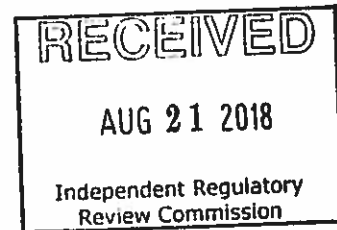




960A Harvest Drive, Suite 100
Blue Bell, PA 19422
610-825-9360 fax 610-825-2414

3202

August 20, 2018



Mr. Bryan Smolock
Director, Bureau of Labor Law Compliance
Pennsylvania Department of Labor & Industry
651 Boas Street, Room 1700
Harrisburg, PA 17121

Re: PA Department of Labor's Proposed Regulatory Amendments to 34 Pa. Code Chapter 231 regarding Overtime Pay, IRRC #3202

Dear Director Smolock,

KenCrest is a faith based human services organization that provides services to 12,000 people with Intellectual Developmental Disabilities and employs 2,000 staff in over 400 locations in Pennsylvania, Delaware, and Connecticut. As the President and CEO of KenCrest, I am writing to writing to thank you for the opportunity to comment on the proposed Pennsylvania Department of Labor's (L&I) regulatory amendments to regarding Overtime Pay, IRRC #3202.

KenCrest supports an increase to staff wages as it creates economic growth, increases staff retention, and promotes high staff morale. Recently, our agency has taken steps to create a career ladder and improve staff pay. KenCrest is supportive of raising the base pay for Pennsylvania's workers; however, we ask that L&I work closely with the appropriate agencies and the Pennsylvania General Assembly to ensure that necessary additional Medicaid funding is met so that the proposed rule can be implemented properly.

Nonprofit service providers are publicly funded and therefore cannot increase operating or service costs without additional funding from the General Assembly. If the proposed amendment was enacted without adequate funding from the state legislature, human service organizations would not be able to continue providing high quality of life services to the disability community. To avoid the disruption of these services, KenCrest respectfully requests that L&I, the appropriate agencies, and the General Assembly work together to meet an increased need for Medicaid funding for reimbursement rates. KenCrest is confident that the proposed rule will result in the necessary state funding to implement an increased executive, administrative, and professional or "EAP" salary threshold.

Thank you for the opportunity to comment on the proposed amendments. If you have any questions, please contact Maureen Quinn, Government Relations Strategist, by phone at 610-825-9360 ext. 1020 or by email at Maureen.Quinn@KenCrest.org.

Sincerely,

A handwritten signature in black ink that reads "Marian Baldini". The signature is written in a cursive style with a large, prominent initial "M".

Marian Baldini
President and CEO
KenCrest