

September 2, 2025

Russell Vought  
Director  
Office of Management and Budget  
725 17th Street, N.W.  
Washington, D.C. 20503

Subject: Urgent Concerns About the Cumulative Impact of Regulatory Rollbacks on Working Women

Dear Director Vought,

Millions of women are at risk of losing protections that help make it possible to keep their jobs, support their families, and build a safe and secure future because the Trump Administration's Department of Labor is advancing a wave of harmful rules that undercut their rights at work. On behalf of **the 75 Million Project**, we are writing today to urge reconsideration of the harmful regulatory agenda that this Administration is advancing. As of today, September 2nd, the Department of Labor has concluded a public comment period on dozens of worker regulations. If implemented, they amount to a coordinated and multi-pronged attack on working women, erasing decades of progress. We are concerned that the Office of Information and Regulatory Affairs (OIRA) has no plans to analyze the cumulative impacts these regulations will have on women's workforce participation, their families and communities, and our economy as a whole.

The aggressive pace and overlap of these pending regulations have made it nearly impossible for the public, including employers and everyday workers, to provide the meaningful assessments that reviewing these rules requires. Rather than rushing forward, we urge OIRA to pause and evaluate the collective impact of this suite of proposals. It is not possible to grow the economy or strengthen the American labor force while simultaneously dismantling the very protections that allow working women to participate and succeed in the paid labor force overall, including in critical sectors like home care, the construction trades, hospitality, and as federal contract workers.

Our organizations have long advocated for policies that advance opportunity and fairness for working women, not only to advance the principle of equality but also because women's incomes and workforce participation are an economic necessity, not just for women and their families, but for the economy as a whole. Ensuring that women workers can earn fair wages and participate fully in the economy requires a multi-pronged approach, requiring that we combat 1) undervaluing the work historically performed by women, 2) barriers to women entering higher-paid occupations, and 3) myriad forms of workplace discrimination. Alarming, regulatory

actions by this Administration have steered policies in the exact opposite direction in each of these three areas. These proposed regulatory rollbacks also reflect a recurring pattern: they reinforce the very structures that have historically excluded women, especially Black women, immigrants, and low-paid women, from economic security. The critical work performed by women in our economy remains woefully underpaid and undervalued, as women continue to face barriers to entering and succeeding in high-paying and economically vital occupations where they have been historically underrepresented. Rather than correcting this, several of these pending rules would introduce even more barriers to workforce participation. We can only conclude that not only is this Administration not “pro-worker” as it claims but is actively hostile toward women’s workforce participation.

For example, the Department of Labor plans to revive a loophole impacting workers engaged in domestic service, a sector overwhelmingly staffed by women of color and immigrant women, stripping millions of home care workers of federal minimum wage and overtime protections. These workers are the backbone of the economy, instrumental to the delivery of long-term care that enables older adults and individuals with disabilities to receive assistance in their own homes and remain integrated in the community. The proposal would allow employers to use an exemption reserved for “casual” companions to pay skilled professional home care workers subminimum wage. The proposal would also increase financial precarity and workforce instability in a sector already experiencing workforce shortages that jeopardize access to care, particularly for beneficiaries of Medicaid’s Home and Community Based Services (HCBS). The added instability of the workforce would, in turn, generate additional unexpected caretaking responsibilities for families of these populations. And in many households, it is women who disproportionately carry these responsibilities, often at the cost of their own economic security, career advancement, and personal well-being. Another rule slated to go into effect chips away at women’s earnings by removing an important regulatory protection for tipped workers – and lower-paid, women wait staff will be among those most impacted.

While some rules devalue the work women are doing, others create new obstacles to entering higher-wage, male-dominated industries and occupations. The Department of Labor’s proposed rule addressing Registered Apprenticeship Programs would weaken equal employment opportunity and nondiscrimination requirements in registered apprenticeships, one of the few pathways into high-wage jobs in the trades for women and other historically excluded groups. Women make up just 5% of participants in federally registered construction apprenticeship programs, and only 4% of workers in the trades, yet they are nearly two-thirds of the workers in low-wage jobs in this country. The imbalanced allocation of women and men among different jobs and industries accounts for half of the gender wage gap. Rolling back these protections sends a message that this Administration has no real interest in creating pathways for women into jobs with family-sustaining wages.

Third, there are additional rules that would continue the Trump Administration’s dismantling of critical civil rights protections and enforcement mechanisms that have long served as a backstop against discriminatory practices. For example, regulations that rescind the key provisions of Executive Order 11246 will undermine enforcement of anti-discrimination and pay equity protections for federal contractors, which have provided relief to workers who have faced harassment, retaliation, or unjust pay disparities. Similarly, rolling back affirmative outreach provisions in the Workforce Innovation and Opportunity Act (WIOA) would weaken requirements that ensure equitable access to federally funded workforce training programs.

In addition to devaluing work performed by women, creating obstacles for women to enter higher-paid occupations, and removing critical anti-discrimination protections, we are concerned about the many regulatory proposals to make workplaces less safe. The Occupational Safety and Health Administration (OSHA) has dozens of proposals to roll back worker safety standards. Of particular concern is the proposed change to OSHA’s “general duty clause,” which provides OSHA with an enforcement tool to combat hazards that fall into gaps of current standards. The proposed change will leave workers vulnerable in women-dominated industries such as healthcare and social work. Women in these sectors face higher risks for workplace violence, repetitive musculoskeletal disorders, and infection exposure, and the general duty clause proposal will only heighten those risks.

These changes are just a few examples of this Administration waging a war against fundamental values of equality under the banner of “illegal DEI,” making workplaces less safe for workers, rolling back civil rights enforcement, and eroding working women’s ability to succeed in good-paying jobs. It is both short-sighted and harmful to advance a regulatory agenda that ignores these realities.

**The Office of Information and Regulatory Affairs (OIRA) has an urgent responsibility to take action.** As the agency charged with overseeing the regulatory process across the federal government, OIRA has the unique authority and responsibility to assess the cumulative impact of proposed rules across agencies. That birds-eye perspective is critical in moments like this, where piecemeal analysis fails to capture the full picture of harms impacting working women.

**We strongly urge your office to direct the Department of Labor to pause its current rulemaking until OIRA has evaluated the cumulative impact of all the Department of Labor’s regulatory proposals that would harm working women and limit economic opportunity.** We request that during this pause, OIRA conduct a community impact assessment (through public hearings, listening sessions or roundtables that capture input from impacted communities) and an analysis of workforce impacts based on Bureau of Labor Statistics categories of race/ethnicity, age, and sex. These rules must be collectively assessed not only on their individual merits, but in terms of what they represent together: a systemic rollback of the tools that allow working women to survive and succeed in our economy.

We would welcome the opportunity to meet with you and engage further to ensure that the regulatory process remains accountable to those who are most impacted.

Sincerely,

The undersigned members of The 75 Million Project

*A Better Balance*

*American Civil Liberties Union*

*Center for American Progress*

*Center for Law and Social Policy*

*Equal Rights Advocates*

*Justice for Migrant Women*

*National Asian Pacific American Women's Forum*

*National Coalition on Black Civic Participation: Black Women's Roundtable*

*National Employment Law Project*

*National Partnership for Women & Families*

*National Women's Law Center*

*Women Employed*

**Cc:**

Jeffrey B. Clark Sr.,

Acting Administrator

Office of Information and Regulatory Affairs

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