

3202

**Kathy Cooper**

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**From:** Paul Jaspers <pauljaspers@lcbcchurch.com>  
**Sent:** Wednesday, November 13, 2019 4:00 PM  
**To:** IRRC  
**Subject:** Comments on IRRC Regulation 3202 - Proposed Overtime Regulations

**CAUTION: \*\*EXTERNAL SENDER\*\*** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Public Comment 3202 Review Commission,

I appreciate the opportunity to comment on the final proposed regulations submitted by the Pennsylvania Department of Labor and Industry. As a nonprofit organization these proposed regulations will create a significant negative impact on our organization and the very employees it is intended to help. This will cause the need to convert a number of our employees to an hourly status which will not only reduce the flexibility they enjoy in working in the ebb and flow of ministry work by requiring them to "punch a clock", but may reduce their compensation when they work less than 40 hours per week. Further, training and development opportunities may need to be limited for these employees. The new federal regulations going into effect January 2020 are a reasonable adjustment and one that we as an organization can support, and without significant impact to our organization. When you look at the cost of living with Pennsylvania you find we are at the average for the nation, so taking that, you would assume we would be the perfect example for the new federal regulations. However, these proposed changes would increase the state to a salary threshold exceeding the federal numbers by more the 25% after 3 years! Also, rather than aligning the state regulations with the federal these proposed changes do just the opposite by creating more complexity. As a nonprofit making a difference in 14 communities and growing in Pennsylvania, this will have an impact on our ability to serve. As a not for profit organization in Pennsylvania and serving Pennsylvanian we cannot just increase our prices or move to a different state to conduct business, this is where we serve. Wages and benefits are our number one and two costs so this will impact how we use the generosity of the gifts given by our congregations. Please reconsider this proposal, and make the decision to use the more reasoned proposal being enacted by the federal government and increase alignment between PA and federal regulations. Thank you for the opportunity to respond.

Paul Jaspers  
Team Resourcing Director  
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Sincerely,

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