

I Need a Leave from Managing Leave!

Best Practices for Navigating Leave
Under the ADA, FMLA and PWFA

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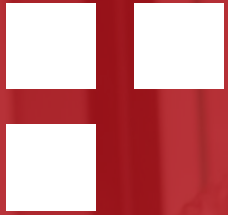
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Live Course Code #1:
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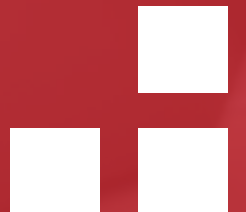


On-Demand Course
Code #1: **SAMPLE**



Introduction

Employer obligations, overlapping laws, and the risks of getting leave wrong





Introduction / Agenda

- Introduction
- Evaluating Leave and Accommodation Requests
- Navigating the Interactive Process
- Managing Intermittent and Reduced-Schedule FMLA
- Managing Leave Under the PWFA



Evaluating Leave Accommodation Requests

Spotting the request and assessing it individually



ADA: The Basics

Coverage

Title I of the Americans with Disabilities Act ("ADA") applies to employers with 15 or more employees. Enforced by the EEOC. Covered employers must provide reasonable accommodation to qualified individuals with disabilities, absent undue hardship or direct threat.

Accommodation

Many forms of possible accommodations. For example: removal of non-essential job functions; equipment modification or assistance devices; scheduling changes; breaks; service animals.

**A leave of absence may be a reasonable accommodation.*

Risk point

Exhausting FMLA, workers' compensation, or employer-provided leave does not automatically end ADA obligations.

State and local laws may provide additional disability accommodation and leave rights beyond federal law and should be reviewed as applicable.

CORE FRAMEWORK

Employee Request / Triggering Process

- Request for leave need not be on any particular form or in a particular format
- Listen for the need . . . not legal terminology
 - "My new medications make me exhausted and lightheaded. I can't get to work."*
- Or could be in the form of . . .
 - Completing the employer's standard form
 - Exhaustion of other leave (e.g., FMLA) and inability to RTW
 - Note form HCP

Frontline supervisors / managers play a key role in listening and triaging. Training is critical!

Two Distinct ADA Leave Obligations

The first asks whether the employee is treated equally. The second asks whether the ADA requires something else.

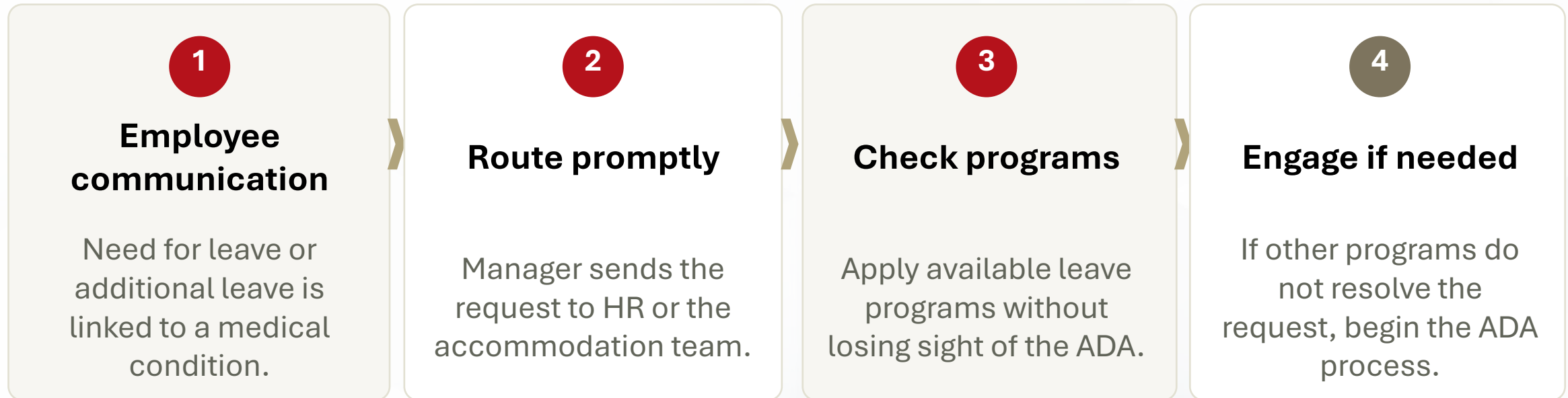
1. Equal access to existing leave

- Same eligibility rules
- Same documentation rules
- Same approval standards
- No disability-specific barriers

2. Leave as a reasonable accommodation

- May require unpaid leave, even if not eligible for other available leave
- May require an exception to a cap
- May apply after other leave is exhausted
- Subject to individualized undue-hardship review

Recognizing an Accommodation Request



- ✓ Pause automated termination while ADA review is pending
- ✓ Work comp / disability benefits commence as and when appropriate
- ✓ Document decisions and handoffs consistently

Course Code #1

*At the end of the session, simply scan the QR code for **live** or **on-demand** session to enter the course codes.*

Course Code #1

Live Course Code #1: **Leave-Live**



Attending on **October 20**:
Use Live Course Code

Please make sure to **record these codes accurately**, and at the end of the session, simply scan the QR code to enter the course codes and confirm your attendance.

ON-DEMAND COURSE CODE

On-Demand Course Code #1:
OD-Leave



Attending on **On-Demand** (after 10/20/26):
Use On-Demand Course Code



Navigating the Interactive Process

Communication, documentation, and coordination throughout leave



The Interactive Process

WHY

WHY

What disability-related reason makes leave necessary?

WHAT

WHAT

Block leave, reduced schedule, or intermittent absences?

WHEN

WHEN

What is the expected or approximate return date?

OTHER

OTHER?

Could another accommodation avoid or shorten the leave?

Key Points:

- ✓ Informal dialogue with employee to understand situation and potential accommodation
- ✓ Individualized and specific to the situation
- ✓ Follow-up conversations with written communications – emails or letters (e.g., summarize meetings; outline next steps; etc.)
- ✓ May require obtaining medical documentation

Medical Documentation

Request enough information to decide the accommodation, not a complete medical history

What may be relevant

- ADA-covered condition, if not obvious
- Functional limitations / work restrictions
- Why leave is needed
- Amount and duration
- Frequency of intermittent leave (is it foreseeable or not)

Return-to-work focus

- **Expected return date**
- Restrictions at return
- Alternative accommodations
- Whether less leave could be effective

Process safeguards

- Obtain employee permission before provider contact
- Ask focused questions
- Seek clarification when necessary
- Expect reasonable cooperation

Has the employee broken down the interactive process?

Is employee seeing the appropriate provider?

An employer can require the employee see an appropriate health care provider or specialist qualified to evaluate the condition (e.g., mental health therapist; neurologist).

Employer may require employee to see HCP of its choosing if:

1. Employee provides insufficient information in response to the employer's initial request.
2. The employer pays all costs for the visit.

Consider offering a choice

Let the employee either find their own health care provider or visit one referred by the employer.

Key Points for Letter to Employee for HCP

1



Establish the background (e.g., Performance issues; behaviors; medication usage; etc.)

2



Include job title and job description

3



List out questions to be answered by HCP

4



Include Genetic Information Nondiscrimination Act ("GINA") statement

5



Consider requiring HCP to sign letter

The ADA is Not a Leave-of-Absence Law*

Generally, a leave of absence may be a reasonable accommodation when it is:

1. For a definite or reasonably ascertainable period
2. Supported by medical information; and
3. Reasonably likely to enable the employee to return and perform the essential functions.

ADA generally does not require an employer to provide:

- An indefinite leave
- Leave with no reasonably foreseeable return-to-work date
- Leave based only on possibility that the employee may be able to return to work at some unknown date in the future
- Intermittent leave that is sporadic, unpredictable, and frequent

However:

***Conduct individualized assessment for each request**

***Employer MUST consider court rulings in their federal and state jurisdictions, AND state and local laws.**

Leave Types

SPECIFIC

“Return November 10”

May be reasonable; assess the facts.

APPROXIMATE

“Late November” or a medically supported range

May be reasonable; assess the facts.

INDEFINITE

Cannot say whether or when return will be possible

Generally, need not be provided as an accommodation.

Illustrative Cases

Outcomes are very fact sensitive, so important to conduct the individualized assessment!

"Severson v. Heartland Woodcraft" - 7th Cir. (2017)

- EE unable to RTW following FMLA exhaustion due to bad back – has surgery on last day of FMLA (Aug. 27)
- Two weeks prior, EE asked for leave extension to recover from surgery (approx. 2 months)
- ER denies / EE sues arguing three accommodations wrongfully denied - (1) leave (2) transfers to vacant job (3) light-duty
- Court rules for ER on SJ – finds EE not a qualified individual under ADA - *"Simply put, an extended leave of absence does not give a disabled individual the means to work; it excuses his not working."*
- Distinguished a multi-month leave from an intermittent or a short period of leave, such as a few days or weeks that might be reasonable
- As to transfer - EE never proved existence of vacant positions / As to light duty – ER did not have an applicable light-duty policy

"Rogers v. NYU" - S.D.N.Y. 2002

- EE on FMLA leave and exhausted it Nov. 1997
- Doctor's note then indicates EE could return in 1 – 2 months, with estimated RTW date of Jan. 2, 1998 (RTW for EE with "limited stress")
- ER terminates EE on Nov. 17, 1997
- ER has "separate and independent set of obligations under the ADA . . ." beyond FMLA
- ER argues EE could not regularly attend work at time of termination and claims she sought indefinite leave
- Court denies SJ for ER, rules that a 6-week leave extension is not a request for "indefinite" leave, even if RTW is not guaranteed
- Court recognized EE will have significant burden to demonstrate how extension of leave would enable her to RTW and handle stress of job

Illustrative Cases Cont.

Outcomes are very fact sensitive, so important to conduct the individualized assessment!

"Whitaker v. WI Dept. of Health" - 7th Cir. (2017)

- EE requests and is approved for FMLA Aug 27 - Sept 10
- Doesn't RTW, but seeks leave until Dec 27
- ER approves to mid-Oct when FMLA ends but invites EE to apply for 30-day personal leave per policy
- EE requests 60+ days of personal leave to Dec 28
- ER approves to Nov 8 / EE submits two doctor's notes (one requesting leave to Nov 17 and the other to Dec 17 - no additional information provided)
- ER gives her chance to meet on Nov 18 to discuss and submit more documentation (she brings nothing)
- ER terminates employment on Nov 30 / EE sues
- 7th Circ. upholds lower court in favor the ER, holding that EE has a disability but failed to show she is otherwise qualified
- Court highlights lack of detail in doctor's notes re: EE's condition; course of treatment; and likelihood of recovery

***Employer had ongoing dialogue with EE and provided several opportunities for input and update.**



Common Mistakes to Avoid When Managing Leave



Maximum-Leave Policies

A policy cap can be valid, yet still require an exception

POLICY LIMIT

Be Careful with Rigid
Enforcement of
Leave Policy Caps



INDIVIDUALIZED ADA REVIEW

- Is additional leave disability-related?
- Is the period reasonably defined?
- Could another accommodation permit return?
- Would an exception create undue hardship?

Avoid Problems with Automated Notices

Rewrite “return or be terminated” letters to preserve the accommodation process.

Risky message

“Return by the stated date or your employment will be terminated.”

This framing can cause an employer or vendor to bypass an individualized ADA review.

Be careful of TPA automatic termination notices

Better notice elements

- How to request additional leave
- The correct contact person
- Information that may be needed
- Individualized evaluation must be completed
- No promise of approval
- Undue-hardship qualification

Return to Work: Reject “100% Healed” Rules

Restrictions trigger analysis, not automatic exclusion

Not the ADA standard

- No restrictions
- Full duty only
- 100% recovered



Individualized standard

- Can essential functions be performed?
- Would an accommodation be effective?
- Is there objective evidence of direct threat?
- Could accommodation reduce the risk?

Forgetting Reassignment to Another Vacant Position as a Potential Accommodation

When to consider

The employee cannot perform the current job's essential functions, even with accommodation, or accommodation in the current job would create undue hardship.

EEOC / Courts

Transferring a qualified employee into an appropriate vacant position without requiring competition is a reasonable accommodation. Work with employee to review the list of vacant jobs.

Important caveats

Employee must meet minimum qualifications for the job.

Employee need not be most qualified to be entitled to job.

Employer need not transfer someone to a vacant position when another employee entitled to the position under a uniformly-applied seniority system.

Thinking Inconvenience = Undue Hardship

Move from generalized inconvenience to specific operational evidence

Leave characteristics

- Amount and duration
- Frequency of intermittent leave
- Predictability and scheduling flexibility
- Leave already taken

Operational consequences

- Coverage and coworker impact (e.g., only one coworker has same skill or qualification as employee on leave / over-burden on remaining employee)
- Overtime or replacement costs – how significant and for how long?
- Deadlines, contracts, and client service
- Employer size and resources

***Have meeting with manager and HR to assess and document the connection between requested leave and the actual hardship**

Do Not Penalize EEs for Using ADA Leave

Approved accommodation leave must remain effective in practice

Do not

- Count approved leave as an attendance violation
- Discipline for the approved absence
- Rate performance based on work not done during leave
- Deny opportunities because accommodation was requested
- Retaliate

Do

Evaluate legitimate performance and conduct during the periods the employee actually worked, while accounting for the approved leave arrangement

NON-RETALIATION

Common Employer Mistakes

Nine recurring failure points to address in policy, training, and case review

**01 FMLA exhaustion =
termination**

**02 Automatic application of
leave caps**

**03 “100% healed”
requirement**

**04 Disability-specific
documentation**

**05 Penalizing for missing
work on approved leave**

**06 Vendor-triggered
termination**

**07 No return-to-work
analysis**

**08 No transfer /
reassignment review**

**09 Conclusory hardship
finding**

Communication During Leave

Appropriate checkpoints

- No reasonably specific return date
- The anticipated date changes
- The employee requests an extension
- Return-to-work accommodations may be needed
- A check-in near the scheduled return

Avoid unnecessary demands

When leave was granted through a fixed date, do not require needless periodic medical updates. A supportive progress check or return-planning contact may be appropriate.

STY

Policy and Form Review Checklist

Review for compliance and best practices



Maximum-leave provisions



No-fault attendance rules



Full-duty / 100% healed language



End-of-leave letters



Medical certification forms



Job descriptions



Return-to-work procedures



Accommodation forms



Vendor communications



Termination approvals

Recommended Employer Process

A repeatable workflow improves consistency and preserves individualized review.



Key Takeaways

- 1** Equal access is only the starting point.
- 2** Unpaid leave may remain available after other leave ends.
- 3** Policy caps require individualized review.
- 4** Is the length of leave for a definite or reasonably ascertainable period of time?
- 5** Avoid “100% healed” requirements and other common leave management mistakes.
- 6** Undue hardship determination needs specific supporting facts.
- 7** Document the interactive process steps and communications taken with employee.
- 8** Coordination among HR, managers, and vendors is essential.

TAKEAWAYS



Managing Intermittent and Reduced-Schedule FMLA Leave

Tracking intermittent and reduced-schedule FMLA leave
Managing certifications and leave usage
Navigating overtime, transfers, and overlapping leave laws



Family and Medical Leave Act (FMLA)

The Basics

- **Leave entitlement:** Up to 12 workweeks in a 12-month period for qualifying family and medical reasons.
- **Employee Eligibility:** Worked for a covered employer for at least 12 months and completed 1,250 hours of work during the preceding 12-month period.
- **Core protections:** Unpaid leave, continued group health coverage, and return to the same or an equivalent job.
- **Continuous leave:** One uninterrupted period away from work.
- **Intermittent leave:** Separate blocks of time for a single qualifying reason.
- **Reduced schedule:** A reduction in usual daily or weekly work hours.
- **Military caregiver leave:** Up to 26 workweeks in a single 12-month period.

Tracking FMLA Intermittent and Reduced-Schedule Leave

Create a consistent record that connects the certification, the schedule and each absence

Record	What the Leave Administrator Needs
Approved parameters	Qualifying reason, certification period, estimated frequency of absences, and estimated duration of each absence
Scheduled work	Regular shifts, required overtime and the applicable workweek
Each absence	Date, start/end time, hours missed and the employee's reporting that it was an FMLA absence
Leave accounting	FMLA time charged, running balance, concurrent PTO or state leave, notices and follow-up dates

- Reconcile the leave log with timekeeping and payroll. Keep medical records confidential.

FMLA Certification Estimates and Actual Absences

Compare frequency and duration without treating the estimate as an automatic cap

The certification baseline

- Expected episodes over the stated period
- Expected length of each episode
- Planned treatment and recovery needs
- ***Confirm a complete, clear certification.***



The actual absence record

- Episodes reported and time missed
- Whether the same qualifying reason applies
- Changes in frequency, duration or timing

When the record differs

- Clarify discrepancies and assess whether recertification is permitted before treating additional absences as unprotected.”

FMLA Recertification When Circumstances Change

Timing limits matter even when the absence pattern raises questions

Ordinary timing

Generally, no more often than every 30 days, and only in connection with an absence.

If the certified minimum duration is longer, generally wait until it expires. Recertification may be requested every six months in connection with an absence.

Earlier recertification may be allowed

The employee requests an extension of FMLA leave.

Frequency, duration or severity changes significantly.

New information casts doubt on the stated reason or the certification's continuing validity.

Ordinarily provide 15 calendar days for the employee to provide recertification.

FMLA Absence Patterns and Potential Misuse

Evaluate FMLA absences objectively drawing conclusions.

- 1 Identify an objective pattern**

Compare leave dates, frequency and duration with the certification and employee's schedule.
 - 2 Seek an explanation**

Confirm the reported reason and any changed circumstances.
Apply call-in rules consistently.
 - 3 Use the appropriate process**

If recertification is permitted, provide the attendance record and request the health care provider whether the pattern is consistent with the condition.
- Before discipline, separate protected leave from a substantiated policy violation or fraud.**

On-Call Work and Overtime

The question is what work the employee would have been required to perform



Required overtime

If the employee cannot work required overtime for an FMLA reason, count the missed required hours under the FMLA calculation.

Voluntary overtime

Do not charge FMLA leave for overtime the employee was free to decline.

On-call assignments

Determine what work the employee was required to perform and whether leave notice was adequate. Evaluate entitlement to on-call pay separately.

Temporary Transfer During Recurring Leave

A limited scheduling tool for foreseeable leave based on planned medical treatment



When it may fit

An available alternative position better accommodates recurring leave. The employee must be qualified for the position.

What must stay equivalent

Pay and benefits must remain equivalent. The position does not need identical duties.

Guardrails

Do not use transfer to discourage leave or create a hardship. Do not treat unpredictable episodes as automatic grounds for transfer.

Restoration

When the recurring leave ends, restore the employee to the same or an equivalent job.

FMLA and State Paid-Leave Coordination

Evaluate each obligation separately, but run concurrently when possible

- 1 Coverage and protection**

Identify the applicable state program. Compare eligibility, covered reasons, family definitions and job-restoration rights.
- 2 Concurrent designation**

When an absence also qualifies for FMLA, designate it as FMLA leave and provide required notices. Track each program's entitlement separately.
- 3 Wage replacement and PTO**

During state/local paid benefits, neither party may require PTO substitution. Supplementation requires mutual agreement where state law permits. PTO substitution rules resume when benefits end and FMLA leave becomes unpaid.
- 4 Operational reconciliation**

Align intermittent claims, timekeeping and payroll. Check program increments, deadlines and employee reporting duties.

Policy and Form Review Checklist

Test whether the documents work together in an actual intermittent-leave case



POLICIES AND INSTRUCTIONS

Reporting rules

Is the handbook, call-in and instructions regarding using FMLA leave consistent?

Pay and protection

Do materials distinguish PTO or benefit payments from protected-leave status?

Training and escalation

Do managers know where to refer questions?

FORMS AND SYSTEM OUTPUTS

Certification and follow-up

Are the forms complete, responsive, and unambiguous? If no, has clarification been requested?

Notices and correspondence

Do templates state the next step, responsible contact and applicable deadline pursuant to FMLA?

Timekeeping and closure

Do reports flag unresolved entries and show separate balances for overlapping programs?

Audit test: trace one absence from the employee's call to the final payroll and leave records.

Key Takeaways

Five priorities for managing FMLA leave.

- 1** Leave management continues after designation and approval of FMLA Leave.
- 2** Obtain complete, clear medical certification that provide the baseline.
- 3** Review potential misuse objectively. Estimates are not automatic caps.
- 4** Use recertification only on permitted grounds and timing.
- 5** Coordinate concurrent leave, notices and separate balances.

Course Code #2

*At the end of the session, simply scan the QR code for **live** or **on-demand** session to enter the course codes.*

Course Code #2

Live Course Code #1: **Complex-Live**



Attending on **October 20**:
Use Live Course Code

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ON-DEMAND COURSE CODE

On-Demand Course Code #2:
OD-Complex



Attending on **On-Demand** (after 10/20/26):
Use On-Demand Course Code



Managing Leave Under the PWFA

*Known pregnancy-related limitations
Temporary modifications at the workplace
Leave of absence as a last resort*



Pregnancy Workers Fairness Act

When Does It Apply?

- Effective in June 2023 with EEOC's Final Regulations effective in June 2024.
- Applies to **accommodations** only for a qualified employee or applicant with a known limitation.
 - Leave is considered to be an accommodation of last resort.
 - Known limitations may be physical or mental conditions.
 - **“Qualified individual” if:**
 - the inability to perform the essential function is for a temporary period;
 - the employee will be able to perform the essential function in the near future; and
 - the employer can reasonably accommodate the employee's inability to perform the essential function.



What the PWFA Adds to Leave Management

One Request May Trigger Separate FMLA, ADA, and PWFA Analyses

WHAT PWFA ADDS	LEAVE-MANAGEMENT IMPACT
Separate analysis	Assess each law separately. FMLA ineligibility or exhaustion, or the absence of an ADA disability, does not end the PWFA inquiry.
Alternatives to leave	Consider whether another accommodation can keep the employee working.
Flexible forms of time away	Assess schedule changes, intermittent absences and continuous leave.
Undue hardship analysis	Evaluate the actual difficulty or expense of the PWFA accommodation requested or identified.

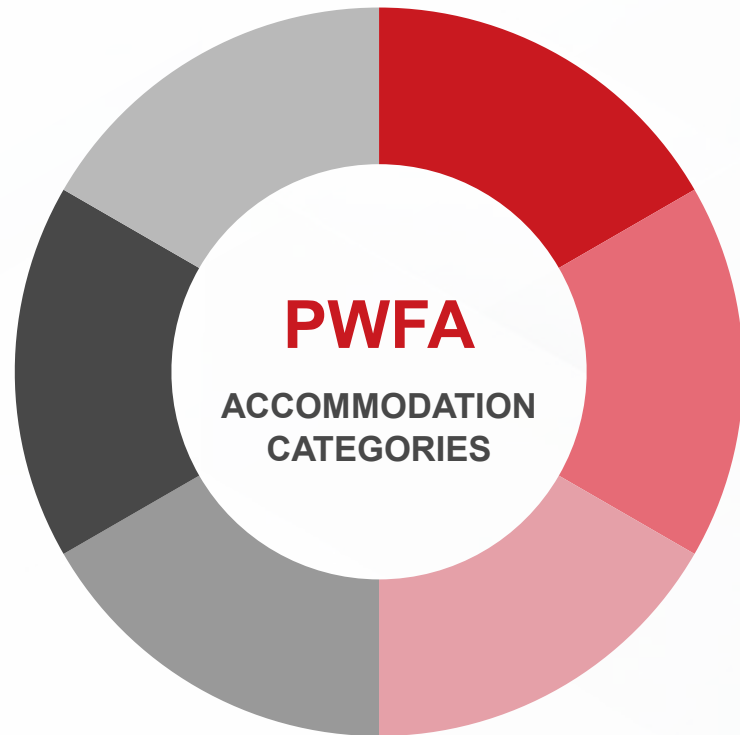
Pregnancy Workers Fairness Act

Known Limitations

CATEGORY	NON-EXHAUSTIVE EXAMPLES	CATEGORY	NON-EXHAUSTIVE EXAMPLES
Pregnancy and reproductive health	Current, past, potential, or intended pregnancy; infertility; fertility treatment; contraception; menstruation; endometriosis	Musculoskeletal and neurological conditions	Sciatica; lumbar lordosis; carpal tunnel syndrome; chronic migraines; loss of balance; vision changes
Labor and childbirth	Labor; preterm labor; vaginal delivery; cesarean delivery; pelvic prolapse; nerve injuries; cesarean or perineal wound infection	Common pregnancy-related symptoms	Hyperemesis gravidarum; nausea or vomiting; dehydration; edema; frequent urination; incontinence; hemorrhoids; varicose veins; vaginal bleeding; hormonal changes
Pregnancy loss or termination	Miscarriage; stillbirth; abortion; ectopic pregnancy	Mental-health conditions	Antenatal anxiety, depression, or psychosis; postpartum anxiety, depression, or psychosis
Cardiometabolic and blood-related conditions	Maternal cardiometabolic disease; gestational diabetes; preeclampsia; HELLP syndrome; anemia; high blood pressure	Lactation-related conditions	Lactation; low milk supply; engorgement; plugged ducts; mastitis; fungal infections

Pregnancy Workers Fairness Act

Possible Workplace Modifications



Illustrative categories, not proportions

- **BREAKS AND SCHEDULES**
More breaks, shorter hours or later starts
- **JOB DUTIES**
Light duty, job restructuring, or suspended essential functions
- **WORK LOCATIONS**
Remote work or a change of work site
- **FACILITIES AND EQUIPMENT**
Accessible facilities, seating or modified equipment
- **LEAVE OF ABSENCE**
Intermittent, reduced-schedule, or continuous leave for appointments, treatment, childbirth, recovery
- **LACTATION SUPPORT**
Breaks, private space and pumping support

- An employer cannot require an employee to take leave if another reasonable accommodation can be provided.
- No PWFA accommodation is required if it causes undue hardship: significant difficulty or expense.

Responding to a PWFA Accommodation Request

The interactive process and documentation limits

Recognize the request

No special words or written request are required. The employee must communicate a limitation and a need for a workplace adjustment.

Engage promptly

Discuss the limitation, the adjustment needed, and potential reasonable accommodations.

Reassess before denial or ending an accommodation

Revisit the employee's needs and available accommodations before denying or ending an accommodation.

Limit documentation

Request documentation only when needed to confirm the limitation and the accommodation. Do not automatically require a doctor's note.

Consider predictable assessments

Certain common accommodations will ordinarily be reasonable and should be provided without unnecessary delay.

Do not default to leave

Do not require leave if another reasonable accommodation permits continued work.

Leave as a PWFA Accommodation

PWFA does not provide a fixed bank of leave, but leave may be a reasonable accommodation.

Time Away

Appointments, treatment, childbirth, recovery or recuperation

Flexible Leave

Intermittent absences, reduced hours, part-time work or schedule changes

Continuous Leave

A defined period away when leave is needed to address the known limitation

The Core Questions

- 1 What time away is needed to address the known limitations?
- 2 What is the anticipated frequency, duration, or expected return date?
- 3 Could another reasonable accommodation allow the employee to remain working?
After leave, can the employee perform the essential functions, with or without another reasonable accommodation?
- 4
- 5 What actual difficulty or expense would result from the requested accommodation?

- Clarify the accommodation request through the interactive process.
- Do not require documentation when the limitation and need are obvious or otherwise subject to PWFA's documentation restrictions.

“In the Near Future”: What Does It Mean for Leave?

PWFA Leave and Temporary Suspension

A. PWFA leave as an accommodation

- After leave, can the employee perform the essential functions, with or without another reasonable accommodation?
- The duration of PWFA leave is evaluated through the individualized reasonable accommodation and undue hardship analysis, not by applying the “in the near future” standard.

B. PWFA temporary suspension

An essential function may be temporarily suspended if the employee:

- Is temporarily unable to perform the function;
- Can resume it “in the near future”; and
- Can be reasonably accommodated during the suspension.

“In the near future”

Current pregnancy

Generally, within 40 weeks from the start of the temporary suspension.

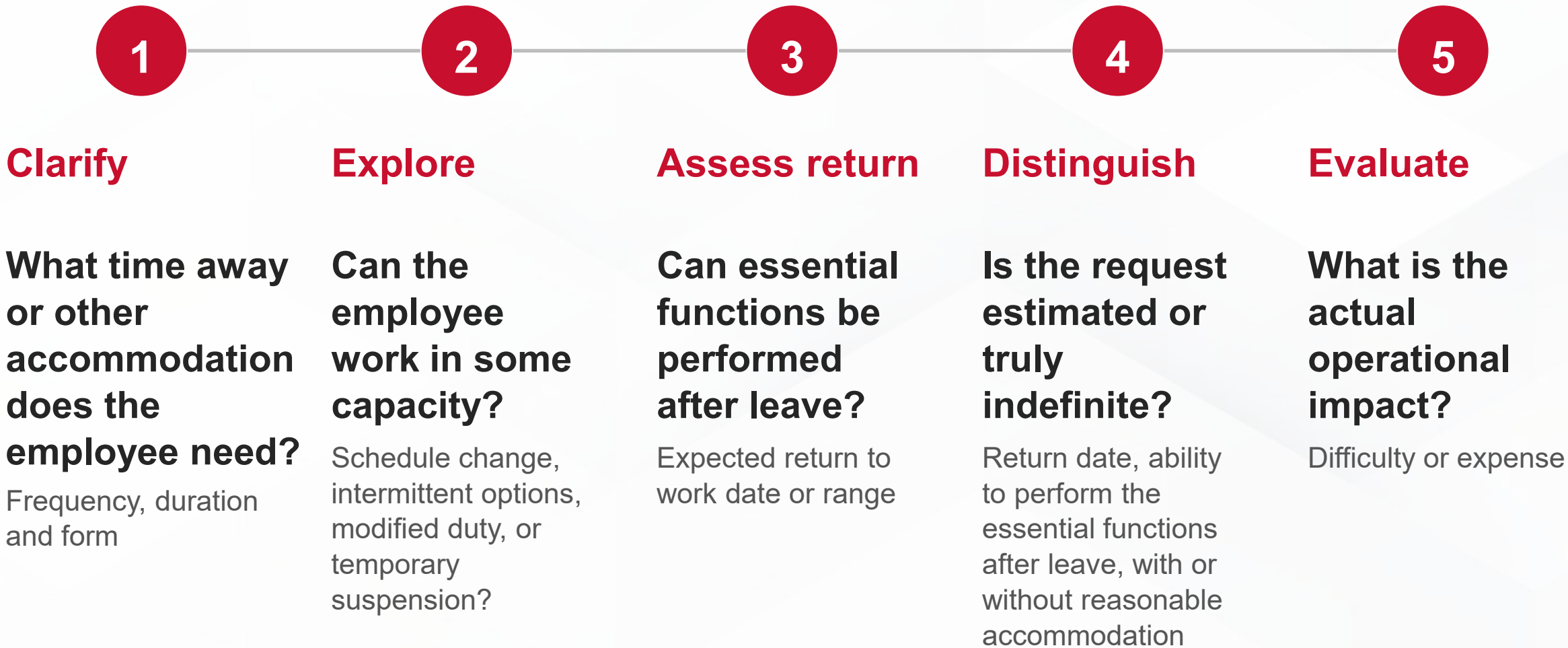
Other covered conditions

Case by case. A date range or estimate is not necessarily indefinite.

“In the near future” governs temporary suspension of an essential function, not the length of PWFA leave.

PWFA Leave-Management Workflow

Five questions before approving, denying or ending leave under PWFA



PWFA Key Takeaways

Six priorities for recognizing and meeting PWFA obligations

- 1 Recognize requests without special words or a written form.**
- 2 Apply PWFA separately from FMLA and ADA eligibility.**
- 3 Engage promptly and explore work adjustments.**
- 4 Request documentation only when permitted.**
- 5 Evaluate leave individually. PWFA has no fixed leave bank.**
- 6 Assess actual undue hardship and reassess needs.**

ADA, FMLA and PWFA: Practical Takeaways

Separate legal analyses. A coordinated response for each employee.



ADA

Assess leave and return-to-work accommodations individually. Leave exhaustion does not end the accommodation inquiry.

FMLA

Confirm eligibility and provide required notices. Obtain permitted certification, track actual leave and coordinate overlapping rights.

PWFA

Address known pregnancy-related limitations promptly. Follow documentation limits and consider work adjustments before requiring leave.

The end of one leave entitlement may not end the employer's obligations.

Questions



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Live Course Code #2:
Complex-Live

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Attending On-Demand?

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