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To: [West, Danielle@Labor](mailto:West_Danielle@Labor)
Subject: Employer Perspective on Proposed PAGA Regulatory Changes
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Hi Danielle,

I hope you're doing well. I wanted to share some perspective from the standpoint of a small-to-medium California employer, especially in light of the recently proposed PAGA-related regulations announced by the Labor Workforce Development Agency.

I reviewed the recent Notice of Proposed Rulemaking and supporting materials (linked below), and it prompted me to reach out:

- Proposed Notice of Regulatory Action:
https://www.labor.ca.gov/wp-content/uploads/sites/338/2026/02/2026-2-6-Ntc_Prop_Rulemaking_LWDA_PAGA-Z2026-0121-03.pdf
- LWDA PAGA Rulemaking Resources:
<https://www.labor.ca.gov/resources/paga/rulemaking-labor-code-private-attorneys-general-act-of-2004/>

As a small business owner employing around 65 people, I work hard to stay compliant and create a workplace that supports my team and contributes positively to the local economy. I genuinely strive to follow every rule, but the continual revisions, frequent updates, and volume of requirements make it increasingly difficult to stay current despite our best efforts.

For employers acting in good faith, this level of complexity can be particularly challenging. The risk of exposure created by technical or unintended violations — especially when regulations shift or lack clarity — can be significant even when there is no harmful conduct. There often seems to be little distinction between bad actors and employers who are doing their best to comply.

Another concern is that the current enforcement structure can sometimes encourage litigation based on technicalities or claims that don't reflect actual workplace issues. When resources must be directed toward responding to claims that are disproportionate or unfounded, it takes away from the funds we would otherwise reinvest into our team, operations, and the revenue and jobs that ultimately support the state.

I believe there is an opportunity for the state to consider more balanced approaches, clearer guidance, and some measure of grace for employers who demonstrate genuine efforts to comply. Any insight you have, or any steps you'd recommend for ensuring the employer perspective is represented in discussions surrounding these proposed regulations, would be greatly appreciated.

Thank you for taking the time to consider this. I am committed to running a responsible and

compliant business, and more clarity and stability in the regulatory framework would be incredibly helpful for employers like us who are striving to do things the right way.

Warm regards,

Jodi Cain

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