



RE-1 VALLEY SCHOOL DISTRICT

Logan County, Colorado
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September 1, 2015

Ms. Mary Ziegler, Director
Division of Regulations, Legislation and Interpretation
Wage and Hour Division
U.S. Department of Labor
Room S-3502
200 Constitution Avenue, N.W.
Washington, DC 20210

Dear Ms. Ziegler:

In the K-12 Public Education realm, we do not have the luxury of creating more or newer “widgets” or increasing our prices in order to increase profits. We are at the mercy of state and federal funding and, as you must be aware, there is hardly enough monies available to fund the mandated requirements under which we currently must operate.

While we’re immensely grateful an exception is provided for teachers (and it appears the exemption will continue), there remain a number of staff for whom these rules will apply. The impact on a school district’s budget will be hard hitting. For the past several years, our staff and Board of Education have worked very hard to attempt to stay within a budget that allows us to provide an education to the youth in our community. Recently, we have had to go into reserves for operating expenses; this is not good business but unavoidable. It is very unlikely the community will support going into reserves to increase the salaries that will be impacted by the new minimum standard salary level.

Our non-teaching staff are dedicated to our role in supporting students; that very often means we’re working long hours. There just are not many options for school districts to be compliant with the proposed rules. You might think, as one of the staff who would be affected by the new minimum salary standard, that I would welcome the possibility of an increase, but I’m more concerned that a requirement such as this will force layoffs or lower hourly salaries if forced to move staff to non-exempt status.

Please consider how this will affect public education (and other non-profit service organizations) before finalizing the new rules. Perhaps a tiered or categorized approach based on the number of employees or non-profit vs. for-profit might be considered. As the proposed changes stand, without increasing funding for public education, the domino effect of this can only ultimately be detrimental to students.

Sincerely,

A handwritten signature in cursive script that reads 'Kim Krier'.

Kim Krier
Human Resources Director