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HR Focus

HUMAN RESOURCES NEWSLETTER WINTER 2015

Look for New Overtime Rules Next July

The U.S. Department of Labor intends to release new regulations on overtime for exempt and nonexempt employees in July 2016. The DOL proposes to raise the salary test from $23,660 per year ($455 per week) to approximately $50,440 ($970 per week). The DOL also proposes to index the salary test going forward.

The proposed rule will make many more employees eligible for overtime pay. According to the DOL, the proposed rule will extend overtime protections to nearly 5 million additional white collar workers. Virtually all employers, large and small, will be affected by this rule change and should evaluate whether positions currently classified as exempt will still qualify and, if not, what actions to take.

Times They Are A-Changin' for Independent Contractors

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So, I read this great article on *Forbes* online today. The article was written by Dan Schawbel who bills himself as a "millennial expert and workplace futurist," a cool title by the way, and is titled "10 Workplace Trends You'll See in 2016."[1] I've got to tell you, I like this guy's style. They're not workplace trends you may see – they're trends you will see. You have to admire his confidence. I liked the article so much I thought I would do the same thing. Only, I'm going to predict labor and employment law trends for 2016. And, because I'm not nearly as creative as Mr. Schawbel and I only get 800 words for this article, I'm only going to tell you about one trend you will see in 2016. How's that for confidence? So without further ado, that trend is ... I need a drum roll ...

INDEPENDENT CONTRACTORS ARE ABOUT TO BECOME AS COMMON AS THE DINOSAUR

In July of 2015, the Administrator for the Wage and Hour Division of the Department of Labor issued Administrator's Interpretation No. 2015-1. It was titled "The Application of the Fair Labor Standards Act's 'Suffer or Permit' Standard in the Identification of Employees Who Are Misclassified as Independent Contractors." Snoozer, right? But it's really important. It's 15 pages long and it clarifies the standards for when a worker is considered an independent contractor. Basically, in a highly simplified way, the Guidance says that if the worker is economically dependent on an employer, that worker is an employee. The Guidance gives a bunch of tests and examples, but it boils down to this: "Is that worker really in business for him or herself?" The Guidance concludes with, "In sum, most workers are employees under the FLSA's broad definitions." This doesn't look good for businesses that use a lot of independent contractors, does it? And that's not all.

Uber, that uber cool ridesharing company, is being sued in California for misclassifying its drivers as independent contractors. In *O'Connor v. Uber Technologies Inc.*, the judge recently certified a class action alleging that Uber drivers are employees whom Uber has improperly classified as independent contractors. And, in another California lawsuit, Uber competitor Lyft was recently denied summary judgment in a suit alleging similar misclassification issues.

The state of California is weighing in, too. In *Uber Tech., Inc. v. Berwick*, the California Labor Commission determined that Uber driver Barbra Berwick was an employee and not an independent contractor.

But all that is in California, and you are in the Midwest (at least you probably are if you are reading this). But, don't forget, the Guidance is from the Department of Labor, a federal agency, and two of the California cases are applying the FLSA, a federal statute, and that statute probably applies to you too (even if your business is not as hipster chic as Uber).

"So what do I do, Steve?" I can hear you saying. Here are a few golden nuggets of advice:

First, you have to get a handle on the scope of the problem. How many independent contractors do you use? What do you use them for? Where do you source them? And who are they?

Second, once you know who they are and what they are doing for you, let's look at whether or not you have a problem. Are they properly classified? Do they only work for you? Have they been working for you for a long time? Are they just handling a project and moving on, or are they in your building day in and day out?

And finally, if you do have a problem, how do you fix it? Luckily, you have some options: hire them as employees or send them to a temp agency.

So, here is a piece of advice. Before you do this analysis by yourself (or worse yet, hire a contractor to do it for you), any documents you or your consultant create will be discoverable if you get sued. On the other hand, communications between you and your lawyer, for the purpose of securing legal advice, are covered by the attorney-client privilege and documents produced by your lawyer may be covered by the work product doctrine. Please keep that in mind when you decide who to call.

[1] "10 Workplace Trends You'll See in 2016," posted November 1, 2015 http://www.forbes.com/sites/danschawbel/2015/11/01/10-workplace-trends-for-2016/

News Digests:

Employer Pays $1.7 Million Disability Discrimination Settlement

According to an EEOC press release, an Illinois-based employer will pay $1,700,000 to resolve a disability discrimination charge filed with the EEOC. The agreement results from an EEOC investigation which found reasonable cause to believe that the employer discriminated against individuals with disabilities by disciplining and discharging them according to its policies to issue attendance points for medical-related absences, not allowing intermittent leave as a reasonable accommodation and not allowing leave or an extension of leave as a reasonable accommodation.

Michigan Workers' Compensation Cost Survey

A recent report from the Workers' Compensation Research Institute shows Michigan's costs per workers' compensation claim were the lowest of the seventeen states studied. The survey, which included Indiana, Illinois and Wisconsin, analyzed total costs per claims involving greater than seven days of lost time. Michigan's costs averaged $28,513 per claim. The median claim expense was $39,220, with Louisiana showing a high of over $50,000 per claim.

Employee Interview Now a Part of MiOSHA Investigations

As part of an investigation by the Michigan Occupational Safety and Health Administration (MiOSHA), employee interviews may be conducted. On October 6, 2015, MiOSHA published an Agency Instruction regarding employee interviews. This Agency Instruction outlines the steps an investigator must complete when a person being interviewed by MiOSHA asks to have another person present during the interview. These steps include: (1) determining if the request by the employee was freely and voluntarily made, (2) based on the relationship between the individuals, determining if the person's presence will be permitted and (3) having the employee complete the MiOSHA Interview Notice of Rights and Consent Form. Employers who are involved in a MiOSHA investigation may want to review this Agency Instruction so they are prepared for any employee interviews that may take place.

Employer's Win Voided by National Labor Relations Board (NLRB) Due to Incomplete Voter Data

On October 16, 2015, a National Labor Relations Board (NLRB) Regional Director ruled that an employer failed to substantially comply with its obligation to produce all available personal email addresses and phone numbers of eligible voters in an NLRB representation election. The employer did provide all addresses and phone numbers in its HR database, but failed to check departmental databases that included the same information for additional employees. Even though 94% of the voters' phone numbers were provided, the failure to look at all internal databases meant the employer did not substantially comply with its obligation and the employer's election win, by a vote of 390-346, was voided. Danbury Hospital of the Western Connecticut Health Network, Case No. 01-RC-153086.

Recent ADA & FMLA Cases Underscore Challenges Associated with Obtaining Information

The White House has published a guide listing various resources and best practices for employers complying with disability protection laws. According to the guide, "It is designed to answer common questions raised by employers and to identify relevant resources for employers who want additional information on specific topics. The goal of this guide is to help employers implement commonsense solutions to ensure that people with disabilities, like all Americans, have the opportunity to obtain and succeed in good jobs and careers." https://www.whitehouse.gov/sites/default/files/docs/employing_people_with_disabilities_toolkit_february_3_2015_v4.pdf.

Rehiring Retirees Part 3: Using Temporary Staffing Agencies

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Employers pressed to fill immediate contingent workforce needs may be tempted to "lease" recently retired employees through a temporary service agency rather than rehire them directly. Although this solution appears practical on its face, employers run into serious legal pitfalls with this approach.

COMMON LAW EMPLOYER – DUAL EMPLOYMENT

An employee of a temporary staffing agency working on assignment with a recipient employer can be deemed the "common law" employee of both the recipient employer and the staffing agency. The IRS looks to who has the right to control and direct the individual – not only as to the result to be accomplished, but also to the details and means by which that result is accomplished. If the company is providing day-to-day direction in what the temporary worker does and how he or she does it, then the company could be deemed the common law employer of that individual. Because this test is largely subjective, the courts can interpret the same fact pattern a variety of ways.

The probability of an individual being classified as the recipient employer's employee increases significantly when the retired worker is placed back in the same workstation, performing substantially the same or similar duties as he or she did before retirement. This is a red flag with the IRS, DOL and state employment agencies. In the vast majority of cases reviewed by the IRS and DOL, they have re-characterized temporary staffing agency employees as the common law employees of the recipient employer.

Retirees working through temporary staffing agencies may also be able to sue the recipient employer directly. The end result of these lawsuits will depend on the provisions of the plan at issue and how the courts interpret those provisions. In some instances, temporary or leased employees can be excluded as a class. Employer sponsors should ensure that all employee benefit and fringe benefit plans include appropriate and clear exclusionary language. The plan should also grant to the plan administrator clear and unequivocal authority to interpret and apply the plan provisions. This language protects the plan in the event of a lawsuit – the court will then overturn the plan administrator's decision only if it is arbitrary and capricious.

RETIREMENT PLANS

Plan Payments May Not be Permitted

Retirement plans, such as 401(k) plans and pension plans, are not allowed to make in-service distributions except in narrow circumstances. Impermissible distributions destroy a plan's tax-qualified status. If a retiree working through an agency receives payments while legally considered an employee, the distributions may be impermissible. Even if the payment is made between the retirement date and date of hire with the agency, the retiree may be considered to have never terminated employment, because the employment relationship was not completely severed. The factors the IRS would consider to determine whether an employment relationship was severed include: how much time has elapsed between the separation of service and return to work, whether there was an arrangement for the retiree to return to work and whether the retiree received training while retired.

Retirees May Need to be Counted for Non-discrimination Testing

Retirees rehired through an agency may also have to be included in the plan's non-discriminatory coverage test if either:

(1) they are considered co-employees of the employer and the agency or

(2) they work on a substantially full-time basis with the employer and are under the employer's primary direction and control.

Large numbers of these employees can potentially skew testing results.

Agency Service May Need to be Counted

Finally, retirees working through agencies, but considered employees, are entitled

to have their agency service counted for retirement plan purposes.

This includes not only vesting, which is probably not an issue for retirees, but may also include benefit accruals, such as the right to make 401(k) deferrals and receive a match or to accrue a pension benefit, unless the plan has appropriate exclusions. If the plan has minimum hour requirements for counting service, the employer cannot manipulate hours to prevent the retiree from accumulating enough hours. This tactic would open the employer to claims under ERISA Section 510, which prohibits an employer from interfering with an employee's right to benefits under an ERISA-covered plan.

WELFARE PLANS

Most welfare plans are currently drafted to exclude temporary or leased employees from coverage. These blanket exclusions may be problematic under the Affordable Care Act (ACA) if those individuals are the common law employee of the employer and are working an average of 30 hours a week or more. If the temporary staffing agency worker is a common law employee of the recipient employer, it can cause serious problems with ACA compliance.

Are Small Employers Subject to Employer Responsibility Requirements?

A small employer that would not otherwise be subject to the employer responsibility provisions may find itself on the hook for substantial penalties if it does not appropriately include those temporary staffing agency workers in its calculations to determine whether it is offering coverage to enough workers.

For example, suppose that XYZ Company has 40 regular full-time workers and uses 30 full-time temporary workers. If XYZ counts only its regular full-time workers, it would conclude that it is not subject to the employer responsibility provisions and does not have to offer its workers health benefits. But, if XYZ has sufficient control over the day-to-day activities of the 30 temporary workers, XYZ may be the common law employer of those workers. If so, XYZ would have more than 50 full-time equivalent employees and would be subject to penalties in 2016 for failing to offer coverage to at least 95% of its full-time workforce. XYZ's penalty would be $2,000 times the number of its full-time employees, less 30, which translates into an $80,000 annual penalty.

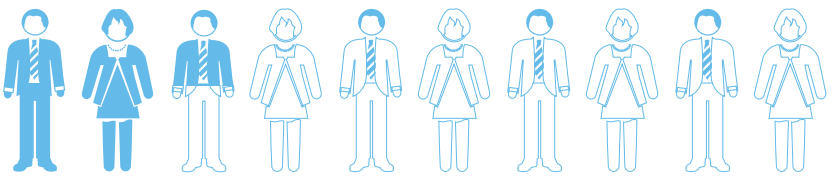
Determining Who Must be Offered Coverage

Larger employers already subject to the employer responsibility requirements may need to offer coverage to temporary staffing agency workers in order to hit the necessary target percentage under the employer responsibility requirements.

For example, ABC Company has 400 regular full-time employees, plus it uses an additional 15 full-time temporary workers. While it offers its regular full-time employees health plan benefits, ABC does not offer any benefits to the temporary workers. If ABC were the common law employer of the temporary workers, it would have to pay a $3,000 penalty for each one of the temporary workers who obtained subsidized coverage through the Health Insurance Marketplace. If all 15 obtained subsidized coverage, the penalty would be $45,000.

However, the impact can be even more significant. If ABC Company was the common law employer of 30 temporary workers, those workers would cause ABC Company to miss its 95% target under the employer responsibility provisions. This would mean that ABC would have to pay the penalty for failing to offer coverage ($2,000 times the number of full time employees less 30), which in this case would equal an $800,000 annual penalty!

Prediction: By 2020, employees 55 and older will make up 25% of the workforce.



Properly Structure Temporary Staffing Agency Contracts

Many employers using the services of temporary staffing agency workers don't even have a contract in place regarding those arrangements. Employers seeking to avoid these significant fines can reduce some of the risk by entering into clearly written contracts with the temporary staffing agency which provide the following:

1) The temporary staffing agency is the employer of record and is responsible for offering minimum essential coverage that meets both affordability and minimum value requirements to all employees providing services to the recipient employer within 90 days of the date they start working for the recipient employer;

2) The temporary staffing agency will timely comply with all ACA reporting requirements both to the government and the individuals; and

3) The temporary staffing agency will indemnify the recipient employer for any ACA penalties incurred as a result of utilizing their services. As explained in the ABC example above, the potential penalty is not based just on the number of temporary staffing agency employees but all workers deemed full-time.

An employer can reduce the risks of ACA penalties even further by taking advantage of the "deemed offer of coverage" rule, which allows a recipient employer to count the temporary staffing agency's offer of coverage as its own, provided that the temporary staffing agency charges a higher amount/rate for those employees which actually enroll in the temporary staffing agency's group health plan. IRS officials have been clear that a flat dollar charge for all employees (regardless of whether they enroll in the temporary staffing agency's plan) won't work. To date, the IRS has not provided any specific guidance as to the necessary amount of the additional fee, and it appears that a minimum amount (such as $1/month) may be sufficient to fall within these guidelines.

The Society for Human Resource Management (SHRM) found that organizations are unprepared for the aging workforce, with just over one-third of organizations examining policies and practices to address the demographic change.

Temporary Workers May Also Count for Non-discrimination Tests

As with retirement plans, if any of the temporary workers are deemed to be your common law employees, they will also have to be included in your non-discrimination testing. Large numbers of such employees could skew testing outcomes.

Evaluate Other Health and Welfare and Fringe Benefit Plans

As we previously reported in the last HR Focus newsletter, "Employing Retirees Part 2: Take Steps to Avoid Problems with Health & Welfare Plans," there are a range of pitfalls in rehiring retirees, such as losing the retiree-only exception under the ACA. Employers should review all existing active and retiree group health and welfare and fringe benefit plans and evaluate whether amendments are necessary for situations where retirees return to service via a temporary staffing agency.

Key Benefit Plan Limits For 2016

The IRS recently released its 2016 employee benefits limitations for retirement plans. The following chart lists common limitations relevant for many employers.

401(k), 403(b), 457(b), Pension, etc.	2016	2015	2014
Annual Compensation	$265,000	$265,000	$260,000
Elective Deferrals	18,000	18,000	17,500
Catch-up Contributions	6,000	6,000	5,500
Defined Contribution Limits	53,000	53,000	52,000
Defined Benefit Limits	210,000	210,000	210,000
HCE Threshold	120,000	120,000	115,000
Key Employee	170,000	170,000	170,000
ESOP Limits	1,070,000 210,000	1,070,000 210,000	1,050,000 210,000
IRA			
IRA Contribution Limit	$5,500	$5,500	$5,500
IRA Catch-up Contributions	1,000	1,000	1,000
IRA AGI Deduction Phase-Out Starting at			
Joint Return	$98,000	$98,000	$96,000
Single or Head of Household	61,000	61,000	60,000
SEP			
SEP Minimum Compensation	$600	$600	$550
SEP Maximum Contribution	53,000	53,000	52,000
SEP Maximum Compensation	265,000	265,000	260,000
SIMPLE Plans			
SIMPLE Maximum Contributions	$12,500	$12,500	$12,000
Catch-up Contributions	3,000	3,000	2,500
Other			
457 Elective Deferrals	$18,000	$18,000	$17,500
Control Employee (board member or officer)	105,000	105,000	105,000
Control Employee (compensation-based)	215,000	215,000	210,000
Taxable Wage Base	118,500	118,500	117,000
Health Plans			
Out-of-Pocket Maximums (Self-Only)[1 2]	$6,850	$6,600	$6,350
Out-of-Pocket Maximums (Other than Self-Only)[1 2]	13,700	13,200	12,700
Transitional Reinsurance Fee (per Covered Life)[3]	27	44	63
Health FSA Salary Reduction Cap[4]	2,550	2,550	2,500
Employer Shared Responsibility – 4980H(a) Failure to Offer Coverage[2 5]	2,000	2,000	2,000
Employer Shared Responsibility – 4980H(b) Failure to Offer Affordable, Minimum Value Coverage[2 5]	3,000	3,000	3,000

[1] These limits do not apply to grandfathered or retiree-only plans.
[2] These amounts are indexed to increase based on the average per capita premium for U.S. health insurance coverage from the prior calendar year. The Out-of-Pocket maximum limit for self-only coverage applies to all individuals (regardless of whether the individual is in self-only or another level of coverage). For example, a family plan with a $13,700 family Out-of-Pocket limit cannot have cost sharing exceeding $6,850 for an individual enrollee in the plan.
[3] These fees apply on a calendar year basis.
[4] These fees apply on a plan year basis and are indexed for CPI-U.
[5] These fees apply on a calendar year basis and are assessed monthly at 1/12 of the annual amount.

In addition, the Patient Protection and Affordable Care Act imposes a fee to help fund the Patient Centered Outcomes Research Institute (PCORI). For plans with years ending between Oct. 1, 2014, and Sept. 30, 2015, the PCORI fee is $2.08 per covered life. For plan years ending after Sept. 30, 2015, and before December 31, 2015, the PCORI fee is $2.17 per covered life. Future amounts will be subject to medical inflation.

Avoiding the Minefield of Pre-Employment Background Checks

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Every employer wants a safe, qualified and trustworthy workforce. Pre-employment background checks have traditionally helped employers achieve this objective. But under the Obama administration, government agencies have accelerated enforcement efforts regarding background check violations. Employers who conduct background checks must be sure of two things: first, that their information-gathering doesn't have a disproportionate effect on minority applicants; and second, that their information-gathering complies with the Fair Credit Reporting Act (FCRA).

AVOIDING DISPARATE IMPACT

Many policies put in place by employers are "facially neutral," meaning that, as written, the policy does not single out any particular group for discriminatory treatment. But, even a facially neutral policy (such as an employer's decision to run background checks on job applicants) may have an inadvertent disparate impact on minority applicants. Disparate impact means that a policy or practice has a disproportionate impact on a protected group. For example, requiring job applicants to be able to lift a certain weight may have a disparate impact on women. If the employer cannot show that there is a legitimate business necessity for the policy, the employer may face a legal challenge to its policy. Accordingly, employers must be careful that their policies don't disadvantage one group over another without a legitimate business reason. Examples of policies that are often challenged for disparate impact include physical strength requirements, minimum education requirements, pre-employment testing results and criminal background checks.

Recently, BMW paid a sizeable sum to settle claims involving background checks. BMW switched logistics contractors at a South Carolina production facility. After the switch, BMW required the new contractors to run background checks on all existing employees who wanted to continue working at the facility. As a result of these background checks, Black employees were disproportionately barred from continuing work at the facility. Approximately 80% of the incumbent workers who were disqualified as a result of these background checks were Black. The EEOC challenged the practice and BMW agreed to pay $1.6 million to settle the claims and to undergo training and reporting requirements to prevent similar issues from arising again.

But in *EEOC v. Freeman*, a federal appeals court chastised the EEOC for its overly aggressive pursuit of these types of cases. There, the EEOC brought suit against an employer who conducted criminal and credit history checks, alleging that both had a disparate impact because they disqualified Black applicants at a higher rate. The trial court disagreed, finding that the EEOC failed to show a statistical effect on Black applicants. On appeal, the appellate court held that the EEOC's reliance on unsound data and analysis rendered its conclusions about the employer untrustworthy. The appeals court also cautioned the EEOC against abusing its authority, noting that the agency could "face consequences" for continued overzealousness. Although the employer prevailed, it did so only after years of costly litigation.

To avoid a disparate impact claim, employers should take special care when basing employment decisions on factors learned through background checks. In short, if a background problem is more commonly found in people of a particular protected class (e.g., race, color, national origin, gender), even a facially neutral background check policy may prove problematic unless there is a legitimate business justification for the policy.

OBSERVING THE FAIR CREDIT REPORTING ACT

From its title alone, many employers assume the FCRA deals only with traditional credit checks. In reality, however, the FCRA covers much more. The FCRA places strict requirements on employers whenever a "consumer report" is obtained for employment purposes. Consumer reports include such things as educational histories, employment histories, driving records, criminal background checks and can even encompass reference checks if those checks are performed by a third party.

...Avoiding the Minefield

Many employers choose to use third-party vendors to perform background checks. Although there is nothing wrong with this approach, if a third-party vendor is used, the FCRA requires an employer to:

- Provide separate, advance written notice to the applicant or employee;
- Get the individual's authorization to obtain the information;
- Certify to the third-party vendor that the employer is in compliance with the FCRA;
- Provide a pre-adverse action notice and additional documentation to the individual before taking an adverse action (such as denying employment) based in whole or in part on the report;
- Give the individual reasonable time to correct or explain information in the report prior to implementing any adverse action; and
- Provide to the individual an adverse action notice containing specific information.

Failure to comply with the FCRA can expose employers to enforcement action by the government or a private cause of action by the applicant or employee. These violations arise even where the FCRA violation is purely technical. This year, Home Depot settled a class action lawsuit for $1.8 million for the technical FCRA violation of improperly including extraneous language in its background check authorization form. In September, Whole Foods paid a settlement of approximately $800,000 for a similar technical violation.

In short, FCRA compliance is complicated and employers must carefully navigate it to avoid liability. If you need help navigating the FCRA maze or evaluating your other hiring policies and procedures, please contact anyone in our Labor and Employment Law Practice Group.

A Few Background Check Best Practices to Consider

- Inform the applicant in advance of background checks.
- Disclose any third-party agency used.
- Disclose decisions made based on third-party reports.
- Apply the same standards to all applicants in the same job classification.
- Avoid categorically refusing to hire applicants with a criminal record.
- Consider whether "ban the box"* laws apply.
- Never ask about medical history.
- Don't make decisions that disadvantage one group of applicants based on status.
- Preserve collected information for at least one year.
- Dispose of collected records securely (by shredding, burning, etc.).
- Be sure to comply with state and local laws.

***Ban the Box**
Throughout the year, President Obama has called on employers to eliminate the criminal history question from job applications. As of today, 19 states have complied. Although Michigan has not yet followed suit, many county and city governments – including Detroit, Kalamazoo, Ann Arbor, East Lansing, Genesee County and Muskegon Country – have taken their own steps to "ban the box."

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