

MEASURE: HB 3390  
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## Standard Insurance Company Request for Amendment of HB 3390

This statement is submitted on behalf of Standard Insurance Company, Oregon's largest domestic insurer and financial services company, and an employer of 2000 Oregonians. The Standard has been headquartered in Oregon for 106 years, and we pride ourselves on being an involved part of this community.

HB 3390 is a controversial bill, and we do not offer comment on the pros and cons of a statewide paid sick leave mandate. Rather, should this Committee decide to support adoption, we request a few common sense changes to the legislation to reduce the burden on employers who, like The Standard, provide leave benefits that meet or exceed those contemplated by HB 3390.

**Section 2(3)(b)** exempts from Section 1 employers who offer "a sick leave policy that in effect provides eligible employees with paid sick leave benefits that equal or exceed the paid sick leave required by this section."

We request clarification here that a Paid Time Off (PTO) bank system, which is commonly used today by larger employers for all leave and vacation events, satisfies the requirements of Section 1. Section 2(3)(b) above could simply state "a sick leave or paid time off policy that in effect provides..."

**Section 7(5)** requires that "A covered employer shall post a summary of the provisions of sections 1 to 9 of this 2013 Act in a conspicuous and accessible place in or about the premises where employees are employed."

We request that employers who already offer PTO or sick leave benefits that meet or exceed the bill's requirements be exempted from new posting requirements, as doing so will create confusion amongst employees who will incorrectly infer that their existing benefits are changing. This may be accomplished by simply adding to Section 2(3)(b) a statement that Section 7(5) also does not apply to those employers.

Absent an exemption from the physical posting rules, we request clarification in Section 7(5) that employers who utilize annual electronic enrollment and posting of benefit summaries be allowed to use that same "posting" method and frequency. Again, any out of cycle benefit notices at an employer who already provides these benefits will only serve as a source of confusion for employees.

Thank you for your consideration of these edits to HB 3390 to reduce the impact on Oregon employers already providing sick leave or paid-time off benefits.

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