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EMPLOYMENT LAWSCENE ALERT: DOL ANNOUNCES THAT THE PAID LEAVE PROVISIONS OF THE FAMILIES FIRST CORONAVIRUS RESPONSE ACT ARE EFFECTIVE APRIL 1, 2020

In providing general guidance to employers, the U.S. Department of Labor announced that the paid leave provisions of the Families First Coronavirus Response Act ("FFCRA") are effective on April 1, 2020, and not on April 2, 2020 as widely reported. The Family and Medical Leave Expansion Act ("FMLEA") and the Emergency Paid Sick Leave Act ("EPSLA") provide that the requirements to provide paid leave under the FFCRA "shall take effect **not later than 15 days** after the date of enactment of this Act." President Trump signed the FFCRA on March 18, 2020—15 days from March 18th is April 2nd. Obviously, the DOL has interpreted these enabling provisions of the FMLEA and the EPSLA to provide it authority to make these laws effective before April 2, 2020. Because the DOL is responsible for enforcing the paid leave provisions of the FFCRA, all covered employers should provide paid leave benefits under the FFCRA starting **April 1, 2020** to all eligible employees entitled to such paid leave.