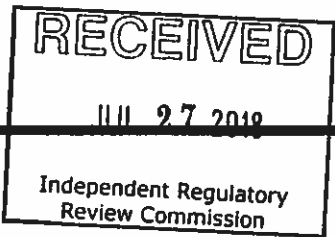


3202



Kathy Cooper

From: Carolyn Rheam <Carolyn@hartmangroup1.com>
Sent: Friday, July 27, 2018 2:16 PM
To: IRRC
Subject: IRRC Number 3202, Amendments to 34Pa. Code, Chapter 2231, regarding Overtime Pay
Attachments: Hartman reply to PA DLI Proposal 2018.docx

Importance: High

Hello,
Please accept the attached letter from Michael P. Gaetano, President of The Hartman Agency regarding
IRRC Number 3202, Amendments to 34Pa.Code, Chapter 231, regarding Overtime Pay

We strongly recommend that this NOT be implemented.

Thank you for your assistance in this matter.
Kindest Regards,

Carolyn R. Rheam, PHR, SHRM-CP I HR Specialist and Project Coordinator
The Hartman Agency | **A Hartman Group Company**
420 William Street | Williamsport, PA 17701
T: (570) 326-7241 | F: (570) 322-0916
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July 27, 2018

PA Department of Labor & Industry
Bureau of Labor Law Compliance
Attn: Bryan Smolock
1301 Labor & Industry Building
651 Boas Street
Harrisburg PA 17121

RE: Proposed Rulemaking
Title 334 Labor and Industry
Regulations for Minimum Wage
34 Pa. Code, Part XII, Chapter 231

Dear Mr. Smolock,

While we can appreciate the PA Dept. of Labor & Industry's effort to increase the white collar salary exemption threshold it is entirely too ambitious and punitive for the average business man.

A business owner should not be forced to choose between wages and health care benefits for their employee. Despite the proposed increase being smaller than the original FLSA regulations proposed in 2016 , they are still a devastating blow to the business owner. It is near impossible to expect that an employer could implement a 25% salary increase for two consecutive years. The national average for salary increases has been about 3 % for the past five years. We would strongly advocate that a more gradual stepped increase be implemented.

Unfortunately this is a classic example of a good idea gone to the extreme end of the continuum. This proposal needs much further discussion and clarification to align with current FLSA duties test. We hope that a reasonable increase can be implemented that will bolster our workforce while not closing businesses

Sincerely,

Michael P. Gaetano
President