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Kathy Cooper

From: Smolock, Bryan <bsmolock@pa.gov>
Sent: Wednesday, August 08, 2018 3:30 PM
To: Kathy Cooper; IRRC; Haffner, Garrett; Rapach, Jennifer Buchanan; Schramm, Robert (LI-OCC)
Subject: Fwd: Impact to Local Organizations of Proposed Changes to PA Overtime Regulation

From: Tina Goodrich <tgoodrich@horizonfcu.org>
Sent: Wednesday, August 8, 2018 7:56 AM
To: Smolock, Bryan
Subject: Impact to Local Organizations of Proposed Changes to PA Overtime Regulation



Tina Goodrich
2849 Reach Road
Williamsport, PA 17701

August 7, 2018

Dear Bryan Smolock,

I am a local human resource professional and am concerned about the impact that changes to the overtime regulations will have on my organization and our employees. Adopting regulations for Pennsylvania that dramatically increase the salary threshold and set it at the 30th percentile of weekly earnings of full-time salaried workers in the Northeast, in addition to updating the salary threshold every three years, will have a significant negative impact on the labor costs for my organization.

This proposal will also have a negative impact on employees as we adjust our workplace rules in order to control our overtime costs. This may include limiting the ability to work overtime and reducing workplace flexibility.

Basing the increases on a national level is grossly unfair for those regions of the country who do not have the wages that support these increases. Our Credit Union is small, under 50 employees. The proposed increases will have a major impact on the overtime that would be permitted, which in turn has a domino effect and would drastically affect our ability to service our members to the best of our ability. We are requesting that the Labor Department defer its rulemaking until the federal DOL publishes its new rule and align the Pennsylvania regulation to accord with the new federal rule. In the alternative, we request the Department modify its proposed rule to provide that white-collar exemptions under federal and Pennsylvania law are the same in all respects.

Please take my concerns into consideration as you evaluate these rules.

Sincerely,
Tina Goodrich