Dear Ms. Smith:

The Society for Human Resource Management (SHRM) is pleased to submit these comments in response to the request for information (RFI) published in the Federal Register by the Department of Labor’s (DOL’s) Wage and Hour Division (WHD) on July 26, 2017.1 The RFI seeks to gather information to aid the WHD in formulating a proposal to further revise its regulations defining the exemptions in the Fair Labor Standards Act (FLSA) for executive, administrative, and professional (EAP) employees, often referred to as the “white collar” regulations. In addition to SHRM, these comments are endorsed by the 50 SHRM state councils listed on the signatory page.

As explained more fully below, if WHD decides to issue updated regulations defining the EAP exemptions, SHRM believes WHD should retain the current duties tests and salary basis test as the foundation for determining exemption. In any revised regulation, it would be appropriate to adjust the salary level using the same methodology used by WHD in 2004. WHD should not adopt multiple standard salary levels or provide any automatic update mechanism.

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1 Defining and Delimiting the Exemptions for Executive, Administrative, Professional, Outside Sales, and Computer Employees; Request for Information, 82 Fed. Reg. 34,616.
Statement of Interest

Founded in 1948, the Society for Human Resource Management (SHRM) is the world’s largest HR professional society, representing 285,000 members in more than 165 countries. For nearly seven decades, the Society has been the leading provider of resources serving the needs of HR professionals and advancing the practice of human resource management. SHRM has more than 575 affiliated chapters within the United States and subsidiary offices in China, India and United Arab Emirates.

Overview and Context

The RFI largely focuses on a single part of the regulations governing the EAP exemption, the minimum salary level that employees must be paid in order to be eligible for the exemption. This was also the central focus of WHD’s 2016 revisions to the regulations, which were ultimately found to be unlawful by a federal court. While we respond to WHD’s specific questions below, it is important to emphasize that one of the major concerns we had with the 2016 rulemaking was that WHD adopted a new interpretation of the role that the minimum salary level played in the regulations. This new interpretation was then used to justify a minimum salary level that was too high from the perspective of SHRM and our members.

Since at least 1949, the Department has recognized that the purpose of the salary level is to “provid[e] a ready method of screening out the obviously nonexempt employees.” That is, the salary level should be set at a level at which the employees below it clearly would not meet any duties test. Above the level, employees would still need to meet a duties test in order to qualify for exemption. In its 2016 rulemaking, WHD sought to achieve a different purpose, and one fundamentally different than that envisioned by Congress: increasing the number of employees eligible for overtime regardless of whether they performed the duties of executive, administrative, or professional employees.

The responses below are consistent with the comments SHRM filed on WHD’s last notice of proposed rulemaking to revise the regulations in 2015. At that time, SHRM agreed that an increase in the minimum salary level would be appropriate. However, we disagreed strongly with the methodology the WHD employed. Now that the 2016 revisions have been rejected in court, we urge the WHD to restore the minimum salary threshold to its proper role of providing a method of screening out the obviously non-exempt employees, using the methodology employed in the 2004 update.

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2 There are some exceptions to the minimum salary level, such as for teachers in educational establishments and practicing doctors and lawyers.


4 Report and Recommendations on Proposed Revisions of Regulations, Part 541, by Harry Weiss, Presiding Officer, Wage and Hour and Public Contracts Divisions, U.S. Department of Labor (June 30, 1948) at 8.
Responses to Questions Posed in the RFI

1. In 2004 the Department set the standard salary level at $455 per week, which excluded from the exemption roughly the bottom 20 percent of salaried employees in the South and in the retail industry. Would updating the 2004 salary level for inflation be an appropriate basis for setting the standard salary level and, if so, what measure of inflation should be used? Alternatively, would applying the 2004 methodology to current salary data (South and retail industry) be an appropriate basis for setting the salary level? Would setting the salary level using either of these methods require changes to the standard duties test and, if so, what change(s) should be made?

The best option to establish the minimum salary level is that used by the Department in 2004. As described in more detail below, while mechanically applying an inflationary measure offers some convenience, it is not an appropriate way to make periodic adjustments to the salary level because it fails to consider the actual salaries paid in the workplace. Finally, while the duties tests are not perfect, if the Department faithfully applies the 2004 methodology, no change to the duties tests are required at this time.

Apart from the adjustments made in 1975, which were intended to be temporary, DOL has never adopted a salary level by purely applying a measure of inflation, such as the consumer price index. DOL should resist the temptation to do so now. As noted by DOL in 1949, the Department’s regulations “must be drawn in general terms to apply to many thousands of different situations throughout the country. In view of the wide variation in their applicability the regulations cannot have the precision of a mathematical formula.” Simply revising the salary levels by applying an inflationary multiplier would not account for the differences in salary paid to employees in different geographical regions, industries, or among different sized businesses.

Historically, the Department found the salary threshold to be an appropriate proxy for the duties tests when used to screen out employees who would obviously not meet the duties tests in the first place. As such, there was value in the objectivity and simplicity of the salary threshold test. Until the Department’s 2016 revisions, the salary threshold had never been used to limit the application of the exemption to large numbers of employees who will meet the requirements of the duties tests.

The Department should return to its historical methodology, which accounts for differences in pay among geographical regions and industries as well as among different sized employers. After reviewing those pay practices, DOL should then, consistent with past practice, establish a salary level that will not defeat the exemption for a substantial number of individuals.

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In 1958, DOL set the minimum salary “at about the levels at which no more than about 10 percent of those in the lowest-wage region, or in the smallest size establishment group, or in the smallest-sized city group, or in the lowest-wage industry of each of the categories would fail to meet the tests.”\(^6\) DOL used similar methodology in 1963 and 1970. As noted above, DOL departed from this methodology in 1975 when it adjusted the salary level based on the consumer price index. However, as DOL stated at the time, this increase was designed to be in effect for an interim period of time pending the completion and analysis of a study by the Bureau of Labor Statistics.\(^7\) The interim minimum salary levels remained in effect for nearly 30 years.

In 2004, the Department returned to its historical methodology, but instead relied on the lowest 20 percent of salaried employees in the South, rather than the lowest 10 percent. In the 2004 rulemaking, DOL justified this deviation, in part, due to changes in the duties tests. It has been our experience that the adjusted methodology adopted in 2004, in conjunction with the simplification of the duties test made at the same time, work appropriately. Consequently, we encourage DOL to apply the same methodology today to update the salary level. If DOL utilizes the 2004 methodology to update the minimum salary level, then the duties tests do not require further modification.

2. **Should the regulations contain multiple standard salary levels? If so, how should these levels be set: by size of employer, census region, census division, state, metropolitan statistical area, or some other method? For example, should the regulations set multiple salary levels using a percentage based adjustment like that used by the federal government in the General Schedule Locality Areas to adjust for the varying cost-of-living across different parts of the United States? What would the impact of multiple standard salary levels be on particular regions or industries, and on employers with locations in more than one state?**

If the Department applies the 2004 methodology to update the salary threshold, then there is no need for multiple standard salary levels. While it is critically important for DOL to consider data from different regions of the country, different size employers, and different industries, this data should be considered to develop a single standard salary threshold, not to adopt multiple thresholds, which will only serve to increase compliance costs and create confusion for employers and employees alike.

A salary level that is set appropriately for the lowest wage region, or lowest wage industry, will serve adequately in other regions. In addition, having different salary levels will significantly increase compliance costs on businesses as they will necessarily expend resources

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determining which salary level should be applied for each covered employee. No compelling reason has been articulated that would justify this significantly increased burden. The fact is that a single standard salary threshold will always be easier to apply than multiple thresholds.

3. **Should the Department set different standard salary levels for the executive, administrative and professional exemptions as it did prior to 2004 and, if so, should there be a lower salary for executive and administrative employees as was done from 1963 until the 2004 rulemaking? What would the impact be on employers and employees?**

If the 2004 methodology is properly applied to update the salary levels, there is no need for additional salary levels based on the specific exempt duties performed by an exempt employee. Doing so would increase burdens and compliance costs without any clearly identifiable benefits.

4. **In the 2016 Final Rule the Department discussed in detail the pre-2004 long and short test salary levels. To be an effective measure for determining exemption status, should the standard salary level be set within the historical range of the short test salary level, at the long test salary level, between the short and long test salary levels, or should it be based on some other methodology? Would a standard salary level based on each of these methodologies work effectively with the standard duties test or would changes to the duties test be needed?**

As noted above, the standard salary threshold should be determined the same way that it was in 2004. This methodology already appropriately accounts for changes that were made in the duties test in 2004.

In its 2016 revisions, the Department, in part, justified departing from this methodology by arguing that the 2004 methodology inappropriately paired a salary threshold based on the old long test without also limiting the percentage of time spent working on non-exempt tasks. However, the elimination of this element of the long test was appropriately addressed by DOL’s significant adjustment in the methodology of setting the salary level. No further adjustment is necessary.

5. **Does the standard salary level set in the 2016 Final Rule work effectively with the standard duties test or, instead, does it in effect eclipse the role of the duties test in determining exemption status? At what salary level does the duties test no longer fulfill its historical role in determining exempt status?**
As the Eastern District of Texas determined in *Nevada v. Dep’t of Labor*, the Department’s 2016 standard salary level of $913 per week would have operated as a *de facto* salary-only test, thus eclipsing the role of the duties test. As SHRM stated in its comments on the 2015 proposed revisions, DOL improperly inflated the role of the salary threshold test and, as a result, made it the sole arbiter for determining whether an employee is exempt. The result of this is to change the test from excluding the obviously non-exempt into a screen that bars exemption of millions of employees who otherwise perform the duties of exempt executive, administrative, or professional employees. This is particularly true for certain industries, state and local governments and non-profits.

If DOL returns to its 2004 methodology, it will ensure that the salary level is set to perform its intended function and not to exclude large percentages of employees who perform exempt duties.

6. **To what extent did employers, in anticipation of the 2016 Final Rule's effective date on December 1, 2016, increase salaries of exempt employees in order to retain their exempt status, decrease newly non-exempt employees' hours or change their implicit hourly rates so that the total amount paid would remain the same, convert worker pay from salaries to hourly wages, or make changes to workplace policies either to limit employee flexibility to work after normal work hours or to track work performed during those times? Where these or other changes occurred, what has been the impact (both economic and non-economic) on the workplace for employers and employees? Did small businesses or other small entities encounter any unique challenges in preparing for the 2016 Final Rule's effective date? Did employers make any additional changes, such as reverting salaries of exempt employees to their prior (pre-rule) levels, after the preliminary injunction was issued?**

SHRM members spent considerable resources on determining their strategy and plans to come into compliance with the 2016 revisions. It is difficult to generalize the steps employers took in anticipation of the revisions becoming effective because responses varied based on size, industry, budget and other factors. From an implementation perspective, the most common steps that SHRM members took to comply with the 2016 revisions were reclassifying employees from exempt to non-exempt or increasing the salary of particular employees to maintain the exemption. Most employers made these changes for fewer than five percent of their exempt workforce. However, some employers made changes for much higher percentages of their workforce, sometimes eclipsing fifty percent of exempt employees.

**Cost of Increased Salaries in Response to 2016 Revisions**

When asked about the total cost for salary increases made or planned in response to the 2016 revisions, SHRM members also reported a wide range of costs. Some members, especially among nonprofit and public sector employers, did not plan to increase any salaries to
keep otherwise exempt employees above the threshold and thus reported no costs. On the other hand, many employers reported more than $50,000 in costs with some larger employers reporting costs exceeding $1,000,000 with one employer reporting costs of $8,000,000 to increase salaries in order to maintain employee exemptions and otherwise come into compliance with the rule. Of course, the impact of these costs to the organization vary depending on the particular business. For example, one business reported costs of $24,000, but noted that for a small business with a team of twelve people, the cost was significant. In another case, a non-profit organization anticipated expenses that would have exceeded $1,000,000. This nonprofit, because of its business model and number of affected employees, said the expenses would have been so great as to dramatically threaten its business model and threaten the non-profit’s survival.

**Additional Changes Made In Response to 2016 Revisions**

In addition to increasing the salary level of some employees to maintain exempt status, SHRM members reported making the following changes affecting reclassified non-exempt employees:

- Decrease work hours;
- Reduce effective hourly rate so that total pay would remain the same while accounting for usual hours worked;
- Remove eligibility for certain benefits;
- Remove eligibility to earn incentive compensation;
- Require employees to track and report hours worked;
- Redistribute work responsibilities to shift duties to employees who would have remained exempt;
- Reduce access to training programs, especially if travel would have been required;
- Reduce flexible workplace offerings, such as job sharing and part-time exempt work; and
- Remove ability of employees to use mobile devices outside of work hours.

Others reported changes with an organization-wide effect:

- Cancelled plans to expand staff;
Offset payroll costs by reducing employee benefits;

- Downsized US workforce and shifted work overseas.

Representative Comments from SHRM Members

To help DOL understand the impact of the 2016 on employers, we thought it would be helpful to include some quotes that SHRM members provided us in response to a survey. Among the common themes in our members’ comments is the negative impact on employees who were reclassified. This is a concern we raised in 2015, but was largely dismissed by the Department, which seemed to believe that the ability to earn overtime pay or work no more than 40 hours in a week would overcome any negative impact. We hope WHD will take this opportunity to again consider the impact that reclassification can have on workers.

As described by one SHRM member who reclassified employees to non-exempt:

“[W]e made sure the financial impact to [reclassified employees] was zero, we lost some anyway, because they felt it was an insult or a slight, their job having become less important. It forced us to change schedules, to reassign work, to change benefit plans, and to reduce bonuses. We lost at least 25 people, at a cost of at least $125,000. We also had admin costs of at least $75,000 and legal costs of about $50,000. All in, this cost our company about $1,000,000. There was nothing positive that came out of this for the company or for employees. Employees financial change was zero. All costs were borne by the company. That’s a lot of money the company now cannot invest in upgrading facilities, advertising for new customers, and giving raises to those that earned them. What an incredibly expensive waste.”

Members also made the following comments:

- “The affected employees resented being on a time clock when previously they had more flexibility during their work day as to when they arrived, left for the day and length of lunch hours”;

- “We are a community bank and this would have taken away some of the services we would have been able to provide our employees. The result would have been disastrous for us, and we would not have been able to compete with larger banking institutions”;

- “As a non-profit organization, it made it hard to provide the flexible scheduling needed for managers to efficiently and productively do their jobs. Being a 24/7 long term care facility, this made it very difficult to provide supervision for some
supervisors who were reclassified since we could not pay them overtime to check in and supervise off-shift staff”;

• “The financial impact on a non-profit is always a challenge as most of our positions are funded by grants, making it extremely challenging to follow such a rule”;

• “The worst part was employee backlash from moving from exempt to non-exempt. Employees viewed it as a negative change even thought they would be earning overtime. They felt like it was a step back in their careers”;

• “We are a non-profit, based on contributions and this would have hurt our organization by limiting the number of staff we could hire to help serve our members, our community and foreign missions we support”;

• “We are a non-profit that gives services to the homeless population. The amount of service we offer is based on donations received. Payroll cost reduces the amount of services and the number of staff to do this”;

• “The impact was damage to the morale of the employees in the field that were made non-exempt. We did everything we could but however DOL tried to spin it, people felt less favorable towards us as a company once we implemented it”;

• “We lost engagement of some of our employees who had to be changed to nonexempt status due to the new ruling. Once you are exempt and no longer have to track hours it feels like a demotion to have to begin doing it. This was the hardest part for our employees to deal with”;

• “The biggest benefit we can offer our managerial staff is flexibility in their work – this would have eliminated that option”;

• “We are a human service agency primarily Medicaid funded, employing professional staff which would not come close to the … salary level, but require flexibility in work schedule to accommodate the individuals served. The projected overtime costs would have been a significant financial impact to our bottom line; and the gap between our competitive salary versus the proposed salary level was too great to just ‘raise salaries.’ Again, would have been financially devastating to our agency”;

• “The individual who was moved from exempt to non-exempt based on the salary classification felt that he was demoted. That employee was a super employee and hasn’t been since the change occurred. When his pay changed to hourly, he stopped making decisions and it has negatively impacted his performance”;
• “We lost many key employees and some potential hires. Paying management personnel by the hour, rather than salary was deemed inferior by employees, even if the weekly amounts were equal”; and

• “Getting our managers to clock in and out was an effort that is still ineffective.”

Post-Injunction Impact

After the preliminary injunction was issued, it appears that the majority of SHRM members did not reverse their decisions to increase pay to maintain the exempt status of employees or reclassify employees as nonexempt. However, a considerable minority did reverse classification decisions to restore exempt status and some of the flexibility and benefits that employees had been subject to as a result of re-classification.

7. Would a test for exemption that relies solely on the duties performed by the employee without regard to the amount of salary paid by the employer be preferable to the current standard test? If so, what elements would be necessary in a duties-only test and would examination of the amount of non-exempt work performed be required?

While job duties may be the most important part of the test to determine whether an employee is a bona fide executive, administrative, or professional employee, SHRM does not support a duties-only test for the vast majority of executive, administrative, and professional employees. While there are some very narrow exceptions to the salary level test that may be appropriate, such as for teachers in educational institutions or practicing doctors and lawyers, SHRM does not support expansion of these exceptions at this time.

In addition, we are concerned that a move toward duties-only tests might cause the Department to further modify the duties tests in some way. Employers have spent a lot of time learning how to apply the duties test appropriately. Any changes will certainly increase FLSA litigation at a time when such litigation is already exploding.

8. Does the salary level set in the 2016 Final Rule exclude from exemption particular occupations that have traditionally been covered by the exemption and, if so, what are those occupations? Do employees in those occupations perform more than 20 percent or 40 percent non-exempt work per week?

Among the most important types of jobs impacted by the salary level increase in the 2016 revisions is part-time exempt positions. The Department has not interpreted its rules to permit proration of the minimum salary level for employees who regularly work part-time. Consequently, an employee who performs exempt duties and earns a salary of $750 per week
for a two-day schedule could be exempt under the 2004 rules, but would not be exempt under the 2016 revisions.

The Department’s question indicates that it is at least seeking information regarding whether it should restore an element of the old long test that considered the amount of time an employee spends performing non-exempt work each week. This prong of the test was appropriately abandoned in 2004 and should not return. The percentage of time spent performing exempt versus non-exempt tasks is inconsistent with a test that considers the employee’s primary duty.

In 2004, the Department also adopted a “concurrent duties” provision that should not be revisited. While this provision was adopted as part of the 2004 revisions, it was not a new concept at the time. In fact, prior to the adoption of the 2004 revisions, many court decisions had embraced the view that an individual’s primary duty may be management even though he or she spent considerable time performing non-exempt tasks.8

Furthermore, the Department should recognize that many employers today operate within flatter organizational structures, with fewer staff in support roles and many employees performing a combination of exempt and non-exempt work. In fact, in our comments on the Department’s proposed revisions in 2015, we cited a SHRM member poll which indicated that two-thirds of organizations employ exempt employees who must regularly conduct non-exempt tasks. Of those organizations, four out of five reported that up to 40% of their total exempt workforce must perform non-exempt work while simultaneously conducting exempt work.

While this phenomenon occurs in many workplaces, it is even more common for nonprofits and small businesses to employ a workforce that must pitch in and work at the front desk, answer client phone calls and check in on clients. If overtime regulations are modified to eliminate ability of employees to perform concurrent duties and maintain their exempt status or to return to the old long-tests rigid formulations, many organizations would need to be restricted in ways that diminish the services being provided.

9. The 2016 Final Rule for the first time permitted non-discretionary bonuses and incentive payments (including commissions) to satisfy up to 10 percent of the standard salary level. Is this an appropriate limit or should the regulations feature a different percentage cap? Is the amount of the standard salary level relevant in determining whether and to what extent such bonus payments should be credited?

We appreciate and commend the Department’s willingness to consider inclusion of nondiscretionary bonuses toward the minimum salary level. However, SHRM believes that the

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proposal adopted as part of the 2016 revisions was too limited to be of much utility as few nondiscretionary bonus plans are likely to meet the strict tests adopted by the Department. Increasing the portion of the minimum salary level that could be paid through nondiscretionary bonuses and lengthening the period over which such payments must be made would make this option more attractive for a greater variety of employers. Having said that, today the majority of employees who receive incentive payments are those who would otherwise qualify for an exemption.

10. Should there be multiple total annual compensation levels for the highly-compensated employee exemption? If so, how should they be set: by size of employer, census region, census division, state, metropolitan statistical area, or some other method? For example, should the regulations set multiple total annual compensation levels using a percentage based adjustment like that used by the federal government in the General Schedule Locality Areas to adjust for the varying cost-of-living across different parts of the United States? What would the impact of multiple total annual compensation levels be on particular regions or industries?

For the same reasons discussed above with respect to the standard salary level, the Department should not adopt multiple total annual compensation levels for the highly-compensated employee exemption.

It should be noted that while the highly-compensated employee test has served a useful purpose in defending misclassification allegations for highly paid workers, few employers utilize the highly-compensated employee test for purposes of classification. Little would be served by making the highly-compensated employee test more complicated.

10. Should the standard salary level and the highly-compensated employee total annual compensation level be automatically updated on a periodic basis to ensure that they remain effective, in combination with their respective duties tests, at identifying exempt employees? If so, what mechanism should be used for the automatic update, should automatic updates be delayed during periods of negative economic growth, and what should the time period be between updates to reflect long term economic conditions?

No, neither the standard salary test nor the highly-compensated employee total annual compensation level should be automatically updated. Automatically updating the salary levels will pose practical problems for employers setting effective compensation practices and not appropriately account for workforce changes.

First, SHRM members have expressed significant concern that automatic increases in the salary threshold could pose real practical challenges to effective compensation practices. Regularly mandated inflationary increases would significantly impair the ability of employers to
manage merit increases for employees at or near the salary threshold. In our 2015 comments, we provided the following example:

Consider an employer with a pool of ten exempt employees performing similar jobs earning $975 per week ($50,700 per year) in 2016, above the proposed salary level of $970. The employer budgets a three percent increase for annual salary increases, which is a total pool of about $15,210. The employer may wish to provide the same three percent increase to all employees, or it may decide to base salary adjustments on merit, awarding higher raises to good or excellent performers and lower increases or no increase to average or poor performers.

However, consider the impact of a mandated two percent increase in the salary threshold. In this example, an employer would be required to adjust all ten salaries up to $989 per week in order to maintain their exempt status, reducing the total amount available for merit increases to $7,930. While the employer could still distribute the remaining funds in the manner it sees fit, by utilizing almost half of the budgeted funds with mandated increases, it will be harder to award larger increases to excellent performers.

This is one reason why automatic updates are likely to cause significant salary compression issues, especially as implemented over time. After several years of mandated salary level increases, the gap in pay between more senior and less senior, more experienced and less experienced, or more productive and less productive employees will become smaller over time, creating significant morale problems and other management challenges.

In addition, we are concerned that automatic adjustments to the salary threshold will not account for the ways in which the workforce changes over time. National average salaries may continue to rise, but this does not mean that all salaries in all industries and in all regions will also rise at the same rate and at the same pace. Ensuring that adjustments to the minimum salary threshold are made through notice and comment rulemaking helps ensure that geographical and sectoral disparities are accounted for. The burden should be on the Department to carefully examine the impact of any new salary threshold, including regional and sectoral disparities, and allow for public comment before it is implemented.

Conclusion

The Society for Human Resource Management would support an increase in the minimum salary level utilizing the same methodology employed by WHD in 2004. If done correctly, no changes to the duties tests are needed at this time. In addition, we do not support automatic updates of the salary level test or the annual salary for highly compensated employees as such changes should only be done through notice and comment rulemaking after an analysis of the proposed impact on different sectors of the economy and different geographic regions.
Thank you for your consideration of these comments.

Respectfully Submitted,

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**SHRM State Councils**

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