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# 2026 Employment & Labor Relations Seminar

DENVER, CO



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2026
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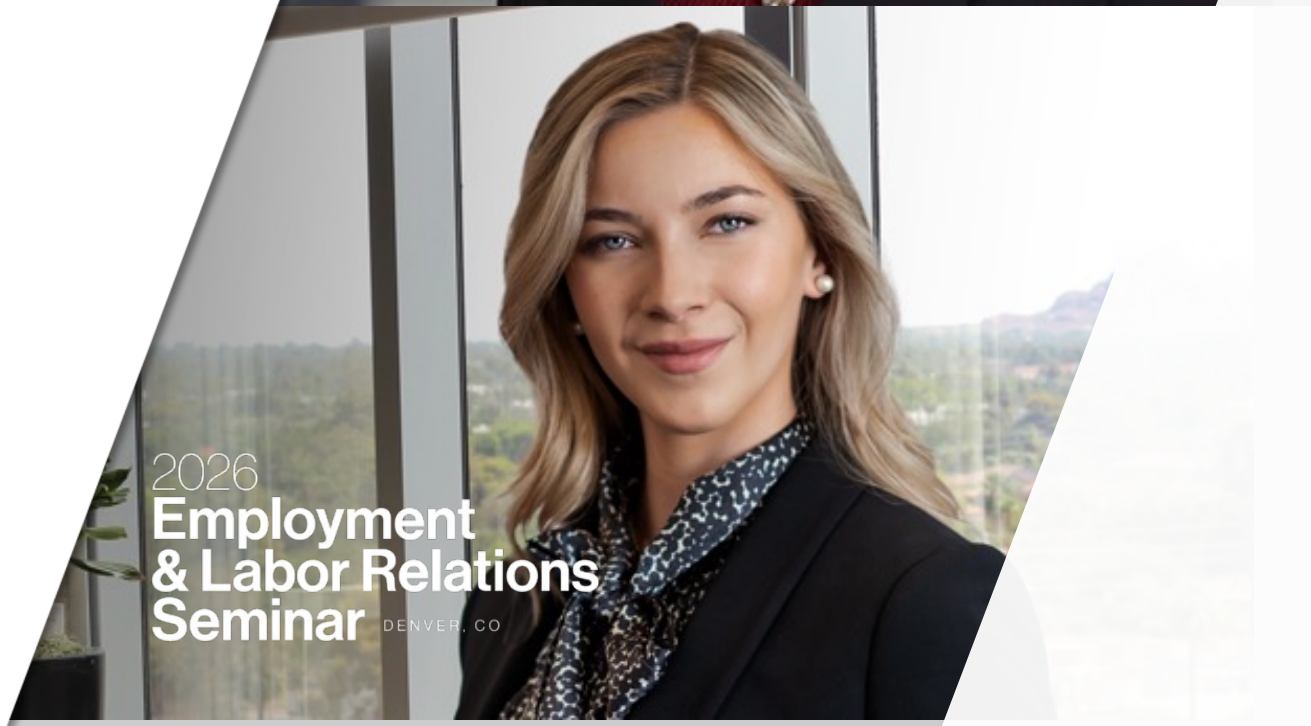
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# The Next Chapter in Colorado Employment Law


**Annie Sturges**
Associate

**Emily England**
Associate



# Previously Under Colorado's Family and Medical Leave Insurance Act ("FAMLI")

- Under FAMLI, an employee may take up to **twelve weeks** of paid FAMLI leave for:
  - The birth, adoption or placement through foster care of the employee's child, including caring for the new child during the first year after the birth, adoption, or placement;
  - To care for a family member with a serious health condition;
  - The employee's serious health condition;
  - Qualifying military exigency leave (based on a need arising out of an individual's family member's active-duty service or notice of an impending call or order to active duty in the armed forces); and
  - Safe leave (time off to attend to their needs if they or a family member have experienced domestic violence, stalking, abuse, sexual assault, or other similar situations).
- Employees may take up to an additional **four weeks** of paid FAMLI leave for a serious health condition related to their pregnancy or childbirth complications.

# 2026 Updates: Colorado's Family and Medical Leave Insurance Act ("FAMLI")

**As of January 1, 2026…**

- Neonatal Care Leave: Up to an additional **12 weeks** of paid FAMLI leave while child is receiving NICU care or higher-level care.
  - Could an employee take 28 weeks of FAMLI leave for one pregnancy?
- Premiums will be adjusted from 0.9% of wages per employee to **0.88%**.
- Employers with 10 or more employees will be responsible for the full premium, which may be split with employees by deducting half of the premium from wages.
- Employers with 9 or fewer employees will be responsible for paying half the premium, which may be deducted from employee wages

# Colorado's Healthy Families and Workplaces Act (HFWA)

**As of February 1, 2026…**

- New Wage Protection Rule adopted
  - Employees shall be paid for HFWA leave the same wages that the employee would have earned if the employee had worked
    - Excluding bonuses and overtime premiums
  - The rule provides examples to help calculate the pay rate in a variety of situations
    - Example: employees paid wages and commissions vs. entirely on commissions

# Individual Identification Document Protections

## As of June 3, 2026…

- Per House Bill 26-1283 (C.R.S. § 8-2-124.5), Employers of Colorado workers cannot demand, confiscate, or retain an applicant's or employee's government issued identification, with certain **exceptions.**
  - Be aware of the 10-hour temporary retention limit
- Notice:
  - Written Notice and Signed Acknowledgement
  - English and individual's primary language
  - Recordkeeping
- Criminal Penalties for wrongfully demanding, confiscating, or retaining an ID
- Employees can file a civil action to order the ID be returned and damages
- Legislative Concern? Prevent employers from holding the IDs of applicants, including immigrants and migrant workers, to intimidate, harass or coerce them

# Colorado Corporations and Associations Act Amended for State-level EEO-1 Data Reporting

**As of July 1, 2027…**

- Following Equal Employment Opportunity Commission's proposal to end EEO-1 data reporting, Colorado will require state-level reporting
- Employer: Private Colorado employers with 100 or more employees
- Requirement: file workforce demographic data related to race, ethnicity, gender, and job categories (in the same format Federal EEO-1 reports existed in on March 1, 2026)
- File with existing CCAA periodic reporting to the Colorado Secretary of State

- **Key Open Questions:**

- **Will employers be required to file EEO-1 data for all employees or just Colorado workers?**
- **Will the reports be confidential or public records?**

# Paid Voting Leave

**Previously…**

- Voting leave was required for an applicable employee only on the day of the election.
- However, leave could be denied if an applicable employee had at least 3 consecutive hours during nonworking time while the polls are open.

**As of June 1, 2026…**

- Employers must allow employees who are registered voters to take up to two hours of paid leave, one time, on any day that voter service and polling centers are open during an election.
- The 3 consecutive hours exception remains
- Advanced notice from employees can still be required

# A few more for good measure…

## Independent Contractor Classification

- Increased penalty risk for willful violations
- $5K per misclassified worker
- Potential for up to $50K for repeat/uncorrected violations

## Counties with a higher minimum wage than Colorado:

- Denver
- Edgewater
- Boulder (incorporated and unincorporated)

Different minimum wage for standard wage vs. tipped cash wage (tip credit)

## 2025 Reminder: Employer Biometric Data Collection

**Companies must:**

- Obtain Consent Before Collecting Biometric Identifiers from Employees
  - Consent can only be a condition of employment in limited circumstances
- Create a Written Policy

# What's New in Colorado Construction?

## Workers' Compensation Coverage Confirmation

- Effective May 29, 2026
- Construction projects over $1 million
- When applying for the building/construction permit, employer must submit a signed statement before work begins.
- Confirm everyone working under the permit will have valid workers' compensation insurance for the duration of the permit.

## Extreme Temperature Protections

- Beginning 2027
- CDLE will oversee state agencies in collecting data
- Develop a model temperature-related injury and illness prevention plan (TRIIPP) by July 1, 2028
- No new requirements for employers now

## Prohibited: Wage Deductions for PPE

- Effective June 3, 2026
- PPE defined in new amendment
- Excludes ordinary clothing and footwear

# Federal Updates to Know

## Sweeping Minimum Wage Increases

- Colorado - $15.71**
- California - $17.40**
- New Jersey - $16.48**
- Rhode Island - $17.00**
- Washington - $17.73**

## Arbitration in Sexual Assault/Harassment Cases

- Invalidation of agreements requiring pre-dispute mandatory arbitration in sexual assault and harassment cases

## Slashed EEOC Position Statement Response Deadline

## EEOC Enforcement Priorities

- Scrutinizing diversity, equity, and inclusion initiatives
- Scrutinizing national original discrimination against U.S. workers
- Protections for single-sex spaces
- Single-sex spaces
- AI decision-making in the workplace

# Pregnant Workers' Fairness Act Overhaul (PWFA)

### Contrast with ADA/FMLA

- Documentation Not Required for All Accommodations
- Limited Documentation Requirements for Accommodation
- Removal of Essential Duties Permitted
- Leave of Absence Permitted under Certain Circumstances

### Clarifying Definition of "pregnancy, childbirth, and related conditions"

### Narrowing Scope of Covered Conditions

- Menstruation
- Infertility Treatments
- Menopause

### Rulemaking Timeline

- NPRM scheduled for November 2026
- Comment period to end in January 2027

### Increased Enforcement of Discrimination Claims

# Employer's Toolbox

- **Job Postings**
  - Salary Ranges
  - Benefits Information
  - Equal Posting Availability
  - Progression Requirements
- **FCRA Notice**
  - Use Disclaimer
  - Notice of Rights
- **Offer Letters**
  - Minimum Wage Updates
- **Employee Benefit Plans**
- **Employment Agreements**
  - HFWA Updates
  - FAMLI Policy Updates
  - PWFA Updates
  - Accommodation Policies
- **Identification Notice**
  - Statutory Language
- **Biometric Info Policy**
- **Biometric Info Notice**
- **Exemption Audits**
  - Exemptions
  - Salary Threshold
- **Arbitration Agreements**
  - Sexual Assault/Harassment Carveout
- **Non-Competition Agreements**
  - Salary Threshold
- **Non-Solicitation Agreements**
  - Salary Threshold
- **Employee Handbook**
- **Separation Agreements**
- **Severance Agreements**

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# *Ames* and Its Aftermath:
## What Employers Need to Know

**Roger Trim**
Partner / Denver



# *Ames* And Its Aftermath

- Factual overview of *Ames* Decision
  - Ms. Ames, a heterosexual woman, had been employed in Youth Services since 2004. In 2019, the Employer interviewed her for a new management position but hired a lesbian woman. The Employer demoted Ames from Program Director and hired a gay man to fill that role.
  - Ames sued under Title VII, claiming that she had been discriminated against in both instances because of her sexual orientation.



# Environment Surrounding *Ames*

## Executive Order and Federal Court Acceptance of "Majority Bias" Cases

- President Trump ended the "obsession" with DE&I programs by revoking Executive Order 11246 on February 12, 2025, in Executive Order 141173 for federal contractors and subcontractors and in the administration of federally assisted construction contractors
- EO 14173 also orders the DOL to cease promoting "diversity." Contractors must certify that the contractor does not operate any programs promoting DEI that "...violate any applicable Federal anti-discrimination laws."
- Resulting lawsuits against employers, public and private, who are making employment decisions based on their DE&I programs and "goals."
- *Dill v. IBM*, 2025 U.S. Dist. LEXIS 55953 (W.D. Mich. 2025) (denying motion to dismiss male Caucasian employees' race discrimination lawsuit alleging IBM had provided managers with diversity incentives and goals, including for "half of IBM's employees to be women, thirteen percent to be black, and a percentage in the mid-teens to be Hispanics [sic]." While diversity policies themselves are not illegal, the Court found the specific targets to be problematic.

# Environment Surrounding *Ames (Cont'd)*

- *Toney v. The Clorox Co*., 2025 U.S. App. LEXIS 9909 (9th Cir. 2025) (reversing summary judgment pertaining to male employee's termination). The Court found a reasonable jury could conclude that the Company's IGNITE Strategy, where the Company had a specific gender representation goal for management and sought to increase the number of female managers, along with the Company's inconsistent reasons, could create a discriminatory inference.
- *Bowen v. City and County of Denver*, 2025 U.S. Dist. LEXIS 70781 (D. Colo. 2025) (denying motion for judgment on the pleadings brought by white male deputy sheriff). The plaintiff had higher assessment scores than relevant female comparators. Additionally, the government was participating in the "30X30 Initiative" which sought to make 30% of police recruits female by 2030. The Court later denied summary judgment on the same claims in a March 26, 2026 Order.
  - Common thread of these cases is the insufficient documentation supporting employment with diversity programs containing specific targets
- The EEOC has entered the chat: Andrea Lucas, EEOC Chair, has vowed to target "Anti-American" discrimination in the workplace. Shortly after her appointment, Lucas stated that employers should be on "notice" if any "illegal preferences against American workers" are contributing to immigration problems. While Title VII has always included American identity within the definition of "national origin" the EEOC's comments announce a marked shift from the EEOC's typical national origin discrimination enforcement priorities.

# Back to *Ames*

- The Federal District Court of Ohio granted the Employer's Motion for Summary Judgment. The 6th Circuit Court of Appeals affirmed; both of whom followed the traditional *McDonnell Douglas* analysis, which relies on "circumstantial evidence". The District Court and Court of Appeals both concluded she failed because she failed to show **"background circumstances to support the suspicion that the defendant is that unusual employer who discriminates against the majority."** 78 F.4th 822, 825 (emphasis added).

# The Supreme Court's *Ames Rationale*

- "Congress left no room for courts to impose special requirements on majority-group plaintiffs alone. This Court's precedents reinforce that understanding of the statute, and make clear that the standard for proving disparate treatment under Title VII does not vary based on whether or not the plaintiff is a member of a majority group. *See, e.g., Griggs v. Duke Power Co*., 401 U. S. 424, 431 …." Unanimous decision, Justice Jackson delivered the opinion of the Court.
- *Ames* cannot be viewed in a vacuum and should be interpreted along with the 2024 *Muldrow v. City of St. Louis* decision, which lowered the bar for "adverse actions" that can support discrimination claims.
- Epilogue: Ames is not done. She recently sued the Ohio Department of Youth Services alleging retaliation and hostile work environment. She contends she suffered retaliation after the ruling and was confined to a single room at a new facility, given limited access, denied a promotion, and experienced isolation and jokes.

# Did *Ames* Change Anything?

- Yes, from a litigation risk profile, particularly when combined with *Muldrow*'s effect.
- Not necessarily from an advice and counseling perspective.
- What now?
  - Title VII is only half the picture
    - Consider potential Section 1981 claims, which have uncapped damages (the "nuclear verdict")
  - Impact on workplace, decisions, programs, and initiatives
    - Documentation for any hiring, promotion, disciplinary, or termination decision. Recall that the pre-*Ames* courts relied heavily on the lack of documentary evidence in their holdings.
    - Policies and procedures which could serve as the basis for an *Ames* claim
      - Hiring or promotion policies which give explicit preference to certain demographics
      - Internship or mentoring programs which target specific groups while excluding others.
      - Employee training that includes race or gender-based stereotyping
      - Affinity groups that exclude employees based on race, gender, etc.
      - Initiatives which have specific targets, goals, or quotas
      - Limits on workplace speech or expression (some states, such as Montana, have specific laws that address this issue).
      - AI with baked-in bias from workplace initiatives

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# The Death Knell of DE&I

**Raymond M. Deeny**
Partner / Taft - Colorado Springs



# The Death of DE&I

***EEOC Plans to administratively close all Pending Worker Charges Based Solely on Unintentional Discrimination Claims, Says Bloomberg Law.***

## 2025

- Bloomberg Law reported that the EEOC issued an internal memo that instructs EEOC staff to close all pending worker charges based solely on unintentional discrimination claims, with limited exceptions, and issue right to sue letters for those cases by October 31, 2025.
- It's the latest major enforcement shift for the civil rights agency based on executive orders from President Donald Trump

## 2026

- The Director of the Labor Department's Office of Federal Contract Compliance Programs (OFCCP), Catherine Eschbach,  told staff she will transition into the principal deputy general counsel of the EEOC.
- Eschbach was appointed to lead the OFCCP in March, overseeing the Trump administration's moves to gut its power and slash its staff, as part of its plan to ultimately eliminate the office entirely.

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# DE&I REPRISE

# Ames v. Ohio Dep't of Youth Services, 605 U.S. _____ (2025)

Example Case on Sexual Orientation Discrimination Allegations

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# DE&I REPRISE

***Ames v. Ohio Dep't of Youth Services*, 605 U.S. _____ (2025)**

## Sexual Orientation Discrimination Allegations

- Ms. Ames, a heterosexual woman, had been employed in Youth Services since 2004. In 2019, the Employer interviewed her for a new management position but hired a lesbian woman. The Employer also demoted Ames from Program Director and hired a gay man to fill that role.
- Ames sued under Title VII, claiming that she had been discriminated against in both instances because of her sexual orientation.

# DE&I REPRISE

***Ames v. Ohio Dep't of Youth Services*, 605 U.S. _____ (2025)**

## Summary Judgment Granted and Affirmed Under *McDonnell Douglas A*nalysis

- The Federal District Court of Ohio granted the Employer's Motion for Summary Judgment. The 6th Circuit Court of Appeals affirmed; both of whom followed the traditional *McDonnell Douglas* analysis, which relies on "circumstantial evidence". The District Court and Court of Appeals both concluded she failed because she failed to show **"background circumstances to support the <u>suspicion</u> that the defendant is that unusual employer who discriminates against the majority."** 78 F.4th 822, 825 (emphasis added).

# DE&I REPRISE

***Ames v. Ohio Dep't of Youth Services*, 605 U.S. _____ (2025)**

## The Results

- "Congress left no room for courts to impose special requirements on majority-group plaintiffs alone. This Court's precedents reinforce that understanding of the statute and make clear that the standard for proving disparate treatment under Title VII does not vary based on whether or not the plaintiff is a member of a majority group. *See, e.g., Griggs v. Duke Power Co*., 401 U. S. 424, 431 …." Unanimous decision, Justice Jackson delivered the opinion of the Court.
- The Circuit Courts have been split as to whether majority-group plaintiffs are subject to a different evidentiary burden than minority-group plaintiffs at the *McDonnell Douglas* first step. [The Circuit split includes the 8th Cir., the 7th Cir., the D.C. Cir. and the 10th Cir. – ***Notari v. Denver Water Dep't.*, 971 F.2d 585 (10th Cir. 1992).**

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# DE&I REPRISE

# The Changing Landscape of Circumstantial Evidence

Executive Order 141173, Executive Order 14398 and Federal Acquisition Regulation52.222.90

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# DE&I REPRISE

***The Background Circumstantial Evidence Ended With Executive Order 141173***

- President Trump ended the "obsession" with DE&I programs by revoking Executive Order 11246 on February 12, 2025, and issuing Execution Order 141173 for federal contractors and subcontractors.
- **EO 14173** also orders the DOL **to cease promoting "diversity"** and required contractors to certify that the contractor does not operate any programs promoting DEI that "...violate any applicable Federal anti-discrimination laws."
- On January 24, 2025, the Acting Secretary of Labor issued an order directing the OFCCP and all other DOL employees **"To immediately cease and desist all investigative and enforcement activity under the rescinded Executive Order 11246..."** and its regulations, closing all existing investigations.
- On August 24, 2026,  the U.S. Department of Labor formally dismantled the regulatory framework administered by the OFCCP behind the executive order ending decades of federal contractor affirmative action requirements.
- This rule is effective October 26, 2026.

# DE&I REPRISE

## *Executive Order 14398 and Federal Acquisition Regulation 52.222-90*

- EO 14398 was signed by President Trump on March 26, 2026, and directed federal agencies to insert an anti-DEI clause into government contracts and subcontracts.
- FAR 52.222-90 is the implementing contract clause that the FAR Council issued via government-wide class deviation to carry out EO 14398, **effective for new solicitations beginning April 24, 2026. FAR 52.222-90 also is being added to existing contracts through change orders**.
- FAR 52.222-90(b)(1) prohibits contractors from engaging in "any racially discriminatory DEI activities." FAR 52.222-90(a) defines "[r]acially discriminatory diversity, equity, and inclusion (DEI) activities" as "disparate treatment based on race or ethnicity in the recruitment, employment (e.g., hiring, promotions), contracting (*e.g.*, vendor agreements), program participation, or allocation or deployment of an entity's resources."

# DE&I REPRISE

## *Federal Acquisition Regulation 52.222-90 and the False Claims Act*

- FAR 52.222-90 has a direct tie to the False Claims Act. For instance, FAR 52.222-90(b)(6) states, “The Contractor recognizes that compliance with the requirements of this clause are material to the Government's payment decisions for purposes of 31 U.S.C. 3729(b)(4).” 31 U.S.C. 3729 is the core provision of the False Claims Act. Therefore, if a contractor makes a payment request to the federal government on a contract for which FAR 52.222-90 applies and the contractor is in violation of FAR 52.222-90, the contractor will likely commit a false claim with each payment request. The civil penalty for a false claim ranges from $14,308 to $28,619 per violation (as the statutory range of $5,000 to $10,000 has been adjusted for inflation). There also may be criminal punishment of up to 5 years per violation, as well as administrative penalties (such as suspension and debarment).

# DE&I REPRISE

## *The Anti-DEI Provision*

The contractor must certify that it did not operate any DEI program as of June 29, 206, that had a disparate treatment based on race of ethnicity.

**The Anti-DEI Provision states the following:**

> (a) The Contractor agrees that compliance in all respects with all applicable Federal ant-discrimination laws is material to the Government's payment decisions under this contract, as defined in 31 U.S.C. 3729(b)(4). Failure to comply with these laws may result in the withholding of payments, suspension of contract performance, or other remedies as deemed appropriate by the Government.(b) The Contractor further certifies that it does not operate any DEI programs that violate any applicable Federal anti-discrimination laws related to the performance of this contract.(c) The Contractor shall notify the Contracting Officer in writing within five (5) business days of discovering any noncompliance or potential noncompliance with this clause, including if it operates any DEI-related programs that may require review under applicable law.

# DE&I REPRISE

***The Question: What is disparate treatment?***

- The question then is what is "disparate treatment based on race or ethnicity"? The FAR Council has not provided any interpretative guidance. A preference in recruitment, employment, contracting, or program participation based on race or ethnicity would likely be disparate treatment. A harder question arises with neutral factors, such as "economically disadvantaged."

- In 2025, the Department of Justice ("DOJ") issued non-binding guidance as to how DEI may be unlawful. This non-binding guidance only applied to federal grants, but contractors should be aware of how the DOJ may view what is and what is not unlawful DEI. Relevant to DOJ stated that an employer cannot use "ostensibly neutral criteria that function as substitutes for explicit consideration of" a protected characteristic when such factors "correlate with, replicate, or are used as substitutes for protected characteristics" or the "intent [is] to advantage or disadvantage individuals based on protected characteristics." The DOJ states that "[c]riteria like socioeconomic status, first-generation status, or geographic diversity must not be used if selected to prioritize individuals based on racial, sex-based, or other protected characteristics."

# DE&I REPRISE

## *Example Case Study – Duty to Voluntary Disclose*

- FAR 52.203-13, Contractor Code of Business Ethics and Conduct, requires a contractor to timely disclose in writing to the agency's Office of Inspector General ("OIG"), with a copy to the contracting officer, whenever it has credible evidence that a principal, employee, agent, or subcontractor has committed a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations under Title 18 of the U.S. Code, or a violation of the civil False Claims Act, 31 U.S.C. §§ 3729–3733. The disclosure is required once the contractor has "credible evidence" — not proof beyond a reasonable doubt — that there has been a violation of Federal criminal law.

- In view of these enforcement actions Deloitte entered into a $21.5 million dollar settlement with the Department of Justice over a lawsuit brought by a whistleblower under the False Claims Act. Attorney General Todd Blanche issued a press release associated with the settlement that stated, "Government contractors cannot reward or penalize employees based on race or sex — and labeling the practice DEI does not make it lawful . . . The Justice Department will aggressively pursue government contractors that have used taxpayer dollars to fund unlawful discrimination."

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# DE&I REPRISE

## What Is A Contractor To Do?

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# DE&I REPRISE

## *So, What Is A Contractor To Do?*

- Don’t submit an invoice for any services you performed.
- Return any funds paid to the contractor.
- Discuss voluntarily disclosure.

# DE&I REPRISE

***Other options that you may consider:***

- Defend on the basis that you have a voluntary affirmative action plan that complies with Supreme Court Authority.
  - **United Steelworkers v. Weber**, 443 U.S. 193 (1979)
  - **Grutter v. Bollinger**, 539 U.S. 306 (2003)
  - **Gratz v. Bollinger**, 539 U.S. 244 (2003)
  - **Fischer v. Univ. Texas at Austin**, 579 U.S. 365 (2016)
- What data will you rely on with no EEO-1 reports or EO 11246?
- Sue the government for breach of contract?
  - **Natl. Assoc. of Diversity Officers in Higher Edu. v. Trump** (4th Cir. 2026)

# DE&I REPRISE

## *Natl. Assoc. of Diversity Officers in Higher Edu. v. Trump (4th Cir. 2026) 10/14/2026 Memorandum Opinion US District Judge Adam B. Abelson*

**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF MARYLAND**

NATIONAL ASSOCIATION OF DIVERSITY OFFICERS IN HIGHER EDUCATION, *et al.*,
*Plaintiffs*,
v.
DONALD J. TRUMP, *et al.*,
*Defendants.*

Case No. 26-cv-1532-ABA

**MEMORANDUM OPINION**

In January 2025, the President ordered federal agencies to include in "every contract or grant award" a term certifying that the grant recipient "does not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws." Exec. Order No. 14,173 § 3(b)(iv), 90 Fed. Reg. 8633 (Jan. 21, 2025). The Fourth Circuit held that the provision did not facially violate the First Amendment because it "requires only that plaintiffs certify compliance with federal antidiscrimination laws, which the First Amendment doesn't confer a right to violate." *Nat'l Ass'n of Diversity Officers in Higher Educ. v. Trump*, 167 F.4th 86, 103 (4th Cir. 2026) ("*NADOHE I*").

In March 2026, the President issued a narrower executive order, entitled "Addressing DEI Discrimination by Federal Contractors." Exec. Order No. 14,398, 91 Fed. Reg. 16,147 (Mar. 26, 2026) (hereinafter, the "Order" or the "Contractors Order"),

Plaintiffs are five organizations whose membership includes government contractors. They assert that the Contractors Order is unconstitutional on its face and seek a preliminary injunction against it as well as a stay of a memorandum by the Federal Acquisition Regulatory ("FAR") Council implementing it (the "FAR Memo"). But "existing federal law already demands" that federal contractors not engage in intentional discrimination, "and plaintiffs have not challenged existing law as viewpoint-discriminatory or as over or underinclusive." *NADOHE I*, 167 F.4th at 104. And Plaintiffs press a First Amendment overbreadth challenge, which requires Plaintiffs to establish that the Contractors Order is "unconstitutional in all of its applications" or "lacks any plainly legitimate sweep." *Id.* at 100 (quoting *Edgar v. Haines*, 2 F.4th 298, 310 (4th Cir. 2021)).

Because Plaintiffs have not made that showing, and have not shown a likelihood of success on their Fifth Amendment claim or irreparable harm warranting preliminary relief against the FAR Memo, their motion for a preliminary injunction and stay (ECF No. 28) will be denied.

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# The AI Revolution in HR:

## New Laws Impacting Recruiting, Hiring, and Employee Management

**Beau Braswell**
Senior Associate / Taft



# Program Objectives

- How AI is being deployed across the HR lifecycle
- Key employer-facing AI legal and regulatory requirements
- Practical compliance strategies and risk mitigation
- Emerging litigation trends and enforcement priorities
- Forecast what HR leaders should expect next as regulation evolves

# AI's Emerging Role in HR

- Rapid adoption of AI-enabled tools in HR functions
- Shift from administrative automation to decision support
- What do we mean by "AI" in HR?
  - Machine learning, predictive analytics, generative AI
  - Automated decision tools for screening, interviewing, performance
  - Assistive tools: resume summarization, chatbots, drafting
  - Monitoring and productivity analytics
- AI enhances efficiency but introduces heightened legal risk

# Key AI Applications in HR

- Intelligent search / sorting of resumes
- Automated interviewing
- Candidate scoring
- Behavioral/video/image analysis
- Timekeeping / biometrics
- Transcription/notetaking

# AI in Recruiting and Hiring



- Resume screening and ranking
- Candidate sourcing and matching
- Interview scheduling and chatbots
- Automated assessments and video interview analysis (including facial expression and voice analysis)



- Speed and scalability
- Reduced administrative burden
- Data-driven decision support



- Bias amplification
- Lack of transparency
- Disparate treatment and impact exposure
- Potential litigation / enforcement around notice / consent / others(?)

# AI Performance Management & Workforce Operations

**Common Uses Today**

- Performance reviews and productivity analytics
- Monitoring attendance, output, and engagement
- Promotion and succession planning insights
- Workforce planning and attrition prediction

**Legal Implications**

- Employee monitoring concerns
- Fairness and explainability
- Data accuracy and reliability

# AI and Data Privacy / Security

## Data

- Confidential information re: hiring strategy
- Sensitive personal data collection
- Third party data ingestion / sharing
- Reporting analytics / assessments

## Risks

- Breach: unauthorized access and exposure, data manipulation / poisoning
- Compliance failure

# AI Regulation in Employment: Key Statutes

- Employment Discrimination Statutes
  - Title VII, ADA, ADEA
  - EEOC guidance and enforcement priorities
  - And other employment laws: NLRA, FLSA
- State AI Statutes
  - CA, CO, IL, MD, NJ, NY
- Data Privacy Laws
  - BIPA, CCPA/CPRA, Data Broker Laws, similar laws
- Consumer Protection and Transparency Rules
  - FTC, FCRA

# State AI Statutes / Regulations

- New York City Automated Employment Decision Tools law
- Illinois Human Rights Act - Artificial Intelligence in Employment
- Illinois AI Video Interview Act
- California – Fair Employment and Housing Act
- CCPA/CPRA (and similar)
- New Jersey Law Against Discrimination
- Colorado's revised comprehensive AI law
- Other general AI laws

# State Data Privacy Statutes

- California Consumer Privacy Act, others (CCPA)
  - **Common HR touchpoints**: *AI search and sorting, reporting, collection of sensitive data, vendor contracts permitting secondary use constituting "sale" or "sharing"*
  - **Risk assessment requirement**: purpose, collection/processing, retention, document interactions, data subject volume, sharing, the logic and output of the ADMT, benefits/costs/mitigation/safeguards, decision to process, approver. **Certification of RA to be submitted under penalty of perjury by "member of executive management team" directly responsible and with knowledge**
- Illinois Biometric Information Privacy Act (BIPA)
  - Common HR touchpoints: timekeeping systems using fingerprints, hand or face geometry; access control using face geometry; voiceprints used for authentication or screening; possibly, sophisticated-enough behavioral monitoring
  - Requirements: written consent for collection; written retention and destruction policy; security; limits on disclosure/redisclosure

# Red Flag Scenarios

- Resume sorter eliminating groups disproportionately, or without human review
- Productivity monitoring tied to discipline without validated metrics
- Black-box hiring models with no explainability for adverse actions
- Rapid deployment of generative AI without privacy / compliance review
- Reporting on third party ingested data

# Best Practices for Responsible AI Use in HR

- Establish AI governance and oversight structures
- Conduct bias and impact assessments
- Maintain human review of decisions
- Document AI use cases and rationale
- Train HR teams on AI limitations
- Prepare and deploy notices as appropriate (e.g., ten day advance notice under NYC Local Law 144, plus “allow a candidate to request an alternative selection process or accommodation”)

# Working with AI Vendors

- Key Questions HR and Legal Should Ask:

  As implemented / used, what (AI) statutes or other legal considerations are in scope? What will, or won't, vendor do to help bridge the gap?

- Further diligence / contracting from there:
  - Training / testing?
    - Bias assessments? Risk assessment / DPIA?
    - On-prem / cloud? (Infosec?)
    - Data inputs?
    - Audit? Cooperation?
    - Contractual allocation of liability (negotiation)

# AI Compliance in Practice

- Regulators and Courts Expect:
  - Evidence of thoughtful implementation
  - Ongoing monitoring and reassessment
  - Ability to explain decisions to employees and regulators
  - Alignment with existing employment and privacy laws
  - In California: Potential certification of risk assessments under penalty of perjury by a relevant executive

# Anticipated Litigation Trends

- **The Plaintiff's Bar Playbook**
- Targeting employers using automated tools at scale
- Leveraging new AI-specific statutes
- Combining AI claims with traditional discrimination theories
- Seeking discovery into algorithms and training data
- Using privacy violations to reinforce employment claims
- Opportunistic demands priced to settle
- Weaponization of DSR process as cheap, pre-trial discovery

# HR Best Practices

- Implement an AI use policy
- Create AI inventory & risk-prioritized roadmap
  - Identify AI tool(s) in use
  - Prepare an internal guide explaining the AI tool(s)
- Require algorithmic impact assessments for new tools
- Provide advance notice of implementation
- Update vendor contracts for AI risks
- Train HR & IT teams on oversight responsibilities
- Conduct regular audits/bias testing for current systems
- Remediate if necessary

# Privacy & Data Protection Approaches

- Application/use reviewed by legal
- Formal assessments where required
- Limitation on data ingestion / sharing
- Specific controls as needed (biometrics, recordation)
- “No surprises” rule
- DSR issues / risks
- Data minimization & retention limits
- Clear notices / opt outs where required
- Anonymization/pseudonymization where possible
- Dev/production separation

# Policy & Employee Communication

- Clear AI use policy for HR and workforce-facing tools
- Candidate/employee disclosure and opt-out options where required
- Training for HR staff/managers on tool limitations and AI discrimination
- Channels for challenge/appeal of AI-driven decisions

# Key Takeaways



**AI is already shaping HR operations**



**Legal and compliance risks are real and growing**



**Responsible AI deployment is achievable with the right controls**



**Preparation today will mitigate tomorrow's risk**

Taft/

# Beyond the Hire:
## Privacy and Security During and After Employment

**Jordan Jennings**
Senior Associate / Taft



## Privacy

**How Data is Handled**

Collection, notice, consent, use, sharing, retention, deletion, and cross-border transfer of personal information.

## Security

**How Data is Protected**

Administrative, technical, and physical safeguards, incident readiness, vendor controls, and breach response.

## AI

**How Automated Data Tools are Governed**

Use of AI systems, automated decision making, training data, outputs, human oversight, contract terms, bias concerns, and emerging regulation.



# Privacy and Security Across the Employment Lifecycle

**Meet Alex**




**THROUGHOUT THE LIFECYCLE**

Transparency | Data minimization | Security | Individual rights | Vendor oversight

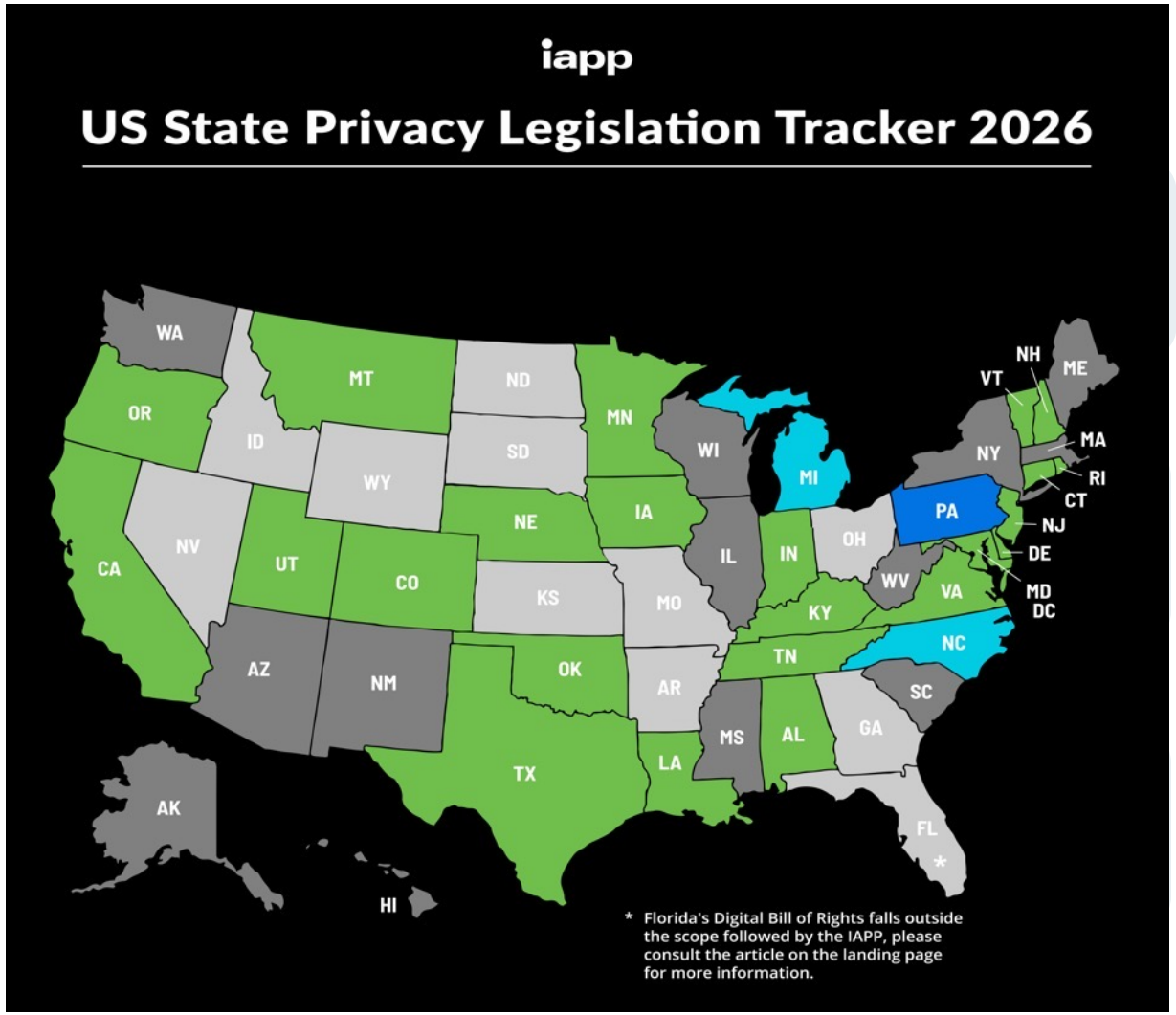
# Key Questions

**With respect to employee personal information, key questions to consider include:**

- **WHY collect it?**
- **WHO can access it?**
- **HOW LONG to keep it?**
- **WHAT IF it leaks?**



# Employee Privacy Legal Landscape




## FEDERAL LAW

### AMERICANS WITH DISABILITIES ACT (ADA)

Keep covered medical information in separate, confidential files; limit access and disclosures.

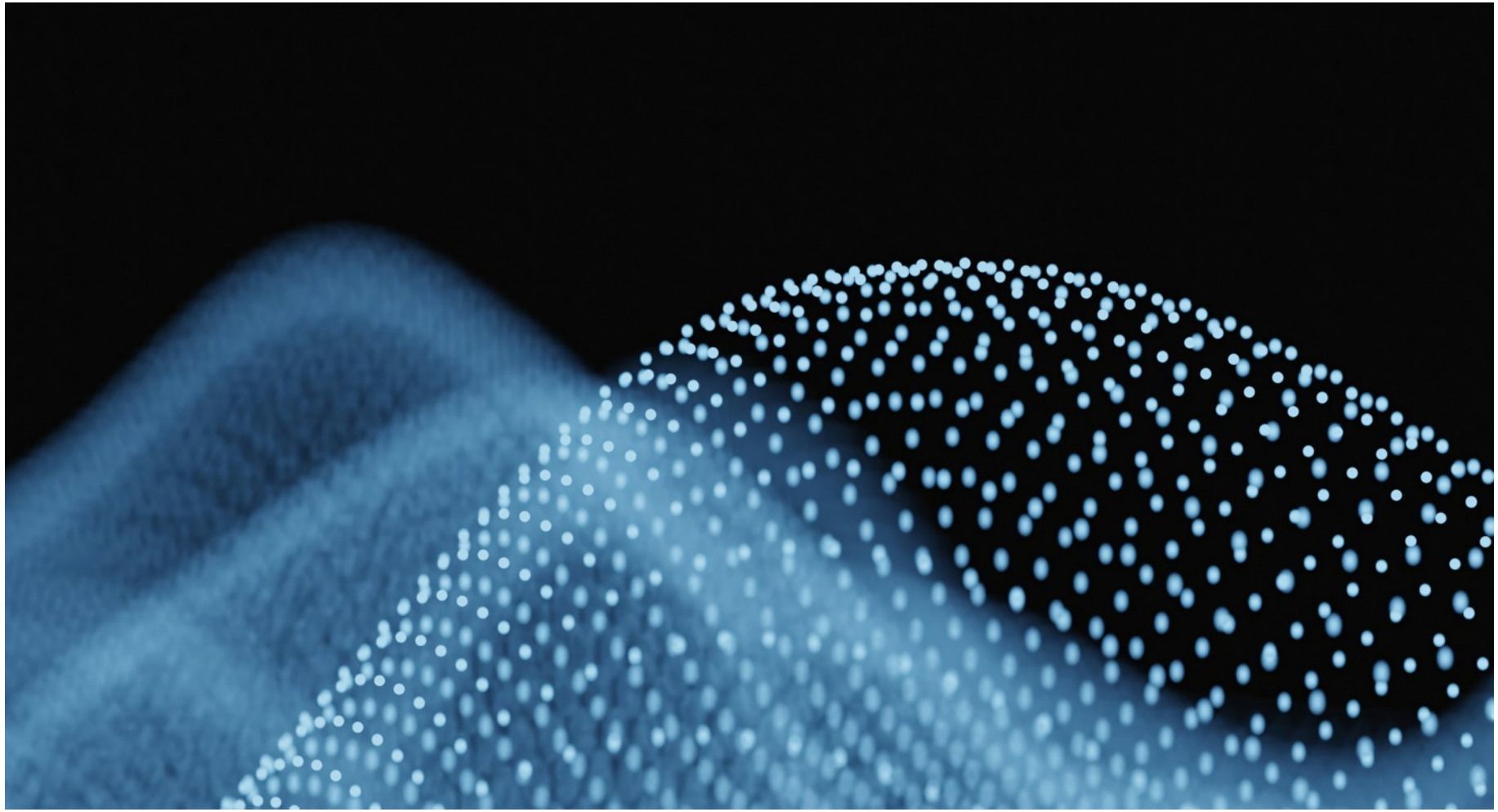
### HIPAA/GROUP HEALTH PLANS

Plan PHI ≠ ordinary employment records. Separate plan administration from employment uses.

### DOJ DATA SECURITY/28 CFR PART 202

Certain foreign-access transactions are prohibited or restricted. Screen HR vendors, access and exemptions.

# Understand Why You Are Collecting It



# Employees Should Not Have to Guess




Make the employee's view clear.

**01 What do we collect?**

Employee data + workplace monitoring

**02 How do we use it?**

Business purposes + AI's role in decisions

**03 What are the boundaries?**

Who can access it + employee responsibilities + how long we keep it

**Explain it before rollout. Update people when practices change.**

# Security + Incident Readiness

## Know Who to Contact

- Familiarize yourself with your internal incident response policies and confirm incident contacts and reporting channels.
- Train your team to report suspected incidents promptly.

## Recognize Sensitive Employee Data

- Colorado's Breach Notification Statute covers the following data elements:
  - SSN;
  - Driver's license or identification card number;
  - Student, military, or passport identification number;
  - Medical information;
  - Health insurance identification number; or
  - Biometric data (*e.g.*, fingerprints) used to authenticate an individual when they access an online account.

## Report Facts, Not Legal Conclusions

- Avoid using the "B" word.
  - "Breach" has a specific legal definition.
  - Use suspected "security incident" or "security event."
- Leave legal determination to counsel.

# Your Vendor, Your Data…Still Your Obligation



# The Employee Left. Did Their Access?

## BEFORE DEPARTURE

- Confirm timing + accountable owner
- Identify holds and business records
- Inventory devices and outside apps
- Plan authorized record transfer

## AT THE RIGHT TIME

- Disable identity + remote access
- Revoke sessions, tokens and badges
- Recover devices/company data
- Check third-party and delegated access

## AFTER DEPARTURE

- Verify access actually ended
- Review shared links and permissions
- Apply retention/deletion
- Close contractor and vendor access

# Employee Files are Not Fine Wine

## CLASSIFY



Recruiting
Personnel Benefits
HR investigations

## SCHEDULE



Owner + Legal Basis
Retention Period by Category

## CHECK HOLDS



Litigation/ Charges
Investigations
Suspend Deletion

## EXECUTE



Restrict Access
Securely Delete
Verify Vendor Action

**“Forever, just in case” is not a retention schedule.**

# What to Do Next?

## HR-Led Initiatives

- List data systems + AI tools used for HR purposes.
- Locate employee privacy notices and workplace monitoring disclosures; flag mismatches (e.g., policy vs. actual practices).
- Confirm incident contacts and the offboarding checklist.

## Joint Initiatives

- Work to address policy mismatches.
- Test offboarding with IT/Security in light of third-party tools.
- Review high-risk vendor contracts + AI use terms.
- Run an incident drill table-top exercise.

# Don’t Wait for a Fire: Be Proactive About Employee Privacy and Security



# Stay Informed/ Any Questions?

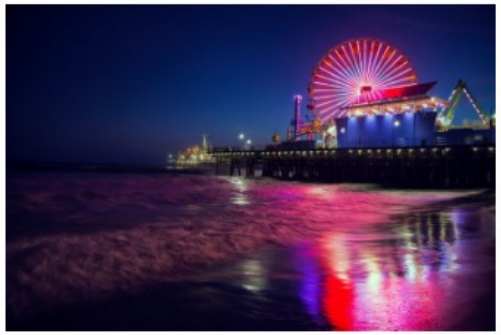



## Changing Tides: A Los Angeles Court Delivers a Major CIPA Defense Win



By Jordan Jennings on June 29, 2026

Posted in California, Data Privacy, State Privacy Laws



The California Information Privacy Act (CIPA) has become a go-to vehicle for plaintiffs' counsel attacking website tracking technologies, such as cookies, pixels, beacons, chat bots, and video or session replay tools.

Over the last few years, website operators have been hit with a wave of demand letters claiming CIPA violations. But the tide may be shifting – marking smoother sailing for website operators. A recent decision from a California court narrows CIPA to telephonic communications and significantly undercuts the viability of CIPA claims against commercial websites.

**Privacy, Security, and Artificial Inte...**
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Have you ever been recorded by an AI notetaker? Most of us have. But according to a recent decision out of the Northern District of California, AI notetakers may be recording not just the words you speak, but the unique biometric identifiers that comprise your voiceprint. In his latest blog, Taft lawyer Beau Braswell analyzes how a new lawsuit could spur a new avenue for claims under BIPA and other state and federal privacy laws. https://bit.ly/4r2Xnia



Taft/

# Navigating Immigration Enforcement: From Uncertainty to Compliance

**Kreuza Lako Gjezi**

Partner / Taft



# The 2026 Landscape: Immigration Compliance is an Enterprise-Wide Risk

The policy environment has changed.  Employer obligations remain.

- Worksite enforcement may involve more than I-9 review, including inquiries into suspected fraud, employment authorization, and related employer violations.
- ICE, USCIS, DOJ, and DOL have distinct authorities that may intersect in employer matters.
- Employers face potential civil penalties, criminal exposure, federal contracting consequences, operational disruption, and reputational harm.

# Who is Looking at Employer Compliance?

Different agencies, different authorities.

- **Immigration and Customs Enforcement (ICE) - Homeland Security Investigations (HSI)**
  - Form I-9 inspections, worksite investigations, subpoenas, and potential civil or criminal enforcement
- **U.S. Citizenship and Immigration Service (USCIS) - Fraud Detection and National Security Directorate (FDNS)**
  - Site visits and verification associated with immigration benefit petitions.
- **Department of Justice (DOJ) - Immigrant and Employee Rights Section (IER)**
  - Discrimination, unfair documentary practices, and retaliation under applicable immigration-related employment laws
- **Department of Labor (DOL)**
  - H-1B program compliance, PERM program compliance, required wages, working conditions, and related labor obligations

# Employer Obligations: The I-9 Fundamentals

## Form I-9 remains the first line of compliance.

- Employer must complete a Form I-9 for each employee
  - Except individuals hired on or before 11/6/1986, independent contractors, workers outside of the US, and casual domestic workers
- Form I-9 has 2 sections:
  - Section 1 - employee information and attestations. It must be completed by the employee no later than their first day of work
  - Section 2 – employer must complete within three days of employment and complete inspection of employee provided documents
- Retention
  - Employers are required to retain I-9 records for 3 years after start date of employment or 1-year after last day of employment, whichever is later
- E-Verify and E-Verify+
- Electronic I-9s

# Consequences of I-9 Non-compliance

- Monetary Penalties (subject to change):
  - Knowingly hire and continue to employ violation ($716 to $5,724 per violation)
  - Substantive and uncorrected violation ($288 - $2,861 per violation)
  - Subsequent offenses ($5,724 - $28,619 per violation)
- Criminal Penalties – a pattern of hiring unauthorized workers can lead to criminal penalties
- Mitigating Factors:
  - Penalties can be adjusted +/- 5% to 25% based on business size, good faith, seriousness, history, and cumulative nature of violations
- Debarment:
  - Knowingly hire and continue to employ can prevent employers from participating in future federal contracts and receiving other government benefits

# The Document Trap, E-Verify, and Discrimination

- Anti-discrimination provisions may be triggered by:
- Requesting specific and/or additional, unnecessary documents during Form I-9 completion process
- Refusing to accept valid documents during Form I-9 completion process
- Verification must be consistent and nondiscriminatory
- Avoid requesting additional documents based on national origin, citizenship status, accent, or perceived immigration status. Improper documentary demands, discriminatory reverification, and retaliation can create independent liability
- E-Verify requirements depend on the employer and jurisdiction

# ICE at the Door: Audit, Site Visit, or Raid?

| Type of encounter | What it generally means | Immediate response |
| --- | --- | --- |
| • Form I-9 Notice of Inspection (NOI) | • ICE requests Forms I-9 and employment verification records | • Preserve records, notify counsel, confirm deadlines. |
| • USCIS FDNS site visit | • Verification of information in an immigration benefit petition | • Verify credentials, notify the designated contact, follow protocol |
| • Subpoena or formal record request | • A request or command for specified records or information | • Preserve relevant materials and have counsel assess the document and response obligations |
| • Worksite enforcement action or raid | • Agents may seek to execute warrants, conduct arrests, or carry out other authorized enforcement activities | • Activate the response team, assess legal authority, and do not obstruct |

# Warrants and Workplace Access

- **Permission v. legal authority**
- Public areas: Agents generally may enter areas genuinely open to the public
- Private, non-public areas: Employers generally may refuse consent to entry or search absent sufficient legal authority or applicable circumstances.
- Judicial warrants: Review the issuing court, address, authorized areas, scope, and any limitations.
- Administrative immigration warrants: Forms I-200 and I-205 are not judicial search warrants and generally do not independently authorize entry into private workplace areas without consent.

- **Do not obstruct lawful enforcement, but do not casually consent to a warrantless search of a private area.**

# Before the Knock: The Employer's Action Plan

- Audit and remediate:
  - Conduct regular I-9 reviews, correct errors lawfully, and review relevant visa records and public access files, where applicable.
- Establish access protocols
  - Define public and restricted areas, visitor procedures, access controls, and escalation steps.
- Designate the response team
  - Assign primary and backup contacts across HR, leadership, and immigration counsel.
- Prepare for business continuity
  - Plan for staffing, payroll, employee concerns, and operational disruptions

# Ready Before It Happens

- **Own it**: assign clear accountability
- **Verify it**: review records, policies, and gaps
- **Rehearse it**: make sure everyone knows the response plan

The question isn't whether you're prepared on paper.  It's whether you're prepared in practice.

If agents arrived tomorrow morning, would your team know what to do?

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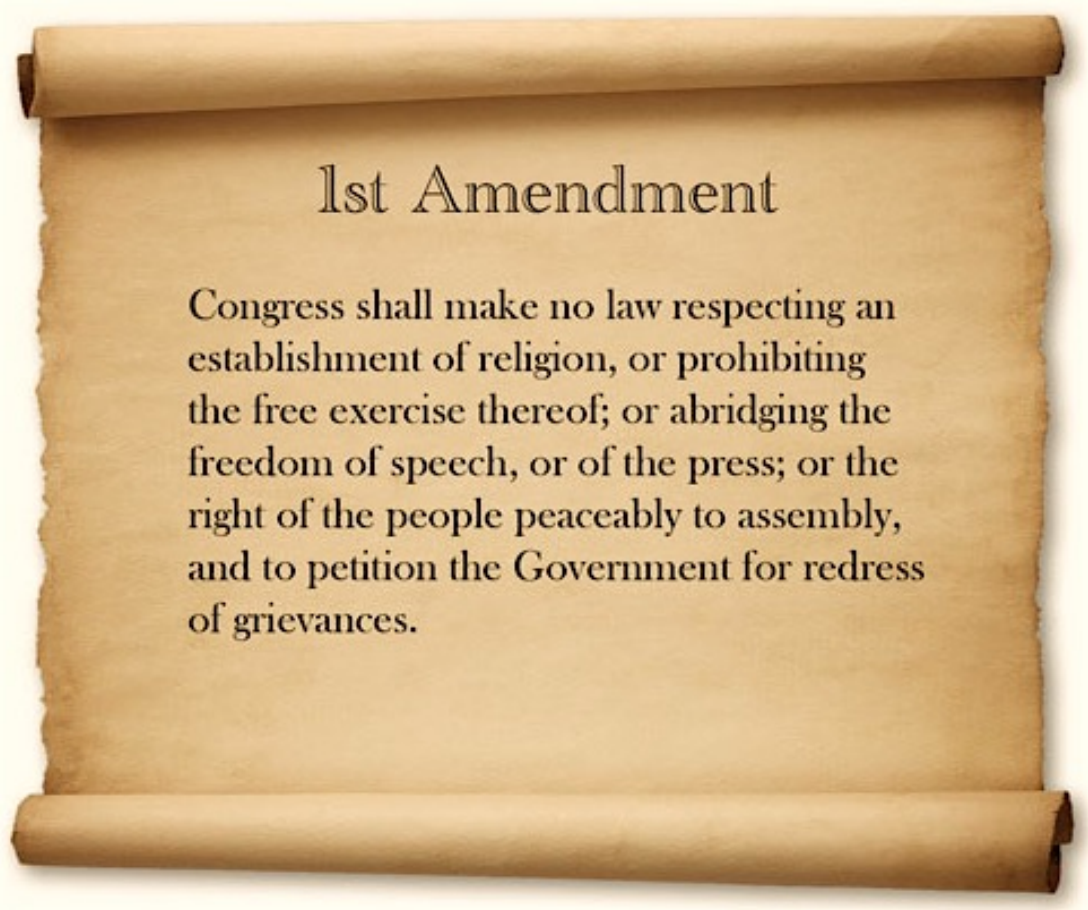
# Trending but Tricky: Free Speech, Social Media, and Employer Responsibilities

**Michael Freimann**

Partner / Taft



# First Amendment




- **"Congress shall make no law…"**
- The freedom-of-speech protections under the First Amendment of the U.S. Constitution apply to federal, state, and local government entities and do not extend to private employers.

# Legal Framework

Is the employer a public or private employer?

If the employee is employed by a private employer, is the employee or the employee's speech subject to any non-constitutional protections?

If the employee is employed by a public employer, was the employee speaking as a private citizen on a matter of public concern, and would disciplining the employee strike the right balance of competing interests?

# Private Employers

- First Amendment does not apply
- However, private employers should still consider other legal protections an employee may have, such as:
  - Employment contract / employee handbook
  - Whether speech is protected concerted activity (NLRA)
  - State statutes
  - Retaliation / whistleblowing
  - Discrimination claims

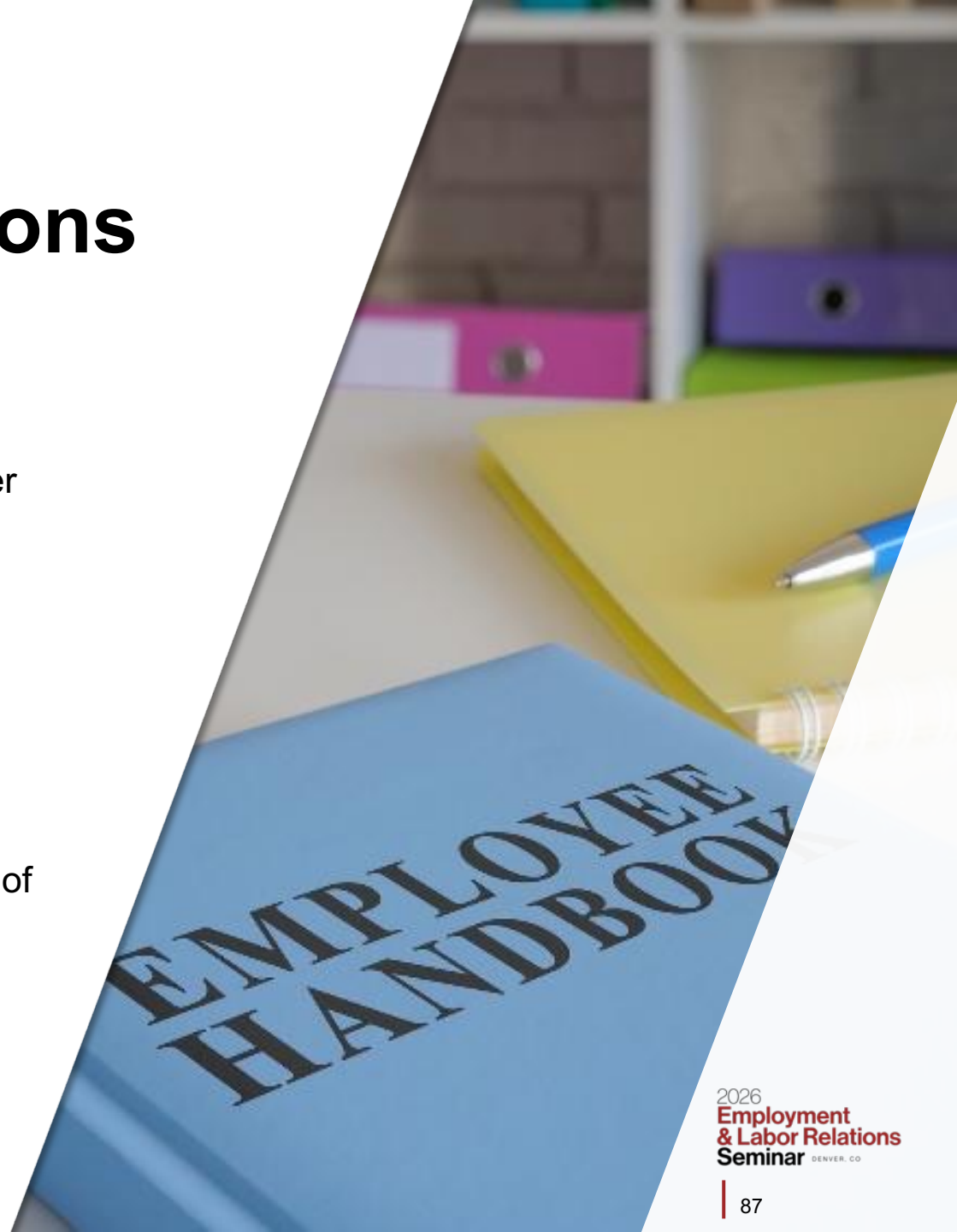


# Duties to Other Employees/Company

- Hostile work environment/harassment of other employees
- Handbook/social media policy violations
  - Employer should have policy in place
  - Disclosing confidential information (client info)
  - Reputation of company
  - Defamatory comments about company
  - Racy images or illegal activity

# Private Employers: Exceptions

- **Contractual protections**
  - Does the employee have a contract which dictates under what circumstances they may be disciplined (i.e., employment contract, employee handbook, or collective bargaining agreement)?
  - May the employee be terminated other than for Cause? What is Cause?
- **Concerted activity**
  - If the speech was made for the mutual aid or protection of others in a group of employees, then discipline or termination may violate the NLRA.
  - Complaints about pay, terms of employment, working conditions

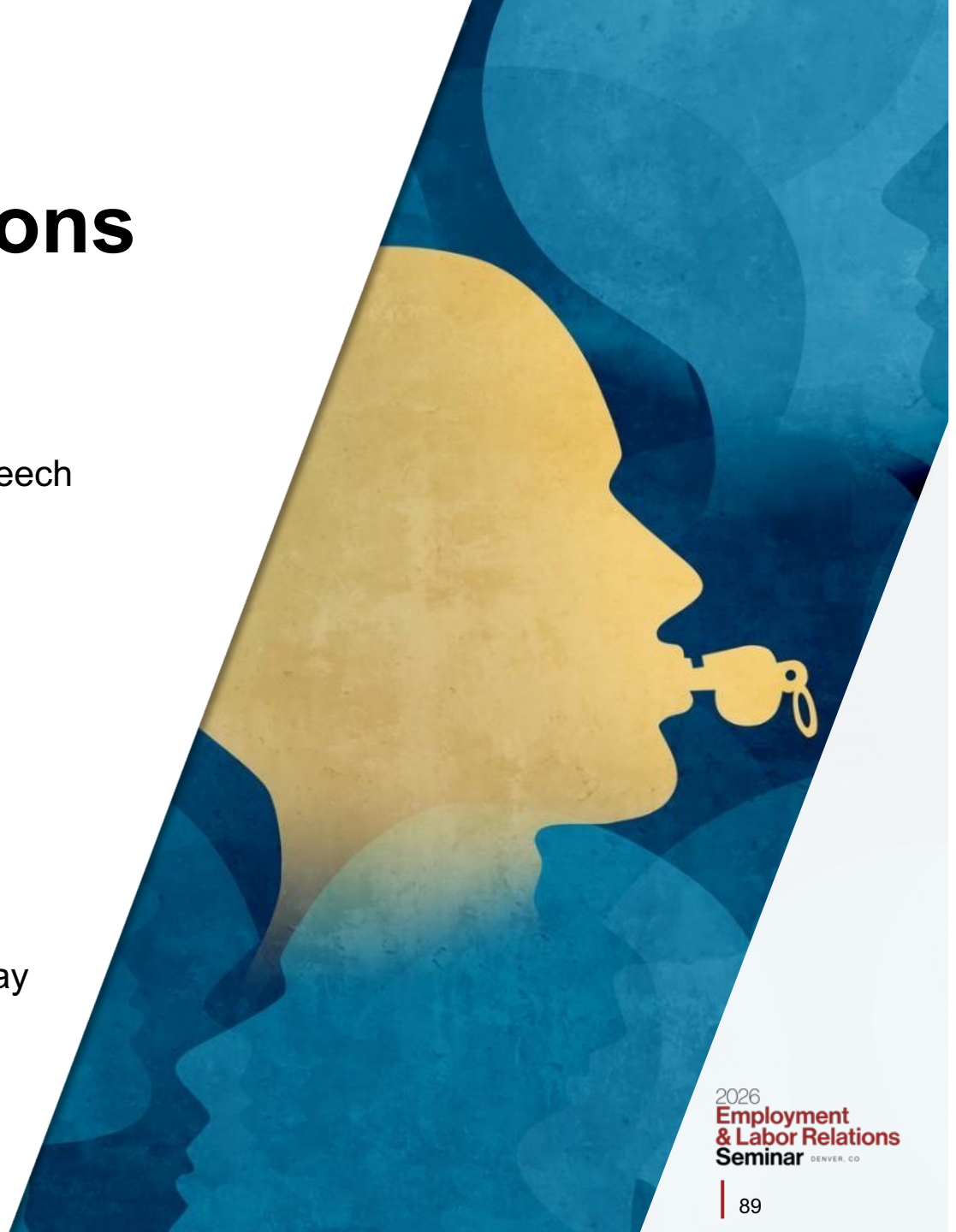


# Private Employers: Exceptions

- Political Activities/State statutes: Many states have statutes that prevent employers from interfering with employees' political activities
  - California, Colorado, Louisiana, Minnesota, Missouri, Nebraska, Nevada, South Carolina, and West Virginia criminalize interference with an employee's political activity
    - Colorado's law:
    - Private employers: Cannot ban political activity or candidacy in their workplace policies. They also cannot condition employment on political affiliation.
    - Public/state employees: Can engage in political activity, but cannot use state time, facilities, or authority for political purposes.
  - The District of Columbia, Illinois, Iowa, Louisiana, New York, Puerto Rico, and Washington prohibit discrimination against employees either based on party membership or their electoral activities
  - Arizona, Georgia, Iowa, Louisiana, Massachusetts, Minnesota, Missouri, Ohio, Oregon, and Washington protect individuals for signing petitions and making campaign contributions

# Private Employers: Exceptions

- **Retaliation / Whistleblowing**
  - Employers may not retaliate against employees for engaging in protected activity, which includes certain speech and expression
  - Whistleblowing is protected activity that occurs when an employee complains, with a reasonable belief, about wrongdoing by the employer
  - Wrongful termination in violation of public policy
- **Concerted activity**
  - Except in some states, political party generally is not a protected class. However, employers should consider whether disciplining employees for public statements may result in a disparate impact to any protected class



# Off-Duty Conduct State Laws

- Several states protect lawful, off duty activities
  - Weighed against conflict of interest with company
- Using tobacco, e.g.
  - Connecticut, the District of Columbia, Indiana, Kentucky, Louisiana, Maine, Mississippi, New Hampshire, New Jersey, New Mexico, Oklahoma, Oregon, Rhode Island, South Carolina, South Dakota, and West Virginia
- Any lawful products – Marijuana, Alcohol, e.g.
  - Illinois, Minnesota, Missouri, Montana, Nevada, North Carolina, Tennessee, and Wisconsin
- Products and Activities
  - California, Colorado, Louisiana, New York, and North Dakota
    - Colorado makes it an unfair employment practice for an employer to terminate an employee for engaging in any lawful activity outside the employer's premises during nonworking hours



# Public Employers

- The First Amendment does apply to government employers; thus, the question is whether the government, as an employer, may limit an employee's free speech rights in the workplace
- If an employee is disciplined for speech made as a private citizen on a matter of public concern, courts analyze a number of factors to determine whether the discipline was appropriate
- Goal is to "balance between the interests of the [public employee], as a citizen, in commenting upon matters of public concern and the interest of the State, as an employer, in promoting the efficiency of the public services it performs through its employees." *Pickering v. Board of Education*, 391 U.S. 563, 568 (1968)

# Was the employee speaking as a public citizen on a matter of public concern?

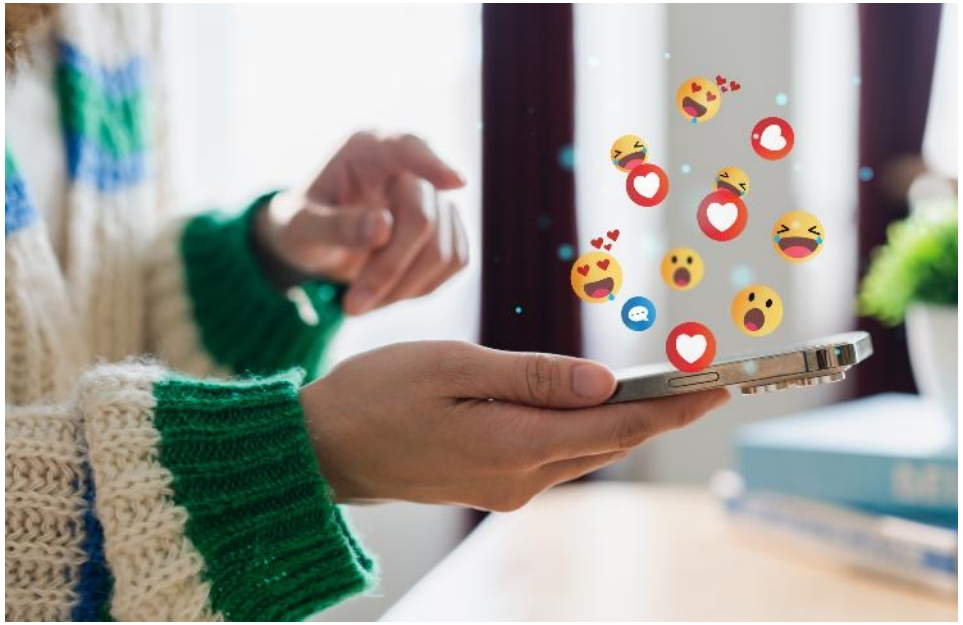
- When employees' speech occurs as part of their official duties, their speech fails to qualify for the protections afforded by the First Amendment
- Multi-factor test to determine whether the speech at issue is itself ordinarily within the scope of an employee's duties (not whether it merely concerns those duties)
  - Factors considered: Employee's job description, whether the speech occurred at the workplace, and whether the speech concerned the subject matter of the employee's job
- Matters of public concern are "something that is a subject of legitimate news interest; that is, a subject of general interest and of value and concern to the public at the time of publication"
- Speech is of public concern when "relating to any matter of political, social, or other concern to the community"
  - Examples: speech critiquing government and public officials, discussing or advocating for political candidates, advocating for causes, or discussing social and political issues

# Balancing Test

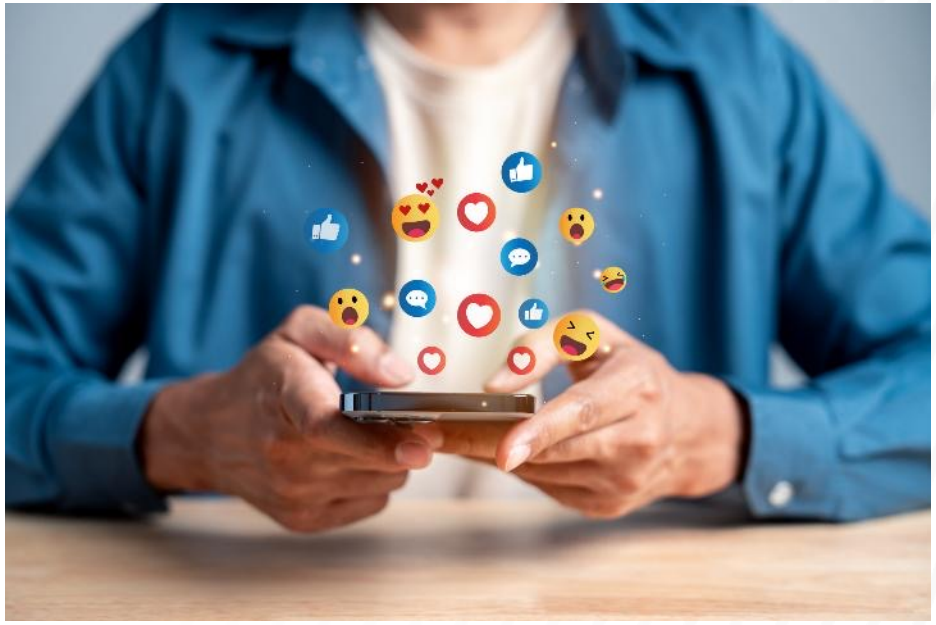
- Assuming that the speech is of the type that would be protected by the First Amendment, courts conduct a balancing test to determine whether there is a stronger interest in protecting the employer from **interference with the job** vs. protecting the **employee's right to engage in free debate**
  - Interference with job: Does limiting the speech prevent workplace disruption and/or does the speech demonstrate the individual is unfit for the job?
  - Employee's right: Speech on public issues (other than political violence) occupies the "highest rung of the hierarchy of First Amendment values," and is entitled to special protection



# Employee Social Media Posts



PUBLIC EMPLOYEES' ONLINE SOCIAL MEDIA POSTS ABOUT PUBLIC MATTERS IS SUBJECT TO THE *PICKERING* BALANCING TEST.



PRIVATE EMPLOYEES' ONLINE SOCIAL MEDIA POSTS MAY (OR MAY NOT) BE PROTECTED, IF SUBJECT TO LEGAL PROTECTIONS (OTHER THAN THE FIRST AMENDMENT).

# Social Media Posts in the Hiring Process



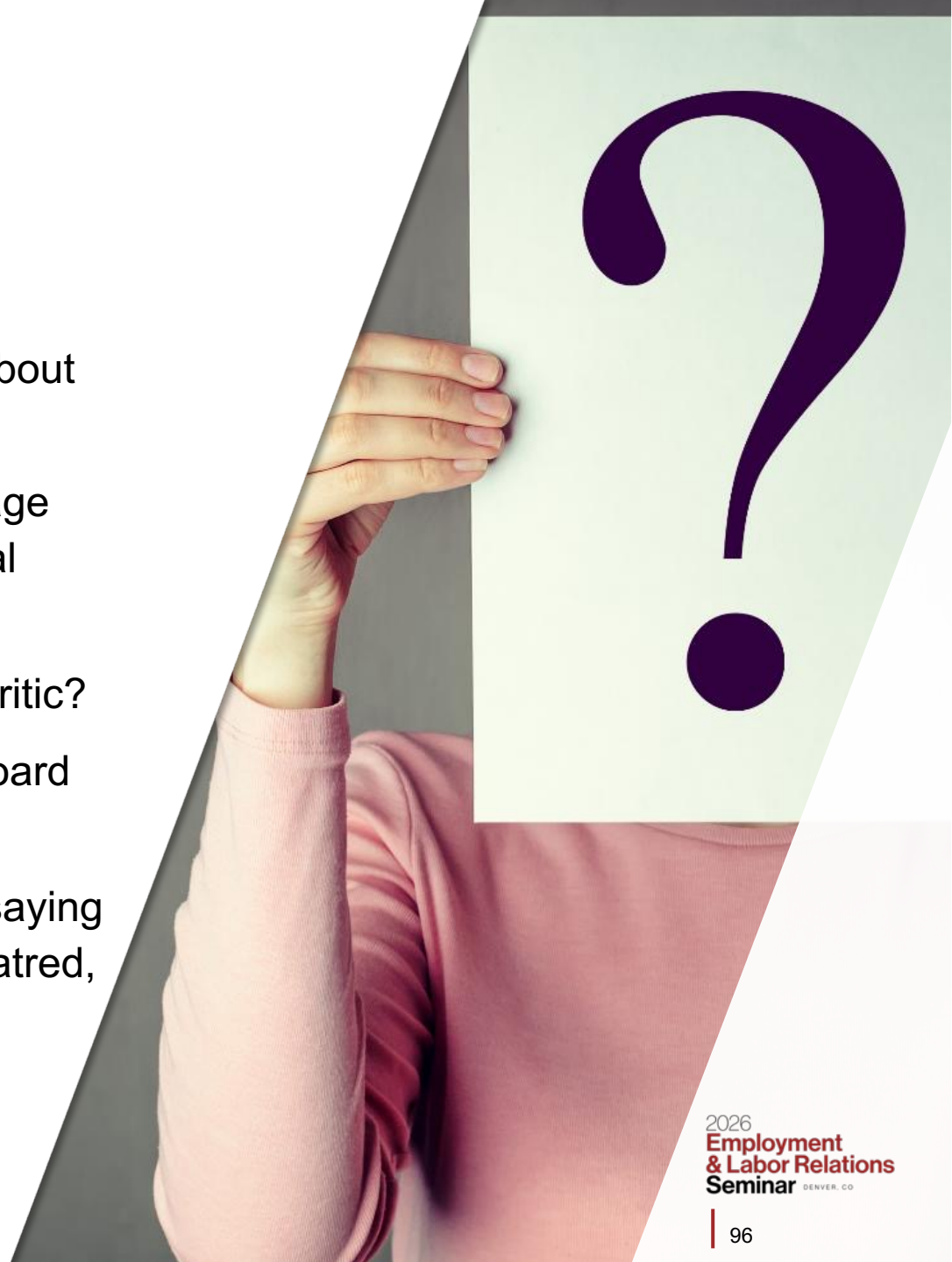
- Don’t: Use social media in violation of anti-discrimination laws (i.e., to assess or confirm someone’s protected status)
- Don’t: Use social media posts in the hiring process if state statute protects off-duty behavior
- Don’t: Ask an applicant for access to a private / non-public account



- Do: Check social media platforms that are related to the position (e.g., LinkedIn)
- Do: Ensure that any third-party social media checks are in compliance with the FCRA
- Do: Use social media as part of a larger recruitment plan / strategy

# Is It Permissible?

- Tech company fires engineer for publishing open letter about women in the workplace?
- Real estate agent fired after writing discriminatory message to waiter on receipt, a picture of which went viral on social media?
- News commentator fired for tweeting a Nazi salute at a critic?
- High school teacher fired for writing racial slur on whiteboard in class?
- Public college professor fired for private Facebook post saying that popular political commentator's death "reflects the hatred, fear and violence he sowed"?



# Takeaways: Best Practices

- Have clear communication policies in place, and educate managers on how to enforce them
- Conduct prompt, thorough investigation into any concerns
- Assess actual workplace impact of speech to determine if de-escalation may be more appropriate.
- Before discipline, check applicable contract(s) and local laws
- Enforce any discipline neutrally and consistently.
- Document rationale for any adverse employment action
- Contact legal counsel

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