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To: [WHDPRAComments](#)
Cc: [Marcy Hudson](#); [Andrew Colosimo](#)
Subject: Proposed Revision Comments of the Information Collection Request FMLA
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Attachments: [image002.png](#)

Colorado Springs Utilities is a municipal utility that provides water, wastewater, gas, and electric utility services to approximately 450,000 residents in the Pikes Peak Region. As a community owned utility, we focus on maintaining safe, reliable and competitively priced utilities, providing exceptional service, and responsible environmental practices. We have approximately 1,850 employees dedicated to serving our community and a 100-year reputation of excellence.

Thank you for allowing us the opportunity to comment on the proposed revisions to the U.S. Department of Labor's Wage and Hour Division's optional-use FMLA forms. We do have a few suggestions to revise the forms, improve customer service, and reduce the burden on the public by making the forms easier to use and understand.

- **Form Consolidation-** The existing forms are very cumbersome and the number of forms required is also a challenge for employees, physicians, and employers. It would be helpful if forms were consolidated to reduce the number of forms and improve efficiency in documentation.
- **Form Redundancy-** Many of the forms require the same information, creating form redundancy. An improvement in this process would be one form that could be used in multiple circumstances. Various check boxes at the top of the form and directions in applicable form sections would help.
- **Narrative Space-** There is too much space on the forms for written narrative. Our experience with physician practices have shown that they will not complete the form if it is too lengthy. Incomplete forms result in additional time and effort for employers to search for additional information and for employees having to take forms back to the physician's office multiple times. In addition, some physicians charge a fee for the completion of the forms, creating a financial burden for employees.

We appreciate the opportunity to provide input on these forms that provide important protection for employees. If you have any questions about our comments, please contact Marcy Hudson, Human Resources General Manager, at 719-668-7526 or mlhudson@csu.org.

Thank you,

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