



CLIENT UPDATE

Monthly news and developments in employment law and labor relations for California Public Agencies.

JANUARY 2019

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Client Update is published monthly for the benefit of the clients of Liebert Cassidy Whitmore. The information in *Client Update* should not be acted on without professional advice.

Los Angeles | Tel: 310.981.2000
 San Francisco | Tel: 415.512.3000
 Fresno | Tel: 559.256.7800
 San Diego | Tel: 619.481.5900
 Sacramento | Tel: 916.584.7000

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PREVAILING WAGE

Court Adopts Broad Definition of “Public Works” That Are Subject to California’s Prevailing Wage Law.

David Kaanaana and others were former employees (“employees”) of Barrett Business Services, Inc. (“Company”). The Company supplied employees to publicly-owned and operated recycling facilities through contracts with the Los Angeles County Sanitation District. The employees worked at the recycling facilities as belt sorters. Their work consisted of standing at sorting stations placed along a conveyor belt; removing recyclable materials from a conveyor belt; and placing the material into receptacles at their sorting stations.

Kaanaana and other employees sued, claiming that the Company failed to pay them the “prevailing wage” they were owed under California law. They asserted that their recycling sorting duties constituted “public work” under the California Labor Code which states:

“[e]xcept for public works projects of ... (\$1,000) or less, not less than the general prevailing rate of per diem wages for work of a similar character in the locality in which the public work is performed, and not less than the general prevailing rate of per diem wages for holiday and overtime work fixed as provided in this chapter, shall be paid to all workers employed on public works.” (§ 1771.)

This section of the Labor Code applies to work performed under contract with public agencies, but not to work that a public agency performs using its own labor force.

The Court of Appeal agreed with the employees and found that this recycling was “public work” that is subject to prevailing wage law. This was the case even though recycling sorting work is not specifically listed among the categories of public work in the Labor Code.

The Court reviewed the plain language and legislative history of the Labor Code and determined that the definition of “public work” had broadened over time to cover work beyond that associated with construction projects. The purpose of the prevailing wage law had also expanded to protect employees from substandard wages, and to compensate nonpublic employees with

higher wages. The Court of Appeal reversed the judgement that narrowly defined “public works” and remanded the case back to the trial court.

Kaanaana v. Barrett Business Services et al., 240 Cal.Rptr.3d 636 (2018).

NOTE:

LCW attorneys are experienced in prevailing wage issues and regularly assist special districts and other public agencies on these issues.

Personnel Rules that Restricted On-Duty Protected Activity Were Lawful, but Rule that Restricted Off-Duty Activity Was Not.

The Court of Appeal found that a trial court employer, the Superior Court of Fresno County (“employer” or “Court”), was justified in adopting personnel rules that prohibited employees from wearing any insignia at work, or soliciting during work hours, among other things. The represented Court employees included over 300 office assistants, judicial assistants, account clerks, court reporters and marriage and family counselors. The Personnel Rules in question prohibited them from: (1) wearing clothing or adornments with any writings or images, including pins, lanyards and other accessories; (2) soliciting during work hours for any purpose without prior Court approval; and (3) distributing literature during non-work time in working areas, among other things.

Restriction on wearing any writings or images

The Court employer argued that its prohibition on insignia was necessary to preserve the appearance of impartiality of court staff and personnel to people who interact with the judicial branch. The employer also presented evidence showing that the affected employees work in various areas of the court that are visible to the public to some degree, and that the employees regularly move throughout the courthouse to perform their duties.

State and federal laws generally provide public employees the right to wear union buttons and other union paraphernalia at work, except in “special circumstances” that justify a prohibition. To decide whether special circumstances exist, PERB and the courts weight the right of employees to wear union insignia against any legitimate employer interest in prohibiting this activity. The specific details of the employer’s operations, and employee interactions with the public are relevant to the analysis.

The Court of Appeal noted that that the “legitimacy of the Judicial Branch depends on its reputation for impartiality and nonpartisanship,” and this necessarily requires the courts to maintain a neutral appearance. Evidence also showed that court employees regularly interacted with the public and that employees are subject to a code of ethics that requires them to maintain the appearance of impartiality. Therefore, the Superior Court of Fresno had a substantial interest in regulating its workforce to ensure that the judicial process appears impartial. The Court of Appeal found that this justified the broad restrictions on wearing union insignia.

Prohibition on solicitation during working hours for any purpose

Contrary to PERB’s findings, the Court of Appeal found that the Court employer’s ban on soliciting during working hours for any purpose was lawful. The rule prohibited solicitation during “working hours,” and defined “working hours” as “the working time of both the employee doing the soliciting and distributing and the employee to whom the soliciting is being directed.” It was reasonably susceptible to only one interpretation; that employees are prohibited from engaging in solicitation during working time but may engage in solicitation during nonworking time. Thus, that Personnel Rule was lawful.

Prohibition on distribution of literature during nonworking time

The Court of Appeal found the Court employer's Personnel Rule restricting distribution of literature "at any time for any purpose in working areas" was impermissibly ambiguous. The rule did not define the term "working areas." Moreover, mixed-use work and non-work areas existed at the Court, and other Personnel Rules only generally referred to "court property." In this context, a Fresno Superior Court employee could reasonably interpret the rule to mean that distribution was prohibited in mixed-use areas even during an employee's off-duty time, and in non-work areas during the employee's off-duty time. Therefore, this Personnel Rule impermissibly interfered with employee protected rights to distribute literature during non-work time under California's Trial Court Act.

Superior Court of Fresno v. Public Employment Relations Board, __ Cal.Rptr.3d __, 2018 WL 6583386.

NOTE:

Whether "special circumstances" will justify restrictions on the wearing of union insignia must be analyzed on a case-by-case basis because of the wide variety of work settings, and services provided by public agencies. LCW attorneys can analyze your agency's personnel rules and policies, including those that impact protected concerted activities.

RETIREMENT

PEPRA's Forfeiture Provisions Applied to Convicted Employee-Embezzler.

Jon Wilmot was a long-term employee of the Contra Costa County Fire Protection District ("District"), and a member of the retirement program administered by the Contra Costa County Employees' Retirement Association ("CCERA"). Wilmot retired from his position as

Fire Captain. His last day of work was December 12, 2012. He applied for a service retirement to CCERA the following day.

Soon after, on January 1, 2013, the Public Employees' Pension Reform Act ("PEPRA") took effect. One provision of PEPRA, mandated that a public employee must forfeit part or all of the employee's pension if the employee is convicted of "any felony under state or federal law for conduct arising out of or in the performance of his or her official duties." (Gov. Code section 7522.72(b)(1).)

In February 2013, Wilmot was indicted on charges of embezzling County funds (he later pled guilty). In April 2013, the CCERA approved Wilmot's retirement application; his retirement was effective as of December 13, 2012, and Wilmot began receiving pension checks. In December 2015, Wilmot pled guilty to embezzling County funds over a period of about 12 years, from approximately 2000 until December 2012. Wilmot had stolen District property and equipment for several years.

CCERA reduced Wilmot's pension payments in accordance with PEPRA's forfeiture provisions and Wilmot sued CCERA, claiming that PEPRA's forfeiture provision did not apply to him because he "retired" before its effective date, among other things.

The Court of Appeal rejected Wilmot's claim and found that CCERA properly applied PEPRA's forfeiture provisions. PEPRA states:

"A public employee shall forfeit all the retirement benefits earned or accrued from the earliest date of the commission of any felony ... to the forfeiture date, inclusive. The retirement benefits shall remain forfeited notwithstanding any reduction in sentence or expungement of the conviction following the date of the public employee's conviction. Retirement benefits attributable to service performed prior to the date of the first

commission of the felony for which the public employee was convicted shall not be forfeited as a result of this section.”

Moreover, for purposes of applying PEPRA’s forfeiture provisions, Wilmot was retired as of the date the CCERA approved his retirement in April 2013, not on his last date of employment or the date he submitted his retirement application. Thus, PEPRA became effective before Wilmot actually retired, so he was subject to its retirement benefit forfeiture provisions.

Wilmot v. Contra Costa County Employees Retirement Association, ___ Cal.Rptr. ___, 2018 WL 6303969.

CONSORTIUM CALL OF THE MONTH

Members of Liebert Cassidy Whitmore’s employment relations consortiums may speak directly to an LCW attorney free of charge regarding questions that are not related to ongoing legal matters that LCW is handling for the agency, or that do not require in-depth research, document review, or written opinions. Consortium call questions run the gamut of topics, from leaves of absence to employment applications, disciplinary concerns to disability accommodations, labor relations issues and more. This feature describes an interesting consortium call and how the question was answered. We will protect the confidentiality of client communications with LCW attorneys by changing or omitting details.

Issue: An administrator contacted LCW to find out whether the agency must allow an employee to bring her baby to work, for the purposes of breastfeeding. The agency’s policies did not address the issue.

Answer: The attorney noted that California law requires employers to provide employees a reasonable amount of break time and a private location that is not a restroom to express breast

milk for the employee’s infant child, except in certain circumstances. (Labor Code §§ 1030-1033.) State law also provides mothers the right to breast feed a child in a place where the mother and child are otherwise authorized to be present. (Civil Code § 43.3.) But state statutes do not require the employer to allow the employee to bring a child to work. An employer may have an obligation to engage in the interactive process if an employee has a disability that requires breastfeeding, rather than pumping. In that circumstance, the employer should engage in the interactive process to determine if allowing the employee to bring the child to work for purposes of breastfeeding is a reasonable accommodation. The attorney noted that what is reasonable will depend on the circumstances.

BENEFITS CORNER

Texas Federal District Court Judge Strikes Down Entire ACA.

LCW previously reported via a [Special Bulletin](#) that a federal district judge in Texas ruled on Friday, December 14, 2018, that the Patient Protection and Affordable Care Act’s (“ACA”) individual mandate was unconstitutional, and that the ACA’s other provisions were therefore also invalid.

Last year, Congress reduced the shared responsibility payment amount to zero, effective January 1, 2019, as part of the Tax Cuts and Jobs Act of 2017. According to the district court ruling, when this change in the law takes effect, it will eliminate the individual mandate’s constitutional hook. The district court further ruled that the remainder of the ACA was invalid absent the individual mandate. LCW will continue to monitor and report on this district court ruling as it proceeds through the court system.

Federal Government's Proposed Regulations on HRAs.

On October 29, 2018, the U.S. Departments of the Treasury, Health & Human Services, and Labor jointly issued proposed regulations expanding permitted uses for health reimbursement arrangements (HRAs). An HRA is a type of group health plan that allows employers to fund medical care expenses for their employees on a pre-tax basis. Employer contributions fund HRAs, and can only be used to reimburse an employee for the medical care expenses (as defined by the IRS) of the employee, the employee's spouse, children, or tax dependents. HRAs qualify for pre-tax treatment because they are considered group health plans, and therefore have historically not been able to be used to pay premiums for coverage in the individual market.

If the proposed regulations are finalized, employers will be allowed (starting January 1, 2020) to establish two new types of HRAs that were not previously allowed under the ACA: Premium Reimbursement HRAs and Excepted Benefit HRAs.

Premium Reimbursement HRAs would provide for reimbursements for premiums for individual health insurance. Employers would need reasonable procedures to verify that an individual is enrolled, such as attestation by the employee or documentation from a third-party. An employer could not offer employees a choice of either this HRA or a traditional group health plan. Employers could divide employees into separate classes and offer some classes an HRA and others a traditional group health plan as long as the HRA is offered according to the same terms and conditions to all employees within such class. The proposed regulations define these allowable classes (e.g. full-time, part-time, seasonal, union, primary employment site), but classes based on hourly and salaried employees are not permitted.

Excepted Benefit HRAs could only be *offered* to participants who are also offered coverage under

a traditional group health plan. Employees may still choose to enroll in this type of HRA even if they do not enroll in the group health plan. Employers would be able to fund this HRA up to \$1,800 per year, with carryover amounts into the future. This HRA would not be available to reimburse premiums paid for individual or group health insurance, or Medicare. The HRA, however, can be used to reimburse premiums for excepted benefits (such as dental or vision coverage). Also note, this HRA would also be considered an excepted benefit, which is not subject to the ACA's prohibition on annual or lifetime limits.

Employers wishing to establish the HRAs set forth by the proposed regulations will not be able to do so until at least January 1, 2020. Existing rules under the ACA still apply, and they impose substantial penalties on most employers using HRAs to reimburse employees for individual health insurance premiums. There are also multiple requirements, exceptions and considerations to account for in establishing these contemplated HRAs, and employers should confer with legal counsel and other professionals throughout that process.

ACA Reporting Deadlines.

The upcoming 2019 filing and reporting deadlines under the ACA for 2018 coverage are as follows:

- February 28, 2019 – Deadline to file paper reporting forms to the IRS, if employers choose this option in lieu of e-filing.
- March 4, 2019 – Deadline to furnish Form 1095-C to employees (extended from January 31, 2019 per IRS Notice 2018-94).
- April 1, 2019 – Deadline to e-file reporting forms to the IRS (must e-file with over 250 forms).

Applicable Large Employers (ALEs) (employers with 50 or more full-time employees, including full-time equivalents) are required to report proof

of compliance with the ACA's Employer Shared Responsibility Mandate. Though IRS Form 1094-C, ALEs report required information about whether they offered minimum essential health coverage (MEC) to substantially all of their full-time employees and their dependents. Employers also must furnish IRS Form 1095-C to report whether the lowest cost plan offered to its full-time employees was affordable for the previous calendar year. IRS Form 1094-C is also the form used to transmit Form 1095-C to the IRS.

ALEs must fill out Part III of Form 1095-C if they offer employer-sponsored, self-insured health coverage in which an employee or other individual enrolled. Therefore, note that Part III on IRS Form 1095-C must be completed for employers with Self-Insured Retiree-Only HRAs (i.e. those that reimburse medical expenses and not just premiums). Retiree-Only HRAs are generally used to assist retirees purchase coverage from a public health insurance marketplace.

Small employers with less than 50 full-time employees or full-time equivalents may not be required to file Forms 1094-C and 1095-C, unless for example they are self-insured, in which case

they would need to file Forms 1094-B and 1095-B. Further instructions for filling out applicable IRS forms are accessible on the IRS' website. ACA reporting can be a time-consuming and complex process. Employers are advised to gather the necessary information and prepare proper documentation for ACA reporting purposes. LCW is available for all ACA compliance needs. For further information, please visit our ACA practice area website.

Fixed Indemnity Benefits.

As tax season looms around the corner, employers should be aware of certain taxable implications of fixed indemnity benefits. Fixed indemnity health plans provide supplemental coverage of a fixed cash benefit payout directly to the employee for certain health-related events. Employers should note that if they are providing these benefits on a pre-tax basis through a Section 125 plan, then benefits should be taxed when paid out to employees. If benefits are not taxed when paid out, then they should not be offered as a pre-tax benefit under a Section 125 Cafeteria Plan. These benefits could, however, be offered outside of the Cafeteria Plan on an after-tax basis.

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NEW TO THE FIRM



Kaylee Feick is an Associate in our Los Angeles Office where she provides representation and counsel to clients in all matters pertaining to labor, employment, and education law. She provides support in litigation claims for discrimination, harassment, retaliation, wage and hour disputes, and other employment matters. Kaylee has experience in litigation procedures such as drafting pleadings and discovery. She also has experience in trial preparation, including researching and drafting pretrial motions and preparing witnesses for trial. She can be reached at 310-981-2735 or kfeick@lcwlegal.com.



*Developing Positive Partnerships
and Leadership Excellence
for Labor Relations Professionals*

The Liebert Cassidy Whitmore **Labor Relations Certification Program**© is designed for labor relations and human resources professionals who work in public sector agencies. These workshops combine educational training with experiential learning methods ensuring that knowledge and skill development are enhanced. Participants may take one or all of the six offered certification programs, in any order, to earn their certificate. View all of the classes at www.lcwlegal.com/LRCP!

Upcoming Classes:

Costing Labor Contracts

January 23, 2019 | Palm Desert

This workshop will serve as pre-conference to the 2019 Public Sector Employment Law Annual Conference

Trends & Topic at the Table


February 13, 2019 | San Mateo

REGISTER AND VIEW OUR FUTURE SEMINARS AT WWW.LCWLEGAL.COM/LRCP

LCW LIEBERT CASSIDY WHITMORE

**BECOME A
CERTIFIED
HARASSMENT
PREVENTION
TRAINER FOR
YOUR AGENCY**

LCW Train the Trainer sessions will provide you with the necessary training tools to conduct the mandatory AB 1825, SB 1343, AB 2053, and AB 1661 training at your own agency.

 California Law (AB 1825, SB 1343) requires employers with five or more employees to provide harassment prevention training to all employees **by the end of 2019**. Supervisors **must** participate in a 2-hour course, and now, non-supervisors **must** participate in a 1-hour course.

QUICK FACTS ON LCW TRAIN THE TRAINER PROGRAM

- ✓ Trainers will become certified to train both supervisors and non-supervisors
- ✓ One-day sessions provide 6 hours of instruction
- ✓ Attendees receive updated LCW materials for 2 years
- ✓ Pricing: \$2,000 per person (\$1,800 for ERC members)

UPCOMING DATES

Fresno - February 15, 2019
 San Diego - February 19, 2019
 San Francisco - March 13, 2019
 Los Angeles - April 10, 2019
9:00 a.m. - 4:00 p.m.

TO REGISTER

Contact Anna Sanzone-Ortiz
 ASanzone-Ortiz@lcwlegal.com
 310.981.2051
LCWLEGAL.COM

MANAGEMENT TRAINING WORKSHOPS

Firm Activities

Consortium Training

Jan. 9	“Supervisor’s Guide to Public Sector Employment Law” Gold Country ERC Webinar & Placerville Jack Hughes
Jan. 10	“Maximizing Performance Through Evaluation, Documentation and Corrective Action” and “The Art of Writing the Performance Evaluation” East Inland Empire ERC Fontana Christopher S. Frederick
Jan. 10	“Maximizing Supervisory Skills for the First Line Supervisor” Gateway Public ERC Santa Fe Springs Kristi Recchia
Jan. 10	“Public Sector Employment Law Update” North State ERC Webinar Richard S. Whitmore
Jan. 10	“Public Sector Employment Law Update” San Diego ERC Webinar Richard S. Whitmore
Jan. 10	“Public Sector Employment Law Update” San Mateo County ERC Webinar Richard S. Whitmore
Jan. 16	“Management Guide to Public Sector Labor Relations” South Bay ERC Manhattan Beach Melanie L. Chaney
Jan. 16	“Public Sector Employment Law Update” Ventura/Santa Barbara ERC Webinar Richard S. Whitmore
Jan. 17	“Advanced FLSA” and “Public Sector Employment Law Update” Coachella Valley ERC La Quinta Elizabeth Tom Arce
Jan. 17	“Labor Negotiations from Beginning to End” LA County HR Consortium Los Angeles Adrianna E. Guzman
Jan. 17	“Preventing Workplace Harassment, Discrimination and Retaliation” and “Moving Into the Future” West Inland Empire ERC Diamond Bar Kevin J. Chicas
Feb. 6	“Maximizing Supervisory Skills for the First Line Supervisor” Central Coast ERC Paso Robles Kelly Tuffo
Feb. 7	“Issues and Challenges Regarding Drugs and Alcohol in the Workplace” Bay Area ERC Webinar Heather R. Coffman
Feb. 7	“Advanced FLSA” Gateway Public ERC La Mirada Jennifer Palagi
Feb. 7	“Preventing Workplace Harassment, Discrimination and Retaliation” San Mateo County ERC Menlo Park Morin I. Jacob
Feb. 13	“Human Resources Academy I” and “Introduction to the FLSA” San Gabriel Valley ERC Alhambra Jennifer Palagi
Feb. 14	“Human Resources Academy II” and “Negotiating Modifications to Retirement and Retiree Medical” San Diego ERC San Marcos Frances Rogers

- Feb. 20 **“Legal Issues Regarding Hiring & Promotions” and “Human Resources Academy I”**
Central Valley ERC | Clovis | Tony G. Carvalho & Jesse Maddox
- Feb. 20 **“Employees and Driving” and “Navigating the Crossroads of Discipline and Disability Accommodation”**
North State ERC | Orland | Kristin D. Lindgren
- Feb. 20 **“Workplace Bullying: A Growing Concern” and “Prevention and Control of Absenteeism and Abuse of Leave”**
Ventura/Santa Barbara ERC | Camarillo | Christopher S. Frederick
- Feb. 21 **“Technology and Employee Privacy”**
LA County HR Consortium | Los Angeles | Christopher S. Frederick
- Feb. 21 **“Public Service: Understanding the Roles and Responsibilities of Public Employees” and “Managing the Marginal Employee”**
South Bay ERC | Redondo Beach | Laura Drottz Kalty & Ronnie Arenas
- Feb. 28 **“Management Guide to Public Sector Labor Relations” and “Exercising Your Management Rights”**
Napa/Solano/Yolo ERC | Suisun City | Jack Hughes
- Feb. 28 **“Maximizing Performance Through Evaluation, Documentation and Corrective Action” and “The Art of Writing the Performance Evaluation”**
West Inland Empire ERC | Chino Hills | Christopher S. Frederick

Customized Training

- Jan. 15 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of Santa Monica | Kristi Recchia
- Jan. 15 **“Bias in the Workplace”**
ERMA | Cathedral City | Jennifer Rosner
- Jan. 15 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
Las Gallinas Valley Sanitary District | San Rafael | Erin Kunze
- Jan. 16 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
Fairfield-Suisun Sewer District | Fairfield | Gage Dungy
- Jan. 17 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of Hesperia | Danny Y. Yoo
- Jan. 17 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of Santa Monica | Jennifer Rosner
- Jan. 18 **“Embracing Diversity”**
Los Angeles Conservation Corps | Los Angeles | Jennifer Rosner
- Jan. 24, 30 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of Santa Monica | Christopher S. Frederick
- Jan. 29 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of Ventura | Shelline Bennett
- Feb. 5,7,12,14 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
Midpeninsula Regional Open Space District | Los Altos | Erin Kunze
- Feb. 6 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
Midpeninsula Regional Open Space District | Los Altos | Lisa S. Charbonneau

- Feb. 7 **“Bias in the Workplace”**
ERMA | Hughson | Kristin D. Lindgren
- Feb. 7 **“Supervisor’s Guide to Public Sector Employment Law”**
Mariposa County | Mariposa | Gage C. Dungy
- Feb. 11 **“Ethics in Public Service”**
City of Bellflower | James E. Oldendorph
- Feb. 13 **“Technology and Employee Privacy in the Workplace”**
City of Fountain Valley | Laura Drottz Kalty
- Feb. 13 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
ERMA | Garden Grove | Christopher S. Frederick
- Feb. 13 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
Midpeninsula Regional Open Space District | Los Altos | Lisa S. Charbonneau
- Feb. 20, 21 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
Mendocino County | Ukiah | Jack Hughes
- Feb. 26 **“Legal Issues Update”**
Orange County Probation | Santa Ana | Christopher S. Frederick
- Feb. 28 **“DOT and Reasonable Suspicion”**
City of Mountain View | Heather R. Coffman

Speaking Engagements

- Jan. 9 **“The Leadership Role of Finance and FLSA Compliance”**
California Society of Municipal Finance Officers (CSMFO) Annual Conference | Palm Springs | Brian P. Walter & Lori Sassoon
- Jan. 10 **“Legal Update”**
International Public Management Association for HR (IPMA) Sacramento-Mother Lode Chapter Meeting | Roseville | Gage C. Dungy
- Jan. 16 **“What Public Procurement Officials Need to Know About California’s New Independent Contractor Test”**
California Association of Public Procurement Officers (CAPPO) Conference | Sacramento | Kristin D. Lindgren
- Jan. 28 **“Performance Management - Evaluation, Documentation and Discipline” and “The Art of Writing the Performance Evaluation”**
National Association of Housing and Redevelopment Officials (NAHRO) | Napa | Kristin D. Lindgren
- Jan. 30 **“Legal Update”**
Inland Empire Public Management Association for Human Resources (IEPMA-HR) | Riverside | J. Scott Tiedemann
- Jan. 30 **“AB 1661 Training”**
League of California Cities New Mayors and Council Members Academy | Irvine | Laura Drottz Kalty
- Feb. 5 **“Annual Employment Law Update: Recent Cases and Trends”**
California Special Districts Association (CSDA) Webinar | Gage C. Dungy
- Feb. 21 **“Legislative and Legal Update”**
Southern California Public Labor Relations Council (SCPLRC) Annual Conference | Lakewood | J. Scott Tiedemann
- Feb. 21 **“Courageous Authenticity - Do You Care Enough to Have Critical Conversations?”**
SCPLRC Annual Conference | Lakewood | Kristi Recchia

Feb. 28 **“Legal Update”**
 County Counsel Association Employment Law Conference | Sacramento | Morin I. Jacob

Seminars/Webinars

- Jan. 18 **“Train the Trainer Refresher: Harassment Prevention”**
 Liebert Cassidy Whitmore | San Diego | Judith S. Islas
- Jan. 23 **“Costing Labor Contracts”**
 LCW Conference 2019 | Palm Desert | Peter J. Brown & Kristi Recchia
- Jan. 24-25 **“2019 LCW Conference”**
 Liebert Cassidy Whitmore | Palm Desert
- Jan. 28 **“Train the Trainer Refresher: Harassment Prevention”**
 Liebert Cassidy Whitmore | Fresno | Shelline Bennett
- Jan. 28 **“Train the Trainer Refresher: Harassment Prevention”**
 Liebert Cassidy Whitmore | San Francisco | Erin Kunze
- Feb. 6 **“Hot Topics in Negotiations”**
 Liebert Cassidy Whitmore | Webinar | Richard C. Bolanos
- Feb. 15 **“Train the Trainer: Harassment Prevention”**
 Liebert Cassidy Whitmore | Fresno | Shelline Bennett
- Feb. 13 **“Trends & Topics at the Table”**
 Liebert Cassidy Whitmore | TBD | Kristi Recchia
- Feb. 19 **“Train the Trainer: Harassment Prevention”**
 Liebert Cassidy Whitmore | San Diego | Judith S. Islas
- Feb. 26 **“Nuts & Bolts of Negotiations”**
 Liebert Cassidy Whitmore | Fresno | Shelline Bennett & Kristi Rechia



FIRM PUBLICATIONS

To view these articles and the most recent attorney-authored articles, please visit: www.lcwlegal.com/news

“Attorneys Expect Narrow High Court Ruling in State Employees Pension Case” quote by [Steven M. Berliner](#) of our Los Angeles office, appeared in the December 17, 2018 issue of the *Daily Journal*.

“Flores v. City of San Gabriel Two Years Later” authored by [Lisa S. Charbonneau](#) of our San Francisco office, appeared in the November/December 2018 issue of *CSDA Magazine*.



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If you have any questions, contact **Sara Gardner-Madiuk** at 310.981.2000 or at info@lcwlegal.com.

LCW LIEBERT CASSIDY WHITMORE

6033 West Century Blvd., 5th Floor | Los Angeles, CA 90045

 CalPublicAgencyLaborEmploymentBlog.com |  @lcwlegal

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