

September 3, 2015

SUBMITTED TO ELECTRONIC DOCKET

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

Via: <http://www.regulations.gov>

**Re: Comments on Docket No. RIN 1235-AA11
Defining and Delimiting the Exemptions for Executive, Administrative, Professional,
Outside Sales, and Computer Employees**

Dear Ms. Ziegler:

The undersigned Latino-led, Latino-serving nonprofit community organizations from across the country write in support of the proposed rule to expand overtime pay protections. Our organizations form the Affiliate Network of the National Council of La Raza (NCLR), the largest national Hispanic civil rights and advocacy organization in the United States. As employers in the nonprofit sector with a shared mission of improving opportunities for Hispanic Americans, we urge you to act swiftly to update the overtime salary threshold to ensure workers' paychecks keep up with their productivity.

Latinos, who have the highest labor force participation rate but earn some of the lowest wages, stand to benefit disproportionately from this regulatory change. The Economic Policy Institute estimates that Latinos represent 15.5% of workers who will directly benefit from raising the overtime salary level to \$50,440 per year, yet they represent only 11.6% of the salaried workforce. In total, 2.1 million Latino workers, or 34.4% of all Latino salaried workers, would benefit. The rule would also automatically update the salary threshold over time to keep current with wage growth and inflation, which is important to sustaining working families' incomes in the long run.

The nature of our work as nonprofits raises unique challenges that we ask the Department of Labor to address in the final regulation. These challenges include irregular business hours and executives paid below the salary threshold. We look forward to a rigorous employer outreach campaign from the Department to ensure that we can properly comply with this new rule and contribute to its success in improving economic security for Latinos.

Thank you again for the opportunity to comment on this proposed rule. Should you have any questions regarding these comments, please contact Stephanie Román at sroman@nclr.org or (202) 776-1791.

Sincerely,

American Latino Center for Research, Education & Justice (ALCREJ)

Camino Nuevo Charter Academy

Center for Latino Progress (formerly Connecticut Puerto Rican Forum, Inc.)

Colorado Latino Leadership, Advocacy & Research Organization (CLLARO)

Comunidades Unidas

Conexión Américas

East Boston Ecumenical Community Council (EBECC)

East Harlem Council for Community Improvement (EHCCI)

El Centro Hispano, Inc.

El Paso Community Action Program, Project BRAVO, Inc.

Encuentro

Familias en Acción

Guadalupe Centers, Inc.

Hispanic Unity of Florida, Inc.

Houston Gateway Academy, Inc.

Hyde Square Task Force

Latino Network

Mexican American Unity Council, Inc. (MAUC)

Neighborhood Partnership Housing Services, Inc.

Southwest Key Programs, Inc.

Spanish Speaking Citizens' Foundation

Tejano Center for Community Concerns

Vera Court Neighborhood Center, Inc.

Watts/Century Latino Organization