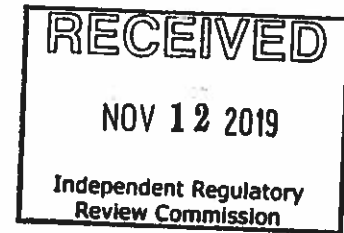


3202

Kathy Cooper

From: Irrchelp
Sent: Tuesday, November 12, 2019 7:42 AM
To: IRRC
Subject: FW: Overtime Rule Expansion



-----Original Message-----

From: Tim Flood [mailto:tim.flood@aleragroup.com]
Sent: Monday, November 11, 2019 6:58 PM
To: Irrchelp <irrchelp@irrc.state.pa.us>
Subject: Overtime Rule Expansion

CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Chairman Bedwick,

My firm works with 100s of small business owners in central PA handling their business insurance and healthcare insurance. This rule would not just impact their botto line due to the increase in wages but also increase their workers comp premium substantially with no more revenue coming in the door! The proposed rate is simply too high and outdated policy!

Thank you for the opportunity to comment on proposed regulations submitted by the Pennsylvania Department of Labor and Industry (L&I). These regulations are intended to update the rules that determine if an employee is required to be paid overtime.

Though this proposed regulation may be well-intended I am concerned with the negative impacts on employers and many of the very employees whom the proposal is supposed to help. L&I proposes to increase the salary threshold by over 92 percent and require regular increases.

This dramatic increase will force many employers to convert salaried employees to hourly status, which usually entails a far more rigid work schedule with less flexibility, burdensome record-keeping, fewer training opportunities and benefits. Hourly workers required to clock in and clock also risk less take-home pay if hours worked in a week dip below 40.

The proposed regulation, if enacted, would impose a significant burden on Pennsylvania employers and employees with additional costs to closely monitor employees' time and update their human resource systems. The regulations would also provide fewer opportunities for flexibility in the workplace, a potential for employers to cut hours and burdensome record keeping.

As a Commonwealth, both salaried workers and businesses need workplace flexibility and opportunity that reflects the creative workplace of the 21st Century inspires creativity and supports a pro-growth business agenda that enhances Pennsylvania's competitiveness.

We urge the Independent Regulatory Review Commission to disapprove of this regulation and take into consideration the negative implications on the business community.

Thank you for the opportunity to provide comment and feedback on the Final Form Regulation submitted by the Pennsylvania Department of Labor and Industry (L&I).

Sincerely,

Tim Flood
4550 Lena Dr
Mechanicsburg, PA 17055
tim.flood@aleragroup.com