



BUCKS COUNTY  
**WOMEN'S**  
ADVOCACY COALITION

**PARTNER ORGANIZATIONS**

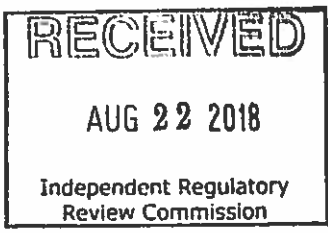
- A Woman's Place
- AAUW Doylestown Branch
- AAUW Levittown-Lower Bucks Branch
- Big Brothers Big Sisters of Bucks County
- Breastfeeding Resource Center
- Bucks County Area Agency on Aging
- Bucks County Commissioners' Advisory Council for Women
- Bucks County Drug and Alcohol Commission Inc.
- Bucks County Housing Group
- Bucks County Intermediate Unit #22
- Bucks County Opportunity Council
- Bucks County Workforce Development Board, Inc
- Bucks-Mont Collaborative
- BuxMont Unitarian Universalist Peace and Justice Committee
- Child Home & Community
- Delaware Valley Association for the Education of Young Children
- Family Service Association of Bucks County
- Housing Alliance of Pennsylvania
- Interfaith Community of Lower Bucks
- Jane Barr Horstman & Associates
- Keystone Progress
- LaVO Design
- League of Women Voters of Bucks County
- Libertae
- Makefield Area Action Fund of AAUW
- Maternity Care Coalition
- NAACP, Bucks County Branch
- National Alliance on Mental Illness- Bucks County Chapter
- National Council of Jewish Women - PA
- Network of Victim Assistance
- PathWays PA
- Planned Parenthood Keystone
- Public Citizens for Children and Youth
- Quality Child Care Coalition of Bucks County
- Rolling Harvest Food Rescue
- Sincerely Marketing & Design
- Socrates Developers, LLC
- Soroptimist International of Bucks County
- The Council of Southeast Pennsylvania
- The Peace Center
- Women's Center of Montgomery County
- Woods Services
- YWCA Bucks County

**PARTNER INDIVIDUALS**

Hundreds of Individual Partners and Growing

August 21, 2018

**Bryan M. Smolock, Director**  
**Bureau of Labor Law Compliance**  
**PA Department of Labor and Industry**  
**651 Boas St., Room 1301**  
**Harrisburg, PA 17121**



Dear Mr. Smolock,

I am writing on behalf of the nonpartisan Bucks County Women's Advocacy Coalition, its 250+ individual and 43 organizational partners, to express our support for the proposed changes to the PA Minimum Wage Act of 1968 to update the definition of EAP exempt salaried workers.

The BCWAC advocates on behalf of women to promote systemic change to achieve economic security for all. The current determining wage of \$23,660 is far below the poverty level for even one adult and one child in Bucks County. Assigning someone a title of "executive" while they earn pay only at a poverty level rate is inappropriate.

Further, the overtime rules were originally established to ensure that no one but higher-level workers with control over their own time and tasks could work beyond forty hours without receiving overtime compensation. Changes to the "duties test" made in 2004 allowed employers to misclassify as exempt thousands of workers who do not have direct control over their hours and tasks. This amounts to wage theft and is an obstacle to women and families achieving economic security.

Over 50% of Pennsylvania workers presently defined by the 2004 EAP definition as exempt are women, many of whom are the primary income earners in their households and comprise a major proportion of workers in service areas, health care, hospitality, retail, and administrative assistance. These workers are systemically underpaid through unfair classification.

The suggestion that this increase is "too much too soon" seems callous when the proposed change is incremental over four years and many of the misclassified workers have been underpaid for decades. How long should people be expected to wait to be paid a fair wage for time worked?

The proposed changes will have additional benefits as well, giving the 460,000 estimated people impacted increased purchasing power that will enhance economic growth in PA and decreasing the need for public assistance programs by lifting these full-time workers out of poverty.

Sincerely,

**Kathleen Welsh Beveridge**  
**President**