

# Lauren Swanson Reviews Notable Eleventh Circuit Ruling Clarifying the Limits of Compensable Work Time

*Law360* “Expert Analysis” Article

In The News | 1 min read

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Hinshaw attorney Lauren Swanson recently authored a *Law360* “Expert Analysis” article examining the Eleventh Circuit’s decision in *Villarino v. Pacesetter Personnel Service, Inc.*, which clarified the limits of compensable work time under the Fair Labor Standards Act (FLSA) and Florida law.

[Drawing inspiration from a prior \*Employment Law Observer\* blog post](#), Lauren analyzes how the court affirmed summary judgment in favor of a staffing agency, rejecting claims that deducted transportation costs and unpaid time spent traveling to worksites, collecting tools, or waiting at a labor hall violated federal or state wage laws. The decision offers practical guidance for employers in Alabama, Florida, and Georgia navigating non-traditional work arrangements.

Lauren also reviews the court’s application of the Portal-to-Portal Act framework to claims involving travel time, tool collection, and waiting time at the labor hall, noting that these activities were preliminary rather than integral and indispensable to employees’ principal job duties.

Lastly, her article offers takeaways and compliance considerations for employers, emphasizing the importance of structuring transportation programs as optional conveniences, maintaining clear written agreements, and regularly auditing pre- and post-shift practices to minimize wage-and-hour risk.

[Read the full article \(PDF\)](#)

- *Law360*: “[11th Circ. Ruling Offers Guidance On Compensable Work Time](#)” (February 23, 2026)

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