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Mr. Robert Waterman, Compliance Specialist
Division of Regulations, Legislation, and Interpretation
Wage and Hour, U.S. Department of Labor
Room S-3502
200 Constitution Avenue NW.
Washington, DC 20210
WHDPRAComments@dol.gov

RE: Public comment for RIN 1235-AA13

Mr. Waterman:

The Service Employees International Union (SEIU), a labor organization representing over two million members, strongly supports new reporting requirements established by the Department of Labor's proposed rule implementing Executive Order 13706, Establishing Paid Sick Leave for Federal Contractors. Although the Paperwork Reduction Act of 1995 seeks to minimize the burden of agency reporting requirements on the public, SEIU believes that the proposed requirements in the NPRM would benefit both workers and the public by promoting greater transparency and accountability in federal contracting.

First, the proposed rule (Section 13.21) promotes accountability by requiring federal contractors to include a clause on the Executive Order in all of their federal contracts, as well as in any contracts with subcontractors. This provision guarantees that federal contractors and subcontractors are familiar with the paid sick leave requirements and that they will comply with these requirements "as a condition of payment".

Secondly, the proposed rule (Section 13.25) promotes transparency and accountability by establishing a record of documentation that contractors and subcontractors have, in fact, complied with the Executive Order. Records of employee requests for sick leave, when such leave is used or denied, as well as sick lists of available sick leave assist the agency with both preventing and detecting possible instances of contractor fraud and inaccuracies. In effect, these provisions serve as an added protection for workers.

The attached comments from over 4000 workers also voice support for these "appropriate and much-needed requirements on employers" under the proposed rule. As the comments state, federal contracts are a

“privilege” for the employers receiving them, and every effort must be made to ensure that such contracts are held accountable to federal rules and regulations. Transparency is fundamental to this endeavor.

Sincerely,

John Pruett

Government Relations
Service Employees International Union