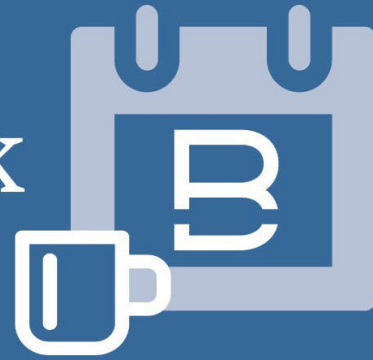


# The Work Week

Bassford Remele Employment Practice Group



April 27, 2026

Welcome to another edition of *The Work Week with Bassford Remele*. Each Monday, we will publish and send a new article to your inbox to hopefully assist you in jumpstarting your work week.

[Bassford Remele Labor & Employment Practice Group](#)

---

## **When a Commute Becomes a Covered Errand: Minnesota Supreme Court Addresses Workers' Compensation in the Hybrid Work Era**

[Nicolas L. Hanson](#)

On April 22, 2026, the Minnesota Supreme Court issued an important decision clarifying when a worker injured during a return-to-office commute may be entitled to workers' compensation benefits. In *Ludwig v. Dakota County*, A24-1989, 2026 WL 1084501 (Minn. Apr. 22, 2026), the Supreme Court unanimously affirmed that Cindy Ludwig, a county clerical employee, was entitled to compensation for a back injury she sustained while loading employer-owned equipment into her vehicle on the morning she was required to return to in-person work following an extended remote work period during the COVID-19 pandemic.

### **Case Background and Court Holding**

Ludwig had worked for Dakota County since 2002 out of its Hastings office. When the pandemic began in March 2020, the County directed her to work from home and she took all of her County-owned office equipment with her, including her laptop, monitors, docking station, keyboard, headset, and office chair. In 2021, her managers notified her that she was required to return to the office on September 8, 2021, to begin a new hybrid schedule. On that morning, Ludwig left fifteen minutes earlier than usual to allow time to set up her workstation before her shift began at 8:00 a.m. While loading a bin of equipment into her van, she fell and injured her back.

Under the Minnesota Workers' Compensation Act, injuries that occur while an employee is commuting to or from work are generally not compensable. There is, however, a well-established exception known as the "special-errand exception," which provides that an employee who is injured while performing a special task or errand at the employer's direction is considered to be

within the scope of employment from the moment she leaves her home until she returns. Ludwig argued her injury fell within this exception; the County argued it did not.

The Minnesota Supreme Court held in favor of Ludwig. In its opinion, the Court held that Ludwig's situation satisfied the circumstances in which the special-errand exception has traditionally been applied: the service was performed outside of normal working hours at the employer's implied request; the equipment transport was an integral part of the service Ludwig was to perform; and the task was non-recurring and not part of her normal workday duties.

### **Implications for Minnesota Workers and Key Takeaways**

This decision carries meaningful implications for Minnesota's growing hybrid workforce. The Court was careful to note that its ruling does not render every hybrid worker's equipment-related commute compensable. Rather, the key distinguishing facts here were that Ludwig was returning to the office for the very first time following a prolonged, employer-directed period of remote work, and that no backup equipment was available at the office. The Court expressly declined to expand the special-errand exception to routine hybrid commutes where an employee regularly transports equipment back and forth as a matter of course. Much of the Court's analysis hinged on the fact that the County's return-to-office mandate (and in addition, return of office equipment) was an integral part of Ludwig's job, but that the incident which occurred was "not one which was regular and recurring during the normal hours of employment."

For Minnesota employers and employees alike, *Ludwig* confirms that a one-time, employer-directed return to the office following a remote-work period, particularly where the employee must transport essential equipment and no on-site alternatives exist, can give rise to compensable workers' compensation claim for injuries sustained during that commute. Employers managing hybrid transitions should take note of this decision and consider whether their return-to-office directives carry implied obligations that could affect their workers' compensation exposure.

The Bassford Remele Employment Group closely monitors caselaw and statutory developments to help advise employers of changes to state and federal employment laws. Please reach out if you need any assistance.

---

---

**LEARN MORE ABOUT OUR EMPLOYMENT PRACTICE » »**

---

---