The Colorado Health Foundation™

Public Comment on Proposed Rule RIN 3046-AB37, Removal of Reporting Requirements, Rescission of EEO-1, EEO2, EEO-3, EEO-4. EEO-5, and Reporting Requirements Under Title VII, the ADA, GINA, and the PWFA

The Colorado Health Foundation ("CHF" or "the Foundation") is a statewide, nonprofit and nonpartisan philanthropic organization with a mission to improve the health and well-being of Coloradans. Through community engagement, research, grantmaking, and private sector investments, the Foundation works to ensure that everyone in
Colorado has what they need to be healthy.

The Foundation writes to express our concern about the proposed rescission of the EEOC's longstanding workforce demographic reporting framework. We recognize the Commission's interest in evaluating existing reporting requirements and reducing unnecessary administrative burden where appropriate. However, we are concerned that eliminating these reporting requirements would significantly reduce the transparency and availability of workforce demographic data that has long informed employers, policymakers, researchers, and the public. We respectfully urge the Commission to withdraw the proposed rule and retain the existing workforce demographic reporting framework while engaging with employers, workers, researchers, states, and other stakeholders to identify opportunities to modernize and improve the reporting requirements.

As outlined below, the Foundation is concerned that:

- The proposed rule would substantially reduce the transparency and availability of workforce demographic data that supports evidence-based policymaking, research, and accountability.
- Eliminating the national reporting framework would make it more difficult to identify systemic workforce trends and inform equal employment opportunity efforts, even as the EEOC retains authority to investigate individual complaints.
- Rescinding the federal reporting framework may increase, not reduce, administrative complexity by contributing to a patchwork of differing state reporting requirements, including Colorado's recently enacted HB 26-1207.
- The Commission should consider targeted modernization of the reporting framework as an alternative to complete rescission.

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TYPE

Announcements

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BY

The Colorado Health Foundation