



The Center for BIBLICAL BUSINESS

The Voice of America's Leading Christian CEOs

Comments of the Christian Employers Alliance

Regarding the Draft Report of the Presidential Religious Liberty Commission

Subject: PUBLIC COMMENT – APPENDIX B / CHAPTER 13 – CHRISTIAN EMPLOYERS ALLIANCE

Chairman Dan Patrick and Members of the Presidential Religious Liberty Commission:

On behalf of the Christian Employers Alliance ("CEA"), thank you for the opportunity to provide comments on the Draft Report of the Presidential Religious Liberty Commission.

CEA is a national association of Christian employers committed to protecting religious liberty in the workplace and helping employers faithfully integrate their sincerely held religious beliefs into the operation of their businesses. We appreciate President Donald J. Trump for establishing this Commission and commend Chairman Dan Patrick, Vice Chairman Dr. Ben Carson, the Commissioners, Advisory Board members, and staff for producing one of the most comprehensive modern examinations of religious liberty in America.

The Commission's report appropriately recognizes that religious liberty is America's First Freedom and that the free exercise of religion strengthens families, charitable organizations, education, healthcare, military readiness, civic engagement, and our constitutional system of government. We strongly support both the report and its overall direction.

The comments below are offered in that same spirit. CEA respectfully hopes they will assist the Commission in strengthening the final report by expanding its discussion of religious liberty in the marketplace and by providing additional recommendations that federal agencies may find helpful during implementation.

General Observation

One of the report's greatest strengths is its recognition that religious liberty extends well beyond houses of worship into nearly every aspect of American life.



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The report thoughtfully examines religious liberty in education, healthcare, the military, faith-based institutions, charitable organizations, and the public square.

CEA respectfully believes the final report could be strengthened by further recognizing the unique role that Christian employers play within American civil society.

Executive Order 14291 specifically identifies employers and employees among the areas for Commission consideration. While the report addresses workplace issues, the recommendations concerning employers and the private sector are comparatively brief when viewed alongside the extensive recommendations addressing schools, healthcare, military service, and faith-based institutions.

For millions of Americans, work is itself an expression of vocation, stewardship, and religious conviction. Christian employers seek to honor their faith not only through personal worship but through the way they conduct business, care for employees, serve customers, and contribute to their communities.

Recognizing this dimension of religious liberty would further strengthen the report.

CEA's Perspective

CEA respectfully offers these recommendations based upon years of working with Christian employers navigating questions of religious liberty, federal regulation, and public policy.

Our experience suggests that many conflicts arise not because employers seek special treatment, but because statutes, regulations, or agency guidance are interpreted in ways that unnecessarily burden sincerely held religious beliefs.

We have also observed that one of the greatest challenges facing employers is not necessarily the absence of constitutional protections, but the practical difficulty of asserting those protections. Lengthy investigations, regulatory uncertainty, and prolonged litigation can discourage employers from exercising rights already protected by the Constitution and the Religious Freedom Restoration Act.

For that reason, CEA strongly supports the Commission's emphasis on proactive executive action, agency guidance, education, and regulatory reform. Clear administrative guidance



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and consistent enforcement can prevent many conflicts before litigation becomes necessary.

Recommendation 1

Expand the Discussion of Religious Liberty in the Marketplace

CEA respectfully recommends expanding Chapter 13 to more fully recognize that businesses may also serve as communities through which Americans faithfully exercise religion.

Faith-driven employers often integrate sincerely held religious beliefs into:

- employee benefits
- charitable giving
- ethical business practices
- workplace culture
- corporate governance
- community service
- stewardship of business resources

The report rightly recognizes churches, schools, charities, and ministries as institutions through which Americans exercise religion. We respectfully suggest that faith-driven businesses likewise deserve express recognition.

Recommendation 2

Expand Appendix B - Private Sector Recommendations

CEA respectfully recommends expanding the Private Sector recommendations in Appendix B to include additional agency-specific recommendations that mirror the level of detail provided elsewhere in the report.



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Department of Justice

Consider establishing a Marketplace Religious Liberty Initiative to coordinate federal policy affecting employers, businesses, ministries, and nonprofit organizations.

Equal Employment Opportunity Commission

Consider issuing comprehensive employer guidance addressing:

- religious accommodations
- workplace religious expression
- compelled speech
- sincerely held religious beliefs
- faith-based hiring where permitted by law
- Religious Freedom Restoration Act considerations

Department of Labor

Consider reviewing regulations and guidance affecting religious employers, including:

- accommodation requirements
- compliance guidance
- contractor obligations
- investigative procedures
- workplace policies

Department of Health and Human Services

Consider clarifying conscience protections applicable to employer-sponsored health plans and reviewing regulations that may unnecessarily burden sincerely held religious beliefs.



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Department of Treasury / Internal Revenue Service

Consider reviewing regulations and administrative guidance affecting churches, ministries, religious nonprofits, faith-based schools, and faith-driven employers to ensure consistent, viewpoint-neutral administration.

Small Business Administration

Consider developing educational resources explaining religious liberty protections available to America's small business community.

Recommendation 3

Marketplace "Know Your Rights"

CEA strongly supports Recommendation Two.

We respectfully suggest that employers also be included among the audiences receiving "Know Your Rights" educational materials.

Such guidance could address:

- Title VII religious protections
- RFRA
- EEOC procedures
- HHS conscience protections
- available federal resources
- complaint procedures

Educational resources of this nature could prevent misunderstandings before they develop into legal disputes.



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Recommendation 4

Encourage Administrative Safe Harbors

CEA respectfully encourages the Commission to consider recommending that federal agencies develop:

- advisory opinion procedures
- voluntary compliance pathways
- religious liberty safe harbors
- mediation opportunities
- pre-enforcement review processes

These tools could reduce unnecessary litigation while providing greater certainty for both regulated entities and federal agencies.

Recommendation 5

Government-wide Religious Liberty Regulatory Review

CEA respectfully recommends consideration of an additional recommendation encouraging every federal agency to conduct a comprehensive review of regulations, guidance documents, enforcement policies, grant conditions, and administrative practices that may unnecessarily burden religious exercise.

Such a review could help ensure consistency with:

- the Religious Freedom Restoration Act;
- Executive Order 14291;
- recent Supreme Court precedent; and
- the Commission's final recommendations.



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Appendix A

Suggested Executive Actions During the First 180 Days

Department of Justice

- Coordinate religious liberty policy across federal agencies.
- Update RFRA guidance for federal agencies.
- Expand outreach regarding religious liberty protections.

Equal Employment Opportunity Commission

- Publish employer guidance.
- Develop "Know Your Rights" resources.
- Review existing guidance for consistency with recent Supreme Court decisions.

Department of Labor

- Review regulations affecting religious employers.
- Clarify accommodation guidance.
- Review contractor policies.

Department of Health and Human Services

- Review conscience protections.
- Clarify employer rights regarding health-plan design.

Department of Treasury / Internal Revenue Service

- Review administrative guidance affecting religious organizations.
- Ensure viewpoint-neutral administration.

Small Business Administration

- Publish educational materials for faith-driven small businesses.

Office of Personnel Management



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- Review federal employee religious accommodation guidance.
- Expand training for agency human resources professionals.

Conclusion

The Christian Employers Alliance applauds the Commission for producing a thoughtful, well-researched, and timely report addressing one of our nation's most fundamental constitutional freedoms.

CEA respectfully believes the report would be further strengthened by expanding its discussion of the unique role employers play in the exercise of religion and by providing additional practical recommendations to assist federal agencies in implementing the Commission's vision.

Faith-driven employers contribute immeasurably to American society by creating jobs, serving communities, supporting charitable work, and providing opportunities for millions of Americans to integrate faith and work. Protecting their ability to operate according to sincerely held religious beliefs strengthens not only religious liberty but also the broader institutions of civil society that sustain our nation.

Thank you for the opportunity to provide these comments and for your dedicated service to protecting and advancing America's First Freedom.

Respectfully submitted,

Margaret Luculano

President

Christian Employers Alliance