



# V A L L E Y E M P L O Y E R S A S S O C I A T I O N

## FACSIMILE COVER SHEET

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Subject: FMLA Regulations/Section 825.203 Total no. pages: 2

### COMMENTS

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*Human Resource Services for Employers since 1938*

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Subject: **FMLA Regulations/Section 825.203**  
“Intermittent” Usage of Leave

The view of the undersigned as to the above provision can be summarized by contrasting the following considerations:

1. **The Relative Value Of Partial Day Absences:** Aside from the encouragement of abuse, the relative value of absences consisting of portions of a day to an otherwise legitimate beneficiary of FMLA is marginal at best. When the time and expense for personal preparation and the commute to and from **work** is taken into account, the amount of earnings at work for **partial** days may be totally offset.
2. **Disruption Of Work Processes:** The employer’s administrative burden is entirely disproportionate to attainment of any real benefit to the employee. Coping **with** irregularities in attendance poses a substantial threat to productivity to say the least – particularly as the challenge **may** pertain to planning, scheduling, and accounting for the hours of absence.

Valley Employers Association