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Kathy Cooper

From: Smolock, Bryan <bsmolock@pa.gov>
Sent: Wednesday, August 22, 2018 5:49 PM
To: Kathy Cooper; IRRC
Cc: Rapach, Jennifer Buchanan; Schramm, Robert (LI-OCC); Lengel, Michelle
Subject: Fwd: Comments from Nonprofit Organizations on Pennsylvania's Proposed Overtime Eligibility Rule



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From: Stephen Herzenberg <herzenberg@keystoneresearch.org>
Sent: Wednesday, August 22, 2018 5:02 PM
To: Smolock, Bryan
Subject: Comments from Nonprofit Organizations on Pennsylvania's Proposed Overtime Eligibility Rule

To: Independent Regulatory Review Commission Members
c/o: Bryan Smolock
Re: Pennsylvania's Proposed Overtime Eligibility Rule

We, the undersigned nonprofit organizations that operate and/or do work in Pennsylvania, write in support of the Pennsylvania Department of Labor and Industry's new overtime regulations. The updated overtime rule is a great victory for working people in Pennsylvania.

In its recently announced notice of proposed rulemaking, the Pennsylvania Department of Labor and Industry proposed to phase in an increase in the salary threshold below which most workers are eligible for overtime pay to \$47,892. This change will create thousands of jobs, extend overtime protections to nearly half a million Pennsylvania workers, reduce excessive hours of unpaid work by underpaid employees, and increase salaries for employees earning near the new threshold. In particular, this rule represents an important step toward fairer pay for women and people of color, who are overrepresented in lower-paying jobs and are often required to work additional hours without compensation.

We recognize that many nonprofit organizations will have to think through and solve interesting problems and will face challenges as we make the changes needed to comply with the new regulations. These important changes will not necessarily be easy. Nonetheless, we embrace this opportunity to restore the 40-hour week and the overtime pay to which lower-paid workers toiling more than 40 hours a week are entitled.

For many nonprofits, including those of us that provide human services or advocate for workers' rights, poverty reduction, or economic and social justice, this is a critical opportunity to improve the working conditions and the economic lives of the people we serve. At the same time, our own workers and the families they support also deserve fair compensation and greater economic security.

As nonprofit organizations more broadly, we are dedicated to improving the public good. It is time to revisit the idea that working for the public good should somehow mean requiring the lowest-paid among us to support these efforts by working long hours, many of which are unpaid.

All of the undersigned nonprofit organizations are committed to complying with the new overtime regulations. We commend the Department of Labor and Industry for this significant reform, which will create better jobs and working conditions for hundreds of thousands of working people throughout our state. We support this historic social justice reform.

Signed,

Restaurant Opportunities Center of Pennsylvania
PathWays PA
Rebuilding Together Philadelphia
Philadelphia Unemployment Project
Unitarian Universalist Pennsylvania Legislative Advocacy Network (UUPLAN)
Pittsburgh United
Pennsylvania Budget and Policy Center
Keystone Research Center
Raise the Wage PAI
Pennsylvania Immigration and Citizenship Coalition
Pennsylvania Council of Churches
National Employment Law Project
One Pennsylvania
Women's Law Project
Keystone Progress
Philly Neighborhood Networks
Make The Road PA
Pennsylvania Together
Community Legal Services of Philadelphia