

From: [Nancy Stevens](#)
To: [WHDPRAComments](#)
Subject: Wage and Hour Division Department of Labor - Control Number 1235-000 - Proposed revision of the information collection request (ICR) titled, "The Family and Medical Leave Act of 1993, As Amended."
Date: Thursday, October 03, 2019 3:47:32 PM

I administer Family Medical Leave Act (FMLA) absences for my employer and wish to provide comment regarding the proposed changes to FMLA certifications.

The suggested changes, moving to the most part of check boxes, I believe will be confusing for Health Care Provider (HCP) and result in information being overlooked and/or not completed.

This form does not attempt to resolve the major concern of HCP skipping questions or completing questions with vague information such as "Unknown".

The layout of check boxes are such that these could likely be missed. *Check boxes on the left side of the form for the type of serious health condition at issue and then the HCP must complete check boxes within each category.*

The form appears to call for the HCP to make the legal conclusions at issue, rather than merely answering questions. The proposed forms organize the questions around different definitions of serious health condition and includes a page with the Definition of Serious Health condition. *This could result in the HCP checking boxes in multiple categories on the proposed form. The existing form gathers the same information but without heading highlighting the different definitions or a separate page with the definitions.*

With the proposed revisions the HCP may answer questions that do not apply to the circumstances involved in the leave request. *It would be helpful to have check box for "Yes" or "No" or "Not Applicable" along the left margin of each section.*

Thank you for your consideration of these comments.

Nancy Stevens