

February 6, 2025

Josh Hawley  
U.S. Senator  
115 Russell Senate Office Building  
Washington, DC 20510

**RE: Labor Law Reform Policy Framework**

Dear Senator Hawley,

HR Policy Association (“Association”) understands the need for significant reform of our nation’s federal labor laws and welcomes any opportunity to support efforts to that end. In this spirit, we are providing our feedback on your proposed “Pro-Worker Framework.” While we share the commitment to achieving a more balanced and effective law, we believe the framework as currently outlined would have negative consequences for all stakeholders. As you move forward in developing bill text, we encourage you to consider alternative legislative solutions informed by the comprehensive input of American businesses, workers, and labor unions alike.

HR Policy Association is a public policy advocacy organization that represents the chief human resource officers of more than 350 of the largest corporations doing business in the United States and globally. Collectively, their companies employ more than 10 million employees in the United States – nearly 9 percent of the private sector workforce. Specifically, the Association represents a significant number of employers in Missouri with both unionized and non-union workforces. Since its founding, one of HRPAs principal missions has been to ensure that laws and policies affecting human resources are sound, practical, and responsive to labor and employment issues arising in the workplace. The Association supports labor law reform that promotes positive, stable labor relations and adjudication of disputes free from partisan policy oscillation.

The Association appreciates your efforts to reform the National Labor Relations Act (NLRA), which has largely remained unchanged for over half a century and accordingly does not fully reflect the realities of today’s workplaces or modern labor relations. However, we are concerned that the proposed framework leans heavily toward union priorities rather than introducing balanced, meaningful reforms that will benefit all stakeholders equally.

Our specific concerns regarding the proposed framework include the following:

- Provisions to shorten representation election timelines and ban certain employer-held meetings, for example, limit employee access to information and context, including the time period employees have to digest such information, while simultaneously muzzling employers in violation of their free speech rights under both the First Amendment and the Section 8(c) of the NLRA. Such provisions rush employees into choosing union representation without full information and, therefore, restrict employees' ability to make informed decisions about representation.
- Similarly, provisions to force initial collective bargaining agreements would allow federal regulators to dictate contractual terms for workplaces about which they have limited and incomplete information. The collective bargaining process, while at times contentious, is informed by parties (the employer, the union, and the employees) who know what is best for their workplace and is meant to produce compromises that benefit all stakeholders. Allowing forced arbitration of such agreements could result in contracts that do not work effectively for anyone and could jeopardize the viability of the business on which the workers rely for their livelihood.

There is a clear need to update the NLRA in ways that best serve the workplaces of the future and better promote positive labor relations. There is also a clear need to reform the National Labor Relations Board structure and processes to end the current partisan policy oscillation at the Board that benefits no one. The Association supports legislation that addresses these needs and is eager to work with lawmakers on a balanced framework that promotes stability, fairness, and long-term success for all stakeholders.

We welcome the opportunity to work with you and your colleagues in the Senate to develop a new proposal that better meets the goals outlined above.

Sincerely,



Greg Hoff  
Assistant General Counsel,  
Director, Labor and  
Employment Law and Policy  
HR Policy Association

CC: Members of the U.S. Senate, U.S. House of Representatives