

July 24, 2018

Department of Labor and Industry
State of Pennsylvania (VIA Facsimile and Mail)

Pennsylvania Independent Regulatory Review Commission (VIA Email)

SUBJECT: Proposed Overtime Rules for Pennsylvania

I am submitting my comments to the proposed overtime Rules for the State of Pennsylvania. The Pennsylvania Department of Labor & Industry (L&I) will publish in the June 23 *Pennsylvania Bulletin* new regulations intended to increase the salaries of Executive, Administrative, and Professional salaried workers who are exempt from receiving minimum wage and overtime pay. This proposed regulation will actually increase these salaries slightly more (\$47,892) than the proposal that was issued by the Obama Administration in 2016 (\$47,456), stayed by a federal judge, and later rescinded by the Trump Administration.

I disagree with the L&I's assessment for the potential increase of the salaries proposed by L&I. The impact to our organization specifically would be over \$200,000 annually. This is a significant impact for us, negatively affecting service to our students, and our competitiveness in the market. With limited revenue sources beyond tuition, the additional cost will necessarily result in tuition increases – directly in opposition to current USciences initiatives meant to limit student indebtedness. This regulation impacts us directly in comparison to universities in other states (our direct competitors) that will not have to live by these same rules. Essentially this increase makes Pennsylvania schools less competitive in the higher education market.

This also will create unnecessary challenges for those positions that are impacted by this proposed rule. We currently have very dedicated staff working with our students, often on difficult issues. Those staff would now potentially be limited at the time they can work with students due to budget constraints. Imagine having to ask a student having difficulty to go home and return the next day due to budget issues.

This proposed increase will also negatively affect staff training, travel and professional development and our organization will almost certainly need to re-evaluate the hiring of many of these positions.

Therefore, USciences requests that L&I reconsider the proposed overtime rules. If you have any questions, please contact me directly at m.janes@usciences.edu or 215-596-8697.

Respectfully,

Michael G Janes
Director of Human Resources

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