UNITED CHURCH OF CHRIST

January 13, 2025

Acting Secretary Julie Su
U.S. Department of Labor
200 Constitution Ave NW
Washington, DC 20210

Administrator Jessica Looman
Wage and Hour Division
U.S. Department of Labor
200 Constitution Ave NW
Washington, DC 20210

Dear Acting Secretary Su and Administrator Looman:

The Interfaith Disability Advocacy Coalition and undersigned faith-based organizations would like to express our sincere gratitude to the Department of Labor Wage & Hour Division for drafting the proposed rule, "Employment of Workers with Disabilities Under Section 14(c) of the Fair Labor Standards Act" (RIN: 1235-AA14). We respectfully request that you finalize this proposed rule before the presidential transition. Once this rule is finalized, we hope guidance will be provided to help current 14(c) employees attain competitive, integrated employment.

As institutions invested in faith communities, we have always been governed by the mandates of love and justice. It is under this higher authority that many congregations and other religious entities are creating accessible and welcoming environments for people with disabilities. When barriers of architecture, communication, employment, and attitude are removed, justice and love prevail and people with disabilities become full participants in the celebrations and obligations of their faith.

That is why we hope you will focus all your efforts on the prompt finalization of this proposed rule, and, once finalized, you will include employment guidance and assistance for current 14(c) employees. Without assistance, it could prove difficult for 14(c) workers to secure new employment, which could lead to decreased quality of life and worsened mental health outcomes.

We understand that there will still be many barriers to this rule's full implementation given the presidential transition. We hope your agency will work efficiently to protect this regulation from any future threat. If you have any additional questions or concerns, please contact Abigail Cipparone (cipparonea@ucc.org).

Sincerely,

Interfaith Disability Advocacy Coalition

United Church of Christ

Disability Belongs

NETWORK Lobby for Catholic Social Justice

Alliance of Baptists

Pax Christi USA

ICNA Council for Social Justice

Missionary Oblates of Mary Immaculate