



October 9, 2023

Filed Electronically

Mr. Raymond Windmiller
Executive Officer
Executive Secretariat
U.S. Equal Employment Opportunity Commission
131 M Street, NE
Washington, DC 20507

RE: Proposed Rule; Regulations To Implement the Pregnant Workers Fairness Act; Invitation for Written Comments

RIN No: 3046-AB30

Dear Mr. Windmiller,

We are pleased to submit these comments on behalf of Care Net regarding the Equal Employment Opportunity Commission's proposed rule entitled "Regulations To Implement the Pregnant Workers Fairness Act (PWFA)." Care Net is a national organization, with over 1,200 affiliate pregnancy resource centers (PRCs) and 30,000 volunteers, and provides immediate support to women and men considering abortion so they can choose life.

Care Net operates Pregnancy Decision Line (PDL), a helpline for anyone considering abortion. Additionally, we train churches to provide long-term discipleship and support for pregnancy center clients. As such, our organization plays an integral role in helping both women and men who are facing pregnancy decisions and therefore, we strongly oppose any abortion regulations.

The Pregnant Workers Fairness Act was passed in December 2022 with bipartisan support and was designed to prohibit discrimination based upon "pregnancy, childbirth, or related medical conditions." Bill sponsor Senator Bob Casey (D-PA) [stated](#) after the law took effect in June that the "legislation requires employers to provide reasonable accommodations—such as additional bathroom breaks or a stool for workers who stand—so that pregnant women can continue to work safely." In his [floor speech](#), Senator Cassey made clear that the EEOC "could not--issue any regulation that requires abortion leave" nor does the law "require employers to provide abortions in violation of State law."

The EEOC's proposed definition for "related medical conditions" is both extremely broad and vague. Especially concerning is that the EEOC defines a medical condition in part as "having or choosing not to have an abortion." The EEOC's attempt to add abortion regulations into the PWFA disregards both the law and the intent of the bill's author. It also disregards the will of the members of Congress who voted the bill into law. Senator Bill Cassidy, lead sponsor and ranking member of the Senate Health, Education, Labor, and Pensions (HELP) Committee, issued a statement opposing EEOC's proposed regulations. He [said](#), "These regulations completely disregard legislative intent and attempt to rewrite the law by regulation. The Biden administration has to enforce the law as passed by Congress, not how they wish it was passed." If the EEOC moves forward with the proposed regulations, it will greatly impact our ability to help women and men across the country.

The EEOC's proposed regulation poses an undue hardship on pregnancy centers. PRCs that do not comply with the EEOC's abortion regulations will likely be forced to contradict their religious and pro-life beliefs or close their doors. Each of our affiliate pregnancy centers are designed to offer life-saving services. These centers provide ultrasounds, parenting classes, client resources, and material goods at no cost. Most importantly, clients experience compassion, hope, and help through the ministry of Jesus Christ. While Care Net's affiliate PRCs do offer abortion education information, they must agree not to perform or refer for abortions. They also recognize that every human life begins at conception and is worthy of protection. It is deeply troubling that the proposed regulations do not make provisions for religious organizations who cannot in good conscience comply with orders that violate their religious beliefs. The administration's efforts to provide accommodations for employees to receive an abortion will seriously harm the hundreds of thousands of clients who receive services from our centers.

Beyond the serious religious and pro-life concerns these regulations pose to pregnancy centers, they also present potential financial hardships. Many of our affiliate pregnancy centers have a small number of staff and are assisted by capable volunteers who generously give of their time and talents. These centers often operate on small budgets and are funded through financial gifts from thoughtful donors. Some of our centers have less than 15 staff, which means they would be exempt from the regulation according to the EEOC. However, these centers have the potential to grow and therefore, they would still be impacted. An even greater concern is that the government will force PRCs to violate their deeply held religious beliefs, therefore leading to potential litigation. Most PRCs do not have the time or the money to defend themselves against a lawsuit brought by an employee seeking to obtain an abortion or to fight the administration's heavy-handed tactics.

As an organization committed to God's Word, we believe that each individual is uniquely created in the image of God. Therefore, our centers strive to show Christ's love to all clients by meeting their physical and spiritual needs. In order to continue our mission to present clients with realistic alternatives and Christ-centered support through our life-affirming network of pregnancy centers, churches, organizations, and individuals, it is imperative that PRCs remain free to offer services and help to their communities without government interference.

Thank you for the opportunity to comment on this essential matter. In summary, we ask that the Equal Employment Opportunity Commission uphold the religious beliefs of pregnancy centers and the conscience rights of their employees.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Roland C. Warren', with a long horizontal flourish extending to the right.

Roland C. Warren
President & CEO