



Via Email

September 21, 2018

The Honorable Dr. Charles Dawson, Jr.
Chair, Audit & Finance Committee
Albany County Legislature
112 State Street
Albany, New York 12207

RE: Local Law "C" for 2018 – The Albany County Paid Sick Leave Act

Dear Chair Dawson,

The Capital Region Chamber, representing more than 2,400 area businesses and organizations that employ more than 150,000 area residents, has reviewed the latest available version of the above referenced proposed local law. Please be advised that even in its amended form the Chamber and our members, both for-profits and non-profits, remain strongly opposed to this proposal.

The Chamber has communicated its position on this proposal to the Legislature on several occasions and I have provided the Law Committee with our concerns regarding specific sections of the proposal for their consideration.

I take this opportunity to communicate our concerns as they relate to the Audit and Finance Committee's jurisdiction. The Chamber is greatly concerned that this proposal would create a separate bureaucratic layer within Albany County which would require additional human and financial resources. If this bill were enacted, it would result in new administrative, investigative, audit, mediation and administrative adjudication functions within Albany County. Each would require new staffing and the associated financing. It is the Chamber's position that Albany County's budget does not and cannot support these new functions without additional revenue. Consequently, taxpayers and employers within Albany County would be required to pay for this new layer of county government via increased taxes and/or fees. I am attaching a list of the Chamber's specific concerns for the committee's review.

Thank you in advance for your consideration of the Chamber's perspective on this proposal.

Sincerely,

Thomas J. O'Connor
Vice President, Government Relations

Attachment
cc: Members of the Audit & Finance Committee

At the Center of New York's Tech Valley
capitalregionchamber.com



Concerns Re: Proposed Local Law "C" for 2018 – The Albany County Paid Sick Leave Act

Section 1. Legislative Intent

The Chamber takes issue with the claim that this mandate will be implemented in a manner that is feasible for employers. The Chamber believes that this proposal cannot be implemented in a manner that will be both practical and without tremendous cost to employers and Albany County taxpayers.

The Chamber believes that the County must provide the public with the fiscal impact of implementing this proposal.

Section 7. Employer Records

The Chamber believes that this section will require new audit staff capable of reviewing time and attendance records as they relate to Local Law "C" for 2018.

Section 9. Regulations

The Chamber believes this section will require new administrative and enforcement staff knowledgeable of employer requirements under Local Law "C" for 2018.

Section 10. Enforcement

The Chamber believes this section will require new investigative staff knowledgeable of employer requirements under Local Law "C" for 2018 and mediation staff knowledgeable of administrative law. Since this section provides an appeals process, an administrative law judge(s) may be required. In addition, staff capable of preparing administrative decisions required by Local Law "C" for 2018 will be required.

The Chamber believes that new administrative support staff will be required in order to: create and disseminate all required Agency notices; assist in the preparation of the required annual report; and assist in the maintenance of the Agency's website content as it relates to the provisions of Local Law "C" for 2018.

The Chamber believes that the penalties for violating the provisions of this proposal are excessive.

Section 17. Public Education and Outreach

The Chamber believes this section will require new staff skilled in public education and public engagement with expert knowledge of all aspects of Local Law "C" for 2018.

Conclusion: The Chamber is greatly concerned that this proposal would create a separate bureaucratic layer within Albany County which would require additional human and financial resources. Albany County's budget does not and cannot support these new functions without additional revenue. Consequently, taxpayers and employers within Albany County would be required to pay for this new layer of county government via increased taxes and/or fees.

Note: This is not an all-inclusive list of the Chamber's concerns. It is provided to highlight some of our specific concerns. The Chamber is strongly opposed to this proposed mandate.