

May 8, 2020

Dear Members of Congress:

We, the undersigned, are a diverse coalition of religious organizations, houses of worship, religious leaders, and a law firm dedicated to defending and restoring religious liberty in America. We are each concerned about a new threat to our nation's faith communities: a swarm of lawsuits blaming houses of worship and religious ministries for any person who attended a religious gathering or received food or shelter from a charity or ministry and subsequently contracted COVID-19.

Although these lawsuits should eventually prove meritless, the cost of defending against them would have devastating consequences. Many of the same religious organizations who rushed to provide aid and comfort to those affected by COVID-19 now find themselves struggling financially. And a wave of lawsuits would force many to cease their operations, whether due to the cost of litigation, or the mere specter of it.

We have, and continue, to support prudent efforts to balance public health with the desire to "reopen America." But in the wake of the COVID-19 pandemic, there has been a proliferation of complex and often contradictory orders and guidelines at the state, county, and local levels, each purporting to govern when and how to reopen. Unfortunately, no religious organization—or any organization—can follow every guideline or order that has been issued around the country.

We are concerned that some people—and their lawyers—will cherry pick certain guidelines from around the nation in order to assign liability to religious organizations. They might claim that a religious organization or a house of worship was negligent because it did not follow a single recommendation buried deep within a set of guidelines. Or they might claim that, even though the religious organization or house of worship was careful to follow all relevant guidelines and orders, it is nonetheless negligent because it did not follow a more stringent guideline issued in a town a thousand miles away.

This is a novel problem arising from the speed with which seemingly every state and local government in America developed their own, independent orders and guidelines. The problem will soon become even more acute as state and local governments across the nation transition to reopening, but each in a slightly different manner and at a different speed.

We must not permit religious organizations to be blamed or held liable for negligence because a food pantry in Wyoming did not follow an artificial amalgamation of every guideline from Washington to Florida. And even if the courts agree, the number of lawsuits attempting to apply that artificial standard may shut down the food pantry long before it has a chance of winning its case in court. Indeed, the mere threat of litigation may cause many religious organizations to remain closed far beyond what is necessary.



To avoid these unintended consequences, we propose that Congress include in the next iteration of COVID-19 economic relief legislation immunity for religious organizations from negligence suits resulting from their serving the public or reopening in accordance with local orders. Such protection could be modeled generally after the COVID-19 laws and orders that limit liability for medical professionals and commercial entities that manufacture and sell protective equipment by establishing a gross negligence or willful misconduct standard. This simple, common sense solution will provide religious organizations desperately needed protection from simple negligence lawsuits.1

Providing this reasonable measure of protection to religious organizations and houses of worship in America will ensure that they can continue performing their vital functions of serving Americans and ministering to all of our spiritual and physical needs. Moreover, it will also reassure ministries that voluntarily closed that they can reopen in order to resume serving their communities. Without this protection, many ministries may feel that they cannot reopen because a lawyer may claim that they are negligent in not following the standards of another industry or even another state. And some of those who do open may find themselves facing the very lawsuits we fear.

America's faith communities and places of worship have always been at the forefront of ensuring that the hungry are fed, the naked are clothed, and the homeless are sheltered. The undersigned organizations and individuals urge Congress to provide the assurance that America's faith communities can continue to be good Samaritans to the oppressed and the downtrodden as our nation begins its slow rebuilding.

Sincerely,

1 See, e.g., Ariz. Exec. Order No. 2020-27 (Apr. 9, 2020) (limiting liability of licensed health care professionals, registered volunteer health care professions, emergency medical care technicians, healthcare institutions, and entities operating modular field treatment facilities to gross negligence or reckless or willful misconduct), Conn. Exec. Order No. 7V (Apr. 7, 2020) (limiting liability of health care professionals and facilities to acts or omissions that constitute a crime, involve fraud, malice, gross negligence, willful misconduct, or would constitute a false claim), Ill. COVID-19 Exec. Order No. 17 (Apr. 1, 2020) (limiting liability of health care facilities, professionals, and volunteers to gross negligence or willful misconduct), Mich. Exec. Order No. 2020-30 (Mar. 29, 2020) (limiting liability of any licensed health care professional or designated health care facility to gross negligence), Miss. Exec. Order No. 1471 (Apr. 10, 2020) (limiting liability of healthcare professionals and facilities to acts or omissions that constitute a crime, fraud, malice, reckless disregard, willful misconduct, or would otherwise constitute a false claim), N.I. Exec. Order No. 112 (Apr. 1, 2020) (limiting liability of any licensed health care professional or individual granted a temporary license to practice in connection with the state's COVID-19 response to acts or omissions that constitute a crime, actual fraud, gross negligence or willful misconduct), N.Y. Exec. Order No. 202.10 (Mar. 23, 2020) (limiting liability of medical professionals to gross negligence), N.Y. S. 7506 / A. 9506 (enacted Apr. 3, 2020) (limiting liability of health care facilities and providers acting in good faith to willful or intentional criminal misconduct, gross negligence, reckless misconduct, or intentional infliction of harm), Ky. S.B. 150 (enacted Mar. 30, 2020) (providing that health care providers and businesses that make protective equipment in response to COVID-19 that ordinarily do not make such products are generally not subject to liability for ordinary negligence).



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