



August 28, 2019

Patrick Pizzella
Acting Secretary
U.S. Department of Labor
200 Constitution Ave.
Washington, D.C. 20210

Craig Leen
Director
Office of Federal Contract Compliance Programs
U.S. Department of Labor
200 Constitution Ave.
Washington, D.C. 20210

RE: Implementing Legal Requirements Regarding the Equal Opportunity Clause's Religious Exemption (RIN 1250-AA09)

Dear Acting Secretary Pizzella and Director Leen:

The Leadership Conference on Civil and Human Rights and the undersigned 92 organizations request that the Department of Labor extend the comment period for the Notice of Proposed Rulemaking under the RIN number 1250-AA09 and titled *Implementing Legal Requirements Regarding the Equal Opportunity Clause's Religious Exemption*. We request the comment period be extended for a minimum of 60 additional days beyond the current deadline of September 16, 2019. The proposed 30-day comment window is insufficient to receive meaningful public participation in the rulemaking process.

The proposed changes are far-reaching and impact approximately one-fifth of the U.S. labor force.¹ If finalized in their current form, we believe they will significantly and negatively impact the rights of employees, applicants, and others who work for federal contractors all across the country. The proposed rule and its Regulatory Impact Analysis could have numerous legal implications and costs and benefits for employees, applicants, current and prospective contractors, federal agencies, state and local agencies charged with enforcing their own civil rights laws, taxpayers, and the economy as a whole. Our organizations and many others need sufficient time to fully understand this proposal, including its costs and benefits, relevant legal authorities, social science research, and economic data in order to compose well-informed comments.

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AAJJC

**Policy and Enforcement
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Michael Lieberman
Anti-Defamation League
President & CEO
Vanita Gupta

¹ <https://www.dol.gov/ofccp/about/50thAnniversaryHistory.html>

As a result, it is imperative that the public be given sufficient time to evaluate the potential impacts and costs of this proposal, including its potential to contribute to discrimination and restrict opportunities for workers to provide for themselves and their families. We believe providing a longer comment period is consistent with OFCCP's stated mission to "protect workers, promote diversity and enforce the law."²

Advocates, contractors, employees, and all stakeholders deserve a meaningful opportunity to be heard on this important rulemaking. We ask that the Department affirm its commitment to a wide-reaching notice-and-comment period by extending the deadline by a minimum of 60 days. Doing so will ensure that the communities we serve who will be affected by these proposed changes are given the opportunity to engage and give the Department the benefit of a robust rule-making process.

For questions, please contact Gaylynn Burroughs, Senior Policy Counsel at The Leadership Conference on Civil and Human Rights, at (202) 466-3311 or burroughs@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
American Association for Access, Equity and Diversity
American Association of University Women
American Atheists
American Civil Liberties Union
American Constitution Society
American Federation of State, County & Municipal Employees
American Federation of Teachers
American Humanist Association
Americans United for Separation of Church & State
Arab American Institute
Asian Pacific American Labor Alliance, AFL-CIO
Association of Asian Pacific Community Health Organizations
Association of People Supporting Employment First
Campaign for Accountability
Center for American Progress
Center for Law & Social Policy (CLASP)
Center for Reproductive Rights

² <https://www.dol.gov/ofccp/aboutof.html>

CenterLink: The Community of LGBT Centers
Clearinghouse on Women's Issues
Coalition for Humane Immigrant Rights (CHIRLA)
Communications Workers of America (CWA)
Council for Global Equality
Demos
Disability Rights Education & Defense Fund
Economic Policy Institute
Equal Rights Advocates
Equality California
Equality North Carolina
Family Equality
Feminist Majority Foundation
Fenway Health
Free Government Information
Freedom for All Americans
Futures Without Violence
GLSEN
Government Information Watch
Hispanic Federation
Human Rights Campaign
Impact Fund
interACT: Advocates for Intersex Youth
Interfaith Alliance
Jobs with Justice
Justice in Aging
Lambda Legal
League of Women Voters of the United States
Los Angeles LGBT Center
MALDEF
Matthew Shepard Foundation
Movement Advancement Project

NAACP

National Association of Human Rights Workers

National Association of Social Workers

National Center for Lesbian Rights

National Center for Transgender Equality

National Coalition for Asian Pacific American Community Development (National CAPACD)

National Council of Jewish Women

National Disability Rights Network

National Education Association

National Employment Law Project

National Employment Lawyers Association

National Equality Action Team (NEAT)

National Latina Institute for Reproductive Health

National LGBTQ Task Force

National Organization for Women

National Partnership for Women & Families

National Women's Health Network

National Women's Law Center

NETWORK Lobby

OCA - Asian Pacific American Advocates

Open the Government

Oxfam America

People For the American Way

PFLAG National

Protect All Children's Environment

Public Citizen

Santa Clara County Wage Theft Coalition

Secular Policy Institute

Sexuality Information and Education Council of the United States (SIECUS)

Silver State Equality-Nevada

South Asian Americans Leading Together (SAALT)

South Asian Network

TASH

The Arc of the United States

The Trevor Project

Transgender Legal Defense & Education Fund

Union for Reform Judaism

United Church of Christ, Justice and Witness Ministries

United Mine Workers of America

United Steelworkers (USW)

Woodhull Freedom Foundation

Workplace Fairness

YWCA USA