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WASHINGTON STATE EMPLOYMENT SECURITY DEPARTMENT

PFML Phase 4 Formal Rules Hearing

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PUBLIC COMMENTS HEARING

Wednesday, May 29, 2019
9:04 a.m. - 9:27 a.m.
322 North Spokane Falls Court
Spokane, Washington



REPORTED BY:
RACHAEL L. HALL, CCR NO. 3265

1 APPEARANCES:

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FOR THE EMPLOYMENT SECURITY DEPARTMENT:

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MS. APRIL AMUNDSON

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MR. JASON BARRETT

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WASHINGTON STATE EMPLOYMENT SECURITY DEPARTMENT

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Paid Family and Medical Leave Division

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1 SPOKANE, WASHINGTON, MAY 29, 2019, 9:04 A.M.

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3 MR. BARRETT: Pursuant to the authority given
4 under Washington State Law RCW 50A.04.215, Chapter 42.30
5 RCW of the Open Public Meetings Act and Chapter 34.05 of
6 the Administrative Procedures Act, this hearing is
7 hereby convened.

8 For the record, this hearing is being held at
9 9:04 a.m. on May 29th, 2019 at the DoubleTree by Hilton
10 Hotel located at 322 Spokane Falls Court in Spokane,
11 Washington.

12 This hearing is convened to consider testimony
13 concerning Phase 4 of Paid Family and Medical Leave
14 rulemaking. Rules in this phase relate to the
15 continuation of benefits, fraud and other topics related
16 to establishing a program. Notice of this hearing was
17 filed in the Washington State Register on March 13th,
18 2019 as WSR 19-07-035. It was sent to interested
19 parties and was posted online.

20 My name is Jason Barrett and I'm a policy analyst
21 for the Paid Family and Medical Leave Division of the
22 Washington State Employment Security Department. I
23 represent Commissioner Suzi LeVine as the hearing
24 officer presiding at this public rulemaking hearing.

25 We have another staff member from the Paid Family



1 and Medical Leave Policy Team attending this hearing and
2 I will let her introduce herself now.

3 MS. AMUNDSON: Thank you for attending today. My
4 name is April Amundson. I'm the rules and policy
5 manager for Paid Family and Medical Leave. Thank you
6 again for attending.

7 MR. BARRETT: Please be advised that this hearing
8 is being transcribed by a court reporter, and the
9 transcript will become a part of the official rulemaking
10 file. To facilitate this transcription, please state
11 and then spell your name before you give testimony.
12 Please also note that this hearing is convened to
13 consider comments on the proposed rules.

14 Because of the formal nature of the hearing, we are
15 unlikely to answer any questions you may ask. If you do
16 pose a question, I will ask you to rephrase your
17 question as a comment. Questions can also be sent to
18 our online portal, which is managed by the policy team.
19 It can be found by typing bit.ly/commentforum into your
20 browser window.

21 A concise, explanatory statement of the agency's
22 reason for adoption of the rules, including a summary
23 and response to all comments received after the
24 publication of the proposed rules, will be placed in the
25 permanent rulemaking file and posted online. This



1 document will be sent to all interested parties who have
2 signed up to receive Paid Family and Medical Leave
3 e-mails.

4 We will begin this morning with April Amundson who
5 will provide a brief explanation of the proposal.

6 MS. AMUNDSON: Thank you, Jason.

7 The Paid Family and Medical Leave Act was passed by
8 Washington state legislature in 2017. January 1st,
9 2019, employers were able to start assessing premiums on
10 employees' wages. Application for benefits will be
11 accepted beginning January 1, 2020. They have split the
12 rulemaking into phases to align with this aggressive,
13 but achievable schedule. This formal public hearing
14 covers the continuation of benefits, fraud and other
15 topics related to the establishment of this program, as
16 Jason mentioned moments ago.

17 The rules that we're covering today span several
18 different topics including at a high level how the
19 department will determine whether an employee is
20 eligible to receive benefits on an ongoing basis. What
21 happens if an employee's eligibility for benefits is
22 disputed, how frequently employees must file to receive
23 benefits, what information the department needs to
24 determine a claim as well as how an employee can reopen
25 or cancel a claim.



1 In addition, these draft rules contain information
2 about what wages are reportable to the department for
3 premium assessment and how the department will determine
4 fraud. The rules also contain several definitions that
5 will pertain to all Paid Family and Medical Leave rules.

6 I encourage you to read the text of the rules for a
7 more robust understanding. These draft rules are
8 intended to interpret and clarify the Title 50A of the
9 Revised Code of Washington.

10 Thank you for your interest and participation in
11 our rulemaking efforts to implement this important
12 program and we look forward to your comments today.

13 MR. BARRETT: We will now hear testimony from those
14 in attendance. When you testify, please speak into the
15 microphone or phone, state your name, spell your last
16 name and state who you represent if you are here in a
17 representative capacity. Please unmute your phone or
18 step forward to the microphone and testify whenever you
19 are ready.

20 We are now accepting comments for those joining us
21 here in the room or by phone on Phase 4 of Paid Family
22 and Medical Leave rulemaking.

23 MS. ROBERTSON: Marjorie Robertson from Sun Life.
24 Are you going --

25 MR. BARRETT: Marjorie, I'm so sorry to interrupt.



1 Can you just spell your last name for our court
2 reporter.

3 MS. ROBERTSON: I'm sorry, what?

4 MR. BARRETT: Can you please spell your last name
5 for our court reporter?

6 MS. ROBERTSON: Sure. It's R-o-b-e-r-t-s-o-n.
7 This is on the phone so it's a little hard to tell
8 what's happening. Are you going through the regulations
9 number by number, or are you just inviting general
10 comments?

11 MR. BARRETT: We're inviting general comments, so
12 if you have a comment on any of the rules in Phase 4,
13 you may provide that comment at this time.

14 MS. ROBERTSON: Okay. Yes, I do. I have questions
15 almost more than I have comments, which I know you are
16 not -- you may not answer them, but I found the
17 references to the continued claim, successive claim,
18 weekly claim, sometimes it's four consecutive weeks
19 where there's a problem, and then the statute is a
20 four-month gap. I found all of that very confusing, so
21 I had a series of questions about does an employee have
22 to file a weekly claim, which I heard is the ESD's
23 position, and I'm confused by that because I don't see
24 that requirement in the statute.

25 Intuitively, it doesn't make any sense to me



1 because, typically, an employee may get approved for
2 eight weeks of continuous leave, so if they submit the
3 medical certification -- you know, the way that works
4 under the FMLA, that's your claim. It didn't make sense
5 to me that an employee would have to file a weekly
6 claim.

7 And then I didn't know how the minimum claim
8 duration worked. Does that eight consecutive hours have
9 to be met each week before an employee can be paid, and
10 once they meet that eight consecutive hours, can they
11 take leave in any minimum increment they want, or is
12 there a minimum increment of intermittent leave?

13 And then there's a regulation that talks about how
14 an employee must reopen a claim if it's -- for anything
15 within the same claim year, so that almost implies
16 there's only ever one claim that exists for any reason
17 during the benefit year. So I found that confusing.

18 So if you can tell, I'm confused. I set these
19 questions forth a little bit better in the written
20 questions I submitted, but I did have some overall
21 confusion about what claims -- if there are different
22 kinds of claims, are there continued claims because it
23 doesn't really define -- anyway, I'm rambling on.

24 MR. BARRETT: So, Marjorie, thank you so much for
25 your comment. You're saying that the department could



1 possibly do a little bit better in terms of
2 communicating the types of claims, the frequency of
3 claims and how minimum claim duration works.

4 Is that accurate?

5 MS. ROBERTSON: It would be great for me because I
6 think I'm not understanding it, but I also would be
7 interested if it's possible to have a dialogue
8 about -- I don't know if you've already made up your
9 mind about what makes sense. I will tell you that from
10 a voluntary plan point of view, I am an insurer and we
11 have talked with some other insurers and if we do a
12 voluntary plan, we are probably not going to require
13 employees to file weekly claims because it just seems
14 like too much administrative work. So if that's what
15 you're thinking is necessary, that feels like you're
16 going to be creating extra work for yourself that maybe
17 you don't need.

18 MR. BARRETT: Well, we certainly appreciate that
19 feedback, and, perhaps, Marjorie, we can have a
20 discussion offline to hopefully clarify some issues that
21 are causing confusion, and we will also make a point to
22 speak with our communication staff to ensure that this
23 information, once it becomes publicly available, is very
24 clear about the types of claims required and hopefully
25 address these concerns that you have.



1 MS. ROBERTSON: That's fabulous, thank you. I
2 don't mean to complain.

3 MR. BARRETT: We're here to hear complaints as much
4 as compliments, so we appreciate it.

5 MS. RUTLEDGE: Hi. This is Gina Rutledge,
6 R-u-t-l-e-d-g-e. I also had questions on that same part
7 because in -- for the most part in applying for
8 benefits, you get 12 weeks, but most of us know that
9 pregnancy leading into child bonding is probably our
10 biggest event that we're going to see.

11 So examples of how that claim year will work with
12 how it goes to 16 weeks and then 18 weeks would be very
13 important for us to understand. When would the own
14 medical end and when would the child bonding claims
15 begin? Would someone be required to file two separate
16 claims, one for benefits for the medical and one for the
17 paid family. How do they qualify for the 18 weeks?

18 I mean, if someone, you know, had a medical issue
19 at all during the year, you know, there was a
20 complication to the pregnancy, maybe morning sickness
21 that really hit, does that automatically qualify them
22 for 18 weeks? So a little bit more explanation on that
23 would be very helpful. So when the two benefits blend
24 together from pregnancy and cement, even when they blend
25 together for something completely different, how would



1 someone qualify for the 16 weeks? Would that be one
2 benefit with the state or would that be considered two?

3 MR. BARRETT: Great. Thank you so much, Gina. And
4 I do absolutely understand the confusion around how
5 claims work together, and I do want to point out our
6 communications team is putting together a very extensive
7 set of informational documents and Web pages and
8 employee tool kits that will be available later this
9 year that will hopefully address a lot of these
10 concerns, but we do appreciate hearing them.

11 MS. RUTLEDGE: Thank you. Will there be a paper
12 claim or is this all going to be done online or through
13 the telephone?

14 MS. AMUNDSON: That has not been developed yet.
15 We're looking at it online, primarily, and then paper as
16 necessary, but the documents have not yet been
17 developed.

18 MS. RUTLEDGE: Thank you. And I appreciate your
19 time.

20 MS. AMUNDSON: Thank you.

21 MR. BARRETT: We are now accepting further comments
22 for those joining us in the room on Phase 4 of Paid
23 Family and Medical Leave.

24 MS. O'CONNELL: This is Abigail O'Connell from
25 Sun Life. My last name is spelled O, apostrophe,



1 C-o-n-n-e-l-l. And I am confused about the application
2 of the minimum claim period of eight consecutive hours.
3 I'm wondering after the employee hits the eight
4 consecutive hours, are they then allowed to take
5 increments of time in less than eight-hour segments?

6 MR. BARRETT: So because we are in a formal
7 hearing, and we do need to accept comments in the form
8 of feedback rather than questions, I would like to
9 recommend that we rephrase your comment to suggest that
10 the department could offer some clarity on that issue.

11 MS. O'CONNELL: Sure. I guess I need to rephrase.
12 I'm confused about the application of the minimum
13 increment once the eight consecutive hours has been
14 taken. And I'd like clarity on that eventually, and
15 that's my comment.

16 MR. BARRETT: Thank you, Abigail. We appreciate
17 that. The floor is open for any further comments.

18 MS. RUTLEDGE: Hi. This is Gina Rutledge again,
19 R-u-t-l-e-d-g-e. The regulations do allow employees to
20 file late. Is there going to be a time frame when
21 those, you know, late payments can be submitted? Like,
22 30 days or, you know, six months or something to that
23 effect would be nice. I mean, you've got the -- we
24 could file at least 30 days before, but what is the end
25 date for when someone could claim? Could it be last



1 year? Could it be, you know, within two years? We just
2 want to be sure.

3 MR. BARRETT: Great. Thank you, Gina. We'll take
4 the comment that clarity is needed on the time frame on
5 which a claim can be backdated.

6 MS. RUTLEDGE: And then with that, we want to know,
7 you know, for fraud on a voluntary plan and considering
8 on the voluntary plan's aspect, who would consider, you
9 know, the -- we would like a better definition of fraud,
10 put it that way, you know, something that is very clear
11 and cohesive as to this type of evidence for fraud.
12 Maybe, you know, who would define the fraud criteria?
13 Would it be the employer? Would it be you guys at the
14 state?

15 MR. BARRETT: Thank you again, Gina. We'll take
16 the comment that clear definitions of fraud as well as
17 clear and cohesive definitions as to the types of
18 evidence to demonstrate fraud are needed.

19 MS. RUTLEDGE: Great. Thank you.

20 MR. BARRETT: The floor is open for further
21 comment. We are now accepting comments by those joining
22 us in the room or by phone on Phase 4 of Paid Family and
23 Medical Leave rulemaking. If you have testimony to
24 offer on Phase 4 of Paid Family and Medical Leave
25 rulemaking, either here in the room or on the phone, you



1 may do so at this time.

2 We are now accepting comments from those joining us
3 here in the room or by phone of Phase 4 of Paid Family
4 and Medical Leave rulemaking.

5 Is there any further testimony concerning the
6 proposed ruling made either by phone or in person before
7 I conclude this hearing?

8 MS. RUTLEDGE: Hi. This is Gina Rutledge again.
9 If I may have one more question. When will an employer
10 know that their employee is receiving benefits? If
11 we're going to cough up, we would want to know how much
12 they are getting so that we don't overpay them.

13 MR. BARRETT: So, Gina, we'll take the comment that
14 employers would like information regarding the benefit
15 that the employee is receiving from the state once they
16 are on leave.

17 MS. RUTLEDGE: That would be great. Thank you so
18 much.

19 MR. BARRETT: Is there any further testimony
20 concerning the proposed rulemaking by either phone or in
21 person before I conclude this hearing?

22 In conclusion, this hearing was convened to
23 consider testimony on Phase 4 of the Paid Family and
24 Medical Leave rulemaking related to the continuation of
25 benefits, fraud and other topics related to establishing



1 a program. All oral testimony presented at this hearing
2 and written submissions will become part of the written
3 record. The deadline for submission of written comments
4 is today, May 29th, 2019, at 5:00 p.m. You can submit
5 written comments online by entering bit.ly/commentforum
6 into your Web browser. Comments must be received by
7 that deadline to be considered as part of this
8 rulemaking.

9 A final decision regarding adoption of this
10 proposed rulemaking will be made after all testimony and
11 written comments have been fully considered with a
12 target date of June 5th, 2019.

13 On behalf of Commissioner Suzi LeVine, I'd like to
14 thank you for participating in today's hearing. This
15 hearing is adjourned at 9:27 a.m. on May 29th, 2019.

16 (PROCEEDINGS CONCLUDED AT 9:27 A.M.)
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CERTIFICATE

[illegible]

I, RACHAEL L. HALL, do hereby certify that pursuant to the Rules of Civil Procedure, that I transcribed the oral proceedings in the foregoing matter, and that the foregoing transcript pages constitute a full, true and correct record of such oral proceedings and of the whole thereof.

Witness my hand this 4th day of June, 2019.

At Mall.

RACHAEL LOUISE HALL
CSR, CRR NO. 3265

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issue 10:18 issues 9:20 <hr/> <p style="text-align: center;">J</p> <hr/> January 5:8,11 Jason 3:20 5:6,16 joining 6:20 <hr/> <p style="text-align: center;">K</p> <hr/> kinds 8:22 <hr/> <p style="text-align: center;">L</p> <hr/> Law 3:4 leading 10:9 leave 3:13,21 4:1,5 5:2,7 6:5,22 8:2,11,12 legislature 5:8 level 5:18 Levine 3:23 Life 6:23 located 3:10 <hr/> <p style="text-align: center;">M</p> <hr/> made 9:8 make 7:25 8:4 9:21 makes 9:9 managed 4:18 manager 4:5 March 3:17 Marjorie 6:23,25 8:24 9:19 medical 3:13,21 4:1,5 5:2,7 6:5, 22 8:3 10:14,16,18 meet 8:10 Meetings 3:5 member 3:25 mentioned 5:16	met 8:9 microphone 6:15,18 mind 9:9 minimum 8:7,11,12 9:3 moments 5:16 morning 5:4 10:20 <hr/> <p style="text-align: center;">N</p> <hr/> nature 4:14 note 4:12 Notice 3:16 number 7:9 <hr/> <p style="text-align: center;">O</p> <hr/> officer 3:24 official 4:9 offline 9:20 ongoing 5:20 online 3:19 4:18,25 Open 3:5 <hr/> <p style="text-align: center;">P</p> <hr/> paid 3:13,21,25 4:5 5:2,7 6:5,21 8:9 10:17 part 4:9 10:6,7 participation 6:10 parties 3:19 5:1 passed 5:7 permanent 4:25 pertain 6:5 phase 3:13,14 6:21 7:12 phases 5:12 phone 6:15,17,21 7:7 plan 9:10,12 point 9:10,21 policy 3:20 4:1,4,18	portal 4:18 pose 4:16 position 7:23 possibly 9:1 posted 3:19 4:25 pregnancy 10:9,20,24 premium 6:3 premiums 5:9 presiding 3:24 problem 7:19 Procedures 3:6 program 3:16 5:15 6:12 proposal 5:5 proposed 4:13,24 provide 5:5 7:13 public 3:5,24 5:13 publication 4:24 publicly 9:23 Pursuant 3:3 <hr/> <p style="text-align: center;">Q</p> <hr/> qualify 10:17,21 question 4:16,17 questions 4:15,17 7:14,21 8:19, 20 10:6 <hr/> <p style="text-align: center;">R</p> <hr/> R-O-B-E-R-T-S-O-N 7:6 R-U-T-L-E-D-G-E 10:6 rambling 8:23 RCW 3:4,5 read 6:6 ready 6:19 reason 4:22 8:16 receive 5:2,20,22 received 4:23
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record 3:8 references 7:17 Register 3:17 regulation 8:13 regulations 7:8 relate 3:14 related 3:15 5:15 reopen 5:24 8:14 rephrase 4:16 reportable 6:2 reporter 4:8 7:2,5 represent 3:23 6:16 representative 6:17 require 9:12 required 9:24 10:15 requirement 7:24 response 4:23 Revised 6:9 Robertson 6:23 7:3,6,14 9:5 10:1 robust 6:7 room 6:21 rulemaking 3:14,24 4:9,25 5:12 6:11,22 rules 3:14 4:4,13,22,24 5:17 6:1, 4,5,6,7 7:12 Rutledge 10:5 <hr/> S <hr/> schedule 5:13 Security 3:22 sense 7:25 8:4 9:9 separate 10:15 series 7:21 set 8:18 sickness 10:20 signed 5:2	span 5:17 speak 6:14 9:22 spell 4:11 6:15 7:1,4 split 5:11 Spokane 3:1,10 staff 3:25 9:22 start 5:9 state 3:4,17,22 4:10 5:8 6:15,16 statement 4:21 statute 7:19,24 step 6:18 submit 8:2 submitted 8:20 successive 7:17 summary 4:22 Sun 6:23 Suzi 3:23 <hr/> T <hr/> talked 9:11 talks 8:13 team 4:1,18 terms 9:1 testify 6:14,18 testimony 3:12 4:11 6:13 text 6:6 thinking 9:15 time 7:13 Title 6:8 today 4:3 5:17 6:12 topics 3:15 5:15,18 transcribed 4:8 transcript 4:9 transcription 4:10 types 9:2,24 typically 8:1	typing 4:19 <hr/> U <hr/> understand 10:13 understanding 6:7 9:6 unmute 6:17 <hr/> V <hr/> view 9:10 voluntary 9:10,12 <hr/> W <hr/> wages 5:10 6:2 Washington 3:1,4,11,17,22 5:8 6:9 week 8:9 weekly 7:18,22 8:5 9:13 weeks 7:18 8:2 10:8,12,17,22 window 4:20 work 9:14,16 10:11 worked 8:8 works 8:3 9:3 written 8:19 WSR 3:18 <hr/> Y <hr/> year 8:15,17 10:11,19
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