

ASAP WEBINAR: 2022 HFWA UPDATES

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**CO Sick Pay Q&A with Michael Santo,
Employment Law Attorney**

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Diana Murray
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1. HFWA Paid Sick Leave (PSL)
2. HFWA Public Health Emergency Leave (PHEL)
3. HFWA Q&A

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Michael Santo, Presenter

Cofounder & Partner, Bechtel & Santo

Employment law attorney Michael Santo is cofounder and partner at Bechtel & Santo in Grand Junction, Colorado. Since 1994, Michael has focused his practice on defending companies in employment litigation, including discrimination lawsuits; wrongful discharge; and wage and hour matters. Counseling companies on day-to-day employment issues is also an important part of Michael's practice. This includes advising employers on hiring, discipline, and termination decisions; on leave and disability issues; and on preparing and revising employee handbooks. By helping employers develop sound personnel policies, Michael assists many Colorado companies, large and small, in minimizing the risk of employment-related litigation.

2022 HFWA Paid Leave Q & A

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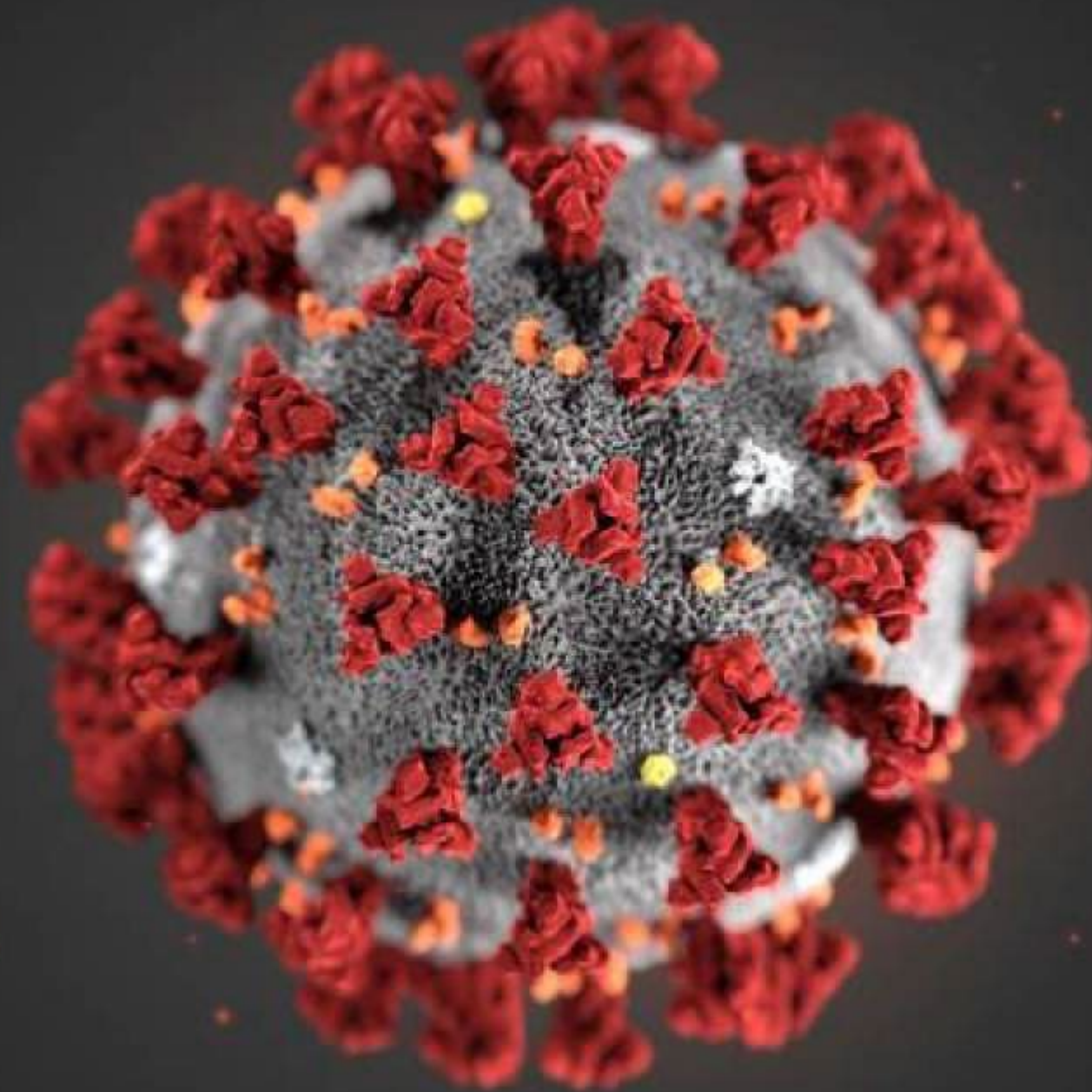
The logo for ASAP, featuring the letters "ASAP" in a bold, italicized, white sans-serif font. The text is set against a black background that is shaped like a parallelogram. A horizontal red line cuts across the middle of the logo.

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COVID-19 Vaccinations



CDC's Updated COVID Isolation & Quarantine Period for the General Population

- ▶ Isolation. If an employee tests positive for COVID (whether vaccinated or not):
 - ▶ Stay home for 5 days.
 - ▶ If the employee has no symptoms or the symptoms are resolving after 5 days, employee can return to work.
 - ▶ Employee should continue to wear a mask around others for 5 additional days.
 - ▶ If employee continues to have a fever, the employee should continue to stay home until the employee's fever resolves.

CDC's Updated COVID Isolation & Quarantine Period for the General Population

- ▶ Quarantine.
 - ▶ If the employee was exposed to someone with COVID and the employee has been boosted or completed the primary series of Pfizer or Moderna vaccine within the last 6 (six) months or completed the primary series of J&J vaccine within the last 2 months , the employee should wear a mask around others for 10 days and test on day 5, if possible and if the employee develops symptoms, the employee should stay home.
 - ▶ If the employee completed the primary series of Pfizer or Moderna vaccine over 6 months ago and are not boosted or completed the primary series of J&J over 2 months ago and are not boosted or are unvaccinated, the employee should stay home for 5 days. After that continue to wear a mask around others for 5 additional days.

OSHA Notification Tools

- ▶ OSHA requires that if the organization has been informed that a person who has been in the workplace is COVID-19 positive, the employer must, within 24 hours:
 - ▶ Notify each employee who has been in close contact with the COVID-19 positive person. Close contact means being within 6 feet of the person for a cumulative total of 15 minutes or more over a 24-hour period during that person's potential transmission period.
 - ▶ Notify all other employees who were not wearing a respirator and any other required PPE and worked in a well-defined portion of the workplace (e.g., a particular floor) in which the COVID-19 positive person was present during the potential transmission period.

OSHA Notification Tools

► Sample Email Notification to Employees:

Dear [Employee Name], We have been notified that an individual who was present in our workplace on [MM/DD/YYYY] has been diagnosed with COVID-19. We are separately notifying people who appear to have had close contact with the individual, but we want to alert everyone working in the same well-defined portion of the workplace to the possibility of exposure. If you experience symptoms of COVID-19, such as fever, chills, cough, difficulty breathing, new loss of taste or smell, or other symptoms, please contact [COVID-19 Safety Coordinator Name and Contact Information] and consider consulting with your healthcare provider about COVID-19 testing. As always, [Company Name] will protect all employee medical information. Sincerely, _____.

Federal Requirements

- ▶ On September 9, President Biden announced his Path Out of the Pandemic: COVID-19 Action Plan.
- ▶ The Path directed:
 - ▶ Executive departments and agencies, to ensure that covered contracts and contract-like instruments include a clause that the contractor and any subcontractors (at any tier) shall incorporate into lower-tier subcontracts regarding the requirement for employees to be immunized.
 - ▶ OSHA to develop Emergency Temporary Standards (“ETS”) to require employers with more than 100 employees to ensure that all covered employees become immunized.
 - ▶ And, over the next two months those standards and guidances were issued.

Immunization Requirements

- ▶ Previously, on August 30, 2021, the Colorado Department of Public Health and Environment adopted an emergency rule mandating that all employees, direct contractors, and support staff in licensed healthcare settings in Colorado receive their first dose of the COVID-19 vaccine by September 30, 2021, and be fully vaccinated no later than October 31.
- ▶ On September 24, 2021, the Safer Federal Workforce Task Force Guidance covering all employees of federal contractors and subcontractors was released.
- ▶ On November 5, 2021, the Occupational Safety and Health Administration issued the COVID-19 Vaccination and Testing Emergency Temporary Standard.
- ▶ Additionally, on this date (i.e., November 5, 2021), the Centers for Medicare and Medicaid Services issued its Interim Final Rule.

Litigation Update

- ▶ Immediately after OSHA published the ETS for private sector workers, multiple litigations were filed challenging the validity.
- ▶ For example, on November 6th, the 5th Circuit Court of Appeals, which covers Texas, Louisiana, and Mississippi issued an opinion staying the ETS pending briefing because it believed “that there are grave statutory and constitutional issues with the ETS.”
- ▶ On November 12th, the Fifth Circuit reaffirmed that ruling because it believed that OSHA had exceeded its statutory authority.
- ▶ As part of that ruling, the 5th Circuit stayed the ETS and issued a permanent injunction and ordered OSHA to take no steps to implement or enforce the ETS until further Court order.
- ▶ Other similar lawsuits – 34 of them -- were filed in every other U.S. Circuit Court.

Litigation Update

- ▶ Under federal law, when multiple lawsuits involving “one or more common questions of fact” are filed in separate courts, the petitions are consolidated and heard by one court chosen at random.
 - ▶ The rules call for selecting the court “from a drum containing an entry for each circuit wherein a constituent petition for review is pending.”
- ▶ The lottery took place and the winner was the 6th Circuit.
- ▶ The 6th Circuit Court of Appeals is known to lean conservative, with most of its judges appointed by Republican presidents
 - ▶ 11 appointed by President Trump and President Bush
 - ▶ 5 appointed by President Clinton and President Obama.

Litigation Update

- ▶ On December 15, the U.S. Court of Appeals for the Sixth Circuit denied initial en banc review by an 8-8 vote.
- ▶ Two days later, on December 17, a 3-judge panel of the Sixth Circuit dissolved the stay issued by the Fifth Circuit in a 2-to-1 ruling, allowing the ETS to go into effect.
- ▶ Another directive from the Centers for Medicare & Medicaid Services (CMS) requires COVID-19 vaccination for staff employed at Medicare- and Medicaid-certified providers and suppliers. State attorneys general challenged the health care rule in multiple lawsuits with different outcomes. The 5th U.S. Circuit Court of Appeals lifted a district court's order that had blocked the directive nationwide, but the requirement remains blocked in 25 states. The U.S. Department of Justice (DOJ) asked the Supreme Court to reinstate the rule nationwide.
- ▶ The Supreme Court issued an injunction on January 13th, regarding the OSHA ETS, but not the CMS one.

Litigation Update (Supreme Court Opinions)

- ▶ The Supreme Court issued an injunction on January 13th, regarding the OSHA ETS, but not the CMS one.
- ▶ This decision does not:
 - ▶ Mean that private employers can't require employees to wear masks, employees to be immunized, identify whether they've been vaccinated, or meet other safety requirements implemented by the organization.
 - ▶ Mean that organizations covered by the CDPHE don't need to comply with those requirements.



Colorado Paid Leave Requirements / Healthy Families and Workplaces (“HFWA”)

What leaves are out there?

- ▶ Colorado Healthy Families and Workplaces Act – Sick Leave (“HFWA Sick”): Currently for all employers; those with under 16 employees were covered on January 1, 2022.
- ▶ Colorado Healthy Families and Workplaces Act – Public Health Emergency Leave (“HFWA PHEL”): Covers all Colorado employers since January 1, 2021 (yes, last year).
- ▶ Family and Medical Leave Act – Covers employers with 50 or more employees.
- ▶ Americans with Disabilities Act / Colorado Antidiscrimination Act – Collectively, these Acts cover all Colorado employers.
- ▶ Families First Coronavirus Response Act: No longer required. Tax benefits under ARPA for employers that “voluntary” complied with **ALL** the provisions of the FFCRA ended on September 30, 2021.
- ▶ Colorado Paid Family and Medical Leave Insurance Act leave. Not applicable until 2023/2024.
- ▶ Other leaves voluntarily provided by an employer: For example, PTO, vacation, bereavement, holiday leave, birthday leaves, annual leave, etc.

Colorado Healthy Families & Workplaces Act (“HFWA”)

- ▶ In June / July 2020, the Colorado legislature passed the Healthy Families Workplaces Act (“HFWA”).
- ▶ A CDLE Interpretive Notice stated that HFWA does not “continue” FFCRA Leave.
- ▶ Starting **January 1, 2021**, employers with 16 or more employees (other employers started **January 1, 2022**) must provide employees with paid sick leave to be used for:

HFWA After 2020

NEW PAID SICK LEAVE

- ▶ 1. Employees' mental or physical illnesses, need for diagnosis or treatment, or preventative care;
- ▶ 2. An employee is caring for sick family members (defined as a person who is related by blood, marriage, civil union, or adoption; a child to whom the employee stands in loco parentis or a person who stood in loco parentis to the employee when the employee was a minor; or a person for whom the employee is responsible for providing or arranging health-or safety-related care) requiring diagnosis, treatment, or preventative care;

HFWA After 2020

NEW PAID SICK LEAVE

- ▶ 3. An employee is the victim of domestic violence, harassment, or sexual abuse or needs to assist family members who are victims of such conduct, and seek medical attention or counseling relating to such abuse; or
- ▶ 4. In instances where a public health official has ordered the closure of the employee's place of business or the employee's child's school or place of care due to a public health emergency and the employee must therefore provide care to the child.

What Must Employers Provide?

- ▶ Beginning on the date of hire (or the applicable effective date of the Act, whichever is later), **all employees** (e.g., full-time, part-time, prn, casual, temporary, etc.) accrue one hour of paid sick leave for every 30 hours **worked**, up to 48 hours, or six eight-hour workdays of accrued time.
- ▶ Employers alternatively may elect to front-load the full annual allotment of paid sick leave to an employee at date of hire and at the beginning of each year.
- ▶ Employees can roll over unused paid sick time; though employers can limit use of leave to 48 hours in any given year.

Colorado HFWA Sick Leave Updates

- ▶ INFO #6B: Paid Sick Leave under HFWA.
 - ▶ Employers can limit usage at 48 hours of sick leave per year and can limit accrual at 48 hours in total.
 - ▶ So, for example, in which we ignore HFWA PHEL, let's say Hypothetical Employee Bob accrues 48 hours of HFWA Sick Leave by September 2021. In late December 2021, Bob uses 10 hours of HFWA Sick Leave, which is what he ends the year at.
 - ▶ How much HFWA sick leave can Bob carry into 2022?
 - ▶ How much leave can Bob accrue if he doesn't use any in 2022?
 - ▶ What if he uses some leave?
 - ▶ Is there a maximum that Bob can accrue?

Colorado HFWA

Sick Leave Updates

- ▶ According to the Division, the key provision is CRS § 8-13.3-403(3b). This states, "Up to forty-eight hours of paid sick leave that an employee accrues in a year but does not use carries forward to, and may be used in, a subsequent year; except that an employer is not required to allow the employee to use more than forty-eight hours of paid sick leave in a year."
- ▶ The Division also claims that its INFO #6B provides the same conclusion: "Any unused accrued leave, up to 48 hours per benefit year, carries forward for use in a later year, but an employer need not allow use or accrual of over 48 hours in any one benefit year."
- ▶ But that same INFO #6B states, that "One hour of paid leave for every 30 hours worked, up to 48 hours per year, is what employees must receive, starting their first day of work, unless an employer offers more."

How are hours accrued?

Interpretive Notice #6B

- ▶ **Non-exempt employees:** One hour of paid leave for every 30 hours worked up to 48 hours per year, is what employees must receive, starting their first day of work, unless an employer offers more. (C.R.S. 8-13.3-403.)
- ▶ **Exempt employees:** Overtime-exempt employees accrue leave as if they work 40 hours weekly, even if they work more – but non-exempt employees accrue paid leave equally for all hours worked, overtime or not.

HFWA – “A rose by any other name....”

- ▶ From CDLE Interpretive Notice #6B: HFWA does not require additional leave if an employer policy provides paid time off, often called a ‘PTO’ policy, for both HFWA and non-HFWA purposes (e.g., sick time and vacation) and states, in writing, that:
 - ▶ its leave policy provides PTO --
 - ▶ in at least an amount of hours and with pay sufficient to satisfy HFWA and applicable rules;
 - ▶ for all the same purposes covered by HFWA and applicable rules, not a narrower set of purposes; and
 - ▶ under all the same conditions as in HFWA and applicable rules, (e.g., accrual, use, payment, annual carryover of unused accrued leave, notice and documentation requirements, and anti-retaliation and anti-interference rights); and
 - ▶ additional HFWA leave need not be provided if employees use all their PTO for non-HFWA reasons (e.g., vacation), except during a “public health emergency,” an employer must still provide supplemental leave.

What Must Employers Provide?

- ▶ An employee may be required to use paid sick leave in hourly increments unless the employer specifically allows paid sick leave to be taken in smaller increments of time.
- ▶ If an employee uses paid sick leave for four or more consecutive workdays, the employer may require “reasonable documentation” that the paid sick leave is for a purpose that is authorized by the Act.

Revisions to Wage Protection Rules

- ▶ Properly paying HFWA Leave:
 - ▶ **Indeterminate shifts.** If an employee uses paid leave for a shift of indeterminate length (for example, a shift that is defined by business needs rather than a previously specified number of hours), an employer may determine the number of paid leave hours used by the employee based on the number of hours actually worked by a replacement employee in the same shift. If there is no replacement employee for the indeterminate shift, an employer may determine the number of paid leave hours used by the employee based on the number of hours actually worked by the employee for their most similar shift in the past

Revisions to Wage Protection Rules

- ▶ **On-call employees** are entitled to use paid leave during any hours they have been scheduled to work, including hours among the employee's on-call time that the employer actually requests the employee to work, or any other hours that would qualify as "time worked" as defined by Rule 1.9 of the COMPS Order, 7 CCR 1103-1. Otherwise, b. Being "scheduled to work" does not include shifts for which an employee has been asked to be available or on-call, unless the employee is performing work, including any "time worked" as defined by COMPS Order, 7 CCR 1103-1, Rule 1.9. However, if an on-call employee has an agreement with an employer to be paid for a scheduled shift regardless of whether the employee actually works the shift, the employer must provide paid leave to a qualifying employee for that shift.

Any Other Requirements?

Yes!!!

- ▶ An employer is not required to pay out unused, accrued paid sick leave upon termination, resignation, retirement, or other separation from employment.
 - ▶ Well, unless that's required under the Handbook policy.
 - ▶ For example, does the organization's PTO policy state that the employer pays it out upon termination?

Revisions to Wage Protection Rules re PTO Payout

- ▶ In Wage Protection Rule 2.17, the CDLE defined “vacation leave” as:

Pay for leave, regardless of its label, that is usable at the employee’s discretion (other than procedural requirements such as notice and approval of particular dates), rather than leave usable only upon occurrence of a qualifying event (for example, a medical need, caretaking requirement, bereavement, or holiday).

- ▶ Under this, PTO policies that have an element of leave that is at the employee’s discretion, like traditional vacation leave policies, are now also subject to full pay upon termination; just like vacation policies.
- ▶ So, does that mean employers need to pay out PTO leave if it identifies it also includes Colorado Healthy Families Act Leave, which is specifically not paid upon termination?

Any Other Requirements?

Yes!!!

- ▶ If an employee separates from employment and is rehired by the same employer within six months after the separation, the employer shall reinstate any paid sick leave that the employee had accrued but not used during the employee's previous employment with the employer and that had not been converted to monetary compensation to the employee at the time of separation from employment.

Public Emergency Leave under HFWA

- ▶ The Act also contains provisions relating to public health emergencies, which will require employers to supplement employees' otherwise available paid sick leave such that employees may take up to an additional two weeks (i.e., up to 80 hours) of paid sick leave during a public health emergency.
- ▶ According to the CDLE's Info #6C: "Employers with fewer than 16 employees must still provide 80-hour COVID leave, despite not having to provide 48-hour general paid leave until 2022."

Are we currently under a declaration of a Public Emergency?

- ▶ At the beginning of the COVID-19 pandemic, the federal government declared a public health emergency.
- ▶ In July 2021, Governor Polis did not extend Colorado's Public Emergency.
- ▶ Last week, the federal Department of Health and Human Services extended the public emergency through April 2022.
- ▶ Employers must provide PHEL for 30 days after the expiration of the public emergency. So, right now, that makes the leave available through May 2022.

Public Emergency Leave under HFWA

- ▶ This declaration means that all employers shall supplement each employee's accrued paid sick leave balance as necessary to ensure that an employee may have available to him/her the following amounts of Public Health Emergency Paid Leave for the purposes specified above:
 - ▶ For employees who normally work 40 or more hours in a week: 80 hours maximum available for use.
 - ▶ For employees who normally work less than 40 hours in a week: At least the amount of time an employee is scheduled to work in a 14-day period, maximum, or the amount of time the employee actually works on average in a 14-day period, maximum, whichever calculation is greater, available for use.

Public Emergency Leave under HFWA

- ▶ The law states that employers may count an employee's accrued but unused time under the Act's general paid sick leave provisions toward this supplemental public health emergency sick leave requirement.
- ▶ In the CDLE's Interpretive Notice and Formal Opinion, #6B, it identified that "...during a public health emergency (PHE), employers must immediately provide each employee additional paid leave -- supplementing whatever HFWA leave the employee accrued before the PHE with enough supplemental leave to assure the employee can take leave in the [amounts identified.]"

Public Emergency Leave under HFWA

- ▶ Public Health Emergency means:
 - ▶ An act of bioterrorism, a pandemic influenza, or an epidemic caused by a novel and highly fatal infectious agent, for which:
 - ▶ An emergency is declared by a federal, state, or local public health agency or
 - ▶ A disaster emergency is declared by the Governor or
 - ▶ A highly infectious illness or agent with epidemic or pandemic potential for which a disaster emergency is declared by the Governor.

Public Emergency Leave under HFWA

- ▶ The supplemental leave will be available until four(4) weeks after the official termination or suspension of the public health emergency and may be used by employees:
 - ▶ Self-isolating due to a positive diagnosis, experiencing symptoms, seeking medical treatment or preventative care with respect to the illness causing the public health emergency;
 - ▶ Suffering from a preexisting condition that would make the employee more susceptible to serious harm if infected with the illness causing the public health emergency;

Public Emergency Leave under HFWA

- ▶ Where public health officials or the employer have deemed it to be unsafe for the employee to come to work due the employee's exposure to, or displaying symptoms of, the illness causing the public health emergency; or
- ▶ If caring for a family member in the above circumstances, or if they must care for a child or other family member whose school or child-care facility is closed due to the public health emergency.
- ▶ Unlike the use of paid sick leave for the general reasons discussed above, an employer may not require an employee to provide documentation in order to take supplemental paid sick leave under the public health emergency provisions of the Act.

Family Member

- ▶ “Family member” means:
 - ▶ A person related by blood, marriage, civil union, or adoption;
 - ▶ A child to whom the employee stands in loco parentis or a person who stood in loco parentis to the employee when the employee was a minor; or
 - ▶ A person for whom the employee is responsible for providing or arranging health or safety related care.

Public Emergency Leave under HFWA

- ▶ Employees retain their accrued leave rights during a public health emergency.
- ▶ They also continue earning accrued leave at their regulation rate, up to 48 hours per year.
- ▶ And they may use supplemental leave for any of the qualifying reasons before using accrued leave, if the reason for leave would qualify as both.
- ▶ Usage order for leave covered by HFWA PHEL: (1) HFWA PHEL; (2) HFWA Sick; and (3) other paid leaves.

Any Other Requirements?

Yes!!!

- ▶ Unlike the use of paid sick leave for the general reasons discussed above, an employer may not require an employee to provide documentation in order to take supplemental paid sick leave under the public health emergency provisions of the Act.
- ▶ But recently, the CDLE identified in INFO #6B: “For public health emergency leave, an employer can require return-to-work documentation, if it has a good-faith basis to believe the employee was exposed to a contagious disease that may persist past the leave. Absent that good-faith basis, disallowing a return without documentation may be an unlawful denial of the right to take leave (which includes a right to return) and/or interference with leave rights.

Any Other Requirements?

Yes!!!

- ▶ Employees must give notices “as soon as practicable.” But that notice is only when employee needs leave that is foreseeable, such as for a scheduled appointment.
- ▶ An employer may develop a “reasonable procedures” requiring notice for “foreseeable” leave but shall not deny paid sick leave to the employee based on the employee’s noncompliance with such a policy.

“Carry-Over” of Leave

- ▶ Any unused accrued leave, up to 48 hours per benefit year, carries forward for use in a later year – but an employer is not required to allow use of more than 48 hours in any one year.
- ▶ No paid leave is required if an entire business is “completely closed.”
- ▶ Employees may request, and employers must provide in writing or electronically, documents showing the then-current amount of paid leave the employee has (1) available for use and (2) already used during that benefit year (both for sick leave and for public emergency leave). Employees may not request such information more than once per month, unless the need for leave arises.

HFWA Notice Requirement

- ▶ Notice Requirement:
 - ▶ Employer must (1) supply each employee with written notice, and (2) display the CDLE poster.
 - ▶ The Division will create and make available posters and notices (in English and other languages) that employers may use.
- ▶ Written notice must:
 - ▶ Specify the amount of paid sick leave to which employees are entitled and the terms of its use.
 - ▶ Notify employees that (1) employers cannot retaliate against an employee for requesting or using paid sick leave, and (2) an employee has the right to file a complaint or bring civil action if paid sick leave is denied or the employer retaliates.

Any Other Requirements?

Yes!!!

- ▶ Written notice must:
 - ▶ Specify the amount of paid sick leave to which employees are entitled and the terms of its use under Part 4
 - ▶ Notify employees that (1) employers cannot retaliate against an employee for requesting or using paid sick leave, and (2) an employee has the right to file a complaint or bring civil action if paid sick leave is denied or the employer retaliates

Is there individual liability under HFWA and the CWA?

- ▶ Yes.
- ▶ As the CDLE recently explained in Interpretive Notice, #11A, an employee working as a mechanic at “Smith’s Auto Body” could bring a wage claim simultaneously against both the business and an individual who manages the business for violating these two Acts.
- ▶ And if a person is individually liable, their personally-held assets – personal bank accounts, personal or real property, etc. – can be seized or garnished to satisfy the liability, and any judgment remaining unpaid can be reported to credit reporting agencies.

HFWA Summary

- ▶ Colorado Healthy Families and Workplaces Act – Sick Leave: Started on January 1, 2021, for employers with 16 or more employees; others started on January 1, 2022. Requirements:
 - ▶ Accrual of 1 hour of leave for every 30 hours worked or provide employees 48 hours on a date certain (e.g., first day of employment; 1st of every year).
 - ▶ Every employee.
 - ▶ From first date of employment.
 - ▶ Employers can cap leave used and maximum accrued at 48 hours total (not just for the year).
- ▶ Colorado Healthy Families and Workplaces Act – Public Health Emergency Leave: Covers all Colorado employers since January 1, 2021.
 - ▶ Provides all Colorado employees two (2) weeks of paid leave for certain reasons.



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