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PERSPECTIVES
WINTER 2005-2006 PUERTO RICO

EMPLOYERS FACE SIGNIFICANT INCREASE IN CHRISTMAS BONUS AND SEVERANCE PAYMENTS

by: Karen Morales Ramírez

The Governor of Puerto Rico recently signed Act No. 124 of September 29, 2005 ("Act 124") and Act No. 128 of October 7, 2005 ("Act 128"). Act 124 gradually triples the amount of the statutory annual bonus payable to private sector employees in a period of three years; Act 128 increases the amount of statutory unjust dismissal indemnity.

Act 124 amended Act No. 148 of June 30, 1969, known as the Annual Bonus or Christmas Bonus Act. Prior to the amendment, Act 148 provided, in essence, that an employer who employed one or more employees within a period of 12 consecutive months comprised from October 1 of any calendar year until September 30 of the subsequent calendar year, had to pay employees who had worked 700 hours or more, or 100 hours or more in the case of dock employees, a bonus equivalent to 2% of their annual compensation (up to $10,000). Thus, covered employees who earned at least $10,000 per year, would be entitled to a maximum Christmas Bonus in the amount of $200.

However, since the enactment of Act 148 in 1969, the amount of the Christmas Bonus had not been revised and thus its acquisitive value had been significantly reduced by inflation.

Act 124 establishes that, in the case of employers with more than 15 employees, the minimum amount of the Christmas Bonus payable to covered employees will increase to 3%, 4.5% and 6% of their annual compensation (up to $10,000), for 2006, 2007 and 2008, respectively. Thus, covered employees who earn at least $10,000 per year, will be entitled to a Christmas Bonus of $300 in 2006, $450 in 2007 and $600 in 2008. In the case of employers with 15 or less employees, the amount of the Christmas Bonus will increase to 2.5%, 2.75% or 3%, for 2006, 2007 and 2008, respectively.

Act 128 amended Puerto Rico's Unjust Dismissal Act, Act No. 80 of May 30 1976 ("Act 80"). Previously, Act 80 provided that an employee hired for an indefinite period of time who was discharged without just cause was entitled to one month of salary if the employee had less than five years of service; or two months of salary if the employee had at least five, but less than 15 years of service; or three months of salary after 15 years of service. Act 80 also provided for an additional progressive compensation of one week of salary for each year of service.

Act 128 increases the amount of the statutory unjust dismissal indemnity, commonly known as "severance pay" ("mesada"). Among the reasons given

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by the Puerto Rico Legislature for this increase was the fact that in recent years, private employers were allegedly incurring in the practice of discharging, without cause, employees that had 15 years or more of service with the employer. It was also alleged that it was more cost effective for the employer to discharge employees and pay the severance indemnity rather than to continue paying the employees' high salaries due to their years of service with the company and their upcoming retirement. Thus, according to the legislature, the remedy provided by Act 80 was inadequate.

Act 128 provides that any employee hired for an indefinite period of time and discharged without just cause will be entitled to the following:

(i) two months' of salary if the employee has less than five years of service; or three months' of salary if the employee has at least five but less than 15 years of service; or six months' of salary after 15 years of service; plus

(ii) an additional progressive compensation of one week of salary for each year of service if the discharge occurs within the first five years; or two weeks of salary for each year of service if the discharge occurs after five years and before 15 years of service; or three weeks of salary for each year of service if the discharge occurs after completing 15 or more years of service.

Furthermore, Act 128 modifies the preliminary steps that a court may take in order to expedite the judicial proceedings under Act 80. Previously, the court could schedule a pretrial conference 30 days after the employer filed its answer to the complaint. Also, the court could order the employer to deposit, within a term of 15 days after the conclusion of the pretrial, a sum equal to the total compensation the employee would be entitled to, in the event the employer prevailed in the unjust dismissal claim, plus an amount of attorneys' fees of no less than 15% of the total compensation or $100, whichever was greater.

Act 128 establishes that, in judicial proceedings under Act 80, a court may schedule the pretrial conference 20 days after the employer files its answer to the complaint, and within a term of ten days after the conclusion of the pretrial, it may order the employer to deposit a sum equal to the total compensation the employee would be entitled to. The provision of Act 80 related to the amount of attorneys' fees that the employer also has to deposit with the court remained unchanged.

> *"Act 124 establishes that, in the case of employers with more than 15 employees, the minimum amount of the Christmas Bonus payable to covered employees will increase to 3%, 4.5% and 6% of their annual compensation (up to $10,000), for 2006, 2007 and 2008, respectively"*

The Puerto Rico Civil Code provides that laws shall not have retroactive effect unless they expressly provide so. With respect to the applicability of the new calculation of the statutory unjust dismissal indemnity established by Act 128 to claims under Act 80 pending adjudication or filed after the enactment of Act 128, the Puerto Rico Department of Labor Solicitor ("Solicitor") issued Consultation No. 14295 (March 19, 1997) and Consultation No. 14473 (March 18, 1998).

Specifically, the Solicitor was asked whether Act No. 234 of September 17, 1996, ("Act 234") which previously amended Act 80 to increase the statutory unjust dismissal indemnity, applied to claims wherein the unjust discharge occurred before the effective date of Act 234, but which were filed after the effective date of the act. It was alleged that because the new calculation of the severance pay contained in Act 234 was more beneficial to the former employees who had been discharged without cause, they should have been entitled to the benefit of Act 234.

The Solicitor rejected these arguments and concluded that the determining factor as to whether Act 234 applied to those claims, was the date in which the alleged unjust discharge occurred and not the date when the claims were filed. The Solicitor also concluded that because Act 234 expressly provided that it would be effective immediately after its' enactment, it did not have retroactive effect.

Act 128 became effective immediately after its enactment, which was on October 7, 2005. As to claims where the alleged unjust discharge occurred prior to the enactment of Act 128, the calculation of the statutory unjust dismissal indemnity should be the one previously provided in Act 80. Therefore, the new calculation of the statutory unjust dismissal indemnity established by Act 128 will apply to those terminations that occur on or after its effective enactment date, October 7, 2005. ■

WARNING TO PARENT COMPANIES

by: Maggie Correa-Avilés

"The Court stated that "the parent company may be liable for unsafe conditions at a subsidiary only if it assumes a duty to act by affirmatively undertaking to provide a safe working environment at the subsidiary"

On September 15, 2005, the U.S. Court of Appeals for the First Circuit issued a decision in the case of Armando Méndez-Laboy et al. v. ABBOTT Laboratories, Inc., 424 F. 3d 35, (1st Cir. 2005). This decision is of importance to all employers, particularly to those with a dangerous manufacturing process and those with a parent company which exercises control over the process.[1]

Two employees had a work related accident. It occurred when a color solution of Hydrooxypol methyl cellulose phthalate that was in a polyethylene bag was added into a tank that had a water-based mixture of acetone and methanol. The static energy generated by the plastic bag caused a spark, the flammable vapors were ignited and with the oxygen in the tank an explosion was produced. The explosion caused severe burns to the employees. Both employees received medical treatment and accident compensation benefits pursuant to the Puerto Rico Workmen's Compensation Fund.

Thereafter, the employees filed a complaint in the U.S. District Court for the District of Puerto Rico against the employer's parent company ABBOTT Laboratories, Inc. They alleged that the parent company was not insured with the Puerto Rico Insurance Fund; thus, allegedly the parent company was liable under Article 1802 of Puerto Rico's Civil Code as a third party under the Workmen's Compensation Act. The reason for the alleged responsibility of the parent was that because it had established the manufacturing process it was responsible for its execution.

The District Court granted ABBOTT's request for summary judgment claiming the protection of the employer's immunity under the Workmen's Compensation Act extended to the parent. The plaintiffs appealed.

The Court of Appeals concluded that the District Court reached the correct result. It affirmed the summary judgment on different grounds stating that even though the parent designed the manufacturing process, it did not direct nor supervise the process. Furthermore, the parent company did not actively undertake the responsibility of ensuring safety in the manufacturing procedure. Citing the prior decision of Muñiz v. National Can Corp., 737 F. 2d 145, 148 (1st Cir. 1984), the Court stated that "the parent company may be liable for unsafe conditions at a subsidiary only if it assumes a duty to act by affirmatively undertaking to provide a safe working environment at the subsidiary."

In view of this decision, it is advisable that any subsidiary corporations in Puerto Rico be primarily responsible for the execution of any process in the workplace. The local subsidiaries are immune from suit related to a work accident as the insured employer. The parent company, which does not do business in Puerto Rico, is not the insured employer. The parent must be careful not to exert control or supervision of the manufacturing process or could be liable for the damages caused by a work-related accident. ■

[1]. The plaintiffs also filed a complaint in the Puerto Rico Court of First Instance against the employer. That complaint was dismissed because the employer was insured. As such, it was immune from suit for the damages resulting from a work accident covered by the Puerto Rico Workmen's Compensation Act.

USE OF CONVICTION RECORDS IN EMPLOYMENT

by: Jorge A. Antongiorgi

Many employers in Puerto Rico are resorting to pre-employment background investigations inquiring about arrest or conviction records of their employment applicants[1]. However, this practice may result in legal exposure for employers, at least in the opinion of half of the judges of the Supreme Court of Puerto Rico, as expressed in the case of Rosario Díaz v. Toyota de Puerto Rico, 2005 T.S.P.R. 154.

In Rosario Díaz, the plaintiff sued Toyota alleging that he was denied employment due to his conviction record. Rosario Díaz was an employment applicant referred to Toyota by the Department of Labor and Human Resources of Puerto Rico for an open position as a driver. At his first interview he was informed by a Toyota representative that he had the necessary requirements for the position. After a second interview, Rosario was informed that he had to provide, among other things, a "Criminal Record Certificate." Rosario provided a certificate which evidenced a past conviction for manslaughter and a violation to the "Weapons Law of Puerto Rico," for which he received a suspended sentence 20 years before the certificate was issued. Although he explained that he tried to eliminate the conviction from his record on account of the time elapsed, it seems that due to a mistake, the conviction had not been eliminated[2]. Toyota had a policy of refusing to hire applicants with conviction records and proceeded to withdraw its employment offer.

Rosario sued Toyota for damages alleging that the employer's basis for refusing to hire him was a discriminatory action prohibited by the Constitution of the Commonwealth of Puerto Rico. Rosario alleged that Toyota discriminated against him on account of his "social condition."

The Court of First Instance of Puerto Rico dismissed Rosario's claim concluding that the plaintiff had failed to demonstrate that the category of former convict was a "social condition" protected by the Constitution. The Court of Appeals of Puerto Rico vacated the judgment concluding that Rosario could assert a "social condition" discrimination claim. Toyota requested that the Puerto Rico Supreme Court review this judgment. However, the Supreme Court issued a split decision on the subject. As a result, the judgment of the Court of Appeals was upheld, and the judgment of the Court of First Instance remained vacated, for which reason, the case was remanded to the Court of First Instance.

It is important to note that three Supreme Court justices concluded that, under the Constitution, former convicts enjoy protection from discriminatory actions; in particular, they are protected against discrimination based upon their social condition. Under the context of this expansive view, employment actions based upon past criminal records would be a form of discrimination due to social condition, thus, prohibited by the local Constitution.

"It is important to note that three Puerto Rico Supreme Court justices concluded that, under the Constitution, former convicts enjoy protection from discriminatory actions; in particular, they are protected against discrimination based upon their social condition"

However, even under the rationale expounded by these three justices, the use of conviction records by an employer is not absolutely banned. According to these justices, an employer may consider an applicant's conviction record in order to determine whether the candidate is unfit for a job, subject to the following considerations:

1. the nature and seriousness of the crime;
2. the relation, if any, between the crime, the position sought, and the job requirements;
3. whether the applicant has been rehabilitated;
4. the circumstances surrounding the crime, including the existence of extenuating circumstances;
5. the subject's age at the time of the commission of the crime;
6. the length of time intervening between the conviction and the application for employment;
7. whether the employer has a legitimate interest in the protection of his property, security, and welfare, or that of third parties.

Only after due consideration of those factors, and after concluding that the conviction record disqualifies the applicant, according to these justices, would an employer's refusal to hire be justified based on the applicant's record of convictions. Additionally, pursuant to this thesis, the employer may allege, as a defense against claims based on discrimination, that after due analysis of the aforementioned factors, it concluded that the employment of the applicant could expose the employer or the community to excessive risk, for which reason its refusal to hire was justified.

Finally, the absence of a Court opinion in Rosario Díaz, does not render valid the unfettered practice of using conviction records. Employers should be aware of the fact that the Equal Employment Opportunity Commission ("EEOC") has, throughout the years, issued statements regarding the use of arrest and conviction records in employment decisions[3]. In general, due to the potential adverse impact on minorities, an employer may not base an employment decision, in the absence of a business necessity, on an applicant's conviction record. This business necessity may be established by considering the particular conduct and its relation to the employment position. In determining whether a conviction may render an applicant unfit for the position, the employer should take into consideration criteria very similar to that established by the three justices of the Supreme Court in the case of Rosario Díaz: the nature and seriousness of the crime, the time that has passed since the conviction, and the nature of the particular job. In this regard we also recommend that valid conviction records be requested and considered before an employment offer is made. These records should be evaluated in conjunction with other hiring criteria so as to avoid basing a rejection in the conviction record, whenever possible. ■

[1]. Under the general principles of civil law, an employer may be liable for any damages caused to third parties by the employees in its service. One basis for such liability is the employers' "actual fault in the unwise selection of the[ir] subordinates". Cordero Santiago v. Lizardi Caballero, 89 P.R.R. 148, 150 (1963). Under this scenario, an employer will not be liable when it proves that it exercised reasonable care and acted with diligence in recruiting the employee.

[2]. A felony conviction may be eliminated from a record once the term of ten years since the conviction has elapsed. See 34 L.P.R.A. § 1731.

[3]. See "Policy Guidance on the Consideration of Arrest Records on Employment Decisions Under Title VII," Notice Number 915.061.

"The employer may allege, as a defense against claims based on discrimination, that after due analysis of the aforementioned factors, it concluded that the employment of the applicant could expose the employer or the community to excessive risk, for which reason its refusal to hire is justified"

U.S. SUPREME COURT'S NEW DECISION ESTABLISHING COMPENSABLE ACTIVITIES

by: Juan Felipe Santos

On November 8, 2005, the United States Supreme Court unanimously held in the case of IBP, Inc. v. Alvarez, et al. (03-1238) consolidated with Tum, et al. v. Barber Foods, Inc. (04-66), 543 U.S. ___ (2005), the following:

- The time employees spend walking from the locker rooms or changing area to the production area after donning protective gear or clothes at the beginning of the work shift is compensable under the Fair Labor Standards Act, as amended ("FLSA");
- The time employees spend walking from the production area to the locker rooms or changing area before doffing the protective gear or clothes at the end of the work shift is compensable under the FLSA;
- The time employees spend waiting to doff the gear at the end of the work shift is compensable under the FLSA; and
- The time employees spend waiting to don the first piece of gear at the beginning of the work shift is not compensable under the FLSA.

Prior to this decision, there was a split between the Courts of Appeals for the First[1] and Ninth Circuits as to whether this type of "walking time" was compensable under the FLSA. The First Circuit previously determined that the "walking time" in question was not compensable while the Ninth Circuit held that it was. However, both courts had previously decided that the donning and doffing of protective gear or clothes is an "integral and indispensable" part of the employees' principal activity for which they were primarily hired. As such, the donning and doffing were held to be "principal activities" of their employment as well and thus compensable under the FLSA.[2] Consequently, according to the "continuous workday rule,"[3] the Supreme Court held that everything that occurs after the beginning of the employee's first principal activity (donning) and before the end of the employee's last principal activity (doffing) during the same workday is compensable as well.

Along the same line, the Supreme Court concluded that the locker rooms where the special gear is donned and doffed are a relevant "place of performance" of the principal activity that the employee performs. Accordingly, the "walking time" from the locker rooms to the production area and from the production area to the locker rooms is compensable.

As to the "waiting time," the Supreme Court held that the time employees spend waiting to don the first piece of gear that marks the beginning of the continuous workday is not compensable.[4] That is so because the workday is not considered to have commenced yet. However, the time spent waiting to doff the gear at the end of the work shift is compensable under the FLSA.

The Supreme Court ruling leaves many unanswered questions and creates uncertainty in certain employers' common compensation practices as well; for example:

- The Supreme Court did not specifically address the amount of time that may qualify as "de minimis" so as to exclude the employer from payment under the FLSA;[5]
- Neither does the decision take into consideration nor present a solution to the practical difficulties of recording the time employees spend chatting with each other, reading the newspapers, going to the restroom, among other scenarios, after donning the protective gear in the changing area but before entering into the production area;

- Implications in compensation practices for employers in environments other than poultry and meat processing industries[6], such as, pharmaceutical, medical devices, and electronics industries, hotels and companies with employees who work remotely;

- When the workday starts;

- What other activities may trigger the compensable workday.

If you have any questions, or wish additional information regarding the implications of this important decision to your work place, please contact any of the attorneys at the Labor and Employment Law Department of McConnell Valdés. ■

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[1]. This appellate court reviews the decisions made by the United States District Court for the District of Puerto Rico.

[2]. The Supreme Court agreed as well with this analysis.

[3]. The "continuous workday rule" means that everything that occurs throughout the period between the commencement and completion on the same workday of an employee's principal activity or activities is compensable. Additionally, under this rule, there is no room for interruptions of compensable activities for non-compensable activities.

[4]. However, the Supreme Court pointed out that its analysis would be different if the employer requires its employees to arrive at a particular time in order to begin waiting.

[5]. An activity may be considered "de minimis" if it requires little time to perform.

[6]. These were the industries considered by the Courts in IBP, Inc. v. Alvarez et als., and Tum, et al. v. Barber Foods, Inc., supra.

SALARY SCALE INCREASES FOR NURSES IN THE PUBLIC SECTOR

by: Chloé S. Georas

Puerto Rico's Act No. 28 of July 19, 2005 ("Act 28") establishes a salary scale applicable to nursing professionals in the public sector and proposes a progressive plan to adjust the current salary scale over a period of time.

The Legislature's intent is to counteract the massive exodus of nursing professionals from Puerto Rico to the United States. The current salary scale for professional nurses in the public sector is one of the lowest when compared to that of the different states of the United States. As a result, there is a constant displacement of nurses to the United States in search of better salaries and working conditions.

The Legislature clearly states that excellent health services are a right rather than a privilege and that this exodus significantly undermines the quality of nursing services in Puerto Rico. The persistent turnover of nurses requires the government of Puerto Rico to constantly hire and train new personnel whose highly specialized nursing education precludes easy recruitment.

Accordingly, the Legislature approved a minimum salary scale based on the academic preparation and experience of nurses. The scale for a full-time work month is as follows:

I	Practical nurses without experience:	$1,500
II	Nurse with an Associate Degree without experience:	$2,000
III	Nurse with Bachelor's Degree without experience:	$2,350
IV	Nurse with Bachelor's Degree with experience:	$2,500

The Secretary of the Department of Health is authorized to establish the procedure by which the government of Puerto Rico will comply with the new salary scale. Salaries of all nursing personnel in the public sector must comply with the new salary scale by July 19, 2007. Moreover, the Secretary of the Department of Health must review the salary scale every five years and make any necessary adjustments.

The Secretary of the Department of Health will fix the salaries for part-time nursing professionals as well as the minimum wage for any other category not included above. They must be in place by July 19, 2008.

This law has a prospective impact; neither contracts entered into prior to the law's approval, nor collective bargaining agreements in force on the date of the law's approval, will be affected by the law.

A controversy has arisen as to whether the statute is clear as to the time frame for the implementation of the new salary scale in the public sector. Namely, the issue is whether the increases should be made immediately, gradually or at the end of the deadline imposed by the Legislature.

Although Act No. 28 does not encompass the private sector, the Legislature believes that the private sector will follow the salary increase in the public sector by default, in order to compete favorably in the recruitment process of the best nursing personnel. Private employers may wish to consider implementing the salary increases in their operational budgets for forthcoming fiscal years.

In addition, on July 20, 2005, the Governor approved Act No. 26. This law amends Act No. 86 of July 2, 1987; it creates the College of Licensed Practical Nursing of Puerto Rico (the "College"). 20 L.P.R.A. §235 et seq. The legislative intent of these amendments is to respond to the changing needs and best interests of the College´s 19,000 active members.

The main amendments clarified that practical nurses must be mandatory members of the College in order to practice their profession in Puerto Rico, 20 L.P.R.A. § 235d. Also, the penalties for violating the requirement of mandatory membership were made more stringent. 20 L.P.R.A. § 235k.

If you have any questions regarding the laws outlined above and the implications of their enforcement, do not hesitate to contact any of the attorneys of the Labor and Employment Law Department of McConnell Valdés. ■

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