

February 8, 2023

To: U.S. Equal Employment Opportunity Commission

Re: Agency Docket No. EEOC-2022-0006, Draft Strategic Enforcement Plan for 2023 – 2027

I. Introduction

The Sikh Coalition submits this public comment in response to the “Draft Strategic Enforcement Plan” notice published by the U.S. Equal Employment Opportunity Commission, soliciting comments on Docket No. EEOC-2022-0006¹.

By way of introduction, the Sikh Coalition is the nation’s largest Sikh American legal and civil rights organization. The Sikh Coalition owes its existence in large part to the effort to combat bias against Sikh-Americans² after September 11, 2001, including hate crimes, police profiling, employment discrimination, school harassment, and other forms of discrimination. Since then, our organization has led several high-profile efforts to combat and prevent employment discrimination against Sikh Americans, including strengthening state anti-discrimination laws and litigating pattern and practice employment discrimination cases (in multiple cases, alongside the EEOC).

Despite that passage of over two decades, Sikhs remain disproportionately vulnerable to all forms of discrimination, particularly those Sikhs who maintain the mandated articles of faith (such as unshorn hair/beards and turbans). Indeed, Sikhs are often subjected to employment discrimination because of their actual or perceived race, ethnicity, national origin, immigration status, English language proficiency, accent and religion - as well as the intersectionality of these identities and characteristics. Federal hate crime statistics suggest that Sikhs may be hundreds of times more likely than other Americans to experience discrimination and bias. Studies also show that Sikh Americans experience disproportionately high rates of workplace discrimination.³ As an organization, we receive a high volume of legal intakes from Sikh

¹ See also 88 FR 1379 (proposed Jan. 10, 2023).

² Sikhism is the fifth largest world religion, with over 25 million followers with an estimated half a million Sikhs living within the United States. Sikhism was founded in Punjab, India in 1469 by Guru Nanak, who rejected the caste system and declared all human beings equal. The Sikh religion is monotheistic, believing in one God that is all all-pervading. This God of love is obtained through grace and sought by service to humankind. Observant Sikhs are required to wear a religious uniform consisting of certain articles of faith, such as Kesh (uncut hair) and turbans (which are worn by men and some women). The articles of faith distinguish a Sikh and have deep spiritual significance.

³ In 2006, the Sikh Coalition surveyed over 1,000 Sikhs in New York City; nine percent of respondents reported that they had been refused employment or denied a job promotion because of their Sikh identity. In 2009, the Sikh Coalition surveyed over 1,300 Sikhs in the California Bay Area; 12 percent of respondents believed that they had been refused employment because of their religious identity. See Sikh Coalition, *Making Our Voices Heard: A Civil Rights Agenda for New York City’s Sikhs* 5, 12 (2008), <https://www.sikhcoalition.org/wp-content/uploads/2016/11/Making-Our-Voices-Heard.pdf>, and

Americans alleging violations of Title VII of the Civil Rights Act of 1964 (Title VII) and other federal, state, and local employment discrimination laws.⁴

The Sikh Coalition broadly endorses the EEOC's Strategic Enforcement Plan for 2023-2027 ("Draft SEP"), particularly the agency's targeted approach to enforcement and focus on strategic impact, i.e., systemic enforcement of pattern and practice discrimination having broad impact, as well as its focus on vulnerable and underserved workers. The Draft SEP's subject matter priorities that particularly resonate with our organization relative to employment discrimination against Sikhs include (but are not limited to) discrimination influenced by or is backlash to current events, discrimination influenced by the COVID-19 pandemic, and other emerging trends of discrimination. We take this opportunity to elaborate further on several of these topics as they relate to Sikhs, and ask that the EEOC prioritize enforcement efforts that disparately impact Sikhs and other underserved, vulnerable communities.

II. Addressing Backlash Discrimination

Our organization endorses the Draft SEP's commitment to prioritizing emerging or developing issues – and specifically addressing discrimination influenced by or arising as backlash in response to local, national or global events. As the EEOC explicitly recognizes in the Draft SEP (see § II(C)(3)(c)), Sikhs are disproportionately vulnerable to backlash discrimination. Some examples of this backlash towards Sikhs include, but are not limited to:

- 9/11 terrorist attacks: In the first month after the September 11, 2001 attacks, the Sikh Coalition documented over 300 cases of violence and discrimination against Sikh Americans throughout the United States.⁵
- November 2015 Paris, France and December 2015 San Bernardino, CA terrorist attacks: The Sikh Coalition received three times as many legal intakes (predominantly hate crime and profiling-related) during December of 2015, than it had in the December of previous years.⁶
- 2016-2017 divisive anti-immigrant and anti-Muslim political rhetoric and policies: The FBI reported that from 2017 to 2018 hate crimes against Sikhs increased by 200%, which our organization can only surmise was the result of divisive political rhetoric and policies by the most powerful members of our country's political leadership.⁷

Sikh Coalition Bay Area Civil Rights Report 2010 5, 8, 21 (2010), http://www.sikhcoalition.org/documents/pdf/Bay_Area_Civil_Rights_Agenda.pdf.

⁴ Due to the frequency of discrimination complaints the Sikh Coalition receives, we published a guide for public and private sector employers to implement legally-grounded and culturally-competent practices that counter workplace discrimination and lead to a more welcoming and inclusive environment for all. See the Sikh Coalition, *Accommodating Sikhs in the Workplace: An Employer's Guide* (June 2, 2022), <https://www.sikhcoalition.org/wp-content/uploads/2022/06/Sikhism-Employers-Guide-Electronic.pdf>.

⁵ Moni Busu, *15 years after 9/11, Sikhs still victims of anti-Muslim hate crimes*, CNN (Sept. 15, 2016), <https://www.cnn.com/2016/09/15/us/sikh-hate-crime-victims/index.html>.

⁶ See Victoria Kim, Joseph Serna, *For Sikhs, often mistaken as Muslims, it's "a hostile time, a scary time"*, LA Times (Dec. 29, 2015), <https://www.latimes.com/local/california/la-me-sikhs-20151229-story.html>

⁷ See *2018 FBI Hate Crime Statistics*, Federal Bureau of Investigation (Nov. 12, 2019), available at <https://ucr.fbi.gov/hate-crime/2018>.

The forms of backlash that the Sikh community are most often subject to in response to local, national or global events are hate crimes, law enforcement profiling and school discrimination (not only harassment but often school-based hate crimes). These patterns of systemic discrimination faced by communities of color, including Sikhs and other vulnerable communities, underscore the agency's need to update and refine subject matter priorities that promote fairer and more inclusive workplaces.

III. Systemic Discrimination: PPE

A. Background

One systemic discrimination issue that observant Sikhs face is denials of religious accommodation related to the wear of personal protective equipment (PPE). Employers routinely deny religious accommodations to observant Sikhs to ostensibly comply with federal and/or state safety requirements mandating the use of PPE. In many instances, however, employers fail to adequately engage in the interactive process and explore forms of reasonable accommodation – such as alternative equipment, new technologies, etc. – that would allow employees to maintain the tenets of their faith while working in a safe manner that complies with all applicable health and safety standards. As a result, Sikhs have been discriminatorily terminated, denied jobs, segregated and/or chilled from applying to certain types of jobs – particularly those requiring that employees be clean-shaven in order to don tight-fitting respirators. These industries include (but are not limited to) healthcare (including medical and dental), law enforcement / corrections, firefighting, emergency and first responders, commercial airlines and some construction.

We know that the EEOC shares our concern that employers are discriminatorily denying employees religious (as well as medical) PPE-related accommodations when undue hardship is not imposed. This concern is evidenced by the agency's recently filed class action lawsuit against Global Medical Response, Inc. and its subsidiaries which unlawfully denied EMT and paramedic applicants and employees (including a Sikh Coalition client) the use of a respirator in place of an N95 that would have allowed them to maintain their facial hair and perform their jobs safely.⁸

This issue disproportionately impacts not only Sikhs and other minorities who maintain beards for religious reasons, but also those who cannot shave due to skin conditions like Pseudofolliculitis Barbae (PFB). We understand that individuals with PFB are subject to a painful skin condition when they shave, and that PFB disproportionately impacts African-Americans and Latinos. PPE-related employment discrimination, therefore, also has disability and racial justice implications.

B. COVID-19 Pandemic and N95 Respirator Requirements

⁸ See EEOC Press Release, *EEOC Sues Global Medical Response and American Medical Response for Religious and Disability Discrimination* (Oct. 26, 2022), <https://www.eeoc.gov/newsroom/eeoc-sues-global-medical-response-and-american-medical-response-religious-and-disability>.

As the EEOC properly recognizes in its draft SEP, the COVID-19 pandemic has posed a raft of new, systemic equal employment opportunity challenges. One of the systemic PPE issues that Sikhs face arose during the pandemic. In the first year after the pandemic, the Sikh Coalition fielded over two dozen requests for legal assistance from Sikh (and some Muslim) healthcare workers (as well as some law enforcement and corrections officers) who were told to shave their religiously mandated beards in order to comply with fit testing for tight-fitting N95 respirators, and/or were denied religious accommodations⁹. These healthcare workers included physicians, medical and dental students, paramedics, occupational therapists, and hospital support staff. They worked on the front lines of the COVID-19 pandemic and most had not previously been subject to employer policies requiring them to shave their facial hair to wear N95 respirators.

The employers in these cases generally misinterpreted Occupational Safety & Health Administration (OSHA) regulations¹⁰ as wholesale mandating that employees with facial hair shave to be fitted for N95 respirators and/or that employees must always be clean shaven in order to maintain a state of “N95 readiness”. In fact, OSHA regulations and interpretation make clear that employers are obligated to provide appropriate PPE based on both the job specifications and the individual employee’s needs.¹¹ Notwithstanding, administrators blindly and bureaucratically followed employer-created respirator policies and often failed to consider the equal employment opportunity repercussions of mandating that employees shave to wear N95s. Specifically, these administrators failed to consider whether employees could be accommodated in a manner that allowed them to work safely while maintaining their religiously mandated facial hair.¹² Many of these employers only granted their employees’ accommodation requests after our attorneys’ intervention. Mutually acceptable solutions to the use of tight-fitting N95s included, for example, the use of 1) loose-fitting powered air-purifying respirators (PAPRs), and 2) a beard band/beard guard along with an N95.¹³ (For tight-fitting PPE like N95s, OSHA regs require that facial hair not come in contact with the seal; the beard band remedies this issue in a safe manner.)

⁹ See written testimony of Amrith Kaur, EEOC Meeting on Civil Rights Implications of Covid-19 Pandemic (Apr. 28, 2021), <https://www.eeoc.gov/meetings/meeting-april-28-2021-workplace-civil-rights-implications-covid-19-pandemic/kaur>.

¹⁰ See e.g., 29 CFR 1919.134(g)(1)(i)(A) (disallowing employers from permitting employees with “[f]acial hair that comes between the sealing surface of [a tightfitting] facepiece and the face or that interferes with valve function” to wear respirators with tight-fitting facepieces).

¹¹ See, e.g., 29 CR 1910.132 (d)(1) & 1910.134(d)(1), interpretation letter from Kimberly A. Stille, Acting Dir., Dir. of Enf. Prgms., OSHA to Amrith Kaur Aakre, Legal Dir., The Sikh Coalition (Dec. 16, 2021), <https://www.osha.gov/laws-regs/standardinterpretations/2021-12-16>.

¹² We understand that employees who could not shave for medical reasons faced similar EEO challenges. See, e.g., Evan Simko-Bednarski & Anna Sturla, *25 officers who refused to shave their beards put on leave until the pandemic ends*, CNN (Apr. 30, 2020), <https://www.cnn.com/2020/04/30/us/prince-george-shave-police-leave-trnd/index.html>.

¹³ A beard guard or rubber sheath worn under an N95 may create a seal and protect a bearded wearer as effectively as being clean shaven. See R. Singh, et al., *Under-mask beard cover (Singh Thattha technique) for donning respirator masks in COVID-19 patient care*, 106 J. HOSP. INFECT. 782 (2020), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7532752/>; S. Prince, et al., *Assessing the effect of beard hair lengths on face masks used as personal protective equipment during the COVID-19 pandemic*, 31 J. EXP. SCI. ENV. EPID. 953 (2021). <https://www.nature.com/articles/s41370-021-00337-1>.

C. Emerging Systemic Issue: Bearded Pilots & Oxygen Masks

An emerging, systemic PPE-related issue that the Sikh Coalition would like to flag for the EEOC is discrimination against bearded pilots in the commercial airline industry. In the past year, the Sikh Coalition has been contacted separately by five observant, bearded Sikhs who were denied religious accommodations, constructively terminated and/or chilled from applying as pilots in the commercial airline industry due to grooming standards that require pilots to be clean shaven. We understand that a majority of commercial airlines in this country subscribe to the belief that beards interfere with the proper wear of oxygen masks and thus pose a safety hazard, relying ostensibly on Federal Aviation Administration (FAA) guidance and manufacturer specifications. Notwithstanding, we are aware of at least one American commercial airline (Hawaiian Airlines) which allows pilots to maintain beards; in addition, a number of US-based large charter airlines allow pilots to maintain beards. Moreover, we are aware that bearded pilots are employed by and fly safely around the world (including into and out of the U.S.) for a raft of international airlines such as British Airways, Air Canada, Air India, Emirates and many more.

To be clear, we do not believe that accommodating bearded pilots would pose an undue hardship, i.e., a safety risk, on airlines. Our organization recently consulted with the FAA, which advised us that their policies do not require that commercial airline pilots be clean-shaven to use oxygen masks. Our investigation indicates that American-based government research on oxygen masks is many decades old, and tested antique equipment. In contrast, approximately five years ago Air Canada commissioned a study on whether bearded pilots could safely use modern oxygen masks. Based upon the conclusion of that study, the airline began hiring bearded Sikh pilots.¹⁴ Accordingly, it appears that most US-based commercial airlines are incorrectly interpreting federal regulations, inappropriately evaluating risk mitigation (e.g., any harm may be speculative or antiquated) and/or failing to consider advances in oxygen mask technology. These deficits have resulted in an adverse discriminatory impact on pilot employees and applicants who cannot remove their facial hair for religious and medical reasons, including racial and ethnic minorities.

D. EEOC Must Prioritize Enforcement of PPE-Related Discrimination

PPE-related gaps that disparately impact religious, racial, and ethnic minorities, including those with medical conditions and other underserved populations, must be narrowed. Aside from case-related enforcement (like the GMR litigation), we ask that the EEOC take the following two enforcement actions with respect to PPE-related discrimination.

First, under the umbrella of its strategic enforcement goal of “integrating education and outreach activities,” we ask that the EEOC proactively engage with employers who require the use of

¹⁴ See Diane Mar-Nicolle, Simon Fraser Univ., *SFU study busts myth about facial hair on pilots* (Sept. 14, 2018), <https://www.sfu.ca/science/news/2018-news/sfu-study-busts-myth-about-facial-hair-on-pilots.html>.

PPE.¹⁵ Specifically, we urge the agency to educate employers and industries which routinely use PPE subject to federal and state safety standards about their responsibilities under Title VII and the ADA. This not only includes ensuring that employers understand their legal requirement to accommodate absent undue hardship but also the expectation that employers engage in the interactive process. Specifically, the EEOC must educate these employers about their duty to engage and attempt to find a solution that works for individual employees – instead of using a bureaucratic “one size fits all” approach. Employers should understand that they have a duty to provide employees who request religious and medical accommodations with appropriate PPE as it relates to both their job duties and individual needs. We also ask the EEOC to educate state Fair Employment Practices Agencies (FEPAs) that also “play an important role in enforcing laws prohibiting employment discrimination” about these issues.

Second, to further its commitment “to integrating the SEP priorities into its education and outreach activities by promoting promising practices for employers to help prevent discrimination from occurring,” we ask that the EEOC encourage research and development of PPE technologies that promote equal employment opportunity. As “the EEOC is the government’s lead agency on equal employment opportunity” it has a unique opportunity to help further and encourage “promising practices” and can help encourage more robust research and development that advances the needs of underserved communities.

Here, we ask that the EEOC specifically collaborate with agencies that establish safety regulations and/or certify safety equipment / PPE such as OSHA¹⁶, National Institute for Occupational Safety & Health (NIOSH)¹⁷ and FAA to clarify interpretation of safety policies to provide accommodations consistent with federal anti-discrimination law. Furthermore, the EEOC should encourage regulating and certifying bodies to use and explore “promising activities” such as the use of alternative PPE products or adaptations (i.e., beard bands) that better meet the safety needs of employers and allow individuals to maintain facial hair. Likewise, we encourage EEOC to conduct trainings for industries subject to PPE-related safety regulations including, but not limited to, commercial aviation, health care, first responders, correctional facilities, and law enforcement.

These steps taken in conjunction are necessary to help ensure that “all employers adopt policies and practices to help prevent employment discrimination and advance equal employment opportunity.” This action would also further the EEOC’s directive pursuant to Executive Order 13985 on “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government”.

¹⁵ This request also falls under the SEP’s identified strategy of “providing up-to-date, accessible guidance on the requirements of employment discrimination laws.”

¹⁶ See the Sikh Coalition, Public Comment Docket No. OSHA-2020-0004, Occupational Exposure to COVID-19; Emergency Temporary Standard (Aug. 20, 2021), <https://www.sikhcoalition.org/wp-content/uploads/2021/08/210820-public-comment-OSHA.pdf>

¹⁷ See the Sikh Coalition, Request for Information, Needs and Challenges in Personal Protective Equipment (PPE) Use for Underserved User Populations, Docket No. 2021-13263 (Aug. 23, 2021), <https://www.sikhcoalition.org/wp-content/uploads/2021/08/210823-public-comment-NIOSH.pdf>

IV. Systemic Discrimination Issue: Hair Testing

One developing systemic EEO issue that the Sikh Coalition would like to flag for the EEOC's enforcement efforts is the discriminatory disparate impact of hair testing on religious, racial and ethnic minorities. Employers are increasingly using hair testing as a means for drug testing across a variety of industries because it ostensibly provides more data on potential historic drug use - and Congress has mandated that the transportation industry use hair testing subject to federal regulation.¹⁸ Notwithstanding, a federally regulated and authorized, consistent and reliable scientific scheme does not yet exist for employers to conduct hair testing.

The Sikh Coalition has at least two specific EEO concerns related to hair testing:¹⁹ A) the disparate impact that false positives may have on dark-haired people, i.e., brown and black-skinned people including (but not limited to) Punjabis, South Asians, and Sikhs who overwhelmingly have brown or black hair, and B) the difficulty in obtaining religious accommodation to hair testing by observant Sikhs and other religious minorities who maintain unshorn hair.²⁰

A. Hair Testing False Positives of Dark-Haired People

Scientific research indicates that black and brown hair samples submitted for testing are subject to a higher rate of false positives.²¹ This translates to tangible adverse employment impact on racial and ethnic minority employees who submit these samples, as evidenced by the *Jones v. City of Boston* federal appellate case.²² While some employers dispute this science, even HHS – the very agency that Congress mandated to study and regulate scientific hair testing methods – has specifically expressed concern over scientific findings of potential bias in hair testing results. Consequently, in its proposed regulations on hair testing, it requested additional data and studies from the scientific community about methods of hair testing that minimize false positives and maximize reliability.²³

¹⁸ In 2015, Congress mandated that the U.S. Department of Health and Human Services (HHS) issue scientific and technical guidelines for hair testing as a method of detecting the use of controlled substances. See Public Law 114-94, Fixing America's Surface Transportation Act ("FAST Act"). While HHS proposed a draft regulation in 2020, it has not yet promulgated final regulations around hair-based drug testing. See 85 Fed. Reg. 56108 (proposed Sept. 9, 2020).

¹⁹ See the Sikh Coalition and North American Punjabi Trucking Association, In Response To Notice Of Proposed Rulemaking Docket No. SAMHSA-2020-0001 (Nov. 9, 2020), <https://www.regulations.gov/comment/SAMHSA-2020-0001-0183>.

²⁰ Maintaining unshorn kesh (hair) is one of the primary means through which most Sikhs practice their faith. This religious mandate includes not only hair on the head, but all body hair (including facial hair) for men and women. Maintaining kesh unshorn is rooted in the Sikh belief that hair is a divine gift; thus, maintaining it unshorn is considered living in harmony with the will of God. The Sikh religious code of conduct (the Rehat Maryada) explicitly forbids the removal or cutting of any hair, and doing so weakens a Sikh's connection to God and to the Sikh religious community.

²¹ See *Jones v. City of Bos.*, 752 F.3d 38 (1st Cir. 2014).

²² See *id.* and *Jones v. City of Bos.*, 845 F.3d 28 (1st Cir. 2016).

²³ See 85 Fed. Reg. 56113–56115 (proposed Sept. 9, 2020).

Moreover, in those draft regulations HHS proposed a very cautious approach to hair testing – using a two-test method, i.e., collecting and testing an authorized alternate specimen (urine or oral fluids) simultaneously or if a donor cannot explain a positive hair testing result, and notifying the agency of a positive hair test only if the alternative specimen (or the donor’s admission of illicit drug use) corroborates the hair testing result.²⁴ HHS’s proposed two-test system on its face undermines confidence in hair testing, particularly the disparate impact on racial, ethnic and religious minorities.

B. Failure to Provide Religious Accommodations to Hair Testing

The EEOC is well aware that observant Sikhs have been subject to discriminatory denials of religious accommodation for failing to submit hair samples for drug testing. In 2016, the agency brokered a settlement between three Sikh Coalition clients and national transportation employer JB Hunt, after a seven-year investigation during which it concluded that the employer had, in fact, discriminated against the Sikh truck drivers in violation of Title VII by failing to provide religious accommodations to hair testing requirements.²⁵ During the course of the agency’s investigation, J.B. Hunt revised its written policies and procedures regarding discrimination and religious accommodations, and established an alternative to drug testing by hair sample for those who require religious accommodations.

Confusion around the availability of religious accommodations for hair testing is so endemic that in the past decade the Sikh Coalition has received legal intakes from not only limited English proficient immigrant truck drivers, but also highly-educated, English-speaking white collar technology employees and even a physician requesting assistance in this regard.

Often, managers who make hiring and related employment decisions are ignorant of their obligations under federal and state anti-discrimination law. While employers are generally knowledgeable of their duty not to discriminate on the basis of race or sex, the duty to accommodate religious practices is often completely unknown and therefore overlooked by employers. And even when employers do understand the law, the applicable standard for “undue hardship” (interpreted as a *de minimus* cost or burden²⁶) is so low that employers feel emboldened to deny requests for religious accommodation – even when no hardship actually exists. (The JB Hunt case exemplifies this.)

In addition, employers often fail to accommodate requests for religious accommodation because drug testing (particularly pre-employment) is normally outsourced to third-party laboratories. Third-party techs administering drug testing often fail to recognize that they are acting as agents of the employer, and are normally untrained to respond to requests for religious accommodation.

²⁴ See *id.* at 56114.

²⁵ Dan Weikel, *Sikh truck drivers reach accord in religious discrimination case involving a major shipping company*, LA TIMES (Nov. 15, 2016), <https://www.latimes.com/local/lanow/la-me-ln-sikh-truckers-20161115-story.html>.

²⁶ See *TWA v. Hardison*, 432 U.S. 63, 97 S. Ct. 2264 (1977).

Our concerns about employers failing to provide religious accommodations for hair testing is particularly acute in the commercial trucking industry because (as previously mentioned) our federal legislature itself has mandated hair testing in this industry subject to HHS promulgating final regulations²⁷, an ever-growing number of Sikhs work as truck drivers²⁸, and a disproportionate number of Sikh drivers are limited English proficient immigrants. Many of these immigrants have a limited understanding of their legal rights and limited ability to advocate for themselves when those rights are denied. Note, for example, in the aforementioned case against J.B. Hunt, two of our three clients who were denied hair testing religious accommodations were limited English proficient, and all three clients were immigrants.

V. Conclusion

The Sikh Coalition appreciates this opportunity to submit this public comment on Docket No. EEOC-2022-0006. Our organization continues to be available to collaborate and share resources with the Agency to ensure that Sikhs and other vulnerable minorities are not subject to discrimination in employment.

Harsimran Kaur, Senior Counsel
Amreen Partap Singh Bhasin, Staff Attorney
The Sikh Coalition
165 Broadway, Office 2359,
New York, NY 10006

²⁷ See *supra* fn. 13 regarding Public Law 114-94.

²⁸ In 2018, a news article cited that 30,000 Sikh-American drivers had entered the industry within the last two years alone. See Jim Axelrod, *More Than 30,000 Indian-American Sikhs have entered the trucking industry in 2 Years*, CBSNEWS.COM (November 23, 2018), <https://www.cbsnews.com/news/sikh-indian-americans-becoming-truckers-mintu-pandher-laramie-wyoming/>. See also Jaweed Kaleem, *Sikh drivers are transforming US Trucking. Take a ride along the Punjabi-American highway*, LA TIMES (Jun. 27, 2019), <https://www.latimes.com/nation/la-na-col1-sikh-truckers-20190627-htmlstory.html>.