

## Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline

Jurisdiction	Scope: covered employers	Scope: covered employees (hours threshold) [exclusions]	Usage: Used beyond self?	Usage: what can it be used for	Usage: documentation	Usage: increments	Usage: how counted (accrual rate)	Usage: accrual start	Usage: when able to access	Usage: cap on hours	Accrual: carryover	Usage: relationship to PTO
CA - state	All	<p>All employees that work with the same employer for at least 30 days/year (including part-time, per diem and temp.)</p> <p>Also includes employees of a staffing agency so whoever is the employer or joint employer is required to provide paid sick leave</p> <p>Also includes seasonal workers if they work with the same employer within 12 months of their separation and otherwise meet 30 day requirements</p> <p>Excludes:</p> <ul style="list-style-type: none"> <li>Providers of publicly-funded In-Home Supportive Services (IHSS)</li> <li>Employees covered by collective bargaining agreements with specified provisions</li> <li>Individuals employed by an air carrier as a flight deck or cabin crew member, if they receive compensated time off at least equivalent to the requirements of the new law</li> <li>Retired annuitants working for governmental entities</li> </ul>	Includes parents, child, spouse, registered domestic partner, grandparent, grandchild, and sibling	<p>Physical/mental illness, injury or condition</p> <p>Safe time: yes (both employee and family members)</p>	Not addressed	Employer can set a “reasonable minimum increment,” not to exceed 2 hours, for the use of paid sick leave	<p>Allows for two options:</p> <p>Accrual policy: 1 hour for every 30 hours worked</p> <p>No accrual/up front policy: full amount of leave available at beginning of year, except for new hires who need to wait 120 days [note: inconsistency within same Dept. Of Industrial Relations FAQ]</p>	At start of employment (or if already employed at ordinance’s effective date)	After 90 calendar days of employment	<p>Law allows employers to limit an employee’s <u>use</u> of paid sick leave to 24 hours-3 days/year</p> <p>Accrual cap of no more than 48 hours-6 days/year</p>	Yes, but employers are able to cap by policy	<p>If employer already offers PTO or sick time that meets requirements of new law, policy does not change</p> <p>According to CA FAQ: each plan must satisfy the accrual, carryover, and use requirements of the new law.”</p> <p>Accrual method can vary, but must provide at least 1 hour for every 30 hours worked and must allow for accrual that results in no less than 24 hours accrued sick leave/PTO by the end of 120<sup>th</sup> calendar day of employment, or each calendar year, or in each 12 month period.</p> <p>Law also provides a “grandfather” clause which allows those with sick/PTO policies in existence prior to Jan. 1, 2015 to maintain them and be deemed in compliance as long as they meet the following::</p> <ul style="list-style-type: none"> <li>Policy provides no less than 1 day or 8 hours of accrued paid sick/PTO within 3 months of employment per year</li> <li>The employee was eligible to earn at least 24 hours-3days sick leave/pto within 9 months of employment</li> </ul> <p>Sick leave provided to governmental employees pursuant to either certain Government Code provisions or a memorandum of understanding presumed to meet the accrual requirements</p>
CA - San Francisco	All	<p>Employees employed in the city. Includes temp. and part-time workers</p> <p>Also includes occasional employees who work within the city for at least 56 hours or more/year</p> <p>Excludes:</p> <ul style="list-style-type: none"> <li>CBA covered employees if CBA waives it in clear</li> </ul>	Includes children; parents; siblings; grandparents; grandchildren; spouses; registered domestic partners; and, if a worker has no spouse/domestic partner, a designated person of the worker’s choice	<p>Physical/mental illness, injury or condition</p> <p>Safe time: no (med issues relating to dom. viol would count as regular use of sick time)</p>	Employer <u>may</u> require if sick time used past 3 consecutive days	Not addressed by ordinance  Under city FAQ: employers can allow for leave in 1 hour increments, in less than 1 hour if the employer so chooses, and	1 hour for every 30 hours worked	For qualified employees before effective date, starts immediately  For new employees after effective date, after 90 days of employment.	Immediately upon accrual	<p>72 hours/ year: employers with 10+ employees</p> <p>40 hours/year: employers with less than 10 employees</p> <p>Note: cap is “floating”: when an employee’s</p>	Yes up to yearly caps	Compliance can be achieved if employers meet minimum requirements of paid sick leave ordinance (more expansive than just complying with state law) – must meet accrual and use requirements at a minimum

## Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline

Jurisdiction	Scope: covered employers	Scope: covered employees (hours threshold) [exclusions]	Usage: Used beyond self?	Usage: what can it be used for	Usage: documentation	Usage: increments	Usage: how counted (accrual rate)	Usage: accrual start	Usage: when able to access	Usage: cap on hours	Accrual: carryover	Usage: relationship to PTO
		and unambiguous terms				imposes a "reasonableness" requirement in others: "In most employment situations, a requirement that an employee take off more hours than requested would not be considered reasonable."				accrued leave drops below the cap due to usage, the employee begins to accrue again.		
CA – Emeryville	All	Employees employed in the city who work at least 2 hours of work/week and who are entitled to min. wage under CA law  Excludes: <ul style="list-style-type: none"> <li>Employees covered by a CAB expressly waiving the benefit</li> </ul>	Yes – same as San Fran + time can also be used to care for a guide dog, signal dog, or service dog of the employee/ family member/ designated partner	Physical/mental illness, injury or condition  Safe time: no (med issues relating to dom. viol would count as regular use of sick time)	Not addressed	Not addressed	1 hour for every 30 hours worked	At start of employment (or if already employed at ordinance's effective date)	After 90 calendar days of employment	55 or less employees: 48 hours/year  55+ employees: 72 hours/year  [Note: size of employer is based on # of employees who work in Emeryville]	Yes, but employers are able to cap by policy	Not addressed so state law applies
CA – Oakland	All	Employees employed in the city who work at least 2 hours of work/week and who are entitled to min. wage under CA law  Excludes: <ul style="list-style-type: none"> <li>Employees covered by a CAB expressly waiving the benefit</li> </ul>	Yes – same as San Fran	Physical/mental illness, injury or condition  Safe time: no (med issues relating to dom. viol would count as regular use of sick time)	Employer <u>may</u> require if sick time used past 3 consecutive days  If employer suspects abuse, <u>may</u> require documentation to verify subsequent uses of sick leave even if less than 3 days  May not require an employee to incur expenses larger than \$5 to show eligibility of sick leave	Time may be used in increments of 1 hour or even less	1 hour for every 30 hours worked	At start of employment (or if already employed at ordinance's effective date)	After 90 calendar days of employment	10 or less employees: 48 hours/year (originally had 40, but had to expand to meet state law)  10+ employees: 72 hours/year  [Note: size of employer is based on # of employees regardless of location]	Yes up to yearly caps	Compliance can be achieved if an employer offers PTO sufficient to meet or exceed accrual requirement of ordinance  From Oakland's City Attorney FAQ: must allow for same purposes as specified in law and must meet accrual requirements
CT - state	Any employer with 50+	All service workers as defined by law (per state classification and must be	Includes child and spouse	Physical/mental illness, injury or condition	3 days or more, employer <u>may</u> require	Not addressed	1 hour for every 40 hours worked	At start of employment or at effective date	After 680 hours of employment (or from law's	40 hours/year	Yes – 40 hours per year regardless of	Employers in compliance if existing policy meets min. requirements of accrual rate and use

Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline

Jurisdiction	Scope: covered employers	Scope: covered employees (hours threshold) [exclusions]	Usage: Used beyond self?	Usage: what can it be used for	Usage: documentation	Usage: increments	Usage: how counted (accrual rate)	Usage: accrual start	Usage: when able to access	Usage: cap on hours	Accrual: carryover	Usage: relationship to PTO
	employees in CT  Excludes: Certain industrially classified businesses, 501(c)(3) organizations that provide recreation, child care and educational services	paid on hourly basis and not exempt from min. wage/OT reqs.  Excludes: <ul style="list-style-type: none"> <li>Day or temp. workers (work per diem or on occasional/irregular basis)</li> </ul>		Safe time: yes (both employee and family members)	“reasonable documentation”  If foreseeable, employer <u>may</u> require advance notice not to exceed 7 days.  If not, notice as soon as practicable.			of law for current employees	effective date for current employees), and then can only use if worked an average of 10 hours/week in most recently completed quarter		how many accrued	Per FAQ: employers will be deemed to be in compliance with this law if they offer paid time off that either meets or exceeds the requirements of the act, meaning accrual and use rates, and reasons for the need for leave, etc.
DC – Washington	All	All employed within city limits  Excludes: <ul style="list-style-type: none"> <li>Independent contractors</li> <li>Students</li> <li>Health care workers choosing to participate in a premium pay program</li> <li>Unpaid volunteers engaged in the activities of an educational, charitable, religious, or nonprofit organization</li> <li>Casual babysitters</li> <li>Bar and restaurant workers who work for a combination of wages and tips</li> <li>Workers in the building and construction industry covered by a CBA that expressly waives the requirement</li> </ul>	Includes children; spouse; parents (in-laws); grandchildren; children’s spouses; siblings; and spouses; persons sharing residence with employee for at least 12 preceding months	Physical/mental illness, injury or condition  Safe time: yes (both employee and family members)	Employer <u>may</u> require if sick time used past 3 consecutive days	Not specifically addressed, but city FAQ states that time should be used in accordance with employer’s policy and that generally, a requirement making an employee take off more hours than requested would not be considered reasonable	1 hour for every 87 worked: employers with 24 or less employees  1 hour for every 43 worked: employers with 25-99 employees  1 hour for every 37 worked: employers with 100+ employees	At start of employment (or if already employed at ordinance’s effective date)  Accrued hours for tipped restaurant or bar employees do not apply prior to Feb 2014 amendment	After 90 calendar days of employment	24 hour/year: employers with 24 or less employees  40 hours/year: employers with 25-99 employees  56 hours/year: Employers with 100+ employees	Yes up to yearly caps	Compliance can be achieved if employers meet minimum requirements of paid sick leave ordinance  “An existing compensated leave policy shall be presumed to be equivalent to requirements of the Act if the policy allows the employee to: (a) Access and accrue compensated leave at the same rate or greater than the hours of leave provided in § 3201 of this Chapter; or (b) Use the compensated leave for the same purposes as those set forth in § 3203.” [3203 specifies medical, mental health and safe time usages]
MD - Montgomery County	All operating within county	All employees within county  Excludes: <ul style="list-style-type: none"> <li>Employees who do not have a regular work schedule with an employer, contact the employer for assignments and are scheduled for work within 48 hours of</li> </ul>	Includes children; parents and legal guardians; spouses; grandparents (and spouses); grandchildren; siblings (and spouses)	Physical/mental illness, injury or condition  Safe time: yes (both employee and family members)	Employer <u>may</u> require if sick time used past 3 consecutive days	Time may be used in the smallest increment that the employer’s payroll system uses to account for absences or work time, except that an employee must not be required	1 hour for every 30 hours worked ( <i>but see cap</i> )	At start of employment (or if already employed at ordinance’s effective date)	Employer may opt to limit access until after 90 days of employment  Employer also allowed to “front load” hours	56 hours/year  For businesses with less than 5 employees, only 32 hours must be paid and 24 can be provided on an unpaid basis	Yes up to yearly caps (though can use up to 80 hours/year if they have that amount when time has been carried over)  Employers that provide “front	Not addressed

## Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline

Jurisdiction	Scope: covered employers	Scope: covered employees (hours threshold) [exclusions]	Usage: Used beyond self?	Usage: what can it be used for	Usage: documentation	Usage: increments	Usage: how counted (accrual rate)	Usage: accrual start	Usage: when able to access	Usage: cap on hours	Accrual: carryover	Usage: relationship to PTO
		contact, have no obligation to work for the employer without having initiated contact, and are not employed by a temp. agency <ul style="list-style-type: none"> <li>Employees working less than 8 hours/week</li> <li>Independent contractors</li> </ul>				to take earned sick and safe time in an increment of more than 4 hours [was originally 1 hour, but subsequently amended]					loaded” time need not allow carryover	
NJ - Jersey City Newark Passaic East Orange Paterson Irvington Trenton Montclair Bloomfield Elizabeth	All operating within city	Employees employed in the city who work 80 hours/year  Excludes: Employees of any govt., NJ school district, Bd. of Ed., & Rutgers U.	Includes children; parents; parents of a spouse or domestic/civil union partner; spouses; domestic/civil union partners; grandchildren; grandparents; the spouse or domestic/ civil union partner of a grandparent; and siblings	Physical/mental illness, injury or condition  Safe time: no (med issues relating to dom. viol would count as regular use of sick time)	Employer <u>may</u> require if sick time used past 3 consecutive days	Time may be used in the smaller of hourly increments of the smallest increment that the employer’s payroll system uses to account for absences or use of other time.	1 hour for every 30 hours worked (for both paid and unpaid sick time)	At start of employment (or if already employed at ordinance’s effective date)	After 90 days of employment	40 hours/year: employers with 10+ employees  40 hours of <i>unpaid</i> sick time/year: employers with less than 10 employees	Yes up to yearly caps	Compliance can be achieved if employers meet minimum requirements of paid sick leave ordinance  Jersey City: must meet total annual accrual requirements and allow for it to be used for same purpose and under the same conditions as ordinance
NY – New York City	Employers with 5+ employees  Employers with 1+ domestic workers who have worked for the employer for at least a year and who work 80+ hours/year must provide paid sick leave  [Note: Employers with 4 or less employees must	Employees employed in the city who work more than 80 hours/ year are covered. Domestic workers included where they’ve worked for the same employer for at least 1 year and over 80 hours/year. Includes part-time, temp., per diem and on call, undocumented, and transitional job program employees. Also includes telecommuters provided they qualify as working within the city  For franchises, where owner/principal of multiple locations owns at least 30% of each location and they operate under same franchise agreement, total number of employees includes all employees in NYC provides the collective locations employ at least 5 employees all together	Includes children; spouses; registered domestic partners; parents; grandchildren; grandparents; siblings; and the parents of a spouse or domestic partner	Physical/mental illness, injury or condition  Safe time: no (med issues relating to dom. viol would count as regular use of sick time)	Employer <u>may</u> require if sick time used past 3 consecutive days	Allows employers to set a “reasonable” minimum daily increment, but the minimum cannot be more than 4 hours per day unless otherwise permitted by state/federal law.	1 hour for every 30 hours worked (for both paid and unpaid sick time, as described below)	At start of employment (or if already employed at ordinance’s effective date)  If covered by a CAB that is in effect at time of law, employees accrue under new ordinance on the date the CBA terminates  Though not required, employer <u>may</u> allow for “front loading” in advance of accrual	After 120 days of employment	40 hours/year: employers with 5+ or employees  40 hours of <i>unpaid</i> sick time/year: employers with less than 5 employees	Yes up to yearly caps	Compliance can be achieved if employers meet minimum requirements of paid sick leave ordinance  Minimum requirements: <ul style="list-style-type: none"> <li>Must apply to all covered employers as per scope</li> <li>Must meet accrual requirements</li> <li>Must allow for use of at least 40 hours within 12 month period</li> <li>Must allow for use requirements as per law (self and family)</li> <li>Cannot impose limitations or conditions beyond those in law</li> <li>Allows for carry over of 40 hours (unless employer allows front loading)</li> <li>Provides that employees are paid at least their regular hourly rate, but no less than \$9/hour (min. wage) for paid leave</li> <li>Allows employees to use without retaliation and does not interfere with the right to file a complaint</li> </ul>

## Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline

Jurisdiction	Scope: covered employers	Scope: covered employees (hours threshold) [exclusions]	Usage: Used beyond self?	Usage: what can it be used for	Usage: documentation	Usage: increments	Usage: how counted (accrual rate)	Usage: accrual start	Usage: when able to access	Usage: cap on hours	Accrual: carryover	Usage: relationship to PTO
	provide <u>unpaid</u> sick time]	Excludes: <ul style="list-style-type: none"> <li>• Work-study students</li> <li>• Certain hourly speech/physical/occupational therapists</li> <li>• Independent Contractors</li> <li>• Participants in Work Experience Programs</li> <li>• Government employees</li> <li>• Certain employees subject to CAB's</li> </ul>										
OR - state	All that employ 10+ employees  [Note: Employers with 9 or less employees must provide <u>unpaid</u> sick time]  Excludes federal employees	Employees within state including part-time and temp.  Excludes: <ul style="list-style-type: none"> <li>• Certain employees who are covered by a CAB, employed through a hiring hall and whose benefits are provided by a joint multi-employer-employee trust or benefit plan</li> </ul>	Includes child; spouse; same-gender domestic partner; parent (in-laws); parent of an employee's same-gender domestic partner; grandparent or grandchild; person with whom the employee is or was in a relationship of in loco parentis	Physical/mental illness, injury or condition  Safe time: yes (both employee and family members)	Employer <u>may</u> require if sick time used past 3 consecutive days.	Employees must use accrued sick time in hourly increments unless to do so would pose an undue hardship to the employer, in which case the employer may require sick time to be taken in minimum increments of 4 hours	1 hour for every 30 hours worked or 1 1/3 hour for every 40 hours worked	At start of employment (or if already employed at ordinance's effective date)  Employers can opt to "front load" 40 hours of sick time at beginning of the year or track hours worked	After 90 calendar days of employment	40 hours/year	Yes – up to 40 hours though employers may adopt policies that limit accrual to no more than 80 hours or usage to no more than 40 hours/year	Employers in compliance if their plan is "substantially equivalent" to the minimums of the law established  Per Notice poster: "Substantially equivalent" means that employees are allowed to use at least the same number of hours for the same purposes under the same or more generous rules as outlined in this notice."
OR - Portland	All except federal, state and other subdivision of city/county/state gov't. that employ at least 6= employees  [Note: Employers with 5 or less employees must provide <u>unpaid</u> sick time]	Employees employed in the city who work 240 hours+/year (regardless of employer location); includes temp. employees, staffing agencies and telecommuters (latter depends on where the employee is conducting the work)  Excludes: <ul style="list-style-type: none"> <li>• A co-partner of the Employer</li> <li>• An independent contractor</li> <li>• A participant in a work training program administered under state or federal assistance laws</li> <li>• A participant in a work study program that provides students in</li> </ul>	Includes child; spouse; same-gender domestic partner; parent (in-laws); parent of an employee's same-gender domestic partner; grandparent or grandchild; person with whom the employee is or was in a relationship of in loco parentis	Physical/mental illness, injury or condition  Safe time: yes (both employee and family members)	Employer <u>may</u> require if sick time used past 3 consecutive days	Can use in increments of 1 hour unless a lesser increment is allowed by the employer  Employer cannot require use of full shift as a condition to using sick leave unless it is physically impossible for the employee to commence or end work partway through the shift	1 hour for every 30 hours worked or 1 1/3 hour for every 40 hours (generally applies to salaried employees)	At start of employment (or if already employed at ordinance's effective date)  Though not required, employer <u>may</u> allow for "front loading" in advance of accrual	After 90 days of employment provided they worked a minimum 240 hours/year	40 hours/year though employers can allow more	Yes up to yearly caps for accrued time  Employers that provide "front loaded" time need not allow carryover	Compliance can be achieved if employers meet minimum requirements of paid sick leave ordinance  Per ordinance: "Employers with Sick Leave or PTO policies that provide their Employees with Sick Time that equals or exceeds the requirements of the Ordinance shall be deemed in compliance with the accrual and use sections of the Ordinance."

## Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline

Jurisdiction	Scope: covered employers	Scope: covered employees (hours threshold) [exclusions]	Usage: Used beyond self?	Usage: what can it be used for	Usage: documentation	Usage: increments	Usage: how counted (accrual rate)	Usage: accrual start	Usage: when able to access	Usage: cap on hours	Accrual: carryover	Usage: relationship to PTO
		secondary or post-secondary educational institutions with employment opportunities for financial and/or vocational training <ul style="list-style-type: none"> <li>Railroad workers exempted under the Federal Railroad Insurance Act</li> </ul>										
PA - Philadelphia	All employers with 10+ employees for at least 40 weeks/year  [Note: employers with 9 employees or less must provide unpaid sick leave]	Employees employed in the city who work 40 hours/year  Excludes: <ul style="list-style-type: none"> <li>Independent contractors</li> <li>Seasonal workers (hired for not more than 16 weeks/year)</li> <li>Adjunct professors</li> <li>Interns</li> <li>Workers hired for a term of less than 6 months</li> <li>State and federal employees</li> <li>Health care professionals (excluding those employed by a temp placement agency) who only work when they say that they are available and who aren't obligated to work if they are not available</li> <li>Employees covered by a bona fide CBA</li> </ul>	Includes children; parents; parents-in-law; spouses; grandparents (and spouses); grandchildren; siblings (and spouses); life partners (a long-term committed relationship between two unmarried individuals of the same sex or gender identity who meet certain, specified requirements)	Physical/mental illness, injury or condition  Safe time: yes (both employee and family members)	Employer <u>may</u> require if sick time used past 2 consecutive days.	Accrued sick time may be used in the smaller of hourly increments or the smallest increment that the employer's payroll system uses to account for absences or use of other time	1 hour for every 40 hours worked	At start of employment (or if already employed at ordinance's effective date)	After 90 calendar days of employment	40 hours/year: employers with 10+ employees  40 hours of <i>unpaid sick leave</i> / year for employers with less than 10 employees  Chain establishment (with at least 15+ establishments whether or not located in Philadelphia and regardless of ownership) must provide paid sick time regardless of the number of employees	Yes up to yearly caps  Employers that provide "front loaded" time need not allow carryover	Compliance can be achieved if an employer offers PTO sufficient to meet or exceed accrual requirement of ordinance and as long as employee can use in the same manner as required in ordinance  Per ordinance: "Any employer with a paid leave policy, who makes available an amount of paid leave (including but not limited to vacation days, sick days, short-term disability benefits, floating holidays, parental leave, personal days, or PTO), sufficient to meet or exceed the accrual requirements of this Section, and that may be used for the same purposes and under the same conditions as sick time under this Chapter, is not required to provide additional sick time."
WA - Seattle	Businesses with 4+ employees	Employees employed in the city that work over 240 hours/year  Excludes: <ul style="list-style-type: none"> <li>Federal/state/county employers</li> <li>Employees who work or telecommute outside of Seattle</li> <li>Employees who travel through Seattle</li> <li>Students enrolled in a work study program</li> <li>Two year exemption for new small and medium-sized employers (Tier 1)</li> </ul>	Includes children; parents (and in-laws); grandparents; spouses; and registered domestic partners	Physical/mental illness, injury or condition  Safe time: yes (both employee and family members)	Employer <u>may</u> require if sick time used past 3 consecutive day.  Employer <u>may</u> ask for documentation for absences shorter than 3 days if there is a clear instance or pattern of abuse  Police report required for paid safe time	For employees covered by FLSA overtime requirements, time may be used in hourly increments or smaller if allowed by an employer  For employees exempt employees, time to be deducted in accordance with FLSA	1 hour for every 30 hours worked: employers with 250+ employees (Tier 3)  1 hour for every 40 hours worked: employers with 4-249 employees (Tier 1 and Tier 2)	At start of employment (or if already employed at ordinance's effective date)	After 180 calendar days of employment	40 hours/year: employers with 4-49 FTE's  56 hours/year: employers with Businesses with 50-250 FTE's  72 hours/year (or up to 108 hours/year if the employer has a universal paid time off policy):	Yes up to yearly caps	Combined or universal leave (PTO) policies are permitted provided they comply with the underlying sick time ordinance  Per ordinance: <u>Tier 1 and 2 employers</u> <ul style="list-style-type: none"> <li>Must be able to use time for the same purpose</li> <li>Must accrue time at a rate consistent with policy</li> <li>Cannot limit use of time to less than allowed in policy</li> <li>Must allow for carryover</li> </ul> <u>Tier 3</u> Same as above, with provision that

## Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline

Jurisdiction	Scope: covered employers	Scope: covered employees (hours threshold) [exclusions]	Usage: Used beyond self?	Usage: what can it be used for	Usage: documentation	Usage: increments	Usage: how counted (accrual rate)	Usage: accrual start	Usage: when able to access	Usage: cap on hours	Accrual: carryover	Usage: relationship to PTO
		and Tier 2)			Where employer offers health ins., employer/ye each pay \$50% of cost for documentation; if employee declined health ins., not entitled to reimbursement	standards  For FLSA exempt public employees, time must be used in accordance with pay system established by statute, ordinance or regulation				employers with 250+ FTE's		must allow for up to 108 hours for both use and carryover
WA - Tacoma	All except fed govt., state, county local governments and single person businesses	Employees employed in the city who work 80 hours/year  Excludes: <ul style="list-style-type: none"> <li>• Work-study</li> <li>• Students</li> <li>• Independent Contractors</li> <li>• Govt. employees</li> </ul>	Includes children; parents; grandparents; spouses; domestic partners (local or state registries)	Physical/mental illness, injury or condition  Safe time: yes (both employee and family members)	Does not specify other than to say an employer may require an employee comply with the employer's usual and customary requirements	Employers may require a minimum use time subject to FLSA  If none established, same as Seattle above	1 hour for every 40 hours worked	At start of employment (or if already employed at ordinance's effective date)  Though not required, employer <u>may</u> allow for "front loading" in advance of accrual	After 180 calendar days of employment	24 hours/year	Yes up to yearly caps	Compliance can be achieved if an employer offers PTO sufficient to meet or exceed accrual requirement of ordinance  Per ordinance: <ul style="list-style-type: none"> <li>• Must be able to use time for the same purpose</li> <li>• Must accrue time at same rate</li> <li>• Use of leave is limited to no less than 24 hours/year</li> <li>• PTO is approved by the [Finance] Director and is consistent with the rules and regulations promulgated by the Director</li> </ul>
MN - Minneapolis (city employees)	City as employer	All city employees except temporary, intermittent employees and those in outside trades (though the city contributes to these union plans and the union plans in turn provide benefits).	Includes child, spouse, sibling, parent (and in-laws), grandchild, grandparent, guardian, ward, members of employees household, and registered domestic partner.	Physical/mental illness, injury or condition and qualified treatment for chemical dependency; safety leave as defined by state law is included	Employer may require documentation if: <ul style="list-style-type: none"> <li>• Absent for more than 5 consecutive days or</li> <li>• Has used more than 12 days of unverified sick leave within the last 12 months or</li> <li>• Where there is suspected fraudulent use or</li> <li>• Where there are patterned absences</li> </ul>	Non-exempt FLSA employees allowed to use sick leave in partial increments  Exempt FLSA employees can use partial time, in accordance with FLSA standards, unless labor agreement specifies otherwise  Smallest amount of time tracked in payroll system is 15 minutes	1 day per calendar month worked	Generally, at start of employment	Unless otherwise specified in labor agreement, employees can use sick time as soon as it is accrued	12 days/year	Yes – no cap	NA

Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline – Compliance, Monitoring and Enforcement

Jurisdiction	Enforced By	Compliance: education/ outreach	Compliance: complaint based vs. proactive	Compliance: protections	Staff	Notice & Recordkeeping	Private right of action	Implementation Notes
CA - state	California Division of Labor Standards Enforcement in the Department of Industrial Relations	DLSE website has a webinar and slides to help employers understand how to comply.	Complaint driven	Expressly prohibits retaliation		<p><b>Notice:</b> employer must display poster with specific requirements (available on Labor Commissioner’s website)</p> <p><b>Individual notice:</b> After Jan. 1, 2015, must provide individualized Notice to Employee (except to exempt employees, govt. employees and those covered by a n applicable CBA). This includes employees hired before Jan. 1, 2015 even if existing policies meet min requirements of new law. Also requires amount of remaining leave to be visible on pay stub.</p> <p><b>Record keeping:</b> Employers must retain records for 3 years.</p>	No, but the State Labor Commissioner or Attorney General may bring a civil action in Court against an employer or person violating the article.	The sick leave and minimum wage ordinance may be waived, except to the extent required by law, in a bona fide collective bargaining agreement.
CA - San Francisco	Office of Labor Standards Enforcement under the City Administrator		Complaint driven	Expressly prohibits retaliation	5.5 FTEs enforce minimum wage and sick time ordinances	<p><b>Notice:</b> every employer must post in a conspicuous place at any workplace or job site where any employee works required notice, and must be posted in English, Spanish, Chinese, and any language spoken by at least 5% of the employees at the workplace or job site.</p> <p><b>Record keeping:</b> Employers must retain records for 4 years.</p>	Yes	<p>San Francisco Office of Labor Standards Enforcement created a comparison for employers to understand the differences between the San Francisco ordinance and the state law.</p> <p>Their office averages around 60 minimum wage cases per year, and 25 sick time cases. This does not include other reports that are not necessarily substantiated.</p> <p>Helpful to have an employee involved in the investigation (third party complaints are allowed).</p> <p>More than half of the workers who file a complaint do not speak English as a first language. Most compliance officers are bilingual.</p> <p>Law applies to undocumented workers as well.</p> <p>Population: 852,469</p>
CA – Emeryville	City of Emeryville	Provides online list of links to employer tools and resources.	Complaint driven	Retaliation expressly prohibited	1 FTE who also enforces other issues like minimum wage	<p><b>Notice:</b> Posting in of rights shall be posted prominently in areas of the worksite where all employees can see.</p> <p><b>Individual notice:</b> Employers must provide written notification to each employee at time of hire, in such languages as necessary.</p> <p><b>Record keeping:</b> Employers must maintain a record for 3 years.</p>	Yes	<p>The sick leave and minimum wage ordinance may be waived, except to the extent required by law, in a bona fide collective bargaining agreement.</p> <p>Population: 11,227 (with only 1,100 businesses)</p> <p>Prior to the ordinance going into effect, they conducted proactive outreach to businesses and the general public to help inform them of the ordinance and what the requirements were for compliance. This included public meetings with presentations and Q &amp; A as well as mass mailings. They are in the process of developing forms and FAQs.</p>
CA – Oakland	City of Oakland	Provides online list of links to employer tools and resources.	Complaint driven	Retaliation expressly prohibited		<p><b>Notice:</b> Must prominently display in areas of the worksite and accessible to all employees, and must be displayed in all languages spoken by more than 10 percent of employees</p> <p><b>Individual notice:</b> Employers must provide individual written notice at time of hire</p> <p><b>Record keeping:</b> Employers must maintain a record for 3 years.</p>	Yes	<p>The city may use an employer’s record of non-compliance with the ordinance when considering awarding contracts, land use approvals, or other entitlements to expand or operate within the City, and may deny requests on that basis.</p> <p>Population: 413,775</p>
CT - state	Dept. of Labor		Complaint driven	Retaliation expressly prohibited		<p><b>Notice:</b> At time of hire, must inform employee of sick leave benefit and terms, policy against retaliation, and that the employee has right to file a complaint with DOL. Employers can comply with above by displaying poster in English/Spanish as required.</p>	No	

**Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline – Compliance, Monitoring and Enforcement**

Jurisdiction	Enforced By	Compliance: education/ outreach	Compliance: complaint based vs. proactive	Compliance: protections	Staff	Notice & Recordkeeping	Private right of action	Implementation Notes
DC – Washington	Dept. of Employment Services		Complaint driven	Retaliation expressly prohibited		<p><b>Notice:</b> Employers must place in a conspicuous place, in all languages spoken by eligible employees with limited or no-English proficiency</p> <p><b>Record keeping:</b> Employers must retain records for 3 years.</p>	Yes	<p>According to the City Auditors Report from 2013, 50% of businesses provided paid sick pre-ordinance:</p> <ul style="list-style-type: none"> <li>87.5% of surveyed businesses said the requirement to provide paid sick time would not cause them to move their business to another jurisdiction</li> <li>Data from a survey in the 2015 City Auditor’s Report showed that only 1 in 10 businesses surveyed stated that paid sick and safe leave hurt their profitability, while more than half of respondents said it had either no effect or a positive effect on profitability</li> </ul> <p>Population: 658,893</p>
MD - Montgomery County	Office of Human Rights		Complaint driven	Retaliation expressly prohibited	Currently has 5 FTEs (1 manager, 4 investigators) for all anti-discrimination and other labor-related law related work. No additional FTEs for sick time, though they’ve asked for 1-3 employees to be added to help with sick law, and other laws that have been added to their department in recent years with no increase in staff to enforce	<p><b>Notice:</b> Employer must provide notice to all employees, but <u>may</u> provide notice by:</p> <ol style="list-style-type: none"> <li>Display in conspicuous and accessible areas in the work locations,</li> <li>Including the model notice in the employee handbook or written notice distributed individually to all employees, or</li> <li>Provided to employees at time of hire.</li> </ol> <p><b>Record keeping:</b> Employers must retain records for 3 years</p>	unclear	<p>Parties subject to collective bargaining agreements are exempt so long as the parties both expressly waived the coverage in clear and unambiguous terms in the agreement.</p> <p>Sick law is new, and the agency is in the process of implementing.</p> <p>Population: 1M</p>
NJ - Bloomfield	Dept. of Health and Human Services		Complaint driven, though the agency has authority to access employer records to ascertain compliance	Retaliation expressly prohibited	Per their own estimate, they believe staff enforcing this ordinance only would = 1.5 FTE.  In total, they have 27 staff, 14 of which are full-time, but no one is particularly dedicated to enforcing sick time alone as they cover many different issues.	<p><b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer’s workforce</p> <p><b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer’s workforce</p> <p><b>Record keeping:</b> Employer must maintain adequate records documenting hours worked by an employee and paid sick time taken by an employee</p>	Yes	<p>Parties subject to collective bargaining agreements are exempt so long as the parties both expressly waived the coverage in clear and unambiguous terms in the agreement.</p> <p>Population of 47,929</p>
NJ - East Orange	Dept. of		Complaint	Retaliation		<p><b>Notice:</b> Employers must display a poster in a spot</p>	Yes	Parties subject to collective bargaining agreements are exempt so long as the parties both

**Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline – Compliance, Monitoring and Enforcement**

Jurisdiction	Enforced By	Compliance: education/ outreach	Compliance: complaint based vs. proactive	Compliance: protections	Staff	Notice & Recordkeeping	Private right of action	Implementation Notes
	Health and Human Services		driven, though the agency has authority to access employer records to ascertain compliance	expressly prohibited		conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer’s workforce  <b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer’s workforce  <b>Record keeping:</b> Employer must maintain adequate records documenting hours worked by an employee and paid sick time taken by an employee		expressly waived the coverage in clear and unambiguous terms in the agreement.  Population: 65,078
NJ - Elizabeth	Department of Health and Human Services				Ordinance goes into effect on March 1 – have not added staff to enforce. Will consider if demand exceeds staff capacity.			They offered to provide data at a future date (three to six months from now) in case they have additional insight to provide.  Population: 128,705
NJ - Irvington	Dept. of Neighborhood Services		Complaint driven, but agency has broad authority to ensure compliance	Retaliation expressly prohibited		<b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer’s workforce  <b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer’s workforce  <b>Record keeping:</b> Employer must maintain adequate records documenting hours worked by an employee and paid sick time taken by an employee	Yes	Parties subject to collective bargaining agreements are exempt so long as the parties both expressly waived the coverage in clear and unambiguous terms in the agreement.  Population: 54,512
NJ - Jersey City	Dept. of Health and Human Services	Online FAQ available in English, Arabic, Chinese, Hindi, Spanish, Tagalog	Complaint driven, but may also “engage in pro-active” enforcement... through the use of audits, on-site investigations, or other measures to ensure employer’s compliance.”	Retaliation expressly prohibited		<b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer’s workforce  <b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer’s workforce  <b>Record keeping:</b> Employer must maintain records for 3 years.	Yes	Jersey City ordinance required a research study to measure the economic impact on business and the health of residents, beginning 1 year from the effective date of the chapter. The Center for Women and Work at Rutgers University found: 1) 80 percent of businesses were in compliance of the law; 2) 42 percent of respondents that changed their policies after the mandate reported that business was better, including lower turnover in staff, higher quality recruits, and some increases in productivity  Population: 262,146
NJ - Montclair	Dept. of Health and Human Services		Complaint driven, though DHHS has	Retaliation expressly prohibited		<b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer’s	Yes	Parties subject to collective bargaining agreements are exempt so long as the parties both expressly waived the coverage in clear and unambiguous terms in the agreement.

Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline – Compliance, Monitoring and Enforcement

Jurisdiction	Enforced By	Compliance: education/ outreach	Compliance: complaint based vs. proactive	Compliance: protections	Staff	Notice & Recordkeeping	Private right of action	Implementation Notes
	Services		broad powers to ensure compliance			workforce  <b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer’s workforce  <b>Record keeping:</b> Employer must maintain adequate records documenting hours worked by an employee and paid sick time taken by an employee		Population: 38,142
NJ - Newark	Dept. of Child and Family Well-being		Complaint driven, but agency has broad authority to ensure compliance	Retaliation expressly prohibited		<b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer’s workforce  <b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer’s workforce  <b>Record keeping:</b> Employer must maintain adequate records documenting hours worked by an employee and paid sick time taken by an employee	Yes	Parties subject to collective bargaining agreements are exempt so long as the parties both expressly waived the coverage in clear and unambiguous terms in the agreement.  Population: 280,579
NJ - Passaic	Dept. of Health and Human Services		Complaint driven, but agency has broad authority to ensure compliance	Retaliation expressly prohibited		<b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer’s workforce  <b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer’s workforce  <b>Record keeping:</b> Employer must maintain adequate records documenting hours worked by an employee and paid sick time taken by an employee	Yes	Parties subject to collective bargaining agreements are exempt so long as the parties both expressly waived the coverage in clear and unambiguous terms in the agreement.  Population: 71,509
NJ - Paterson	Dept. of Health and Human Services		Complaint driven, but agency has broad authority to ensure compliance	Retaliation expressly prohibited	No one specifically added for this proposal. Currently 2 FTE working on this along with other issues.	<b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer’s workforce  <b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer’s workforce  <b>Record keeping:</b> Employer must maintain adequate records documenting hours worked by an employee and paid sick	Yes	Parties subject to collective bargaining agreements are exempt so long as the parties both expressly waived the coverage in clear and unambiguous terms in the agreement.  Population: 146,753

**Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline – Compliance, Monitoring and Enforcement**

Jurisdiction	Enforced By	Compliance: education/ outreach	Compliance: complaint based vs. proactive	Compliance: protections	Staff	Notice & Recordkeeping	Private right of action	Implementation Notes
						time taken by an employee		
NJ - Trenton	Dept. of Health and Human Services	FAQ and paid sick leave brochure available in English and Spanish online.	Complaint driven, but agency has broad authority to ensure compliance	Retaliation expressly prohibited	1 FTE (with someone to cover and answer questions if she can't be there). Manager is also responsible for other duties.	<p><b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer's workforce</p> <p><b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer's workforce</p> <p><b>Record keeping:</b> Employer must maintain adequate records documenting hours worked by an employee and paid sick time taken by an employee</p>	Yes	<p>Parties subject to collective bargaining agreements are exempt so long as the parties both expressly waived the coverage in clear and unambiguous terms in the agreement.</p> <p>Population: 84,034</p>
NY – New York City	Dept. of Consumer Affairs, Paid Sick Leave Division	Massive multimedia and multilingual campaign that included TV/ radio and public transit ads, literature in 25 languages and 820 community meetings and workshops	Complaint driven, but can be initiated by the department as well “if it has reason to believe that an employer's practices warrant investigation”	Retaliation expressly prohibited		<p><b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer's workforce</p> <p><b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in English and primary language of the employee provided the department has made available the notice in that language.</p> <p><b>Record keeping:</b> Employer must maintain records for 2 years, unless otherwise required by required by law or regulation.</p>	No	<p>Parties under a collective bargaining agreement are exempt if:</p> <ol style="list-style-type: none"> <li>1) parties have expressly waived such provisions in their collectively bargained contracts, <u>and</u></li> <li>2) such agreements provide comparable benefits for covered employees, including but not limited to, PTO, vacation days, personal time, sick time, or premium pay rate</li> </ol> <p>Population: 8.5M</p>
OR - Portland	City and the OR Bureau of Labor and Ind.	Mandated outreach program	Complaint driven	Retaliation expressly prohibited		<p><b>Notice:</b> Employers must display a poster in a spot conspicuous and accessible to all employees in English or any other language spoken by 10 percent of the employer's workforce</p> <p><b>Individual Notice:</b> Employers must provide written notice at time of hire, or if already employed, as soon as possible, in the primary language of the employee so long as the language is spoken by 10 percent of the employer's workforce</p> <p><b>Record keeping:</b> Employer must maintain records for 2 years.</p>	Yes	Population: 619,360
OR - state	Bureau of Labor and Industries	Oregon Statewide Sick Time seminars. Technical assistance hotline.	Complaint driven	Retaliation expressly prohibited		<p><b>Notice:</b> Employer shall provide written notice of the Act to each employee, Administrative rules provide that this notification can personal written notice to employee, incorporating the written notice into a handbook, or posting in in a conspicuous location in the workplace.</p> <p><b>Individual Notice:</b> Employer shall provide quarterly written notification on the amount of accrued and unused sick time available for use. Notices must be provided in language the</p>	Yes	

**Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline – Compliance, Monitoring and Enforcement**

Jurisdiction	Enforced By	Compliance: education/ outreach	Compliance: complaint based vs. proactive	Compliance: protections	Staff	Notice & Recordkeeping	Private right of action	Implementation Notes
						<p>employer typically uses to communicate with the employee.</p> <p><b>Record keeping:</b> Health information of an employee related to sick time is confidential and cannot be released without employee permission.</p>		
PA – Philadelphia	Managing Director’s Office	Mandated multilingual outreach program that includes notices to childcare and elder care providers, domestic violence shelters, schools, hospitals, community health centers and other health providers	Complaint driven	Retaliation expressly prohibited.		<p><b>Notice:</b> can be public posters or individualized notice, <u>and</u> must be in employee handbook. Must be in English and any other primary language spoken by at least 5% of workplace employees.</p> <p><b>Record keeping:</b> Employers must retain records for 2 years.</p>	Yes, but after receipt of final decision from agency or 180 days after filing a complaint	<p>The sick leave and minimum wage ordinance may be waived, except to the extent required by law, in a bona fide collective bargaining agreement.</p> <p>Population: 1.5M</p>
WA - Seattle	Office for Civil Rights		Complaint driven	Retaliation expressly prohibited.	Seven employees who enforce sick ordinance and other workplace ordinances.	<p><b>Notice:</b> employers are required to provide notice to all employees who work in Seattle. Notice must be conspicuous and accessible. &amp; physical and/or electronic</p> <p><b>Individual Notification:</b> Employers must provide notification of available sick time each time wages are paid (by paystub and/or online)</p> <p><b>Record keeping:</b> Employers must retain records for two years that indicate:</p> <ul style="list-style-type: none"> <li>• Employee hours worked in Seattle.</li> <li>• Accrued sick time by employee.</li> <li>• Use of sick time by employee.</li> </ul>	No	<p>A two-year exemption was provided for new small and medium sized employers (more than four employees up to 49 employees, and more than 49 employees to 249 employees, respectively).</p> <p>Interview with Senior Policy Analyst in Seattle’s Office of Labor Standards indicates that both enforcement and education are equally important and unending.</p> <p>When conducting an investigation based on a complaint, they will do a comprehensive review of all wage issues on site, as they often encounter multiple issues.</p> <p>Seattle budgeted \$250,000 for an evaluation of the sick and safe law, which will be conducted by the University of Washington’s Evans School of Public Affairs, and the Office of the City Auditor.</p> <p>Population: 662,400</p>
WA - Tacoma	City of Tacoma Finance Director	Paid advertising in newspapers, advertising incorporated into public transit. Social media campaign. Direct mail to businesses in the city limits.	Complaint driven	Retaliation expressly prohibited	Ordinance went into effect on Feb 1, 2016 and they have 2 staffers (program manager and a customer service rep). They have authority to hire 2 more analysts – one on Feb 29 and the other when	<p><b>Notice:</b> Employers may provide notice by:</p> <ol style="list-style-type: none"> <li>1) Posting the Notice in a conspicuous location accessible to all employees in each workplace;</li> <li>2) Including the notice in the employee handbook; or</li> <li>3) Providing each employee with a written copy of the notice (either tangible or electronic)</li> </ol> <p><b>Record keeping:</b> Employers must retain records for 3 years</p>	Yes	<p>Employer checklist to guide through compliance. Checklist available in English, Spanish, Korean, Russian, Cambodian, and Vietnamese. See checklist here: <a href="http://cms.cityoftacoma.org/Finance/paid-leave/PTO-Policy-Checklist.pdf">http://cms.cityoftacoma.org/Finance/paid-leave/PTO-Policy-Checklist.pdf</a></p> <p>Tacoma Outreach Log provides list of advertising and outreach efforts: <a href="http://www.enforcingsickdays.org/wp-content/uploads/2016/02/Tacoma-Outreach-Log1.pdf">http://www.enforcingsickdays.org/wp-content/uploads/2016/02/Tacoma-Outreach-Log1.pdf</a></p> <p>Tacoma staff sent this note following up on conversation with staff:                      “I attached a draft work plan that we used for implementation in case its [sic] helpful. We had one year between passage of the paid leave ordinance and implementation and just 2-3 months following the November elections to implement minimum wage. What we have learned so far is that having a well-organized website and a straight forward law (no tiers based on employer</p>

**Comparison of Paid Sick Time in US in relation to WPG Policy Decision Outline – Compliance, Monitoring and Enforcement**

Jurisdiction	Enforced By	Compliance: education/ outreach	Compliance: complaint based vs. proactive	Compliance: protections	Staff	Notice & Recordkeeping	Private right of action	Implementation Notes
		City-hosted employer information sessions. Employer Paid Time Off checklist. Online mapping tool to determine if business is in city limits.			caseload demands it.  Staff works on both sick leave and minim. Wage enforcement, though most complaints have been about sick time.			<p>size, etc.) has reduced the number of calls we have received greatly compared to implementation in other cities. Most callers with questions have found a majority of what they need on our website and are calling with questions regarding a specific workplace scenario. We still received 145 sick leave related inquiries in January and about 120 in December.”</p> <p>They will be conducting broader investigations (workplace wide or for an entire classification vs. individual investigations) for most complaints. Retaliation complaints will likely be handled on a case by case basis.</p> <p>The analysts coming on board may have recommendations on outreach/education, but it remains to be seen how much outreach and education they individually will have time for. They conducted significant outreach leading to the February 1 effective date.</p> <p>In addition to education and outreach, they had a public process to form rules that provide guidance for implementing the Ordinance. This included significant outreach as well as four public hearings.</p> <p>Population: 205,159</p>