

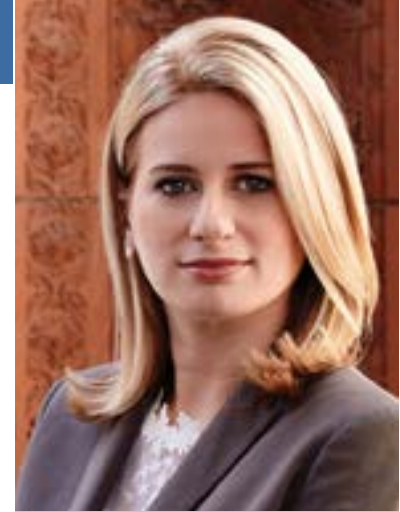
# HOME CARE CLIENT ALERT



## Hodgson Russ Submits Comments to NYS DOL Regarding Proposed On-Call Regulations

January 15, 2019

As we had previously [reported](#) the New York State Department of Labor has published revised proposed regulations that would require employers to pay employees who are subject to short-notice scheduling changes, who are “on-call,” and who are required to call for their schedules under certain circumstances. The proposed regulations are likely to cause many administrative challenges for agencies and fiscal intermediaries, increase overhead and labor costs and, due to ambiguities in the proposed regulations, trigger wage and hour litigation. Hodgson Russ submitted comments to the New York State Department of Labor in response to the proposed regulations, urging the Department to significantly revise and clarify the proposed regulations. The comments explain to the Department the practical challenges and complexities of implementing the proposed regulations, especially for employers in certain industries, like home care. If you would like to read the comments and better understand the difficulties and nuances of the proposed regulations, and what types of challenges your agency or fiscal intermediary may face if the proposed regulations are adopted by the Department of Labor in their current form, please contact [Emina Poricanin](#).



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