



**BOARD OF COUNTY COMMISSIONERS
WARREN COUNTY, OHIO**

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August 13, 2015

**TOM GROSSMANN
PAT ARNOLD SOUTH
DAVID G. YOUNG**

Dear: Department of Labor, Wage and Hour Division

Comments Regarding: RIN 1235-AA11-Proposed Changes to FLSA Salary Threshold

Warren County understands this proposed rule, as currently written, would increase the standard salary level required to qualify for exemptions from overtime pay by increasing the threshold from the current \$455 per week (\$23,660 for a full-year worker) to \$970 per week (\$50,440 for a full-year worker) effective in 2016.

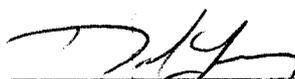
Our Board of Commissioners, respectfully submit that an increase of over 100% creates an economic hardship for this and other similar counties and small businesses. The salary structure of smaller government entities includes numerous positions that would be adversely affected by such a drastic change. A mandate of this size removes the ability of smaller government to analyze the local job market and make related salary decisions relative to their leadership positions. Warren County prides itself on providing employees with an excellent salary and benefits package.

In Warren County's organization, there are several leadership positions that meet one of the exemptions but would not meet the proposed salary test. Just under the Board of Commissioners jurisdiction, we have estimated that if this rule becomes effective in 2016, the cost to this county would be an estimated \$89,000. As mentioned, this does not take into account any employees that fall under the other Warren County Elected Officials or Agencies or a twenty-seventh pay period, which will occur in 2016. While the current threshold of \$455 per week may be low and some increase is reasonable, the proposed increase is simply too much for small governments to absorb at one time.

Additionally, Warren County is opposed to the proposal of an automatic increase in the threshold salary level. An automatic increase would not take into account an economy such as the country has experienced these past few years. Such a hardship would adversely affect the ability of small governments such as Warren County to provide necessary services to its citizens.

Respectfully,

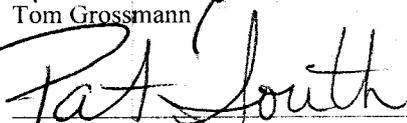
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David G. Young, President



Tom Grossmann



Pat Arnold South