

Silicon Valley Council of Nonprofits

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March 6, 2017

To: Supervisor Chavez and County Executive Office

Re: Comments for the Nonprofit Living Wage Policy Public Forum

From: Patricia Gardner, CEO, Silicon Valley Council of Nonprofits

The Silicon Valley Council of Nonprofits supports in concept the proposed County Nonprofit Living Wage Ordinance. We believe the three-year phase-in is a thoughtful implementation plan. We appreciate the due diligence of the County Executive's Office in their review and concerted outreach to nonprofits to fully comprehend the financial impact of implementing a living wage on nonprofits. The draft policy clearly reflects a good understanding of the impact of the living wage on nonprofits and SVCN is supportive of this policy.

However, we have a few comments:

- Allow organizations that provide Dependent Health Care Coverage to request wage credit as an alternate option for tuition reimbursement/professional development or vision and dental coverage.
- We would like greater clarification on county contracts with blended governmental funding that do not allow for living wage rates and how this would be calculated at the time of RFP.
- Please define as it pertains to nonprofit organizations: *"Compensation Contracts and Contracts where reimbursement to the contractor is linked to a match from another government entity, whether or not the revenue is through the County to another entity or utilized directly by the County."*

Waiver for Exemptions

We request the following issues be included in the development of a policy for waiver exemptions:

1. Nonprofit organizations with less than 20 employees
2. Organizations whose increase in pay would impact their employees' ability to collect SSI, housing subsidies for other public benefits
3. Organizations with only one County contract over \$100,000 for which the living wage policy would have undue financial consequences for the entire organization and for which they are the sole provider of that service.

Additionally, as the living wage is implemented, we remain committed to no service reductions based on living wage. Therefore, County Departments need a procedure during the RFP or budgeting process to request additional funding to maintain service levels.

As you have with the nonprofit living wage process, we would expect any future revisions to the policy that the County will provide notification and updates to contractors. We acknowledge that the following issues have not yet been clarified and/or addressed by the County in their living wage policy:

- Labor Peace
- Fair Work Week
- Worker Retention
- Local and targeted hire

SVCN requests that as the County begins to contemplate these issues, we would like to have adequate notification, outreach and opportunity for substantial input into these key labor and employer rights issues. If the County is aware of a timeline to discuss these issues, that you inform us of these developments as well.