

Instead, we propose the following:

1. The state should implement its new salary threshold at \$47,476 (the 2016 proposed federal salary threshold.)
2. We further propose that this level be pro-rated for part-time exempt employees.
3. We also urge a phase-in of implementation of the recommended \$47,476 threshold over a 3 year period to enable our organizations to accommodate the additional expenses. The consequences of a sudden significant increase in the salary threshold would be challenging for the non-profit organizations signing this letter.
4. Finally, it is burdensome to have a salary threshold grow each year and we recommend a rate that could be in place for three to five years before again increasing.

We agree with the language proposed by the state to better align the States' duties tests in as many ways as possible with the Federal duties test. The proliferation of tests and criteria by multiple regulatory agencies and court holdings have created huge administrative and risk burdens for employers.

While we support Washington State's effort to review and update exempt-level salaries, it is critical for our organizations that the salary threshold increase to a more reasonable level, and you should reject the rapid escalation as proposed, to prevent harm to non-profit arts and culture organizations. Indeed, when the FLSA was adopted in the 1930's, it was hailed as one of the New Deal's most important labor reforms and a way to promote employment and protect workers from the dangers of unregulated commerce. In this context, we urge the State to avoid the dangers of the flip side – i.e., over-regulation and establishing mandates that are unnecessary, impractical, and harmful to the arts and culture non-profit sector.

Signed, members of the *Arts & Culture Human Resources Roundtable*

- Ben Leifer, Human Resources Manager, The 5th Avenue Theatre
- Bill French, Director of Human Resources, The Museum of Flight
- Darryl Roberts, Human Resources Manager, Village Theatre
- Elizabeth Detels, Director of Human Resources, Seattle Art Museum
- Ethelyn Abellanosa, Sr. Manager, Human Resources & Operations, Museum of History & Industry
- Kat Bosold, Human Resources Manager, Children's Museum of Tacoma
- Kathryn Osburn, Human Resources Manager, Seattle Symphony
- Lanie Bolieu, Controller, Frye Art Museum
- Mark Davidson, Vice President, Human Resources / Talent, Pacific Science Center
- Nancy Del Villar Vivé, Director of Human Resources, Seattle Opera
- Nate Dwyer, Director of Human Resources, Seattle Theatre Group
- Serae Kim, Vice President, People & Culture, Woodland Park Zoo
- Stuart Jennings, Interim Director of Human Resources, Seattle Rep
- Terrie Flaming, Director of Human Resources, Pacific Northwest Ballet
- Tia Winch, Assistant Deputy Director, Imagine Children's Museum