

## 2026 California Employment Law Updates

### 1. Wage & Hour Updates

#### A. Minimum Wage & Salary Thresholds

Effective Jan 1, 2026:

- CA minimum wage: **\$16.90/hr**
- City of San Diego minimum wage: **\$17.75/hr**
- Exempt salary threshold: **\$70,304/year**
- Computer professional: **\$122,573.13/year or \$58.85/hr**
- Separate requirements for Inside/Outside Sales

**Healthcare worker wage schedule:**

- Effective Oct 16, 2024: \$18–\$23/hr depending on facility
- **By July 1, 2026:** Large systems & dialysis clinics must pay **\$25/hr**
- **By January 1, 2026:** Exempt salary for healthcare workers is the greater of 150% of healthcare workers minimum wage or 200% of the applicable state minimum wage

#### Los Angeles Metroplex

- **Effective July 1, 2026**, City of Los Angeles hotel and airport: **\$25/hr**  
**Effective July 1, 2025**, (with increase in July 2026) County of Los Angeles: **\$17.81/hr**

#### Updates by individual CA Cities:

- Belmont: \$18.95 per hour.
- Burlingame: \$17.86 per hour.
- Cupertino: \$18.70 per hour.
- Daly City: \$17.50 per hour.
- East Palo Alto: \$17.90 per hour.
- El Cerrito: \$18.82 per hour.
- Foster City: \$17.85 per hour.
- Half Moon Bay: \$17.91 per hour.
- Hayward: \$17.79 per hour for employers with 26 or more employees; \$16.90 per hour for employers with 25 or fewer employees (per state law).
- Los Altos: \$18.70 per hour.
- Menlo Park: \$17.55 per hour.
- Mountain View: \$19.70 per hour.
- Novato: \$17.73 per hour for employers with 100 or more employees; \$17.46 per hour for employers with 26-99 employees; \$16.90 per hour for employers with 1-25 employees.
- Oakland: \$17.34 per hour.
- Palo Alto: \$18.70 per hour.
- Petaluma: \$18.31 per hour.
- Redwood City: \$18.65 per hour.
- Richmond: \$19.18 per hour.
- San Carlos: \$17.75 per hour.
- San Diego (city): \$17.75 per hour.
- San Jose: \$18.45 per hour.
- San Mateo (city): \$18.60 per hour.
- San Mateo County: \$17.95 per hour.
- Santa Clara: \$18.70 per hour.
- Santa Rosa: \$18.21 per hour.
- Sonoma (city): \$18.47 per hour for employers with 26 or more employees; \$17.38 per hour for employers with 25 or fewer employees.
- South San Francisco: \$18.15 per hour.
- Sunnyvale: \$19.50 per hour.
- West Hollywood: \$20.25 per hour.

#### Suggested Action Plan:

- Check your individual city for updated minimum wage updates

- Audit your pay rates for all employees
- Employers will need to update their required employment posters and notices for 2026
- Employers in the hospitality industry should watch industry-specific minimum wage schedules — including Los Angeles City's hotel and airport worker minimum wage (which also sets the rate for Santa Monica hotel workers)
- San Diego's new Hospitality Minimum Wage Ordinance for hotel, event center and amusement park employees, with phased-in increases over the next several years.
- Ensure that your exempt employees are above the exempt salary threshold of \$70,304 annually (\$122,573.13 for Computer Professionals) also verify duties to ensure they still meet duties test. Perform a separate test for Inside/Outside Sales positions.

## **B. SB 648 — Tips & Gratuities Enforcement**

Strengthens enforcement under Labor Code §351.

Key provisions:

- Tips are **sole property of employees**
- No deductions for **credit card fees**
- Credit card tips must be paid by **next payday**
- Penalties:
  - \$100 initial violation
  - \$250 subsequent violations
- Labor Commissioner may issue citations or file civil actions.

## **Suggested Action Plan:**

- Audit existing tip policies especially if you are in the hospitality, restaurant, and hair and nail business

## **C. Other Wage & Hour Laws**

### **SB 261 - Enforcement of Labor Commissioner Awards**

If a final judgment arising from nonpayment of wages for work performed in California remains unsatisfied after 180 days, a court may enforce the judgment and impose a civil penalty on the judgment debtor that is up to three times the outstanding judgment amount, plus interest, reasonable costs and attorney's fees.

## **Suggested Action Plan:**

- Confirm you are paying employees for all time worked
- Ensure you are paying out *all* unused accrued vacation at time of separation
- Remember to pay out bonuses that were *earned* during the employee's tenure

## **AB 751 — Rest Break Exemption for Petroleum/Refinery Workers**

- Extends "safety-sensitive" rest break exemption indefinitely
- Missed rest break: **1 hour of pay** at regular rate

## **AB 1514 — Extension of ABC Test Exemptions**

- Licensed manicurists → exemption extended to **Jan 1, 2029**

- Commercial fishers → exempt until **Jan 1, 2031**
- If exempt, apply the **Borello** test.

## 2. New Laws for 2026

### A. SB 294 — Workplace Know Your Rights Act Notice

Employers must provide a **stand-alone annual written notice** informing employees of rights related to:

- Workers' compensation
- Immigration inspections
- Union organizing & concerted activity rights
- Constitutional rights during law enforcement interactions
- New legal developments & list of enforcement agencies

**Emergency Contact Designation:** By March 30, 2026, employers must allow employees to designate an emergency contact or collect this information from new hires going forward. Also requires employers to notify an employee's emergency contact if the employee is arrested or detained while at work.

#### Deadlines & Requirements:

- **By Feb 1, 2026:** Provide notice to all current employees (and yearly thereafter).
- **At hire:** Provide notice to all new employees.
- **By Mar 30, 2026:** Allow employees to designate an *emergency contact* if arrested or detained at work.
- Labor Commissioner will publish a template by **Jan 1, 2026 (recommend not to use other templates)**.
- Enforcement by Labor Commissioner or public prosecutors.
- Penalties: up to **\$500 per employee**, or **\$10,000** for failing to contact emergency contact and other violations.

#### Suggested Action Plan:

- Plan now for multi-language versions and distribution/tracking
- Add SB 294 notice to annual compliance checklist
- Use official Labor Commissioner template – not ones on the internet
- Update onboarding checklist & HR policies
- Train staff and track compliance
- Maintain records for 3 years

### B. SB 513 — Expanded Personnel Record Requirements

Beginning **Jan 1, 2026**, the definition of "personnel records" expands to include any grievance concerning the employee and **education and training records**, such as:

- Employee name
- Training provider
- Date/duration of training
- Core competencies
- Certifications/qualifications

Employers must still comply with existing deadlines:

- **30 days** to produce personnel files

- **21 days** to produce payroll records

#### **Suggested Action Plan:**

- Coordinate with Human Resources Information System (HRIS) and Learning Management System (LMS) vendors to ensure records can be accessed in a usable form.
- Ensure compliance with deadlines specified in the statute since noncompliance can result in penalties, legal costs, etc.

#### **C. AB 406 — Expanded Victim Protections & Paid Sick Leave Use**

This “clean-up bill” to AB 2499 (2025) now allows victims and impacted family members to take leave for **judicial proceedings** related to a greatly expanded list of “covered crimes.”

##### **Expanded Definition of “Victim”:**

Includes individuals harmed by:

- Violent felonies
- Serious felonies
- Certain felony theft/embezzlement offenses
- Vehicular manslaughter, felony DUI causing injury
- Hit-and-run causing injury/death
- Child abuse, felony domestic violence, stalking
- Felony elder abuse, assault, solicitation for murder, and other serious felonies

Employees may also use **Paid Sick Leave** to attend **judicial proceedings**.

This bill prohibits discharge, discrimination, or retaliation against employees who are victims-or family members of victims-from taking time off to attend judicial proceedings related to specified crimes.

#### **Suggested Action Plan:**

- Ensure managers and HR understand these protections to avoid inadvertent retaliation
- Update crime victim leave policy and accommodation policy for victims of crime
- Update sick leave pay policy to include use for qualifying acts of violence
- Look for new government brochure

**C. AB 10 – Protection Against Threats in the Workplace** adds section 422.3 to the California Penal Code, making it an explicit criminal offense to make credible threat of mass violence against persons “at a daycare, school, university, **workplace**, house of worship, or medical facility.”

#### **D. SB 617 — New Cal-WARN Notice Requirements**

Effective **Jan 1, 2026**, Cal-WARN notices must now contain additional disclosures regarding coordination with workforce development services. Cal-WARN applies to all employers in California that operate a California “covered establishment,” that employs, or has employed within the preceding 12 months, 75 or more persons and will suffer a “mass layoff,” of 50 or more employees within a 30-day period regardless of % of workforce a “termination,” or Plant closure affecting any amount of employees or a “relocation” of at least 100 miles affecting any amount of employees of a covered establishment. The employer must provide the employees, the California Employment Development Department, the local workforce investment board, the chief elected county official and

the chief elected city official for the worksite where the mass layoff, termination or relocation is scheduled to occur, at least 60 days' notice before the effective date.

Required elements now include providing the following information **in writing**:

- Employer's functioning **email and phone number**
- A functioning email and telephone number of the local workforce development board **must** be included
- Employers **must** include scripted language highlighting the services provided by the workforce development board
- Description of **rapid response activities**
- **CalFresh** program description, helpline number, and website link

Applies even if the employer does *not* plan to coordinate services.

### **Penalties**

If employers do not provide ***all of the required information*** listed above, the notice **will not constitute a bona fide Cal-WARN Notice**, and the employer may be subject to penalties or other legal consequences (e.g. up to 60 days of pay for each laid off employee)

### **Suggested Action Plan:**

- If your company is facing a potential WARN Act situation, seek assistance from your attorney or CAHR Consultant to assist with preparing notices and communications to employees and other appropriate external government and regulatory stakeholders.

## **E. SB 590 — Paid Family Leave (Designated Person)**

Effective **July 1, 2028**, PFL eligibility expands to include a **designated person**, defined as someone related by blood *or* someone with a relationship equivalent to family.

- Attestation under penalty of perjury is required.
- Employees continue to have **8 weeks** of PFL benefits.

### **Suggested Action Plan:**

- Update family leave definitions and leave policies in employee handbooks

## **F. SB 642 — Pay Equity Enforcement Act- Amendments to California's Equal Pay Act**

Key changes:

- New “pay scale” definition: **good-faith estimate of salary/wage range at hire**.
- Expanded definitions:
  - “Opposite sex” → “another sex”
  - “Wages” → includes **all forms of pay**, such as bonuses, stock, allowances, lodging reimbursements
- Statute of limitations: **3 years**
- Recovery period: **up to 6 years**

### **Suggested Action Plan:**

- Audit job postings and pay scale disclosures for compliance
- Conduct a pay equity analysis including *all* forms of compensation
- Document legitimate, non-discriminatory reasons for pay differentials
- Train HR and managers on updated definitions and expectations

### **G. SB 464 — Pay Data Reporting Expansion**

Beginning **May 2027**:

- Employers must classify workers under the **23 SOC categories**, replacing the 10 EEO-1 categories.
- Courts *must* impose civil penalties for failure to file.
- Demographic data must be stored **separately** from personnel files.

### **Suggested Action Plan:**

- Applicable employers required to file the EEO-1 report shall avoid penalties by filing the report on time!

### **H. AB 858 — Rehiring & Retention Rights for Displaced Workers**

Extends COVID-era recall protections to **Jan 1, 2027**, for employees working in:

- Airport hospitality/service providers
- Building service contractors
- Event centers
- Hotels with 50+ rooms
- Private clubs

### **Key employer obligations:**

- Must offer open positions **first** to laid-off qualified workers, based on seniority.
- Must notify workers within **5 business days** via mail (and by email/text if available).
- Workers must have **5 business days** to respond.
- If not rehiring due to qualifications, employer must provide written notice.

### **Suggested Action Plan:**

- Keep an updated seniority list and document your compliance with the timelines of the statute.
- Train HR and managers about this recall obligation

### 3. Significant Cases Affecting Businesses

#### A. CRST Expedited, Inc. v. Superior Court (2025)

- “Headless” PAGA claims (seeking penalties only for others, not the plaintiff) permitted.
- Conflicts with *Leeper v. Shipt* (2024), where headless PAGA actions were disallowed.
- California Supreme Court reviewing the issue.

#### Suggested Action Plan:

- Timely pay fees or risk waiving the right to enforce arbitration agreements
- Mutually agree to an extension of the payment deadline

#### B. Iloff v. LaPaille (2025)

Key holdings:

- Ignorance of wage laws does **not** establish a good-faith defense to liquidated damages.
- Employers must make **reasonable effort** to understand legal obligations.
- Paid sick leave claims may be raised **for the first time on appeal** from a Labor Commissioner decision.

#### C. Bradsberry v. Vicar (2025)

- Revocable, prospective (written) meal period waivers for shifts 5–6 hours are **enforceable**.
- Waivers must not be coercive or unconscionable.
- Procedural irregularities could invalidate the waiver.
- No employer retaliation for revoking the waiver.

#### Suggested Action Plan:

- Include a properly drafted blanket meal period waiver as part of the onboarding documents

### 4. Discrimination, Harassment & Retaliation

#### A. SB 303 — Bias Mitigation Training

- An employee’s good-faith acknowledgment or admission of personal bias during training does **not** constitute discrimination.
- Intention is to encourage employers to conduct bias mitigation training.

#### B. SB 1137 -- Intersectionality Discrimination

- FEHA clarified to prohibit discrimination on the basis of intersectionality (combination) of two or more protected traits

#### Key Case Law

#### Lam v. University of Hawaii (2024)

- Key legal precedent demonstrating how discrimination can target unique, intersecting identities, paving the way for better legal recognition of individuals facing combined forms of bias.

- The case is famous for adopting an intersectional framework, explicitly stating that discrimination against an Asian woman isn't just race or gender bias, but a unique combination.

## B. Key CA Case Law

### Kruitbosch v. Bakersfield Recovery Services (2025)

- Off-site, non-work-related harassment is generally not imputable to the employer.
- BUT an employer's **response (or lack thereof)** to such a complaint can create a hostile work environment.

### Carranza v. City of Los Angeles (2025)

- Court upheld a **\$4 million** harassment verdict.
- Employer took almost no action to address distribution of false nude images of employee.
- Direct face-to-face harassment is not required to bring a claim.

## C. Key Federal Case Law

### Ames v. Ohio Dept. of Youth Services (2025)

- Majority-group plaintiffs do *not* need to show "background circumstances" to bring discrimination claims.

### State of Louisiana v. EEOC (2025)

- PWFA regulations cannot require accommodations for **elective abortions**.
- Other documentation-limiting rules remain intact.

### Suggested Action Plan:

- Train HR to take all complaints seriously; **inaction = liability**.
- Remember, even off-duty misconduct can expose an employer to liability if management mishandles or trivializes a harassment report.
- Prompt, respectful, and consistent responses are critical

## 5. Automated Decision Making Systems and AI Regulation (Effective Oct 1, 2025)

Applies to all CA employers with **5+ employees** and all employer agents.

### Definition & Examples

ADS = computational processes that make or facilitate human decision making regarding an employment benefit  
Examples:

- Conduct computer-based tests assessing skills, aptitude, or personality
- Resume screening using algorithms that assess for terms or patterns
- Targeted job advertisement or other recruiting materials to targeted groups
- Analyzing facial expression/voice analysis in online interviews
- Analyzing third-party candidate data

### Prohibited Uses:

- Discrimination based on protected class
- Restricting applicants based on protected traits
- Screening based on disability unless job-related & business-necessary
- Unlawful medical/psychological exams
- Aiding/abetting unlawful discrimination

### **Obligations:**

- Retain all ADS-related data for **4 years**
- Retain complaint-related data until litigation timelines are fully exhausted
- Conduct well-documented third-party anti-bias testing
- Provide accommodation mechanisms
- Update policies, processes, vendor contracts
- Train HR, recruiters, and managers
- Provide pre-use and post-use notices explaining when and how ADS tools are used, what right they have to opt out, and how to appeal or request human review

### **Suggested Action Plan:**

- Conduct a full inventory: Audit all existing HR technology to identify which tools qualify as an ADS.
- Define the purpose and scope of your ADS
- Be careful with sensitive data – remember AI is **not designed to be secure**, it's all about data sharing and learning from that data
- Train staff on how ADS tools are used
- Preserve ADS-related records and data input, outputs, audit findings, and decision criteria for a minimum of four years
- Ensure that you add *human* reviews of the Gen AI outputs from your ADS
- Notify applicants and employees when ADS tools are being used to make employment decisions
- Require vendors to provide documentation of their anti-bias testing protocols, data use practices, and compliance with anti-discrimination laws.
- Offer reasonable accommodation and provide clear mechanisms for individuals to request an alternative assessment process or a human review.
- Ensure job-relatedness: Align the criteria the ADS uses directly with the essential functions and requirements of the specific job.

### **Significant Cases (2025)**

#### **Harper v. Sirius XM Radio (2025)**

- Pending class-action case alleging that Sirius XM's use of an AI-powered hiring tool systematically discriminated against Black applicants.
- Brings claims of racial discrimination under Title VII, arguing both disparate treatment and disparate impact.

#### **Mobley v. Workday (2025)**

- Major class-action case alleging claims of racial discrimination under Title VII, arguing both disparate treatment and disparate impact
- Claims Workday's tools filter candidates based on factors correlated with race, age, and disability, violating federal anti-discrimination laws (ADEA and Title VII)

## **ACLU v. Intuit/HireVue (2025)**

- Employer's use of automated video interview platform unfairly blocked her promotion due to AI-driven biases related to her disability and race.
- Employer refused to accommodate employee's request for human generated captioning.

## **AB 566- Opt Me-Out Act (Related to CA Privacy Protection Act)**

- Effective **January 1, 2027**, under California **Opt Me Out Act law**, businesses that operate websites in California must include web browser functionality for consumers to automatically send an opt-out preference signal to website operators.
- Specifies that opting out must be easy to locate and configure.

Note: California is the **first state** to adopt this type of law, as part of its efforts to increase the control consumers have over their personal data.

FYI- CAHR Services will develop AI and California Privacy policies once we have consulted with outside counsel.

## **6. Employee Mobility: Prohibitions on Stay-or-Pay Agreements (AB 692)**

Effective **Jan 1, 2026**.

Makes it unlawful to require employees to repay training/debt if employment ends, with limited exceptions.

### **Penalties:**

- Actual damages or **\$5,000 per worker**
- Injunctive relief, attorneys' fees, costs

### **Exceptions include:**

- Transferable credential tuition agreements (must be separate, prorated, no interest, no accelerated repayment, no repayment unless terminated for misconduct).
- Certain discretionary sign-on bonuses (separate agreement, 5-day review, option to defer payment, prorated repayment only, no interest, repayment only on voluntary quit or misconduct termination).

### **Suggested Action Plan:**

- Review offer letters, training repayment, and relocation agreements for compliance
- Create separate agreements
- Ensure proper electronic signature procedures
- Train HR on proration rules
- Remove any accelerated repayment terms

### **Penalties:**

- Monetary damages equal to either the worker's actual losses or \$5,000—whichever amount is greater, injunctive relief, and reasonable attorneys' fees and legal costs for the employee.

## **7. Labor Law Developments (AB 288) Expansion of PERB's Authority**

Authorizes **PERB** to enforce NLRA-like rights if NLRB fails to act within 6 months.

- Could allow PERB to certify unions, order bargaining, reinstate terminated employees, impose penalties.
- Would decide unfair labor practices that the NLRB has not resolved within six months.

### California private employers could face:

- Risk of **duplicate forums** and stronger leverage for unions.
- Expanded remedies: PERB may impose civil penalties, a sanction not available under the NLRA.
- Binding mediation orders and expedited remedies could tilt the balance of bargaining power.
- Uncertainty in compliance: Employers will be forced to navigate overlapping—and potentially conflicting—federal and state labor law obligations.

### Status:

- Enforcement is currently uncertain; facing federal preemption litigation.

## 8. Transportation Network Company Drivers Labor Relations Act (AB 1340)

Creates collective-bargaining-style rights for gig drivers who **are not classified as employees**.

TNCs must submit quarterly driver data to PERB (starting Jan 6, 2026), including:

- Email, phone, driver's license
- Residence address
- Join date
- Number of rides

PERB will then identify **active drivers** (those at or above the median number of rides).

Note: This unionization process is **materially different** from that under the NLRA. A TNC driver organization/union can begin the union organization process by making a showing to PERB that it has **a mere 10% support** among active drivers. (Usual process calls for obtaining signed authorization cards from **at least 30%** of employees to file for an election).

**Why is this important?** AB 288 and 1340 are landmark pieces of legislation aimed at significantly expanding and protecting unionization rights for workers in the state, particularly in the private sector and the gig economy. Meanwhile, unions are winning elections at a much higher rates (79.9% in 2024 vs 61% in 2022), particularly in higher education and healthcare.

### Suggested Action Plan:

- Know your rights and responsibilities under the National Labor Relations Act (NLRA) to avoid illegal activities like threatening or firing union organizers.
- Ensure open communication with your employees so they feel heard, valued and seen
- Resolve employee concerns promptly and proactively
- Make sure your pay and benefits are competitive
- Assure employees are treated fairly and respectfully
- Train managers to be effective leaders and communicators, focusing on positive employee relations
- Ensure strong compliance with federal law

## 9. Arbitration Developments

### A. Hohenshelt v. Superior Court (2025)

- Arbitration fees must be paid within **30 days**; late payment does not automatically void arbitration.
- Relief from forfeiture permitted if the breach is excusable and there is no prejudice.

## **B. Velarde v. Monroe Operations (2025)**

Arbitration agreement unenforceable due to:

- Procedural unconscionability (adhesion contract, insufficient review time, misrepresented terms)
- Substantive unconscionability (unfair procedural rules favoring employer)

A less severe level of procedural unconscionability could have saved the agreement.

## **10. One Big Beautiful Bill Act (OBBA) (July 2025)**

- H.R.1 aka the “One Big Beautiful Bill Act,” impacts a wide range of workplace matters, including immigration, benefits, and employment tax liabilities.
- The OBBBA includes new, non-waivable fees and stricter requirements that are expected to increase financial and administrative burdens for employers hiring non-citizen workers.
- Increases dependent care FSAs and employer-provided childcare credits, adds incentives for student loan and adoption assistance.
- OBBBA provides federal income tax deductions for a portion of an eligible worker’s tips and overtime earnings; deductions are temporary and expire after the 2028 tax year.

### **1. Impact on overtime and tip pay**

- Creates a temporary deduction from gross income for overtime hours and capped the deduction at \$12,500 (or \$25,000, in the case of a joint return) for all employees.
- Employers are required to separately report on Form W-2 the portion of the employee’s pay that is qualified overtime compensation.
- Effective for tax years beginning after Dec. 31, 2025, the procedures for withholding are to be modified to take into account this deduction
- Transition rules permit employers to approximate a separate accounting of amounts as qualified overtime compensation by any reasonable method specified by the IRS.
- Creates a separate deduction for tipped workers, allowing them to deduct up to \$25,000 of qualified tips earned.
- Tips paid voluntarily by the customer may be deducted; earnings from mandatory service charges assessed automatically to customers are not deductible. Tips received under tip-sharing arrangements count as qualified tips.
- Deduction only for tips earned in “traditionally and customarily tipped industries,” (e.g., hospitality industry, barber shops, hair and nail salons, spas).

### **2. Impact on Immigration**

- Introduces immigration-related changes that are likely to affect employers who recruit, employ, and sponsor foreign workers.
- Increases funding for Customs and Border Protection (CBP) and Immigration and Customs Enforcement (ICE), likely leading to more I-9 audits and worksite enforcement actions.
- Outlines new and increased fees on an array of immigration-related applications and processes, many of which cannot be waived or reduced (e.g., increased to \$550 for EADs and \$275 for Protected Status (TPS)).
- Employers who hire individuals under these categories may encounter higher costs or potential delays as employees work to obtain or renew their work authorization.

### **3. Impact on Benefits**

**The OBBBA introduces significant enhancements to employer-provided benefits.**

- Dependent care flexible spending accounts and FSAs have been increased from \$5,000 to \$7,500 (\$3,750 for separate returns filed by married individuals).
- Increases the employer-provided childcare credit and increased the maximum credit amount to \$2,200 per qualifying child beginning in 2025.
- Allows employers to offer telehealth services pre-deductible to employees HSA and a high-deductible health plan (HDHP); permanent change, retroactively Dec. 31, 2024.

### **Suggested Action Plan**

- Update payroll and reporting systems to meet new IRS rules on tips, overtime, and tax credit
- **For CA employers** -update payroll systems to **separately track and report qualified tips and FLSA-required overtime premiums** on W-2 forms for tax years 2025 through 2028.
- **Work closely with your payroll provider, CPA and HR Consultant for applicable updates**
- Ensure HSA's flexibility with telemedicine
- Be on the lookout for specific IRS guidance
- Ensure your I-9s have been audited recently
- Develop a **Rapid Response Team** to be prepared for an ICE Enforcement Action

**To further discuss these updates, evaluate their impact on your organization, and to develop a tailored HR strategy and implementation plan, please contact your dedicated Consultant or contact our CA/Nationwide HR office at [info@CAHRservice.com](mailto:info@CAHRservice.com) or 858-228-5535.**