

Employer Registration Pursuant to the Connecticut Paid Family Medical Leave Act Has Opened

The Connecticut Paid Family Medical Leave Act, Public Act 19-25, (the "Act") was enacted on June 25, 2019 and established the Connecticut Paid Leave ("CTPL") program. This program covers private-sector employers, except for nonpublic elementary or secondary schools, with one or more employees. It allows for eligible employees to take paid leave to address their personal, family and health needs.

The Act also created the Connecticut Paid Leave Authority ("CPLA"), which is tasked with the implementation and administration of the program. Under the Act, covered employers are required to register with the CPLA. The CTPL program will be funded through employee contributions and employers must withhold and submit payments to the CPLA. Below is important information and key dates concerning employer registration, the collection of wages and the payment of benefits to eligible employees.

Employer Action

Employers should ensure that they (1) register with the CPLA, (2) make payroll deductions and (3) submit employee contributions quarterly. The failure to make appropriate contributions may result in penalties.

1. Employer Registration

Starting **November 1, 2020**, employers covered by the Act may begin registering their businesses with the CPLA online <u>here</u>. The information required for registration will depend on an employer's type of business. Employers should register before December 31, 2020 as employee payroll deductions begin January 1, 2021.

Prior to registering with the CPLA, employers also must have established a state identity with business.ct.gov, which can be done <u>here</u>.

Employers may apply for an exemption if they intend to offer a private plan that provides the same "rights, protections, and benefits" that are provided to employees under the CTPL program. Therefore, employers should consider how their private plan compares to the Connecticut state plan, and whether their plan allows them to qualify for an exemption. It is important to note that a private plan must be approved by a majority of an employer's employees.

2. Payroll Deductions

Employee payroll withholdings begin starting January 1, 2021. Employee contributions may not exceed one-half of one percent (.5%) of an employee's earnings each pay period.

3. Payment Timeline

Covered employers are required to make quarterly payments to the CPLA in accordance with the following timeline:

March 31, 2021: First quarter payments of payroll deductions are due.

June 30, 2021: Second quarter payments of payroll deductions are due.

September 30, 2021: Third quarter payments of payroll deductions are due.

December 31, 2021: Fourth quarter payments of payroll deductions are due.

Employee Benefits

Beginning in Fall 2021, qualifying employees can apply for paid leave benefits. Starting January 1, 2022, qualifying employees will be eligible to receive benefits.

Additional information pertaining to employers about the Act and the CTPL program can be found <u>here</u>.

For further information on the Connecticut Paid Family Medical Leave Act, CTPL program, or employer registration, please contact <u>Christopher L. Brigham</u>, Chair of the Employment Law Practice Group at Updike, Kelly & Spellacy, P.C. at (203) 786-8310 or <u>cbrigham@uks.com</u>, <u>Andrew</u> <u>L. Houlding</u>, Principal in the Employment Law Practice Group at (203) 786-8315 or <u>ahoulding@uks.com</u>, <u>Valerie M. Ferdon</u>, Associate Attorney in the Employment Law Practice Group at (860) 548-2607 or <u>vferdon@uks.com</u>; or <u>Jeffrey Renaud</u>, Associate Attorney in the Employment Law Practice Group at (860) 548-2629 or jrenaud@uks.com.

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