Breakout Sessions – Series 3

KEEP ‘EM COMING!

REDUCING ABSENTEEISM THROUGH EFFECTIVE STRATEGIES

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I. INTRODUCTION

One of the most difficult areas of employment law is traversing the maze of attendance and leaves of absence issues created by Congress, state legislatures, administrative agencies, and the courts. Primarily, such leaves of absence occur under the Family & Medical Leave Act and the Americans with Disabilities Act, and state Worker’s Compensation Laws. The focus of this white paper is primarily on the FMLA and the ADA as they relate to issues involving attendance and how the two laws relate to each other.

Attendance concerns are ubiquitous across employers of all sizes and in all industries and the issue is an important one because of the numerous legal traps created by the ADA & FMLA. While these legal traps may make an employer’s efforts to control attendance problems more challenging, they do not make such efforts futile. And, importantly, this Whitepaper offers some suggestions on how employers can tighten their attendance control efforts and still comply with the law.

II. THE CONCERNS

One of the main areas where we have seen a significant expansion with regard to leave & absence laws is under the ADA. If you read the ADA – it does not say a thing about leaves of absence. In fact, a leave of absence appears to be contrary to the intent of the ADA, which is designed to get disabled employees to work – to give them employment opportunities, not to get them off work.

Where leaves of absence are mentioned is in the EEOC regulations which say that “reasonable accommodation could include permitting the use of accrued paid leave or providing additional unpaid leave for necessary treatment.” The rationale is that employees may need a leave of absence for treatment, therapy or training related to a disability and that by providing a leave of absence you are enabling a disabled employee to continue working in the long run. Historically, this rationale received mixed reaction in the courts because some courts viewed requested accommodation in terms of employee leaves and absenteeism to be incompatible with attendance requirements. What courts have grappled with is the fact that the ADA protects only qualified individuals with disabilities and if you cannot come to work, and if you cannot meet the company’s attendance standards, how can you be qualified for the job? When Congress passed the Americans with Disabilities Act Amendments Act in 2008, it attempted, among many other things, to clear up this potential confusion by encouraging employers to “skip” the “qualified individual with a disability” analysis and, instead, focus on the accommodation aspect under the ADA.

There have been some court decisions holding that an essential element of any job is the ability to appear for work and that regular and predictable attendance is presumed to be an essential job requirement. If an employee can’t have regular and predictable attendance then they are presumed not to be a qualified for a job. Many employers have taken comfort in these decisions and have utilized them to their advantage. However, in recent years, many court decisions have called into question whether attendance is an “essential function” of the position. This trend began just over a decade ago. For example, in CEHRS v. Northeast Ohio Alzheimer’s Research Center, the Sixth Circuit Court of Appeals held:

no longer will a presumption exist that uninterrupted attendance is an essential job requirement. [Instead employers are going to] have to prove that attendance is an essential
requirement of a particular job. [Further,] a medical leave of absence can constitute a reasonable accommodation under appropriate circumstances and that requests for unpaid leave should be analyzed no differently from any other requests for accommodation under the ADA.

In the CEHRS case, the Sixth Circuit agreed with a decision out of a District Court in California, which stated that "A request for an unpaid leave of indefinite duration or a request for a very lengthy period such as one year could possibly constitute a reasonable accommodation that an employer would have to provide." What the sixth circuit really said is that: no longer can an employer have a per se rule that extended leaves are unreasonable or presume that employees have to meet attendance standards to be considered qualified for a job.

The practical effect of this is that employers are going to have to:

1. Look at a particular job and determine the importance of regular attendance to that position, and then consider requests for extended leave and absences like you would any other requests for reasonable accommodation, and

2. Employers may have to make adjustments in their leave of absence and attendance policies and allow more time off than the policy permits as a reasonable accommodation to an employee with a disability.

In light of this and other more recent decisions, there are several things employers should do to put themselves in the best position possible to show attendance is an essential requirement of a job and that allowing extended or sporadic absences is not a reasonable accommodation.

1. Have a written attendance policy that stresses the importance of regular and predictable attendance.

2. Analyze jobs to identify the jobs where regular attendance is critical. For example, does an employee's absence prevent necessary work from being done or does the employee have a job that can tolerate flexible scheduling and off-site work at home.

3. If attendance or the ability to work a certain number of hours a week is critical to a job, then put it in the job description as an essential element of the job.

In a recent case in St. Louis, Missouri involving a manager of a restaurant, the employer listed in its written job description that one of the essential functions of that position was the ability to work up to 10 hours or longer per day up to 6 days a week. The particular manager developed chronic fatigue syndrome which prohibited him from working 10 hours a day, so he asked the company to allow him to work a reduced work schedule of 4 hours a day for a period of time until he got better. The company said "no – we can't do that – we can't accommodate a 4-hour a day schedule in your position of manager.

Now, note one crucial fact here – he had used up all of his FMLA leave so the FMLA was not an issue in this case. In this respect, for the 12 weeks that the manager was on FMLA leave the company had been covering his shifts by pulling in other managers to work double shifts, and they would have had to continue to do this if he came back on a reduced work schedule. The
company said, “enough, we can’t continue to do this. It’s creating too much hardship” so they offered him a position as a server at the server’s salary, which could accommodate his reduced hours, and he quit and filed an ADA charge. Ultimately, the employer argued not only the undue hardship argument, but also that he was not qualified for a manager position because either with or without reasonable accommodation there was no way he could perform one of the essential functions of this job, which was to work the 10 hours a day required of this position. The fact that this was written in the job description as an essential function of this position helped us in this case.

In light of recent court decisions, it is more important than ever for employers to show that attendance and the ability to work a certain schedule of hours is essential for a particular job, and the impact that results to business operations if the employee can’t meet these requirements. Remember the courts are not saying that you are required to grant additional leave beyond your regular leave policies or to tolerate sporadic absenteeism. Rather, they are saying employers cannot just automatically presume that a person is unqualified or that additional leave will create an undue hardship. Therefore, employers are wise to engage in a fact-specific, individualized analysis in each situation in order to determine whether a leave of absence is a reasonable accommodation under a particular set of circumstances.

In considering whether there is undue hardship the EEOC says that an employer can take into account the impact that an employee’s 12 weeks of FMLA absence has had on company operations in deciding whether to grant additional leave. In the St. Louis case discussed above, that is exactly what the company did. They said, “we’ve accommodated you for 12 weeks by covering your duties but we can’t continue to do this.” If an employee has been off work for 12 weeks and then produces a doctor’s note saying, “employee x can return to full duty in 2 more weeks,” the employer is going to be hard pressed to justify why it cannot allow the employee 2 more weeks of leave as a reasonable accommodation.

The more likely scenario, however, is that an employer gets a doctor’s note saying “employee x is not able to return to work at this time, but will be evaluated in 2 more weeks.” And 2 more weeks rolls around and you get another similar indefinite note from the doctor or you get a note that says “the employee can return by x date” and that date keeps getting extended by the doctor. So, what is an employer to do? The EEOC says that if the employer cannot hold the employee’s job open any longer, then it must look around and see if it has any vacant equivalent position, or if not, then a vacant position at a lower level in which it can reassign the employee so he can continue to stay out on leave, and if there is no equivalent or lower level position, – then continued accommodation is not required.

From a practical standpoint, however, most companies simply do not have an inventory of vacant positions to assign employees. Normally, if there is a need for a position, there is a need for an employee in that job working. Therefore, a best practice in a situation like this is to first send the employee a letter that puts him on notice that due to business necessity the company cannot hold his job past x date. Then, if the employee is still not able to come back to work by the designated date, send him a letter that says: Due to business necessity your position has been filled and we have no other vacant position, which would allow you to continue on leave.

If the employee repeatedly produced doctor’s notes that keep extending the date to return to work, the employer might refer to this by saying: We are unable to rely on your doctor’s current projected return to work date due to the series of projected return to work dates
that have come and gone in the past. It is also a good idea to include some language in the letter that keeps open the prospect that the employee may reapply in the future if and when they recover from the condition that led to their inability to work. The employer might include, for example, a sentence that says: If in the future, you are able to return to work you may apply for any available positions for which you are qualified at that time. This language adds an element of compassion and fairness and shows that you as the employer are not trying to completely get rid of this employee. Compassion and fairness on the part of companies go a long way in jury trials.

There was a recent national survey conducted on how juries think. More than 75% of the people questioned said that as jurors, they would do what they believe is right – regardless of what a judge says that the law requires. And, what a juror believes is “right” typically boils down to what the person believes is fair. So, anything that casts an employer in the light of having behaved in a fair and compassionate manner in its treatment of an employee will go a long way toward helping the company avoid litigation in the first place or, if litigation ensues, then prevailing in that litigation.

Unfortunately, too often employers are afraid to terminate employees who are on a leave of absence, so they leave them out there in Neverland.

- They never communicate with them;
- They never hear from them;
- They never follow up with them;
- They never get a status report from them.

And then, all of a sudden, the company wakes up and realizes an employee has been on a 1-year leave of absence, or one day the employee calls and says, “I’m ready to come back to work now.” Under those circumstances, the employer usually and frantically calls its labor and employment counsel and asks “what can we do? We don’t want him back.”

Some companies utilize a leave of absence policy where if you have been on a leave for a specified period of time, regardless of the reason, and you are unable to return to work you are terminated by reason of the passage of time. The ADA and the ADAAA throw wrinkles into these automatic termination policies and employers must build in some flexibility for ADA purposes to address those situations where some additional time may be required as a reasonable accommodation. So, an employer’s policy might read: Normally, an employee who is unable to return to work after 6 months, regardless of the reason, is terminated. Exceptions may be made as required by law. Then the employer must look at each such situation on a case-by-case basis considering: 1) whether an ADA disability is involved; 2) how imminent is the date of return; and 3) what further accommodations to cover the employee’s duties will be required and will this create undue hardship. Methods that may be tolerable in the short-term may prove onerous and create undue burden over the long haul.

III. THE INTERSECTION OF THE ADA AND FMLA

One of the most important ways an employer can enforce its attendance policies and control absenteeism is by understanding what the ADA and FMLA require and don’t require, who’s covered and not covered, and how the 2 statutes interrelate. Unlike the FMLA, which requires a covered employer to provide an eligible employee to take a leave of absence, the ADA has no service and hours requirement. Employees are subject to the ADA from the first day employment and even before employment as an applicant. But unlike the FMLA, the ADA does
not create an entitlement to time off simply because one has a disability. You may be able to provide an effective accommodation that would allow the employee to remain on the job in lieu of taking time off, and if so, then you can deny the taking of leave for ADA purposes.

That’s different from the FMLA – because if an employee is eligible for FMLA leave and meets the requirements for an FMLA covered leave, then the employee is entitled to that leave for up to the 12 weeks, and an employer cannot force an employee to remain on the job by providing accommodation. The employee is entitled to the time off. By the same token, if an employee is eligible for FMLA leave and the absence qualifies as FMLA covered, then an employer can count that absence against the 12-week entitlement regardless of whether or not the employee wants that time counted as FMLA. Even if the employee says “no.” I’m not applying for FMLA, I don’t want it counted,” and some employees will say that, if leave qualifies then you can count it, provided you notify the employee that the time is being counted as FMLA leave.

Employers are wise to count any FMLA time it can against the 12 weeks because employers want to get that employee to use up that FMLA time. Burn it up – get it out of the picture. Because once that 12 weeks is used for the 12-month period that’s it – the employee loses any right under the FMLA to further leave entitlement or to job protection under the FMLA. However, as discussed repeatedly herein, employers may still have to consider the ADA and the issue of reasonable accommodation, but the Employer will no longer have to worry about job preservation under the FMLA – that statute drops out of the picture.

Employers will want to run all leave concurrently. Don’t allow employees to tack leave under one statute or policy onto leave under another. For example, if an employee is off work due to a worker’s compensation injury, which also qualifies as an FMLA serious health condition, and the employee is eligible for FMLA leave, then run both leaves concurrently. To better control attendance, employers should also require employees to first substitute or exhaust any available paid leave for unpaid FMLA leave, so that you don’t have the situation of an employee being off 12 weeks and then taking 3 more weeks of vacation. Note, though, the substitution has to be for unpaid FMLA leave. So, if an employee is on worker’s comp leave that is also being counted as FMLA leave, then for the period the employee is receiving workers’ comp benefits, an employer cannot require the employee to substitute paid vacation or any other paid leave during the absence.

When it comes to attendance issues under the FMLA, the type of leave or absences that you are going to have the most problems is not the foreseeable continuous leave where employees give the employer the 30-day notice, but it is the sporadic, short absences due to a serious health condition. And the ultimate question becomes – is this a serious health condition within the meaning of the statute? A serious health condition is not the same thing as a disability under the ADA. Congress couldn’t make this easy. You have different definitions and standards for each statute. By definition, a “serious health condition” under the FMLA is one that requires continuing treatment or inpatient care. In contrast, the ADA defines a “disability” as a physical or mental impairment that substantially limits one or more major life activities.

Don’t just assume that both statutes automatically apply in a given situation. For example, the FMLA considers pregnancy and a routine broken leg or arm to be serious health conditions, but these may not be disabilities under the ADA. Your serious health conditions are going to cover temporary medical conditions requiring doctor’s care, which may not be ADA disabilities if there are no complications or no long-term impact to substantially limit a major life activity.
Can you think of any “disability” under the ADA that would never be a serious health condition? There is one we can think of – a perceived disability. Don’t forget the ADA definition of disability includes persons who are perceived or regarded as being disabled when, in fact, they are not. The FMLA, however, does not recognize perceived serious health conditions. You have to actually have the condition.

What makes it difficult in determining if you have a serious health condition is that with some conditions a person must be incapacitated for more than 3 consecutive days and with other conditions you don’t have to be. For example, pregnancy and chronic conditions requiring treatment such as epilepsy, asthma or diabetes are not subject to the 3-day rule. An employee may be unable to report to work one day because of severe morning sickness or because of an epileptic seizure or asthmatic attack and that counts as an FMLA covered absence even though it’s only 1 day.

Furthermore, the employee does not even have to go to the doctor on that one day to receive treatment. As long as they are under the care of a doctor for the condition, they don’t have to actually see the doctor on the day of absence to have it count as FMLA.

So how does an employer control this? The employer has a right to adequate **medical documentation** to support a FMLA leave. Likewise, when an employee requests reasonable accommodation for a disability that is not obvious, an employer is entitled to adequate medical documentation to support the need for the accommodation. Don’t let the employee get away with providing only a vague doctor’s note. Employers should insist on adequate documentation to establish a disability under the ADA, the limitations that are imposed, and the accommodation that is being requested.

Likewise, require a completed medical certification that the employee has a serious health condition. Don’t accept incomplete forms from a doctor. If the employer doubts the validity of the medical certification provided by the employee, then the employer should require a second medical opinion, at company expense, and a third if necessary. Pending receipt of the second or third medical opinion, the employee is provisionally entitled to the benefits of FMLA, but if the certifications do not ultimately establish the employee’s entitlement to FMLA leave, then the preliminary designation as FMLA leave may be withdrawn, with notice to the employee. Under these circumstances, the employer should send a letter to the employee stating:

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Based on initial information we are preliminarily designating your absence as FMLA leave subject to receipt of proper medical documentation. In the event you do not provide the proper medical certification, your absence will not qualify as FMLA. Enclosed is a medical certification form which you should have your doctor complete. Please return the completed form to us by _____ (allow at least 15 calendar days).
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Employers also have the right to periodic recertifications under the FMLA, and employers should request such recertifications. These are tools that will help employers in managing employee attendance and absenteeism.

In controlling absences and enforcing attendance policies, it is important to know what the FMLA applies to and what it doesn’t cover because if it is FMLA covered, then an employer cannot count the absence in any way against the employee either for disciplinary purposes or under a no-fault attendance policy. If an absence is not covered under the FMLA, then you can consider it as an unexcused absence.
So, let’s consider 10 “what ifs?”

1. What if employee “A” calls the company and says I’ve got to take off half a day to take my child to the doctor for her annual check-up. Is that FMLA leave? No. Why? Because routine medical, dental, and eye examinations don’t count as FMLA leave.

2. What if the employee calls and says “I have to take off for a prenatal check-up? FMLA? Yes. Pregnancy is a serious health condition and Department of Labor says FMLA applies to prenatal examinations.

   Suppose the employee has the baby, returns to work and then asks to take off intermittently to take the baby for check-ups. No. Not unless the baby has a serious health condition.

Intermittent leave and leave on a reduced work schedule is only available where it is medically necessary due to a serious health condition. It is not available to an employee who has a baby, returns to work and then decides she’d like to work only half time in order to spend more time with the baby. There has to be medical necessity. The employer is entitled to certification from the health care provider that the intermittent or reduced leave is medically necessary.

When it comes to intermittent leave or reduced schedule leave employees who are taking foreseeable leave based on planned medical treatment are expected to consult with the employer to try to work out a schedule that minimizes the disruption to the employer’s business.

Another thing that may help to cushion the impact to employers is that the employer has the right to transfer an employee to an alternative position that can better accommodate the leave for leave. An alternative position has to have equivalent pay and benefits – but not equivalent duties.

3. What if an employee calls and says, “I need to take off half a day to make arrangements to get my grandmother who has Alzheimer’s into a nursing home? Is that FMLA leave? Alzheimer’s is a serious health condition isn’t it? Yes. She’s making arrangements for the medical care, which counts, but grandparents aren’t included under the FMLA as one of the family members. Can you think of a situation where this would be covered? If the grandmother raised the employee as a child and stood in the place of a parent then it would be an FMLA covered absence, because the FMLA applies not only to biological parents but also to persons who stood in the place of a parent.

4. What if it’s a mother-in-law with Alzheimer’s whom an employee needs time off to care for? No. In-laws aren’t included in the definition of “parent.”

5. What if an employee wants to take time off because his “significant other” or domestic partner has to have chemotherapy treatment? No – have to be married. But it includes common law marriages if recognized by the state.

6. What if an employee is not married but wants to take time off because his girlfriend is having a baby? It depends upon if it’s his baby or not. How do you know? Ask for the birth certificate to see who the father is. Under the FMLA an employer is entitled to documentation to establish family relationships.
7. What if an employee wants to take leave because her daughter is having a baby? Pregnancy is a serious health condition — isn’t it? It depends on the age of the daughter and whether she is disabled under the ADA. The FMLA defines a “son or daughter” as “one who is under 18 years of age or age 18 and older and incapable of self-care because of a mental or physical disability.” Even though the daughter has a serious health condition, she still has to meet the FMLA definition of “daughter.”

8. What if an employee wants time off to obtain custody of his biological son? No. FMLA applies only if it’s a proceeding to obtain foster care or adoption. That’s not the same thing as obtaining custody of one’s own biological child.

9. What if an employee’s father dies of a serious health condition and the employee asks for time off to attend to the father’s estate & probate matters? No. The Department of Labor has said once the person dies, any leave after that date is not FMLA.

10. What if an employee asks for time off to take her husband who is an alcoholic for treatment? Is that FMLA covered? Yes. Treatment for substance abuse is considered a serious health condition under the FMLA. But, what if the employee has used up all of her FMLA leave and wants the time off? Do you have to let her off? (no)

Isn’t alcoholism an ADA disability? (yes) what about reasonable accommodation? No. It doesn’t apply here. The duty of reasonable accommodation only applies to employees with disabilities. Here it is the spouse who had the disability and not the employee. Therefore, there is no legal duty to modify the company’s policy to allow her to take her husband for treatment if she has used up all of her FMLA leave. If, however, it was the employee who had the alcoholism and had to go for treatment, the issue of reasonable accommodation would arise.

In this situation, does the employee have any protection under the ADA? Yes. The employee is protected under the ADA because of her association with or relationship with a person with a disability. The ADA prohibits discrimination against a person based upon their association with a person with an ADA disability does this mean that the employer cannot count her absences as unexcused under its attendance policy? No. The employer can count the absences as unexcused. As long as the employer is consistent in its enforcement of its policy and counts absences for employees who are not protected under the ADA.

IV. CONCLUSION

The ADA and FMLA clearly make it more difficult for employers to implement strict attendance control policies. However, employers have certain rights and they should enforce these rights and make sure that employees provide the proper notice and documentation that is required. Also, by knowing the boundaries of the ADA and FMLA, employers can better ensure that employees receive no more leave than that required by law.
Keep ‘Em Coming! Reducing Absenteeism Through Effective Strategies

Presenters
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Reasons Employees Call in “Sick”

- Personal Needs
- Family Issues
- Personal Illness
- Stress
- Entitlement Mentality

CCH 2007 Survey
Why do employees steal leave time?

“A little cheating is everywhere. People generally don’t grab all they can – but only as much as they can psychologically.”

Dan Ariely, Professor of Psychology and Behavioral Economics
Duke University
How Do People Convince Themselves That Cheating Is Okay?

**Abstraction**

Psychological barriers stopping employees from having to directly connect their reward for cheating and their cheating

**Social Contagion**

The phenomenon that people tend to cheat more when they associate with a group that they see cheating

The Social Contagion Coupled with Lax Rules

- Cheaters
- Salts of the Earth
- Risk Weighers
The Social Contagion Coupled with Lax Rules

Human Reaction to Rules

- These thrive
- These cheat
- These leave

Cheaters  Salts of the Earth  Risk Weighers

One More Comment about Risk Weighers
Striking the Balance

Rules designed to give work-life balance
Rules designed to comply with laws

The Company’s expectation of regular, predictable, full, and prompt attendance

The Social Contagion

Our Goal: To have a productive workforce

- Fire the Cheaters
- Discourage the Risk Weighers
- Add to the Salts of the Earth
Leave abuse is theft/stealing/cheating
FMLA Abuse Hurts Everyone

The Company is committed to following the FMLA and allowing leave as required by any applicable law. It is there for those who use it for its intended purpose.

But those who abuse the FMLA or other forms of available leave and do not use it for its intended purpose harm the company and co-workers. It is basically stealing. It is a terminable offense!

If you know someone is abusing the FMLA or leave time – REPORT IT!

Call - _________________ to report suspected or known abuse. Reports will be treated anonymously.

The Morality Anchor

INTEGRITY STATEMENT

I, ______________, certify and promise that I will use the requested leave for its intended and stated purpose, and that if my reason or need for leave ends prior to my estimated return to work date, I will notify the company immediately and make arrangements to return to work. I understand providing false information to the company about my reason for leave is a terminable offense.

While on the requested leave, I can be reached at the following number: ______________.

If you need to send me correspondence in connection with my leave, I can physically receive mail during this leave at the following address:

_______________________________
Procedures

Advance notice of when taking leave

- Strengthen call-out policy and discipline for failure to follow
- Push for better notice and count absences if we receive late notice
- Look for patterns

Hyper-accurate information about what their life looks like when on leave

- Update job descriptions to get more information
- Push back on certifications to make sure we are getting what we are entitled to receive
- Use the ADA interactive process to your advantage

Call Out Policies

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<tr>
<th>Who</th>
<th>Employee should call</th>
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<td>No mothers please</td>
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<th>What</th>
<th>Reason for absence</th>
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<td></td>
<td>Expected length</td>
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<th>When</th>
<th>As soon as possible and practicable</th>
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practica-ble: able to be done or put into practice successfully

| Where | Employee must report to supervisor directly |

<table>
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<tr>
<th>How</th>
<th>Verbal</th>
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<td></td>
<td>No text messages</td>
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Job Descriptions

- Regular attendance is a necessary and essential function of the position
- Allows employer to describe and defend essential functions of the job
- Make sure they are accurate
- Update regularly and as needed

Interrogation

*interrogate*: to question formally and systematically

And when did you know that?

Just now... – Is this for incapacity or treatment?

1) Any early warning signs?
2) Incapacitated just now?
3) What essential functions can’t perform?
4) How planning to get home?
5) Any way to get better notice?

If sooner than given

If treatment – remind of obligation to schedule during off hours or when convenient. Ask if did that. Ask how could manage to only just now learn of treatment.

Instruct the employee that their obligation is to provide us notice ASAP
Appropriate Questions for Persons on Intermittent Leave

- Are you sure you need to take this leave?
  - For what?
  - Is this already approved?
- Is it medically necessary that you take the leave?
- What functions can you not perform?
- Is there any way you would be able to continue working?
- How are you going to get yourself home if you are incapacitated?
- If you can drive, how can you not work?

Identify Patterns
Improved Review of FMLA Forms

- The MOST important question on the certification form is
  - What essential functions can the employee not perform?
- Frequency and duration issues
- Pushing back on medical certifications
- Demanding recertification if an employee exceeds the scope

The Dual Obligation

If you want FMLA, do this

If you want any other type of absence, do this
Using the ADA as Your Friend

Accommodation within Job

Consider Company Leave and FMLA

Grant ADA Leave if Effective

Consider for Open Positions

Termination
Accountability

Consider Lawful Reasons for Termination

- Failure to provide certification
- Reduction in force
- Good faith belief of fraud or abuse
- Violation of policies while on leave
- Performance issues discovered during leave
- Misconduct discovered during leave
Keep ‘Em Coming! Reducing Absenteeism Through Effective Strategies

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