Updates to Consolidated Policies July 2025

## **Posted Revisions**

#### Merge Glossary into Consolidated Policies

- Primarily definitions related to the program
- Retire Glossary

#### Employer Eligibility

• Clarify that RESCs and Charter Schools can negotiate to participate via Collective Bargaining Agreement

#### Contributions / Social Security Cap

• Allow "successor employers" to consider earnings under predecessor toward the SS Cap

#### **Claim Documentation**

• Allow confirmation of details in writing, electronically, or verbally, at the Authority's discretion

#### **Employer Portal Claim Access Process**

- Employers now have the option to see limited information about their employees' claims (e.g. approval/denial, dates of approval, and amount of payments)
- Before access is granted, the Authority will require confirmation from employer of right to view claims details (e.g. wage information previously submitted)

### Third Party Authorization

- In case of the inability of employee to participate in claims process, what methods will allow a third party to act on the employee's behalf
- Several options available (Third party authorization form, court appointment, power of attorney, executor of estate in case of death, or health care provider certification of inability to participate in claims process)
- Payments can still only be made to the claimant themselves or to their estate



### **Updates**

### One public comment:

Asked that we confirm the definition of Bonding Leave is consistent with the CT FMLA statutes

- No changes were made to the policies. The definition of Bonding Leave captures the elements of:
  - Conn. Gen. Stat. §31-51ll(a)(2)(A)&(B) Leave taken "(A) Upon the birth of a son or daughter of the employee; (B) Upon the placement of a son or daughter with the employee for adoption or foster care;" and
  - The further description of qualifying events found in Regs., Conn. State Agencies §31-51qq-7(d) leave can be granted "before the actual placement or adoption of a child if absence from work is required for the placement for adoption or foster care to proceed. For example, the employee may be required to attend counseling sessions, appear in court, consult with his or her attorney or the doctor(s) representing the birth parent, submit to physical examination, or travel to another country to complete an adoption."

Added Definitions based on the last Policy & Personnel Committee Meeting discussion:

- Definitions of child, son, daughter, family member, grandchild, grandparent, health care provider, parent, sibling, and spouse were added
- Definitions include citation to the statute, along with the definition itself



New Revisions to Consolidated Policies

## Public Act 25-174

## Participation by "Public School Operators" and non-public elementary and secondary schools

- Applies to employees in positions that do not require certification under Chapter 166 of Conn. Gen. Stat.
- Employees in positions requiring certification remain exempt (though can negotiate via Collective Bargaining Agreement, if Public School Operator)

# Allows for alternate calculation of Base Period/Base Weekly Earnings for these school employees

• Intent is to avoid variation in paid leave eligibility or benefit amounts, based on how employees pay is structured



## **Alternate Calculation**

Unintended consequence for paid leave benefits, based on how employees elect to be paid. School employees may have options available.

3 examples below of employees who have the same annual earnings (\$30,000), all work only during the 10 months of the school year, but are paid on different schedules:

	<b>Employee 1</b> Paid over 12 months	<b>Employee 2</b> Paid over 10 months	Employee 3 Paid over 10 months + 1 balloon payment at start of summer			Employee	21	Emplo	oyee 2	Employee 3
					Q3	\$7,500		\$3,000	D	\$2,500
July	\$2,500	\$0	\$0		Q4	\$7,500		\$9,00	h	\$7,500
August	\$2,500	\$0	\$0		4	\$7,500		49,000	5	477500
September	\$2,500	\$3,000	\$2,500		Qı	\$7,500		\$9,00	0	\$7,500
October	\$2,500	\$3,000	\$2,500		-					
November	\$2,500	\$3,000	\$2,500		Q2	\$7,500		\$9,00	0	\$12,500
December	\$2,500	\$3,000	\$2,500							
January	\$2,500	\$3,000	\$2,500						-	
February	\$2,500	\$3,000	\$2,500				Employee 1		Employee 2	Employee
March	\$2,500	\$3,000	\$2,500		Portion of wages in the highest 2 quarters					
April	\$2,500	\$3,000	\$2,500				50%		60%	67%
May	\$2,500	\$3,000	\$2,500							
June	\$2,500	\$3,000	\$7,500							
Total Annual Salary	\$30,000	\$30,000	\$30,000		CTPL Weekly Benefit:		\$547.20		\$644.10	\$690



## **Proposed Revisions**

(The policy draft assumes that the prior drafted revisions have been adopted by the Board)

Minor edits related to definition of "Public School Operators":

- Change the phrase "local or regional boards of education" to "Public School Operators"
  Include Regional Educational Service Centers (RESCs) in definition of Public School Operators
- Update citations due to the changes in the numbering of the definitions section of the statute

Create a calculation of Base Weekly Earnings and eligibility that averages the earnings for the year across the four quarters of the year:

- If employee was a newer hire, only average across the quarters employed
- Calculation does not apply to certified employees that negotiate inclusion via CBA
- Private Plans are allowed to adopt a similar calculation, but are not required to
- Applies only to employees who work only during the school year, and who are given a choice in payment options

The Authority will create an alternate Employment Verification form for these employers, in order to confirm certification requirements of the position as well as the earnings

Goal is to have the policies adopted in the September Board Meeting, just ahead of the October 1 effective date of the law.

