

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 Rimmel, 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 McClarty, 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 Althouse, 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 Nolte, 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)