ERISA Fiduciary Training for New Union Officers

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This presentation will cover:

- What it means to be an ERISA fiduciary.
- The types of employee benefit plans that an ERISA fiduciary oversees.
- How employee benefit plans are managed.
- The primary laws the apply.
- How ERISA fiduciaries are identified.
- The duties of an ERISA fiduciary.
- Prohibited transactions and conflicts.
- Bonding and Insurance.

What is a Fiduciary?

- A fiduciary is someone who has special relationship of trust or responsibility to another such as guardian, estate executor or fiduciary of family trust.

What it Means to be an ERISA Fiduciary

- You are responsible for large sums of money.
- You are subject to close government scrutiny.
- You must comply with an often confusing collection of complex laws.
- If you do not do your job properly, your members or employees may be harmed.
- You generally get no compensation for your work.
- You can be held personally liable if you breach your duties as a fiduciary.

What it Means to be an ERISA Fiduciary

- Your professional background and training is in an entirely different field. Everything you know about being a plan fiduciary, you have to learn.
- Your conduct under ERISA is judged against what a ***person familiar with such matters*** would do in a similar situation.
  - Standard of care –"such care and skill as a man of ordinary prudence would exercise in dealing with his own property". *See Central States Pension Fund v. Central Transport, Inc.*, 472 U. S. 559, 572 (1985) (citing G. Bogert & G. Bogert, Law of Trusts and Trustees § 582, p. 346 (rev. 2d ed. 1980)).

Yes, it’s a lot to know… but –

- You know what you don’t know.
- You understand that you can’t go it alone – so you work with professionals and listen to their advice.
- You ask questions until you understand.
- You maintain adequate insurance.
- You receive education and training such as this presentation.

PRELIMINARY CONCEPTS: WHAT IS AN EMPLOYEE BENEFIT PLAN?

What is a Employee Benefit Plan under ERISA ?

- Any plan, fund or program established by a union, an employer or both.
- Established for purposes specified in statute.
- May include arrangements which you do not recognize as a plan.
- ERISA categorizes plans as pension plans and welfare plans.

What is a Pension Plan?

- A Pension Plan:
  - Provides retirement income to employees; or
  - Results in deferral of income by employees for periods extending to termination of employment or beyond.

Types of Pension Plans

- Pension Plans can be Qualified or Nonqualified.
- Benefits of having a Qualified Plan:
  - Employers get tax deduction for contributions.
  - Employees do not pay tax on contributions.
  - Earnings of the plan accumulate tax free.
  - Certain distributions may be rolled over tax free.
- A Qualified Plan may be designed as a Defined Benefit or Defined Contribution Plan.

Defined Contribution Plans

- A Defined Contribution Plan means a pension plan which establishes an individual account for each participant. The benefit available to each participant is based solely on the amount contributed, along with any income expenses, gains, losses, and forfeitures.
- Defined Contribution Plans are often called Annuity Plans, Supplemental Pension Plans, or Individual Account Plans.

Defined Contribution Plan Investments

- Defined Contribution Plan assets may be invested by the Trustees or by participants.
- A Trustee-directed investment portfolio typically results in reduced expenses. But the Trustees are on the hook for managing the money properly.
- A Participant-directed investment portfolio allows participants to choose amongst various options for where to invest their accounts.

Participant-Directed Defined Contribution Plans

- Participant-directed Defined Contributions Plans have become more prevalent over the years because:
  - Participants can see their account balances online.
  - The value of their balances are updated daily.
  - Participants have control over investments.
  - To fulfill their duties, Trustees have to monitor investment options, review performance, ensure that fees are reasonable, and make changes as necessary.

Defined Contribution Plan Distribution Options

- Defined Contribution Plans are typically classified as Profit-Sharing Plans or Money Purchase Plans.
- Profit-Sharing Plans may make distributions to participants upon death, disability, retirement, severance from employment, reaching an age specified in the plan, suffering a hardship, or after at least two years.

Defined Contribution Plan Distribution Options

- In-service distributions, such as hardship distributions or other kinds of distributions made while still working, are generally not available under a Money Purchase Plan. But there is an age 59 1/2 exception.
- Benefits are typically paid as a lump-sum, in installments, or as an annuity purchased from a provider that gives you monthly lifetime payments.

Defined Benefit Plans

- The term Defined Benefit Plan means a pension plan other than a Defined Contribution Plan.
- Benefits are determined by using a formula in the Plan Document. The formula, for example, can be based on a percentage of contributions remitted on your behalf, a percentage of your final average salary, or service credits multiplied by a dollar value.

What is a Welfare Plan?

- A Welfare Plan may provide:
  - Medical, surgical, and hospital care benefits.
  - Benefits in event of sickness, accident, disability, death, or unemployment.
  - Vacation Benefits.
  - Apprenticeship Programs.
  - Scholarship Programs and Educational Assistance.
  - Prepaid Legal Services and Other Benefits.

Types of Welfare Plans

- Defined Benefit: Specified benefits paid from plan assets or an insurance company.
  - Self-insured welfare plans typically retain an insurance company to provide access to a network of doctors in an effort to reduce plan and participant costs.
- Defined contribution: Cafeteria plan, flexible spending account (FSA), health reimbursement arrangement (HRA), health savings account (HSA).

PLAN MANAGEMENT

Plan Management

- Three Governing Documents
  - Agreement and Declaration of Trust.
    - Defines how the Plan is governed.
  - Plan Document.
    - Defines the rights of participants and beneficiaries.
  - Collective Bargaining Agreement.
    - Defines the contribution obligations of employers.
- The "Named Fiduciary" and "Administrator" are responsible for managing the Plan. They fulfill their duties with the help of service providers.

Plan Management

- **Investment Consultant**
  - If you do not have expertise in the area of investments, it is prudent to retain a qualified Investment Consultant.
  - Among other things, the Investment Consultant assists you in developing and complying with a written Statement of Investment Policy, setting appropriate asset allocation targets, monitoring investment performance and fees, determining whether to replace an investment, and selecting new investments.
- **Statement of Investment Policy**
  - Ensures that the Plan's investment portfolio is sufficiently diversified;
  - Defines investment categories offered by the Plan;
  - Establishes benchmarks and performance standards;
  - Establishes reporting and monitoring procedures;
  - Defines the procedures for investment selection, evaluation and formal review; and
  - Sets guidelines and procedures for the removal and replacement of an investment.

Plan Management

- **Auditor / Accountant**
  - Audits the Plan's Financial Statement.
  - Prepares the Plan's Annual Tax Return (Form 5500 / Report of Employee Benefit Plan, or Form 990 / Return of Organization Exempt from Income Tax).
  - Conducts Employer Payroll Audits.
  - Performs Related Accounting Services.

Plan Management

- **Actuary (Defined Benefit & Welfare Plans)**
  - Advises on adequacy of Plan Funding on the basis of reasonable assumptions.
  - Advises as necessary regarding measures to improve Plan Funding as well as the impact of such measures.
  - Advises on trends and developments in the medical and pension plan communities.
  - Prepares and files mandated actuarial reports with government agencies.

Plan Management

- **Recordkeeper (Defined Contribution Plans / Participant-Directed Investments)**
  - Maintains an online platform through which participants may self-direct assets held in their individual accounts among various investment options.
  - Educate participants regarding how to use the online platform and the investment options available to them.

Plan Management

- **Administrator**
  - Responsible for the Plan's day-to-day operations.
  - Handles contribution reporting, maintenance and collections.
  - Processes Benefits and maintains eligibility listing.
  - Maintains financial statements and other records.
  - Handles participant inquiries.
  - Works with other Service Providers to ensure effective Plan Administration.

- **Some examples of what your Administrator and Assistant Administrator keep:**
  - Agreement and Declaration of Trust
  - Plan Documents
  - Summary Plan Descriptions
  - Collective Bargaining Agreements
  - Annual audited financial statements
  - Governmental Filings (e.g., Form 5500s, 990s)
  - Service provider agreements
  - Minutes and agenda of trustee meetings.
  - Trustee written acceptances and resignations
  - Insurance policies
  - Expense reimbursement vouchers and receipts
  - Accounting records
  - Banking and financial account records

Plan Management

- **Legal Counsel**
  - Advises on compliance with ERISA, the Internal Revenue Code, and the underlying regulations of each. This includes fiduciary compliance, as well as compliance with laws like the Affordable Care Act.
  - Handles plan drafting and ensures that the plan qualifies by design for favorable tax treatment.
  - Collects delinquent contributions and withdrawal liability.
  - Handles litigation and helps prevent litigation.

WHAT ARE THE PRIMARY LAWS THAT APPLY?

Basic Legal Issues Applicable to ERISA Fiduciaries

- The Taft-Hartley Act
- Internal Revenue Code
- Employee Retirement Income Security Act of 1974. a.k.a. ERISA
  - Title I: Protection of Participants (DOL)
  - Title II: Plan Qualification Requirements (IRS)
  - Title III: Administrative and Agency Provisions
    - Allocates authority between the Department of Labor and the Internal Revenue Service.
  - Title IV: Plan Termination Insurance (PBGC)

Taft-Hartley Act

- Provides structural rules for collectively bargained multiemployer plans.
- Makes it a crime for an employer to pay or agree to pay anything of value to a representative of its employees.
- Exception for payments made to a trust fund established for the sole and exclusive benefit of employees of the employer and families and dependents.
- Trust fund must meet certain requirements.

Taft-Hartley Act
Exception Requirements

- Payments held in trust for purposes permitted by Taft-Hartley.
- Contributions made pursuant to a written agreement.
- Equal labor-management representation on board of trustees and mechanism for breaking a trustee deadlock.
- Trust audited annually.

Internal Revenue Code

- Internal Revenue Code rules for qualified retirement plans.
- Qualified plans receive special tax treatment by meeting requirements of the IRC.
  - Employers get tax deduction for contributions.
  - Employees do not pay tax on contributions.
  - Earnings of the plan accumulate tax free.
  - Certain plan distributions may be rolled over.
- Voluntary compliance program to correct errors.

ERISA Title I

- Definitions and Coverage
- Reporting and Disclosure
- Participation and Vesting
  - Minimum participation, vesting and benefit accrual requirements.
  - Form and payment of benefits; joint and survivor annuity
- Funding
  - Minimum funding standards; variance (includes PPA provisions).

ERISA Title I

- Administration and Enforcement
  - Criminal penalties
  - Civil actions
  - Delinquent contributions
  - Interference with protected rights
  - Preemption

ERISA Title I

- COBRA
- Various Health Plan Provisions
  - Prohibits health status discrimination.
  - Benefits for mothers and newborns.
  - Mental health parity.
  - Provisions of Affordable Care Act.

ERISA Title I

- Fiduciary responsibility
  - Establishment and structure of plan
  - Fiduciaries and fiduciary duties
  - Liability for fiduciary breach
  - Prohibited transactions
  - Bonding and insurance

IDENTIFYING FIDUCIARIES

Who is a Fiduciary under ERISA?

- An individual is a fiduciary to the extent that--
  - he exercises discretionary control or management of plan;
  - he exercises any authority or control respecting management or disposition of plan assets;
  - he renders investment advice for direct or indirect fee or compensation;
  - he has any discretionary authority or responsibility in the administration of the plan.
- This is a <u>functional</u> definition.

How does the functional fiduciary test work?

- A person is a fiduciary when performing a fiduciary function.
  - A fiduciary may wear “two hats” but not at the same time. The non-fiduciary hat and interests must be put aside when performing fiduciary functions.
- A person is a fiduciary “to the extent” he/she is performing a fiduciary function.
  - Fiduciary role is limited by scope and duration of fiduciary responsibility.

Fiduciary Status Determined by Role

- A person performing certain roles is always a fiduciary--
  - "Named Fiduciary" as defined in ERISA.
  - "Administrator" as defined in ERIA.
  - "Investment Manager" as defined in ERISA.
- Named fiduciary.
  - Named in plan documents, must have at least one.
  - Joint board of trustees is usually "named fiduciary" for multiemployer plan.
  - May appoint investment managers.

Fiduciary Status Determined by Role

- Investment Managers
  - Must be a registered investment advisor, bank or insurance company,
  - Must acknowledge fiduciary status in writing.
  - Plan documents must permit delegation to an investment manager.

Not All Service Providers Are Fiduciaries

- Important to determine the fiduciary status of service providers. For example:
  - TPA or recordkeeper of participant directed plan may not be a fiduciary;
  - Investment vehicle, such as mutual fund, may not be investment manager and is not a fiduciary.

FIDUCIARY DUTIES

Fiduciary Duties

- Duty to act solely in the interest of participants and beneficiaries and—
  - Carry out duties **prudently;**
  - **Act solely in the interest of Plan Participants and their Beneficiaries** and with the exclusive purpose of providing benefits to them;
  - **Diversify** Plan investments;
  - Follow the terms of Plan Documents (unless documents are inconsistent with ERISA);
  - Pay only **reasonable Plan expenses**.

Prudence: The Expert Standard

- Fiduciaries are held to the standard of a prudent person "familiar with such matters".
- This is a higher standard than a business conduct standard or the conduct of an ordinary prudent person.
- The standard requires use of experts when plan fiduciaries do not have relevant expertise.
- Very important in connection with investments.

Prudence: Procedure & Process

- Whether fiduciary acted prudently depends on specific facts and circumstances. Fiduciary must give "appropriate consideration" to facts and circumstances fiduciary knows/should know are relevant to decision and act accordingly. 29 CFR 2550.404a-1.
- Whether fiduciary has breached prudence standard depends largely on whether fiduciary can demonstrate that he/she engaged in appropriate procedural due diligence before taking action. Procedural due diligence should be formal, documented process. May include written procedures, meetings with minutes, written reports/conclusions.

Loyalty: The General Rule

- Trustees may not act on behalf of any person or entity other than plan participants and beneficiaries.

Loyalty: Trustee and Plan Expenses

- A Trustee may receive "reimbursement of expenses, properly and actually incurred, in the performance of his duties with the plan".
  - No personal expenses, e.g. entertainment.
  - No expenses for services to another plan, employer, union – not incurred in performance of plan duties.
  - No expenses incurred by someone else such as spouse.
  - No excessive expenses--do not satisfy reasonableness/prudence standard for plan; improper.
  - Written policies and good documentation are important.
  - Expenses must be reasonable.

Loyalty: Trustee and Plan Expenses Continued

- ERISA does not prohibit fiduciary from—
  - Receiving any benefit to which he/she may be entitled under plan as participant/beneficiary if benefit is computed/paid consistent with terms of plan as applied to all others.
  - Receiving any reasonable compensation for services rendered to the Plan.
    - However, no person serving as fiduciary who receives full-time pay from employer, association or union may receive compensation from plan—except for reimbursement of expenses as previously described.
  - Serving as fiduciary as well as officer, employee or other representative of party-in-interest.

Diversification

- Fiduciary must diversify plan investments to minimize the risk of large losses unless in the circumstances it is clearly not prudent to do so.
  - Fiduciaries should document review, selection and ongoing monitoring/evaluation of investment products and decisions.
- In participant-directed plans, the investment options must be adequately diversified.
  - A broad range of investment alternatives must be offered to obtain the protections of 404(c).

Following Plan Documents

- Plan documents include:
  - Agreement and Declaration of Trust
  - Plan Document
  - Summary Plan Description
  - Written Policies (e.g., Investment Policy Statement, Collections Policy, Trustee Expense Reimbursement Policy)

Allocation and Delegation of Fiduciary Duties

- Provisions for allocation and delegation must be expressly provided in plan documents.
- Fiduciary duties may be allocated among named fiduciaries or delegated to another fiduciary.
- Responsibility for plan assets may be delegated to an investment manager as defined in ERISA. Delegation protects plan fiduciaries if the investment manager is prudently selected and monitored.

Fiduciary v. Settlor Activities

- Certain activities related to plan, "settlor activities", are not fiduciary activities.
- Settlor activities are not subject to fiduciary rules and restrictions, but plan assets generally may not be spent for settlor activities.
- Settlor activities include establishing plan, amending or terminating plan (unless the amendment is required to maintain tax qualified status), choosing plan design.

Settlor Activities Related to Multiemployer Plans

- Multiemployer plans typically do not have funds other than plan assets to pay for settlor activities such as studying, designing and adopting a discretionary plan amendment.
- DOL Field Assistance Bulletin (FAB) 2002-2 permits fiduciaries of multiemployer plans to spend plan assets for settler functions if plan documents are amended to state that the settlor functions are fiduciary functions. This DOL has not yet been subject to significant court analysis.

PROHIBITED CONFLICTS AND TRANSACTIONS

Prohibited Conflicts | ERSIA 406(b)

- A fiduciary may not--
  - deal with the plan in his own interest;
  - act in a transaction with the plan on behalf of the other (adverse) party;
  - receive personally anything of value from "any party dealing with the plan" in connection with any transaction involving plan assets.
- Violations are *per se*. Reasonableness & motive are irrelevant.

Prohibited Transactions | ERISA 406(a)

- Absent exemption, plan may not engage in direct or indirect transactions with a related party, such as:
  - sale, exchange or lease of property;
  - lending of money or extension of credit;
  - furnishing of goods, services or facilities;
  - transfer to or use by related party of plan assets.

Prohibited Transaction Exemptions

Types of Exemptions:

- Statutory Exemptions– ERISA 408
- Class Exemptions
  - ERISA gives DOL authority to grant administrative exemptions from prohibited transaction provisions if DOL finds exemption to be: administratively feasible, in the interest of the plan and participants/beneficiaries, and that it protects the rights of participants/beneficiaries.
- Individual Exemptions – apply only to parties.

Common Statutory Exemption

- Contracting or making reasonable arrangements with party-in-interest for office space, or legal, accounting, or other services necessary for establishment or operation of plan if no more than reasonable compensation is paid. *See* ERISA 408(b)(2).
  - Recent regulations require pension plans to obtain disclosures from many service providers re fees.
  - Plan fiduciary has duty to determine reasonableness of fees.

Common Class Exemptions

- Sharing of services or office space among multiemployer plans or by multiemployer plan with union or employer—PTCE 76-1; 77-10
- Lease of real property other than office space from union or employer to training fund—PTCE 78-6.
- Reasonable collection procedure, payment arrangements, compromise, write off of amounts owed—PTCE 76-1; 77-10

Selection of Service Providers
Prudence & Prohibited Transactions

- Plan fiduciaries must engage in an objective process to elicit information necessary to assess
  - the qualifications of the provider,
  - the quality of services offered, and
  - the reasonableness of the fees in light of the services provided.
- The process should be designed to avoid self-dealing, conflicts of interest and other improper influence.

LIABILITY

ERISA Fiduciary Liability

- A fiduciary is liable only "to the extent" he is a fiduciary.
  - Fiduciary liability can be limited if fiduciary duties have been delegated or allocated among fiduciaries.
  - Generally, a fiduciary cannot be liable for breaches that occurred before he became a fiduciary. However, a new fiduciary may be liable if he does not remedy an existing breach.
  - A fiduciary may be liable for losses after resignation if he resigned knowing of problems and without making arrangements to correct them.

ERISA Co-Fiduciary Liability

- A fiduciary is liable for the breaches of another fiduciary if--
  - he knowingly participates in or tries to conceal the breach of another;
  - he enables another to breach;
  - he has knowledge of another’s breach unless he tries to remedy it.

Consequences of Fiduciary Breach

- Fiduciaries are personally liable for breaching duties:
  - Fiduciary is personally liable to plan for amount lost and any profits made through use of assets.
  - Criminal penalties apply to any person, not just fiduciary, who willfully violates ERISA.
  - Civil remedies available to DOL and plan participants alleging ERISA violations by fiduciaries to enforce plan terms, enjoin violations, seek equitable relief.
  - DOL may impose monetary fines.
  - Courts may remove fiduciary.

BONDING AND INSURANCE

Fidelity Bonds

- ERISA Section 412 requires every person “who handles funds or other property” of an ERISA plan to be bonded. (*See* DOL FAB 2008-04.)
- Protects Fund from loss due to fraud and dishonesty.
- “Funds” or “Property” includes employer contributions, cash, investments, real estate
- Persons required to be bonded:
  - All Fiduciaries
  - Everyone else who handles Fund assets

Fidelity Bonds

- No deductibles allowed for bond
- Amount of required bond:
  - At least 10% of the amount of plan funds in previous year
  - Bond must be at least $1,000 and does not have to be more than $500,000 ($1M for funds that hold employer securities)
- Cost of bond may be paid from Plan assets

Fiduciary Liability Insurance

- Insures the Plan against losses caused by a fiduciary breach
- Includes costs of defending against a lawsuit alleging breach of fiduciary duty
- Different from a fidelity bond
- Not required by ERISA or DOL - but strongly recommended
- Cost of insurance can be paid from Plan assets

Fiduciary Liability Insurance

- "Elimination of Recourse" Rider
  - Additional rider in fiduciary liability insurance policy
  - Protects fiduciaries' personal assets from a claim by the insurance company
    - If insurance company sustains loss (including settlement) defending against breach of fiduciary duty claim, the insurance company can seek recovery of fiduciaries' personal assets UNLESS policy contains elimination of recourse rider.
  - Cost of rider CANNOT be paid from Plan assets
    - Union, employer or individual trustee pays for rider

APPENDIX:
LISTING OF LAWS AFFECTING MULTIEMPLOYER BENEFIT PLANS

Pension Plans

- Labor Management Relations Act of 1947 (Taft-Hartley)
- Employee Retirement Income Security Act of 1974 (ERISA)
- Revenue Act of 1978
- Multiemployer Amendments Act of 1980
- Tax Equity and Fiscal Responsibility Act of 1982 (TEFRA)
- Deficit Reduction Act of 1984 (DEFRA)
- Retirement Equity Act of 1984 (REA)

Pension Plans

- Tax Reform Act of 1986 (TRA 86)
- Age Discrimination in Employment Amendments of 1986
- Omnibus Budget Reconciliation Acts of 1986, 1987, 1989, 1990, 1993
- Technical and Miscellaneous Revenue Act of 1988
- Unemployment Compensation Amendments Act of 1992
- Retirement Protection Act of 1994 (RPA)
- General Agreements on Tariffs and Trade (GATT)
- Uniformed Services Employment and Reemployment Rights Act (USERRA)

Pension Plans

- Small Business Job Protection Act of 1996
- Tax Payer Relief Act of 1997
- Economic Growth and Tax Relief Reconciliation Act (EGTRRA)
- Sarbanes-Oxley Act
- Pension Funding Equity Act of 2004
- Pension Protection Act of 2006
- U.S. Troop Readiness, Veterans Care, Katrina Recovery and Iraq Accountability Appropriations Act of 2007

Pension Plans

- FMLA Provisions of National Defense Authorization Act 2008
- Heroes Earnings Assistance Relief Tax Act of 2008
- Worker, Retiree and Employer Recovery Act of 2008
- Preservation of Access to Care for Medicare Beneficiaries and Pension Relief Act of 2010
- Moving Ahead for Progress in the 21st Century Act (2012)
- Multiemployer Pension Reform Act of 2014 (MPRA)
- "Tax Cuts and Jobs Act" (2017)
- Bipartisan Budget Act of 2018
- SECURE Act
- American Rescue Plan Act, 2021

Welfare Plans

- Labor Management Relations Act of 1947 (Taft Hartley)
- Employee Retirement Income Security Act of 1974 (ERISA)
- Revenue Act of 1978--Pregnancy Discrimination Amendment
- Technical Corrections Act of 1979
- Multiple Employer Welfare Arrangements Act of 1983
- Deficit Reduction Act of 1984 (DEFRA)
- Age Discrimination in Employment Amendments of 1986
- Omnibus Budget Reconciliation Acts of 1986, 1987, 1989, 1990, 1993

Welfare Plans

- Technical and Miscellaneous Revenue Act of 1988
- Americans with Disabilities Act of 1990
- Family and Medical Leave Act of 1993
- Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA)
- Health Insurance Portability And Accountability Act of 1996
- Newborns and Mothers Health Protection Act of 1996
- Mental Health Parity Act of 1996

Welfare Plans

- Tax Payer Relief Act of 1997
- Women's Health and Cancer Rights Act of 1998
- Medicare Drug Law (Part D).
- CMS Data Reporting – Medicare, Medicaid and SCHIP Extension Act of 2007
- Genetic Information Non-discrimination Act (2008)
- FMLA Provisions of National Defense Authorization Act 2008

Welfare Plans

- Michelle' s Law – Coverage of Dependent Students on Medically Necessary Leave of Absence (2008)
- Mental Health Parity (Emergency Economic Stabilization Act of 2008)
- American Recovery and Reinvestment Act of 2009 (COBRA Subsidy and HITECH)
- Children's Health Insurance Program Reauthorization Act of 2009(CHIP).
- Patient Protection and Affordable Care Act of 2010 (ACA)
- Consolidated Appropriations Act of 2016 (Excise Tax delay)
- "Tax Cuts and Jobs Act" (2017)
- CAA, CARES Act, FFCRA