

3339

**From:** SUSAN MOWRER  
**To:** HR, PHRC Regs Public Comment; [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)  
**Subject:** [External] Fwd: PHRC to IRRC #3339  
**Date:** Monday, May 9, 2022 7:18:39 PM

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Forwarding to ensure my opinion is registered on this IRRC #3339

----- Original Message -----

From: SUSAN MOWRER <[sgmowrer@comcast.net](mailto:sgmowrer@comcast.net)>  
To: "rivsamu@pa.gov" <[rivsamu@pa.gov](mailto:rivsamu@pa.gov)>, "liknight@pa.gov" <[liknight@pa.gov](mailto:liknight@pa.gov)>  
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MAY 11 2022

Independent Regulatory  
Review Commission

Regarding the Open Comment Period that closes today:

Dear Mr. Rivera and Ms. Knight:

I am writing today to express my opposition to the proposed PHRC creation of Subchapter D to amend the definitions of sex, religious creed, and race without proper public input.

Under Paragraph (12), the question of "how does this regulation compare with those of the other states?" is **frankly irrelevant**. This is Pennsylvania. Whatever NJ, NY, CT, or CA wish to do is their business, and has no bearing on the definitions for Pennsylvanians.

Under Paragraph (14), the question asks "Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. **List the specific persons and/or groups who were involved.**"

The response is that the PHRC consulted with stakeholders in the **LGBTQ community, and the Governor's Office, and the New York City Commission on Human Rights**. Nowhere does it mention that the Pennsylvania public at large, religious leaders of PA, or any other Pennsylvania interested party was contacted or enlisted for comment. PA constituents don't give a flying fig what the NY City Commission on Human Rights thinks, nor should input from outside of PA have been solicited or chosen to impact a PA Regulation at any time. This is a PENNSYLVANIA matter.

Under Paragraph (16), the question asks for a listing of persons, groups,

or entities, including small businesses, that will be required to comply with the regulation.

This proposed regulation will **impact ALL employers in PA who employ four (4) or more individuals**. It also impacts housing providers, public accommodations, and schools.

Given that the Pennsylvania Human Relations Commission (PHRC) is comprised of appointed positions who were NOT elected by the voters of Pennsylvania, this redefining of terms that will impact decisions in the future on matters of sex, race, and religious creed without proper constituent input is reprehensible. **This IRRC 3339 must be struck down and never implemented in Pennsylvania.**

Respectfully,

Susan G. Mowrer  
[sgmowrer@comcast.net](mailto:sgmowrer@comcast.net)