

**Cashflow and Payroll Options for Health Centers**

**with less than 500 staff**

**during the Covid-19 Crisis**

*As of 4/7/2020*

***Important****: This is an evolving document, and will be updated as new information becomes available.*

*The most up-to-date version of this document will always be available on the NACHC COVID webpage and Noddlepod.*

*Please contact Colleen Meiman at* *cmeiman@nachc.org* *with questions.*

# Introduction

As health centers play a crucial role in responding to the COVID-19 pandemic, many are encountering severe and unprecedented drops in short-term revenue, due to sharp decreases in routine visits as patients shelter in place, and the need to reduce or stop some services in order to divert PPE and other resource to COVID-19 efforts. As health centers’ cash reserves drop, many now face difficult decisions on how to meet payroll or other financial obligations. This document provides an overview of new programs that health centers – as well as PCAs, HCCNs, and NTTAPs[[1]](#footnote-1) - can tap to cover revenue shortfalls and to help their employees make ends meet during this time.

The document begins with a chart summarizing the programs, and is followed by an overview of each program.

There are important distinctions between the options available for health centers (and other organizations) with less than 500 employees, and those above 500 employees. For example, Paycheck Protection Loans and Emergency Paid Leave are available only to health centers with fewer than 500 employees, while “Main Street Loans” will likely be available only to health centers with over 500 employees. Accordingly, NACHC has now created two separate documents on cashflow options for health centers, based on the total number of health center employees.

Finally, as noted on the cover, this will be an evolving document. The most up-to-date version of this document will always be available on the NACHC COVID-19 webpage and Noddlepod. (If you or a colleague would like access to Noddlepod, please email Susan Hansen at shansen@nachc.org.)

# Cashflow Options for Health Centers With Less than 500 Staff during the Covid-19 Crisis

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|  | **What is it?** | **Who is eligible?** | **What are the terms?** | **What to do?** |
| **Paycheck** **Protection Loans** | Federally guaranteed loans. For any aspect of employee compensation, as well as mortgage, rent, and utilities. May take out up to 2.5 months of payroll up to $10 million.  | Health centers up to 500 employees. | Payments and interest deferred for 6 months to 1 year. After that, 1%. Principal may be fully forgivable with documentation. No fees. | Call your bank or find SBA-approved lenders in your area through SBA’s [Lender Match](https://www.sba.gov/funding-programs/loans/lender-match) tool. call your local [Small Business Development Center](https://www.sba.gov/tools/local-assistance/sbdc/)  |
| **Emergency** **Paid and Family Leave** | Paid leave: Up to 80 hours of paid sick leave to $511/day. For caregiver leave, 80 hours to $200/day. Family leave: 10 weeks at $200/day max. To care for a child whose school or care provider is unavailable. | Employers with under 500 employees must offer. Exceptions available for health centers and firms under 50 employees.  | Employers receive a refundable tax credit for 100% of the eligible leave costs. Credit applied as refund against employer’s total portion of Social Security taxes for the period. Health care employers may deny leave to all employees. | [General information on leave programs](https://www.dol.gov/agencies/whd/pandemic/ffcra-employer-paid-leave) [Questions and answers on leave provisions](https://www.dol.gov/agencies/whd/pandemic/ffcra-questions)  |
| **Economic Injury Disaster Loans** | Small Business Administration (SBA) loan for up to $2 million, including a $10,000 grant up front. May be used to pay fixed debts, payroll, accounts payable and other bills that can’t be paid because of the disaster’s impact. | All health centers, regardless of size.  | Interest rate of 2.75%, payable over up to 30 years. Can defer initial payments for up to a year.  | Apply directly at the SBA. Applicants may [apply online](https://disasterloan.sba.gov/ela/) or call 1-800-659-2955. |
| **Tax credits for employee retention**  | Refundable credits of up to $5,000 per quarter for each employee who is not actively “providing services” due to COVID-19. | All employers who can demonstrate financial harm  | Employee must be unable to “provide services” due to COVID-19. Unclear if reassigned employees qualify. | Either deduct credit from tax deposits or request an IRS advance using [Form 7200](https://www.irs.gov/forms-pubs/about-form-7200) |
| **Deferral of employer share of FICA** | Employers can defer paying the employer share of FICA taxes from now through 12/31/20. | All employers | All deferred FICA taxes must ultimately be repaid – half by 12/31/21 and half by 12/31/22. | See [IRS Notice 2020-22](https://www.irs.gov/pub/irs-drop/n-20-22.pdf) |
| **Accelerated Medicare Payments** | FQHCs can receive up to 3 months’ worth of Medicare payments in advance, within 7 days of applying. | All health centers | Any excess must be repaid within 4 to 7 months. | Contact your MAC |
| **Expanded****Unemployment Insurance for Fully and Partly Laid-off Staff** | Expanded benefits for laid-off staff, including first week paid, additional $600 per week, and 13 additional weeks if needed. States encouraged to create/ expand programs to staff who have been partly or fully furloughed  | All employees and contractors. May be additional state flexibilities.  | Details vary significantly by state. CHCs that self-insure for UI will be reimbursed for half their costs; CHCs that pay state UI taxes may not have their taxes increase due to employees receiving COVID-19-related UI.  | Contact your state [unemployment office](https://www.careeronestop.org/LocalHelp/UnemploymentBenefits/find-unemployment-benefits.aspx).  |

# Paycheck Protection Program (PPP) Loans

*Currently available only to employers with less than 500 employees*

The [Coronavirus Aid, Relief, and Economic Security (CARES) Act](https://www.congress.gov/bill/116th-congress/house-bill/748/text), signed into law on March 27, 2020, sets aside $349 billion for small businesses, including health centers. CARES allows health centers with less than 500 employees to take out federally guaranteed loans through commercial banks, and may be fully forgivable provided that health centers can demonstrate that the funds were used as intended.

*Who qualifies?*

Small businesses - including health centers, PCAs, HCCNs, and NTTAPs - with up to 500 employees.[[2]](#footnote-2) While employers in the hospitality and food industries are permitted to count employees on a per-site basis, this flexibility does not extend to health care providers.

*What are the terms?*

* Loans may cover any aspect of employee compensation, as well as mortgage[[3]](#footnote-3), rent, and utilities incurred between February 15, 2020 and June 30, 2020.
	+ Payroll costs for an individual employee are limited to $100,000 per year, prorated for the period of the loan.
* The amount any small business is eligible to borrow is 250 percent of their average monthly payroll expenses (subject to the limit above), up to a total of $10 million. This amount is intended to cover 8 weeks of payroll expenses and any additional amounts for making payments towards debt obligations.
* Maximum interest rate is 1%, with no fees. (While the statute allowed a maximum interest rate of 4%, on April 2 the Department of the Treasury set the rate at 1%.)
* Payroll costs include employee salaries (up to an annual rate of pay of $100,000), hourly wages and cash tips, paid sick or medical leave, and group health insurance premiums.
* Requires lenders to defer all payments including principal, interest, and fees for no less than 6 months and no more than 1 year.
* If you received an EIDL loan related to COVID-19 between January 31, 2020 and the date at which the PPP becomes available, you may refinance the EIDL into the PPP for loan forgiveness purposes. However, you may not take out an EIDL and a PPP for the same purposes. Remaining portions of the EIDL, for purposes other than those laid out in loan forgiveness terms for a PPP loan, would remain a loan.
* If you took advantage of an emergency EIDL grant award of up to $10,000, that amount would be subtracted from the amount forgiven under PPP.

*About loan forgiveness*

* The loan amounts will be forgiven as long as:
* The loan proceeds are used to cover payroll costs, and most mortgage interest, rent, and utility costs over the 8-week period after the loan is made; and
* Employee and compensation levels are maintained. Due to likely high subscription, it is anticipated that not more than 25% of the forgiven amount may be for non-payroll costs.
* Borrowers will work with lenders for any documentation. The amount of principal that may be forgiven is equal to the sum of expenses for payroll, and existing *interest payments* on mortgages (but not principal), rent payments, leases, and utility service agreements.
* If you to use the Paycheck Protection Program for other business-related expenses, like inventory, you can, but that portion of the loan will not be forgiven.
* If your total payroll expenses on workers making less than $100,000 annually decreases by more than 25 percent, loan forgiveness will be reduced by the same amount. If you have already laid off some employees, you can still be forgiven for the full amount of your payroll cost if you rehire your employees by June 30, 2020.

*How do I apply?*

* Call your bank or find SBA-approved lenders in your area through SBA’s [Lender Match](https://www.sba.gov/funding-programs/loans/lender-match) tool. For help, call your local [Small Business Development Center](https://www.sba.gov/tools/local-assistance/sbdc/).
* To date, health centers have generally had more success working with smaller, regional banks – particularly those with whom they have an existing relationship – than with the larger national banks.

*Is there a deadline for applying?*

Theoretically, the PPP program is available until June 30, 2020. However, the program is disbursing funds on first-come-first-served basis, and within 5 days of starting to accept applications, the SBA was expressing concerns about running out of funds. Congress is currently discussing the possibility of adding more funds.

*What NAICS code should we use in our application?*

The recommended NAICS code for FQHCs applying for SBA loan programs is 621498. The best code for PCAs is probably 813910. The descriptor is on the bottom of page 587 [here.](https://protect-us.mimecast.com/s/MHIPCOY2DyI0WzrsEys5n)

*Any other suggestions?*

The statute creating the Paycheck Protection Program indicates that applicants like health centers should receive priority in the process and disbursement of PPP Loans.  However, it appears that the SBA has not informed lenders about this priority, and therefore most lenders are not aware of it.  NACHC has already reached out to the SBA to insist that they inform lenders of these prioritization requirements ASAP.  However, given how quickly this program is being implemented, health centers applying for PPP loans may want to alert lenders themselves.  To assist with this, both the NACHC webpage and Noddlepod contain a letter to the SBA, which outlines both:

* the language in the PPP law outlines the criteria for which borrowers get priority, and
* the language from Section 330 that demonstrates that health centers meet these criteria.

Health centers may want to attach this letter to their applications, to ensure that lenders are informed that they should receive priority.

*Where can I get more information?*

The Treasury Department has issued a [Fact Sheet](https://home.treasury.gov/system/files/136/PPP--Fact-Sheet.pdf) on the Paycheck Protection Program

# Emergency Paid Sick Leave and Emergency Family Leave

[The Families First Coronavirus Response Act](https://www.congress.gov/bill/116th-congress/house-bill/6201) (FFCRA), signed into law on March 18, created two new temporary types of emergency leave for workers impacted by COVID-19. This leave became effective on April 1, 2020. The Department of Labor (DOL) is overseeing this program.

*Which employers must offer this type of leave?*

In general, employers with fewer than 500 employees are required to offer these two types of leave. However, two types of businesses can choose to be exempted:

* Businesses with less than 50 employees.[[4]](#footnote-4)
* Health care employers, such as health centers.

Note that, per a DOL policy announced on March 29, health care employers can choose to deny Emergency Leave to all their employees, not just those who are health care providers.

*What are the terms?*

* **Emergency Paid Sick Leave:** Two weeks (up to 80 hours) of paid sick leave at the employee’s regular rate of pay (up to $511/day) where the employee is unable to work because they are quarantined by a doctor or government authorities and/or experiencing COVID-19 symptoms and seeking a medical diagnosis. For employees who need to care for someone else, employers must offer two weeks of paid sick leave at two-thirds the employee’s regular rate of pay (up to $200/day). Employers are not required to pay more than the capped amounts.
* **Emergency Family Leave:** Up to an additional 10 weeks of paid expanded family leave, with employers not required to pay more than $200 per day and $10,000 in total. The only employees who are eligible are those who are unable to telework ***and*** who have a child under age 18 whose school or childcare provider is closed or unavailable due to COVID-19.

*Who pays for Emergency Paid Sick Leave and Emergency Family Leave?*

Employers must pay for their employees for this leave. However, the Federal government will reimburse them for the full costs of the required leave, through refundable credits on the employer share of Social Security payroll taxes. Employers deduct the amount they paid for this leave from their payroll tax contributions on an employee’s pay and submit documentation. The credits will cover the capped salary amounts described above, as well as the employer’s health insurance premiums.

*Where can I learn more?*

NACHC has developed a health center-specific guidance document, for the leave programs and other human resources considerations, accessible [here](https://cdn1.digitellinc.com/uploads/nachc/articles/4965843c8da3ec3ab1ab91620cd9bae8.pdf). General information on FFCRA leave from the Department of Labor is found [here](https://www.dol.gov/agencies/whd/pandemic/ffcra-employer-paid-leave), and questions and answers from the Department of Labor on how the FFCRA leave provisions work can be found [here](https://www.dol.gov/agencies/whd/pandemic/ffcra-questions).

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| ***Mandatory Paid Leave Under Families First Coronavirus Response Act****Current as of 3/25/2020* |
|  |  |  |  |  |
|   | **Emergency Paid Sick Leave**  | **Emergency Family Medical Leave**  |
| **Which EMPLOYERS must offer this leave** | All employers with fewer than 500 employees  |
| **Which EMPLOYEES are eligible:** | Employees who are ***sick or under quarantine themselves*** | Employees who are ***caring for a family member or child*** who is sick, quarantined, or whose school/ childcare is closed | Employees who have a ***child under 18*** whose school or childcare is closed AND who are unable to telework. |
|  | Minimum tenure to be eligible | No minimum | No minimum | 30 days |
| **MAXIMUM days and dollar amounts (that employers must provide and the Federal government will reimburse)** |
|  | Maximum number of days | 10 days (for a full-time FTE) | 10 days (for a full-time FTE) | 12 weeks |
|  | Maximum amount per day | The lesser of $511 or the employee's regular daily rate | The lesser of $200 or two-thirds of the employee's daily rate | The first 10 days may be unpaid (or employee may choose to use other types of leave.) For the remaining 50 days, maximum is the lesser of $200 or two-thirds of the employee's daily rate |
|  | Maximum Total Amount | $5,110  | $2,000  | $10,000  |
| **Potential EXCEPTIONS** |   |   |
|  | Employers | US Dept. of Labor may exempt some employers with fewer than 50 employees |
|  | Health care employees | As of 3/29, health centers can choose to deny emergency sick leave to all employees (not just clinical staff.) PCAs & HCCNs cannot deny this leave | Both employers and the US Dept of Labor can choose to deny this FML to all health center employees. |
| **How employers get REIMBURSED** | Employers receive a refundable tax credit equal to 100% of the eligible leave costs described above. The tax credit is applied against an employer’s total portion of Social Security taxes for the period, and is refundable.  |
|  |   |   |   |   |

# Economic Injury Disaster Loans (EIDLs)

The [Coronavirus Preparedness and Response Supplemental Appropriations Act](https://www.congress.gov/bill/116th-congress/house-bill/6074), signed into law on March 6, 2020 makes low-interest loans and emergency grants available immediately and directly through the [Small Business Administration](https://www.sba.gov/disaster-assistance/coronavirus-covid-19) for health centers that are experiencing substantial economic distress due to COVID-19.

*Who qualifies?*

As private non-profits, all health centers ***regardless of size*** are eligible under the expanded criteria. Expanded eligibility criteria and emergency grants are only available between January 31, 2020 and December 31, 2020.

*What are the terms?*

* Up to $2 million in loan principle assistance.
* When you apply you can request an emergency grant advance of $10,000. The advance does not need to be repaid under any circumstance.
* Grant may be used to keep employees on payroll, to pay for sick leave, meet increased production costs due to supply chain disruptions, or pay business obligations, including debts, rent, and mortgage payments. Money will be available within 3 days of applying.
* May be used to pay fixed debts, payroll, accounts payable and other bills that can’t be paid because of the disaster’s impact.
* The interest rate for non-profits is 2.75% and repayment terms are flexible up to 30 years.
* Loans are eligible for 12 months of deferment of principle and interest.

*How do I apply?*

Apply directly [through the SBA](https://www.sba.gov/disaster-assistance/coronavirus-covid-19). Applicants may [apply online](https://disasterloan.sba.gov/ela/) or call 1-800-659-2955. Questions on the program can be referred to: disastercustomerservice@sba.gov, or at the number above.

# Tax Credits for Employee Retention

Section 2301 of the CARES Act provides a refundable payroll tax credit for certain wages paid to employees who are not able to “provide services” due to COVID-19. This program, along with ability to defer certain employment taxes (as established under Section 2302 of CARES), are designed to encourage employers to continue paying wages to employees even when they are unable to perform their regular duties.

*Who is eligible?*

All employers are eligible -- regardless of size – provided that:

* they did not receive a Paycheck Protection Program Loan or Small Business Interruption Loan, and
* during the quarter for which they are seeking the credit, either:
	+ Their operations were fully or partially suspended as a result of orders from a governmental authority limiting commerce, travel, or group meetings due to COVID-19, or
	+ Their gross receipts for the quarter were less than 50% of the gross receipts for the same calendar quarter in the prior year. The employer will remain eligible for the credit until the quarter when their gross receipts equal 80% of the gross receipts for the same calendar quarter in 2019.

*What is the net value of the credit?*

An employer can receive a maximum credit of $5,000 for each eligible employee during each qualifying quarter. The credit is equal to 50% of “qualified wages” paid to employees during a quarter, capped at $10,000 of “qualified wages.” The credit is available for wages paid from March 13 to December 31, 2020.

*What are “qualifying wages”?*

For employers with over 100 full-time employees, the tax credit is available only for wages paid to employees who are ***not providing services*** due to the suspension of operations or decline in gross receipts. “Not providing services” has not yet been defined, so it is unclear if staff who have been reassigned to different duties would qualify. “Qualified wages” include health plan expenses, but not wages for which an employer is taking another tax credit (e.g., tax credit for sick or family leave under FFCRA.)

*How to claim the credit*?

Per IR 2020-62 (dated March 31, 2020), employers can immediately recoup their refundable tax credits by reducing their total federal tax deposit amount from ***all*** employees (not just from those who are receiving wages that qualify for the credit) by the amount of eligible credit. Specifically, employers can deduct the amount of tax credit from: (1) federal income taxes withheld from all employees’ pay; (2) the employees’ share of Social Security and Medicare taxes; and (3) the employer’s share of Social Security and Medicare taxes. These credits will ultimately be reconciled against the total tax liabilities when employers file their quarterly Form 941 or other employment tax returns.

*Is there a faster way to get the credit?*

Perhaps. Employers can request an advance on these credits by using the new [Form 7200](https://www.irs.gov/forms-pubs/about-form-7200), Advance Payment of Employer Credits Due to COVID-19. The IRS is supposed to process the advances within two weeks of receiving a Form 7200. However, the IRS’ system does not yet appear to be fully operational, and it is unclear when it will be up and running. To maximize cash on hand, health centers should consider whether they might be better off offsetting their accumulated tax credits from their upcoming payroll deposits, or requesting an advance on [Form 7200](https://www.irs.gov/forms-pubs/about-form-7200).

# Deferral of Employer Share of Social Security Taxes

Section 2302 of the CARES Act allows employers to defer payment of the employer portion of Social Security taxes that would otherwise be due from March 27 through December 31, 2020, without penalty or interest charges. Employers must pay 50% of the deferred amount by December 31, 2021, and the remainder by December 31, 2022

*Who is eligible?*

All employers are eligible for this deferral, for all of their employees. (However, employers who also receive a Paycheck Protection Program loan may lose the ability to defer these payments if their PPP loan is forgiven.)

*Is this a tax credit, or just an extension of the due date?* Simply an interest-free and penalty-free extension of the due date. All taxes owed must eventually be paid.

*Which taxes can we defer?*

You can defer the employer portion of Social Security taxes that would otherwise be due from March 27 through December 31, 2020, without incurring penalties or interest charges.

*How long is the due date extended for?*

Health centers must pay:

* 50% of the deferred amount by December 31, 2021, and
* the remaining 50% by December 31, 2022.

*How does this provision interact with the $5,000 tax credit for employees who cannot “provide services”?*

A lot of these details are not yet clear. At the moment, it appears that an employer could defer its deposit of payroll taxes that are otherwise due from March 13 to December 31, 2020 (using this provision) and offset against those un-remitted payroll taxes the employee retention credit (under Section 2301 of the CARES Act.) That would reduce the amount that the employer would eventually need to remit (i.e., 50% of the net amount would be owed on December 31, 2021, and the remainder would be owed on December 31, 2022).

*Where can we get more information?* See [IRS Notice 2020-22](https://www.irs.gov/pub/irs-drop/n-20-22.pdf) , dated March 31, 2020.

# Accelerated Medicare Payments

*Who qualifies?* All health centers that have billed Medicare within the past six months.

*What are the terms?*

* FQHCs can receive up to three months’ worth of their average Medicare revenues in advance.
* Funds should be received within seven calendar days of submitting a request to your MAC.
* Repayment of any excess funds will not begin until 120 days after payment is received.

*How do I access these benefits?* Contact your Medicare Administrative Contractor (MAC.)

*Where can I get more information?* See this [*CMS Fact Sheet on advanced payments.*](https://www.cms.gov/files/document/Accelerated-and-Advanced-Payments-Fact-Sheet.pdf)

# Expanded Unemployment Insurance for Fully or Partially Laid-Off Employees

Recent legislation grants states more flexibility in paying Unemployment Insurance (UI) to individuals impacted by COVID-19, and nearly all states have issued guidance specifying how they have expanded their UI programs to cover these employees. However, not all states have expanded UI benefits to the same extent, and there are variations in each state with respect to factors such as furloughs, charge-back rates to employers, and how UI benefits interact with paid leave. Therefore***, it is critical to check with your state Unemployment Insurance (UI) office to determine which benefits apply in your state, and how.***

*Which individuals are eligible for the expanded UI benefits due to COVID-19?*

States now have more flexibility in paying UI benefits when:

* An employer temporarily ceases operations due to COVID-19, preventing employees from working;
* An individual is quarantined with the expectation of returning to work after the quarantine is over; and
* An individual leaves employment due to a risk of exposure or infection or to care for a family member.

*What expanded UI benefits are available nationally to all applicants impacted by COVID-19?*

Eligible individuals will receive:

* Payment for the first week of approved unemployment, covered fully by the Federal government. (Most states typically provide no UI payment during the first week.)
* An additional $600 per week, on top of ordinary state-authorized weekly benefits, through July 31, 2020. It is expected that this benefit will be added to all payments issued starting the week of April 12-18 and will be added to all Unemployment Insurance benefit payments for weeks of unemployment beginning Sunday, March 29, 2020 and ending no later than July 31, 2020. However, states are still waiting for guidance from the US Department of Labor for details.
* An additional 13 weeks of pandemic emergency unemployment compensation, if they exhaust their initial 26 weeks, up to a maximum of 39 weeks for the period January 27 through December 31, 2020. This extension is call “Pandemic Unemployment Emergency Compensation.”
* Some benefits may be available retroactively.

*What expanded UI benefits may be available, based on your state?*

* States are encouraged to establish or expand “short-time compensation programs.” These programs –also known as “work sharing” programs -- provide employees whose hours have been reduced with a pro rata portion of the UI they would have received if fully laid off. Often, such programs require employers to submit short-time compensation plans to the state for approval before employees are able to take advantage of such a benefit.
* Many states are now offering UI payments to staff who have been furloughed – fully or partly -- due to COVID-19. (Typically, UI is restricted to individuals who have been terminated/ laid-off, which is considered more permanent than a furlough.)

*What will this cost?*

**It depends on your state, and also whether your organization pays State Unemployment Taxes (SUTA) or self-insures for unemployment costs.**

* ***For employers that pay State Unemployment Taxes (SUTA):*  In some states (e.g., DC, IA, ME, VT)** benefits paid for reasons related to COVID-19 will not be charged to an employer’s experience rating – meaning that their UI contributions should not increase. However, other states like Delaware have made clear that they will not exclude COVID-19 claims from employer experience ratings, meaning employers could see an increase in their unemployment tax rate. Many other states have not yet provided any guidance on this issue.
* ***For non-profit employers that self-insure for unemployment:*** These employers will be reimbursed for half of their costs of benefits provided to their laid-off employees.

Finally, Paycheck Protection loan forgiveness eligibility amounts will be reduced according to reductions in payroll from employees that seek COVID-19-related UI benefits.

*How do we learn more about these benefits?*

Contact your state [unemployment office](https://www.careeronestop.org/LocalHelp/UnemploymentBenefits/find-unemployment-benefits.aspx).

1. All programs which are open to health centers with fewer than 500 employees are also open to PCAs, HCCNs, and NTTAPs with fewer than 500 employees. [↑](#footnote-ref-1)
2. Under the CARES Act, the term ‘employee’ includes individuals employed on a full-time, part-time, or other basis. It is not by FTE. [↑](#footnote-ref-2)
3. Note that while funds used to pay *interest* on a mortgage can be forgiven, funds used to pay mortgage *principal* cannot. [↑](#footnote-ref-3)
4. Under the CARES and FFCRA , the term ‘employee’ includes individuals employed on a full-time, part-time, or other basis. It is not by FTE. [↑](#footnote-ref-4)