

## COVID 19

### Human Resources Q&A: (Updated 4/24/20)

#### **Q1. Do you have any predictions on when the payroll system will go into default/lockdown status? (Updated 4/24/20)**

A. Pay Period 7.

Note: Although still under the Mayor's Declaration of State of Emergency, the payroll system will be open to all departmental HR/Payroll staff beginning on April 24, 2020. Except as otherwise noted herein, payroll processing will return to normal for Pay Period 9.

All PYs submitted to Central Payroll for processing in Pay Period 9 must have appropriate departmental signature(s) of appointing authority indicating approval of the transaction.

#### **Q2. For new hires who are scheduled to start work during pay period 7 or after, how are those getting handled? (Modified 4/24/20)**

A. CSC will enter and verify personnel transactions for those who have currently been entered or who have been identified as COVID19-CRITICAL. (See CSC Information distribution of 3/18/20 and 3/23/20 for more specific information). COVID-19 Critical NEW Hires and Appointments must be identified as such in the comments section of the PP20 and will be actively working during the State of Emergency.

**Beginning Pay Period 9 (4/19/20)**, Departments/Division will resume responsibility for entering PP20's and submitting appropriate Hiring Justifications. Hiring will continue to only be for COVID critical positions.

#### **Q3. For regular terminations and late-entered retirements, how will they flow for pay after their last day? (Modified on 4/24/20)**

A. Terminations will be entered and verified by CSC. As long as terminations are received, entered and verified, TLP checks, including leave balances, will be paid as normal.

**Beginning Pay Period 9 (4/19/20)**, Departments/Division will resume responsibility for entering terminations.

Central Payroll will continue to prepare and input regular PY1 – sick leave hour roll down and PY2 – TLP sick payout. Departmental payroll staff should email PY adjustments to termination pay (e.g. prior period adjustments, city indebtedness, service credit/Kelly TLP adjustments) to Rebecca Cox in Central Payroll, as many of us will continue to work remotely.

**Q4. How will PTR be paid during the lockdown? (Modified on 4/24/20)**

- A. **Beginning Pay Period 9 (4/19/20)**, Departments/Division will resume responsibility for entering part time hours.

Part-time employees who have been designated as essential should continue working during the emergency as directed. They will be paid for time worked via the usual timesheet/timeclock procedure used by their department.

All essential PT employees who are working during the Declaration of Emergency will be paid each pay period for the hours they work.

The non-essential PT employees who have been asked to stay home will receive 20-40 hours of pay depending on their average hours worked over pay periods 3, 4, and 5 as follows:

- Those PT employees who worked 20-40 hours will be paid for 20 hours.
- Those PT employees who worked 41-80 hours will be paid for 40 hours.
- Those PT employees who worked less than 20 hours should be told that they may apply for unemployment.

If there are questions or concerns, contact [adelong@columbus.gov](mailto:adelong@columbus.gov) with the subject in an email, "PART-TIME PAY" so that it becomes a priority.

**Q5. How do we handle employees on short-term disability? (Modified on 4/24/20)**

- A. Dearborn will suspend payments to our members beginning 3/22/2020 to avoid double payment and the need to recoup funds later. Employees on short-term disability will be paid their standard default hours through payroll; therefore, the employee portion of OPERS contributions will be deducted and remitted to OPERS.

**Beginning Pay Period 9 (4/19/2020)**, Dearborn is resuming disability pay.

Any earned vacation accruals awarded to the employee during 3/22/20-4/19/20 will be recouped and adjusted through a PY. Submit these PYs to Central Payroll in Pay Period 9.

The HR reps have been notified of all transactions and have all current STD status.

Dearborn is still counting time, so if the 6 months has expired or the approved period has expired, the HR rep should have received a notice via email indicating confirmation of return to work.

**Q6. For people on PPL and PCL, will they be paid the 80 standard hours, and then we convert those hours upon the conclusion of the lockdown? (Modified 4/24/20)**

A. Yes beginning Pay Period 9.

**Q7. How should we pay employees that we send home for showing symptoms related to COVID-19? (Modified 4/14/20)**

A. Any leave taken for COVID-related reasons should be tracked, but will not be deducted from leave banks. See additional guidance on Q39.

**Q8. How should full-time employees be handled who marked off sick, advising their doctor told them to self-quarantine? (Modified 4/14/20)**

A. Employees should provide:  
(1.) The name of the government entity that issued the quarantine or isolation order to which the employee is subject, or  
(2.) The name of the health care provider who advised him or her to self-quarantine for COVID-19 related reasons

On or after April 1, employees should complete the *Emergency Paid Sick Leave Request* Form (See HR Intranet Page, under Forms). Divisions should continue to track all COVID related absences on a spreadsheet. If in compliance, the employee should be placed on administrative leave and given notification on the *Designation Notice* (Family Medical Leave Act) form (See HR Intranet Page, FMLA packet). See additional FMLA guidance on Q57.

**Q9. Beginning Pay Period 7, how will time be charged for essential employees? (Modified 4/24/20)**

A. Full-time employees will be paid 80 standard hours on default (platoon FF's will continue with 96 hour default). Essential part-time employees will be paid for time worked and documented via their timesheet for the period. We will not be recovering hours for time missed from work during pay period 7 and 8. Essential employees are obviously needed to perform their critical functions for the citizens. But, we want to encourage sick employees to stay home.

Beginning Pay Period 9, deductions will be made to the applicable banks for anyone who has been designated essential and is absent from work for a NON COVID related reasons.

**Q10. Beginning Pay Period 7, what should be done about overtime hours worked during this pay period? (Modified 4/24/20)**

- A. Overtime worked during Pay Period 7 was paid in Pay Period 8 by PY submitted to Central Payroll (per overtime guidance provided by Jenna Krywick on 4/9/20). Any overtime worked during Pay Period 7 AND Pay Period 8 that has not yet been submitted to Central Payroll, should be submitted via PY for Pay Period 9. Overtime worked in Pay Period 9 should be entered by departmental HR/payroll staff through the normal time and attendance process.

**Q11. How will employees who receive temporary total benefits be paid? (Modified 4/24/20)**

- A. BWC will continue to issue payments. Steps have been taken so employees will not receive double payment from the City.

**Beginning Pay Period 9 (4/19/20)**, Departments/Division will resume responsibility for entering temporary total benefits through payroll.

**Q12. Will PRI, step increases, or merit increases occur during the emergency? (Modified 4/24/20)**

- A. No, these will be processed after the emergency is completed. We also will not be processing any **requests for pay adjustments for equity, discretionary/merit or across-the-board actions.**

**Step increases due to employees in PP7 and PP8 will be processed retroactively beginning PP9. Step Increases for PP9 and later will be processed currently in the pay period for which they are effective.** Information and instruction on any retroactive payroll adjustments (PYS) will be provided to the Department's HR representative from CSC.

Pay adjustments are subject to the approval of the appointing authority.

**Q13. How should new hire insurance enrollment be handled? (Modified 4/24/20)**

- A. Completed enrollment forms and compensation reduction agreements should be scanned and emailed to Joni Vance (payroll) and Cressida Boley (Employee Benefits).

**Q14. If an employee appears ill, can a supervisor inquire about the nature of the employee's illness? (This answer has been modified from previous information)**

A. Yes. During this pandemic, a supervisor may ask an employee if they are experiencing symptoms of the pandemic virus. For COVID-19, these include symptoms such as fever, chills, cough, shortness of breath, or sore throat. The supervisor must maintain all information about employee illness as a confidential medical record, but should report this information to their Human Resources Officer immediately.

**Q15. When a sick employee, or an employee in quarantine or isolation returns to work, can the employee be required to provide a doctors' notes certifying their fitness for duty?**

A. Yes. Such inquiries are permitted. But as a practical matter, doctors and other health care professionals will likely be too busy during and immediately after a pandemic outbreak to provide fitness-for-duty or return to work documentation. Therefore, new approaches may be necessary, such as reliance on local clinics to provide a form, a stamp, or an e-mail to certify that an individual does not have the pandemic virus.

**Q16. Did the City suspend its Drug and Alcohol Testing Program?**

A. No. The City will continue to administer its Drug and Alcohol Testing Program. WorkHealth has implemented procedures for increased sanitation and social distancing at each of its clinics in accordance with new state and local public health mandates.

**Q17. Is there a limit to the amount of time that can be taken by an essential employee and not deducted? (Modified 4/24/20)**

A. COVID related absences should be based on guidance or medical documentation.

**Beginning pay period 9**, all NON-COVID absences for essential employees should be based on the appropriate collective bargaining agreements, subject to appointing authority approval

**Q18. How will the contractual sick leave incentive/reciprocity programs be impacted?**

A. It is unclear at this time. It is an issue that will need to be discussed with the respective bargaining units. However, we want sick employees to stay home. So there is no intention to penalize employees for complying with this directive.

**Q19. Will MCP employees be receiving an ATB (cost of living increase) in pay period 7?**

A. No. CSC is planning on processing 28 PP20-PPC transactions as a result of the MCP pay table change effective 3/22/20. This transaction simply moves these 28 employees to pay grade minimum.

**Q20. Will CSC still process temporary appointments in the event of a need related to COVID 19?**

A. CSC has provided specific guidance on this issue. Anyone who has a critical position should call Tammy Rollins ahead of time to ensure temporary employment eligibility.

**Q21. Will CSC be processing promotional appointments?**

A. No. They want to do everything possible to meet the needs of the department, but we need to make sure that the priority positions are the taken care of first.

**Q22. How will employees on disability, who may have already received payment for this time period, be handled? (Modified 4/21/20)**

A. We have identified the overpaid members and know exactly how many (M-F) calendar days they were overpaid as of March 21, 2020. A process to address those individuals was developed and communicated by the Employee Benefits and Wellness group.

**Q23. Will Dearborn be processing new disability applications? (Modified 4/21/20)**

A. Dearborn will continue to adjudicate claims received by their office. As of Monday 3/23/20, Dearborn was working remotely, but did not foresee an issue with continued processing to keep the claims as current as possible. Dearborn will stay in contact with all claimants during this period. Dearborn will still be communicating as normal with the HR personnel on the status of the claims and receipt of new claims. Employee Benefits and Wellness will receive weekly status reports as well. Communication went out from Dearborn explaining the current situation and how payments for approved claims would work until the City resumes normal operations. Notice of overpayments were also sent to employees. Dearborn is responsible for collecting overpayments.

**Q24. Can essential employees take bereavement leave or other types of discretionary leave? (Modified 4/24/20)**

A. Employees are able to use bereavement leave. This leave should be tracked and charged by departments **beginning pay period 9**. There is no prohibition on allowing employees time off for reasons other than sick during this time period. All time off is at the Appointing Authority's discretion, balancing the operational need of the City.

**Q25. What medical documentation should be received for a quarantine?**

- A. Allow anyone that has been asked to quarantine (for self or others) to be off. Sick leave will not be charged, so they will continue to get 80 hours regular pay. We want those folks to stay away until the all clear is given to protect themselves and others. You are *permitted* to ask for some type of documentation if someone is being released back to work from a quarantine. But it is becoming apparent that documentation will be scarce and may not exist for self/mandatory quarantine releases. Frankly, an employee may only receive a phone call at this point. If no documentation exists, I would inquire with the employee about why/how the employee has been released from self/mandatory quarantine so you can at least document it yourself, and if necessary, to confirm that information (not required, but use your judgement in that situation).

**Q26. What should I be documenting during this time period? (Modified 4/14/20)**

- A. Your appointing authorities should have communicated that it is important to document any costs, including personnel costs, associated with COVID-related activity. You should also be documenting your compliance with FFCRA, specifically the Emergency Family Medical Leave Expansion Act (EFMLEA). Track time off using a spreadsheet (see sample spreadsheet sent from Chris Moses on 4/6/20) and *the Emergency Paid Sick Leave Request* form (e-mailed by Brooke Carnevale on 4/12/20 and located on the HR Intranet page under forms).

**Q27. What differentials will be paid from the payroll system for default hours? (Modified 4/24/20)**

- A. Any differential that is tied to the shift code will be paid as it existed during pay period 6. Specifically, shift differential and paramedic differential will be paid. Any adjustments made to shifts will be handled retroactively based on the specific collective bargaining agreements.

Departments should submit PY1s to Central Payroll in Pay Period 9 for any differentials that need to be paid or adjusted if they were not already captured in Pay Periods 7 or 8.

**Q28. How will injury leave be handled? (Modified 4/24/20)**

- A. Injury leave claims should be processed through the Department of Human Resources as normal. Payroll adjustments for approved claims can be submitted to Central Payroll beginning in Pay Period 9.

**Q29. How will military leave be handled? (Modified 4/24/20)**

- A. After the 22 days paid by the City, the remainder of the leave is not pensionable. Mary Raphael would like to continue to manually enter these leaves. Send these hours to Mary for entry.

Beginning for Pay Period 9, military leave will entered by the departments.

**Q30. How will employees who were in an AWOL status prior to pay period 7 be handled? (Modified 4/24/20)**

- A. If an employee had been AWOL and will have 80 hours of AWOL for pay period 7 (typically due to waiting on TT), communicate with Mary Raphael. There are approximately 10 employee who were in this AWOL status before Declaration of State of Emergency.

Beginning for Pay Period 9, AWOL employee hours will adjusted by the departments.

**Q31. If a non-essential employee is on probation during the Mayor’s State of Emergency Declaration (or during a pandemic) will their probationary period be extended once the emergency declaration is lifted?**

- A. Should the Mayor’s Declaration of Emergency exceed 30 days and the employee has not been working during these 30 days or longer, the Appointing Authority at his/her discretion could request to extend the probationary period in accordance with Civil Service Rules.

**Q32. When should employees return to work following a reported illness? (This answer was modified on 3/30/20 – This response modifies all previously issued guidance, including the Workplace Policy)**

- A. Actively encourage sick employees to stay home until they are free of fever (without the use of medication) for at least 72 hours (three full days) AND symptoms have improved for at least 72 hours AND at least seven days have passed since symptoms first began. Do not require a healthcare provider’s note to validate the illness or return to work of employees sick with acute respiratory illness; healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely way.

**Q33. How is the City handling Tuition Reimbursement? (Modified 4/24/20)**

- A. The City is not processing any new applications for tuition reimbursement until the Declaration of Emergency is over. Employees may continue to submit final grades for completed and approved courses. However, reimbursement for completed courses will be processed and paid only after the Declaration of Emergency is over.

Beginning for Pay Period 9, tuition reimbursement submitted with the approval of the appointing authority will be processed by Central Payroll.

**Q34. What if someone we need to pay is not listed on the spreadsheet? (Modified 4/24/20)**

- A. If you have a “missing” employee, please contact Beth Bailey as soon as possible so we can determine the status of the employee.

Departments no longer need to send spreadsheets to CSC. Part time hours will be entered by the department effective pay period 9.

**Q35. What if someone is listed on the report that no longer works for us? (Modified 4/24/20)**

- A. If it has been determined the listed employee has not worked this pay period and will no longer work for the department (they have resigned, etc.), enter “0” in Column N and prepare and submit a PP53 termination for the employee to Beth Bailey at the Commission.

Departments no longer need to send spreadsheets to CSC. Part time hours will be entered by the department effective pay period 9.

**Q36. What if someone we designated as “essential” did not work any hours this pay period? (Modified 4/24/20)**

- A. No problem, just enter a “0” in Column N. The employee will continue to show on future spreadsheets for subsequent pay periods.

Departments no longer need to send spreadsheets to CSC. Part time hours will be entered by the department effective pay period 9.

**Q37. What if someone we designated as “nonessential” ends up working during a pay period? (Modified 4/24/20)**

- A. No problem, all nonessential employees (except for seasonals) should already be on your spreadsheet. Should one of them have worked hours, just change the “0” in the PPHrs

column to the number of hours actually worked. If the employee is not listed, give Beth a call and she will advise you as to how to get them added.

Departments no longer need to send spreadsheets to CSC. Part time hours will be entered by the department effective pay period 9.

**Q38. Is there a need to go back and record hours for pay period 7?**

A. No.

**Q39. What are COVID-Related illnesses that do not require an employee to use their sick leave?**

A. COVID-19 related reasons include:

- When an employee calls off sick when they are unable to work (or unable to telework) because the employee:
  - is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
  - has been advised by a health care provider to self-quarantine related to COVID-19;
  - is experiencing COVID-19 symptoms and is seeking a medical diagnosis;
  - is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);
  - is caring for a child whose school or place of care is closed (or child care provider is unavailable) for reasons related to COVID-19; or
  - is experiencing any other substantially-similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretaries of Labor and Treasury.
- These reasons are to be liberally interpreted to be consistent with Public Health recommendations.
  - Please continue to encourage employees to stay at home if they are sick.
- High risk and/or particularly vulnerable employees that bring in medical documentation from a health care provider advising to self-quarantine shall be granted administrative leave.
  - **\*\*For now, this sick leave for these situations will not be charged to an employee's sick leave bank.**

**Q40. How should I charge the time for an employee who is off work because they have a high risk member in their household?**

A. An employee unable to work or telework but for a need to care for an individual, who is deemed “high risk” and/or “particularly vulnerable to COVID-19” with underlying health conditions, and that is advised by a health care provider to self-quarantine, shall be treated as a COVID-19 related reason and the employee shall be granted admin leave.

**Q41. If an employee invokes the following COVID-19 related reason: “I am caring for an individual who has been ordered to quarantine or isolate or has been advised by a health care provider to self-quarantine related to COVID-19” to what extent does the employee actually have to care for the individual to be eligible for leave?**

- A. The individual must depend on the employee for care during the quarantine or self-quarantine, and be unable to care for him or herself, and but for providing care, it prevents the employee from working and from teleworking. We would not suggest this kind of leave to be available for an employee to stay home with a vulnerable individual if that individual is capable of taking care of themselves. We suggest asking the following question if there are doubts: **Is the individual unable to care for him or herself, and do they depend on you for care to the extent that providing care prevents you from working and from teleworking?**

Refer to the *Emergency Paid Sick Leave Request* form. (Sent via e-mail from Brooke Carnevale on 4/12/20 and posted on the HR Intranet page, under Forms)

**Q42. What documentation should I be requiring to document a COVID-related absence?**

- A. An employee requesting sick leave for a COVID-19 related reason must provide:
- For self - Either (1) or (2)
    - (1.) The name of the government entity that issued the quarantine or isolation order to which the employee is subject, or
    - (2.) The name of the health care provider who advised him or her to self-quarantine for COVID-19 related reasons
  - For care for an individual - Either (1) or (2)
    - (1.) the government entity that issued the quarantine or isolation order to which the individual is subject or
    - (2.) the name of the health care provider who advised the individual to self-quarantine, depending on the precise reason for the request.
  - For care for his or her child - All of the following information:
    - (1.) the name of the child being care for;
    - (2.) the name of the school, place of care, or child care provider that closed or became unavailable due to COVID-19 reasons; and
    - (3.) a statement representing that no other suitable person is available to care for the child during the period of requested leave.

**Q43. Will the City be paying full wages, or reduced wages, provided in the FFCRA? (Modified 4/21/20)**

A. At this time, the City is paying the full wages for full time employees.

**Q44. Will time away from work for a COVID related absence count as hours worked for the purposes of calculating eligibility for overtime?**

A. Yes.

**Q45. If employees are working a reduced work schedule, how do I calculate overtime eligibility?**

A. Employees will not be eligible for overtime until they have worked (as defined by the appropriate contract) 40 hours.

**Q46. If an essential remote employee is sick or requests other time away from his/her duties, are the leave banks deducted?**

A. Yes, unless the employee is sick with a COVID-related reasons and is unable to work remotely due to the COVID-19 related reason.

**Q47. Are we required to track FFCRA leave for essential remote employees? (Modified 4/21/20)**

A. An essential employee that can remote/telework is not eligible for FFCRA.

An essential employee that is too sick to work because they have COVID-19, and thus cannot remote/telework, would be eligible.

The key is if they *can* remote/telework – they are not eligible and thus, as a general rule our essential remote employees won't be eligible. If those essential remotes somehow can't remote/telework, because they contract COVID-19 and are too sick, they would be eligible for FFCRA paid sick leave.

**Q48. Will any time be deducted for non-essential staff?**

A. Not at this time.

**Q49. When would an employee be eligible for leave under the FFCRA for a “substantially similar condition”?**

A. The U.S. Department of Health and Human Services (HHS) has not yet identified any “substantially similar condition” that would allow an employee to take paid sick leave. If HHS does identify any such condition, the Department of Labor will issue guidance explaining when you may take paid sick leave on the basis of a “substantially similar condition.”

**Q50. The form is dated April 1. For those employees who have been out since April 1, do they need to submit the form to get their time covered?**

A. It is important to track an employee’s time, since that tracking is not available on the payroll system. The *Emergency Paid Sick Leave Request* will be one piece of documentation you should get for any employee who is off for one of the stated reasons and for employees who prospectively request time off. You may go back to April 1 for the purposes of “counting” the time off, or you may start counting when the Emergency Paid Sick Leave Request is completed. The *U.S. Department of Labor, Designation Notice (Family and Medical Leave Act)* form should be used as the employee’s notice of approved/disapproved leave.

**Q51. Are reduced schedules permitted for parents who are home schooling their children full time in addition to full time work?**

A. Schedule changes are at the discretion of the Appointing Authority.

**Q52. We have essential employees who reported to work after schools shut down. After the FFCRA notice went out, we had several employees take off for child care. Can we ask for documentation on what’s changed?**

A. The Emergency Paid Sick Leave Request should be completed. FFCRA provides that an employee taking paid sick leave for child care issues or expanded FMLA for child care issues must provide: “1) the name of the child being cared for; 2) the name of the school, place of care, or child care provider that closed or became unavailable due to COVID-19 reasons; and 3) a statement representing that no other suitable person is available to care for the child during the period of requested leave.” While you can ask, as long as these requirements are satisfied, they should continue to be eligible.

**Q53. What if the employee exhausted/or exhausts their FMLA while out on an FFCRA leave?**

A. At this time, the employee may continue to be off for an approved reason.

**Q54. What if a COVID-related reason exceeds 80 hours of leave? Will the employee continue on administrative leave?**

A. Yes, as long as it has been appropriately documented and tracked.

**Q55. When an employee calls off on the basis that their health care provider (HCP) advised them to self-quarantine/isolate because they are particularly vulnerable to COVID-19, can the employer call the HCP to confirm that advice?**

A. No. An employer would not be permitted to ask the HCP for confirmation that they have been advised to self-quarantine/isolate and would not be permitted to require medical documentation or doctor's notes beyond what the FFCRA requires.

**Q56. When an employee calls off on the basis that their health care provider (HCP) advised them to self-quarantine/isolate because they are particularly vulnerable to COVID-19, can the employer offer additional protections like barriers, masks, gloves, internal social distancing, etc. as an accommodation in lieu of leave?**

A. No. The employee is entitled to the time off, despite the fact that the employer may be able to offer some arrangements that could permit an employee to continue to work.

**Q57. Do COVID-19 related reasons qualify for FMLA such that it counts toward the 12-month allotment?**

A. With the exception of the EFMLEA for childcare, it depends. An employee would still need to meet the requirements under FMLA qualify for it. So an analysis will still have to take place. This FFCRA paid sick leave is not a form of FMLA leave and therefore does not necessarily count toward the 12 workweeks in the 12-month period cap, absent a FMLA qualifying condition. Our normal protocol is to send FMLA paperwork after an employee is off for three days, which is still appropriate. However, just because someone is off on a COVID-19 related paid sick leave, doesn't mean they are incapacitated from a serious health condition. Employees who contracted COVID-19 but suffer only mild or no symptoms, will probably not be eligible for FMLA. On the other hand, employees that contract COVID-19 and experience serious symptoms and/or require inpatient care, including hospitalization, will probably be deemed to have a serious health condition under the FMLA.

**Q58. If an employee took previously scheduled/approved vacation during Pay Period 6 & 7, will those hours be adjusted/deducted? (Modified 4/24/20)**

A. Deduct any leave taken in PP6, but prior to March 19. Otherwise, March 19 through the end of PP8, time off will be administrative leave and will not be deducted from any leave banks.

Any adjustments to accruals for PP7 and PP8 submitted to Central Payroll in error will be returned to the departments.

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New Question (4/24/20)

**Q59. What if an employee has marked off work, presented medical documentation of a health condition that makes them high risk, but refuses to complete the Emergency Paid Sick Leave Request Form?**

- A. It is the employee's discretion to take the leave under the FFCRA. If the employee chooses not to fill out the *Emergency Paid Sick Leave Request* form, then they can use any other available leave they have. They still would need to fill out the usual City request for leave form so that the Departments can clearly track this and so that the employees know the time is coming out of their leave banks. The usual and customary requirements for requesting and taking leave should not be suspended, including (if normally appropriate) FMLA paper work after 3 days (our process in the CBA) and track it as FMLA if it doesn't come back. We would caution that before you would take action on someone because of a belief that they have exhausted FMLA for what could be considered COVID related reasons, that we have a review with the CAO.

An additional caution, these employees who have submitted documentation should clearly understand that their leave qualifies under the FFCRA, they are entitled to use that and the time won't be charged to their leave banks. If they understand that and still decide not to request the Leave under FFCRA, that is at their discretion. The Departments need to keep in mind that the employee would still be eligible to use this Paid Sick Leave benefit through the end of the year.