



Submitted electronically via www.regulations.gov

August 24, 2026

Raymond Windmiller

Executive Officer, Executive Secretariat

U.S. Equal Employment Opportunity Commission

131 M Street NE, Washington, DC 20507

Regarding: RIN 3046-AB37, Removal of Reporting Requirements

The American Public Health Association strongly opposes the U.S. Equal Employment Opportunity Commission's proposed rule ([RIN 3046-AB37](#)) rescinding sex and race reporting requirements. The rule would weaken our nation's ability to track, understand, and prevent employment discrimination and would have widespread consequences on workers who are part of groups that have historically been targeted by disproportionate rates of discrimination.

Discrimination is a public health issue that can affect a person's ability to lead a healthy and happy life. When this discrimination comes in the form of employment discrimination, it can affect an individual's earnings, health care coverage, future career opportunities, educational attainment, and countless other factors.

The ability to track, evaluate, and research employment discrimination is an essential first building block in resolving and preventing its ill effects. That's why rigorous reporting requirements, such as the United States Equal Employment Opportunity Commission's reporting requirements on race and sex, first established in the 1960s, are necessary both for the people who have faced employment discrimination and for preventing future instances of discrimination. The requirements, applying to employers who employ 100 or more workers and requiring annual submission of workforce demographic data, help make the following possible:

1. EEOC reporting requirements provide data to states that allows them to investigate harmful employment practices and enforce employee protections. Without this data, states would have to invest additional resources to conduct these investigations or risk missing discrimination trends. Furthermore, if left to the states, tracking of this information would differ dramatically

state by state, and it would be much more difficult to draw national trends. A national reporting requirement helps make sure all states are working with the same standard of data.

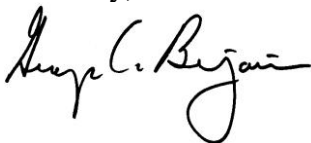
2. EEOC reporting requirements provide data that can help plaintiffs in discrimination lawsuits prove their claims in court. Without data tracking employment practices, hiring and promotion practices, etc., companies with discriminatory practices could go unpunished and the victims left to deal with the consequences.
3. The EEOC publishes aggregate data that's collected as a result of the reporting requirements, allowing researchers, advocates, and the public to analyze trends and patterns in the data. Data collection is an essential pillar of public health for understanding how epidemics change over time, or understanding how public health interventions are successful in improving people's health and wellness.

The proposed rule titled "*Removal of Reporting Requirements*" published by the EEOC in July would dismantle these essential reporting requirements and thus would make tracking and responding to employment discrimination much more difficult. This impact would be wide-ranging, affecting states, researchers, plaintiffs, and other stakeholders. As outlined in [APHA's policy statement on Decent Work for All](#), work should be fair and equitable, with basic work rights including, but not limited to, the opportunity to be free from discrimination and harassment. Dismantling EEOC reporting requirements threatens essential processes that have protected workers from employment discrimination for over sixty years and therefore threaten public health. APHA urges the EEOC to rescind and not implement this proposed rule.

APHA appreciates the opportunity to share our comments on this important proposal. We look forward to working with the EEOC on rules and regulations affecting public health in the future.

Please feel free to contact me with any questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Georges C. Benjamin". The signature is fluid and cursive, with the first name "Georges" being more prominent.

Georges C. Benjamin, MD
Chief Executive Officer