

# **Memo**

**To:** All Construction Employers

**From:** JIB

**Date:** March 1, 2021

**Re:** Local Law 196

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The effective date for Local Law 196 and the requirement for workers to have a full SST card is today, Monday, March 1, 2021.

Starting today, Monday, March 1, 2021, the Employment Department will not refer anyone to work who does not have their full SST card. The member will be told that the Employment Department will call them back in two weeks. If at that time, the individual still has not received their full SST card, they will be marked as unavailable and their medical benefits will cease. A COBRA notice will be sent to them.

Employers who have employees that have not received their full SST card by March 1, 2021 can be subject to DOB fines. An employer can put those employees who do not have their full SST card on furlough for two weeks, if they are furlough eligible, to complete the course. If they are not furlough eligible, they can be put on temporary lay off for up to two weeks to complete the course. If they do not complete the course within the two weeks, they must be terminated and will not be eligible for medical benefits until they receive their full SST card and make themselves available for employment. The temporary lay off will not be available to complete the full SST card after March 31<sup>st</sup>.