

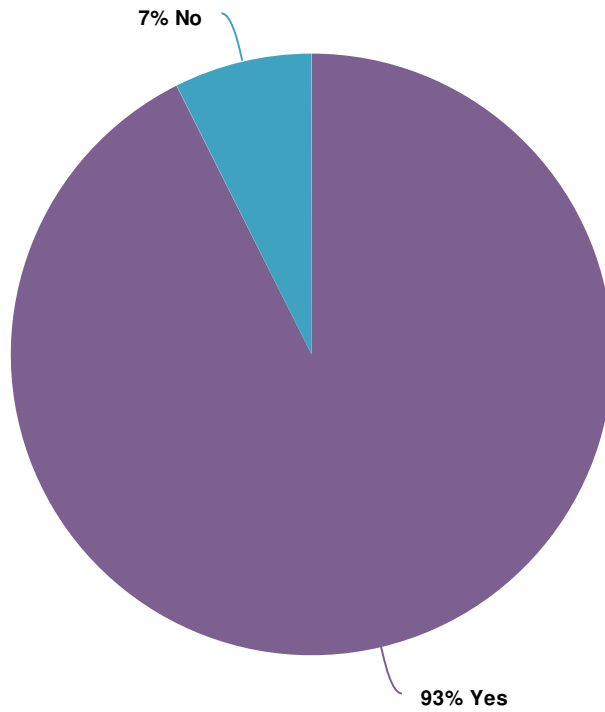
Report for URGENT: Survey on State and Local Paid Leave Laws

Response Counts



Totals: 86

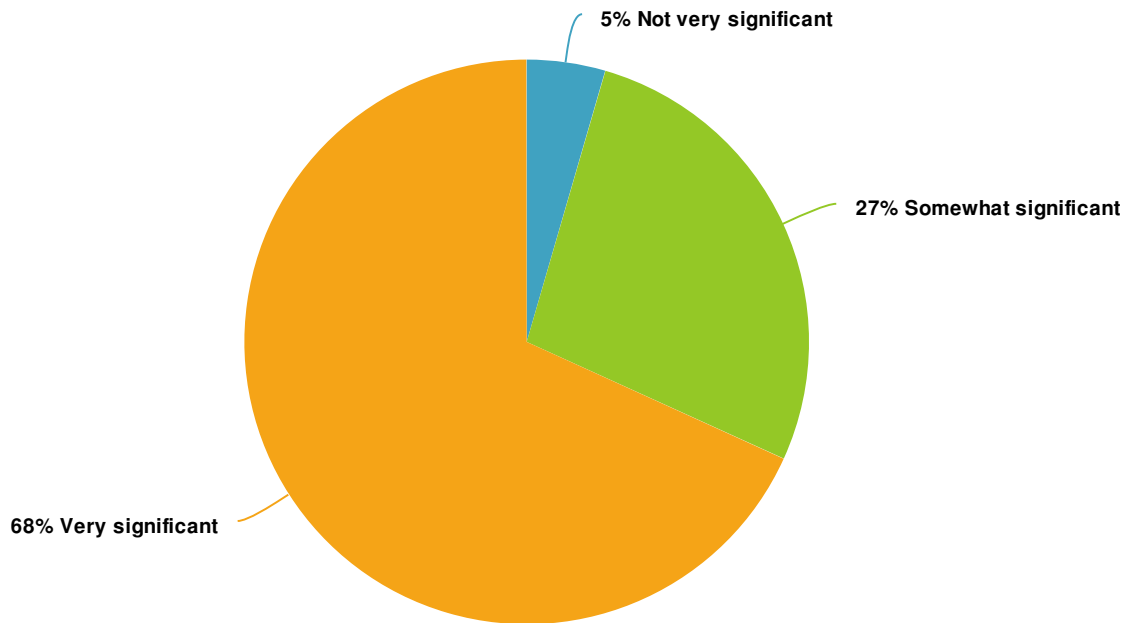
1. Does your organization currently offer a paid leave program for its employees that is subject to multiple state/local paid leave ordinances?


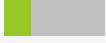



Value		Percent	Responses
Yes		92.6%	75
No		7.4%	6

Totals: 81

2. How would you characterize the administrative burden imposed by multiple state/local laws?



Value		Percent	Responses
Not very significant		4.5%	3
Somewhat significant		27.3%	18
Very significant		68.2%	45

Totals: 66

3. How would you characterize the administrative burden imposed by multiple state/local laws? - comments



ResponseID	Response
	Need to hire an expert to keep current with the many, ever-changing regulations.
	This skews the cost of labor in various market and with the need for skilled labor, there are markets where we may not be competitive due to these laws, yet major clients request our construction services in those markets. It is very difficult to operate a business in these circumstances.
	We constantly track local laws, then have to decide whether we can change our paid leave policy across the U.S. to take into account a new local law, or make an exception that has to be tracked and administered separately for a particular location.
	It takes time and money to understand all of the various disparate laws even though our underlying programs are in and of themselves usually compliant and more generous than required. Additionally in some cases we have to provide annual certifications - more time and money
	Companies with national footprints cannot offer just one program due to the different program designs, accrual rates, accrual start dates and availability of use.
	We have employees in WA State. The State shares very little information and it is difficult to reach a representative by phone. Coordinating the company-paid benefits with the State disability program is extremely challenging.

ResponseID Response

It is confusing to employees who may work in one state and live in another, plus they do not go on leave all that often, so we have to answer MANY questions internally, even though we have an external vendor. Leaves can be such a delicate/traumatic time in an employee's life, so they want to make sure that they have ALL of the answers.

We offset our 16 weeks paid leave for parents by whatever they get from the state. as more and more states add paid leave, much harder

This is exacerbated by employees not understanding how state/local laws integrate, or not, with company paid leaves.

We currently comply with about 60 different state and local laws. Each that comes out requires detailed legal review to ensure all nuances are known and then a new plan is created if needed.

It is a challenge to stay abreast of the increasingly complex legislative landscape and then adapt systems and processes. Even vendors do not have capability to stay abreast of changing local leave landscape.

Notices, administration and reporting are all over the board, requiring multiple reviews and processes, oftentimes manual, at multiple levels. Even outsourced LOA administrators are having a hard time keeping up or just plain won't offer the services to cover the state/local mandates.

You have to ensure notifying employees, updating policies, updating HRIS systems to reflect the multiple leave types, as well as completing claim forms for each state. Also, if the employees are covered by a CBA, there are additional considerations to make.

It is incredibly difficult to coordinate the everchanging state and local ordinances that are being pass.

We try to have employees complete the state on their own as the state requests what employer does. CA is issue.

It's difficult to keep up with all of the various leave, there is no consistency (varying benefits, eligibility, job protection, coordination with company leaves, etc.)

We offer paid benefits that top up any mandated benefits because we want to ensure all employees are able to take the same amount of time off. When offsetting benefits come from a State, that means employees file twice (with their employer and with the State) which means they have a worse experience to get the same pay vs people in States with no State benefits (even though in some cases employees are actually paying taxes to support those State benefits).

ResponseID Response

We currently set up leave based on each state and local laws so the HR system takes time to set up and with being a global company it is very difficult for managers to understand what is allowed for their employees based on where they work.

managing each state that offers a program, determining to use a private plan, admin burdens, different comp definitions, requesting exemptions by state, rules, eligibility, billing, reporting, leave reasons, etc., makes it very difficult to manage and required multiple people to coordinate.

It is difficult to keep abreast of the different state/local laws much less have a technical system both HRIS and Payroll to enact the individual mandates. We also cover U.S. territories.

Management of Policies, reference materials, and training of location HR staff

We are in 32 states and when this is not a uniform across all states, it leads to confusion for employees and difficulties for the organization in communicating changes

The patchwork of state based plans and the variation in employee & employer contributions along with the different definitions of family member and eligibility criteria make it difficult to design an employer plan for our employees that would meet state requirements for exemption. In addition the different employee notice requirements and the roll out strategy for each state makes the monitoring administratively difficult.

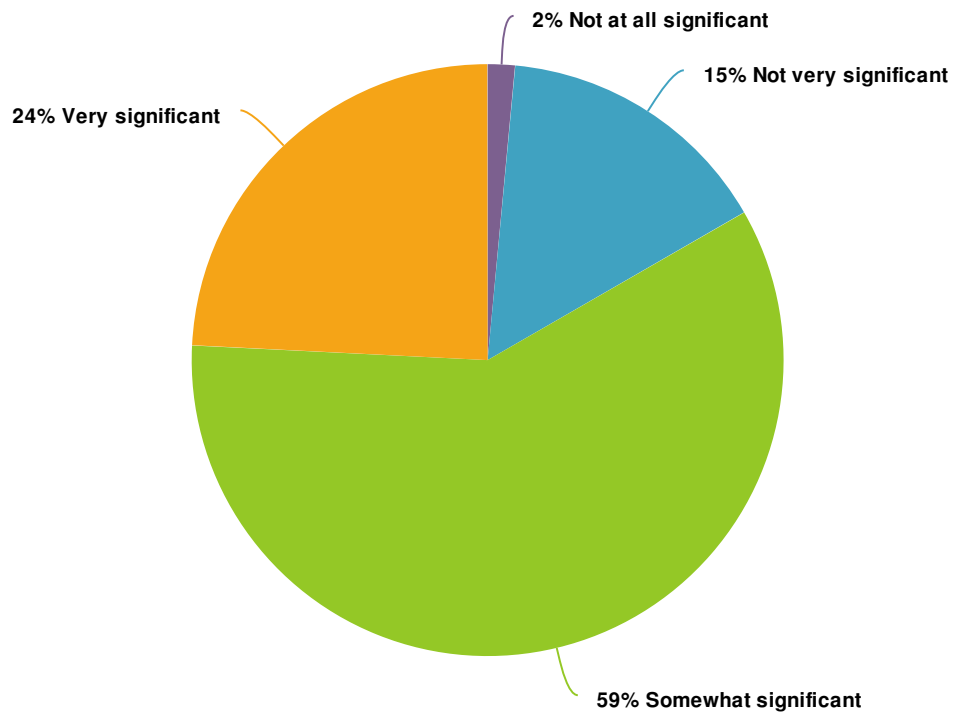
As a large company, we have to modify tools and processes, and much of it becomes manual. Since the WA PFML was put in place, we are still struggling with appropriate tool set up to ensure appropriate pay, and compliance, not to mention employee confusion. Some employees know that other employees get a better benefit depending on the state they reside.


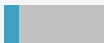


It's difficult and expensive to program our eHR system every time a new ordinance is passed. In addition, then we have to update SPDs, websites, brochures, etc. to document the exceptions and identify and communicate to any impacted individuals. It also can make it unfair for someone living in one locale vs. another.

We have to have different manual and system enhancements to administer

There is no consistency state-to-state. The imposition of state-by-state COVID related leaves compounds this complexity.

4. How would you characterize the economic cost of complying with multiple state/local laws?



Value		Percent	Responses
Not at all significant		1.5%	1
Not very significant		15.2%	10
Somewhat significant		59.1%	39
Very significant		24.2%	16

Totals: 66

5. How would you characterize the economic cost of complying with multiple state/local laws? - comments



ResponseID Response

1/2 FTE to track local laws and administrative rules and additional cost (FTE time, software changes, employee education) to change paid time administration.

We have had to give out more time off to new hires in order to meet the arbitrary requirements that sound good to someone who does not run these programs. In addition, these rules require sick pay to be earned and available to be used during the training periods for new employees. Time off during training disrupts the training and we cannot allow time off during these weeks of training.

We completely revised our parental leave program so that it would be in compliance with state laws, increasing the number of weeks from four to fourteen. These additional 10 weeks create additional expenses by the business to staff appropriately.

Adds additional criteria as we look at vendor partners, which adds cost. Also, becomes additional responsibility for which we had to dedicate internal resources to support.

Notices, administration and reporting are all over the board, requiring multiple reviews and processes, oftentimes manual, at multiple levels. Even outsourced LOA administrators are having a hard time keeping up or just plain won't offer the services to cover the state/local mandates.

We provide leave for employees already, so adding in the state/local paid leave can result in overpayment.

ResponseID Response

The cost is not only the paid time off but the looming penalties for non-compliance.

requires additional staff, reporting, contribution (NY) and system support

The economic cost is important but candidly the administrative cost is our bigger concern. States are enacting laws with the right intentions but the outcome is that many employees are not necessarily getting a better benefit or experience.

our leave provider helps support these leaves and the complexities add to the expense of program admin

Technical systems are not currently programmed to handle multiple state laws with various nuances attached to the laws by state/city.

Maintain different programs, legal reviews, vendors system changes

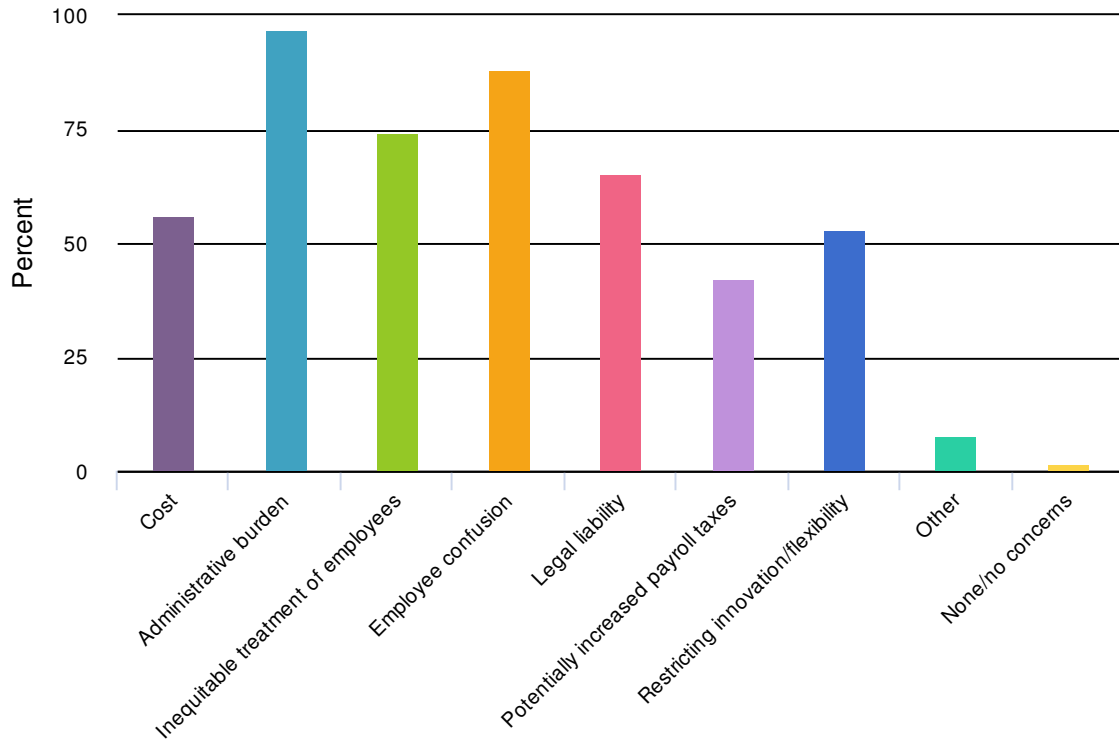
The administrative burden means more request for headcount, \$\$ for updating existing tools, etc.

Luckily, we're in one state, but we have several city and county ordinances that vary. So yes, it's expensive to reprogram our systems, update all of our documentation, and then communicate with impacted individuals. We have about 10,000 ees, so we also have to be careful when an employee calls in to make sure we're providing the right information to him based on where he works.

We have been able to handle the present laws in a cost efficient manner as the are smaller employee populations but our cost would be significant if a new law covers more than just a few hundred employees.

Fortunately, most of our time off policies comply with the laws, but some tweaks might need to be made to satisfy specific nuances (ex: new hires in Q4 would not receive a vacation quota until Q1 so tweaks to the policy will need to be made)

6. What are your organization's concerns about the growing number of state/local laws? (Please select all that apply.)



Value	Percent	Responses
Cost	56.1%	37
Administrative burden	97.0%	64
Inequitable treatment of employees	74.2%	49
Employee confusion	87.9%	58
Legal liability	65.2%	43
Potentially increased payroll taxes	42.4%	28
Restricting innovation/flexibility	53.0%	35
Other	7.6%	5
None/no concerns	1.5%	1

Other	Count
Administrative confusion, unclear laws	1
Increased mobility of our workforce.	1
Making sure we are aware of all of the laws, communicating them to employees, setting them up in our system	1
eliminates the value of the above market benefits offered by our company in favor of time off plans designed in the 1950's.	1
internal resources focused on delivering benefits that apply to a narrow population, detracts from solutions that would benefit the broader population	1
Totals	5