September 16, 2019

Harvey D. Fort, Acting Director
Division of Policy and Program Development
Office of Federal Contract Compliance Programs
200 Constitution Avenue NW
Washington, DC 20210

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

Dear Director Harvey D. Fort,

As 110 religious leaders and 17 faith-based organizations across traditions, we are writing to oppose the Implementing Legal Requirements Regarding the Equal Opportunity Clause’s Religious Exemption (RIN 1250-AA09) proposed rule.

We are called by our sacred texts and faith principles to love our neighbor, accompany the vulnerable, and welcome the sojourner. This rule would allow government contractors to discriminate against workers under the guise of religious liberty. We are taught that there is no compulsion in religion (Quran 2:256) and that no form of discrimination is defensible on religious grounds.

The proposed rule expands the number of organizations and businesses that are traditionally considered to be “religious” and could present religious belief as a defense to a claim of employment discrimination. Any activity to which the contractor ascribes religious meaning will be considered exercise of religion.

Religion should never be used as a weapon to exclude and discriminate. A person’s religious beliefs are a personal choice that should not be forced upon others. This proposed rule wrongfully allows government contractors to take tenets of someone’s faith into account when making employment and benefit decisions, and application of these tenets does not have to be uniform. For example, a government contractor could fire or refuse to interview anyone, however qualified, who does not regularly attend religious services or practices a different religion.

Freedom of religion is a right that we deeply cherish. It allows us to practice our faith freely and without interference from the federal government. But our rights are in fact threatened by this proposed rule. One in five Americans works for a federal contractor. If contractors decide to claim a religious affiliation, up to 1 in 5 Americans could be fired because of their differing religious beliefs, or any number of reasons. This proposed rule would serve only to wreak havoc on our moral and legal obligations to oppose discrimination.

We are also disturbed that there are only 30 days for the public to review and comment on this proposed rule. At a minimum, we ask that DOL extends the comment period so our community members have the opportunity to share just how the implications of the proposal could impact their lives.

When claims of religious freedom become public efforts to exclude and discriminate, we are called to speak up for righteousness and act in solidarity with the oppressed. Therefore, we urge you to withdraw this rule immediately.

Sincerely,

Faith Organizations
Bridges Faith Initiative
Church World Service
Disciples Center for Public Witness
Disciples Justice Network  
Dominican Sisters of Houston  
Holy Spirit Missionary Sisters, USA-JPIC  
HOPE For All: Helping Others Prosper Economically  
Interfaith Worker Justice  
Micah Institute (Interfaith Table)  
Moore’s Sanctuary AME Zion Church  
National Council of Churches  
National Council of Jewish Women  
North American Climate, Conservation and Environment (NACCE)  
NETWORK Lobby for Catholic Social Justice  
Pax Christi USA  
The Church of the Village (NYC)  
Union for Reform Judaism

**Faith Leaders**

**Arizona**
Elder Ellen Vellenga, Presbyterian Church USA  
Fr Bill Remmel, Society of the Divine Savior  
Rev. Karen MacDonald  
Imam Ahmad Shqeirat, Islamic Community Center of Tempe  
Reverend Kenneth Kennon, The Christian Church (Disciples of Christ)  
Pastor Don Benton, UMC  
Rev. Christiane Heyde, Unitarian Universalist  
Rev. Seth Wispelwey, United Church of Christ

**California**
Rev. R. Richard Roe, United Church of Christ  
Rev. Dr. Hugh Wire, Pilgrim Place  
Rev. Dr. Myrna Tuttle, United Church of Christ  
Ms Marian Cruz  
Dr. Louise Fortmann, University Lutheran Chapel  
Rev. Allan B. Jones, United Methodist Church (Retired)  
Rabbi Jonathan Klein, HOPE For All: Helping others Prosper Economically  
Rabbi Suzanne Singer, Temple Beth El  
Deacon Thomas Rossi, MCC/UCC in the Valley  
Rev. Dr. Eileen Altman, First Congregational Church  
Rev. Paul Feiertag, Retired, Evangelical Lutheran Church in America

**Colorado**
Rev. Wayne A. Lawd, Mountain View United Church  
Rev. Dr. Tracy Highes, Mountain View United Church  
Rev. Mark Meeks, Capitol Heights Presbyterian Church  
Rev. Amy Petré Hill, Mountain View United Church  
Sr. Diana White, Sisters of St. Francis

**Florida**
Rev Nancy Rohde, Ft. Myers Congregational United Church of Christ  
The Rev. Barry McCullough, United Church of Christ

**Illinois**
The Rev Charles H Hensel, Episcopal Church  
The Rev. Martin Deppe, United Methodist Church
Sister Dawn M. Nothwehr, OSF, Ph.D., Roman Catholic  
Rev. Jeffrey Phillips, United Church of Christ  
Fr. Robert Oldershaw, St Nicholas Roman Catholic  
Rev. Gayle Tucker, Congregational Church of Jefferson Park UCC  
Sister Mary Shaw, ASC

Indiana  
Rev. Dr. Donald J Treadwell, The Center for Spiritual Growth

Iowa  
Sister Maura McCarthy, Sisters of the Presentation

Kentucky  
Rev. Mary Bettis Love, Crescent Hill Presbyterian Church/Mid-Kentucky Presbytery

Maryland  
Sister Patricia Chappell, Sisters of Notre Dame de Namur  
The Reverend Dr. Laird Thomason, North Chevy Chase Christian Church (Disciples of Christ)

Massachusetts  
Rev. Nelson Murphy, Dennis Union Church  
Rev. Tom Ryan, Paulist North American office for Ecumenical and Interfaith Relations

Michigan  
The Rev. Dr. Marcia Ledford, Esq., Political Theology Matters, LLC  
Sr. Mary Ellen McDonald OP, Grand Rapids Dominicans.org  
Dr. Reginald Smith, Office of Social Justice, Christian Reformed Church in North America  
Rev. Allan Martling, United Church of Christ

Missouri  
Sister Sharon Schmitz, Sisters of Mercy  
Rev. King Schoenfeld, Lutheran Church

New Jersey  
Rev. Dr. John Redic, II, Mentoring Ministries  
Rev. Russell Eidmann-Hicks, New Jersey Association UCC

New Mexico  
Sister Joan Brown, osf Joan Brown, Franciscan sister

New York  
Rabbi Michael Feinberg, Greater New York Labor Religion Coalition  
The Reverend William C. Webb, Episcopal Diocese of Western New York  
Sister Kathleen Simpson, Daughters of Charity  
The Reverend Peter Sulyok, Bridgehampton Presbyterian Church  
Sister Norma Carney, Sisters of the Presentation  
Mr Jerry Rivers, R-F Church of Christ/ North American Climate, Conservation and Environment (NACCE)  
Rev. Jeff Wells, The Church of the Village (NYC)  
Sister Judith Garson, Society of the Sacred Heart  
Rev. Dr. Raymond Rivera, Latino Pastoral Action Center/Sanctuary Church  
Rev. Mark Lukens, Bethany Congregational UCC  
Dr. Diane Steinman, NYS Interfaith Network for Immigration Reform  
Reverend John Long, First Presbyterian Church, Buffalo and Presbytery of WNY  
Rev James Osei-Kofi, Bethesda Healing Center
Imam Souleimane Konate, The Council of African Imam's Inc
The Rev. Daniel Hulseapple (retired), The United Church of Christ

North Carolina
Rev. Mary Anne Ramsey, Retired, Association of Professional Chaplains
Rev. Dr. Doug Wingeier, Garrett-Evangelical Theological Seminary

North Dakota
Rev. Donna Olsen, Hope 4 All Interfaith Community

Ohio
Elder Janice Hunter, Oak Hills Presbyterian Church

Oregon
Coordinator Joanne McClary, Journey Koinania Catholic Community
The Rev. John Reutter-Harrah, Prince of Life Lutheran Church
Rev Arthur Ellickson, ELCA Pastor, Retired
The Rev. Cecil Prescod, Ainsworth United Church of Christ
Rev. Sue Seiffert, St. Stephen Lutheran Church, ELCA
Rev. Dr. Lyda M. Pierce Lyda Pierce, United Methodist Church

Pennsylvania
Rev. Mary Lou Eckels, United Church of Christ
Rev. Dr. LaVonne Allhouse, Retired
Rev. James MacDonald, UPCUSA
Sister Dominica Lo Bianco, OSF, Sisters of St. Francis of Philadelphia
Sister Mary Noel Kernan, SC, Sisters of Charity of Seton Hill

South Carolina
Pastor Larry Dipboye, Grace Covenant Church, Retired

South Dakota
The Rev. Mrs. Jean McCusker, Retired

Tennessee
Dr. Michael Smith, Central Baptist Church of Fountain City
Rev. James McGuire, Cumberland Presbyterian Church
Pastor Carolyn Dipboye, Grace Covenant Church, Retired
Rev. Robert Galloway, Metropolitan Community Church of Knoxville

Texas
Rev. Dr. Edward Kern, Trinity Lutheran Church
Rev. Judy Brock, Christian Church (Disciples of Christ)
Sister JT Dwyer, Daughters of Charity

Washington
Rev. Kay Barckley, University Temple UMC
Rev Judi Edwards, United Church of Christ
Ms. Nancy Horman, Woodland Park Presbyterian Church

Washington, DC
Rev. Dr. L. Parrish, Wesley Theological Seminary
Bro. Brian McLauchlin, Divine Word Missionaries
Rev. Dr. Beverly Goines, National City Christian Church
Chaplain Maggie Siddiqi, Center for American Progress

**Wisconsin**
Rev. Jack Kraaz, UCC
Reverend Robert Harman, United Methodist
Sister Lois Aceto, Racine Dominicans
Ms. Susan Elias

**National**
Minister Sotello Long, Disciples Home Missions
Dr. Mary Elizabeth Hunt, Women's Alliance for Theology, Ethics, and Ritual (WATER)
Mr. Jonathan Boyne, Universalist
Rev. Dr. Sharon Stanley-Rea, Disciples Refugee & Immigration Ministries
Brother Michael Gosch, Clerics of St. Viator (Viatorians)
Sister Rose Therese Nolta, Holy Spirit Missionary Sisters - USA-JPIC
Rev. Melina Frame, Apostolic Catholic Church
Sister Quincy Howard, OP, Dominican Sisters of Sinsinawa
Sister Simone Campbell, NETWORK Lobby for Catholic Social Justice
Rev. Teresa Hord Owens, Christian Church (Disciples of Christ) in the US and Canada
Ms. Maha Elgenaidi, Islamic Networks Group (ING)