

# What Your Family Business Needs to Know About the Families First Coronavirus Response Act



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Robert L. Rediger, Esq.  
Rediger Labor Law LLP  
[rlr@rediger.law](mailto:rlr@rediger.law)

# The Families First Coronavirus Response Act

- On March 18, 2020, President Trump signed into law the Families First Coronavirus Response Act (FFCRA). The new law is effective from April 1, 2020 through December 31, 2020.
- The FFCRA requires certain employers to provide their employees with paid sick leave (Emergency Paid Sick Leave Act or EPSLA) or expanded family and medical leave (Emergency Family and Medical Leave Expansion Act or EFMLA) for specified reasons related to COVID-19.
- The Wage and Hour Division of the U. S. Department of Labor (DOL) administers and enforces the new law's paid leave requirements.
- On April 6, 2020, the DOL issued temporary regulations to implement the FFCRA. (29 CFR Part 826).  
<https://www.govinfo.gov/content/pkg/FR-2020-04-06/pdf/2020-07237.pdf>
- The DOL also updates its website entitled "Families First Coronavirus Response Act: Questions and Answers" to provide compliance assistance to employers and employees on their responsibilities and rights under the FFCRA. <https://www.dol.gov/agencies/whd/pandemic/ffcra-questions>
- Four aspects of the FFCRA apply to certain public sector employers, and private sector employers with fewer than 500 employees, to provide paid sick leave, paid family and medical leave with tax credits for the paid leave, and expanded unemployment insurance benefits.

# The Emergency Paid Sick Leave Act

- The Emergency Paid Sick Leave Act (EPSLA) is part of the FFCRA. Employees of private sector employers with fewer than 500 employees, and certain public sector employers, are eligible for **up to two weeks** (80 hours, or a part-time employee's two-week equivalent) of fully or partially paid sick leave for COVID-19 related reasons. Part-time employees are eligible for leave for the number of hours that the employee is normally scheduled to work over that period.
- Leave paid **at 100% up to \$511 daily and \$5,110 total** if the employee:
  - 1) is subject to a Federal, State, or local quarantine or isolation order related to COVID-19,
  - 2) has been advised by a health care provider to self-quarantine related to COVID-19, or
  - 3) is experiencing COVID-19 symptoms and is seeking a medical diagnosis.
- Leave paid **at 2/3 up to \$200 daily and \$2,000 total** if the employee:
  - 1) is caring for an individual subject to a Federal, State, or local quarantine or isolation order related to COVID-19 or
  - 2) is experiencing any other substantially similar condition specified by the U.S. Department of Health and Human Services.
- Employees are eligible to receive up to 12 weeks of paid sick leave and expanded family and medical leave paid **at 2/3 up to \$200 daily and \$12,000 total** if the employee is caring for his or her child whose school or place of care is closed (or childcare provider is unavailable) due to COVID-19 related reasons.

(29 CFR §§ 826.20 and 826.21)

# The Emergency Family and Medical Leave Expansion Act (EFMLA)

- Employees who have been employed for at least 30 days prior to their leave request may be eligible for up to an **additional 10 weeks** of partially paid expanded family and medical leave for if he or she is caring for his or her child whose school or place of care is closed (or childcare provider is unavailable) due to COVID-19 related reasons.
- The EFMLA applies only when an employee is on leave to care for his or her child whose school or place of care is closed, or whose child care provider is unavailable, due to COVID-19 related reasons.
- The EFMLA does not distinguish between full and part-time employees, but the number of hours an employee normally works each week will affect the amount of pay the employee is eligible to receive.

(29 CFR §§ 826.23 and 826.24)

# Temporary Regulations Implementing FFCRA

On April 6, 2020, the DOL issued temporary regulations to implement the FFCRA.

<https://www.govinfo.gov/content/pkg/FR-2020-04-06/pdf/2020-07237.pdf>

## 29 USC PART 826—Paid Leave Under The Families First Coronavirus Response Act

826.10 General.

826.20 Paid leave entitlements.

826.21 Amount of Paid Sick Leave.

826.22 Amount of pay for Paid Sick Leave.

826.23 Amount of Expanded Family and Medical Leave.

826.24 Amount of pay for Expanded Family and Medical Leave.

826.25 Calculating the Regular Rate under the FFCRA.

826.30 Employee eligibility for leave.

826.40 Employer coverage.

826.50 Intermittent leave.

826.60 Leave to care for a Child due to School or Place of Care closure or Child Care unavailability—intersection between the EPSLA and the EFMLEA.

826.70 Leave to care for a Child due to School or Place of Care closure or Child Care unavailability—intersection of the EFMLEA and the FMLA.

826.80 Employer notice.

826.90 Employee notice of need for leave.

826.100 Documentation of need for leave.

826.110 Health care coverage.

826.120 Multiemployer plans.

826.130 Return to work.

826.140 Recordkeeping.

826.150 Prohibited acts and enforcement under the EPSLA.

826.151 Prohibited acts and enforcement under the EFMLEA.

826.152 Filing a complaint with the Federal Government.

826.153 Investigative authority of the Secretary.

826.160 Effect on other laws, employer practices, and collective bargaining agreements.

## DOL's Families First Coronavirus Response Act: Questions and Answers

- On March 30, 2020, the DOL last updated its website entitled “Families First Coronavirus Response Act: Questions and Answers” to provide compliance assistance to employers and employees on their responsibilities and rights under the FFCRA.
- Following are excerpts from the 79 questions and answers that appear on the DOL's website. I have included titles for this Webinar. All 79 of the DOL's Q&As can be found at <https://www.dol.gov/agencies/whd/pandemic/ffcra-questions>

## Private Sector Employers Covered by the FFCRA

2. As an employer, how do I know if my business is under the 500-employee threshold and therefore must provide paid sick leave or expanded family and medical leave?

You have fewer than 500 employees if, at the time your employee's leave is to be taken, you employ fewer than 500 full-time and part-time employees within the United States, which includes any State of the United States, the District of Columbia, or any Territory or possession of the United States. In making this determination, you should include employees on leave; temporary employees who are jointly employed by you and another employer (regardless of whether the jointly-employed employees are maintained on only your or another employer's payroll); and day laborers supplied by a temporary agency (regardless of whether you are the temporary agency or the client firm if there is a continuing employment relationship)...

(29 CFR §826.40)

## The Small Business Exemption

4. If providing child care-related paid sick leave and expanded family and medical leave at my business with fewer than 50 employees would jeopardize the viability of my business as a going concern, how do I take advantage of the small business exemption?

To elect this small business exemption, you should document why your business with fewer than 50 employees meets the criteria set forth by the Department, which will be addressed in more detail in forthcoming regulations.

## The Small Business Exemption (continued)

### 58. When does the small business exemption apply to exclude a small business from the provisions of the Emergency Paid Sick Leave Act and Emergency Family and Medical Leave Expansion Act?

An employer, including a religious or nonprofit organization, with fewer than 50 employees (small business) is exempt from providing (a) paid sick leave due to school or place of care closures or child care provider unavailability for COVID-19 related reasons and (b) expanded family and medical leave due to school or place of care closures or child care provider unavailability for COVID-19 related reasons when doing so would jeopardize the viability of the small business as a going concern. A small business may claim this exemption if an authorized officer of the business has determined that:

1. The provision of paid sick leave or expanded family and medical leave would result in the small business's expenses and financial obligations exceeding available business revenues and cause the small business to cease operating at a minimal capacity;
2. The absence of the employee or employees requesting paid sick leave or expanded family and medical leave would entail a substantial risk to the financial health or operational capabilities of the small business because of their specialized skills, knowledge of the business, or responsibilities; or
3. There are not sufficient workers who are able, willing, and qualified, and who will be available at the time and place needed, to perform the labor or services provided by the employee or employees requesting paid sick leave or expanded family and medical leave, and these labor or services are needed for the small business to operate at a minimal capacity.

# An Employee's Regular Rate of Pay is Used to Calculate Paid Leave

## 8. What is my regular rate of pay for purposes of the FFCRA?

For purposes of the FFCRA, the regular rate of pay used to calculate your paid leave is the average of your regular rate over a period of up to six months prior to the date on which you take leave. If you have not worked for your current employer for six months, the regular rate used to calculate your paid leave is the average of your regular rate of pay for each week you have worked for your current employer.

If you are paid with commissions, tips, or piece rates, these amounts will be incorporated into the above calculation to the same extent they are included in the calculation of the regular rate under the FLSA.

You can also compute this amount for each employee by adding all compensation that is part of the regular rate over the above period and divide that sum by all hours actually worked in the same period.

(29 CFR §826.22)

# Records an Employer Must Keep to Claim a Tax Credit

## 15. What records do I need to keep when my employee takes paid sick leave or expanded family and medical leave?

Private sector employers that provide paid sick leave and expanded family and medical leave required by the FFCRA are eligible for reimbursement of the costs of that leave through refundable tax credits. If you intend to claim a tax credit under the FFCRA for your payment of the sick leave or expanded family and medical leave wages, you should retain appropriate documentation in your records. You should consult Internal Revenue Service (IRS) applicable forms, instructions, and information for the procedures that must be followed to claim a tax credit, including any needed substantiation to be retained to support the credit. You are not required to provide leave if materials sufficient to support the applicable tax credit have not been provided.

If one of your employees takes expanded family and medical leave to care for his or her child whose school or place of care is closed, or child care provider is unavailable, due to COVID-19, you may also require your employee to provide you with any additional documentation in support of such leave, to the extent permitted under the certification rules for conventional FMLA leave requests. For example, this could include a notice that has been posted on a government, school, or day care website, or published in a newspaper, or an email from an employee or official of the school, place of care, or child care provider.

# Documentation an Employee Must Provide an Employer

## 16. What documents do I need to give my employer to get paid sick leave or expanded family and medical leave?

You must provide to your employer documentation in support of your paid sick leave as specified in applicable IRS forms, instructions, and information.

Your employer may also require you to provide additional in support of your expanded family and medical leave taken to care for your child whose school or place of care is closed, or child care provider is unavailable, due to COVID-19-related reasons. For example, this may include a notice of closure or unavailability from your child's school, place of care, or child care provider, including a notice that may have been posted on a government, school, or day care website, published in a newspaper, or emailed to you from an employee or official of the school, place of care, or child care provider. Your employer must retain this notice or documentation in support of expanded family and medical leave, including while you may be taking unpaid leave that runs concurrently with paid sick leave if taken for the same reason.

Please also note that all existing certification requirements under the FMLA remain in effect if you are taking leave for one of the existing qualifying reasons under the FMLA. For example, if you are taking leave beyond the two weeks of emergency paid sick leave because your medical condition for COVID-19-related reasons rises to the level of a serious health condition, you must continue to provide medical certifications under the FMLA if required by your employer.

# Telecommuting

## 17. When am I able to telework under the FFCRA?

You may telework when your employer permits or allows you to perform work while you are at home or at a location other than your normal workplace. Telework is work for which normal wages must be paid and is not compensated under the paid leave provisions of the FFCRA.

## 19. If I am or become unable to telework, am I entitled to paid sick leave or expanded family and medical leave?

If your employer permits teleworking—for example, allows you to perform certain tasks or work a certain number of hours from home or at a location other than your normal workplace—and you are unable to perform those tasks or work the required hours because of one of the qualifying reasons for paid sick leave, then you are entitled to take paid sick leave. Similarly, if you are unable to perform those teleworking tasks or work the required teleworking hours because you need to care for your child whose school or place of care is closed, or child care provider is unavailable, because of COVID-19 related reasons, then you are entitled to take expanded family and medical leave. Of course, to the extent you are able to telework while caring for your child, paid sick leave and expanded family and medical leave is not available.

## The FFCRA Does Not Apply Retroactively

23. If my employer closed my worksite before April 1, 2020 (the effective date of the FFCRA), can I still get paid sick leave or expanded family and medical leave?

No. If, prior to the FFCRA's effective date, your employer sent you home and stops paying you because it does not have work for you to do, you will not get paid sick leave or expanded family and medical leave but you may be eligible for unemployment insurance benefits. This is true whether your employer closes your worksite for lack of business or because it is required to close pursuant to a Federal, State, or local directive. You should contact your State workforce agency or State unemployment insurance office for specific questions about your eligibility. It should be noted, however, that if your employer is paying you pursuant to a paid leave policy or State or local requirements, you are not eligible for unemployment insurance.

(29 CFR § 826.160)

## Paid Sick Leave under the EPSLA is in Addition to Other Leave Entitlements

32. If I am an employer, may I use the paid sick leave mandated under the EPSLA to satisfy paid leave entitlements that an employee may have under my paid leave policy?

No, unless your employee agrees. Paid sick leave under the EPSLA is in addition to your employee's other leave entitlements. You may not require your employee to use provided or accrued paid vacation, personal, medical, or sick leave before the paid sick leave. You also may not require your employee to use such existing leave concurrently with the paid sick leave under the EPSLA. But if you and your employee agree, your employee may use preexisting leave entitlements to supplement the amount he or she receives from paid sick leave, up to the employee's normal earnings. Note, however, that you are not entitled to a tax credit for any paid sick leave that is not required to be paid or exceeds the limits set forth under the EPSLA. You are free to amend your own policies to the extent consistent with applicable law.

(29 CFR § 826.60)

## Leave under the EFMLEA May Run Concurrently with an Employer's Policies

33. If I am an employer, may I require my employee to take paid leave he or she may have under my existing paid leave policy concurrently with expanded family and medical leave under the EFMLEA?

Yes. After the first two workweeks (usually 10 workdays) of expanded family and medical leave under the EFMLEA, you may require that your employee take concurrently for the same hours expanded family and medical leave and existing leave that, under your policies, would be available to the employee in that circumstance. This would likely include personal leave or paid time off, but not medical or sick leave if your employee (or a covered family member) is not ill.

If you do so, you must pay your employee the full amount to which he or she is entitled under your existing paid leave policy for the period of leave taken. You must pay your employee at least 2/3 of his or her pay for subsequent periods of expanded family and medical leave taken, up to \$200 per workday and \$10,000 in the aggregate, for expanded family and medical leave. If your employee exhausts all preexisting paid vacation, personal, medical, or sick leave, you would need to pay your employee at least 2/3 of his or her pay for subsequent periods of expanded family and medical leave taken, up to \$200 per day and \$10,000 in the aggregate. You are free to amend your own policies to the extent consistent with applicable law.

(29 CFR § 826.23)

## Right of Reinstatement under the EFMLEA and the EPSLA

### 43. Do I have a right to return to work if I am taking paid sick leave or expanded family and medical leave under the Emergency Paid Sick Leave Act or the Emergency Family and Medical Leave Expansion Act?

Generally, yes. In light of Congressional direction to interpret requirements among the Acts consistently, WHD clarifies that the Acts require employers to provide the same (or a nearly equivalent) job to an employee who returns to work following leave.

In most instances, you are entitled to be restored to the same or an equivalent position upon return from paid sick leave or expanded family and medical leave. Thus, your employer is prohibited from firing, disciplining, or otherwise discriminating against you because you take paid sick leave or expanded family and medical leave. Nor can your employer fire, discipline, or otherwise discriminate against you because you filed any type of complaint or proceeding relating to these Acts, or have or intend to testify in any such proceeding.

However .....

## Right of Reinstatement under the EFMLEA and the EPSLA (continued)

However, you are not protected from employment actions, such as layoffs, that would have affected you regardless of whether you took leave. This means your employer can lay you off for legitimate business reasons, such as the closure of your worksite. Your employer must be able to demonstrate that you would have been laid off even if you had not taken leave.

Your employer may also refuse to return you to work in your same position if you are a highly compensated “key” employee as defined under the FMLA, or if your employer has fewer than 25 employees, and you took leave to care for your own son or daughter whose school or place of care was closed, or whose child care provider was unavailable, and all four of the following hardship conditions exist:

1. your position no longer exists due to economic or operating conditions that affect employment and due to COVID-19 related reasons during the period of your leave;
2. your employer made reasonable efforts to restore you to the same or an equivalent position;
3. your employer makes reasonable efforts to contact you if an equivalent position becomes available; and
4. your employer continues to make reasonable efforts to contact you for one year beginning either on the date the leave related to COVID-19 reasons concludes or the date 12 weeks after your leave began, whichever is earlier.

# The Employee Who Decides to Self-Quarantine

## 61. When am I eligible for paid sick leave to self-quarantine?

You are eligible for paid sick leave if a health care provider directs or advises you to stay home or otherwise quarantine yourself because the health care provider believes that you may have COVID-19 or are particularly vulnerable to COVID-19, and quarantining yourself based upon that advice prevents you from working (or teleworking).

## 62. I am an employee. I become ill with COVID-19 symptoms, decide to quarantine myself for two weeks, and then return to work. I do not seek a medical diagnosis or the advice of a health care provider. Can I get paid for those two weeks under the FFCRA?

Generally no. If you become ill with COVID-19 symptoms, you may take paid sick leave under the FFCRA only to seek a medical diagnosis or if a health care provider otherwise advises you to self-quarantine. If you test positive for the virus associated with COVID-19 or are advised by a health care provider to self-quarantine, you may continue to take paid sick leave. You may not take paid sick leave under the FFCRA if you unilaterally decide to self-quarantine for an illness without medical advice, even if you have COVID-19 symptoms. Note that you may not take paid sick leave under the FFCRA if you become ill with an illness not related to COVID-19. Depending on your employer's expectations and your condition, however, you may be able to telework during your period of quarantine.

## The Employee on a Leave of Absence

### 77. May I take paid sick leave or expanded family and medical leave under the FFCRA if I am on an employer-approved leave of absence?

It depends on whether your leave of absence is voluntary or mandatory. If your leave of absence is voluntary, you may end your leave of absence and begin taking paid sick leave or expanded family and medical leave under the FFCRA if a qualifying reason prevents you from being able to work (or telework). However, you may not take paid sick leave or expanded family and medical leave under the FFCRA if your leave of absence is mandatory. This is because it is the mandatory leave of absence—and not a qualifying reason for leave—that prevents you from being able to work (or telework).

In the instance of a mandatory leave of absence, you may be eligible for unemployment insurance benefits. You should contact your State workforce agency or State unemployment insurance office for specific questions about your eligibility.

(29 CFR § 826.40)

## Where to Find Additional Information

Additional information pertaining to an employer's obligations under discrimination, wage and hour, unemployment insurance, and workplace safety laws can be found on the following governmental web sites:

### Federal

- The Department of Labor, Wage and Hour Division's Temporary Rule entitled "Paid Leave Under the Families First Coronavirus Response Act" published on April 6, 2020 (29 CFR Part 826) <https://www.govinfo.gov/content/pkg/FR-2020-04-06/pdf/2020-07237.pdf>
- The Equal Employment Opportunity Commission (EEOC) web page entitled "Coronavirus and COVID-19" <https://www.eeoc.gov/coronavirus/> and "What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws" [https://www.eeoc.gov/eeoc/newsroom/wysk/wysk\\_ada\\_rehabilitaion\\_act\\_coronavirus.cfm?utm\\_content=&utm\\_medium=email&utm\\_name=&utm\\_source=govdelivery&utm\\_term=](https://www.eeoc.gov/eeoc/newsroom/wysk/wysk_ada_rehabilitaion_act_coronavirus.cfm?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=)
- The Occupational Safety and Health Administration web page entitled "COVID-19." <https://www.osha.gov/SLTC/covid-19/>
- OSHA web page entitled "Enforcement Guidance for Respiratory Protection and the N95 Shortage Due to the Coronavirus Disease 2019 (COVID-19) Pandemic" dated April 3, 2020 <https://www.osha.gov/memos/2020-04-03/enforcement-guidance-respiratory-protection-and-n95-shortage-due-coronavirus>

## Where to Find Additional Information (continued)

### Federal (continued)

- The Centers for Disease Control and Prevention (CDC) web pages entitled “Coronavirus COVID-19.” <https://www.cdc.gov/coronavirus/2019-nCoV/index.html> and “Recommendation Regarding the Use of Cloth Face Coverings, Especially in Areas of Significant Community-Based Transmission” <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover.html>
- The Internal Revenue Service web page entitled “COVID-19-Related Tax Credits for Required Paid Leave Provided by Small and Midsize Businesses FAQs” <https://www.irs.gov/newsroom/covid-19-related-tax-credits-for-required-paid-leave-provided-by-small-and-midsize-businesses-faqs#basic>
- IRS Form 7200 entitled “Advance Payment of Employer Credits Due to COVID-19” <https://www.irs.gov/pub/irs-pdf/f7200.pdf>

### State

- California Employment Development Department (EDD) web page entitled “Coronavirus 2019 (COVID-19).” [https://www.edd.ca.gov/about\\_edd/coronavirus-2019.htm](https://www.edd.ca.gov/about_edd/coronavirus-2019.htm)
- Cal-OSHA web page entitled “Guidance on Requirements to Protect Workers from Coronavirus.” <https://www.dir.ca.gov/dosh/coronavirus/Health-Care-General-Industry.html>
- The California Labor Commissioner web page “Coronavirus Disease (COVID-19) – FAQs on laws enforced by the California Labor Commissioner’s Office” <https://www.dir.ca.gov/dlse/2019-Novel-Coronavirus.htm>
- California Department of Public Health web page entitled “Face Coverings Guidance” <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Face-Coverings-Guidance.aspx>

# EMPLOYEE RIGHTS

## PAID SICK LEAVE AND EXPANDED FAMILY AND MEDICAL LEAVE UNDER THE FAMILIES FIRST CORONAVIRUS RESPONSE ACT

The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide their employees with paid sick leave and expanded family and medical leave for specified reasons related to COVID-19. These provisions will apply from April 1, 2020 through December 31, 2020.

### ► PAID LEAVE ENTITLEMENTS

Generally, employers covered under the Act must provide employees:

Up to two weeks (80 hours, or a part-time employee's two-week equivalent) of paid sick leave based on the higher of their regular rate of pay, or the applicable state or Federal minimum wage, paid at:

- 100% for qualifying reasons #1-3 below, up to \$511 daily and \$5,110 total;
- ⅔ for qualifying reasons #4 and 6 below, up to \$200 daily and \$2,000 total; and
- Up to 12 weeks of paid sick leave and expanded family and medical leave paid at ⅔ for qualifying reason #5 below for up to \$200 daily and \$12,000 total.

A part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

### ► ELIGIBLE EMPLOYEES

In general, employees of private sector employers with fewer than 500 employees, and certain public sector employers, are eligible for up to two weeks of fully or partially paid sick leave for COVID-19 related reasons (see below). *Employees who have been employed for at least 30 days prior to their leave request may be eligible for up to an additional 10 weeks of partially paid expanded family and medical leave for reason #5 below.*

### ► QUALIFYING REASONS FOR LEAVE RELATED TO COVID-19

An employee is entitled to take leave related to COVID-19 if the employee is unable to work, including unable to telework, because the employee:

- |   |   |
|---|---|
| 1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;              | 5. is caring for his or her child whose school or place of care is closed (or child care provider is unavailable) due to COVID-19 related reasons; or |
| 2. has been advised by a health care provider to self-quarantine related to COVID-19;                       | 6. is experiencing any other substantially-similar condition specified by the U.S. Department of Health and Human Services.                           |
| 3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis;                                    |   |
| 4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2); |   |

### ► ENFORCEMENT

The U.S. Department of Labor's Wage and Hour Division (WHD) has the authority to investigate and enforce compliance with the FFCRA. Employers may not discharge, discipline, or otherwise discriminate against any employee who lawfully takes paid sick leave or expanded family and medical leave under the FFCRA, files a complaint, or institutes a proceeding under or related to this Act. Employers in violation of the provisions of the FFCRA will be subject to penalties and enforcement by WHD.



WAGE AND HOUR DIVISION  
UNITED STATES DEPARTMENT OF LABOR

For additional information  
or to file a complaint:  
**1-866-487-9243**  
TTY: 1-877-889-5627  
[dol.gov/agencies/whd](https://dol.gov/agencies/whd)



WH1422 REV 03/20

## Download the FFCRA Poster

[https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA\\_Poster WH1422 Non-Federal.pdf](https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA_Poster_WH1422_Non-Federal.pdf)

# Questions

Thank you Rediger  
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For more information about the  
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<https://capfamilybus.org/>



Capital Region  
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Next Webinar, Monday, April 20

Investing Through Crisis

Presented by:

Nathan Torinus, Genovese Burford & Brothers