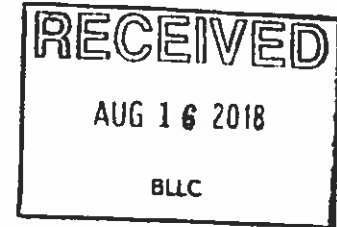
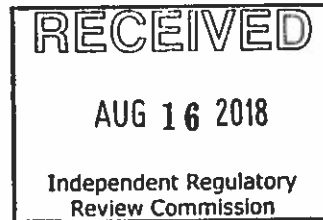


#3202

ROSEMONT
COLLEGE
the POWER of small

August 9, 2018

Mr. Bryan Smolock
Director, Bureau of Labor Law Compliance
Pennsylvania Department of Labor & Industry
651 Boas Street
Harrisburg, PA 17121



Re: PA Department of Labor & Industry Regulation #12-106, Amendments to 34 PA Code Chapter 231
with Respect to Overtime Pay

Dear Mr. Smolock,

I am writing to express my opposition to the Pennsylvania Department of Labor and Industry's proposal to change the salary threshold for exempt employees in Pennsylvania. An increase in the threshold to \$921 per week will have a detrimental impact on Rosemont College and the students we serve.

Rosemont College is a small liberal arts institution located in Montgomery County. 98% of the students in the Undergraduate College receive some form of financial aid and 32% are the first in their families to attend college. In response to the national trend of skyrocketing tuition prices, the College took the bold step of reducing its tuition by 43% in 2015. As a College community, we work diligently to keep our expenses low while providing our students a quality education. At present, over 50% of the College's annual operating budget is spent on personnel costs, including salaries and benefits. If this proposal becomes law, the College will either need to increase affected employee salaries at an approximate cost of nearly \$400,000, or reclassify 34 employees from salaried to hourly.

Neither option is beneficial to the students we serve, and, in fact, will likely cause them significant harm.

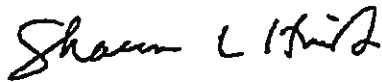
The increase in affected employee salaries could result in our needing to increase tuition or reduce or eliminate expenditures that directly impact the quality of the educational experience.

The reclassification of employees from salaried to hourly will negatively impact how those employees view their roles, and how they interact with our students. Many of the roles that these employees hold are in student services, athletics, and similar areas that have a direct impact on student well-being. As such, their work schedules vary greatly and include travel with students and other duties that cannot conform to shift work or a standard "9 to 5" 8-hour work day. The proposed overtime rule would severely impact their ability to carry out their responsibilities to mentor and assist our students, and ultimately hurt our students.

In addition, the US Department of Labor has indicated that it may propose a new national salary threshold for exempt employees in 2109. It would be in the best interest of all Pennsylvanians for the PA Department of Labor & Industry to delay any action until the US Department releases its proposal, so that a more comprehensive analysis of the impact of federal requirements on all Pennsylvania employers, but particularly colleges and universities can be conducted.

I appreciate the opportunity to share my concerns, and I hope that my rationale will help to illustrate why this proposed legislation will have a detrimental impact on Rosemont College and the students we proudly serve.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Sharon L. Hirsh". The signature is written in a cursive, flowing style.

Sharon L. Hirsh, PhD '70
President