



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.<sup>1</sup> 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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Fatima Goss Graves  
National Women's Law Center  
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Educational Fund, Inc.  
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Japanese American Citizens League  
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NAACP  
Virginia Kase  
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United States  
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People for the American Way  
Samer E. Khalaf  
American-Arab  
Anti-Discrimination Committee  
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National Urban League  
Janet Murguía  
UnidosUS  
Debra L. Ness  
National Partnership for  
Women & Families  
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Of Reform Judaism  
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People with Disabilities  
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AFL-CIO  
Toni Van Pelt  
National Organization for Women  
Randi Weingarten  
American Federation of Teachers  
John C. Yang  
Asian Americans Advancing Justice |  
AAJC

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

<sup>1</sup> <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."<sup>2</sup>

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

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<sup>2</sup> <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