

CONNECTICUT CAMPING ASSOCIATION  
*The Voice of Organized Camping in Connecticut Since 1965*  
[www.ctcamps.org](http://www.ctcamps.org)

Dear Co-Chairs Senator Kushner, Representative Porter, and members of the Labor and Public Employees Committee:

My name is Keith Garbart and I am writing on behalf of the Connecticut Camping Association (CCA) in regard to S.B. No. 2 "An Act increasing the minimum fair wage," H.B. No. 5004 "An Act increasing the fair minimum wage," and H.B. No. 7191 "An Act increasing the minimum wage." Unfortunately, as currently written, the CCA must oppose the proposed bills in regard to increasing the minimum wage.

While CCA understands the increase for a living wage increase we do feel that certain exemptions, or waivers, should be given to summer camp seasonal employees. Currently there is no such exemption in place for summer camp counselors who work seasonally for only two or three months in a resident or day camp setting.

We feel that the continued increase in minimum wage requirements will place undue hardships on camps with limited budgets and either force them to increase fees or just shut down completely because of rising costs of staffing. Summer camps are licensed by the State of Connecticut and therefore must maintain certain ratios of counselors to campers so we must continue to keep our staffing levels the same and cannot simply cut staff to stay within our budgeted salaries. Also taking into account that all resident camps are also essentially paying room and board to their counselors which needs to be factored in so any increase in minimum wage would affect a counselor's salary. The increase in minimum wage will force camps to make decisions about staffing and potentially have to make decisions to decrease the number of staff and therefore the number of campers they can serve.

Just to give you an idea on how some of the numbers would project for camps we are providing information on a sampling of different types of camps throughout Connecticut:

*Independent Non-Profit Day Camp (650 Campers) (160 staff)*

\$10.10 minimum wage – Program Salaries = \$463,000

\$12.00 minimum wage – est. Program Salaries = \$546,340 = 18% increase

\$15.00 minimum wage – est. Program Salaries = \$682,925 = 25% increase

*YMCA Non-Profit Day Camp (400 campers) (90 staff)*

\$10.10 minimum wage – est. Program Salaries = \$247,300

\$12.00 minimum wage – est. Program Salaries = \$291,814 (18%)

\$15.00 minimum wage – est. Program Salaries = \$364,767 (25%)

*YMCA Non-Profit Resident Camp (400 campers) (180 staff)*

\$10.10 minimum wage – Program Salaries = \$956,457

\$12.00 minimum wage – est. Program Salaries = \$1,128,619 (18%)

\$15.00 minimum wage – est. Program Salaries = \$1,410,472 (25%)

These changes will dramatically increase program salaries for camps in which almost 50% of a camps operating expenses are spent on salaries. While we do understand how increases in minimum wage are important for working families, we are hopeful that we can come to a fair compromise that the sixteen-year-old first-time counselor is not supporting a family as their first job in most cases. In order to cover the salary increases a rise in camp fees will have to be passed on to families as well as taking into account rising costs of transportation, food services, supplies, and other services the camp needs to purchase in order to run their programs. In some cases, camps will not be able to operate at the higher levels or will cut services and opportunities will be lost for families in need of camp or child care.

Summer camps want to pay a fair competitive wage to their seasonal employees and we also understand that in order to be competitive for staff we will always need to pay a fair wage. One example is being able to pay a training wage for those staff under age 18 for up to 200 hours. This would be something we would also like to be looked at as the 200 hours in a camp setting either resident or day camp gets used rather quickly and would kick in mid-summer in most cases. We like the idea of the number of hours increasing or switch it to a number of days working as in the Governors proposal of ninety days. This would in turn give a camp the flexibility of possibly hiring an under 18-year-old seasonal counselor for one summer for 85% of the minimum wage and then when they return for a second summer, they would be at minimum wage in year two. So, while technically camps can currently take advantage of this exception to the minimum wage, in practice it does not really work due to the hours required to work especially in a resident camp setting.

Finally, another compromise could be worked out as in Massachusetts, we would like to see language adopted for exemptions, or waivers, for seasonal summer camp employees. The State of Massachusetts recently enacted a law to do just that. According to the Massachusetts Department of Labor Standards 454 CMR 27.06 (2) states:

*(2) Seasonal Camp Counselors and Counselor Trainees. The Director may, in accordance with M.G.L. c. 151, § 7, issue to any seasonal camp a waiver permitting payment of less than the minimum wage to seasonal camp counselors or counselor trainees for such period of time as shall be fixed by the Director and stated in the waiver. In order to receive a waiver, a camp must provide to DLS information regarding the seasonal nature of the business, the sub-minimum wage sought, and whether the camp will provide food and lodging to the employees, and the number of counselors for whom a waiver is sought. An employee shall be considered a seasonal camp counselor or counselor trainee if the employee is directly involved in camp programming and camper supervision. A waiver of the basic minimum wage shall not apply to employees who work as dish washers, kitchen workers, maintenance workers, life guards or other jobs that do not entail the direct supervision of campers. Seasonal camps seeking a minimum wage exemption must apply annually for a waiver from the Director.*

The CCA feels that something similar can be applied in Connecticut to help camps be able to still pay a fair wage to its seasonal employees and still provide a quality summer

camp experience to all children of Connecticut in a Fun and Safe environment. The Connecticut Camping Association is opposed to the minimum wage proposed schedules as written without exemptions or changes in current exceptions in place for summer camp counselor or seasonal employees. The magic of camp is special and we all just want to make sure we can still be able to offer our services to all children in our state and not have to cut opportunities due to rising staff costs.

I appreciate your time and we are more than willing to answer any questions regarding this topic or provide further information. I can be reached by email at [keith@windingtrails.org](mailto:keith@windingtrails.org) or by phone at (860) 677-8458 ext. 14. Thank you for your time and consideration.

Respectfully Submitted,



Keith Garbart  
Connecticut Camping Association

