The Human Resource Consulting Group

We Care for the People who Care for Your Clients

COMPLIANCE UPDATES & RESOURCES

SEPTEMBER 2026 • INCLUDING CHANGES THROUGH OCTOBER 2027

Dear Reader,

The following is a summary of federal, state, and local employment-law developments that may affect your employee handbook, required postings, hiring practices, and payroll. This edition covers changes already in effect, those arriving this fall, and several with 2027 deadlines, so you have time to plan.

The biggest items this cycle are Connecticut's wave of October 1 changes, new Form I-9 inspection notice rules in Massachusetts and Washington, voting-leave readiness ahead of Election Day, and minimum wage increases in Florida (September 30) and across many jurisdictions in 2027.

Not every update applies to every organization. Many of these updates call for handbook revisions, new postings, employee notices, or state-specific addenda. Let our HR experts handle it for you; Contact us, and we'll review your handbook, draft the addenda and notices, brief your team, and keep you compliant and audit-ready.

AT A GLANCE — UPDATES HAPPENING THIS MONTH

NEW POSTINGS & NOTICES	All States (Voting Leave), Connecticut, Florida, Georgia, Maryland, Massachusetts, New York, Washington
HANDBOOK & POLICY CHANGES	Arizona, Colorado, Connecticut, Maryland, New York, Oklahoma, South Carolina
UPDATED HIRING & TECHNOLOGY REGULATIONS	Connecticut, California (San Francisco)
NEW PAYROLL & WAGE REQUIREMENTS	Florida, Connecticut

COMPLIANCE CALENDAR — PLAN AHEAD

Key dates covered in this edition, in order. Items marked **Plan ahead** have longer runways, but vendor reviews, policy drafting, and notice distribution take time — starting now avoids a last-minute scramble.

Effective	Jurisdiction	What changes	Status
Jun 3, 2026	Colorado	Limits on handling employee ID documents	IN EFFECT
Aug 5, 2026	Massachusetts	48-hour notice of Form I-9 inspections	IN EFFECT
Aug 9, 2026	Georgia	Electronic UI separation notices and remote postings	IN EFFECT
Aug 10, 2026	San Francisco, CA	Fair Chance Ordinance expansion	IN EFFECT
Sep 12, 2026	Arizona	Military leave covers all training categories	IN EFFECT
Sep 18, 2026	New York	Hospital emergency department security	NOW
Sep 30, 2026	Florida	Minimum wage rises to $15.00 ($11.98 tipped)	NOW
Oct 1, 2026	Connecticut	Pay transparency, lactation, stay-or-pay, monitoring, cannabis, and more	UPCOMING
Oct 1, 2026	Maryland	Captive audience ban; expanded veterans' preference	UPCOMING
Oct 1, 2026	South Carolina	Civil Air Patrol leave	UPCOMING
Oct 1, 2026	Washington	Form I-9 inspection notices and postings	UPCOMING
Nov 1, 2026	Oklahoma	Drug testing and medical cannabis changes	UPCOMING
Nov 3, 2026	Multiple states	Election Day — voting leave and postings	UPCOMING
Nov 8, 2026	New York	Personnel records access rights	UPCOMING
Jan 1, 2027	Multiple	2027 minimum wages; NY construction PFL; NY hospital annual assessments	PLAN AHEAD
Jan 29, 2027	Connecticut	Accommodation-rights notice to existing employees	PLAN AHEAD
Sep 18, 2027	New York	Hospital and nursing home violence prevention programs	PLAN AHEAD
Oct 1, 2027	Connecticut	AI (AEDT) employment-decision disclosures	PLAN AHEAD

FEDERAL COMPLIANCE UPDATES

Upcoming Voting Leave Compliance Obligations

Federal | **Election Day: November 3, 2026**

Election Day is approaching, so now is a good time to review voting-leave laws and confirm you are posting any mandatory notices.

Voting leave. Most states require employers to provide time off to vote. The amount of time varies by state, and in some states it must be paid. These laws often require very little advance notice from employees, so be prepared to grant time off on short notice.

Early voting. In states with early voting, you may want to encourage employees to use that option by offering the same time-off benefit, to reduce Election Day absences. Depending on state law, however, early voting or absentee ballots may not change an employee's right to time off to vote on Election Day.

Postings. Some states (e.g., California, DC, and New York) require employers to post a notice of employees' voting rights in a conspicuous workplace location in the months or days before an election.

For more information. See the State Voting Leave Chart and the "[State] Voting Leave" pages on the platform, plus the guide Managing Political Conversations and Supporting Employee Voting Rights.

STATE & LOCAL COMPLIANCE UPDATES

Arizona: Military Leave Protections Expanded

Arizona | HB 2663 | Effective September 12, 2026

Arizona has broadened its military leave law for employers of all sizes. Protections that previously covered only specific types of training — such as camps, maneuvers, formations, and armory drills — now extend to all categories of military training for members of the reserve components of the U.S. Armed Forces and any state's National Guard. The bill was signed June 4, 2026.

✔ **ACTION ITEMS**
Review your military leave policy to confirm leave is available for all qualifying training obligations and update any language that lists only specific types of training.

California: San Francisco Fair Chance Ordinance Expanded

San Francisco, CA | Ordinance 260540 | Effective August 10, 2026

San Francisco has expanded its Fair Chance Ordinance, further restricting how employers with five or more employees that are located or doing business in the city may use criminal history in employment decisions. The ordinance was enacted July 10, 2026.

Protected out-of-state conduct. Employers may not consider out-of-state convictions — including unresolved arrests — for conduct that is lawful in California, such as abortion-related health care, public drag performances, and gender-affirming care.

Individualized assessments. When deciding whether criminal history is directly related to the position, employers must weigh the nature and gravity of the offense.

Adverse action procedures. Employers must send a notice acknowledging receipt whenever an applicant or employee submits evidence of rehabilitation, mitigating information, or a dispute about the accuracy of criminal history records. Employers generally have 30 days after the individualized assessment process to issue a final adverse action decision.

✔ **ACTION ITEMS**
Update background-screening procedures, adverse action workflows, and criminal-history decision-making guidance for San Francisco positions.

Colorado: Limits on Handling Employee Identification Documents

Colorado | HB26-1283 | Effective June 3, 2026

Key takeaways. Employers and their agents generally may not demand, confiscate, retain, or otherwise require an applicant or employee to surrender their government-issued identification card. Employers must also provide notice and obtain acknowledgment from applicants and employees as part of the employment-eligibility-verification process.

What it means for employers. Employers may request and temporarily retain documents to verify work authorization and may make copies where permitted by law, but originals must be returned promptly and may not be kept for more than 10 hours. Written notice must be provided in the individual's primary language, and the signed acknowledgment must be kept in the personnel record.

Penalties. A knowing violation may carry criminal penalties — generally criminal possession of an identification document, a class 2 misdemeanor. Certain conduct may be treated as a bias-motivated crime (a class 1 misdemeanor) when done to intimidate or harass someone based on a protected characteristic.

Exceptions. Retention is allowed where required or permitted by federal or state law (including to verify employment eligibility), or under a judicial warrant.

✔ **ACTION ITEMS**
Review how ID documents are handled during onboarding and I-9 verification, and confirm your procedures with counsel.

Connecticut: Employment Law Changes Effective October 1, 2026

Connecticut | HB 5003 · SB 472 · HB 5350 | Effective October 1, 2026

Several Connecticut changes take effect October 1, 2026, touching job postings, handbook language, standalone notices, payroll, and onboarding. HB 5003 was signed May 11, HB 5350 on May 20, and SB 472 on June 4, 2026.

Pay transparency. Job postings, including internal postings, must include a pay rate or range and a general description of benefits, and employers must provide pay and benefits disclosures to applicants and employees when required. If no compliant posting was available, share pay and benefits information before compensation discussions.

Lactation accommodation. Employers must provide reasonable break time to express breast milk or breastfeed in addition to scheduled breaks.

Reasonable accommodation notice. Employers must give written notice of employees' ADA reasonable-accommodation rights to existing employees by January 29, 2027, to new hires upon hire, and to employees who disclose a disability within 10 days. Posting the state-issued notice may satisfy the requirement; watch for the state poster or guidance.

Wage statement pay code guide (100+ employees). Employers must create and maintain a guide explaining overtime and commonly used pay differential codes, post or provide it in the required languages, and include dispute-contact information. Add the website address or written guide to new-hire and wage statement processes.

"Stay or pay" prohibition. The prohibition now applies to all employers for agreements signed on or after October 1, 2026. Review repayment, training-cost, and similar agreements, and update templates before using them.

Electronic monitoring. Employers that electronically monitor employees must give new hires a written statement before their first day and update notices or postings to identify where monitoring occurs, unless monitoring is for security or employee safety.

Medical cannabis. Employers may not refuse to hire, or take or threaten adverse action, based on someone's status as a qualifying out-of-state medical cannabis patient or caregiver, subject to limited federal-law and funding exceptions. Rules against use or impairment during work hours may remain in place.

✔ **ACTION ITEMS**
Update job posting templates, pay and benefits disclosure workflows, lactation language, ADA accommodation notices, pay code guide processes, stay-or-pay agreements, monitoring notices and onboarding statements, and medical cannabis guidance as applicable.

Connecticut: Disclosures Required for AI in Employment Decisions

Connecticut | SB 5 | Effective October 1, 2027

Beginning October 1, 2027, Connecticut employers of all sizes that do business in the state must provide plain-language disclosures when they use automated employment-related decision technology (AEDT) to make employment decisions about Connecticut applicants or employees. SB 5 was signed May 27, 2026 — the lead time is an opportunity to get vendors and processes ready.

Covered decisions. Written disclosure is required before using AEDT for decisions such as hiring, promotion, discipline, termination, or rehire based on applicant or employee personal data.

Required content. Disclosures must explain that AEDT is used; identify the technology's trade name and purpose; describe the decision it will make; list the categories and sources of personal data used and how they are assessed; and provide employer contact information.

AI interactions. Employers that use AEDT to interact with applicants or employees — for example, chatbots or screening and scheduling tools — must tell them they are interacting with the technology, unless that would be obvious to a reasonable person.

Withheld information. Employers need not disclose trade secrets or information protected by state or federal law, but must tell the individual what is being withheld and why.

Vendor support. AEDT developers are expected to give employers the information needed for disclosures and, in some cases, may provide disclosures directly to applicants or employees.

> ✔ **ACTION ITEMS**
> Inventory AI tools used in Connecticut employment decisions or interactions, confirm with vendors that they can supply the required disclosure details, prepare plain-language disclosures, and build disclosure timing into hiring, onboarding, and employment-decision workflows.

Georgia: Unemployment Insurance Separation Notice and Posting Updates

Georgia | Amended rules adopted July 20, 2026 | Effective August 9, 2026

Georgia has updated its unemployment insurance rules on electronic delivery of separation notices and electronic workplace postings for remote workers.

Electronic separation notices. Employers that deliver separation notices electronically must send them by email, an employee portal, or a similar system; keep delivery records; use compliant electronic signatures; and retain proof of delivery for at least four years.

Postings for remote employees. Employers with remote workers may satisfy certain posting obligations electronically if specific access and recordkeeping requirements are met.

> ✔ **ACTION ITEMS**
> Review how separation notices are distributed, confirm your proof-of-delivery process, and check that postings for remote employees meet the revised rules.

Maryland: Captive Audience and Veterans' Preference Laws

Maryland | SB 417 · HB 721/SB 243 | Effective October 1, 2026

Captive audience meetings. Employers may not take — or threaten — adverse action against an employee or applicant for declining to attend an employer-sponsored meeting, or to listen to communications, conveying the employer's views on political or religious matters. Political matters include elections, political parties, proposals to change laws or public policy, and decisions to join or support political, civic, community, fraternal, or labor

organizations. Religious matters include religious belief, affiliation, or practice, and decisions to join or support religious organizations.

Exceptions. Limited exceptions apply, including certain legally required communications and job-related trainings or communications.

Notices and postings. Provide notice to each employee upon hire and post it where employee notices are customarily displayed. The state model notice is expected by November 1, 2026.

Veterans' preference expanded. Employers may now extend hiring and promotion preferences to veterans with any discharge status except dishonorable (previously limited to honorably discharged veterans).

> ✔ **ACTION ITEMS**
> Update handbook language, train supervisors, distribute the hire notice and post it once the state issues it, and revise any veterans' preference policy.

Massachusetts: Notice of Form I-9 Inspections Required

Massachusetts | H 5620 | Effective August 5, 2026

Employers of all sizes must give written notice to employees within 48 hours of receiving a federal immigration inspection notice for Form I-9 or other employment records. The law took effect when signed on August 5, 2026.

The law does not specify the notice's content or delivery method. Consider including the date the notice was received, the records requested, and when the inspection is expected, delivered through your usual employee communication method (e.g., email or hand delivery).

> ✔ **ACTION ITEMS**
> Create an inspection response procedure and template employee notice now, and keep documentation showing each notice went out within 48 hours.

New York: Workplace Violence Prevention for Hospitals and Nursing Homes

New York | S5294B | Phased in September 18, 2026 – September 18, 2027

Signed December 12, 2025, this law sets new workplace violence prevention requirements for certain New York hospitals and nursing homes.

Emergency department security (Sept. 18, 2026). Hospitals must have an off-duty law enforcement officer or trained security personnel on site for emergency department security. Location requirements depend on whether the city or county has at least 1 million residents, and some hospitals may qualify for an exemption.

Annual assessment and plan (Jan. 1, 2027). Hospitals must conduct annual workplace safety and security assessments and involve employees in both the assessment and plan development, addressing risks through measures such as training, security procedures, and safety equipment.

Prevention programs (Sept. 18, 2027). Hospitals must establish a program that conforms to applicable Medicare and Medicaid regulations and accrediting standards. Nursing homes must also establish a program; compliance with certain existing federal regulations may satisfy the requirement if assessments and plans address workplace violence.

> ✔ **ACTION ITEMS**
> Confirm which facilities are covered, update workplace violence prevention policies, plan the required assessments and employee involvement, and implement required security measures.

New York: Personnel Records Access Law

New York | S3460 | Effective November 8, 2026

Signed September 9, 2026, this law gives current and former public- and private-sector employees expanded rights to view, copy, and dispute their personnel files.

Key employee rights. Employees may request a free copy of their personnel record up to twice per calendar year and must receive it within five business days of a written request. They must be notified within 10 days when negative information affecting their job, pay, promotion, or discipline is added (a review prompted by new negative information does not count toward the twice-per-year limit). Employees may also submit a written rebuttal that stays permanently attached to the file and is shared whenever the disputed record goes to a third party.

Employer requirements. Employers must keep complete personnel records during employment and for three years after separation. The Attorney General may impose civil fines of $500 to $2,500 per violation, and retaliation is prohibited.

> ✔ **ACTION ITEMS**
> Set up a request-tracking process that meets the five-business-day deadline, a procedure for notifying employees of negative entries, and a records retention schedule covering three years after separation.

New York: Paid Family Leave Expanded for Construction Workers

New York | Effective January 1, 2027

New York is extending paid family leave (PFL) to union construction employees who move between multiple employers.

Eligibility. Covers workers under a collective bargaining agreement (CBA) who worked at least 26 of the prior 39 weeks for any employer that signed the CBA. Covered work includes construction, demolition, excavation, repairs, renovations, and improvements, and union and health-plan benefits must remain active during leave.

> ✔ **ACTION ITEMS**
> Review CBAs and multi-employer fund documents during 2026, coordinate with third-party administrators to track weeks worked across job sites, and update payroll for the 2027 contribution rate and maximum weekly benefit ($1,287.91).

Oklahoma: Drug Testing and Medical Cannabis Changes

Oklahoma | HB 3127 | Effective November 1, 2026

Oklahoma's medical cannabis law changes for employers of all sizes. HB 3127 was signed April 17, 2026.

Zero tolerance for safety-sensitive positions. Employers must apply zero-tolerance drug and alcohol standards to applicants for, and employees in, safety-sensitive positions. The law does not define “zero tolerance,” but such policies often require adverse action when someone possesses, uses, tests positive for, or is impaired by a substance at work.

Updated safety-sensitive definition. Positions are evaluated by the high-risk duties listed in the law — such as handling hazardous materials, operating vehicles or machinery, or providing patient or child care. The list is not exhaustive, so similar duties may qualify.

Positive cannabis tests. Employers with a lawful written drug testing policy may take adverse action based solely on a positive cannabis test.

✔ **ACTION ITEMS**
Update drug and alcohol policies, identify safety-sensitive roles, and train HR and managers on when adverse action is permitted.

South Carolina: New Civil Air Patrol Leave

South Carolina | S 1043 | Effective October 1, 2026

Employers of all sizes must provide unpaid, job-protected leave to employees who are Civil Air Patrol members: up to 30 days per calendar year for emergency service operations and up to 10 days per calendar year for training. S 1043 was signed June 30, 2026.

Using leave. Employers may let employees apply leave from one category to the other. Unused leave does not carry over and need not be paid out at termination.

No exhaustion requirement. Employers cannot require employees to use or exhaust other available leave first.

Notice and documentation. Employers may require notice of membership, the need for leave, expected duration and return date, and proof of participation.

Essential employees. Employers may deny leave to employees designated as essential, but should document those designations and grant leave when the absence will not disrupt operations.

✔ **ACTION ITEMS**
Add or update a Civil Air Patrol leave policy and identify any essential employee designations.

Washington: Form I-9 Inspection Notice and Posting Requirements

Washington | HB 2105 | Effective October 1, 2026

Employers of all sizes must notify employees in advance after receiving a federal Form I-9 inspection notice, and notify affected employees individually after results arrive. HB 2105 was signed March 30, 2026.

Notice of upcoming inspection. Within five business days of the federal notice, give each employee written notice with a copy of the federal notice, the date received, the records requested, and the purpose of the inspection, in English and the five most common non-English languages spoken in Washington.

Delivery and posting. Use your primary employee communication method — hand delivery, mail with proof of delivery, or email or text with proof of transmission — and post the notice in a conspicuous workplace location until the inspection is complete.

Notice of results. Within five business days of written results, notify employees whose work authorization documents have deficiencies or indicate lack of authorization. Include the results, employer and employee obligations, the deficiencies, the correction timeframe, meeting time or options, and the right to representation.

Language and privacy. Result notices must be in the language regularly used with the employee and contain only that employee's information. Employers must also post a rights notice in English and the five most common languages spoken in Washington; state model notices and posters are available.

✔ **ACTION ITEMS**
Use the state model notices, build a five-business-day response process, deliver individual notices through approved methods, post required notices during inspections, and redact other employees' information from result notices.

WAGE & HOUR

Florida: Minimum Wage Increases to $15.00

Florida | 2020 voter-approved ballot initiative | Effective September 30, 2026

Florida's minimum wage rises to $15.00 per hour on September 30, 2026, completing the phased increases voters approved on November 3, 2020. The minimum cash wage for tipped employees rises to $11.98 per hour.

✔ **ACTION ITEMS**
Update payroll rates, replace your Florida minimum wage poster, and revise any Florida wage references in your handbook or state addendum by September 30, 2026.

2027 Minimum Wage Increases (State & Local)

Multiple jurisdictions | Effective for 2027 (some rates projected)

Many states and localities adjust their minimum wage each year for inflation, and several 2027 rates are now published or projected. Confirm the exact rate for each location where you employ staff before running your first 2027 payroll.

Statewide	2027 rate / notes
Alaska	$14.00 (as of July 1, 2026); no separate 2027 increase specified
Connecticut	$17.48; tipped — $6.38 (waitstaff), $8.23 (bartenders)
District of Columbia	$18.40 (as of July 1, 2026); no separate 2027 increase specified
Florida	$15.00 (from September 30, 2026, holding for 2027); tipped $11.98
Minnesota	$11.87 (statewide forecast); $9.68 for employees under 20 in their first 90 days
Nebraska	About $15.26–$15.27 (1.75% increase); youth $13.50 (ages 14–15); training $13.70 (certain ages 16–19, first 90 days)
Ohio	$11.40 (projected), up from $11.00; tipped $5.70 (projected); businesses with $419,000+ gross receipts
Oregon	$16.80 (Portland metro), $15.55 (standard), $14.55 (nonurban counties)
Virginia	$13.75 (rising to $15.00 in 2028); farm employees and laborers covered starting January 1, 2027

Local	2027 rate / notes
Albuquerque, NM	$13.00; tipped $7.20
Burien, WA	$21.78 (501+ employees), $20.78 (16–500), $19.28 (15 or fewer) — 2026 rates; 2027 not specified
California localities	2026 rates (2027 not yet specified): San Francisco and Berkeley $19.61; West Hollywood $20.87 (hotel) / $20.25; Emeryville $19.50; Milpitas $18.50; Pasadena $18.57; Los Angeles County $18.47; Santa Monica $18.47; Los Angeles $18.42; Fremont $18.05; Malibu $17.91; Alameda $17.76
Chicago, IL	$17.05; tipped $12.96
Cook County, IL	$15.40; tipped $9.25
Howard County, MD	$16.00 for small employers (as of July 1, 2026); 2027 not specified

Local	2027 rate / notes
Lincoln, NE	$15.00 (from July 18, 2026); CPI-based increases starting in 2027
Minneapolis, MN	Projected to exceed $17.00 in 2027
Montgomery County, MD	$18.00 (51+ employees), $16.50 (11–50), $15.95 (10 or fewer) — as of July 1, 2026; 2027 not specified
Omaha, NE	$15.00 until January 1, 2027, then CPI-based increases; tipped $2.13
Santa Fe, NM	$15.40 (as of March 1, 2026); tipped living wage $3.00
Santa Fe County, NM	$15.40 (as of March 1, 2026); tipped $4.62
St. Paul, MN	$17.02 (100+ employees) from January 1, 2027; $16.37 (6–100) and $14.25 (5 or fewer) until July 1, 2027, then $17.02 and $15.00

Please note. *Many rates adjust annually with inflation or the CPI, so actual 2027 figures may differ from the projections above, and some local ordinances are subject to legal challenge or state preemption. This list is not exhaustive; your HRCG team can confirm the current rate for any location where you employ staff.*

RESOURCES & CONTACTS

The HRCG team monitors federal, state, and local employment-law changes regularly and helps employers turn them into the handbook updates, postings, policies, and employee notices their organization needs. When something in this edition applies to you, we can handle the implementation so you stay compliant and audit-ready.

Ready to put these updates into action?

Contact us today, and we'll help you take care of the details.

The Human Resource Consulting Group, LLC | (203) 881-1755 | HRHelp@HR-Consulting-Group.com

This newsletter is provided for general informational purposes only and is not legal advice. Laws and effective dates change, and some 2027 figures are projected; please consult your HRCG consultant or legal counsel before acting on any item.