



New Laws 2021

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New Employment Legislation

These laws are effective 1/1/2021 unless stated otherwise.



SR Independent Contractors (AB 2257)

Time Frame: Effective Immediately


Background: Last year, AB 5 codified the “ABC Test” to determine whether a worker qualifies as an independent contractor.

What is the ABC Test?

A worker is presumed to be an employee unless the employer can show that:

- the worker is free from the direction and control of the hiring entity,
- the worker performs work that is outside the hiring entity’s main business; and
- the worker normally performs work in an independent business or occupation that is in the same area as the work that the worker is performing for the hiring entity.

AB 5 carved out some exceptions to application of the stringent ABC Test, under which the previous (and more lenient) test under the Borello case applies.



SR Independent Contractors (AB 2257)

Effect: AB 2257 expands and clarifies AB 5's previous exemptions from the ABC Test

Included:

- content contributors, advisors, producers, narrators or cartographers for certain publications (provided they do not displace existing employees)
- specialized performers hired to teach a class for no more than a week
- appraisers
- registered professional foresters
- home inspectors.

Expands:


- exempt positions under the “business to business” exception to apply to situations where the contracting service provider is free to provide services to other clients, rather than actually providing services to other clients.
- the service provider is providing the service directly to customers of a contracting business as long as its employees are providing services under the name of the business service provider and the business service provider regularly contracts with other businesses.



SR Independent Contractors (AB 2257)

Expands (cont.)


- AB 5's referral agency exception from the ABC Test is expanded, and now the following service providers are covered under this exception:
- graphic design, web design, photography, tutoring, consulting, youth sports coaching, caddying, wedding or event planning, services provided by wedding and event vendors, minor home repair, moving, errands, furniture assembly, animal services, dog walking, dog grooming, picture hanging, pool cleaning, yard cleanup, and interpreting services
- Also, the service provider must be free to contract with other clients, but need not show that they are actually doing so.



SR Independent Contractors (AB 2257)

Exemption:

- Businesses who contract with each other where the services are being contracted for a “stand-alone non-recurring event in a single location, or a series of events in the same location no more than once a week” as long as certain requirements are met, such as:
 - lack of control over the work,
 - a written contract specifying payment amounts, and
 - each individual’s maintenance of his or her own business location
- The written agreement between the parties must include the payment amount, including any applicable rate of pay, for services to be performed, as well as the due date of payment for such services.




SR Worksharing Programs (AB 1731)

Timeframe: EFFECTIVE IMMEDIATELY. These provisions will remain in effect until January 1, 2024, and as of that date are repealed, unless extended by a later enacted statute.

Effect #1: Creates an expedited process for employers to be approved for work-sharing programs.

- Benefits of work sharing programs:
 - Avoid laying off workers
 - Let employers cut the workers' hours and provide for unemployment benefits that allow workers to backfill their lost wages.
 - Allow workers to maintain their health and retirement benefits



SR Worksharing Programs (AB 1731)

Effect #2: AB 1731 provides specific processes for eligibility, approval and maintenance of work-sharing programs, and it requires an internet portal to be created to receive electronic applications by employers wishing to participate in, or renew participation in, the work-sharing program.

Effect #3: Approved work-sharing plan applications submitted by eligible employers between September 15, 2020, and September 1, 2023, to participate in, or renew participation in, the work-sharing program, are deemed approved for one year, unless a shorter plan is requested and approved by the employer.



FEHA: Veteran or Military Status (AB 3364)

Timeframe: Effective 1/1/2021

Background: Employers are prohibited from discriminating against or harassing employees based on these protected characteristics.

Effect: Clarifies that the Fair Employment and Housing Act (FEHA) protects military or veteran status (as opposed to veteran and military status).



CFRA Expansion (SB 1383)

Timeframe: *Effective 1/1/2021*

Background: Under prior law, the California Family Rights Act (CFRA) and Family Medical Leave Act (FMLA) applied to employers with 50 or more employees within a 75 mile radius.

Effect #1: This is a major change for employers with 5 to 49 employees.

Under SB 1383, CFRA now covers employers with five or more employees. The effect of this law is to also repeal the New Parent Leave Act (NPLA) which covered medium size employers, because the expanded CFRA provides all the benefits of the NPLA and more.



CFRA Expansion (SB 1383)

Effect #2: This bill expands the definition of “family members” to a child, parent, grandparent, grandchild, sibling, spouse, or domestic partner.

Effect #3: This law also requires an employer that employs both parents of a child to grant up to 12 weeks of leave to each employee for baby bonding, whereas previously, the employer only had to grant both employees a combined total of 12 weeks of leave.

ACTION REQUIRED: It is important for covered employers (who are now almost all employers) to revise their CFRA leave policies and paperwork accordingly.

Now that there is different eligibility coverage under the CFRA and FMLA, there is more possibility of an employee exhausting leave under one leave law but not the other, which creates the possibility that an employee may receive two- 12 week leaves in one year.




Sick Leave — Designation of Kin Care (AB 2017)

Timeframe: *Effective 1/1/2021*

Background: Currently, employees may use up to half of their accrued paid sick leave to care for a family member, also known as “kin care.”

Effect: This bill provides that the employee has the right to designate sick leave as kin care leave, so that the leave time can be properly tracked as such for purposes of determining the availability of kin care leave and leave for other covered purposes under California’s sick leave law.

ACTION REQUIRED: Employers should modify their sick leave policies accordingly.



SR Victims of Crime or Abuse (AB 2992)


Timeframe: *Effective 1/1/2021*

Background:

Effect #1: This legislation prevents employers from discharging, discriminating, or retaliating against an employee who is a victim of a crime, which caused a physical or mental injury, or a threat of physical injury, regardless of whether any person is arrested for, prosecuted for, or convicted of, committing the crime.

Effect #2: Employers are also required to allow such employees with time off work to:

- seek medical attention for injuries caused by crime or abuse,
- obtain services from prescribed entities as a result of crime or abuse,
- obtain psychological counseling or mental health services related to an experience of crime or abuse,
- participate in safety planning
- take other actions to increase safety from future crimes or abuse.



SR Victims of Crime or Abuse (AB 2992)

Effect #3: The employee within a reasonable time may be required to provide one of the following as certification for the absence:

- A police report,
- A court order protecting or separating the employee from the perpetrator
- Documentation from a licensed medical professional or similar,
- Any other form of documentation that reasonably verifies the crime or abuse occurred.

ACTION REQUIRED: Employers should amend their written policies accordingly.



Extended Time For Bringing DLSE Discrimination/Retaliation Claim (AB 1947)

Timeframe: Effective 1/1/2021

Background: Employees who allege they were discriminated or retaliated against in violation of any Labor Commissioner-enforced law have six months to file a complaint with the Labor Commissioner.

Effect: AB 1947 extends that time to one year.



Representation in Arbitration by Labor Commissioner (SB 1384)

Timeframe: Effective 1/1/2021

Background: Labor Code section 98.4 provided that the Labor Commissioner could represent indigent claimants in *de novo* appeals of Labor Commissioner decisions.

Effect #1: This law expands that to allow the Labor Commissioner to represent claimants who cannot afford counsel in arbitration proceedings, and requires employers to serve petitions to compel arbitration on the Labor Commissioner in Labor Commissioner proceedings.

Effect #2: It also allows the Labor Commissioner to represent claimants in proceedings to determine whether arbitration agreements are enforceable.



SR Secretary of State Reporting and Successor Liability (AB 3075)

Timeframe: This legislation is effective January 1, 2022, or upon certification by the California Secretary of State that the California Business Connect online filing system is implemented, whichever is earlier.

Background: Business entities are required to periodically file a statement of information with the Secretary of State.

Effect #1: This information must disclose whether any officer or director, or, in the case of a limited liability company, any member or manager, has an outstanding final judgment for the violation of a wage order or the Labor Code.

Effect #2: A successor to any judgment debtor shall be liable for any wages, damages, and penalties owed to any of the judgment debtor's former workforce pursuant to a final judgment.

Effect #3: This law expressly authorizes local jurisdictions to enforce more stringent local standards relating to the payment of wages.



SR Reporting Pay Data (SB 973)

Timeframe: On or before March 31, 2021, and each year thereafter

Effect #1: Private employers with 100 or more employees, are required to submit a pay data report to the California Department of Fair Employment and Housing (DFEH) that includes the number of employees by race, ethnicity, and sex.

- This report will include the previous year's W-2 earnings and hours worked for each employee and must be submitted in a searchable and sortable format.
- This information is based on the information that applies at the end of any pay period between October 1st and December 31st. The submission must account for and include all employees who were active as of that pay period.



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COVID-19



Blueprint for a Safer Economy

Governor Newsom's office has established COVID-19 prevention requirements, including specific guidance for car dealerships

Major requirements:

- Perform risk assessment of dealership
- Implement prevention measures (should meet model state guidance and local requirements)
- Prepare written prevention plan
- Educate staff about requirements
- Communicate requirements to customers



Blueprint for a Safer Economy

Major requirements (cont.):

- Require face coverings in designated parts and situations
- Report outbreaks among employees
- Perform employee contact tracing
- Adjust occupancy of facilities based on local spread

Why do this now? If you don't have a plan, it's still worth doing. Failure to comply with local guidance could give rise to liability from employees or customers, and enforcement from state or local enforcers.



Supplemental Paid Sick Leave for Larger Employers (AB 1867)

Timeframe: Effective Immediately, these provisions are currently in effect through December 30, 2020 only.

Effect #1: This legislation expands Coronavirus paid sick leave coverage to employers who have not been covered under the federal Family First Coronavirus Response Act (FFCRA).

Effect #2: It establishes Coronavirus paid sick leave coverage to employees of private sector businesses of 500 or more employees and certain emergency responders and healthcare providers.



SR Supplemental Paid Sick Leave for Larger Employers (AB 1867)

Effect #3:

a) Covered employees who are required to leave their home to perform their jobs are eligible for up to 80 hours of paid sick leave when they are unable to work due to any of the following reasons:

- The employee is subject to a federal, state, or local quarantine or isolation order related to COVID-19.
- The employee is advised by a health care provider to self-quarantine or self-isolate due to concerns related to COVID-19.
- The employee is prohibited from working by the employer due to health concerns related to the potential transmission of COVID-19.

b) The full 80 hours of paid sick leave is available if:

- the employer considers the employee to work “full time,” or
- the employee worked or was scheduled to work, on average, at least 40 hours per week for the employer in the two weeks preceding the date the employee took COVID-19 supplemental paid sick leave.



SR Supplemental Paid Sick Leave for Larger Employers (AB 1867)

Effect #3 (cont):

- c) Otherwise, the amount of sick leave under this law is determined as follows:
- If the employee has a normal weekly schedule- the total number of hours the covered worker is normally scheduled to work over two weeks.
 - If the employee works a variable number of hours- 14 times the average number of hours the employee worked each day for the employer in the six months preceding the date the employee took COVID-19 supplemental paid sick leave.



SR Supplemental Paid Sick Leave for Larger Employers (AB 1867)

IMPORTANT:

- ❖ The employer may not deny this supplemental paid sick leave based solely on a lack of certification from a healthcare provider, and that a healthcare provider's certification cannot be a condition of providing this paid leave.

However, it may be reasonable in certain circumstances to ask for documentation before paying the sick leave when the employer has other information indicating that the worker is not requesting the paid sick leave for a valid purpose.

Example: If the employee qualifies for this paid sick leave because they are subject to a quarantine order to stay at home, but the employer subsequently learns that the worker was at a park, the employer could reasonably request documentation.

- ❖ Employers may not require use of any other paid sick leave or paid or unpaid time off prior to or in lieu of using paid sick leave under this law.



SR Supplemental Paid Sick Leave for Larger Employers (AB 1867)

Effect #4: Pay

- The employee is paid for the leave time at a rate that is the greatest of:
 - local minimum wage,
 - state minimum wage, or
 - the regular rate of pay, up to a maximum of \$511 per day or \$5,110 per employee.
- An employer who provided leave for one of these specified reasons prior to the effective date, but at a rate lower than specified, may retroactively compensate employees for the pay differential.



SR Supplemental Paid Sick Leave for Larger Employers (AB 1867)

Effect #5: A credit is available to an employer who provided leave for specified reasons in accordance with the Executive Order or the requirements of federal law or any local ordinance.

ACTION REQUIRED #1: Covered employers must take note of the new pay stub obligations!

Similar to general paid sick leave under California law, employers are required to provide employees with written notification of the amount of this supplemental COVID-19 paid sick leave available on employees' itemized wage statements or a separate writing.

Such information must be provided no later than the pay period following the law's enactment on September 9, 2020.

ACTION REQUIRED #2: Notice to employees- The California Labor Commissioner has issued a model notice for employers to provide to employees through workplace postings, and/or electronically to employees who do not frequent the worksite.



Workers' Compensation Presumption (SB 1159)

Timeframe: EFFECTIVE IMMEDIATELY

Background: Expands workers' compensation to include COVID-19

Effect #1: A *rebuttable* presumption exists that an employee contracted COVID-19 at work if:

- the employee works for the employer with five or more employees,
- the employee tests positive for COVID-19 within 14 days after reporting to his or her place of employment
- this occurs during a COVID-19 “outbreak” at the employee’s specific workplace.



Workers' Compensation Presumption (SB 1159)

Effect #2: When an employer knows or reasonably should know that an employee has tested positive for COVID-19, the employer must report this to their workers' compensation claims administrator.

Under this law an “outbreak” exists if within 14 calendar days, one of the following occurs at a specific place of employment:

- If the employer has 100 employees or fewer at a specific place of employment, 4 employees test positive for COVID-19.
- If the employer has more than 100 employees at a specific place of employment, 4 percent of the number of employees who reported to the specific place of employment, test positive for COVID-19.
- A specific place of employment is ordered to close by a local public health department, the State Department of Public Health, the Division of Occupational Safety and Health, or a school superintendent due to a risk of infection with COVID-19.

IMPORTANT: Employers may be subject to civil penalties of up to \$10,000 for violating these reporting requirements.



SR Notice of COVID-19 Exposure (AB 685)

Timeframe: 1/1/21

Effect: If an employer receives notice of potential exposure to COVID-19, the employer shall take all of the following actions within one business day of the notice of potential exposure:

- a) Provide a written notice to all employees (including any employee's exclusive representative if applicable), and the employers of subcontracted employees, who were on the premises at the same worksite within the infectious period that they may have been exposed to COVID-19.
- b) Provide all employees who may have been exposed and the exclusive representative, if any, with information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, including, but not limited to, workers' compensation, and options for exposed employees, including COVID-19-related leave, company sick leave, state-mandated leave, supplemental sick leave, or negotiated leave provisions, as well as anti-retaliation and anti-discrimination protections of the employee.



SR Notice of COVID-19 Exposure (AB 685)

c) Notify all employees, and the employers of subcontracted employees and the exclusive representative, if any, on the disinfection and safety plan that the employer plans to implement and complete per the guidelines of the federal Centers for Disease Control.

d) If an employer or representative of the employer is notified of the number of cases that meet the definition of a COVID-19 outbreak, as defined by the State Department of Public Health, within 48 hours, the employer shall notify the local public health agency in the jurisdiction of the worksite of the names, number, occupation, and worksite of employees who meet the definition in subdivision (d) of a qualifying individual.



SR Notice of COVID-19 Exposure (AB 685)

NOTE:

“Worksite” is defined as the building, store, facility, agricultural field, or other location where a worker worked during the infectious period. It does not apply to buildings, floors, or other locations of the employer that a qualified individual did not enter.

In a multiworksite environment, the employer need only notify employees who were at the same worksite as the qualified individual.

The notification should be communicated in a manner the employer normally uses to communicate employment-related information. Written notice may include, but is not limited to, personal service, email, or text message if it can reasonably be anticipated to be received by the employee within one business day of sending and shall be in both English and the language understood by the majority of the employees.



CCPA Updates

 **CCPA Review**

The CCPA is Here!

- Went into effect January 1, 2020
- Enforcement started July 1, 2020
- Regulations finalized August, 2020
- Now is the time to comply. If your dealership has not implemented a CCPA compliance plan and process, it is behind the eight-ball and could be vulnerable to enforcement action
- AG's office has said most enforcement will stem from consumer complaints – focus on consumer expectations



CCPA Updates (AB 25, AB 1281, AB 713)

AB 25: extends the exemption of some employee information from the CCPA, narrows this exemption in 2021

AB 1281: extends the employee and Business to Business exemptions until January 1, 2022

AB 713: exempts certain health information from the CCPA

These laws effectively kick the CCPA can down the road with respect to non-consumer data. However, the likely success of Prop 24 will scramble the future.



Consumer Personal Information Law and Agency Initiative (Prop 24)

Proposition 24 would require qualifying businesses to do all of the following:

- not share a consumer's personal information upon the consumer's request
- provide consumers with an opt-out option for having their sensitive personal information, as defined in law, used or disclosed for advertising or marketing
- obtain permission before collecting data from consumers who are younger than 16
- obtain permission from a parent or guardian before collecting data from consumers who are younger than 13
- correct a consumer's inaccurate personal information upon the consumer's request



Consumer Personal Information Law and Agency Initiative (Prop 24)

Proposition 24 would establish the California Privacy Protection Agency that would have the administrative power, authority, and jurisdiction to implement and enforce the consumer data law.

Currently only the California Attorney General has this authority, and the 2018 CCPA did not provide any additional funding for the AG's office to carry out this authority.

Proposition 24 would require the legislature to appropriate \$10,000 million to the CPPA during each fiscal year.



Consumer Personal Information Law and Agency Initiative (Prop 24)

What this changes:

- Creates new consumer rights businesses must address
- Establishes new enforcement agency

What dealers need to do:

- Understand all data sharing practices
- Identify any use of sensitive personal information
- Strengthen child data safety measures
- Update CCPA program for 2022



Financial Regulation



SR CA Consumer Financial Protection Law (AB 1864)

AB 1864 expands the authority of the Department of Business Oversight (DBO) and renames it the Department of Financial Protection and Innovation (DFPI).

DFPI is modeled after the federal Consumer Financial Protection Bureau (CFPB) and has broad subject-matter jurisdiction over the financial services industry, including expanded authority to oversee important sectors such as debt collectors, credit reporting agencies and FinTech companies.

CCFPL goes into effect on January 1, 2021



CA Consumer Financial Protection Law (AB 1864)

Makes it unlawful for Covered Persons or Service Providers to:

- Engage in any unlawful, unfair, deceptive, or abusive act or practice (UDAAP) with respect to consumer financial products or services
- Offer or provide to a consumer any financial product or service not in conformity with any consumer financial law or otherwise commit any act or omission in violation of a consumer financial law or
- Fail or refuse to permit DFPI from accessing or copying records, establish or maintain records, or make reports or provide DFPI with information.

The department must interpret "unfair" and "deceptive" consistently with Section 17200, *et seq.* of the Business and Professions Code and case law.

The logo consists of the letters 'S' and 'R'. The 'S' is black and the 'R' is blue. They are positioned to the left of the main title.

SR CA Consumer Financial Protection Law (AB 1864)

Who is a Covered Person?

- Any person who offers or provides a consumer financial product or service to a resident of this state.
- Any affiliate acting as a service provider to the person.

Who is a Service Provider?

- Anyone who participates in designing, operating, or maintaining the consumer financial product or service; or
- Anyone who processes transactions relating to the consumer financial product service, other than unknowingly or incidentally transmitting or processing financial data in a manner that the data is undifferentiated from other types of data of the same form as the person transmits or processes.

 **CA Consumer Financial
Protection Law (AB 1864)**

What does this mean?

- The future DFPI will be gain authority over significantly more California financial service providers than the current DBO, the ability to enforce consumer finance laws, and a substantially increased rulemaking authority. These developments may also spur an increase in litigation.

Recommendations:

- Watch as regulations develop
- Review, update, and train on compliant sales practices for vehicle sales, leases, and financial ancillary products



SR AB 908 – Debt Collection Licensing Act

This bill would:

- License and regulate debt collectors
- License debt collection attorneys
- To be administered by the Department of Business Oversight
- Effective January 1, 2020



SR AB 908 – Debt Collection Licensing Act

Who must be licensed?

- Defines “debt collector” using identical language as the Rosenthal Fair Debt Collection Practices Act
- “The term ‘debt collector’ means any person who, in the ordinary course of business, regularly, on behalf of that person or others, engages in debt collection.”
- *May apply to dealers depending on their debt collection*



SR AB 908 – Debt Collection Licensing Act

Licensing Requirements

- Submit to a background check, pay specified application fees, and provide information requested by the commissioner
- Pay annual license fees
- Develop policies and procedures reasonably intended to promote compliance with the DCLA
- File annual and special reports and submit to requests for information as required by the commissioner
- Maintain surety bonds of at least \$25,000
- Submit to examinations by the commissioner at least once every five years, as specified.



SR AB 908 – Debt Collection Licensing Act

Enforcement

- Vests the Commissioner of Department of Business Oversight with regulatory power.
- Commissioner has the power to:
 - Revoke licenses
 - Issue cease and desist letters to debt collectors
 - *Order unlicensed debt collectors to pay relief to consumers*



SR AB 908 – Debt Collection Licensing Act

Recommendations

- Understand your debt collection practices
- Determine whether debt collector license required
- Establish debt collection policy and procedure, even if a license not necessary
- Obtain license, if necessary



Tax Law



SR Split Roll Commercial Property Tax (Prop 15)

Currently trailing in the election results...

Proposition 15 would amend the California State Constitution to require commercial and industrial properties, except those zoned as commercial agriculture, to be taxed based on their market value. The change from the purchase price to market value would be phased-in beginning in fiscal year 2022-2023.

- Includes important exemptions and delays, particularly for small businesses
- Dealers should start planning now on how to handle this change



SR Used Vehicle Sales Tax (AB 85, AB 82)

Requires any licensed used car dealers to collect and remit to the DMV applicable sales tax, measured by the sales price of the vehicle with the registration fee.

This requirement would be effective January 1, 2021.

- The sales tax must be remitted along with the Report of Sale and registration fees to DMV within 30 days from the date of sale.
- Imposes a penalty for failure to timely remit sales tax if that dealer is subject to the DMV penalty for failure to make a timely application for registration.
- Requires used vehicle dealers to continue to file sales tax returns with CDTFA and impose interest and penalties for sales tax not timely paid.



SR Used Vehicle Sales Tax (AB 85, AB 82)

What is the change?

- Used car dealers must collect and remit sales tax with the Report of Sale and registration fees

Who is effected?

- Licensed dealers that are not franchised new car dealers

What needs to be done?

- Change tax collection processes
- Prepare business offices and sales staff

**Additional New Laws
and
Legal Developments**



Extends Pilot Program and ZEV Funding (AB 1864)

Extends the pilot program for alternative license plates and vehicle registrations issued by the DMV until January 1, 2023.

Extends by one year, until January 1, 2022, the requirement that the California Air Resources Board (ARB) dedicate 20% of California Clean Truck, Bus, and Off-Road Vehicle and Equipment Technology Program (Clean Truck Program) to support early commercial deployment of existing zero- and near-zero-emission heavy-duty trucks.



Executive Order Regarding Vehicles

September 23, 2020, Governor Gavin Newsom issued a new Executive Order directing the California Air Resources Board (CARB) to develop regulations that will require all vehicles sold in California in the future be zero-emissions.

- All new passenger vehicles and light trucks sold in California must be zero-emissions by 2035.
- All new medium- and heavy-duty trucks and buses sold and operated in the state be zero-emissions by 2045.



Executive Order Regarding Vehicles

The EO is the most dramatic step yet in what has been a long-term push towards California adopting zero-emissions technology, and should be seen as another sign of the changes coming in the automotive industry.

The devil will be in the details. The EO authorizes CARB to promulgate regulations to achieve these goals – how they choose to implement will be key.

The logo consists of a large black 'S' and a blue 'R' with a white underline. To the right of the logo is the title 'Executive Order Regarding Vehicles' in a bold, black, sans-serif font.

SR Executive Order Regarding Vehicles

Recommendations:

- Follow, join, and help CNCDA as it works with the state as these regulations are promulgated.
- Watch for communications from your factory regarding the EO, including demanding investments in zero-emission infrastructure and staff training.
- Make strategic plans regarding ZEV sales, service, and training.
 - Whatever the fate of this EO, the issue is not going away.

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THANK YOU!!!

The logo features the letters 'S' and 'R' in a stylized font. The 'S' is black with a white outline, and the 'R' is blue with a white outline. To the right of the letters, the word 'Questions?' is written in a bold, black, sans-serif font. The entire logo is positioned to the right of a vertical orange bar that contains two overlapping white circles.

SR Questions?

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