

# Eye on State and Local Compliance

Timely, topical insights on a variety of payroll and reporting issues.

July 23, 2025



## State/Territory/District

### Colorado Clarifies Protections for Gender Expression

Colorado has enacted legislation that clarifies the state's prohibition on discrimination based on an individual's gender expression. The clarification is a result of the enactment of House Bill 25-1312 and is **effective immediately**.

#### The Details:

By way of background, Colorado prohibits all employers from discriminating against applicants and employees based on their gender expression and certain other characteristics.

Before House Bill 25-1312, the definition of gender expression was an individual's way of reflecting and expressing their gender to the outside world, typically demonstrated through appearance, dress, and behavior.

House Bill 25-1312 expands the definition of gender expression to also include "chosen name" and "how the individual chooses to be addressed" as examples of gender expression.

Chosen name is defined as one that an individual requests to be known as in connection to their disability, race, creed, color, religion, sex, sexual orientation, gender identity, gender expression, marital status, familial status, national origin, or ancestry, so long as the name doesn't contain offensive language and the individual isn't requesting the name for frivolous purposes.

#### Next Steps:

- Review policies to determine if changes should be made.
- Train supervisors on the amended law.

### Maine Adopts Pay Requirement for Reporting to Work

Maine has enacted legislation that will require employers to pay employees for a certain amount of hours if they are asked to report to work and are sent home early. The change is a result of the enactment of Legislative Document 598 and takes effect on **September 24, 2025**.

## Topics covered in this issue:

### State/Territory/District

- Colorado Clarifies Protections for Gender Expression
- Maine Adopts Pay Requirement for Reporting to Work
- Maine Clarifies Carryover Under Paid Leave Law
- Minnesota Clarifies and Amends Paid Sick Leave Law
- Missouri Repeals Paid Sick Leave Law and Inflation-Based Annual Minimum Wage Increases
- Nebraska Amends Paid Sick Leave Requirements
- New Jersey Releases Pay Transparency Guidance
- New York State Increases Jury Duty Pay
- Oregon Clarifies Hiring Protections Related to Age
- Oregon Expands Lactation Protections
- Oregon Expands Paid Sick Leave to Include Blood Donation
- Rhode Island Enacts Menopause Protections
- Rhode Island Enacts Minimum Wage Legislation
- Vermont Expands Parental and Family Leave Act and Short-Term Family Leave
- Washington State Adds Immigration Status Protections
- Washington State Adds Leave for Victims of a Hate Crime
- Washington State Expands Paid Family Leave Act
- Washington State Increases Child Labor Protections
- Washington State Increases Safety Standards for Isolated Employees

### Local

- Los Angeles Hotel and Airport Worker Minimum Wage Put on Hold
- Pittsburgh Expands Paid Sick Leave Requirements

### Minimum Wage

- Minimum Wage Announcements 6/21/25 – 7/20/25

## **The Details:**

### **Coverage:**

Legislative Document 598 applies to any employer ([as defined here](#)) with at least 10 employees in the usual and regular course of business for more than 120 days in a calendar year.

The law doesn't apply to an employee ([as defined here](#)) in a seasonal industry, an employee of a public employer, or an employee who is covered by a collective bargaining agreement.

### **Pay for Reporting to Work:**

On any day an employee reports to work at the request of an employer and the employer cancels or reduces the number of hours in an employee's scheduled shift, the employee must be paid the lesser of:

- Two hours of pay at the employee's regular hourly rate of pay; or
- The total pay for the shift for which the employee was initially scheduled.

An employer that makes a documented good faith effort to notify an employee to not report to work isn't subject to the requirement.

If the employee reports to work after the employer's attempt to notify the employee was unsuccessful, or if the employer is prevented from notifying the employee, the employee must perform whatever duties the employer assigns when the employee reports to work, as long as the employee is physically able to perform those duties. In such a case, no pay for reporting to work would be required.

However, if the employer doesn't have any duties to assign to the employee, the employer must pay the employee the applicable pay for reporting to work.

### **Exceptions:**

The pay for reporting to work requirement also doesn't apply if an employee isn't required to work or is unable to work due to:

- Adverse weather conditions
- A natural disaster or civil emergency
- An illness or medical condition of the employee
- A workplace injury of the employee

### **Next Steps:**

Covered employers in Maine should ensure that they comply with the pay for reporting to work requirements when applicable.

## **Maine Clarifies Carryover Under Paid Leave Law**

Maine has enacted legislation that clarifies the rules for carrying over unused leave under the state's paid leave law. Legislative Document 55 takes effect on **September 24, 2025**.

### **The Details:**

#### **Background:**

By way of background, existing Maine law requires employers with 10 or more employees to provide paid leave that employees can use for any reason.

Under the law, an employee is entitled to earn one hour of paid leave for every 40 hours worked, up to 40 hours in one year of employment.

As enacted, the original law didn't address carryover of unused leave. However, the Maine Department of Labor (MDOL) subsequently issued a final rule that indicated that employees with accrued and unused paid leave at the end of the year are entitled to carry it over to the next year, up to a maximum of 40 hours.

The guidance further stated that for employees with hours of carried-over paid leave, the hours are only required to continue to accrue up to 40 hours in the current year of employment.

For example, if the employee carried over eight hours of this leave from 2023, the employee would have been only entitled to accrue 32 hours of this leave in 2024, according to the MDOL guidance. Consequently, an employee's paid leave balance would never exceed 40 hours in a single year.

### **Legislative Document 55:**

Legislative Document 55 increases the number of hours of leave an employee must be able to accumulate year-over-year. Specifically, the employee retains the right to carry over unused paid leave into the next year. However, carryover from the previous year will not reduce the total number of hours of paid leave an employee is entitled to accrue in the following year (40 hours).

For example, if the employee carries over eight hours of paid leave from 2025, the employee would still be entitled to accrue up to 40 hours of paid leave in 2026.

Consequently, an employee's paid leave balance may reach 80 hours. Keep in mind that employers may still limit use of paid leave to 40 hours in a year.

### **Next Steps:**

Maine employers should:

- Review policies and procedures to determine if changes should be made.
- Train supervisors on the amended law.
- Comply with the law by the applicable date.

## **Minnesota Clarifies and Amends Paid Sick Leave Law**

Minnesota has enacted legislation ([Senate File 17](#)), which clarifies and amends aspects of the state's paid sick leave law. Most amendment provisions took effect on **July 1, 2025** with one exception, which will take effect on January 1, 2026 as indicated below.

### **The Details:**

#### **Effective July 1, 2025:**

When an employee uses paid sick leave for more than two consecutive scheduled workdays, an employer may require reasonable documentation that the leave is covered by the law. Prior to the change, the employee was required to be absent for more than three consecutive scheduled workdays.

If the need for paid sick leave is unforeseeable, an employer may require an employee to give notice of the need for leave as soon as reasonably required by the employer. Prior to the change, an employer could require notice for unforeseeable leave "as soon as practical."

Under existing law, an employer may not require, as a condition of an employee using paid sick leave, that the employee seek or find a replacement. Senate File 17 makes clear that an employee isn't prohibited from voluntarily seeking or trading shifts with a replacement worker to cover the hours the employee uses paid sick leave.

#### **Effective January 1, 2026:**

Existing law states that employers aren't prohibited from advancing paid sick leave to an employee before accrual by the employee.

Senate File 17 amends the law to add that an employer is permitted to advance paid sick leave to an employee based on the number of hours the employer anticipates the employee will work for the remainder of the accrual year. If the employee works more hours than anticipated, the employer must provide additional paid sick leave to make up the difference between what was advanced and what should have been accrued based on actual hours worked.

### Next Steps:

Minnesota employers should:

- Review policies and procedures to determine if changes should be made.
- Train supervisors on the amended law.
- Comply with the law by the applicable date.

## Missouri Repeals Paid Sick Leave Law and Inflation-Based Annual Minimum Wage Increases

Missouri has enacted legislation (House Bill 567), which repeals the Missouri paid sick leave law and removes the minimum wage requirements that were set to take effect. House Bill 567 is effective **August 28, 2025**.

### The Details:

#### Background:

By way of background, Missouri voters had approved a ballot initiative, [Proposition A](#), which took effect on May 1, 2025, and required:

- All employers to provide paid sick leave to employees; and
- The state's minimum wage to increase in phases.

#### House Bill 567:

[House Bill 567](#) eliminates the paid sick leave requirements in Proposition A beginning

August 28, 2025, and only retains the following minimum wage increases:

- **January 1, 2025:** \$13.75 per hour
- **January 1, 2026:** \$15.00 per hour

**Note:** Employers must continue to meet all of the paid sick leave requirements through August 27, 2025.

### Next Steps:

Review and update sick leave policies and procedures. Employers that are leaning toward removing paid sick leave as a benefit should consider conferring with legal counsel.

## Nebraska Amends Paid Sick Leave Requirements

Nebraska has enacted legislation (LB415), which amends the Nebraska Healthy Workplaces and Families Act ("the Act"). The Act is effective **October 1, 2025**.

### The Details:

LB415 provides the following updates to the Act:

#### Covered Employers:

The definition of employer is changed to mean an employer that employs 11 or more employees (previously it was one or more employees). This means that employers with fewer than 11 employees do not have to provide paid sick leave.

The definition of a small business is changed to mean an employer with at least 11, but fewer than 20 employees (previously it was fewer than 20 employees).

The small business definition is significant because small businesses are required to provide accrual of at least 40 hours of paid sick time in a year. Businesses with 20 or more employees are required to provide accrual of at least 56 hours of paid sick time in a year.

## Counting Employees to Determine Coverage:

Recently updated [Frequently Asked Questions \(FAQs\)](#) from the Nebraska Department of Labor (NDOL) indicate that, “[f]or the purposes of determining business size, the Department will only include individuals that worked at least 80 hours of consecutive employment in the State of Nebraska for the out-of-state employer in a calendar year.”

## Covered Employees:

The law clarifies that the paid sick leave law does not apply to individual owner-operators, independent contractors, individuals employed in agricultural employment of a seasonal or other temporary nature, and individuals under 16 years of age.

## Credit for 2025 Paid Sick Time:

Under the law, leave that is provided to an employee on or after January 1, 2025, and before October 1, 2025, shall be counted toward an employer’s obligations under the Act for calendar year 2025.

## Accrual:

The law is updated to require paid sick leave accrual to begin after 80 hours of consecutive employment in Nebraska.

## Termination and Reinstatement:

Under the law:

- Employers are not required to pay an employee for unused paid sick time upon the employee’s separation from employment.
- Paid sick leave must be reinstated if it was not previously paid out to an employee who is terminated and then re-hired in 12 months.

## Existing Policies:

Employers with paid leave policies that meet or exceed the requirements of the Act (40 hours per year for small employers and 56 hours per year for large employers) are not required to allow employees to carry over unused sick leave benefits beyond the limits of their current policy.

Employers with existing leave policies are relieved of certain notice requirements, finding replacements, documentation, etc. [See the text of the law for further details.](#)

## Pay Rates:

Employees paid on a commission, piece-rate, mileage, or fee-per-service basis should receive paid sick leave based on an hourly rate that uses the average weekly rate calculation that is based on [the state workers’ compensation statute](#).

## Employer Notice:

As a reminder, under existing law, employers must provide written notice of the Act to employees by **September 15, 2025**, or at the commencement of employment (whichever is later). [See the text of the law for further details.](#)

Additionally, employers must display a poster containing the information required in the notice. If an employer does not maintain a physical workplace or an employee teleworks or performs work through a web-based or app-based platform, the employer must provide notice of such information via electronic communication or a conspicuous posting in the web-based or app-based platform. The NDOL will provide model notices and posters free of charge on the NDOL’s home page prior to September 15, 2025.

## Next Steps:

Review the recently released [FAQs](#) from the NDOL. These FAQs are helpful in providing an overview of the current state of the law.

Review and update pay and sick leave policies and procedures by October 1, 2025.

## New Jersey Releases Pay Transparency Guidance

The State of New Jersey has released guidance that clarifies New Jersey employers' pay transparency obligations under the law.

### The Details:

As a reminder, the State of New Jersey enacted legislation that requires employers to include pay, benefits and other compensation information in job postings for a new job or transfer opportunity. The requirements are in effect.

### Guidance:

The State of New Jersey has released guidance in the form of [frequently asked questions](#) to help employers navigate their pay transparency requirements under the law.

Among other things, the guidance clarifies:

### Covered Employers:

An employer is covered under the state's pay transparency law if it has 10 or more employees working over 20 calendar weeks. When an employer does not have any employees who work in New Jersey, the employer is still covered under the law if it does business in New Jersey or takes applications for employment within New Jersey.

### Job Posted Nationally:

An employer must comply with the state's pay transparency law when the employer is advertising nationally or accepting applications from anywhere in the country if the employer:

- Has the minimum number of employees to be covered under [the state pay transparency law](#); and
- Does business, employs individuals or takes applications for employment in New Jersey.

### Penalties:

Under the [state pay transparency law](#):

- An employer that is found to have violated the law may face a fine of up to \$300 for the first violation and up to \$600 for each subsequent violation.
- It is considered a single violation under the law when an employer publishes the same job posting in multiple places at the same time, such as in a newspaper, on job search websites and on social media.
- An employer who advertises multiple roles in their organization at the same time is subject to one penalty for each role where the job posting fails to comply with the law.

### Next Steps:

- Review the [frequently asked questions](#).
- Update hiring practices to help ensure compliance with the guidance.

## New York State Increases Jury Duty Pay

The New York State Budget for fiscal year 2025-2026 has increased the amount of pay that certain employers must pay to employees on jury duty leave. The requirements under the New York State Budget are **effective immediately**.

### The Details:

### Background:

Under [state law](#), an employer with 11 or more employees was required to pay an employee on jury duty leave at least the jury fee (previously \$40) when an employee's wages for time spent in jury duty would be equal to or higher than the jury fee.

Effective as of June 8, 2025, the [New York State Budget for 2025 – 2026](#) requires a covered employer to:

- Pay employees who are on jury duty leave a daily rate of \$72 (up from \$40) for the first three days of jury duty.
- Pay the entirety of the employee's daily wages, when the wages for time spent absent from work would be lower than the daily jury fee (now \$72 per day).

**Note:** The employee is then entitled to an allowance (to be paid by the state) that is equal to the difference between the amount of the employee's daily wages and \$72.

#### **Next Steps:**

- Review pay and jury duty leave policies.
- Pay covered employees up to the \$72 daily rate for jury duty service, for an employee's first three days, considering agreements and policies that may require employees to be compensated for additional reasons.

## **Oregon Clarifies Hiring Protections Related to Age**

Oregon has enacted legislation (House Bill 3187), which clarifies age-related non-discrimination requirements. House Bill 3187 takes effect on **September 28, 2025**.

#### **The Details:**

##### **Background:**

Existing law prohibits Oregon employers from refusing to hire or employ an individual or ban or discharge an individual from employment on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, marital status, or **age** (if the individual is 18 years of age or older), because the individual associates with someone possessing one of the listed protected characteristics, or because of an individual's juvenile record that has been expunged.

**Note:** Discrimination is not considered an unlawful employment practice if it results from a bona fide occupational qualification reasonably necessary for an employer's normal business operations.

##### **House Bill 3187:**

House Bill 3187 prohibits an employer, prospective employer or employment agency, prior to completing an initial interview (or if there is no initial interview, prior to making a conditional offer of employment), from requesting or requiring disclosure of:

- The applicant's age or date of birth; or
- When the applicant attended or graduated from any educational institution, except when the information is required to:
  - o Affirm that the applicant meets bona fide occupational qualifications; or
  - o Comply with any provision of federal, state or local law, rule or regulation.

#### **Next Steps:**

Update hiring policies and procedures and train supervisors on the [changes under the law](#) by **September 28, 2025**.

## **Oregon Expands Lactation Protections**

Oregon has enacted legislation (House Bill 2541), which expands lactation protections to agricultural workers. House Bill 2541 is **effective immediately**.

#### **The Details:**

[Existing laws](#) require Oregon employers to support lactating employees by providing break time and space (other than a public restroom or toilet stall) to express milk at work for the employee's child who is 18 months of age or younger.

House Bill 2541 expands these protections to [agricultural workers](#).

### Next Steps:

Update lactation policies and procedures and train supervisors on the [changes under the law](#).

## Oregon Expands Paid Sick Leave to Include Blood Donation

Oregon has enacted legislation (Senate Bill 1108), which expands the reasons an employee may take paid sick leave. Senate Bill 1108 takes effect on **January 1, 2026**.

### The Details:

Oregon employers with 10 or more employees (Six or more if they have a location in Portland) must provide [paid sick time](#) for employees to use for a variety of reasons. Employers below these thresholds must provide unpaid sick time.

Senate Bill 1108 expands the reason an employee may use paid sick leave to include blood donation that is made in connection with a voluntary program that is approved or accredited by the American Association of Blood Banks or the American Red Cross.

### Next Steps:

Review and update sick leave policies and procedures and train supervisors on the changes [under the law](#) by **January 1, 2026**.

## Rhode Island Enacts Menopause Protections

The State of Rhode Island has enacted legislation (Senate Bill 0361), which expands its law requiring accommodation of pregnancy-related conditions to include menopause-related conditions. Senate Bill 0361 is **effective immediately**.

### The Details:

As a reminder, Rhode Island [requires an employer to accommodate an employee](#) who requests a reasonable accommodation when the employee is limited in their ability to perform their job due to pregnancy, childbirth and related medical conditions.

### Senate Bill 0361:

Effective immediately, employers must also accommodate menopause and menopause-related conditions. The law clarifies that related conditions include the need to manage the effects of vasomotor symptoms.

### Next Steps:

- Review and update reasonable accommodation policies.
- Train supervisors on the changes [under the law](#).

## Rhode Island Enacts Minimum Wage Legislation

Rhode Island has enacted [Senate Bill 125A](#), which increases the state's minimum wage.

### The Details:

The current minimum wage in Rhode Island is \$15.00 per hour. Senate Bill 125A increases the amount as follows:

**January 1, 2026:** \$16.00 per hour

**January 1, 2027:** \$17.00 per hour

The legislation enacted did not modify the tipped employee minimum cash wage of \$3.89 per hour.

### Next Steps:

Rhode Island employers should be prepared to increase the minimum wage for its employees based on the schedule outlined above.



## Vermont Expands Parental and Family Leave Act and Short-Term Family Leave

Vermont has enacted legislation (House Bill 461), which expands the Vermont Parental and Family Leave Act ("The Act") and short-term family leave protections. House Bill 461 is **effective immediately**.

### The Details:

#### Expanded Parental and Family Leave Act:

Under the expanded Parental and Family Leave Act, an employer with 10 or more employees must provide 12 weeks of unpaid parental and family leave in a 12-month period to an employee to care for themselves or a [covered family member](#), provided the employee:

- Has worked for their employer for at least one year (for an average of at least 30 hours per week); or
- Meets [certain service requirements](#).

#### Reasons for Leave:

House Bill 461 expands the reasons an employee may take leave to encompass:

- The employee's pregnancy
- Caring for or bonding with the child within one year after the child's birth
- The employee's recovery from childbirth or miscarriage
- The adoption or foster placement of a child 18 years or younger (up from 16 years) and to care for or bond with the child within one year after placement
- [Safe leave](#) (for [domestic violence, sexual assault or stalking](#)) or a reason related to safe leave
- [Bereavement leave](#) (up to two weeks out of the 12-week entitlement, with no more than five days to be taken consecutively)
- A [qualifying exigency](#) that is related to active duty service by a family member in the U.S. Armed Forces.

#### Pay:

Parental and Family Leave is generally unpaid. However, an employee may use accrued sick leave, vacation leave, or any other accrued paid leave or short-term disability insurance.

**Note:** Use of accrued paid leave or short-term disability insurance cannot extend the leave.

#### Employee Notice Requirements:

An employee must provide to their employer:

- Reasonable written notice of intent to take leave with the expected start date and the estimated duration of the leave.
- Reasonable notice of the need to extend leave as allowed under the law.

**Note:** If the leave is for a family member, the employer may request documentation identifying the qualifying family relationship.

The amended law has also clarified notice requirements for certain situations:

- **Bereavement leave:** An employer may require an employee to provide documentation of the need for bereavement leave. [See the text of the law for further details](#).
- **Safe leave:** An employer may require an employee to provide documentation of the need for safe leave from [one source as listed in the law](#). **Note:** An employer should not disclose any private medical information or information relating to a safe leave that the employer receives, except where allowed by law and is consented to by the employee in writing, required pursuant to a court order; or required pursuant to state or federal law.
- **A qualifying exigency:** An employer may require an employee to provide documentation of the need for leave for a qualifying exigency as set forth in [29 C.F.R. § 825.309](#).

- **Unanticipated serious health condition, a miscarriage, an unanticipated need for safe leave, a premature birth, the death of a family member, or a short notice qualifying exigency:** An employee must provide notice of the commencement of the leave as soon as practical.

### **Employee Repayment Upon Termination:**

Except for a serious health condition of the employee or safe leave when they are a victim or alleged victim, an employee who does not return to employment with their employer must return to their employer the value of any compensation that the employer paid to or on behalf of the employee during the leave (except payments for accrued leave).

### **Short-Term Family Leave:**

As a reminder, Vermont employers must provide unpaid leave up to four hours per 30-day period, and in total up to 24 hours in any 12-month period to use for [covered reasons](#) in a minimum of two-hour segments.

The law is amended to expand the definition of a [covered family member](#) that is eligible to use short-term family leave.

### **Next Steps:**

Review and update leave policies and procedures and train supervisors on the requirements under the law.

## **Washington State Adds Immigration Status Protections**

The State of Washington has enacted legislation (Senate Bill 5104), which adds immigration status protections. Senate Bill 5104 is effective **July 1, 2025**.

### **The Details:**

Senate Bill 5104 prohibits an employer from coercing a worker based on the worker's immigration status.

The law defines coercion as a threat to compel or induce an individual to engage in conduct which the individual has a lawful right to refuse, or to abstain from conduct in which the individual has the lawful right to engage.

The law defines a threat as any implicit or explicit communication that specifically relates to an employee's or their family member's immigration status that is made by the employer to deter an employee from engaging in protected activities or exercising their rights under the law.

### **Penalties:**

Employers that are found to have violated the law may face penalties.

### **Next Steps:**

Review policies and procedures related to immigration status and train supervisors on the changes under the law by **July 1, 2025**.

## **Washington State Adds Leave for Victims of a Hate Crime**

The State of Washington has enacted legislation (Senate Bill 5101), which requires an employer to provide safety accommodations and unpaid leave when an employee or their family member is a victim of a hate crime. Senate Bill 5101 takes effect on **January 1, 2026**.

### **The Details:**

Senate Bill 5101 will require employers to provide unpaid leave to an employee or their family member who is a victim of a hate crime. The law defines a hate crime as the commission, an attempted commission, or alleged commission of a [covered offense](#).

**Note:** The law clarifies that covered offenses include those committed through online or internet-based communication.

### **Background:**

[Washington law](#) requires an employer to provide the following when an employee (or their family member) is a victim of domestic violence, sexual assault, or stalking:

- A reasonable amount of unpaid leave from work to seek legal or law enforcement assistance, treatment or counseling for physical or mental injuries, or social services; and
- Reasonable safety accommodations (absent an undue hardship), such as:
  - o A transfer or reassignment
  - o Modified schedule
  - o Changed work telephone number and/or email address
  - o A different workstation
  - o Installed lock
  - o Implemented safety procedure
  - o Another adjustment to a job structure, workplace facility, or work requirement in response to an actual or threatened incident

The law also contains non-discrimination and non-retaliation provisions for actual (or perceived) victim status and when an employee lawfully exercises their rights to leave and accommodation.

Additionally, [the Washington Minimum Wage Act](#) allows an employee to use [paid sick leave](#) for absences that qualify for leave under the [Domestic Violence Leave Law](#).

#### Next Steps:

- Review and update leave policies and procedures by **January 1, 2026**.
- Train supervisors on the [changes to the law](#).
- Consider consulting legal counsel if you are in a local jurisdiction (such as Seattle, Tacoma, or SeaTac) with a paid sick leave law that may allow employees to use such time for hate crime leave.

## Washington State Expands Paid Family Leave Act

The State of Washington has enacted legislation (House Bill 1213), which expands protections under the Washington Paid Family Leave Act. House Bill 1213 takes effect on **January 1, 2026**.

#### The Details:

##### Minimum Leave Amounts:

The [Washington Paid Family Leave Act](#) currently requires an employee to take at least eight consecutive hours of leave per use. Beginning January 1, 2026, House Bill 1213 reduces this amount to four consecutive hours of leave per use.

##### Eligibility for Job Restoration:

Existing law requires employers with 50 or more employees to restore an employee that is returning from family and medical leave to the position they held when their leave commenced or its equivalent (with equivalent employment benefits, pay and other terms and conditions of employment).

Beginning January 1, 2026, House Bill 1213 expands the job-restoration requirement to cover additional employers as follows:

Date	Covered Employers
January 1, 2026	Employers with 25 or more employees
January 1, 2027	Employers with 15 or more employees
January 1, 2028	Employers with 8 or more employees

Under existing law, an employee must also work for their covered employer for at least 12 months (length-of-service requirement) and for at least 1,250 hours (service-hours requirement) in the year before taking the leave to be eligible for job restoration.

Effective January 1, 2026, House Bill 1213 reduces the length-of-service requirement to 180 days and removes the service-hours requirement.

### **Anti-Stacking Provision:**

House Bill 1213 also adds a mechanism to help prevent employees from stacking job protections under the state program with those under the federal Family and Medical Leave Act (FMLA). Essentially, the provision is meant to help prevent employees from returning from one job-protected leave to then go out on another type of leave for the same issue when the employee's issue qualifies for both types of leave.

Specifically, the right to job protection is extended to any period of unpaid leave protected by the FMLA where the employee was eligible for paid family and medical leave benefits, but didn't apply for and receive those benefits, so long as the employer provides certain written notice to the employee.

The notice must:

- Be provided:
  - o In a language understood by the employee;
  - o Using a method reasonably certain to be promptly received;
  - o Within five business days of the employee's initial request for (or use of) FMLA leave (whichever is earlier); and
  - o At least monthly for the rest of the employer's designated 12-month leave year.
- State the following:
  - o The employer is designating and counting the employee's unpaid leave against the employee's FMLA entitlement;
  - o The amount of leave used and remaining (as estimated by the employer based on information provided by the [Department of Labor & Industries \(DOLI\)](#) and the employee);
  - o The start and end dates of the employer's 12-month leave year for FMLA purposes;
  - o Since the employee is eligible for paid family and medical leave but is not applying for and receiving benefits, the unpaid leave is counted toward the maximum periods of leave allowed under the law;
  - o Employers must also specify the start and end dates of the unpaid leave and the total amount of the unpaid leave counting toward those maximum periods (as estimated by the employer based on information provided by [the DOLI](#) and the employee); and
  - o Use of unpaid leave counting against certain periods doesn't affect the employee's eligibility for paid family or medical leave benefits under the law.

### **Asserting Job Restoration Rights:**

Beginning on January 1, 2026, an employee must assert their right to job restoration to be entitled to it. Specifically, unless an agreement between the employer and employee states otherwise, an employee forfeits the right to job restoration if they fail to exercise it upon the earlier of the first scheduled workday following:

- The period of leave; or
- A continuous period of (or combined intermittent periods of) a total of 16 typical workweeks of leave taken during a period of 52 consecutive calendar weeks. **Note:** This period is extended to 18 typical workweeks of leave taken during a period of 52 consecutive calendar weeks if any of the leave was taken as a result of a serious health condition with a pregnancy resulting in incapacity.

### **Notice of End of Job Restoration Rights:**

For any continuous period of leave that exceeds two work weeks or any combined intermittent periods of leave exceeding three workdays, an employer must provide at least five business days' advance written notice to the employee, regarding:

- The estimated expiration of the right of employment restoration; and
- The date of the employee's first scheduled workday.

For combined intermittent periods of leave, an employer may estimate the expiration of the right of employment restoration based on information provided to the employer by the employee and the DOLI.

### Notice and Poster:

Employers will be required to distribute an updated notice to employees and to display an updated poster (to be developed by the DOLI) of employees' rights under the law.

### Recordkeeping:

[The DOLI](#) may conduct periodic audits of employer files and records.

### Resources:

House Bill 1213 also establishes a new \$3,000 grant for employers with fewer than 50 employees to help cover the costs of hiring a temporary worker to:

- Replace an employee on leave for a period of seven days or more; or
- For significant additional wage related costs due to an employee's leave. See the text of the law for further details.

### Next Steps:

- Update leave policies and procedures and train supervisors on the [changes under the law](#) by **January 1, 2026**.
- Monitor for notice and poster updates from [the DOLI](#).

## Washington State Increases Child Labor Protections

The State of Washington has enacted legislation (House Bill 1644), which adds child labor protections. House Bill 1644 is effective **July 1, 2026**.

### The Details:

Under the law:

- Penalties for employers that are found to have violated the law are significantly increased (and will continue to increase on a schedule, accounting for inflation, beginning July 1, 2027 and every two years thereafter).
- An employer's work permit for a minor employee will be revoked for at least 12 months when the employer receives a citation or restraining order for certain violations under the law. An employer will also be prohibited from obtaining a minor work permit for at least 12 months.

### Next Steps:

Review policies and procedures related to employing a minor, including permit requirements, work hours, wage requirements and safety procedures.

## Washington State Increases Safety Standards for Isolated Employees

The State of Washington has enacted legislation (House Bill 1524), which increases certain employer's workplace safety requirements for isolated employees. House Bill 1524 takes effect on **January 1, 2026**.

### The Details:

### Background:

The [Washington State Department of Labor & Industries](#) (DOLI) requires certain employers (all hotel, motel, retail, security guard entities, or property services contractors) to:

- Adopt a sexual harassment policy;
- Provide mandatory training to the employer's managers and supervisors;
- Prevent sexual assault, sexual harassment, and sexual discrimination in the workplace;
- Educate the employer's workforce regarding protection for employees who report violations of a state or federal law, rule, or regulation; and

- Provide [a list of resources](#) for the employer's employees to utilize.

### House Bill 1524:

The law provides the following definitions:

- **An isolated employee** is a worker who is employed by an employer as a janitor, security guard, hotel or motel housekeeper, or room service attendant and:
  - o Performs work in an area where two or more co-workers, supervisors, or a combination, are unable to immediately respond to an emergency without being summoned by the employee; or
  - o Spends at least 50 percent of their working hours without a supervisor or another co-worker present.
- **A panic button** is an emergency contact device carried by an isolated employee that allows them to summon immediate on-scene assistance from another worker, a security guard, or a representative of the employer that:
  - o Is designed to be carried by the isolated employee;
  - o Is simple to activate without delays caused by entering passwords or waiting for the system to turn on;
  - o Provides an effective signal for the circumstances when activated; and
  - o Is able to summon immediate assistance and allow responders to accurately identify the isolated employee's location.

### Employer Requirements:

Under the law, all employers that employ one or more workers must:

- Provide to each isolated employee:
  - o The required training;
  - o Education on protections for employees who report violations of the law;
  - o The [list of resources](#); and
  - o A panic button.
- Inform isolated employees during the mandatory training on how to use panic buttons, and train managers and supervisors on the responsibility to respond to the use of panic buttons.
- Maintain a record of the purchase and utilization of panic buttons provided to isolated employees and provide records to the DOLI upon request.
- Document completion of the mandatory training and provide the documentation to the DOLI upon request.

**Note:** A property services contractor must now submit information required under the law on an annual basis. [See the text of the law for further details.](#)

### Next Steps:

Review workplace safety policies, training, and procedures, provide panic buttons, and train supervisors on the law's requirements by **January 1, 2026**.

# Local

## Los Angeles Hotel and Airport Worker Minimum Wage Put on Hold

The Los Angeles Office of the City Clerk [announced](#) that a referendum petition has been filed challenging Ordinance No. 188610, which raised the minimum wage for Los Angeles hotel and airport workers.

### The Details:

Ordinance No. 188610, signed into law on June 27, 2025, stipulated that Los Angeles city hotel workers at properties with 60 or more rooms and airport workers must be paid a minimum wage of at least \$22.50 per hour beginning July 1, 2025.

However, until the challenge to Ordinance No. 188610 is resolved, the minimum wage will not increase. As a result, the minimum wage for hotel workers working at a hotel with 60 or more rooms is \$21.01 and airport workers currently must be paid at least \$19.28 per hour. In addition, the payment amount for health benefits provided to an employee working for an employer servicing the airport (LAX) must be at least \$6.09 per hour.

### Next Steps:

Continue to pay at least the current minimum wage and monitor the challenge for any updates to the minimum wage requirements.

## Pittsburgh Expands Paid Sick Leave Requirements

The City of Pittsburgh has enacted legislation (Ordinance 11), which expands its paid sick leave law requirements. The Ordinance is effective **January 1, 2026**.

### The Details:

#### Background:

The City of Pittsburgh requires employers to provide paid sick leave under the Paid Sick Days Act.

#### The Ordinance:

Under [the Ordinance](#), an employer must provide at least one hour of paid sick leave for every 30 hours worked (previously every 35 hours) in a calendar year.

#### Accrual & Use:

Employees must be able to accrue and use the following amounts of paid sick leave in a calendar year:

- **15 or More Employees:** 72 hours of paid sick leave (previously 40)
- **Less than 15 Employees:** 48 hours of paid sick leave (previously 24)

#### Carryover:

The Ordinance also clarifies that employers are not required to carry over paid sick leave if they provide (e.g. frontload) the required amount of paid sick leave (72 or 48 hours) per calendar year at the beginning of each calendar year.

### Next Steps:

Review and update pay and sick leave policies and procedures by **January 1, 2026**.

# Minimum Wage

## Minimum Wage Announcements– 6/21/25 – 7/20/25

The following states or localities have announced new minimum wage increases.

State or Locality	Minimum Wage Rate	Minimum Tipped Cash Wage	Effective Date(s)	New or Updated Poster Requirement?	Notes
Glendale, CA (60 or more rooms)	\$21.01	\$21.01*	7/1/25	<a href="#">Yes</a>	Previously announced as \$22.50 per hour.
Los Angeles, CA (City) Hotel Workers (60 or more rooms)	\$21.01	\$21.01*	7/1/25	<a href="#">Yes</a>	Previously announced as \$22.50 per hour.
Santa Monica, CA Hotel Workers (60 or more rooms)	\$21.01	\$21.01*	7/1/25	<a href="#">Yes</a>	Previously announced as \$22.50 per hour.

\*CA does not allow the use of tip credit.

[Download a PDF of a comprehensive listing of state and local minimum wage rates.](#)

## ADP Compliance Resources

ADP maintains a staff of dedicated professionals who carefully monitor federal and state legislative and regulatory measures affecting employment-related human resource, payroll, tax and benefits administration, and help ensure that ADP systems are updated as relevant laws evolve. For the latest on how federal and state tax law changes may impact your business, visit the ADP **Eye on Washington** Web page located at [www.adp.com/regulatorynews](http://www.adp.com/regulatorynews).

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