

September 1, 2015

US Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

To Whom It May Concern:

The Greater Springfield Chamber of Commerce, which consists of over 1,500 partner businesses and organizations, believes the Department of Labor's proposed overtime rules changes regarding exempt status for white collar workers would negatively impact the business community and their employees. We believe employees and employers alike are best served by a system that promotes flexibility in schedules, provides clarity for employers when classifying employees, and career advancement opportunities for workers.

The Department's proposed increase of the salary levels required for the white collar exemptions, from \$23,660 per year to \$50,440 per year, is excessive, damaging, and would have negative impacts for employees, employers and the economy. While we recognize the need to adjust the salary basis level may exist, an increase of 118%, is neither logical nor practical. An increase of 118% is far from representative of the rate of inflation or salary increases since 2004.

The proposed changes will actually have a significant negative impact on employers and workers. Some employees will have to be reclassified (to being non-exempt), however, the vagueness of the "duties test" presents a potential burden and liability for employers. At the same time, studies have demonstrated that while a few workers will experience pay raises, millions will either see their hours reduced, or will see their base salary reduced in anticipation of potential over-time, both of which hinder employees' opportunity for career advancement.

The proposed changes will also reduce a business' ability to offer a flexible work schedule that is adaptable to the needs of employees, as employers will be forced to closely monitor and detail work hours to avoid lawsuits. Not only does this add to administrative costs, leaving less revenue to invest in business growth and employee wages, it takes away employees ability to work from home or remotely, as it can be difficult for employers to track employees' hours in those situations.

We encourage the Department of Labor to consider two things: First, extend the comment period for 60 days, to November 3, 2015, in order to hear from a greater number of the affected parties; second, if the minimum salary threshold is to be amended, use a more reasonable formula or methodology to increase the threshold in a way that it is consistent with the rate of inflation and or average salary increases since the last increase in 2004.

Thank you for your consideration.

Sincerely,

Chris Hembrough
President & CEO