



Coronavirus Update on Families First Coronavirus Response Act (FFCRA)

We hope this information is helpful to you and we will continue to provide important information to all of you, as soon as we receive it. As always, please reach out to us with any questions you may have.

The Department of Labor (DOL) just published its first round of guidance on the FFCRA, including two fact sheets and a FAQ: [Fact Sheet for Employees](#), a [Fact Sheet for Employers](#) and a [Questions and Answers](#) document (these are included with this communication for your convenience). Note that the DOL states the paid leave provisions of the FFCRA will be effective on April 1, 2020. Covered topics include how an employer must count the number of their employees to determine coverage; how to count hours for part-time employees; and how to calculate the wages employees are entitled to under this law.

Please note there is a small business exemption if providing child care-related paid sick leave and expanded family and medical leave at your business with fewer than 50 employees would jeopardize the viability of your business as a going concern. To elect this small business exemption, you should document why your business with fewer than 50 employees meets the criteria set forth by the Department, which will be addressed in more detail in forthcoming regulations. These regulations are expected in April 2020 per the Department of Labor which is subsequent to the effective date of the law.

It is also possible that the DOL will exempt all employers with less than 50 employees per commentary from the US Chamber of Commerce.

The requires each covered employer to post in a conspicuous place on its premises a notice of FFCRA requirements. Such a notice is attached.

We will update you as we learn about new guidance regarding this Act and other pertinent Coronavirus information for you, your family and your business.