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October 30, 2024

The Honorable Ann Dunkin
Senior Agency Official for Privacy
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear Ms. Dunkin,

I write to express my strong opposition to the Department of Energy's recent notice regarding the establishment of a new system of records, DOE-47, Reasonable Accommodation Requests Records (89 FR 78854). This system, which would collect and store information concerning employees and applicants requesting medical or religious accommodations, represents a grave violation of religious liberty as protected under the First Amendment and the Religious Freedom Restoration Act (RFRA).

While I understand the Department's intent to manage accommodation requests effectively, I am deeply concerned that collecting detailed records on an individual's sincerely held religious beliefs and practices—alongside other personal and sensitive information—poses a significant threat to the privacy and religious freedoms of federal employees. The federal government has an obligation to protect religious liberty, ensuring that individuals are not subject to unnecessary scrutiny or invasive data collection that could deter them from exercising their constitutionally protected rights.

The proposed system also risks creating an environment in which employees may feel compelled to disclose private details about their faith or religious practices in order to justify their accommodation requests. This can lead to potential religious discrimination or bias in the workplace. Furthermore, the inclusion of categories such as religious leaders' contact information and details on specific religious practices only deepens the potential for abuse or misuse of this data.

In light of these serious concerns, I urge the Department of Energy to reconsider the implementation of DOE-47 in its current form. I ask the Department to consider alternative ways to ensure reasonable accommodations are granted without compromising the privacy and religious liberties of federal employees. Thank you for your attention to this critical issue. I look forward to your response.

In God We Trust,



James Lankford
U.S. Senator for Oklahoma