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March 9, 2022

Charlotte A. Burrows, Chair  
U.S. Equal Employment Opportunity Commission  
131 M Street, NE  
Washington, DC 20507

Jenny R. Yang, Director  
Office of Federal Contract Compliance Programs  
U.S. Department of Labor  
200 Constitution Ave., NW  
Washington, DC 20210

**Re: Hiring Initiative to Reimagine Equity (HIRE)**

Dear Chair Burrows and Director Yang:

On behalf of our members and all Americans age 50 and older, AARP is pleased that the Equal Employment Opportunity Commission (EEOC) and the Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) have launched the Hiring Initiative to Reimagine Equity (HIRE) to help address key hiring and recruiting challenges that prevent or impede underrepresented communities from accessing good jobs. Given AARP's long history of fighting to remove hiring barriers based on discrimination particularly for older jobseekers, we request the opportunity to be included in this initiative on behalf of older workers.

AARP believes anyone age 50 and older who wants or needs to work should be able to work, and older workers should be included in this important national conversation on building an equitable workforce. The COVID-19 pandemic has been a public health crisis of unprecedented proportions and complexity that has resulted in a profound loss of human life as well as immense social and economic disruption. Unemployment in the United States rose to levels not seen in nearly 100 years, with older workers having lost jobs at a faster rate than others. As the U.S. workforce recovers from the impact of the pandemic, and even though unemployment is low overall, workers age 55 and older remain particularly hard hit by long-term unemployment. Age discrimination is a leading cause of older adults experiencing long-term unemployment at higher rates than their younger counterparts. The January 2022 jobs report showed that 31.3 percent of jobseekers ages 55 and older were long-term unemployed compared with 21.8 percent of jobseekers ages 16 to 54.

Now more than ever, older workers need assistance with their job searches and, in many cases, with retraining for a new job. While older workers already possess prior work experience, people skills, and work ethic, there is an increasing need for training, job placement, and other assistance to develop the employment potential of an aging workforce in a changing labor market. While labor markets are tight, employers often overlook older workers and their talents. Understanding the value of older workers and helping them re-enter the workforce not only helps older workers, but helps employers maintain a skilled workforce.

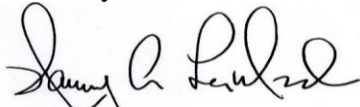
AARP would like to contribute to HIRE by helping to identify actionable strategies to promote organizational policies and practices that advance equity and to develop materials such as guidance documents and resources cataloging promising practices. AARP is already delivering on innovative initiatives to keep older workers in the workforce, including the following programs:

- **AARP Employer Pledge:** The Pledge is a nationwide group of over 1500 employers that stand with AARP in affirming the value of experienced workers and that are committed to developing diverse organizations. AARP encourages Pledge signers to take at least two actions to demonstrate their commitment to a multigenerational workforce.
- **Living, Learning, & Earning Longer Collaborative:** This collaborative includes the World Economic Forum, the Organisation for Economic Co-operation and Development (OECD), and over 50 global employers that identify and share multigenerational, inclusive workforce practices. As part of this initiative, we have developed the Growing with Age platform that offers employers policies and practices they could implement to support an age-diverse workforce.
- **Back to Work 50+:** This AARP Foundation program focuses on increasing the services and resources available to low-income 50+ job candidates to facilitate their access to in-demand jobs. AARP Foundation works with key partners to integrate local workforce services, public benefits application assistance, and employer engagement efforts to connect 50+ job candidates to specific in-demand jobs in their communities.
- **AARP Skills Builder for Work:** This online platform offers more than 300 courses in high-demand fields to help older workers gain in-demand skills to give them an edge in today's competitive job market. It was created in collaboration with MindEdge Learning, which provides online learning solutions to higher education, associations, and corporations.
- **The Future of Work for the 50+:** This platform contains research, resources, and insights from leading thought leaders and academics on the issues that will define work for decades to come. It highlights research insights on five megatrends: Longevity, Lifelong Learning, Income Inequality, Advances in Technology, and Contingent Work.
- **Senior Community Service Employment Program (SCSEP):** AARP Foundation SCSEP serves more than 12,000 people annually in 22 states through this federally funded community service and work-based job training program for low-income adults age 55 and older. AARP Foundation SCSEP successfully equips low-income older adults with skills and resources to build economic opportunities.

In addition to the workforce initiatives that AARP is spearheading, AARP has been involved with assisting older workers who face age discrimination in the workforce through litigation, both at the trial level and in federal and state appellate courts. In Congress, AARP supports two bills -- the Protecting Older Workers Against Discrimination Act (POWADA) and the Protect Older Job Applicants Act (POJA) -- that would strengthen worker protections under the Age Discrimination in Employment Act (ADEA) in the hiring process and on the job. AARP has also been addressing age discrimination at the state level. For example, AARP Connecticut successfully advocated for a law that prohibits an employer from asking for age-related information on an employment application. AARP is also examining the impact of Artificial Intelligence (AI) technologies on older adults and how these tools impact the hiring process.

Again, as a national leader in making sure people age 50 and older have the opportunity to work as long as they need or want, AARP would like to support this important initiative and contribute to the development of materials and resources to advance equity in recruitment and hiring practices, especially as it pertains to older workers. If you have questions, please feel free to contact Holly Biglow on our Government Affairs staff at [hbiglow@aarp.org](mailto:hbiglow@aarp.org) or (202) 570-3760.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy A. LeMond". The signature is fluid and cursive, with the first name "Nancy" and last name "LeMond" clearly distinguishable.

Nancy A. LeMond  
Executive Vice President and  
Chief Advocacy & Engagement Officer