



**College and University Professional
Association for Human Resources**

July 14, 2016

The Honorable Kurt Schrader
U.S. House of Representatives
2431 Rayburn House Office Building
Washington, DC 20515

Dear Congressman Schrader:

On behalf of the College and University Professional Association for Human Resources (CUPA-HR) and our more than 19,000 human resources professionals and other campus leaders at over 1,900 colleges and universities across the country, I am writing in strong support of the *Overtime Reform and Enhancement Act* and to thank you for your leadership on an issue of critical importance to the higher education community.

On May 18, 2016, the Department of Labor's final overtime rule increased the overtime threshold from \$23,660 to \$47,476 per year, a 100% increase that will occur all at once on December 1, 2016, and in all areas of the country regardless of significant regional economic differences. The Department will also automatically increase the minimum salary threshold every three years. This will be difficult for colleges and universities to absorb. In addition, automatically updating the threshold without regard to the economic circumstances facing the country is unwise.

While we agree that an increase to the minimum salary threshold is due and that DOL must update the salary levels and regulations from time to time to ensure the exemptions are not abused, DOL's final salary threshold is simply too high and ignores the widespread concerns of colleges and universities across the country that submitted comments and economic analysis, wrote letters to Congress, and met with Administration officials to advocate for positive changes that would lessen the negative impact of the many unintended consequences associated with the proposed rule.

The *Overtime and Enhancement Act* would mitigate many of these unintended consequences by providing more time for employers to come into compliance by phasing-in the DOL's new salary threshold over three years, starting with a 50% increase on December 1, 2016. Importantly, this legislation would also eliminate the automatic three-year increase to the salary threshold and support future increases through proper notice and comment rulemaking.

CUPA-HR strongly supports this legislation and other legislative efforts by congressional leaders to address the overtime rule. Thank you again for your support and leadership on this important issue.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Joshua A. Ulman", is written over a light blue horizontal line.

Joshua A. Ulman
Chief Government Relations Officer
College and University Professional Association for Human Resources