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Kathy Cooper

From: David Huang <DHuang@clsphila.org>
Sent: Friday, March 18, 2022 1:20 PM
To: IRRC
Subject: CLS Comment to Regulation #12-114: Minimum Wage

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The Workers' Rights and Advocacy Project at Community Legal Services (CLS) strongly support the proposed PA minimum wage regulations to be considered by the IRRC. The regulations further the objectives of the Pennsylvania Minimum Wage Act and better protect the rights of Pennsylvania workers. Specifically, the proposed regulations will clarify the calculation for overtime wages for eligible employees, standardize the definition of "tipped employees" to prevent abuse of the "tip credit" under PA law, and tighten the rules on tip pooling practices and credit card and service tips so that tipped employees get the full benefits of the tips that they deserve. For a more detailed summary of our position on the regulations, please see this comment submitted in response to the Notice of Proposed Rulemaking: http://www.irc.state.pa.us/docs/3322/COMMENTS_PUBLIC/3322%2012-21-21%20Community%20Legal%20Services.pdf.

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Review Commission**