2025 Mo-Kan

Annual Labor & Employment Law Seminar

Fisher Phillips

What's New, What's Next: Legal Update

October 30, 2025

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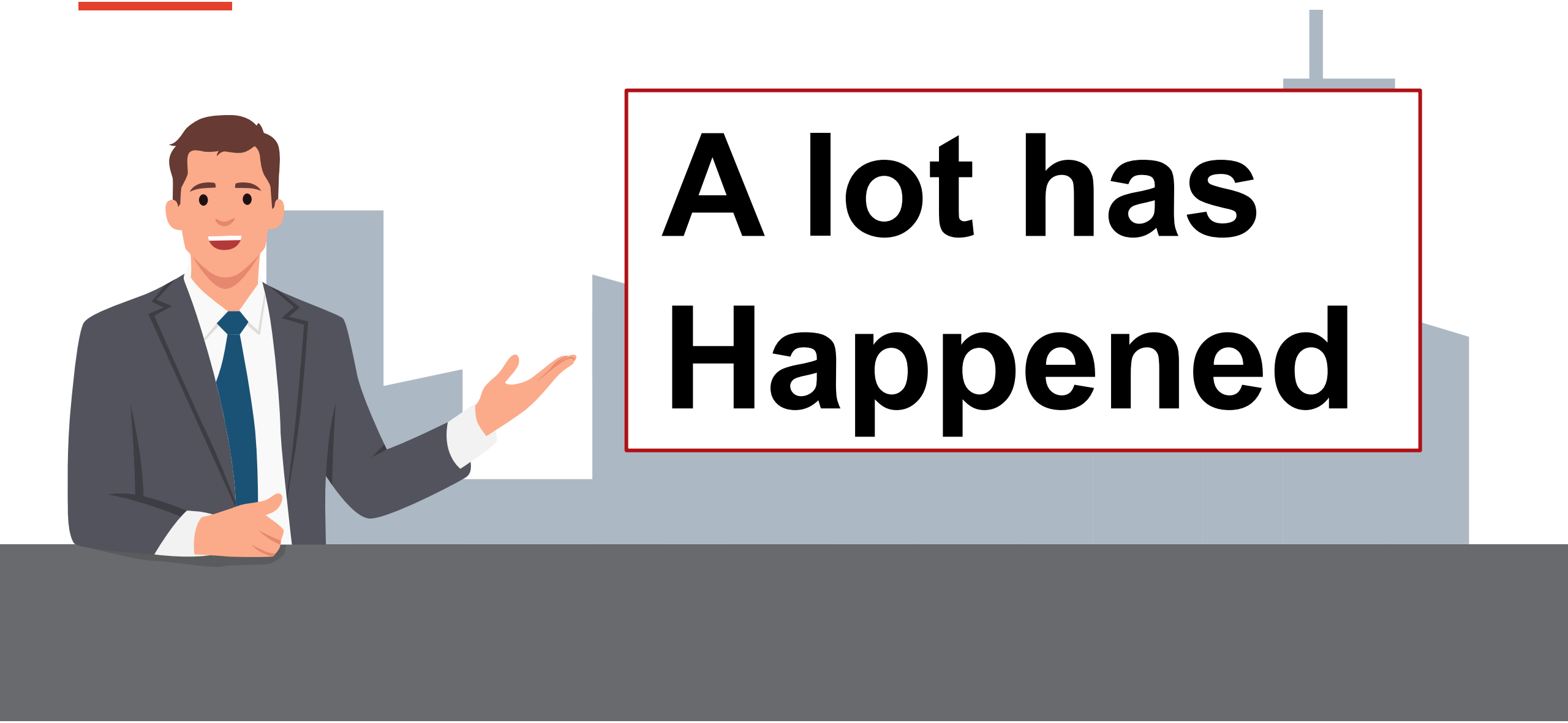

A lot has Happened

Executive Orders at Warp Speed

Important Reminders

The Executive Orders are still only months old

There are many court challenges still pending – and more to come

Executive Orders do not change established law

More change is coming – we have not seen how this will all play out yet

Executive Orders related to DEI

- **EO 14168 – Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government**
  - Requires federal government to recognize only two biological sexes as determined at conception
  - Removes the concept of "gender identity" from federal anti-discrimination laws
  - Rescinds the 2024 EEOC Workplace Harassment Guidance
- **EO 14173 – Ending Illegal Discrimination and Restoring Merit-Based Opportunity**
  - Federal pressure to end "illegal" DEI programs by redefining them as a form of discrimination
  - Uncertainty over what constitutes "illegal" DEI
  - Directs federal agencies to identify potential civil compliance investigations of large companies and identify potential lawsuits, regulatory action, or guidance to bring against those entities
  - DOJ considering criminal enforcement
  - No impact on Title VII

Executive Orders related to DEI (Continued)

- **EO 14281 – Restoring Equality of Opportunity and Meritocracy**
  - Calls for the repeal of agencies' disparate impact regulations under Title VI and Title VII of the Civil Rights Act of 1964 – characterized as a "key tool" of a "pernicious movement" that threatens the foundation of the American Dream.
  - At the same time, it encourages employers to use skills-based criteria rather than traditional credential like college degrees, often an employment barrier for some minority groups with less access to formal higher education

Disparate Impact – facially neutral policy or practice disproportionately and adversely affects a protected group, even though there is no intent to discriminate. It has been recognized as a concept under Title VII since 1971 – ***Griggs v. Duke Power Co.***

EEOC Guidance on DEI

The EEOC – along with the Department of Justice – released two new technical assistance documents providing some clarity for employers grappling with DEI compliance issues. Key takeaways:

- **Reminder on the scope of Title VII protections**. The guidance reminds employers that Title VII prohibits employment discrimination based on protected characteristics "no matter which employees are harmed," and noted that Title VII's protections "apply equally to all racial, ethnic, and national origin groups, as well as both sexes."

- **No 'reverse' discrimination.** The states that Title VII's protections apply equally to minority and majority groups. The EEOC does not require a higher showing of proof for so-called "reverse" discrimination claims. You should note that this issue is also before the Supreme Court this term.

EEOC Guidance on DEI (cont.)

- **No "business necessity" exception for DEI programs.** Title VII allows for a bona fide occupational qualification (BFOQ) in very limited circumstances to excuse hiring or classifying an individual based on religion, sex, or national origin – but this exception excludes race and color. The EEOC's new guidance highlights that Title VII does not provide any "diversity interest" exception to these rules.

- **Covered workers.** The EEOC added that Title VII protects employees, potential and actual applicants, interns, and training program participants.

Potentially Unlawful DEI Practices

DEI policies, programs, or practices may be unlawful under Title VII if they involve "an employment action motivated – in whole or in part – by an employee's race, sex, or another protected characteristic." Examples:

- **Quotas and other "balancing" practices** based on race, sex, or other protected characteristics.
- **Disparate treatment** based (in whole or in part) by a protected characteristic.
- **Limiting, segregating, and classifying employees** based on protected characteristics if it affects their status or deprives them of employment opportunities. (Examples: affinity groups that exclude employees, separating employees for trainings even if content is the same).
- **Harassment during DEI training**
- **Retaliation** for objecting to or opposing employment discrimination related to DEI, participating in employer or EEOC investigations, or filing an EEOC charge.

Practical Takeaways

1. Assess your DEI programs
2. Ensure hiring, promotion, and compensation decisions are transparent and well-documented.
3. Train hiring managers and HR personnel on legally compliant practices and the practices that support your business objectives.
4. Communicate diversity initiatives to emphasize workplace culture, professional development, and inclusive merit-based access to opportunities as sustainable business practices.

Federal Minimum Wage

- Trump has been unclear about raising the federal minimum wage
  - opposed increasing it in his first term as harmful to small businesses
  - opposed to increasing it in 2020 election
  - his 2024 campaign website says he supports raising the federal minimum wage, but $15 per hour??
  - revoked Biden Executive Order 14026 setting the current federal contractor minimum wage at $17.20 per hour
- Raise in federal minimum wage may be somewhat irrelevant for Missouri employers given that the state minimum wage goes to $15.00/hour on January 1, 2026

Big Beautiful Bill

- Tipped and hourly workers will be able to deduct significant portions of their tip and overtime income from federal taxes, potentially making hospitality and similar jobs more attractive.
- Individuals must earn $150,000 or less in 2025 to be eligible; for couples, the combined income limit is $300,000 (this threshold will be adjusted for inflation in future years)
- Employees must receive OT pay as defined by the Fair Labor Standards Act (FLSA) (pay for hours worked beyond 40 in a workweek at a premium rate), and the deduction only applies to the *premium portion* of OT pay (the amount above the regular hourly rate)
- The maximum deduction for OT income is $12,500 per year (up to $25,000 if married/jointly)
- These exemptions will only apply from TY2025 to TY2028 and will need to be extended by Congress to continue

Immigration Issues

U.S. Immigration and Customs Enforcement

Recent Immigration and Customs Enforcement (ICE) activity has led to detentions and arrests, raising concerns among immigrant communities.

Current Executive Orders and Recent Actions

- **Mass Deportation Initiatives:**
  - Commencing with plans for large-scale deportations, aiming to remove millions of undocumented individuals from the country.
- **Revocation of Parole:**
  - On June 12th DHS began sending parole termination notices to individuals under the CHNV (Cuba, Haiti, Nicaragua, and Venezuela) parole programs and revoked the parole status of anyone who entered under this program.
  - Any beneficiaries who do not have another status are no longer eligible to work or remain in the U.S.

Current Executive Orders and Recent Actions

- **Revocation of Temporary Protected Status (TPS):**
  - DHS revoked TPS for approximately 600,000 Venezuelans rendering them no longer allowed to live and work legally in the U.S.
  - TPS with a validity date of October 2, 2026, received after February 5, 2025, is no longer valid and those individuals under the 2023 designation no longer have TPS.
- **Previous Safe Zones**
  - Churches and schools were deemed no longer safe zones from ICE activity, thereby making them locations that ICE can target during enforcement activity.
- **Increased H1B Visa Fees**
  - A new policy imposes a one-time $100,000 fee on new H-1B visa petitions filed on or after September 21, 2025, though it does not apply to renewals or current visa holders.

Why Would ICE be at the Worksite?
Raids vs. Audits

ICE may come to the worksite to:

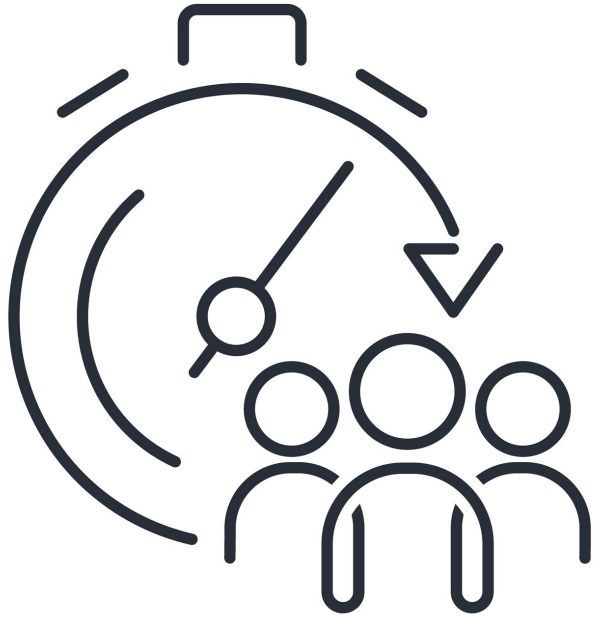
- **Start an I-9 audit** – must have a Notice of Inspection
- **Workplace raid** – must have a Judicial Warrant
- **Enter your facility to detain a specific person** – must have a Judicial Warrant
- **Detain a specific person if that person is located in a public, non-private space** – must have an Administrative Warrant

What Steps Can You Take?

- **Distinguish Public v. Private Areas**
  - Mark off private areas with “Private” signs
  - Keep doors closed or locked
  - Have a policy that visitors and public cannot enter particular areas without permission
- **If ICE arrives:**
  - Request identification
  - Ask for scope of visit
  - Obtain copy of warrant or subpoena
- **Train workers to NOT interact with ICE agents**
- **Do NOT help ICE sort people by immigration status or country of origin**
- **If ICE shows you an administrative warrant with an employee’s name on it:**
  - You do NOT have to say if that employee is working on that day
  - You do NOT have to take the ICE agents to the employee
- **Ensure ICE is complying with scope of warrant and voice objections**
- **Record the raid and ask where employees are being taken (if taken)**

Fisher Phillips Rapid Response Team

- Immediate Legal Counsel
- Employee Representation
- Documentation and Compliance Review
- Post-Raid Support and Strategy



24/7 Emergency Hotline – (877) 483-7781

DHSRaid@fisherphillips.com

ICE I-9 Audits

- An I-9 audit (Notice of Inspection) may arrive by mail or hand delivered by an ICE officer.
- The company will have 3 days to produce the requested I-9s and other documents.
- Do not waive the 3 days – take the time to prepare the submission with legal counsel.
- Extensions may be requested though are not often given for more than a few dys.
- Arrange with requesting officer where to produce the documents – either onsite at the workplace, via hand delivery to the officer or electronic submission.
- If onsite inspection is required, provide the officer a place to review the documents that is separate from major areas of operations or other documents / items that could lead to further investigations.

Department of Labor (DOL) Updates

Trump DOL Agenda: Key Focus Areas

- DOL plans to address joint employer and classification requirements
- Roadmap posted and then taken down, offering early look at agenda
- Trump has ordered agencies to cut 10 regulations for every one that they create
- DOL's Wage and Hour Division will reconsider FLSA regulations:
  - Joint employer liability for minimum wage and OT violations
  - Independent contractor v. employee

Lori Chavez-DeRemer – Secretary of Labor

- Sworn in on March 11th
- Publicly supported as nominee by Teamsters President Sean O'Brien
- One of three Republican co-sponsors of the PRO Act
- Stated focus is on expanding workforce training, bringing back manufacturing jobs, and ensuring American workers are skilled and protected.
- ***Pro-business? Pro-labor?***
  Somewhere in between?

DOL Reboots Opinion Letter Program

On June 2, the Department of Labor (DOL) announced its expansion of the opinion letter program allowing employers to request opinion letters from five of its key enforcement arms:

- Wage and Hour Division (WHD)
- Occupational Safety and Health Administration (OSHA)
- Employee Benefits Security Administration (EBSA)
- Veterans' Employment and Training Service (VETS)
- Mine Safety and Health Administration (MSHA) (which will operate through its own platform)

What Are Opinion Letters?

Opinion letters are formal, written guidance from DOL officials explaining to the public how the agency would apply the law to a specific set of facts.

They serve several key purposes:

- **Solid guidance:** Employers can feel more confident applying the DOL's opinion to the real-world workplace scenario in question. While they don't offer you a 100% shield from an adverse court ruling, they do provide a basis for an employer to demonstrate their application of the standard was consistent with the agency's own published interpretation.
- **Transparency and consistency:** Published letters allow others to potentially benefit from the agency's interpretation, even if they didn't submit the request.
- **Legal safe harbor:** Reliance on opinion letters can sometimes serve as a "good faith" defense under laws like the Fair Labor Standards Act (FLSA) – but they aren't get-out-of-jail-free cards, so you'll want to work with your legal counsel to understand their reach.

What Might Change: Independent Contractor Rule

Prior DOL Rule adopted January 2021:

- Five-factor test for Independent Contractor status
  - *The nature and degree of the individual's control over the work;*
  - *The individual's opportunity for profit or loss;*
  - The amount of skill required for the work;
  - The degree of permanence of the working relationship; and
  - Whether the work is part of an integrated unit of production.
- Emphasis on first two factors as most important

EEOC

U.S. Equal Employment Opportunity Commission

EEOC Statistics – FY 2024

- 88,531 charges filed (up nearly 10% from 2023)
- 42,301 for retaliation (47.8% of all Charges filed)
- Categories of alleged discrimination
  - Disability – 38.0%
  - Race – 34%
  - Sex – 30%
  - Religion – 4% (dramatic decrease from 2022)
  - Age – 18%

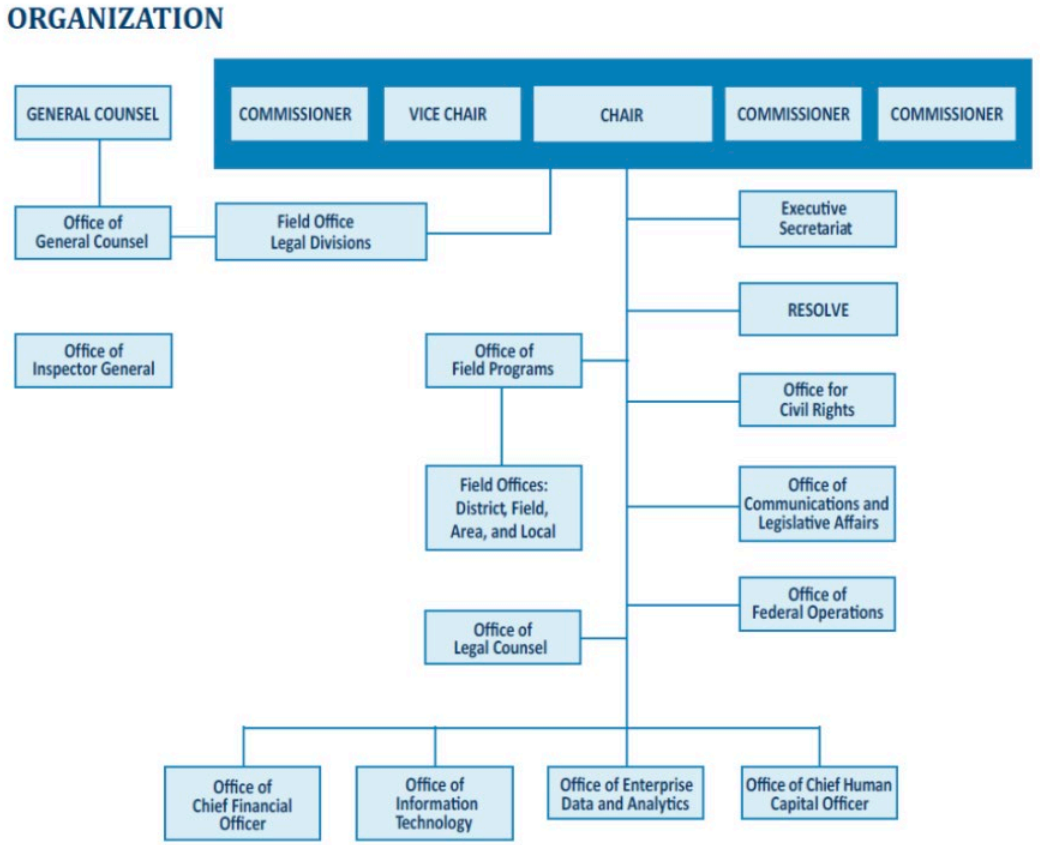
EEOC – Before January 21, 2025

Five members appointed by the President and confirmed by the Senate to 5-year staggered terms:

- Charlotte A. Burrows, Chair – Democratic appointee (7/28)
- Jocelyn Samuels, Vice Chair – Democratic appointee (7/26)
- Andrea R. Lucas, Commissioner – Republican appointee (7/26)
- Kalpana Kotagal, Commissioner – Democratic appointee (7/27)
- Vacant Commissioner

General Counsel appointed by the President and confirmed by the Senate to 4-year term:

- Karla Gilbride (10/27)



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Acting Chair Andrea Lucas

- President Trump named Andrea Lucas acting chair of the EEOC shortly after his inauguration
- Appointed during first Trump administration
- Recently confirmed to a second 5-year term
- Outpaced the agency's other members in filing commissioner charges
- Has withdrawn EEOC support for transgender rights cases and questioned corporate DEI policies
- Pledged to revisit EEOC interpretation of PWFA to exclude eligible medical conditions

No EEOC Quorum… What Does That Mean?

The EEOC needs a quorum of 3 commissioners to take official actions:

- Issuing new regulations,
- Approving litigation (like authorizing a lawsuit against an employer),
- Adopting formal policy statements, guidance, or interpretations of the law.

Without a quorum:

- No new lawsuits can be filed by the EEOC in court.
- No new rules or formal policy changes can be adopted.
- The EEOC can still perform basic functions — like investigating charges, conducting mediations, and processing administrative matters — but it operates at a limited capacity.

Takeaways

Good employment practices will protect you regardless of which political party is in power

- have clear and known work rules
- keep your work rules updated
- train your supervisors and managers
- apply your work rules consistently and fairly (key)
- give the employee a chance to tell their side of the story before acting
  - don’t be afraid to recognize you were wrong
- understand how your decisions will look to the EEOC, judge, or jury

Federal Legislative Update

Pregnant Workers Fairness Act (PWFA)

Effective June 2023 – It Prohibits:

- Failing to make reasonable accommodations to known limitations of qualified employees unless the accommodation would impose an undue hardship on an entity's business operation;
- Requiring a qualified employee affected by such condition to accept an accommodation other than any reasonable accommodation arrived at through an interactive process;
- Denying employment opportunities based on the need of the entity to make such reasonable accommodations to a qualified employee;
- Requiring such employees to take paid or unpaid leave if another reasonable accommodation can be provided; and
- Taking adverse action in terms, conditions, or privileges of employment against a qualified employee requesting or using such reasonable accommodations.

EEOC Regulations – Final Rule

Released April 15, 2024 – Effective June 18, 2024

Required accommodations for elective abortion rescinded May 2025

1. Broad definition of what is considered "pregnancy, childbirth or related medical conditions includes:
    a. Current, past, and potential pregnancy;
    b. Infertility and fertility treatment;
    c. The use of contraception;
    d. Termination of pregnancy – miscarriage, still birth, or abortion;
    e. Pregnancy-related sicknesses – nausea, edema, preeclampsia, carpal tunnel, etc.
    f. Lactation and related issues; and
    g. Menstruation.

EEOC Regulations – Final Rule (cont.)

2. Employees qualify for protection even if their inability to perform essential job duties is temporary and can be performed in the near future
3. "Limitations" don't have to be very limiting and include preventative care and routing medical appointments
4. List of possible accommodations are included in the rule, and include:
    a. Temporarily suspending one or more essential functions; and
    b. Adjusting or modifying workplace policies.
5. Corroborating documents is allowed if there is a reasonable concerns about whether the condition or limitation is "related to, affected by, or arising out of pregnancy, childbirth, or related medical conditions"
6. Can only deny a request if it would create an undue hardship

EEOC Begins Enforcement – September 2024

EEOC v. Wabash National Corporation, U.S. District Court for the W.D. Kentucky

- Manufacturing company denied pregnant employee's request to transfer to a role that did not require lying on her stomach. Instead, forced her to take unpaid leave.
- When leave time expired, employee resigned rather than return to same position without modification at eight months pregnant.

EEOC v. Polaris Industries, Inc., U.S. District Court for the N.D. Alabama

- Manufacturing company refused to excuse employee's absences for pregnancy-related medical appointments and required her to work overtime in violation of doctor's restriction from working over 40 hours per week during her pregnancy.
- Received points under the company's no-fault attendance policy and resigned to avoid termination and to protect her pregnancy.

EEOC v. Urologic Specialists of Oklahoma, Inc., U.S. District Court for the N.D. Oklahoma

- Medical practice would not allow pregnant medical assistant to sit, take breaks, or work part-time at the direction of her treating physician. Instead, forced her to take unpaid leave.
- Employee refused to return to work absent guarantee she would be permitted lactation breaks as needed and was fired for refusing to return to work.

State Legislative Update

Kansas Municipal Employee Whistleblower Act

HB 2160 – Effective July 1, 2025:

- Provides whistleblower protections to municipal employees who report unlawful or unauthorized conduct committed by a municipality or its officers.
- It protects employees from disciplinary action for engaging in any of the following :
  - Discussing matters of public concern with any member of the governing body of such municipality or any auditing agency.
  - Reporting violations of federal, state or local laws, regulations, or rules to any person.
  - Failing to give notice to a supervisor or appointing authority prior to reporting a violation of law.
  - Disclosing unlawful conduct or misappropriation of money by any member, officer or employee to any person.
- Defines disciplinary action as any dismissal, demotion, transfer, reassignment, suspension, reprimand, warning of possible dismissal or withholding of work.
- By no later than July 1, 2025, each municipality must have posted a copy of the Act in a place where it can reasonably be expected to be seen by employees.

Kansas Restraint of Trade Act (Amend)

SB 241 – Effective July 1, 2025:

- Makes certain agreements not to solicit customers or employees "conclusively presumed" to be enforceable, even if they conflict with federal court decisions. It does not apply to noncompete agreements specifically.
  - **Employee non-solicitation of employees** – employee agrees not to solicit employees or owners of the business. The agreement must either: (1) seek to protect confidential or trade secret business information or customer or supplier relationships, goodwill or loyalty OR (2) not last for more than two years after relationship ends.
  - **Employee non-solicitation of customers** – employee agrees not to solicit or interfere with "material contact customers" for up to two years after relationship ends.
- Also adds that "[i]f a covenant that is not presumed to be enforceable … is determined to be overbroad or otherwise not reasonably necessary to protect a business interest of the business entity seeking enforcement of the covenant" courts must "modify the covenant" and "enforce the covenant as modified," granting "only the relief reasonably necessary to protect such interests."
- Will still allow employees to "assert any applicable defense available at law or in equity" in a court's consideration of a written covenant.

SCOTUS Update

E.M.D. Sales V. Carrera, 145 S.Ct. 34 (January 15, 2025)

What happened?

- Employees of grocery distribution company claimed they were misclassified under the outside sales exemption and were due overtime pay. The employer had the burden of proving why the default status of non-exempt did not apply.
- 4th Circuit found for the employees by applying the "clear and convincing" standard that the employer was correct – which translates to an 80%-90% chance.
- This added to an existing Circuit split, in which the 10th Circuit and others used a "preponderance of the evidence" standard – which translates to a 51% chance the employer is correct.
- SCOTUS reversed in a unanimous opinion – finding the "preponderance of the evidence" standard applies when an employer needs to prove it correctly classified employees as exempt from the minimum wage and overtime pay requirements under the Fair Labor Standards Act.

How does it affect employers?

- This ruling will reduce litigation risks by making it easier for employers to show that they have properly classified employees for FLSA purposes.

Ames v. Ohio Department of Youth Services, 145 S.Ct. 1540 (June 5, 2025)

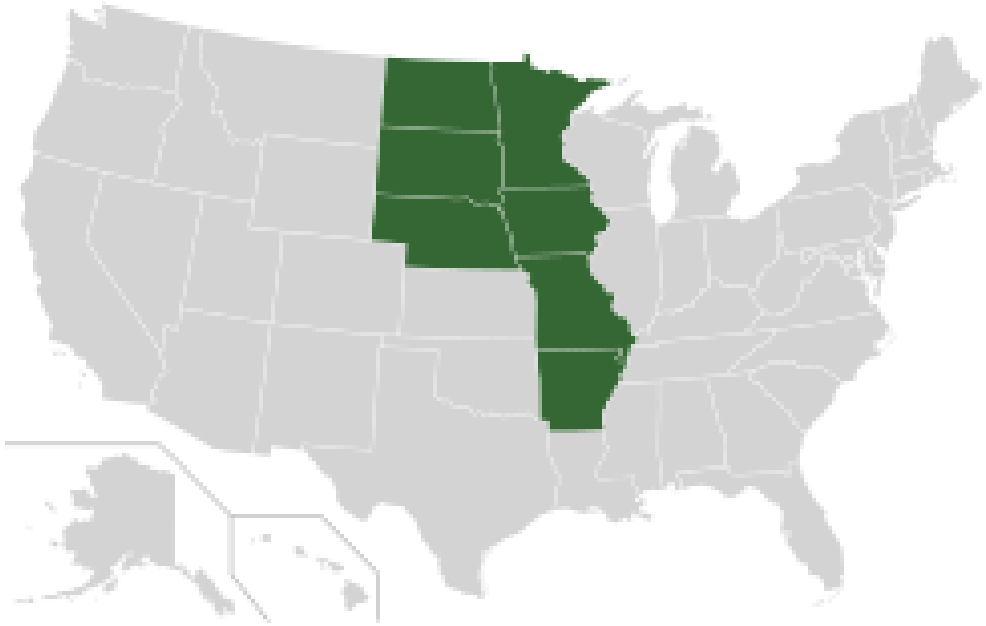
What happened?

- Heterosexual female state employee brought Title VII reverse discrimination claims against employer based on sexual-orientation discrimination, alleging that she was denied promotion in favor of lesbian woman and was demoted in favor of a gay man.
- S.D. Ohio and 6th Circuit found for the employer because Ames had failed to meet her prima facie burden because she had not shown "background circumstances to support the suspicion that the defendant is that unusual employer who discriminates against the majority."
- SCOTUS reversed in a unanimous opinion – Justice Ketanji Brown Jackson held that majority-group plaintiffs are not required to meet heightened evidentiary standard of showing "background circumstances" to establish prima facie case

How does it affect employers?

- The same standard applies to discrimination claims – whether you are the majority, or the perceived minority protected class. Effectively nullifies the historical concept of "reverse discrimination" consistent with EEOC guidance.

8th Circuit Update



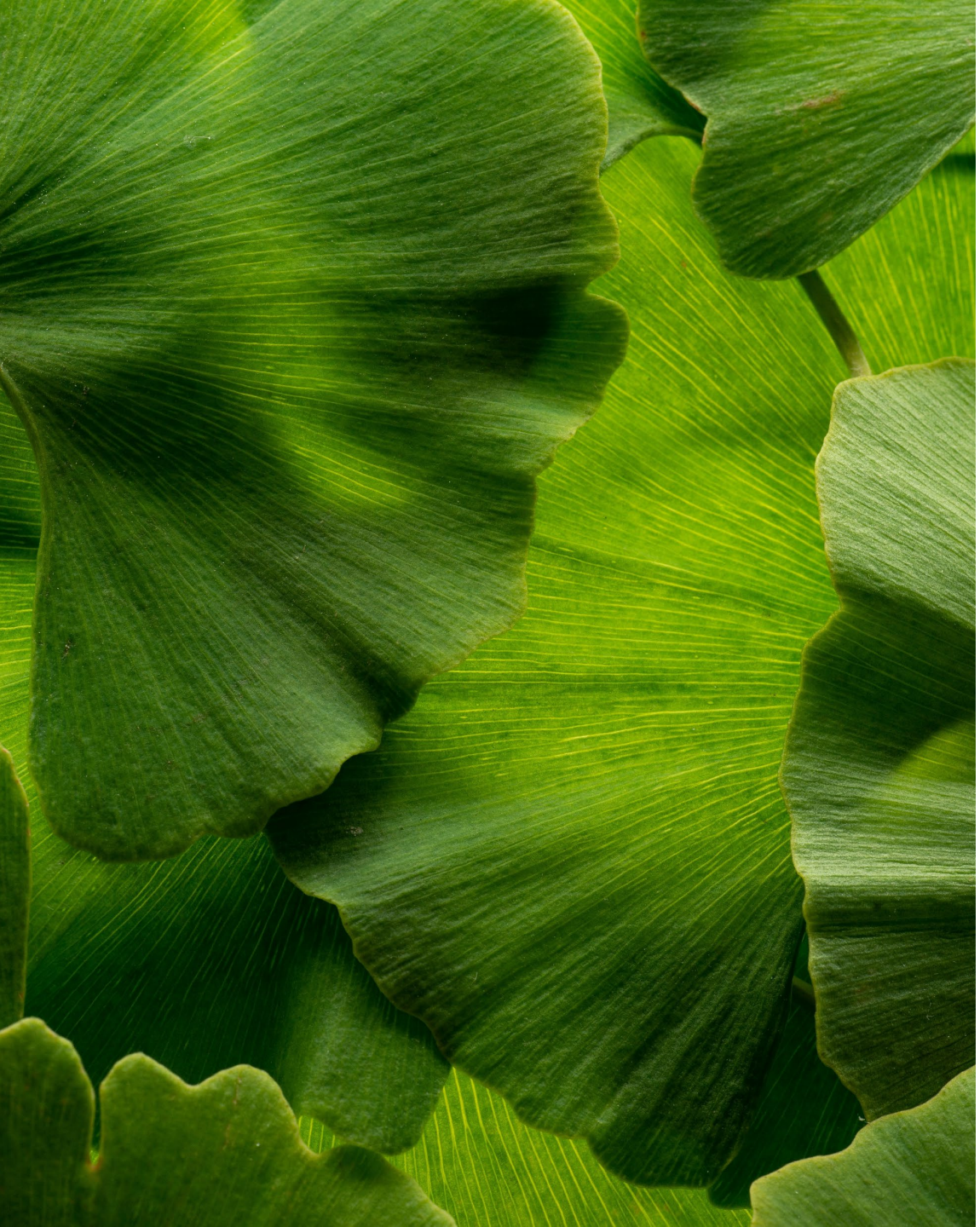
Morris v. VA
119 F.4th 536 (8th Cir. October 10, 2024)

What happened?

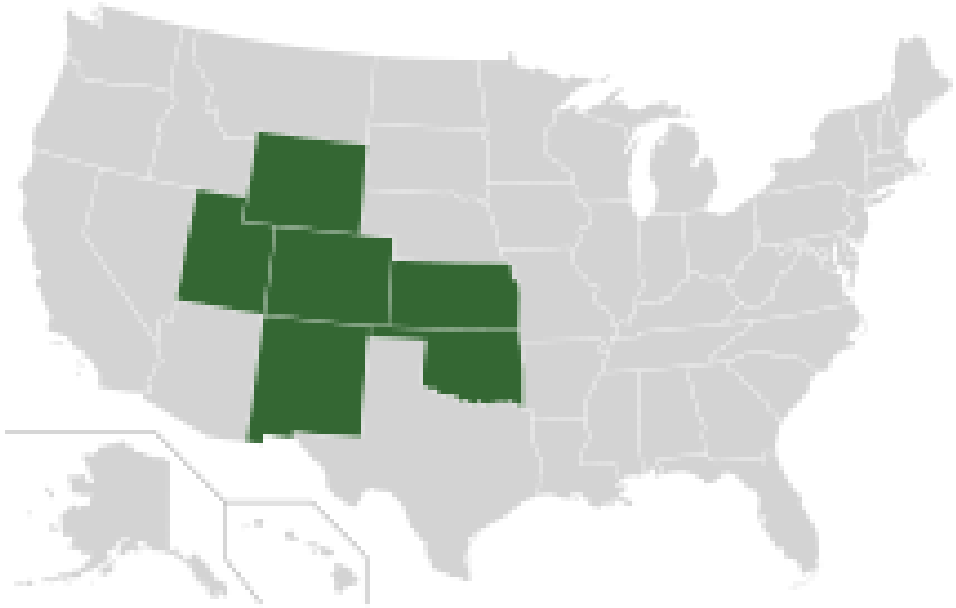
- Employee was denied promotion based on information from references. She brought action alleging federal healthcare facility denied her promotion because of her race and declined to raise her pay in retaliation for her filing discrimination complaints, all in violation of Title VII.
- District court granted summary judgment for employer and 8th Circuit affirmed, finding:
  - selection of white woman who did not have veteran preference, rather than Black woman who did have veteran preference, because she had more favorable references was not pretext for race discrimination
  - failure to approve supervisor's request for pay upgrade on employee's behalf was not in retaliation for her past discrimination complaints where decisionmaker on pay decision was not involved in the complaints.

What does it mean?

- The importance of articulable reasons for personnel decisions and keeping the circle of folks in-the-know small cannot be understated!



10th Circuit Update



Iweha v. State of Kansas
121 F.4th 1208 (10th Cir. Nov 19, 2024)

What happened?

- Former Nigerian staff pharmacist at state hospital was terminated for performance issues. She brought an action alleging hostile work environment, disparate treatment discrimination, and retaliation, in violation of Title VII, and race- and national origin-based discrimination, in violation of § 1981 based on comments made to her:
  - Coworker asked Iweha where she went to school, and when she replied that she had obtained her degree from a pharmacy school in Nigeria, he asked her if there were pharmacy schools in Nigeria. The same coworker also asked Ms. Iweha if Nigeria had a currency or cars.
  - Coworker remarked that "Nigerian women do not go to school. The few who do get educated are bossy."
  - Coworker brought into the pharmacy a set of beads that he believed were used in the slave trade, showed the beads to Iweha, and told her that they were "slave trade beads" and that they reflected her "heritage,"
- District court found conduct was not "severe or pervasive" enough for a HWE claim and that termination was supported by documented misconduct. Tenth Circuit affirmed, finding there must be a "steady barrage of . . . Opprobrious comments" to establish HWE.

What does it mean?

- Still great to be a Kansas employer!

Raymond v. Spirit Aerosystems Holdings, Inc., 2025 WL 39997 (10th Cir. Jan 7, 2025)

What happened?

- Spirit used a tiered performance evaluation system – 15/70/15 – which was then used as a factor in a subsequent retention exercise for a 10% RIF along with the subjective factors of "versatility" and "criticality." The company also "softened" the importance of tenure, and it was no longer a factor.
- Terminated employees brought collective action under the ADEA for age discrimination, and trial court granted summary judgment to Spirit.
- Tenth Circuit affirmed, finding there was no evidence of a pattern and practice of ageism, and failure to rehire was not evidence of ageism given Spirit had selected them for termination based on "poor performance, inferior versatility, and lack of criticality."

What does it mean?

- When conducting a RIF, it is essential to be able to articulate a factor-based process that was used to evaluate candidates for the RIF and a basis for termination selections.

Scheer v. Sisters of Charity of Leavenworth Health Systems, Inc., 144 F.4th 1212 (10th Cir. July 21, 2025)

What happened?

- Over her first 4 years of employment, Scheer received 7 corrective actions for failure to hit productivity targets and was counseled for behavior issues. One day before being placed on a PIP, Scheer expressed suicidal ideations to supervisor. HR Director then revised the PIP to include mandatory referral to EAP.
- Employee initially agreed to the PIP, but she then consulted with an attorney and refused to sign the EAP referral form. She was terminated.
- Sheer sued for perceived disability discrimination, and District of Kansas granted SJ, finding mandatory referral to EAP was not an adverse employment action – and she was terminated for refusing to comply with the PIP.
- Tenth Circuit remanded following *Muldrow* decision with instructions for District Court to reevaluate claims under that new standard of "some harm."

What does it mean?

- Be careful about making your own mental health diagnoses – or any other assumptions about mental or physical abilities – in personnel documents.

Pending Changes to Watch

Predictions – Just Guessing!

1. Artificial Intelligence
   - **AI Accountability and Personal Data Protection Act (Proposed 2025):** restricts AI companies from training models on copyrighted material without permission
   - Continuing state level legislation to address AI bias and other issues
2. Pay Equity
   - More local and state laws requiring employers to disclose salary in job postings or earlier in the hiring/promotion process
3. Paid Sick Leave
   - Most likely will remain a state issue
4. Minimum Wage
   - Still a hot topic – Raise the Wage Act of 2025 introduced in both House and Senate
5. Legalization of Marijuana in Kansas
   - Seems like Governor Kelly has more important issues to tackle

We are Here to Help

QUESTIONS?

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