



## **A Million Hours of “Temporary Work”:**

*How the U W Hospitals Mislabeled Hundreds of Employees to avoid providing Health Insurance*

Prepared by the Center for a Changing Workforce

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### Introduction to the Center for a Changing Workforce (CFCW)

The growth of contingent work is one of the largest challenges to decent living standards facing Americans today. Nearly one-third of US workers now work in what are labeled as “non-standard” jobs—temporary, part-time, contract work and similar categories. While “contingent work” is usually defined as “work that isn’t expected to last,” it is also used to describe all types of nonstandard work.

While some jobs are truly short-term or contingent, many workers are mislabeled or “misclassified” by their employers into “ineligible” contingent categories to avoid equal pay, benefits, and job security, sometimes with the help of temporary agencies. We use the word “**permatemp**” to describe these workers.

**Permatemp** – pûr’mə-těmp’ NOUN:  
A person who works on a long-term basis without being treated as a permanent employee...lacking the benefits of a permanent employee.

ETYMOLOGY: perma(nent)+temp.

*Source: Amer. Heritage Dictionary, 2000*

As the number of nonstandard workers grew dramatically in the 1990’s and into the new decade, new organizations have emerged to research, analyze and help workers respond to the changing workforce. The **Center for a Changing Workforce**, a nonprofit organization, was established in 1999 in Seattle to develop solutions for the problems caused by contingent work and misclassification of employees.

#### CFCW’s Mission

- To serve as a voice for misclassified workers.
- To analyze and expose improper and illegal employer practices.
- To counter employee misclassification with public policy, legal, and organizing strategies.

#### CFCW’s Accomplishments

- Publicizing the “permatemp” issue across the nation.
- Publishing the first independent national study of the \$30 billion employee leasing industry.
- Passing landmark legislation protecting permatemps in Washington State in 2002.

#### CFCW Services

- Providing advice and consultations for individuals and organizations on employment issues, litigation, and public policy.
- Analyzing policy proposals and legislation affecting contingent work and employer practices.
- Tracking litigation and organizing on employment classification practices through our website, [www.cfcw.org](http://www.cfcw.org).

## **PURPOSE**

The Center for a Changing Workforce (CFCW) responded to a request from AFSCME Council 28 to investigate the use of temporary workers at the UW Medical Center (UWMC) including Harborview Medical Center. Local leaders and staff believed that the UWMC, which also runs Harborview Medical Center, was using “temporary” (also known as “hourly”) employees to fill regular positions at the hospitals. CFCW has investigated other public employers, and determined that much of what is commonly considered “contracting out” is in fact illegal employee misclassification to prevent a large number of employees from receiving normal job benefits and protections, and to reduce FTE counts for budgeting and reporting purposes.

## **ANALYSIS**

CFCW began the investigation in November of 2001, by interviewing union staff and leaders, and hospital employees about employment practices at the two hospitals. Union leaders suspected that a large shift to the use of “temporary” employees had taken place from 1999 to 2001.

In January 2002, CFCW submitted extensive document requests under Washington’s Public Disclosure Act to the University of Washington. Some documents regarding benefit policies for temporary workers were made available within a month. CFCW received a copy of the “temporary” employee database from 1996 to January 2002 in electronic form in May 2002, and proceeded to analyze the data, focusing on employee longevity and practices in specific departments.

In May, CFCW also received 12 boxes of requisitions by UWMC for “temporary” staff paid by agencies. These requisitions authorized managers in various departments at the hospitals to spend money to bring in employees paid by staffing agencies. The size of the requisitions varied from \$100,000 to \$350,000. In some specialty areas such as nursing, where there is a personnel shortage, the extensive use of agency-paid staff is a common short-term stopgap solution to the larger problem of inadequate pay and working conditions for regular staff nurses. While the AFSCME bargaining unit in this case does not include nurses, it does include Certified Nursing Assistants (CNAs) as well as Surgical and other acute care technician positions, for which the UWMC was signing large contracts with staffing agencies.

With the help of staff from Council 28, we identified specific staffing agency invoices for CNA and Surgical Tech positions from the requisition forms. We received copies of these invoices in June and July, and CFCW created a database to try to measure overall use and specific employee tenure. We also requested requisitions from Harborview Medical Center for its use of staffing agencies. We were informed that Harborview Medical Center does not use requisitions, but we were provided with a printed database summary of Harborview’s use of contract staffing. From this database we identified clerical and other positions that were related to bargaining unit positions, and we were provided with invoices from a number of temp agency vendors, from 2000 to early 2002. We created several databases of these agency-paid employees to analyze

individual tenure and use by departments. At the request of the Council, we submitted a second PDA request for all documents related to a contract between UWMC and Service-master, Inc. to provide cleaning management and consulting at the hospital. We received those documents in July and provided them to the local for discussion in labor/management meetings.

While the PDA requests allowed us to look at thousands of documents, and gave us a reasonably complete database of “temporary” employees, there were major gaps in the staffing agency data that has been provided to CFCW under the PDA by the UWMC. Harborview could only provide temp agency invoices going back to late 1999. There were missing invoices for at least a year of agency billings to the UWMC. Thus, while determining the full extent of the problems is limited by the documents received to date, we can establish the findings below.

**GENERAL FINDINGS**

After reviewing both the employee and temp agency databases we created, we can make the following general conclusions. We found the initial suspicions of Council 28 staff and leaders to be accurate—there has been widespread misuse of hourly “temporary” employees at UWMC and Harborview Medical Center. In addition, we found evidence of misclassification of employees paid through staffing agencies—employees who worked for more than six months in the same position who should have been classified as UW/Harborview employees under the common law definition of employment, and been eligible for UW benefits. This misclassification was conducted through a practice known as “payrolling,” in which the real employer (UWMC) paid staffing agencies to “appear” to be the employer. An Accounts Payable analyst at UW told us that the reason this practice was used was to make the headcount of FTE employees seem lower than it really was.

**Misuse of “Temporary” Hourly Workers**

The UWMC (including Harborview) has violated the Washington Administrative Code (WAC 251.01.415) by employing 215 temporary employees over the “temporary” limit of 1050 hours

<b>Fig. 1 Number of “Temporary” Employees Working the Most Hours, 1995-2001</b>	
<b>Employees</b>	<b>Cumulative Hours</b>
1	7,071
22	> 5,000
63	> 4,000

during 12-month periods beginning with the employees’ anniversary date since 1996. The UWMC kept many employees in “temp” limbo after thousands of hours and many years of work. (See Figure 1.) Judy Tran, an employee in the “Temporary Staff Helper” classification, has worked **7,071** hours as a “temporary.” Twenty-two employees worked more than 5,000 hours, and 63 employees worked more than 4,000 hours. One “temp” worked 1991 hours in 12 months, more than full-time permanent employee hours.<sup>1</sup> Twenty-two employees worked

<sup>1</sup> While 2040 hours is theoretically considered to be year-round full-time employment, after deducting normal paid holiday, vacation and sick leave, actual full-time work on a job is about 1832 hours, or 916 for a half-time employee.

<b>Fig. 2 Number of “Temporary” Employees Who Worked More Than Five Years, 1995-2001</b>	
<b>No. of workers</b>	<b>Number of Years Worked</b>
217	More than 5 years
111	More than 6 years
42	More than 7 years

more than 1050 hours in multiple years, including two employees who worked more than 1050 hours for three years.

Measured by years, 42 “temporary” employees have worked more than 7 years, 111 employees have worked more than 6 years, and 217 employees have worked more than 5 years. (See Figure 2.)

Figure 3 shows the UWMC and Harborview job titles most likely to be filled with “temporary” workers in 2001. The biggest problem areas are Custodial,

Hospital and Nursing Assistants, Patient Service Representatives, and Food Service, with 21 job classifications exceeding 10,000 hours of “temporary” work in 2001. The complete list of hours and job titles is attached as Appendix 1.

<b>Fig. 3 UW Hourly “Temporary” Workers, Top 22 Job Titles by Hours Worked, 2001</b>			
<b>Title</b>	<b>Hours</b>	<b>Title</b>	<b>Hours</b>
Custodian	150830	Social Worker 1	16850
Hospital Assistant	72122	Pharmacy Asst 2	15849
Patient Service Rep.	62541	Stockroom Attend 1	15539
Food Service Worker	56861	Unit Service Coord.	14441
Office Assistant 2	54926	Stockroom Attend 2	14031
Nursing Tech	41420	Central Processing Tech 1	12977
Office Assistant 1	27482	Food Service Porter	12287
Phlebotomist	24959	Telephone Operator	12049
Office Assistant 3	24259	Physical Therapy 2	11617
Medical Assistant	23009	Pharmacy Assist 1	10871
Temp. Staff Help	17963	Hosp. Cent. Ser. Tech A	9592

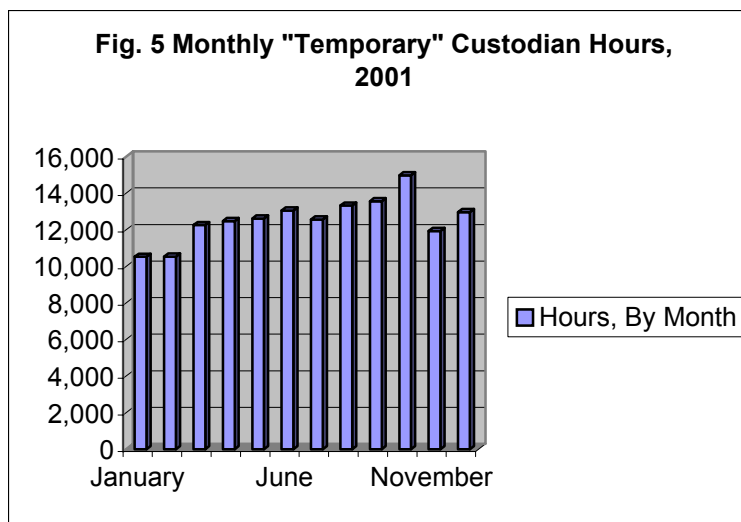
To give an example of how many workers were rotated through these positions, there were 252 “temporary” custodians during 2001, sharing the equivalent of 82 full-time positions.

The number of annual hours worked by “temporary” employees has increased since 1999, with over one million hours worked in 2001 (See Figure 4). The number of timesheets issued to “temporary” workers has increased in the past two years, from 29,705, to 30,018.

While some temporary employment is appropriate to manage changing workloads and cover for permanent staff vacations, our investigation has determined that UWMC has used “temporary” employees as an essential and growing part of the workforce assigned to regular, ongoing, year-round work.

Year	Number of “temporary” hours
1999	937,742
2000	972,432
2001	1,019,279

Figure 5 shows the actual number of “temporary” hours worked in the custodian position from 2001 UW payroll records. The average number of hours was 12,537 per month, and a minimum of 10,527 in January, and a maximum of 14,979 hours in October. This translates into a *minimum of 69 FTE positions per month, and an average of 82 FTE positions.*<sup>2</sup>



With approximately 240 classified FTE custodian positions at both hospitals, “temporary” employees without benefits are about one-third of the custodian workforce. **The UW has been using these positions to perform ongoing workflow, not temporary work.**

The UWMC has a long practice of filling permanent work positions with temporary workers by rotating part-time or part-year workers under a 1050-hour cap so as to avoid giving them permanent appointments and benefits. Our

analysis shows that in addition to the 215 workers that went over the 1050 hour cap, 780 people worked at least 916 hours in at least two years (916 hours is the actual number of hours worked by half-time workers after paid leave is subtracted for most public employers – See Footnote 1) but less than the UW’s 1050 hour standard. Thus, nearly 1,000 temporary workers were misclassified during the period in review.

In addition, it appears the UW has violated the Public Employment Retirement System statute by violating its duty to enroll many of these employees in ongoing positions into PERS. PERS rules, based on RCW 41.40.010(25), and published in the DRS Employer Handbook, state that eligibility in the retirement system is based on an analysis of whether the positions are eligible. An eligible position is defined as:

*“Any position which normally requires at least 5 months each year in which regular compensation is earned for at least 70 hours per month.”*

According to the Handbook, “normally” is defined as a position meeting the above standard in two or more years:

<sup>2</sup> Based on an FTE position with paid holiday, vacation and sick leave, leaving 1832 hours of work per year.

*“...the position requires 5 months of 70 hours or more during the first year and then 70 hours or more in at least one of the next two years.”*

While the UW labels “hourly” employees “ineligible” because they are “temporary,” we have found that in many positions, the use of “temporary” positions is a significant percentage of the ongoing regular workload, and thus many of these *positions* should be PERS-eligible from the first day of work. Setting aside the issue of whether the “positions” are eligible, we estimate that since 1995 over 500 individual temporary employees should have been eligible based on their hours of work, but were excluded.<sup>3</sup> It is likely that a full audit would determine that far more should have been considered eligible.

Many of these “temporary” employees, based on interviews with current workers, could have stayed at the UW long enough (5 years) for their retirement to vest, had the UW not misclassified these regular positions as “temporary” and limited the hours of most of the employees to less than 1050 per year. Even with the UW’s policy, there were 217 “temporary” employees who worked five years or more, and it is likely that a significant number of them worked enough hours to qualify for vesting.

**UWMC Misuse of Temporary Agency Employees**

In addition to “temporary” workers on its own payroll, the UWMC employs a significant number of health care workers through staffing agencies. Figure 6 shows the monthly average hours and FTE/half-time position equivalents for agency-paid Certified Nursing Assistants (CNAs) and Surgical Techs, two common job titles for employees paid by staffing agencies for year ending June 30, 2002. On an average monthly basis there were about 12 FTE positions, or about 24 part-time positions paid through agencies.

By using staffing agencies to payroll CNAs and Surgical/Instrument Techs who do ongoing work flow on a year-round basis, the UWMC has been misclassifying many of its common law employees as “temporary agency” workers.

**Fig. 6 Average Monthly Hours worked by Agency-paid Workers - July 2001-June 2002**

Position	Aver. Hours per month	FTE Equivalents
CNAs	958	6.25 FTEs 12.5 half-time pos.
Surgical Techs	869	5.7 FTEs 11.4 half-time pos.

Our partial analysis of UWMC staffing agency invoices from 1996 to 2002 found at least eleven employees who worked more than 1050 hours in one year periods dating from the anniversary of their employment, and five that were on pace to exceed temporary limits this year.

Agency billings for CNAs totaled \$489,319, for an average hourly cost to the UW of \$19.91 per hour. Billings for bargaining unit technician positions (including Anesthesia Techs, Surgical Techs, and Instrument Techs, Peri-op Center Core) totaled \$473,119 for October 2000- June 2002, with an average cost to the UW of \$30.18 per hour. These results are understated because invoices were missing for CNAs paid through agencies at UWMC in the following periods: a) August, 2000 – July, 2001; b) November 2001; c) February 2002-June 2002.

<sup>3</sup> Based on a sample of 5500 hourly employees who worked more than 350 hours in at least one calendar year.

In addition, records for bargaining unit Technician positions (including Anesthesia Techs, Surgical Techs, and Instrument Techs, Peri-op Center Core) were provided only from October of 2000 to June 2002, and appear to have gaps within this period. Including estimates for the missing data, total cost to the UW for agency CNA/Tech employees exceeded \$1 million.

**Harborview Misuse of Temporary Agency Employees**

In examining 2000-2002 staffing agency invoices from Harborview, we found evidence of misclassification by paying long-term employees through agencies. There were large sections of invoices missing from the materials provided in disclosure, limiting the research, but the results are clear. In reviewing Kelly Temporary Services invoices, most of which were within a one-year period, we identified four employees who worked in excess of 1050 hours, two of whom worked more than 1050 hours in two consecutive years, and five others who worked more than 916 hours per year. We found two employees paid through Manpower, Inc. who worked in excess of the 1050 hours. See Figure 7.

**Figure 7. Examples of Long-term Harborview Employees Paid Through Agencies 2000-2002**

<b>Name</b>	<b>Position</b>	<b>Dates of Employment</b>	<b>Total Hours</b>
Eugene Nardone	Secr.- Amb. Care/Pat. Finance	June 2000 – Oct. 2001	2503
Rosa Lopez	Secretary – Patient Care	June 2000 – June 2001	2093
Jean Rasmussen	Secretary – Env. Services	January 2001 – February 2002	1669
Christopher Bush	Receiving Clerk	May 2000 - April 2001	1750
Pamela Miller	Office Assistant/Buyer	May 2000 – January 2001	1340
Tina Pallis	Purchasing	May 2001 – January 2002	1340
Merrily Smith	Clerical – Interpretive Services	January 2001 – January 2002	1330

In the last example, the UWMC has worked a clerical employee, Merrily Smith, to near the 1050-hour temporary limit from January 2001 through mid-October, and then switched her to a similar job classification paid through Kelly for an additional 470 hours, from mid-October through mid-January, 2002. Since the Kelly invoices we received from Harborview were incomplete in 2002, it is quite possible she continued her work at Harborview well into this year. At a minimum this exceeds the annual limit by over 280 hours.

Because the payroll records we received for UWMC and Harborview direct hires were incomplete, and because the agency data were incomplete and also only dated back to 2000, it is likely additional workers are in this situation. We also limited the scope of our inquiry to UWMC/Harborview —it is likely some employees have worked directly for the UWMC up to their limit, and then continued to work for other UW departments either directly or through temp agencies.

An example of this is Victor Myers, who worked at the UW from October 1991 until March 2001. According to a May 2002 decision by the Washington Personnel Appeals Board, Mr. Myers worked as a “temporary” on the UW payroll, mostly in the Athletics Department, from October to April every year, and then was payrolled through a temp agency from May through September, at which point he returned to the UW payroll. While he only exceeded the 1050-hour cap on “temporary” employment on the UW payroll in one year, the decision of the board is noteworthy:

*“We are alarmed by the recurring pattern of Respondent’s (UW) employment practices that kept Appellant (Mr. Myers) working as a “temporary” custodian at the University for over ten years. Respondent intentionally manipulated Appellant’s hours of work between temporary and contract employment to avoid conferring him with the permanent status and benefits provided to classified state employees.”<sup>4</sup>*

In reviewing temp agency records submitted by Harborview Medical Center, there is a pattern of using temps to fill permanent positions in a number of departments. Development and Training, Environmental Services, Engineering, Interpretive Services, and Patient Care departments all used Kelly Services to pay workers for continuous periods from 11 to 16 months doing the same job. There were three workers payrolled by Kelly who worked at Harborview for 11 months or more.

The extensive use of temporary agencies by Harborview continues back at least through 1998; we estimate that Kelly and Accustaff billed Harborview over \$1.2 million for 1998-99.

As with the “hourly” workers, the UW’s use of agency-payrolled employees to perform ongoing workflow for extended periods of time violates the PERS statute providing eligibility for positions that normally require at least 5 months each year in which regular compensation is earned for at least 70 hours per month over a two-year period. In reviewing one year of Kelly invoices, we found ten employees who were DRS-eligible in at least one calendar year, and two who were eligible in two calendar years.<sup>5</sup>

The UW’s misuse of contingent workers also violates Chapter 155, passed by the Legislature this year. The “Public Employers—Unfair Practices Act,” Chapter 155, which CFCW played a leading role in developing, makes it an unfair practice for a public employer to “*misclassify any employee to avoid providing or continuing to provide employment-based benefits.*”

Until this year, the University of Washington was allowed to exempt employees labeled as “temporary” and working less than 1050 hours per year from state civil service laws and collective bargaining (WAC 251-04-035). Since the University of Washington has grossly abused this exemption by mislabeling hundreds of thousands of hours of regular, ongoing work each year as “temporary” work, the issue of reinstating this exemption needs to be closely examined.

#### **RECOMMENDATIONS:**

1. We recommend that the Washington Personnel Resources Board, in its consideration of changes in WAC 251-04-035, should address how the University of Washington has abused the exemption for “temporary” work by mislabeling employees doing ongoing work as “temporary” employees.
2. We recommend that the Department of Retirement Systems (DRS) should audit UWMC and Harborview by to investigate whether the UW has violated the PERS statutes by misclassifying regular employees doing ongoing workflow as “temporary” and limiting their hours, or paying workers through staffing agencies to avoid enrollment in PERS.
3. We recommend that the Chairs of the Labor or Government Affairs Committees in the Legislature hold hearings on the UW’s misuse of contingent workers.

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<sup>4</sup> Personnel Appeals Board, State of Washington, Case No. Rule-01-0038

<sup>5</sup> The Department of Retirement Systems applies the common law standards in determining who is an “employee” in an eligible position. RCW 41.40.010(22).

4. We recommend that the UW should be required to set up a “floater” pool of classified workers, rather than use “temporary” or agency-paid workers to handle routine fluctuations in workload in departments with a high usage of contingent workers.
5. We recommend a full investigation by appropriate state agencies of the use and abuse of misclassified temporary work to the rest of the UW campus, including both UW-payroll employees and temp agency-payrolled employees.

Appendix 1. List of Temporary Hourly Positions Exceeding 1000 Hours – 2001

Appendix 2. Key Departments at Harborview Using Kelly Services

Appendix 3. List of Long-term CNA and Surgical Tech Agency-paid Employees

<b>Appendix I.</b>			
<b>2001 UWMC/Harborview Temporary Hours - By Position</b>			
<b>Position</b>	<b>Hours</b>	<b>Position</b>	<b>Hours</b>
Custodian	150830	Painter	4090
Hosp Assistant	72122	Of Assist Lead	3592
Patient Service Rep.	62541	Traffic Guide	3457
Food Service Worker	56861	Camp Security Officer	3205
Office Assist 2	54926	Resp Care Asst	2879
Nursing Tech	41420	Elect Tech	2729
Office Assist	27482	Carpenter	2660
Phlebotomist	24959	Hospital CS Tech B	2640
Of Assist 3	24259	Lab Helper	2434
Med Assistant	23009	Adm. Asst	2427
Temp Staff Helper	17963	Therapist Recreat	2345
Social Worker 1	16850	Biomed Elec Tech 1	2300
Pharmacy Asst 2	15849	Occupational Therap 2	2210
Stockroom Attendant 1	15539	Med Transcript.	2201
Unit Service Cord*	14441	Tel Sys Tech	2125
Stockroom Attend 2	14031	Image Tech Trainee	2071
Cent Process Tech 1	12977	Mental Health Pract.	2023
Food Service Porter	12287	Security Guard	2023
Tel Operator	12049	ImageTech1	1992
Physical Therapist 2	11617	Diet Tech	1928
Pharmacy Asst 1	10871	Anesthesia Tech 2	1910
Hospital CS Tech A	9592	Mail Rater	1873
Snack Bar Lead	9565	Health care Spec Ld	1841
Pat Registration Rep.	9355	Purchasing Asst	1644
Cashier 1	9041	Physical Therapist 1	1503
Occupational Therapy	8825	Pat Care Coord	1502
Clinical Tech 1	8493	Comp Sup Anal	1425
Social Worker 2	8453	Audiologist	1383
Program Assist	7747	Fiscal Spec	1372
Mental Health Spec	7635	Gardener	1347
Retail Clerk	7506	H Info Anal2	1195
Health Info Analyst	7420	PhyTher3	1184
Health Care Spec	7187	Anes. Tech 1	1166
Resp Care Pract.	7174	Surg Tech	1152
Clinical Lab Tech	6690	Mach Mech	1110
Speech Path	6340	Lab Tech 1	1096
Prog Coord	5704	Vol Serv Coord	1081
Food Service Lead	5678	Data Entry Oper. 2	1054
Pharmacy 2	5501	ImageTech2	1016
Comp Tech	4960		
Cook	4744		
Driver	4306		

\* 2000 Data – 2001 Data Missing

<b>Appendix 2.</b>			
<b>Key Departments at Harborview Using Kelly Services*</b>			
<b>Department</b>	<b>Position</b>	<b>Dates of Temp Coverage</b>	<b>Months</b>
Rehab Medicine	Secretarial	6/26/00-4/8/01	8.5
Patient Care	Secretarial	6/5/00-7/8/01	13
Development & Train.	Secretarial	5/30/00 – 5/6/01	11
Mental Health	Secretarial	5/30/00-12/24/00	7
Managed Care	Secretarial	10/2/00 – 3/25/01	6
Interpretive Services	Reception	12/11/00 – 7/1/01	7.5
Interpretive Services	Secretarial	6/20/01 – 5/19/02	11
Health Coverage	Secretarial	5/30/00 – 11/5/00	5
Finance	Secretarial	12/4/00 – 6/3/02	7
Environmental Service	Secretarial	1/15/01 – 5/19/02	16
Engineering	Secretarial	6/5/00 – 10/7/01	16
EEG	Clerical	8/28/00-1/14/01	4.5
EEG	Secretarial	5/30/00-11/26/00	6
Ambulatory Care	Secretarial	1/01/01 – 6/17/01	6.5

\* Incomplete and Missing data – use is probably far greater.

<b>Appendix 3.</b>						
<b>Long-Term Agency-Paid Workers in CNA and Tech Positions at UWMC.</b>						
<b>Last Name</b>	<b>First Name</b>	<b>Job Title</b>	<b>Agency</b>	<b>Start Date</b>	<b>End Date</b>	<b>Hours</b>
Nazarina	A.	Instr. Tech.	HCN	12/3/01	12/14/01	1686
Nazarina	A.	Instr. Tech.	HCN	12/22/00	6/14/02	922.75
Chaney	Adriana	CNA	HRN	8/26/96	6/27/97	1273
Ludovissy	Marilyn	CNA	HRN	7/31/96	4/17/97	1270
Marks	Tina	CCST	SSI	3/21/01	3/22/02	1860
Marks	Tina	CCST	SSI	3/21/01	6/28/02	428.5
Miller	Sharon	Instr. Tech.	HCN	3/14/01	6/14/02	1404
Pilkington	Patricia	CNA	HRN	10/30/96	11/2/97	1603
Pilkington	Patricia	CNA	HRN	11/4/97	8/27/98	1455
Randall	Jeffrey M	CNA	HRN	7/21/99	7/23/00	1403
Turner	Larry	CNA	HRN	3/19/99	12/30/99	1423
Moore-Wilson	S.	Instr. Tech.	HCN	11/27/01	6/14/02	649

(Note – several will exceed 1050 hours this year if employment continues)