

# HODGSON RUSS SUBMITS COMMENTS TO NYS DOL REGARDING PROPOSED ON-CALL REGULATIONS

*Labor & Employment Alert*  
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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 employers, increase overhead and labor costs and, due to ambiguities in the proposed regulations, trigger wage and hour litigation. The labor and employment team at 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. 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 business may face if the proposed regulations are adopted by the Department of Labor in their current form, please contact any member of our Labor and Employment group and request a copy of the comments.

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