

STATE COMPLIANCE · CHECKLIST COMPANION

Multi-State Roster Expansion

How to stay compliant when your workforce crosses into a new mandate jurisdiction, without running ten different programs. The reasoning behind each step on the one-page checklist.

STATE COMPLIANCE

TRAINING COMPLIANCE

MULTI-STATE

Why It Matters

A roster change is a compliance event

Harassment-training obligations are set almost entirely at the state and local level, so every time an employee starts work in a new jurisdiction, a new set of rules can attach.

You do not need a separate program for every state. You need one program built to the strictest common standard, deployed consistently, and documented everywhere. This checklist turns a roster change into a short compliance routine.

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States with a statewide training mandate: CA, NY, IL, CT, DE, ME, WA

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City and district mandates layered on top of state law: NYC, Chicago, D.C.

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Jurisdictions that set a specific duration in statute: CA, CT, Chicago

Map the obligation before the start date

Identify every state and city the new or relocating employees will actually work in, including local ordinances that add requirements on top of state law. For each, check the employer threshold, who must be trained, how often, any required duration, and the new-hire deadline. Flag the strict jurisdictions early: a program satisfying California, Connecticut, and Chicago will satisfy most others.

Localize content, not the whole program

Adopt interactive, role-specific training that meets the strictest applicable standard for everyone, then layer in the jurisdiction-specific pieces: bystander-intervention content, required in New York City, Chicago, Connecticut, and D.C., plus state complaint contacts and definitions. Then update the written policy, post the required notices, and distribute the policy for signed acknowledgment.

Document and re-verify

Track completion by employee, date, and content version, and retain records to the longest applicable period; Chicago's five years is the longest of the mandates and a safe default. Because these laws change frequently, set an annual date to re-verify thresholds, durations, and new jurisdictions.

ONE NUMBER TO REMEMBER

Only three jurisdictions set a specific training *duration* in statute: California, Connecticut, and Chicago. Everywhere else the law specifies *content*, not minutes, so ask any vendor quoting a required 'length' for the citation.

The Grid

What attaches, and when

The ten mandate jurisdictions, side by side, to answer step 2 of the checklist for each location on your roster.

Jurisdiction	Covered employer	Frequency	New-hire deadline
California	5 or more employees, incl. temporary and seasonal	Every 2 years	Within 6 months of hire or promotion
New York	All employers, any size	Annually	As soon as possible; guidance recommends 30 days
New York City	15 or more employees working in NYC	Annually	As soon as possible after hire
Illinois	All employers, any size; restaurants and bars add a supplemental module	Annually	Within the calendar year of hire
Chicago	1 or more employees inside city boundaries	Annually	Within the first calendar year, then annually
Connecticut	3 or more employees: all staff. Fewer than 3: supervisors	Once, with CHRO-recommended updates every 3 years	Within 6 months of hire or promotion
Delaware	50 or more employees in Delaware	Every 2 years	Within 1 year of start or promotion
Maine	15 or more employees in Maine	Once per new hire, plus an annual written notice to all	Within 1 year of start
Washington	Industry-specific: hospitality with 60 or more rooms, certain retail, security, property-service, licensed healthcare	Initial training on hire; refreshers required in some sub-industries	At time of hire for covered employees
Washington D.C.	Employers of tipped wage workers, mainly restaurants and bars	Every 2 years for owners, operators, managers, employees	Employees within 90 days of hire

What non-compliance costs

Most jurisdictions rely on the evidentiary damage in a harassment claim rather than a standalone fine. Four attach a number.

Jurisdiction	Retention	Penalty exposure
Connecticut	Completion and content records	Up to \$750 per violation under CGS §46a-97(c), administered by CHRO
Illinois	A record of training provided each year	\$500 for a first offense under 4 employees, up to \$5,000 per offense for repeat violations at larger employers (IHRA §8A-104(D))
Chicago	At least 5 years	\$500 to \$1,000 per violation, per day until corrected, plus posting fines
New York City	At least 3 years	No training-specific penalty. NYCHRL general structure: up to \$125,000, or \$250,000 for willful, wanton, or malicious violations (NYC Admin. Code §8-126)

Watch the non-mandate states too

Texas sets no training mandate, so it is absent from the grid above. SB 45 still reaches every employer with one or more employees, which makes training the practical defense there.

At a Glance

The checklist, step by step

The companion checkbox sheet walks through these 11 steps. Use the sheet in the moment; use this companion to understand the why behind each move.

MAP THE OBLIGATION

- ☐ **1 List every state and city the new or relocating employees will work in.**
Local ordinances (NYC, Chicago, D.C.) can add requirements beyond the state.
- ☐ **2 Check each jurisdiction's training mandate.**
Threshold, who must be trained, frequency, duration, and new-hire deadline.
- ☐ **3 Flag the strict jurisdictions.**
California, Connecticut, and Chicago set a duration; NYC, Chicago, Connecticut, and D.C. require bystander-intervention content.
- ☐ **4 Confirm the new-hire training deadline for each state.**
For example, California and Connecticut within 6 months, D.C. within 90 days, Illinois within the calendar year of hire.

LOCALIZE THE PROGRAM

- ☐ **5 Adopt training that meets the strictest applicable standard for everyone.**
Clearing the toughest rule clears nearly all the others.
- ☐ **6 Layer in jurisdiction-specific content.**
Bystander intervention, state complaint contacts, and state definitions.
- ☐ **7 Update the written policy with state-specific reporting and anti-retaliation language.**
- ☐ **8 Post required notices and distribute the policy for acknowledgment.**
Delaware and Maine both require a written notice or information sheet on top of training.

DOCUMENT & MAINTAIN

- ☐ **9 Track completion rosters by employee, date, and content version.**
- ☐ **10 Retain records to the longest applicable period.**
Chicago's five years is a safe default.
- ☐ **11 Set an annual re-verification date.**
These laws change often; re-check thresholds and new jurisdictions each year.

WHERE EMPATHIHR FITS

Clients receive a written compliance matrix maintained against their actual roster and locations, so a new hire in a new city is a routine update rather than a research project. **Schedule a compliance assessment · 866.240.6618 · empathihr.com**

Important

About this companion

Educational information, not legal advice. This companion is provided by empathiHR for general educational purposes. It is not legal advice and does not create an attorney–client or consultant–client relationship. Employment law changes frequently and varies by jurisdiction, industry, and the specific facts of each situation.

State and local training mandates change often, and several figures here are set by regulation or agency guidance rather than statute. Re–verify thresholds, durations, deadlines, and penalties against the primary source for each jurisdiction before relying on them. Before acting on anything in this companion, review your policies, programs, and specific circumstances with qualified employment counsel. empathiHR works alongside your legal counsel to build and maintain the operational program described here.

Statutes and figures were current as of the update date on the cover and should be re–verified against primary sources before you rely on them. Where the law is unsettled or a figure is not fixed by statute, this companion says so.



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