

What's coming in **October 2026** and what to do.

Your two-month notice for the coming laws. Contractor classification, NDA carve-outs, and cross-border wage hikes; all in one brief.

27

CHANGES TRACKED

4

WAGE INCREASES

12

JURISDICTIONS

3

LAW DEEP DIVES

JULY 9, 2026

POWERED BY EPHY · EPHY.IO

 THE PROBLEM

October is not a quiet compliance month. *It is a consequential one.*

Twenty-seven changes affect contractor classification, public-works timekeeping, employee meetings, privacy, payroll, workplace notices, youth hiring, and workplace safety across the U.S. and Canada.

This preview arrives 80 days early so employers can prioritize operational, system, and document changes before October 1.

 BY THE NUMBERS

October 2026 at *a glance.*



27

Changes taking effect in October 2026



4

Canadian provinces represented



3

Deep-dive briefs in this issue



CA\$17.95/hr

Ontario's new minimum wage (Oct 1)

THE DETAILS

The top three *most likely to bite* mid-sized employers.



#01

WORKFORCE PROTECTIONS

New Jersey; NJDOL

ABC test codified in final rules



#02

WAGES & COMPENSATION

Connecticut; PA 26-12

Daily attendance records on prevailing-wage jobs



#03

WORKFORCE PROTECTIONS

Maryland; SB 417 / HB 45

Captive-audience meetings banned



#01 · WORKFORCE PROTECTIONS

October 1, 2026 · New Jersey; Statewide

ABC test formalized: every contractor relationship needs a paper trail

New Jersey Department of Labor and Workforce Development

NJDOL's final rules (**N.J.A.C. 12:11**) formalize how the state applies the existing **ABC test** across six labor statutes. The employer still bears the burden of proving **all three prongs**; control, outside-usual-course, and independent trade.

Enforcement is expected to be **immediate on October 1**. Staffing-heavy sectors; construction, logistics, home services, IT consulting; face the greatest exposure.

Download the full brief for the six covered statutes, prong-by-prong evidence checklist, and the full penalty schedule.

KEY REQUIREMENTS & CHANGES

- **All three prongs required:** Failing any single prong (A control, B outside usual course, C independent trade) flips the worker to employee status.
- **Document the factual basis:** Contract language alone isn't enough; retain evidence of independence for every contractor engagement.
- **Reclassify before Oct 1:** Update payroll withholding, UI/TDI, sick leave accruals, and wage-and-hour treatment for anyone who fails the test.

Source: NJDOL · N.J.A.C. 12:11 (2026 Final Rules)

📄 DOWNLOAD BRIEF (PDF)

✓ YOUR ACTION

Audit every NJ contractor against all three prongs; document the basis and reclassify anyone who fails before October 1.

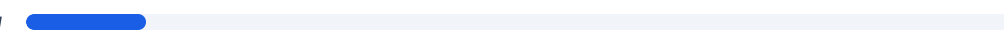
EFFORT
Medium

OWNER
HR + Legal

RISK
High

TIMELINE

Now



79 DAYS LEFT

October 1, 2026

Plenty of runway. Start planning this month.



#02 · WAGES & COMPENSATION

October 1, 2026 · Connecticut; Statewide (public works)

Prevailing-wage jobs get daily attendance records; and they're FOIA-public

Connecticut · Public Act No. 26-12 (Substitute HB 5003)

PA 26-12 requires contractors and subcontractors on covered public-works projects to keep **daily attendance records** for every worker on site and **submit them weekly** to the contracting agency. Records are **FOIA-public**.

The Act also directs the labor commissioner to use the **journeyman rate** when calculating the benefits portion of prevailing wages; payroll certifications need aligning at the same time.

Download the full brief for the required data fields, submission cadence, subcontractor flow-down language, and enforcement mechanics.

KEY REQUIREMENTS & CHANGES

- **Daily site-level tracking:** Name, trade license, arrival/departure, project name and location; every day, every covered site.
- **Weekly agency submission:** Roll up and file with the contracting agency each week. Assume the file is public.
- **Subcontractor flow-down:** Update subcontractor agreements to require the same records; GC exposure runs down the tier.

Source: CT Public Act 26-12 (Substitute HB 5003, 2026)

📄 DOWNLOAD BRIEF (PDF)

✓ YOUR ACTION

Stand up a daily attendance workflow, update subcontractor flow-down, and align payroll certs to the journeyman-rate methodology before October 1.

EFFORT

Medium

OWNER

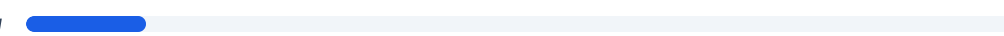
HR + Payroll +
Field Ops

RISK

High

TIMELINE

Now



79 DAYS LEFT

October 1, 2026

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#03 · WORKFORCE PROTECTIONS

October 1, 2026 · Maryland; Statewide

Mandatory 'captive audience' meetings are out; voluntary is the new default

Maryland · SB 417 / HB 45 · Commissioner of Labor and Industry

Maryland bans mandatory **captive-audience meetings**. Employers may not discipline or threaten employees for declining meetings about **religious, political, or union-organizing** matters. Legally required compliance trainings remain mandatory.

The **Commissioner has until November 1, 2026** to publish the model poster and notice; employers must post it and give it to every new hire. Expect NLRA-preemption and First Amendment litigation.

Download the full brief for the full penalty schedule, manager-training script, and litigation-readiness checklist.

KEY REQUIREMENTS & CHANGES

- **Meetings become voluntary:** Political, religious, or union-organizing meetings must be expressly optional; no consequences for declining.
- **Compliance trainings exempt:** Discrimination, harassment, and workplace-safety trainings required by law remain mandatory and lawful.
- **Retrain the manager bench:** Front-line managers are the enforcement risk; retrain on what they can (and can't) say about union activity.

Source: Maryland SB 417 / HB 45 (2026)

📄 DOWNLOAD BRIEF (PDF)

✓ YOUR ACTION

Reclassify affected meetings as voluntary, post the commissioner's notice, retrain managers, and update discipline SOPs before October 1.

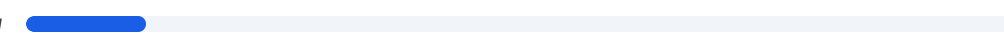
EFFORT
Medium

OWNER
**HR + Legal +
People Managers**

RISK
High

TIMELINE

Now



79 DAYS LEFT

October 1, 2026

Plenty of runway. Start planning this month.

\$ Four minimum-wage changes hit payroll on the same day

Three Canadian provinces and Connecticut's cannabis sector all adjust on October 1. Update payroll tables, posted wage notices, and any pay-equity comparators before the first pay period that crosses the date.

🇨🇦 Ontario
Employment Standards Act, 2000 · O. Reg. 285/01

NEW RATE · OCT 1, 2026
CA\$17.95/hr
~~CA\$17.20~~ +**CA\$0.75** (+4.4%)

FORMULA
Annual CPI-indexed adjustment (Ontario CPI).

COVERAGE
Most employees in Ontario; separate rates for students under 18, homeworkers, and hunting/fishing guides.

PENALTY
CA\$250–\$1,000 per individual violation; up to \$100,000 for repeat corporate offences.

🇨🇦 Manitoba
Employment Standards Code · MB Reg. 6/2007

NEW RATE · OCT 1, 2026
CA\$16.40/hr
~~CA\$15.80~~ +**CA\$0.60** (+3.8%)

FORMULA
CPI-indexed annual increase (Manitoba CPI, rounded to nearest 5¢).

COVERAGE
General minimum wage; applies to virtually all employees under the Code.

PENALTY
Back wages + Manitoba ESC administrative penalties for non-compliance.

🇨🇦 Nova Scotia
Labour Standards Code · Minimum Wage Order

NEW RATE · OCT 1, 2026
CA\$17.00/hr
~~CA\$16.50~~ +**CA\$0.50** (+3.0%)

FORMULA
National CPI + 1% adjustment formula, applied each October.

COVERAGE
Experienced and inexperienced rates aligned; single provincial minimum.

PENALTY
Back wages + Labour Standards fines; enforced by NS Labour Standards Division.

🇺🇸 Connecticut · Cannabis
Public Act No. 26-12 (HB 5003, signed 5/11/2026)

NEW RATE · OCT 1, 2026
\$16.94/hr
No tip credit (Full min wage)

FORMULA
Tracks CT standard minimum wage (\$16.94 as of 1/1/2026); ECI-adjusted each January 1.

COVERAGE
Cannabis establishment employees; dispensary facilities and producers. Tip credit eliminated 10/1/2026.

PENALTY
Double damages + attorney's fees under Conn. Gen. Stat. § 31-72; CT DOL wage enforcement.

#	DATE	JURISDICTION	WHAT THE LAW IS	PENALTY	OWNER	EFFORT	RISK
01	Sep 30	Florida	Florida minimum wage reaches \$15/hr; final scheduled step under Amendment 2.	MEDIUM \$1,000 per violation to the state; employee recovers unpaid wages + equal damages + attorney's fees; FL DEO enforcement.	Payroll, HR	LOW	MEDIUM
02	★ Oct 1	New Jersey	NJDOL final rules (N.J.A.C. 12:11) explain how NJ applies its existing ABC test across six labor statutes.	HIGH \$250/employee (1st) → \$1,000/employee (subsequent) + up to 5% of prior 12-mo gross earnings; stop-work orders.	HR, Legal	HIGH	HIGH
03	★ Oct 1	Connecticut	CT prevailing-wage projects require daily attendance records, submitted weekly (FOIA-public); PA 26-12.	HIGH Fines and/or imprisonment for missing records; enforced by CT DOL and contracting agencies.	HR, Managers	MEDIUM	HIGH
04	★ Oct 1	Maryland	MD bans mandatory 'captive audience' meetings on political, religious, or union matters (SB 417 / HB 45).	HIGH Up to \$10,000 (1st) / \$25,000 (subsequent) + cease-and-desist, reinstatement, back pay + attorney's fees.	HR, Managers	MEDIUM	HIGH
05	Oct 1	Ontario, Canada	Ontario minimum wage rises to CA\$17.95/hr (CPI-indexed under ESA, 2000).	MEDIUM CA\$250–\$1,000 per individual violation; up to \$100,000 for repeat corporate offences.	Payroll, HR	LOW	MEDIUM
06	Oct 1	Manitoba, Canada	Manitoba minimum wage rises to CA\$16.40/hr (CPI-indexed).	LOW Manitoba ESC administrative penalties up to CA\$5,000 per violation; back wages + interest.	Payroll, HR	LOW	MEDIUM

★ Highlighted items get a law deep dive in the next slides.

#	DATE	JURISDICTION	WHAT THE LAW IS	PENALTY	OWNER	EFFORT	RISK
07	Oct 1	Nova Scotia, Canada	Nova Scotia minimum wage rises to CA\$17.00/hr (CPI + 1% formula).	LOW NS Labour Standards Code fines up to CA\$500 per offence; back-wage orders + interest.	Payroll, HR	LOW	MEDIUM
08	Oct 1	Connecticut	CT cannabis establishments must pay full minimum wage; tip credit eliminated (PA 26-12).	HIGH Double damages + attorney's fees under Conn. Gen. Stat. § 31-72; CT DOL wage enforcement.	HR, Payroll	LOW	HIGH
09	Oct 1	Washington	WA Immigrant Worker Protection Act (HB 2105): notify workers of I-9 audits, outcomes, and deficiencies.	MEDIUM \$500/missed notice + statutory damages of 40× WA min wage per plaintiff; private right of action + attorney's fees.	HR, Legal	MEDIUM	MEDIUM
10	Oct 1	Michigan	Employers hiring minors must obtain work permits via the new centralized online system.	LOW Civil fines up to \$1,000 per violation; enforced by Michigan LEO.	HR	LOW	MEDIUM
11	Oct 1	Alabama	Trey's Law: NDA / settlement provisions barring disclosure of sexual abuse are void and unenforceable.	LOW No admin fines; provisions unenforceable; litigation & fee-shift exposure.	HR, Legal	LOW	LOW
12	Oct 1	Alabama	Alabama extends workplace smoking bans to vaping devices under the Clean Indoor Air Act.	LOW Administrative fines under Alabama's clean indoor air enforcement; AL Dept. of Public Health.	HR, Managers	LOW	LOW

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Every change taking effect in October 2026

#	DATE	JURISDICTION	WHAT THE LAW IS	PENALTY	OWNER	EFFORT	RISK
13	Oct 1	Maryland	MD hospitals must create nurse staffing committees and clinical staffing plans.	MEDIUM No per-violation fines; MD Dept. of Health oversight tied to hospital licensure conditions.	HR, Managers	HIGH	MEDIUM
14	Oct 1	Maryland	MD voids noncompetes for architects whose 30+ employee firms relocate out of state.	LOW No admin fines; provisions unenforceable in MD courts; enforcement attempts invite fee exposure.	HR, Legal	LOW	LOW
15	Oct 1	Maryland	MD lets workers satisfy county discrimination-claim prerequisites by filing with the MCCR.	MEDIUM No direct employer fines; expands exposure to civil actions under county laws (comp. damages + fees).	HR, Legal	LOW	MEDIUM
16	Oct 1	Connecticut	CT job postings must list wage ranges and benefits for all employers (PA 26-12).	MEDIUM Private right of action; compensatory damages + attorney's fees; CT DOL enforcement.	HR	MEDIUM	MEDIUM
17	Oct 1	Connecticut	CT bans employment promissory notes ('stay-or-pay') for all employers; small-employer exemption ends.	MEDIUM Notes are void; collection attempts expose employers to wage-statute enforcement by CT DOL.	HR	LOW	MEDIUM
18	Oct 1	Connecticut	CT employers with 100+ staff must publish a plain-language pay-code guide online.	LOW No fine schedule; CT DOL administrative enforcement; third-party payroll guides serve as safe harbor.	HR	MEDIUM	LOW

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Every change taking effect in October 2026

#	DATE	JURISDICTION	WHAT THE LAW IS	PENALTY	OWNER	EFFORT	RISK
19	Oct 1	Connecticut	CT employers must give written notice of ADA accommodation rights to all employees.	MEDIUM No fixed fines; bolsters CHRO and failure-to-accommodate claims (comp. damages + fees).	HR	MEDIUM	MEDIUM
20	Oct 1	Connecticut	CT lactation breaks expand beyond meal/rest periods to any reasonable break time.	MEDIUM CHRO complaints & civil actions; compensatory relief + attorney's fees; CT DOL enforcement.	HR, Managers	LOW	MEDIUM
21	Oct 1	Connecticut	CT grants 100% uncapped wage replacement to teachers and healthcare workers assaulted at work.	MEDIUM 100% uncapped AWW continuation + medical + court-appearance wages via CT WCC.	HR	MEDIUM	MEDIUM
22	Oct 1	Connecticut	CT employers must give written notice of electronic surveillance to employees.	MEDIUM Civil penalties under Conn. Gen. Stat. § 31-48d (\$500 → \$1,000 → \$3,000); CT Labor Commissioner.	HR	LOW	MEDIUM
23	Oct 1	Connecticut	CT data privacy law adds facial-recognition rules and ends employment-context exemptions.	HIGH AG enforcement under CTDPA; up to \$5,000 per willful violation + injunctive relief + restitution.	Legal, IT	HIGH	HIGH
24	Oct 1	Connecticut	CT WARN notices must disclose whether layoffs stem from AI adoption.	MEDIUM Standard WARN-style back pay and benefits for the notice period; CT DOL enforcement.	HR, Legal	LOW	MEDIUM

★ Highlighted items get a law deep dive in the next slides.

#	DATE	JURISDICTION	WHAT THE LAW IS	PENALTY	OWNER	EFFORT	RISK
25	Oct 1	Manitoba, Canada	Manitoba limits employer sick-note demands and requires reimbursing employees for note costs.	LOW Reimbursement claims + Manitoba ESC administrative penalties.	HR, Managers	LOW	LOW
26	Oct 1	Quebec, Canada	Quebec Law 27: prevention programs / action plans on psychosocial risks due for most employers.	HIGH CNESST fines up to CA\$70,866 per offence; doubled for repeats; criminal liability for willful harm.	HR, Safety	HIGH	HIGH
27	Oct 1	Los Angeles County, CA	LA County hotels must provide 6-hour certified housekeeping training to covered staff.	MEDIUM LA County ordinance enforcement; civil penalties + private right of action for covered workers.	HR, Managers	MEDIUM	MEDIUM

★ Highlighted items get a law deep dive in the next slides.

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