

## **New DOL Guidance States Families First Coronavirus Response Act is Not Effective Until April 1**

The Department of Labor (DOL) issued new guidance on the Families First Coronavirus Response Act on March 24 stating that the provisions, including the Emergency Family and Medical Leave Expansion Act (EFMLEA) and the Emergency Paid Sick Leave Act (EPSLA), are effective April 1 and not April 2 as we expected based on the language of the law.

Also important to note, is that the DOL states that these provisions are not retroactive, meaning that this will not apply to any employees prior to April 1. Based on DOL guidance any employee that needs time off for childcare, because of the illness, or any other reason as stated in the EFMLEA and EPSLA will need to use paid time off pursuant to the employer's current policies. Also, if the employer has already provided these provisions to an employee, they will be entitled to the same provisions beginning April 1.

Outside of this, the guidance is very helpful and can be found at <https://www.dol.gov/agencies/whd/pandemic/ffcra-questions>. The DOL also indicated that it will be issuing additional implementation regulations regarding the new law in the near future. As always, we will provide you the information as timely as possible.

We have updated guidance and updated Orders available on the [KLC website](#) and will continue to update as changes occur. If you have any questions about this or any other employment law related questions please contact Personnel Services Manager Andrea Shindlebower Main or Courtney Risk Straw Personnel Services Attorney.