



The HR WIRE

ETC HR Employer Compliance News II *Making Compliance Connections*

March 2025

SECTION I: Notices, Reminders & Alerts & SECTION II: Noteworthy Compliance Happenings

Workplace Labor Notice Updates & New Releases

IL - Illinois issued an updated [Victim's Economic Security and Safety Act \(VESSA\) Notice](#), featuring several key changes. The Notice and Certification section has been revised with clarified language, and new details have been added regarding eligibility for employees who have worked certain hours in the past 12 months. Additionally, a Complaints section has been introduced, including a contact phone number, and the Confidentiality section has been revised. Double check to ensure your Labor Notices include this updated version or replace with the updated Notice.

MI - Reminder State's [Earned Sick Time Notice](#) to be distributed to MI employees by March 23.

MO - Reminder State's [Earned Sick Time Notice](#) to be posted/distributed by April 15

Reminders & Alerts

Reminder: OSHA Form 300A Accidents & Summary Posting Obligations

Applicable employers must post OSHA Form 300A Accident Summary in a public area annually from [February 1 through April 30](#) for previous year's accidents. More details schedule to be released through reminder e-blast reminders.

Reminder: Benefit Plans Starting February 1-

Employer's CMS Part D Creditable Coverage Online Disclosure – April 1, 2025

Alert! RxDC Reporting Carrier Deadlines Ahead of June 1, 2025 Filing Deadline

Group health plans and health insurance issuers must annually submit detailed information on prescription drug and health care spending to the Centers for Medicare & Medicaid Services (CMS). This reporting is referred to as the "prescription drug data collection" (or "RxDC report"). The next RxDC report is due by [Sunday, June 1, 2025](#), covering data for [2024](#).

The RxDC report is comprised of several files, including those that require specific plan-level information, such as plan year beginning and end dates and enrollment and premium data. It also includes files that require detailed information about medical and pharmacy benefits.

Most employers contract with third parties, such as issuers, third-party administrators (TPAs) and pharmacy benefit managers (PBMs), to submit RxDC reports on behalf of their health plans. Employers may work with multiple third parties to complete the RxDC report for their health plans. For example, a self-insured employer may use both its TPA and PBM to submit different portions of the RxDC report. A health plan's submission is considered complete if CMS receives all required files, regardless of who submits them.



Resources:

- RxDC reporting [webpage](#) (with links to reporting resources)
- [Frequently Asked Questions](#)
- [Reporting instructions](#) (updated January 2025, no changes from last year)
- [User Manual](#) for submitting RxDC reports

Employer Takeaway: Employers should start reaching out to their issuers, TPAs or PBMs, as applicable, to confirm that they will submit the RxDC files for their health plans by June 1, 2025. Employers should also confirm that their written agreements with any third party support services addresses this reporting responsibility. If you find that you need assistance, ETC may be able to provide you with guidance, tools and even execute the filing of the P2 & D1 Rx DC related reporting. Reach out to us at HR_Help@etctracking should you wish to explore how ETC may be able to assist you.

Status Update: President Trump & DEI Executive Orders

On March 14, 2025, the U.S. Court of Appeals for the 4th Circuit [stayed](#) a nationwide preliminary injunction that temporarily blocked certain provisions of Executive Orders (EO) [14151](#) and [14173](#) issued by President Donald Trump on Jan. 20, 2025, and Jan. 21, 2025, respectively. To recap, these EOs aim to combat “illegal diversity, equity and inclusion (DEI) programs” in the federal and private sectors.

With the March 14, 2025, ruling, the 4th Circuit granted the government’s request to stay the nationwide preliminary injunction. Therefore, the Trump administration **may continue** to enforce the previously blocked provisions of the EOs, including the Termination and Certification Provisions for government contractors, employers, while the court considers the merits of the case.

Employer Takeaways:

- Prepare for uncertainty as the case is still pending, and such provisions may yet be blocked in a final ruling on the merits.
- Keep in mind that neither the initial EOs nor the 4th Circuit ruling **alter employers’ legal obligations, as employers are still prohibited from considering an individual’s protected trait** (e.g., race, color, sex, religion, age or national origin) in employment decisions.
- Employers may consider reviewing existing DEI practices to ensure they do not discriminate on the basis of a federally protected trait.

Guidance: EEOC and DOJ Issue Guidance on DEI-related Discrimination

Reminder:

- The federal district court for the district of Maryland on March 10, 2025, clarified its Feb. 21 preliminary injunction against Trump Administration enforcement of aspects of its executive orders (EOs) that ban “illegal” diversity, equity, and inclusion (DEI) programs applies across **government** - federal executive branch agencies, departments, commissions, and their heads, officers, agents, and subdivisions. *National Association of Diversity Officers in Higher Education et al. v. Trump et al.*, No. 1:25-cv-00333 (D. Md.).
- Employers should continue assessing their DEI programming.

On March 19, 2025, the U.S. Equal Employment Opportunity Commission (EEOC) and the U.S. Department of Justice (DOJ) issued joint [guidance](#) on illegal and discriminatory diversity, equity and inclusion (DEI) practices.

The EEOC FAQs and the EEOC and DOJ joint guidance state that **DEI programs may be unlawful under Title VII if they are motivated, in whole or in part, by an employee’s protected trait.**

The guidance identifies specific instances of potential DEI-related discrimination in the workplace, including:



- **Disparate treatment** in employment actions (e.g., hiring; firing; compensation; access to training, mentoring or workplace networking; and selection for interviews, including inclusion in a candidate pool) that is motivated by a protected trait;
- **Limiting, segregating or classifying** employees based on a protected trait in a way that deprives them of employment opportunities (e.g., limiting membership in workplace groups, such as employee resource groups or affinity groups, to members of a particular protected class);
- Engaging in workplace **harassment** based on a protected trait (e.g., DEI training may constitute illegal harassment if it is so severe or frequent as to be intimidating, hostile or abusive); and
- **Retaliating** against employees who engage in protected activity (e.g., objecting to DEI-related discrimination, participating in an investigation or filing a charge).

Additionally, employers may **not** justify taking **an employment action on the basis of a protected trait because they have a business interest in diversity, including a client or customer preference.**

Documents released by the joint efforts include guidance aimed at educating Employees:

- [What To Do If You Experience Discrimination Related to DEI at Work](#)
- [What You Should Know About DEI-Related Discrimination at Work](#)

Update: Acting National Labor Relations Board General Counsel Rescinds Biden-Era Memoranda

- The National Labor Relations Board's (Board) new general counsel, William B. Cowen, rescinded several guidance memos from his predecessor.
- The rescinding of these guidance memos is a strong indication of the Board's new enforcement priorities and interpretations of the National Labor Relations Act.

Under the new Trump Administration, there has been a number of recent developments at the National Labor Relations Board (Board) affecting employers. In particular, the Board's new general counsel (GC), William B. Cowen, has issued rescission memoranda that have pulled back much of the guidance issued by previous GC Jennifer Abruzzo. These GC memos are nonbinding guidance from the Board that informs employers, unions and workers about how Cowen plans to deal with novel or controversial issues.

Interested in learning or reading more. Access a recent March 19th article released by Holland & Knight [HERE](#)

Update: Corporate Transparency Act – Enforcement Paused

- On Feb. 27, 2025, FinCEN [announced](#) that it would **not enforce** the CTA reporting requirements and would issue an interim final rule in the coming weeks.
- On March 2, 2025, the Department of the Treasury issued an additional [announcement](#) that it would **not enforce** penalties under the CTA.
- This, even though on February 18, a federal court reinstated the [Corporate Transparency Act's](#) (CTA) reporting requirements, and the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) [extended](#) the CTA reporting deadline for most entities.

Employer Takeaways:

- While the CTA reporting requirements are **not currently enforced**, the CTA and its implementing regulations remain in effect and FinCEN is still accepting BOI reports.
- Employers should anticipate significant uncertainty and monitor for updates from the government and pursuant to ongoing legal challenges. ETC will continue to provide updates as released



New for Federal Contractors: Federal Contractor Minimum Wage Executive Order Revoked

After years of costly litigation surrounding executive orders establishing a minimum wage for federal contractors, on March 14, 2025, President Trump signed an executive order revoking Executive Order (EO) 14026 issued by former President Biden on April 27, 2021 (Increasing the Minimum Wage for Federal Contractors). EO 14026 set the minimum wage for workers on covered federal contracts, entered into on or after the date, to \$15.00 per hours. That minimum wage has since increased to \$17.75.

Now that the higher minimum wage for federal contractors no longer applies, the question remains: What is the current minimum wage for workers performing work on federal contracts previously covered by EO 14026?

President Obama issued EO 13658 on February 12, 2014 (Establishing a Minimum Wage for Federal Contractors), which set a minimum wage of \$10.10 for contracts and subcontracts entered into or modified on or after January 1, 2015, involving construction covered by the Davis-Bacon Act, services covered by the Service Contract Act, concessions or connected with federal property or lands, and related to services offered for federal employees, their dependents, or the general public. The minimum wage under EO 13658 has since increased to \$13.30 per hour (with a lower rate of \$9.30 for tipped employees). With the elimination of the increased minimum wage for the same contracts established by EO 14026, the current federal minimum wage for workers performing services on covered federal contracts and subcontracts entered into on or after January 30, 2022 (the effective date of the increases under EO 14026) may now be \$13.30 (the Obama-established rate). Alternatively, because EO 14026 superseded EO 13658 as of January 30, 2022, the standard federal minimum wage of \$7.25 per hour may apply to such contracts.

Further guidance from the Department of Labor is expected. At present, **if you are paying workers on federal contracts entered into on or after January 1, 2015, less than \$13.30 per hour, you may wish to seek counsel.**

.....

Recap Previously Published:

- Update: IRS Issues Guidance on Alternative Distribution Method for Form 1095-C
- NLRB Rescinds Biden-Era Policy Guidance on Non-Compete Agreements
- Update: Federal Court Blocks Aspects of Executive Orders Targeting DEI Efforts
- Update: Federal Government Contractors May No Longer Have 90 Days to Comply With Trump Administration's DEI Executive Order
- Shifts in NLRB Strategic Goals & Policy
- Shift in DOL Wage & Hour Unpaid Overtime Claims & Burden of Proof
- DOL Releases ERISA Enforcement 2024 Audit Results
- OSHA Form 300 Accidents, Posting and Submission Compliance Obligations – **Feb-March 2025**
- Creditable Coverage Determination 2025
- Part D Creditable Coverage Online Disclosure to CMS – **March 1, 2025 (for calendar year benefit plan years)**
- DOL Opinion Letter: FMLA & State PFML Management of PTO Usage
- DOL Opinion Letter: Managers & Tip-pool for Nonsupervisory Time
- ACA Reporting Requirement Changes
- Executive Order: Illegal DEI Efforts – Federal Contractors - **April 21, 2025**
- Article: Best Practices for Employers in Managing USCIS Administrative Onsite Inspections, ICE Raids & Form I-9 Audits.
- Supreme Court: Clarifies Evidence Standard for FLSA Overtime Exemption Disputes
- DOL Announces Dual Jobs Final Rule
- OSHA Revises PPE Standard for Construction Industry
- Form I-9: EAD Automatic Extension Period Lengthened
- 2025 IRS Mileage Reimbursement Rate



- Corporate Transparency Act (BOI Disclosure Requirements) Halted Ahead of Jan 1 (as of Dec 26, 2024)
- Gag Clause Attestation - **Dec. 31, 2024**
- PCORI Fee Amount Adjusted for 2025 – **Due July 31, 2025**
- Federal: DOL's 2024 Exempt Salary Rule Struck Down
- NLRB Prohibits Captive Audience Meetings
- NLRB Expands Definition of "Unlawful Communication" to Employees Concerning Effects of Unionization on Employer-Employee Relationship
- Federal Retirement & Benefit Limits – **2025**
- Draft Forms & Instructions for 2024 ACA Reporting Now Available
- ACA & Affordability - **2025**
- HIPAA Policies/Practices for New Reproductive Health Care Rights

See the "***Previously Reported Regulatory Matters***" Attachment for details pertaining to above referenced reminders.

SECTION III: Noteworthy State/City Compliance New Regulatory Announcements & Reminders

California

Reminder: Upcoming State Pay Data Report **Filing Due May 14**

Illinois

Update: State Makes Equal Pay Registration Certificate Updates for 2025

The Illinois Department of Labor (IDOL) is informing employers with [Equal Pay Registration Certificates](#) (EPRC) about changes that will impact upcoming filings.

Key updates include:

- A new, standardized [data template](#) with additional required fields:
 - Whether each position is subject to a collective bargaining agreement; and
 - Whether the position is paid hourly or salaried (and if hourly, the pay rate).
- A streamlined process for submitting Compliance Statements and other forms via a web-based submission, eliminating the need to download, complete, scan, and upload forms.

To accommodate these changes, IDOL is asking employers to delay submissions until after March 17, 2025, when the updated portal launches. After this date, only the new data template will be accepted.

Employers with EPRC **recertification deadlines between January 1, 2025, and March 30, 2025**, now have an extended deadline of **March 31, 2025**, with further extensions available upon request.



Access the State's Equal Pay Website [HERE](#) to learn more and access additional State Resources.

Massachusetts

Reminder: Upcoming State Pay Transparency Employer Obligations – July 2025

The legislation also requires private employers with 100 or more Massachusetts employees to submit EEO and pay data to the Commonwealth annually, February 1, for purposes of aggregated public reporting by the Massachusetts Department of Labor.

Employers must submit their first round of EEO and pay data to the Commonwealth by **February 3, 2025**. (Feb 1 falls on a Saturday).

The Act requires employers with over **25 or more employees in the Commonwealth** to disclose salary range information on job postings, and to provide pay range information to current employees in certain circumstances starting **July 31, 2025**.

The state's Executive Office of Labor and Workforce Development has released [FAQs](#) for the workforce data reporting. The link to submit the report through the Secretary of State's web portal will be posted on the FAQs page when it's available.

See original January HR WIRE publication or the HR WIRE Previously Published reference resource for additional details

Michigan

Reminder: Updated Paid Sick Leave – Eff March 23 & Oct 1, 2025

Just hours before the new laws were to take effect on February 21, Michigan passed amendments ([SB 8](#) and [HB 4002](#)) to both minimum wage and sick leave. The changes took effect immediately when signed by the governor a few hours later. The key changes and clarifications included below:

The future minimum wage increases are now a little bigger and coming a little sooner.

Min Wage Rates are now:

- \$13.73 per hour starting January 1, 2026
- \$15 per hour starting January 1, 2027

And now, instead of fully phasing out the tip credit, it will only be reduced to 50% of minimum wage by 2031. The future base minimum wage increases and tip credit changes are covered in this minimum wage [FAQ](#).

PAID SICK LEAVE

The legislature did *not* drastically overhaul the sick leave law (like they did back in 2018), but did make it a little easier to manage for small employers. They also added to or clarified a few aspects of the law.

Key changes:

- The definition of "small employer" is now an employer with 10 or fewer employees (instead of nine or fewer)
- Small employers don't have to comply until **October 1, 2025**
- Small employers only need to provide 40 hours of paid sick leave per year (the additional 32 hours of *unpaid* sick leave is not required)
- Employers can make new hires wait until their 120th day of work to use accrued earned sick time (EST) (instead of their 90th day)
- Employers now have until **March 23** to provide employees with notice of their EST rights (instead of February 21)



- Employees who are rehired within two months (instead of six) need to have their unused EST restored, unless it was paid out at termination

Key clarifications—many of these provisions would have been assumed even though they were omitted, but now they are crystal clear:

- Frontloading is expressly allowed and alleviates the need for carryover
- When EST is used, it should be paid at the employee's regular hourly rate or minimum wage (whichever is greater)—overtime, commissions, tips, and bonuses are expressly excluded
- Employers are expressly allowed to take disciplinary action against employees who use EST for inappropriate purposes
- Employers who opt to have a single bank of paid time off only need to treat 72 hours of it like EST (or 40 for small employers)

The [notice poster](#) provided by the state has been updated, as have the [FAQs](#).
Access the amended law [here](#).

Reminder: Expanded Child Labor Protections – April 2, 2025 & Oct 2, 2026

Michigan has amended its child labor laws to establish a more comprehensive framework of protections for minors (those aged 17 and younger). This includes requiring employers to register with the state's online system if hiring minors and dramatically reducing the maximum work hours for minors 15 and under, especially during school weeks. The amendments take effect **April 2, 2025**, though some provisions, including the registration system requirements, are effective October 2, 2026. [MI HB 5594](#) was signed by the governor on January 16, 2025.

Missouri

Update & Reminder: Upcoming State Earned (Paid) Sick Leave – April 15 & May 1, 2025

UPDATE: On March 13, 2025, the Missouri House of Representatives passed a bill (HB 567) that, if enacted, would repeal the paid sick leave requirement and delay the minimum wage increase. We will continue to follow and provide updates.

The state of Missouri has issued [FAQs](#) for the upcoming state's enacted earned sick leave requirements in response to Ballot initiative [Proposition A](#) which was approved November 5, 2024. As a reminder, the effective date of this new private employer requirement is May 1.

- Employees will start accruing 1 hour for every 30 hours worked at that time.
- The state will be releasing a workplace Notice and must post this notice by **April 15, 2025**. ETC will monitor and advise once the poster is released.
- ETC will release a State Handbook Addendum inclusive of the new required workplace policy in advance on May 1.

Key Provisions:

Application

The EPST law applies to employers of all sizes and most Missouri employees. However, the law contains some unique employee exemptions, including for employees of retail or services businesses with less than \$500,000 of annual gross sales.

Accrual, Carryover, and Frontloading

Employees will accrue EPST at a rate of one hour for every 30 hours worked starting May 1, 2025, or upon hire—whichever is later. Employers can calculate exempt employees' accrual based on a 40-hour workweek (even if employees generally work more than that) or their usual number of hours if they regularly work less than 40 hours.



Instead of using an hour-by-hour accrual system, employers can frontload the full amount of EPST that an employee is expected to accrue for immediate use at the beginning of each year.

Up to 80 hours of unused accrued EPST may be carried over from year to year. Frontloading EPST does not eliminate the carryover requirement. Rather, employers can only avoid carryover if they pay employees for their accrued but unused EPST (up to a maximum of 80 hours) at year-end *and* provide a lump sum of their full amount of EPST for immediate use at the beginning of the new benefit year.

Use

Employers with 14 or fewer employees can cap employees' use at 40 hours of EPST per year, while those with 15 or more employees can cap employees' use at 56 hours per year.

Employees can use EPST as soon as it's accrued for the following reasons:

- Their own or their family member's mental or physical illness, injury, or health condition, including preventive medical care
- The closure of their workplace or their child's school or place of care because of a public health emergency
- To care for themselves or a family member because of a determination of exposure to a communicable disease
- Certain covered reasons related to domestic abuse, sexual assault, or stalking of the employee or their family member

EPST needs to be provided in the smallest increment of time tracked by the employer's payroll system (but not more than one hour) and paid at the employee's hourly rate of pay or minimum wage, whichever is greater. For exempt employees, the hourly rate of pay is calculated by dividing the wages they earned by the number of hours worked in the previous pay period.

As is standard with sick leave laws, employers can't require that employees find their own coverage or deny them use of EPST if a replacement worker can't be found.

Documentation

When employees use EPST for three or more consecutive workdays, employers can request reasonable documentation that the leave was used for a covered purpose.

Notice

Employers must give employees notice about their EPST rights by April 15, 2025, or within 14 calendar days of hire, whichever is later. The notice must include the following information (in at least 14-point font):

- Beginning May 1, 2025, employees are entitled to accrue EPST at the rate of one hour for every 30 hours of work and may use EPST subject to the limits and terms of the law
- Employers can't take retaliatory action against employees who request or use EPST
- Employees' rights to bring a civil action in certain circumstances
- Contact information for the Missouri Department of Labor and Industrial Relations (DOL)

Additionally, employers must display a poster that contains this information in a conspicuous and accessible place for employees *if* the state has created one. We're hoping the state will release a model notice and poster in the near future.

Payout

Employers aren't required to pay out unused EPST when an employee quits or is terminated. However, employees who are rehired within nine months of separation must have their previously unused EPST restored.

More Information

The Missouri DOL has released [FAQs](#) on its website.

Nebraska

State's New Earned Paid Sick Time Requirement – Eff Sept 15 & Oct 1, 2025

On Nov. 5, 2024, Nebraska voters passed the [Nebraska Healthy Families and Workplaces Act](#) via ballot initiative, joining the growing number of states that have already enacted paid sick leave laws.

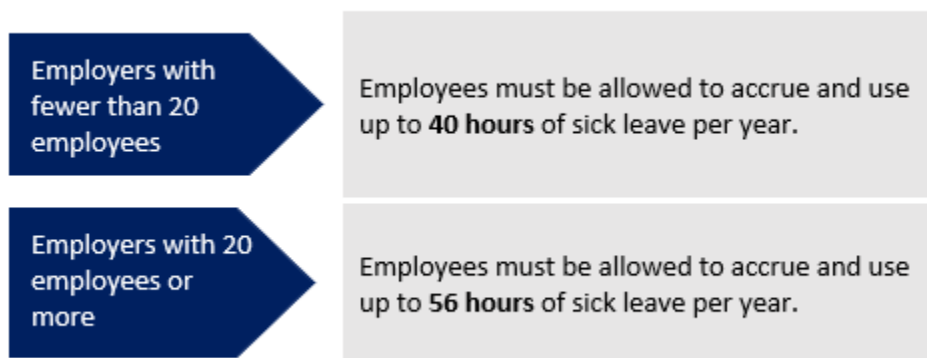
The law requires employers to provide 40-56 hours of earned paid sick time (EPST) per year, depending on their size. Employers must provide their employees with written notice of the law **by Sept. 15, 2025**, and employees begin accruing and using EPST **Oct. 1, 2025**.

Covered Employer

All employers are covered by the law, except the governments of the United States and the state of Nebraska and its agencies, departments and political subdivisions.

Eligible Employees

Employees who work in Nebraska for at least **80 hours** in a calendar year are eligible for EPST, except railroad employees subject to the federal Railroad Unemployment Insurance Act.



Key provisions of the Act include that:

- The law contains front-loading and carryover provisions;
- There is no waiting period—leave may be used as it is accrued;
- EPST may be used for an employee's or a family member's health, to attend meetings related to a child's health, and during public health emergencies;
- Employers may require notice of leave if the requirement is included in a written policy;
- Employers may require reasonable documentation for more than three days of EPST;
- Employers with paid leave policies that meet the requirements of the law do not have to provide additional paid sick leave;
- Notice and recordkeeping provisions apply;
- There is no payout requirement for accrued, unused EPST; and
- Retaliation is prohibited, and employer violations of the law are subject to administrative penalties and civil suits.

Closer to the effective date ETC will provide the released Notice and State Handbook Addendum with the applicable Paid Sick Leave Policy.



Nevada

Updated Guidance Released: State Heat Illness Prevention Rule – Enforced April 29, 2025

The Nevada Division of Industrial Relations (DIR) of the Department of Business and Industry adopted a heat illness [regulation](#). This regulation went into effect on Nov. 15, 2024.

Businesses with more than 10 employees must implement the following:

- Job hazard analysis;
- Written safety program;
- Emergency procedures;
- Training;
- Climate-controlled environment exemptions;
- Collective bargaining agreements.

Resources:

- Nevada Heat Illness Prevention [Rules](#)
- Nevada's [Guidance](#) on its Heat Prevention Rules

New York

State Expands Criminal History Records Protection – March 22, 2025

Beginning March 22, 2025, employers of all sizes will be prohibited from requiring an applicant or employee to provide a copy of their criminal history record obtained under the rules and regulations of the New York State Division of Criminal Justice Services (DCJS).

This new protection essentially closes a loophole that allowed employers to bypass restrictions on criminal history inquiries by requesting applicants and employees to obtain their own DCJS records, which contain information that employers are prohibited from considering. This change makes it clear that employers can't require applicants and employees to provide these confidential records.

Employers should review and, if necessary, update their hiring practices and policies to comply with this change by March 22.

Reminder: Upcoming State Enacts Retail Workplace Violence Prevention Law – March 25

On Sept. 4, 2024, New York enacted the Retail Worker Safety Act (the Act) ([S8358C/A8947C](#)). The Act is aimed at enhancing worker safety and mitigating the risk of workplace violence in retail environments. It applies to employers that have 10 or more employees working in a retail store. Under the Act, a "retail store" is defined as a store that sells consumer commodities at retail and is not primarily engaged in the sale of food for consumption on the premises.

Important Upcoming Dates:

March 3, 2025 - Employers must have their workplace violence prevention policy and training implemented.

January 1, 2027 - Employers with 500 or more retail employees nationwide must provide panic-button access to employees.

Regulatory Requirements

- Employer must implement written workplace violence prevention policies that address workplace violence risk factors and prevention methods.
- Additionally, they are required to provide information and interactive training to employees on various workplace violence issues. These include "measures that retail employees can use to protect themselves when faced with workplace violence," such as de-escalation tactics, active shooter drills, emergency procedures, security alarms, panic buttons, and other emergency devices. Employers will have to provide this training to each employee upon hire, and then at least annually thereafter.



- Also, employers must provide access to panic buttons. This provision goes into effect on **January 1, 2027**, and it applies to any employer with 500 or more retail employees *nationwide*. Employers that must comply with this section may choose to provide panic buttons throughout their workplaces or mobile phone-based panic buttons.

Key Takeaways: New York retail employers should review the requirements of the Act and create a workplace violence prevention policy or adopt the model policy developed by the NY DOL by **March 3, 2025**. Retail employers that have a current workplace violence prevention policy should ensure their policies meet or surpass the minimum requirements of the NY DOL model policy. Retail employers should ensure that employees receive workplace violence prevention training as required under the Act. In addition, employers with 500 or more employees should prepare to have panic buttons implemented by Jan. 1, 2027, to comply with the Act's requirements.

New York Amends the Warehouse Worker Injury Reduction Act - **June 1, 2025**

On Feb. 14, 2025, New York amended its [Warehouse Worker Protection Act](#) (WWPA). The amendments change the definition of "musculoskeletal injuries and disorders" to "work-related musculoskeletal disorders," expand who can conduct workplace evaluations and require employee input during such evaluations.

The new amendments go into effect on **June 1, 2025**.

The WWPA applies to warehouse distribution centers that directly or indirectly employ or exercise control over the wages, hours or working conditions of:

- 100 or more employees at a single warehouse distribution center; or
- 1,000 or more employees at one or more warehouse distribution centers in the state.

Employer Takeaway: Applicable employers should review the amended WWPA rules and ensure the new requirements are implemented by the specified effective dates.

Ohio

Reminder: Upcoming State Required Pay Statements – April 9

Beginning April 9, employers of all sizes will be required to provide detailed pay statements (aka pay stubs) to all employees. Prior to this change, Ohio was one of only a few states that did not legally require employers to provide pay stubs.

Under this new law, employers will need to provide employees with detailed pay statements on each regular payday that include the following information for the pay period:

- Employee's name and address
- Employer's name
- Total gross wages paid
- Total net wages paid
- Amount and purpose of each addition or deduction from the wages
- Date paid and pay period

For hourly employees, the pay stub must also include the total hours worked, the number of overtime hours, and the hourly wage that the employee was paid. Employers can provide these pay stubs in written or electronic form, or by giving employees access to a statement that has this information, such as within an online portal.

.....



**See the “*Previously Reported Regulatory Matters*” Attachment
for details regarding state-specific reported matters**

Alaska

- **Reminder:** New Paid Sick Leave Regulations - **July 1, 2025**
- **Reminder:** State Votes in Favor of Captive Audience Ban – **July 1, 2025**

California

- **Reminder:** State’s Pay Data Report Filing - Platform Open **Feb 3, 2025** & Filing Due – **May 14, 2025**
- **Reminder:** California’s Bird Flu State of Emergency Notice Requirements
- **Reminder:** San Diego County Fair Chance Ordinance - **Oct 10, 2024**
- **Reminder:** Upcoming Local Minimum Wage Ordinance Increases – **Jan 1, 2025**
- **Reminder:** State Expands Discrimination Protections – **Jan 1, 2025**
- **Reminder:** State Passes Freelance Worker Protections Act – **Jan 1, 2025**
- **Reminder:** Paid Sick Leave Expansion – **Jan 1, 2025**
- **Reminder:** State Amends Victim Leave for Employees – **Jan 1, 2025**
- **Reminder:** Jury & Witness Duty Leave Oversight & Enforcement Change– **Jan 1, 2025**
- **Reminder:** State Passes Captive Audience Ban – **Jan 1, 2025**
- **Reminder:** Expanded Use of CA Paid Sick Leave – **Jan 1, 2025**
- **Reminder:** CA Employers Lose Option to Require Vacation Leave Before PFL – **Jan 1, 2025**
- **Reminder:** Workplace Safety Enacted Provisions Effective **Jan 1, 2025**
- **Reminder:** CA Disability Insurance Updates – **Jan 1, 2025**
- **Reminder:** Small Employer Mediation Program – Permanent – **Jan 1, 2025**
- **Reminder:** CA PAGA FAQ Published
- **Reminder:** State Transparency Requirements-Child Labor Practices–**Jan 1, 2025**

Colorado

- **Reminder:** State Enacts Comprehensive AI Legislation - **Feb 1, 2025**
- **Reminder:** State FAMLI Rules Include Coordination of Benefits with other Leave Benefits & Employer Penalties
- **Reminder:** Holiday Incentive Pay in Regular Rate of Pay Calculation

Connecticut

- **Reminder:** State Issues FAQs in New Paid Sick Leave Requirements – **Jan 1, 2025**
- **Reminder:** Expands Family Violence Leave – **Oct 2024**
- **Reminder:** Connecticut Expands Paid Sick Leave Law (HB 5005)– **Jan 1, 2025**

Delaware

- **Reminder:** State Adds Housing Status as a Protected Characteristic – **Sept 26, 2024**
- **Reminder:** Key Deadlines Approaching for Paid Family Medical Leave (19 DAC 1401)–**Dec 1 & 2; Jan 1, ‘25**
- **Reminder:** State Added Housing Status as a Protected Characteristic “Housing Status” – **Sept 26, 2024**

District of Columbia

- **Reminder:** Universal Paid Leave Act’s Paid Family Leave Notice – **Feb 1, 2025**

Illinois

- **Reminder:** Navigating Updated State E-Verify and I-9 Compliance Requirements – **Jan 1, 2025**
- **Reminder:** Expanded Employee Protections (HB 2161 amending Illinois Human Rights Act) for “Family Responsibilities” – **Jan 1, 2025**
- **Reminder:** State Enacts Whistle Blower Act – **Jan 1, 2025**
- **Reminder:** State Issues FAQs – Pay Transparency Law – **Jan 1, 2025**
- **Reminder:** Cook County Updates Paid Leave Guidance Issued – **Oct 24, 2024**



- **Reminder:** IL Amended Right to Privacy in the Workplace Act (SB 508) – **Jan 1, 2025**
- **Reminder:** State Grants Employees the Right to Inspect Pay Stubs Upon Request (SB 3208 & HB 3763) – **Jan 1, 2025**
- **Reminder:** Worker Freedom of Speech Act – Captive Audience Prohibition (SB 3649)- **Jan 1, 2025**
- **Reminder:** Human Rights Act Amended - Expansion of Protected Classes (HB 4867, HB 1261, SB 3310 & HB 5371) – **Jan 1, 2025**
- **Reminder:** State Enacts New Child Labor Laws (SB 3646) – **Jan 1, 2025**
- **Reminder:** Illinois Wage Payment and Collection Act (IWPCA) Amended - Employees the Right to Inspect Pay Stubs Upon Request (SB 3208) – **Jan 1, 2025**
- **Reminder:** State Pay Transparency Laws & Equal Pay Act applicable to smaller employers (HB 3129) – **Jan 1, 2025**

Maine

- **Reminder:** Paid Family & Medical Leave – [PFML Final Rule](#) Issued by State with Payroll withholdings commencing **Jan 1, 2025** (Benefits Available **5/1/26**)
- **Reminder:** Maine's Paid Family & Medical Leave (PFML) Launches (Wage withholding, Workplace Poster & Written Notice requirements) – **Jan 1, 2025**

Maryland

- **Reminder:** State's Family and Medical Leave Insurance (FAMLI) Program/Time to Care Act – Expanded Leave Rights – **July 1, 2025 & 2026**
- **Reminder:** Multiple Employment Laws Updated Effective – **Oct 1, 2024**
- **Reminder:** Maryland Adopts Heat Stress Standards – **Sept 20, 2024**

Massachusetts

- **Reminder:** Pay Transparency Annual Submission of EEO Data to State – **Feb 2025** (ERs >100 Employees submit EEO Data) & **July 2025** (ERs with 25 or more Employees must disclose salary ranges in job postings)
- **Reminder:** Employers Must Complete HIRD Form - **Dec 15, 2024**
- **Reminder:** PFML Rate Sheets & Employee Notices – **Dec 2, 2024**
- **Reminder:** Amended State Earned Sick Time to Cover Reproductive Loss – **Nov 21, 2024**
- **Reminder:** MA 2025 PFML Benefit to Increase – **2025**

Michigan

- **Reminder:** State Expands Child Labor Protections – **April 2 & Oct 2, 2025**
- **Reminder:** State's Earned Sick Time – Eff ~~Feb 21, 2025~~ **UPDATE: March 23 & Oct 1 (Small Employers)**
- **Reminder:** State Issues FAQs and Other Materials for Earned Sick Time Act – **Feb 21, 2025**
- **Reminder:** State Supreme Court Increases Minimum Wage and Paid Sick Leave Requirements – **Feb 2025**

Minnesota

- **Reminder:** State's Leave Guidance Issued for Option Out – Private Plans
- **Reminder:** State Makes Several Changes to Work Comp Laws – **Aug & Oct 2024**
- **Reminder:** State Paid Leave Wage Reports - **Oct 31, 2024**
- **Reminder:** Pay Transparency (Wage Disclosure Protection Law) - **Jan 1, 2025**
- **Reminder:** State Amends Sick Leave, Paid Family and Medical Leave ([SF 5234/HF 5247](#))

Missouri

- **Reminder:** State Passes Earned Paid Sick Leave Initiative ([Proposition A](#)) – Notice to Employees – **April 15, 2025 & Leave Accrual Starts May 1, 2025**

Nebraska

- **Reminder:** State Enacts Paid Sick Leave – **Oct 1, 2025**

Nevada



- **Reminder:** State Approves New Heat Illness Regulation & Employer Obligations – Nov 15 & Enforcement +90 Days

New Hampshire

- **Reminder:** Firearms in Employee Vehicles ([HB 1336](#)) State Regulation – Jan 1, 2025

New Jersey

- **Reminder:** Employers' Use of AI Tools to Comply with State's Anti-discrimination Laws
- **Reminder:** Expanded Pay Transparency Regulations ([SB 2310](#)) – June 1, 2025
- **Reminder:** New Jersey Family and Disability Insurance Leave Rates to Increase - 2025
- **Reminder:** Upcoming Deadlines for RetireReady NJ - Sept & Nov 2024
- **Reminder:** New Jersey Family and Disability Insurance Leave Rates to Increase – Jan 1, 2025

New York

- **Reminder:** State Retail Workplace-Violence Prevention Obligations - June 2, 2025
- **Reminder:** State Establishes Warehouse Workers Injury Reduction Program Act – June 1, 2025
- **Reminder:** State Publishes FAQs for New Paid Prenatal Leave Requirement – Jan 1, 2025
- **Reminder:** NY Expands Protections for National Guard Service – Sept 27, 2024
- **Reminder:** New York PFL Contribution and Benefit Rates to Increase in 2025
- **Reminder:** Clean Slate Act (Expanded Criminal History Protections - [NY S 940](#))– Nov 16, 2024
- **Reminder:** Mandated Paid Prenatal Leave ([A08805](#)) – Eff Jan 1, 2025

Ohio

- **Reminder:** State Enacts Wage Statement Regulations – Eff April 9, 2025

Oregon

- **Reminder:** State Updates Administrative Rules for Paid Leave – Jan 1, 2025
- **Reminder:** Paid Leave Oregon & OFLA Leave Change - Jan 1, 2025
- **Reminder:** State Warehouse Quota Notification Requirements – Jan 1, 2025

Pennsylvania

- **Reminder:** PA Now Permits Direct Deposit Payment of Workers' Compensation Benefits

Rhode Island

- **Reminder:** State Amends Temporary Caregiver Insurance (TCI) Law – Jan 1, 2025
- **Reminder:** State Enacts New Consumer Data Privacy Law – Jan 1, 2025

Washington

- **Reminder:** State Announces PFML Premium Rate for 2025 – Jan 1, 2025
- **Reminder:** State Expansion of Paid Sick Leave ([SB 5793](#)) – Jan 1, 2025

Vermont

- **Reminder:** State Requires Pay Ranges in Job Postings ([VT H 704](#))– July 1, 2025

The HR WIRE is for informational purposes only and should not be construed as legal advice.