

June 15, 2026

Dr. Joylette Portlock, PhD, Chair
Allegheny County Health Department
542 Fourth Avenue
Pittsburgh, PA 15219

Re: Article XXIV Comments (Paid Leave)

Dear Dr. Portlock and Members of the Board of Health:

On behalf of the Pennsylvania Chamber of Business and Industry (PA Chamber), I write to express our opposition to the Proposed Amendment to Article XXIV (Paid Leave).

The PA Chamber is the largest broad-based employer advocacy organization in the Commonwealth, representing around 13,000 member businesses of all sizes, crossing all industry sectors, and in all of Pennsylvania's 67 counties. We appreciate the opportunity to offer our perspective.

This proposal expands Allegheny County's existing paid leave mandate and would require employers in Allegheny County to also provide up to 18 weeks of paid leave following the birth, adoption, or placement of a child. This mandate would apply to employers of all sizes, including small businesses, who would be required to fund and administer this benefit, placing the full financial and operational responsibility on the employer.

Compounding the profound impact on Allegheny County employers is that individuals would be eligible after only 30 days of employment. By comparison, the federal Family and Medical Leave Act (FMLA) requires individuals to have worked for the employer for at least 12 months prior to being eligible. This standard was adopted to ensure individuals had a legitimate and strong connection to the workforce and based on an objective recognition that mandating leave could create real challenges for employers attempting to manage a workplace. After more than 30 years, through both Democratic and Republican Administrations and Congresses, that standard has remained constant.

This proposal in Allegheny County, however, disregards legitimate concerns from the business community and challenges employers will face as they attempt to implement. The length of time, extraordinarily short 30-day eligibility requirement, and generally broad applicability standards would position Allegheny County as perhaps the most extreme and business-hostile jurisdiction in the country and an outlier among practically every other state or municipality that imposes a specific paid leave mandate on its local employers.

This legislation imposes direct and significant costs on Allegheny County employers; as well as additional indirect costs and administrative challenges on employers, who would essentially be prohibited from continuing their own leave policies that benefit their people while accommodating their own unique staffing requirements.

The additional costs and workforce challenges inherent in this bill would be imposed on employers throughout Allegheny County at a time when businesses continue to face labor shortages, rising operating expenses, and economic uncertainty. Extended employee absences already can be difficult to manage, particularly for small and mid-sized employers that may lack the staffing flexibility to absorb vacancies or hire temporary replacements. Employers in many industries, including hospitality, retail, and manufacturing, among others, would now be required to pay two salaries for one job, since many industries cannot simply absorb costs. Employers already struggling to fill open positions may have to somehow recruit individuals for positions that are inherently temporary or pay overtime to existing employees, meaning the labor cost associated with one position will increase by 150 percent.

Some who have likely never signed the front of a paycheck may well-intentionally but obviously conclude this represents progress for workers. In reality, employers may have no choice but to cut services, reduce their workforce, scale back their business, or cease operations entirely – particularly small businesses, employers who operate on thin profit margins, or publicly funded nonprofit organizations with limited or no control over operating revenue.

Beyond the direct cost of funding the benefit, this proposal would create new compliance and administrative challenges for employers. Businesses already manage myriad federal, state, local and internal workplace policies, and adding a unique leave mandate to Allegheny County would require employers, particularly those operating across multiple jurisdictions, to navigate an additional set of rules, policies, and recordkeeping obligations.

More broadly, this proposal risks making Allegheny County a less attractive place to do business. Employers evaluating where to locate, expand, or invest consider labor costs and regulatory obligations, and a costly new employer-funded mandate may place Allegheny County at a competitive disadvantage compared to surrounding communities, including in neighboring Ohio and West Virginia.

Allegheny County's long-term success depends on policies that encourage employers to invest, hire, and grow. While this proposal may be well-intended, we fear it will harm the County in the long run by discouraging investment and economic. Efforts to strengthen the workforce should focus on expanding economic opportunity and supporting a competitive business climate.

For these reasons, the PA Chamber respectfully opposes this proposal.

Thank you for considering our views on this important matter.

Sincerely,

A handwritten signature in black ink that reads "Alex J. Halper". The signature is written in a cursive, flowing style.

Alex Halper
Senior Vice President, Government Affairs
Pennsylvania Chamber of Business and Industry