

Hello - my name is Tom Engel and I am the owner and Principal Consultant of Vantage Point Business Solutions - an HR Consulting firm in Beaverton.

I am writing to express my strong concerns and misgivings about HB 3031 in its current form.

The smaller Oregon employers that I work with (2 to 50 employees) are still wrestling with even the basics of administration of new laws that are coming into force right now and those that are on the books for a few years - such as the Equal Pay Act, Oregon Saves, and even Oregon Sick Leave. These are employers and owners that are answering the phones, working with customers, turning wrenches and otherwise trying to run their business.

It has been my experience that even the most successful small business is generally not aware of the nuances of employment laws and HR practices that you and I take for granted. For myself, I have over 15 years of direct experience in the field an advanced training and an MBA. The Legislature, has the advantage of staff, an HR office and an infrastructure of support to help them understand and navigate employment issues.

Most smaller Oregon businesses and non-profits are focused on the job at hand, and manage people issues based on instinct, judgment calls, scarce resources and good intentions. They don't have HR systems in place, don't have the slightest idea of how to manage overlapping leave and absence requirements (e.g. Oregon Sick, OFLA, and potentially HB 3031) - and certainly can't afford to have someone out for 32 weeks, pay for that absence, and potentially pay for someone else to cover that absence.

Even if there was a fund to cover part of the costs, the administration alone could cripple a small business that lacks the framework to manage it with confidence.

As a Democrat and small business owner myself - I agree on the surface with this and many other proposals currently in the pipeline for consideration this Legislative term. I don't wish to come across as "the sky is falling" - but this bill will severely hamper smaller organizations with employees.

At the very least, if we're going to go down this path - let's align the policy proposals with frameworks that other Oregon laws already have in place to stop good policy ideas from inflicting undue harm on smaller employer organizations:

For example:

- 1) Oregon Saves - had a phase in for implementation that was approximately 12-18 months....time for companies to hear about it and learn to adapt.
- 2) Oregon Sick Leave - for this first time applied to all employers - but had a paid/unpaid trigger based on number of employees and whether the company was in the PDX area. Those rules kept severe hardship on employers who could least afford it. It also wisely allowed for existing plans that met the minimum requirements of the law -providing great flexibility to companies.
- 3) OFLA - 25 employer minimum and 12 weeks away....recognized that as a general rule, 25 employees was a signal that the organization could handle the disruption of an absence, and reasonably retain a position until the person could come back. It also recognized by that same rule, a relative level of sophistication inherent in that level of employment

One final policy idea - I have a spouse that works in an Oregon Employer w 50 employees - who has sales people throughout the U.S. They were required by the State of New York, to purchase a short term disability policy for that person. Can we look at weaving that policy idea into the proposed solutions coming through? Even mandating an STD policy and combining it with a 12 week protection requirement would help employers considerably.

In summary and to be clear - many of these small employers lack the means to pay for and administer a proposal of this magnitude. I'd like us to help people as well, but the resources aren't there - especially on this segment of employers - without serious modifications.

Thank you.

Tom Engel

--

Tom Engel

Vantage Point Business Solutions  
P.O. Box 1371  
Beaverton, OR 97075

971-238-2374

[www.vantagepbs.com](http://www.vantagepbs.com)