

## Office of Labor Standards Feasibility Report

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August 28, 2025



**King County**

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## II. Proviso Text

Of this appropriation, \$50,000 shall not be expended or encumbered until the executive transmits a report on the feasibility of creating a county office of labor standards to enforce county ordinances related to labor standards for the employees of any employer in unincorporated King County, other than King County.

The report shall include, but not be limited to:

- A. Identification of the current county code that establishes wage, labor, or workforce practices for employees of any employer in the unincorporated areas of King County, other than King County, and the agencies responsible for enforcement of that code;
- B. Identification of operational, policy, and legal considerations for creating a county office of labor standards;
- C. A recommendation on where or how such an office should be housed organizationally in the county; and
- D. Estimates of the county's costs to create and operate an office of labor standards.

The executive should electronically file the report by September 1, 2025, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff, and the lead staff for the local services and land use committee or its successor.

Ordinance 19861, Section 16, Office of Performance, Strategy, and Budget, P3 <sup>1</sup>

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<sup>1</sup> Ordinance 19861 [\[King County - File #: 2024-0299\]](#).

### III. Executive Summary

This report responds to a budget Proviso in Ordinance 19861, Section 16, P3 requiring transmittal of a report on the feasibility of creating a County Office of Labor Standards (OLS) to enforce County ordinances related to labor standards for the employees of any employer in unincorporated King County (UKC), other than King County. This report was developed by the Office of Performance, Strategy and Budget (PSB).

King County Code (KCC) contains approximately a half dozen wage, labor, and workforce standards. No central organization within King County government oversees compliance with these requirements, as responsibility is assigned to various County agencies. Offices seeking to promote compliance with labor standards have been established in a variety of jurisdictions, including the City of Seattle.

Establishing an OLS within King County government would require that King County address a variety of operational, policy, and legal considerations, as summarized below and outlined in this document.

- Policy:
  - Mission
  - Covered regulations
  - OLS activities/actions
- Operational:
  - Budget and number/type of staff full time equivalents (FTEs)
  - Office location
  - Implementation plan
  - Enforcement mechanisms and roles
- Legal:
  - Required code changes and Prosecuting Attorney Office (PAO) support needs
  - Human and Civil Rights Commission recommendations on the Civil Rights Program

The estimated cost of a King County OLS varies based on policy and operational considerations. PSB estimates that establishment of an King County OLS would involve a range of one-time costs of between \$525,000 and \$850,000 and ongoing costs of between approximately \$1 million per year for a limited scale of activities (i.e., receive complaints, provide referrals, investigate limited number of complaints, perform limited outreach), and \$7 million annually for comprehensive office activities (i.e., receive and investigate complaints, pursue enforcement, conduct outreach and education, provide technical assistance). Based on PSB's analysis performed for this report, if the office were created it could be located within either DLS, DES, or OERSJ.

The information contained in this report was derived from interviews with key King County staff, research on such offices in other jurisdictions, documentation provided by the City of Seattle on its OLS, and prior work related to the King County Minimum Wage Ordinance and Unincorporated King County Retailer Cash Requirement Implementation and Enforcement Plan.

### IV. Background

#### Department Overview:

The following departments provided input for this Proviso response or are relevant to the information discussed.

- The **Office of Performance, Strategy and Budget (PSB)** provides comprehensive and regional planning, management, budgeting, and performance assessment for King County government. PSB's work is guided by equity and social justice principles, as well as best practices in financial stewardship and performance management, which includes enhancing accountability and transparency and integrating strategic planning, project management, resource allocation, and continuous improvement into a systematic approach throughout the County.
- The **Department of Local Services (DLS)** consists of the Director's Office, Roads Services Division, and Permitting Division. The Director's Office leads the department, providing central support for its two divisions and overseeing department activities related to the provision of local services in UKC. The Director's Office also oversees subarea planning and community liaison, participatory budgeting, and economic development programs and coordinates with other agencies to engage with UKC communities, co-create responses to community needs, and respond to customer service requests.
- The **Department of Executive Services (DES)** provides internal services to King County government and a variety of public services to its residents. DES includes several divisions/offices, including the **Finance and Business Operations Division (FBOD)**. FBOD provides services to County agencies, businesses, and taxpayers including:
  - Business development and contract compliance.
  - Financial management services and treasury operations.
  - Procurement and payables.
- The **Office of Equity and Racial and Social Justice (OERSJ)** includes the **County's Civil Rights Program**, which performs the following activities:
  - Enforcing the County's nondiscrimination ordinances.<sup>2</sup>
  - Supporting Americans with Disabilities Act (ADA) and Rehabilitation Act Section 504 compliance.
  - Coordinating County responses to federal Civil Rights Title VI issues.

Among other activities, OERSJ staffs the 504/ADA Committee, Human and Civil Rights Commission, and Immigrant and Refugee Commission and leads the County's language access program. It is working to develop an updated Equity and Social Justice Strategic Plan.

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<sup>2</sup> The Civil Rights Program investigates and the following: KCC 12.17 – Discrimination in Contracting, 12.16 – Fair Employment Practices, 12.20 – Open Housing, and 12.22 – Discrimination in Places of Public Accommodation. The Program also investigates complaints under the federal Title VI of the Civil Rights Act (discrimination in federally funded programs and services) and Title II of the Americans with Disabilities Act (equal access to services offered by the County). Links to these KCC sections are contained in Table 1.

## Key Historical Context:

KCC includes several sections that regulate wage, labor, and workforce in the UKC, including the recently passed regulations on living wages<sup>3</sup> (2019) and the minimum wage<sup>4</sup> (2024). The King County Office of Labor Relations (OLR) negotiates approximately 80 labor agreements covering the County's approximately 12,500 represented employees. However, OLR, as currently constituted, does not play a role in enforcing wage, labor, or workforce codes for businesses in the UKC.

The City of Seattle has an Office of Labor Standards, which was established first in 2011 as part of the Seattle Office for Civil Rights, became its own office in 2015. Seattle's OLS seeks to advance labor standards through thoughtful community and business engagement, enforcement, and innovation, with a commitment to race and social justice.<sup>5</sup>

## Key Current Context:

The unincorporated area of King County has a population of about 250,225 people,<sup>6</sup> contains approximately 44,300 covered jobs (see footnote for definition of covered jobs),<sup>7</sup> and about 5,850 workplaces (excludes public sector government and education employers).<sup>8</sup> Of these workplaces, approximately 68 percent consist of businesses with fewer than five jobs, and less than one percent involve more than 100 jobs.

KCC contains approximately a half dozen wage, labor, and workforce standards, which are detailed further in Table 1.<sup>9</sup> Implementing these various regulations has been the purview of several different King County departments or agencies for the various regulations.

While King County does not have an OLS, other jurisdictions do have such offices. Appendix A provides information on the mission, covered regulations, office activities, and costs for some such offices.

## Report Methodology:

This report was prepared by PSB, with support from other King County departments. The report reflects insights from key King County staff in DLS, PSB, the Executive Office, the Office of Labor Relations, OERSJ, and the Prosecuting Attorney's Office (PAO). The interviews with King County staff provided

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<sup>3</sup> Living Wage Ordinance 18871, 2019 - [aqua.kingcounty.gov/council/clerk/code/05 Title 2.htm#e297](https://www.kingcounty.gov/council/clerk/code/05%20Title%202.htm#e297).

<sup>4</sup> Minimum Wage Ordinance 19762, 2024 - [Title 12 - PUBLIC PEACE, SAFETY AND MORALS](#).

<sup>5</sup> Seattle Office of Labor Standards web site: [Office of Labor Standards - LaborStandards | seattle.gov](https://www.seattle.gov/office-of-labor-standards).

<sup>6</sup> Office of Financial Management April 1 Populations Estimates, 2020: [April 1 official population estimates | Office of Financial Management](#).

<sup>7</sup> Puget Sound Regional Council Covered Employment Estimates, 2024. Covered employment refers to jobs "covered" under the state's Unemployment Insurance Program. The Act exempts from covered employment the self-employed, proprietors and corporate officers, military personnel, and railroad workers, so those categories are not included in the dataset. Covered jobs constitutes 85-90 percent of total employment: [Covered Employment Estimates | Puget Sound Regional Council](#).

<sup>8</sup> As a point of comparison, the City of Seattle has a population of approximately 816,000, about 638,300 covered jobs, and 30,800 workplaces (same information sources as UKC data – see footnotes above). Of these workplaces, approximately 61 percent have fewer than five jobs, and about three percent involve more than 100 jobs.

<sup>9</sup> As a point of comparison, the City of Seattle OLS enforces about 19 wage, labor, and workforce codes.

information on operational, policy, and legal considerations associated with the feasibility of a potential OLS; where such an office should be housed organizationally in the County government; and estimates of the costs to create and operate an OLS.

This report draws on cost estimates for one-time and ongoing costs for the enforcement of King County's Minimum Wage Ordinance 19762, provided to the King County Council in September of 2023. The cost estimates were reviewed by PSB.

KCC sections applicable to this proviso are listed below and detailed in Section V.A of this report.

- Living Wage – KCC 2.94
- Discrimination and Equal Employment Opportunity in Employment by Contractors, Subcontractors and Vendors – KCC 12.16
- Discrimination in Contracting – KCC 12.17
- Fair Employment Practices – KCC 12.18
- Minimum Wage – KCC 12.18B
- Licensing Requirements – KCC 6

## V. Report Requirements

This report is organized to align with the Proviso requirements, which are listed below.

- A. Identification of the current county code that establishes wage, labor, or workforce practices for employees of any employer in the unincorporated areas of King County, other than King County, and the agencies responsible for enforcement of that code;
- B. Identification of operational, policy, and legal considerations for creating a county office of labor standards;
- C. A recommendation on where or how such an office should be housed organizationally in the county; and
- D. Estimates of the county's costs to create and operate an office of labor standards.

### **A. Identification of Current County Code that Establishes Wage, Labor, or Workforce Practices for Employees of Any Employer in the Unincorporated Areas of King County, Other Than King County, and the Agencies Responsible for Enforcement of that Code**

KCC sections that regulate wage, labor, or workforce practices in the UKC and responsible County agencies are summarized in Table 1 below. The information in Table 1 was developed by the PAO.

Table 1 - King County Codes Establishing Wage, Labor, and Workforce Requirements for UKC Businesses

Code	Description	Applicable Agency and Enforcement
Minimum Wage (KCC 12.18B <sup>10</sup> )	Requires employers whose employees perform work in the UKC to pay a statutorily defined minimum wage for that work.	<ul style="list-style-type: none"> <li>DLS conducted public notice and comment rulemaking<sup>11</sup> and communications<sup>12</sup> on the minimum wage in 2024 and 2025.</li> <li>The Code delegates enforcement to DLS, but DLS has not initiated enforcement and there is no budget for enforcement.</li> <li>Enforcement is available through a private right of action.<sup>13</sup></li> </ul>
Living Wage (KCC 2.94 <sup>14</sup> )	Requires contractors to pay employees working on County contracts the minimum wage.	<ul style="list-style-type: none"> <li>The Code delegates implementation and enforcement to FBOD.</li> </ul>
Fair Employment Practices (KCC 12.18 <sup>15</sup> )	Prohibits discrimination based on disability, race, color, age, gender, marital status, sexual orientation, gender identity and other protected statuses.	<ul style="list-style-type: none"> <li>The Code delegates enforcement to OERSJ's Civil Rights Program.</li> <li>This Code applies to UKC businesses employing more than eight people<sup>16</sup> and to King County operations in the UKC.</li> </ul>
Discrimination: Contractors (KCC 12.16 <sup>17</sup> )	Requires equal employment and prohibits discrimination by County contractors.	<ul style="list-style-type: none"> <li>The Code delegates implementation and enforcement to FBOD.</li> <li>Code also allows enforcement through private right of action.</li> </ul>
Discrimination: Contracting (KCC 12.17 <sup>18</sup> )	Prohibits discrimination in contracting.	<ul style="list-style-type: none"> <li>Complaints are investigated and enforced by OERSJ.</li> </ul>
Business & Licensing (KCC 6 <sup>19</sup> )	Includes labor standards or protections for employees. <sup>20</sup>	<ul style="list-style-type: none"> <li>Enforcement and implementation of the bulk of Section 6 is assigned to DLS.</li> </ul>

<sup>10</sup> Minimum Wage Ordinance 19762, 2024 - [Title 12 - PUBLIC PEACE, SAFETY AND MORALS](#).

<sup>11</sup> Minimum wage rules: [MWO Rule Final 03 01 25.docx.pdf](#).

<sup>12</sup> [Minimum wage in unincorporated King County - King County, Washington](#).

<sup>13</sup> A private right of action is a legal tool that grants an individual or private party the authority to file a civil lawsuit against another party or a business for alleged harm. It outsources enforcement actions to private lawyers rather than government agency officials: [What Is a Private Right of Action - ILR](#).

<sup>14</sup> Living Wage Ordinance 18871, 2019 - [aqua.kingcounty.gov/council/clerk/code/05 Title 2.htm#e297](#).

<sup>15</sup> Fair Employment Practices Ordinance 7430 (1985), 9615 (1990), 15399 (2006), 18670 (2018): [Title 12 - PUBLIC PEACE, SAFETY AND MORALS](#).

<sup>16</sup> Excludes religious/sectarian organizations not organized for profit and governmental entities other than KC.

<sup>17</sup> Discrimination and Equal Employment Opportunity by Contractors, Subcontractors, and Vendors, Ordinance 4528 (1979), 11992 (1995), 12787 (1997), 15971 (2007), 16855 (2010), 18230 (2016), 18672 (2018), 19738 (2023): [Title 12 - PUBLIC PEACE, SAFETY AND MORALS](#).

<sup>18</sup> Discrimination in Contracting, Ordinance 13981 (2000), 15399 (2006), 15971 (2007), 18230 (2016), 18670 (2018), 19026 (2019), 19541 (2022) [Title 12 - PUBLIC PEACE, SAFETY AND MORALS](#).

<sup>19</sup> [Title 6 - BUSINESS LICENSES AND REGULATIONS](#).

<sup>20</sup> For example, employees at massage parlors and adult entertainers must be 18 and operators of these facilities must obtain and maintain proof of their employees' age.



## B. Identification of Operational, Policy, and Legal Considerations for Creating a County Office of Labor Standards

Several King County staff interviewed for this report were asked for insights on operational, policy, and legal considerations associated with creating an OLS within King County to enforce wage, labor, and workforce regulations for businesses in the UKC. While specific feedback varied among staff interviewed, there was alignment on the considerations raised. The considerations identified in this report are an aggregation of input from interviewed staff.

Operational, policy, and legal considerations are presented in Tables 2, 3, and 4 below. Operational considerations include the office location (branch, agency, organizational structure/level), the appropriate budget and number of staff (FTEs), funding sources, implementation plan, and structure of legal support. Policy considerations consist of the OLS mission, covered regulations, and OLS activities and role, including potential contracting out for some services and development of partnerships with other jurisdictions. Legal considerations include the need for legal work to create the office, define its regulatory authority, and establish enforcement regulations and penalties. An additional legal consideration is noted regarding potential implications of ongoing work by the Human and Civil Rights Commission on its recommendation for the location of the County's Civil Rights Program.

Table 2 - Operational Considerations

Consideration	Options
Determine placement in KC government.	<ul style="list-style-type: none"><li>• Executive branch</li><li>• Legislative branch</li><li>• Independent agency</li></ul>
If in executive branch, determine home agency.	<ul style="list-style-type: none"><li>• DLS</li><li>• DES</li><li>• OERSJ</li><li>• Some combination of the above</li></ul>
If in executive branch, determine organizational structure.	<ul style="list-style-type: none"><li>• In Director's/Administrative Office</li><li>• In existing division</li><li>• In a new division</li></ul>
Determine the budget/FTE authority consistent with covered regulations and scope of office activities.	<ul style="list-style-type: none"><li>• Approximately \$1M and 2-4 FTEs</li><li>• Approximately \$5-6M and 15-20 FTEs</li><li>• Something in between</li></ul>
Identify potential funding sources.	<ul style="list-style-type: none"><li>• General Fund</li><li>• Fees/fines for violations and amount</li><li>• Combination of above</li></ul>
Establish a plan for implementation.	<ul style="list-style-type: none"><li>• Phased implementation/pilot activities</li><li>• Full implementation at outset</li></ul>
Identify how to provide legal support.	<ul style="list-style-type: none"><li>• PAO</li><li>• Staff within OLS</li><li>• Combination of the above</li></ul>

Table 3 - Policy Considerations

Consideration	Options
Clarify OLS mission.	<ul style="list-style-type: none"> <li>Promote compliance with labor standards</li> <li>Develop policy/contribute to proposals for new standards</li> <li>Coordinate with county offices/boards (e.g., Agricultural Commission)</li> <li>Combination of the above</li> </ul>
Identify regulations to be enforced.	<ul style="list-style-type: none"> <li>All KC labor regulations</li> <li>KC labor regulations excluding civil rights</li> <li>State regulations</li> <li>Federal regulations</li> <li>Combination of the above</li> </ul>
Determine what functions OLS will perform.	<ul style="list-style-type: none"> <li>Build awareness and respond to questions</li> <li>Provide limited assistance and referral to courts for right of private action</li> <li>Receive and triage complaints</li> <li>Investigate complaints and follow-up to ensure compliance<sup>21</sup></li> <li>Conduct random or targeted audits</li> <li>Provide general or targeted outreach and education</li> <li>Provision technical compliance assistance or mediation services<sup>22</sup></li> <li>Promote enforcement through fees/fines or other means<sup>23</sup></li> </ul>
Clarify role.	<ul style="list-style-type: none"> <li>Contract for outreach, education, and/or engagement</li> <li>Collaborate with City of Seattle</li> <li>Provide fee for service to other cities</li> </ul>

Table 4 - Legal Considerations

Consideration	Options
Identify and implement needed KCC changes.	<ul style="list-style-type: none"> <li>Establish in KCC and move some or all authority to OLS</li> <li>Establish enforcement regulations<sup>24</sup></li> <li>Establishing fees/fines</li> </ul>
Determine impact of work of Human & Civil Rights Commission. <sup>25</sup>	<ul style="list-style-type: none"> <li>Wait for the Commission recommendation on the Civil Rights Program</li> <li>Work with the Commission on role of OLS in civil rights enforcement</li> <li>Move ahead implementing OLS</li> </ul>

<sup>21</sup> Included in this consideration is determining whether an investigation looks only at the regulation noted in the complaint or whether it investigates all labor code compliance.

<sup>22</sup> If these services are included in the OLS scope of work, then the Office should develop a process for employers/employees/community seeking assistance; reviewing, tracking, and responding to requests; legal review; and inclusion of disclaimers to make it clear that the interpretive guidance applies only to the limited set of facts presented.

<sup>23</sup> Included in this consideration is whether enforcement is carried out by the OLS or by the PAO.

<sup>24</sup> Work would include revision of 12.18B to correct any errors or ambiguities identified during implementation of the Ordinance and adding enforcement provisions and promulgation of new rules as well as development of associated FAQs and communication plans.

<sup>25</sup> In Ordinance 19770, the King County Council passed legislation establishing the Human and Civil Rights Commission and charging the Commission with identifying where the Civil Rights Program should be housed within County government.

### **C. A Recommendation on Where or How Such an Office Should Be Housed Organizationally in the County**

Where an OLS should be housed depends on the outcomes of the policy decisions noted above.

If OLS is housed within the legislative branch, legal analysis would be required to ensure that the County Charter allows such an office to be in the legislative branch. If the OLS is housed in the executive branch and it includes the investigation of civil rights complaints against King County agencies or operations in the UKC, structures and systems should be established to address potential conflicts of interest, such as an agency investigating its own operations or contracted work.

Regarding potential locations within the executive branch, if the Office focuses solely on labor standards for businesses in the UKC, then the OLS could be housed in DLS because the UKC focus aligns with DLS mission and enforcement of civil rights complaints against King County and King County labor unions by employees could remain with OERSJ. However, if scope is broadened to a more regional model where the County provides contracted services to other cities or where the office absorbs all civil rights enforcement, including complaints brought against King County by County employees, then the Office could be potentially housed in DES, DLS, or OERSJ.

If the OLS is placed in DES or DLS, the County would need to determine whether it would be a new division or a section within either the DLS Director's Office or DES Administration, with a new division being more applicable to an OLS with greater regulation coverage, enforcement activities, and budget.

The question of how to address civil rights enforcement is complex, given that the current Civil Rights Program within OERSJ investigates and enforces rules applicable to businesses in the UKC, which would be aligned with the mission of an OLS. OERSJ also investigates other civil rights cases such as complaints against King County as an employer irrespective of whether those operations are within the UKC or not. Options regarding the Civil Rights Codes include OLS enforcement of:

- Labor and civil rights regulations, including complaints against KC operations in the unincorporated area and from KC employees against the County or County labor unions.
- Labor and civil rights regulations except KC employee civil rights complaints, which could remain where currently situated in OERSJ.
- Labor regulations, except all civil rights regulations, remain as currently situated in OERSJ.

If the OLS is established, further input and analysis is needed from the relevant departments to determine operational feasibility, impacts, and workflows.

### **D. Estimates of the County's Costs to Create and Operate an Office of Labor Standards**

Estimated costs for a King County OLS depend on the mission, regulations covered, and office activities as well as the demand for services/number of complaints. Given these unknowns, this report provides low range and high range cost estimates for (1) one-time costs to create the office and (2) ongoing

operational costs (see Table 5).<sup>26</sup> Initiating this work as pilot program or as a limited scale operation could help define demand while not over allocating resources. It is anticipated that the bulk of the funding for the OLS would come from the General Fund as it is unlikely that fees or fines on violators would be sufficient to fund all operations. One-time costs include the following:

- Staff Time - \$225K (1 TLT) - \$450K (2 FTE)<sup>27</sup>
- Legal - \$100K
- Central Rates, Technology and Miscellaneous (Office Setup, Supplies, Etc.) - \$200K - 300K
- Total - \$525K - 850K

Table 5 - Low and High Range Operational Cost Estimates for King County Office of Labor Standards

	<b>Low Range Estimate</b>	<b>High Range Estimate</b>
Covered Regulations	KC labor, wage, and workforce regulations, except civil rights.	Covers all KC labor, wage, and workforce regulations, including civil rights complaints against UA businesses.
Office Activities	Receive complaints, provide minimal assistance helping people file complaints with another agency, investigate limited number of complaints.	Build awareness, receive and investigate complaints, conduct follow-ups, issue and collect fines or perform other enforcement actions, provide technical assistance, conduct periodic audits and follow-ups, bring cases to court when needed, investigate and resolve civil rights complaints against UKC businesses, respond to questions, and provide outreach and education.
FTEs	2-4: Office Lead/Policy Analyst Engagement Specialist Investigator(s)	15-20: Office Director Policy Analyst Some combination of: Engagement Specialist, Business Liaison, Community & Employee Liaison Investigation and Enforcement Manager Investigators: Labor Regulations (3-4); Civil Rights (2-3) Enforcement Specialists (2-) Administrator(s), supporting finance & human resources Data Analyst Paralegal
Wages/Benefits	\$450K - 900K/yr	\$3.4M – 4.5M/yr
PAO Costs	\$100K/yr	\$30K/yr
Business Outreach	\$50K/yr	\$250K/yr
Community Outreach	\$100K/yr	\$500K/yr

<sup>26</sup> One-time and ongoing costs are informed by previous costing work for enforcing the Minimum Wage Ordinance; information on the City of Seattle OLS; and the budget, FTEs, and functions of Seattle’s OLS.

<sup>27</sup> The low range cost represents PSB estimated expenditures to establish a limited/pilot program within an existing division/section, whereas the high range cost represents PSB estimates to establish a new division/office. The one-time and ongoing costs use a PSB estimate of \$225,000 per person in wages and benefits.

Misc Costs <sup>28</sup>	\$150K - 300K/yr	\$1M - \$1.5M/yr
<b>Estimated Cost</b>	<b>\$850K - 1.45M/yr</b>	<b>\$5.5M - 7M/yr</b>

## VI. Conclusion

The 2025 budget included a proviso to examine the feasibility of establishing an Office of Labor Standards for the UKC. Such offices seeking to promote compliance with labor standards have been established in a variety of jurisdictions, including the City of Seattle.

Establishing an OLS within King County government would require the County to address a variety of operational, policy, and legal considerations, as summarized below.

- Policy:
  - Mission
  - Covered regulations
  - OLS activities/actions
- Operational:
  - Budget and number/type of FTEs
  - Office location
  - Implementation plan
  - Enforcement mechanisms and roles
- Legal:
  - Required code changes and PAO support needs
  - Work of the Human and Civil Rights Commission regarding the Civil Rights Program

The estimated cost of a King County OLS varies based on policy and operational considerations, but it is estimated that establishment of an OLS for the County would involve one-time costs of \$525,000 to \$850,000 and ongoing costs of between \$1 million and \$7 million annually. Based on the analysis performed for this report, it is recommended that the office, if created, be located within DLS, DES, or OERSJ.

This report draws on input from a variety of staff throughout King County, who provided timely and extensive information and support.

## VII. Appendices

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<sup>28</sup> This estimate includes costs such as central rates (space, car usage, ongoing IT, etc.), supplies, and some external investigator time in the event of conflicts of interest. PSB estimates central rates at \$50,000 per person per year.

**Appendix A – Examples of Key Features of Offices of Labor Standards or Similar Offices in Other Jurisdictions**

<b>Jurisdiction</b>	<b>Mission</b>	<b>Covered Regulations</b>	<b>Office Activities</b>	<b>Cost/FTEs</b>
City of Seattle Office of Labor Standards <sup>29</sup>	Advance labor standards through thoughtful community and business engagement, strategic enforcement and innovative policy development, with a commitment to race and social justice.	App-based workers, cannabis employee job retention, commuter benefits, domestic workers, fair chance, grocery employee hazard pay, hotel employee protections, independent contractor protections, minimum wage, paid sick and safe time, secure scheduling, transportation network companies, wage theft.	Enforce labor laws, provides education/outreach, supports small/BIPOC businesses, and funds worker-focused advisory groups.	2024: \$9M, 43 FTEs
San Diego County Office of Labor Standards & Enforcement <sup>30</sup>	Advance labor standards through community and business engagement, strategic enforcement, innovation, research, and policy development.	Subcontractor transparency, working families, good faith restaurant owners' program, wage theft, fair chance.	Investigate complaints, educate workers and employers, work with community partners, use data to shape policy, enforce state and local laws.	2021: \$1M, 5 FTEs Current: 15 FTEs
County of San Mateo Office of Labor Standards & Enforcement <sup>31</sup>	Promote fair workplace practices, support compliance with labor laws, and strengthen community partnerships.	Minimum wage, overtime, meal and rest breaks, sick pay, unlawful deductions, tips, on-time payments, correct classifications, no discrimination, health and safety, organizing with coworkers, no retaliation.	Support development of policies, provide outreach and education to workers and employers, and enforce labor standards through investigations and efforts to secure compliance.	No details found
Los Angeles Office of Wage Standards <sup>32</sup>	Administer and enforce Los Angeles City's minimum wage and labor standards.	Minimum wage, paid sick leave, fair hiring practices, stable and predictable work week for retail employees, and protections for hotel and freelance workers.	Investigate complaints, issue notices, hear appeals, issue and enforce remedies, conduct outreach and education, promulgate and enforce regulations.	(no info found)

<sup>29</sup> <https://www.seattle.gov/laborstandards>; [https://www.seattle.gov/documents/departments/financeDepartment/25Adopted\\_26Endorsed/OLS.pdf](https://www.seattle.gov/documents/departments/financeDepartment/25Adopted_26Endorsed/OLS.pdf).

<sup>30</sup> <https://www.sandiegocounty.gov/content/sdc/OLSE.html>;  
[https://sdcounty.granicus.com/DocumentViewer.php?file=sdcounty\\_3cbb7f4124af036d456a409280f0f65e.pdf&view=1](https://sdcounty.granicus.com/DocumentViewer.php?file=sdcounty_3cbb7f4124af036d456a409280f0f65e.pdf&view=1).

<sup>31</sup> <https://www.smcgov.org/ceo/office-labor-standards-and-enforcement>.

<sup>32</sup> [Office of Wage Standards | Wages LA](#).

**Appendix A – Examples of Key Features of Offices of Labor Standards or Similar Offices in Other Jurisdictions (Cont.)**

<b>Jurisdiction</b>	<b>Mission</b>	<b>Covered Regulations</b>	<b>Office Activities</b>	<b>Cost/FTEs</b>
Montgomery County (MD) Office of Human Rights <sup>33</sup>	Receive, investigate and resolve formal complaints of discrimination. [Note: includes housing, real estate, and public accommodations in addition to employment].	Discrimination in employment, displaced worker protection, minimum wage, fair criminal record screening, earned sick and safe leave, minimum work week for building maintenance workers.	Investigate and file complaints, hold conciliation conferences and issue conciliation agreements, hold hearings and issue orders, hear appeals issue penalties and other remedies, request enforcement by County Attorney, conduct outreach and education, issue regulations, and issue quarterly and annual reports.	2025: \$2.2M, 11.6 FTEs
Cook County (IL) Commission on Human Rights <sup>34</sup>	Protect people from discrimination/harassment in employment, housing, public accommodations, credit transactions, and access to county facilities and services; ensure employees are paid an appropriate wage and receive appropriate benefits.	Human rights (unlawful discrimination or harassment), minimum wage, paid leave, living wage.	Investigate and file complaints, conduct settlement and mediation actions, engage in administrative hearings, issue decisions, hear appeals, and conduct outreach and training.	2025: \$1.8M, 15 FTEs
City of Chicago Office of Labor Standards <sup>35</sup>	Oversee landmark labor laws through engagement and enforcement.	Minimum wage, paid leave and sick leave, fair workweek, wage theft, domestic worker contracts, tipped wage credit, anti-retaliation.	Process complaints, conduct investigations, mediate disputes, direct settlement proceedings, issue violations and if necessary, seek licensure discipline against employers. Inform policy development and collaborate on new legislation. Provide public outreach and education.	2025: \$1.4M in salaries, 15 FTEs

<sup>33</sup> Sec. 27-4. Office of Human Rights.; <https://www.montgomerycountymd.gov/OMB/Resources/Files/omb/pdfs/FY25/psprec/36-HumanRights-FY2025-REC-Publication-Report.pdf>.

<sup>34</sup> Commission on Human Rights; [Volume 2 Adopted 2025 Web.pdf](#).

<sup>35</sup> City of Chicago :: Office of Labor Standards; [2025 OLS Annual Report FINAL 20250630](#); [Budget - 2025 Budget Recommendations - Positions and Salaries | City of Chicago | Data Portal](#).

