 - Intersectionality (combination of protected characteristics)
- Eliminating requirement that harassment must be severe and pervasive to be unlawful (CA, CO, DC, MD, NY, VT)
- Review policies to ensure aligned with expansion
- Account for state specific requirements

Quick Hits

- **Captive Audience Laws**

- Laws address meetings/information regarding political or religious subjects – cannot mandate attendance
- Designed to target employer meetings regarding unions
- Union organizing up significantly
- Increase in state's passing these laws
- Recently passed in HI, ME, and VT
- Other states: CA, CT, IL, MN, NY, OR and WA

- **Reproductive Loss**

- Employers choosing to include this in bereavement policy or as separate policy
- IL and CA Bereavement Leave laws include reproductive loss
- MA added as covered reason to use sick leave

- **Social Security Number Privacy, Data Privacy, Electronic Monitoring**

- Required policies in some states

- **Gender Neutral Language**



Paid Sick Leave



- Continues to be one of the most challenging compliance issues
- Differences in these laws make creating national policy difficult (e.g., reasons for use, amount of sick time, accrual rate, waiting periods, carry-over, documentation, etc.).
- Move towards these laws including more covered reasons (e.g., bereavement, school activities)
- Paid leave laws v. sick and safe time
- More restrictive limits on requiring employees to provide documentation
- Expect more states/cities to pass these laws

Paid Family & Medical Leave



Continue to see passage of paid family and medical leave legislation – expect that trend to continue

- Currently have **11 mandatory PFML laws**
 - Nine states: CA, CO, CT, MA, NJ, NY, OR, RI, WA
 - District of Columbia
 - San Francisco
- **Two voluntary PFML laws** – NH and VT
- Four additional states in 2026
 - DE - 1/1/25 contributions; 1/1/26 benefits
 - ME - 10/1/25 contributions; 5/1/26 benefits
 - MD – 7/1/25 contributions; 7/1/26 benefits
 - MN - 1/1/26 contributions and benefits
- Most apply to employers with one employee in the jurisdiction
- Likelihood of federal legislation increases if Harris elected

thank
you

Please reach out to us with any questions:

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