From: Fraley, Katie

To: WHDPRAComments

Subject: Control Number 1235-0003

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## To Whom it May Concern:

- Certified mail is the recommended method to deliver FMLA documents, however, in our organization many pieces of mail go unclaimed. Electronic or documented verbal notices are more effective and less time consuming.
- Physician's often charge for certifications and they are only useful in more complex situations such as chronic illness that leads to intermittent time off. While these forms may be optional, the process is not.
- The time frames are not reasonable and most employees do not give their employer 30 days advanced notice even when it is foreseeable. Employers of entry level and unskilled workers are challenged with compliance timelines and documenting evidence of compliance, but also spend a great deal of time trying to educate their people managers and workforce, so the timeframes associated with a leave of absence are not in line with fine print at the bottom of WHO forms.
- Defining "hardship" on either the DOL or ADA website should be more specific because employers have a different understanding even when the definition "impeding business" is provided during an analysis.

When considering a change in paperwork or required protocol, these are day to day challenges that employers face that take more time than estimated per case.

Thank you,

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