



# MEMO

March 24, 2022

**TO:** Pastors, Administrators, Finance & Operations Managers and Business Managers

**FROM:** Joe Crehan, Finance & Jim DiFrancesco, Human Resources

**RE:** Out of State Employment Law Compliance

Over the last two years, a number of locations have hired staff who work remotely (partially or fully remote) from locations outside of Massachusetts, and in some cases, outside the New England area.

As we noted in our April 2021 memo on this subject, each state has unique rules regarding the withholding of state employment taxes, unemployment insurance, and worker's compensation insurance.

To ensure that we are compliant in each state, we will need to contact the Finance & Operations Managers or Business Managers at the applicable locations to confirm that certain employees work remotely from out of state. For those working remotely, we'll also need the percentage of their time that is spent working remotely based on the average hours they work in total, per pay period.

We are writing to you now to be sure that you are informed of this initiative, and to give you an opportunity to contact us if you have any questions or concerns. We can be reached as follows:

- Joe Crehan, [jcrehan@rcab.org](mailto:jcrehan@rcab.org)
- Jim DiFrancesco, [jdifrancesco@rcab.org](mailto:jdifrancesco@rcab.org)

As a reminder, before hiring an individual that resides outside of Massachusetts, please contact Human Resources for guidance. Out-of-state arrangements may on rare occasions be feasible for certain positions, but they also bring a number of logistical, tax, employment law, and compliance issues, which can be complicated, time-consuming, and expensive to manage.

We appreciate your help on this issue.

Joe & Jim