



September 2, 2025

The Honorable Lori Chavez-DeRemer  
Secretary  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Mr. Daniel Navarrete  
Director  
Division of Regulations, Legislation, and  
Interpretation  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Ms. Catherine L. Eschbach  
Director  
Office of Federal Contract Compliance  
Programs  
200 Constitution Avenue NW  
Washington, DC 20210

Mr. Luke Murren  
Acting Administrator  
Office of Policy Development and Research  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Re: RIN 1250-AA17 – Rescission of Executive Order 11246 Implementing Regulations [Docket No. OFCCP-2025-0001]; RIN 1205-AC21 – Prohibiting Illegal Discrimination in Registered Apprenticeship Programs [Docket No. ETA-2025-0006]; RIN 1235-AA51 – Application of the Fair Labor Standards Act to Domestic Service

Dear Secretary Chavez-DeRemer, Ms. Eschbach, Mr. Navarrete, and Mr. Murren:

As members of the Democratic Women's Caucus, we write with deep concern about the Department of Labor's (DOL) proposed rules that will rip away financial and job opportunities for women, RIN 1250-AA17, RIN 1205-AC21, and RIN 1235-AA51. **These three proposed rules are clear attacks on women's economic security.** The proposed rules would rescind anti-discrimination policies and programs that reduce barriers for underserved communities, roll back fair compensation for care workers, and eliminate apprenticeship programs designed to ensure women have equal access to apprenticeship opportunities. Not only do women deserve access to economic advancement, women are central to the strength of the American economy.<sup>1</sup> Rather than stifle women's progress in the workforce, we need to increase their wages, meet the needs of their caregiving responsibilities, and eliminate barriers to training programs for good paying jobs. Investments in women's economic success are an investment in the success of the American economy. Therefore, we urge the DOL to withdraw RIN 1250-AA17, RIN 1205-AC21, and RIN 1235-AA51 as these rules would undermine women's economic mobility and prosperity.

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<sup>1</sup> Khattar, R., & Estep, S. (2024, March 14). *Playbook for the advancement of women in the economy* [Report]. Center for American Progress. Retrieved from <https://www.americanprogress.org/article/playbook-for-the-advancement-of-women-in-the-economy/>

RIN 1250-AA17 would repeal Executive Order (EO) 11246 regulations, which were implemented to protect workers employed by federal contractors from discrimination based on race, color, religion, sex, sexual orientation, gender identity, and national origin.<sup>2</sup> The EO and the regulations require employers to take steps to break down barriers to opportunity and protect employees' right to discuss wages without facing retaliation. Repealing these regulations will not only take women backwards, it will take away their rights and tools for economic security. Requiring employers to take proactive steps to maintain fair hiring and workplace practices ensures women are not arbitrarily excluded from fields like the trades. Protecting workers' right to discuss and disclose their pay without retaliation allows workers to identify and challenge discriminatory pay.<sup>3</sup> Pay transparency also helps close the gender wage gap.<sup>4</sup> We should be working towards a future where women are not discriminated against in the workforce and earn equal pay; this proposed rule does neither of those things. The DOL's proposal to rescind EO 11246 regulations would undermine discrimination protections and make it harder for women and other workers to access good jobs with federal contractors.

RIN 1205-AC21 would eliminate obligations intended to help ensure that women have equal access to apprenticeship programs. Women have been historically underrepresented in apprenticeships. Despite women making up about half the workforce, the Department of Labor reported that women are still disproportionately absent from registered apprenticeships.<sup>5</sup> DOL investments have delivered measurable progress. After the DOL implemented intentional investments to increase the number of women in apprenticeships, women's participation grew threefold between 2014 and 2023.<sup>6</sup> In addition to DOL's proposed rulemaking that would gut anti-discrimination protections in apprenticeship programs, the Department already terminated more than 20 Women in Apprenticeship and Nontraditional Occupations (WANTO) and Fostering Access, Rights, and Equity (FARE) grants to increase women's representation in the trades and to address workplace harassment.<sup>7</sup> The Department's goal is clear – eliminate all programs that even the playing field for women in the male-dominated trades workforce. RIN 1205-AC21 would undo years of progress for women in the trades.

RIN 1235-AA51 would roll back minimum wage and overtime protections for almost 4 million home care workers across the country.<sup>8</sup> For too long, the critical profession of care work has been dismissed and undervalued since it is often seen as 'women's work.' Women account for 87% of care workers, and of the 3 million care workers in the United States, 65% are low-wage earners.<sup>9</sup> Low wages and poor working

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2 Johnson, A. (2022, December 9). *Written testimony in support of D.C. pay secrecy bill (B24-0708)* [Testimony]. National Women's Law Center. Retrieved from <https://nwlc.org/resource/testimony-in-support-of-dc-pay-secrecy-bill/>

3 U.S. Department of Labor, Office of Apprenticeship. (2022, August). *Women in apprenticeship* [Fact sheet]. U.S. Department of Labor. Retrieved from <https://www.apprenticeship.gov/sites/default/files/dol-industry-factsheet-series-women.pdf>

4 Hegewisch, A. (2024, March). *As apprenticeships expand, breaking down occupational segregation is key to women's economic success: Gender, race, and the wage gap in apprenticeship* [Report]. Institute for Women's Policy Research. Retrieved from <https://iwpr.org/wp-content/uploads/2024/03/IWPR-Apprenticeship-Report-March-2024.pdf>

5 Mother Jones. (2025, May). *DOGE women's grant for construction and manufacturing canceled*. Retrieved from <https://www.motherjones.com/politics/2025/05/doge-womens-grant-construction-manufacturing-cancelled/>

6 U.S. Bureau of Labor Statistics, U.S. Department of Labor. (2025, April 18). *Home health and personal care aides*. In *Occupational Outlook Handbook*. Retrieved from <https://www.bls.gov/ooh/healthcare/home-health-aides-and-personal-care-aides.htm>

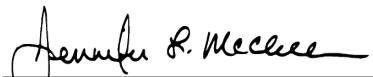
7 National Domestic Workers Alliance. (n.d.). *Transforming care work: Establishing care as the foundation of our economy* [Webpage]. National Domestic Workers Alliance. Retrieved from <https://www.domesticworkers.org/programs-and-campaigns/developing-policy-solutions/transforming-care-work/>

8 Ibid.

conditions result in the high turnover of care workers and contributes to the care workforce shortage.<sup>10</sup> With over 10,000 people turning 65 each day,<sup>11</sup> care workers are more essential than ever; yet, the working conditions and job quality for care workers has not been adequately addressed. Further lowering their wages and job quality by ripping away their federal minimum wage and overtime protections through RIN 1235-AA51 worsens their already exploitative working conditions and threatens the workforce shortage already happening for over 9 million older adults and people with disabilities who rely on home care services.<sup>12</sup>

These three proposed rules take away protections, pay, and economic opportunity for women. Women deserve access to good paying jobs and to be treated with fairness and dignity in every profession. When women thrive, the economy thrives. RIN 1250-AA17, RIN 1205-AC21, and RIN 1235-AA51 not only fail to uplift women in the workforce, they will actively roll back women's rights and progress in the workplace. That is why we urge the DOL to withdraw RIN 1250-AA17, RIN 1205-AC21, and RIN 1235-AA51, and we call on the Department of Labor to partner with us to work on policies that actually strengthen women's economic security.

Sincerely,



Jennifer L. McClellan  
Member  
Democratic Women's Caucus



Lateefah Simon  
Member  
Democratic Women's Caucus



Lucy McBath  
Congressional Black Caucus  
Liaison  
Democratic Women's Caucus



Lauren Underwood  
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Deborah K. Ross  
Co-Chair  
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Democratic Women's Caucus



Pramila Jayapal  
Congressional Asian Pacific  
American Caucus Liaison  
Democratic Women's Caucus

9 Medicare Rights Center. (2024, March 21). *New report explores strengthening the direct care workforce* [Blog post]. Retrieved from <https://www.medicarerights.org/medicare-watch/2024/03/21/new-report-explores-strengthening-the-direct-care-workforce/>

10 Chidambaram, P., Burns, A., Wolk, A., Claxton, G., & Rudowitz, R. (2024, October 30). *Who are the direct care workers providing long-term services and supports (LTSS)?* Kaiser Family Foundation. Retrieved from <https://www.kff.org/medicaid/who-are-the-direct-care-workers-providing-long-term-services-and-supports-ltss/>

11 Executive Order No. 11246—Equal Employment Opportunity (1965, September 24). *Federal Register*, 30 FR 12319. Retrieved from <https://www.federalregister.gov/executive-order/11246>

12 National Women's Law Center. (2019, February). *Combating punitive pay secrecy policies* [Fact sheet]. National Women's Law Center. Retrieved from <https://www.nwlc.org/wp-content/uploads/2019/02/Combating-Punitive-Pay-Secrecy-Policies.pdf>