

Lawyers' Committee for Civil Rights Under Law
2021 Civil Rights Priorities for the
Administration of President Joe Biden and Vice President Kamala Harris
and the 117th Congress

During recent years, civil rights have increasingly been under attack, and we have experienced a period of retrenchment after decades of a long march towards racial equity and equality under the law. The federal government has abnegated its historic commitment to protecting civil rights in states and communities across the nation, even adopting some positions that are antithetical to civil rights, racial justice, and human rights. Millions of Americans have taken to the streets in protest as part of the Movement for Black Lives, and in solidarity with the immigrant community, LGBTQ people, and other people of color whose rights have been threatened. Now, the Biden-Harris Administration and the 117th Congress must simultaneously confront the challenges of racial injustice, an ongoing and deadly pandemic, and a deep recession, while rebuilding and fortifying the institutions of our democracy and justice system. Our 2021 Civil Rights Priorities provide a framework for meeting these challenges through Executive and Regulatory Action, which can be taken up immediately; Enforcement Action; and Legislation.

EXECUTIVE AND REGULATORY ACTION

In addition to these affirmative priorities, the Biden-Harris Administration should rescind or suspend action on proposed rules or guidance under development, or not yet finalized, by all federal agencies that would have the effect of weakening civil rights protections, or that would make it more difficult to detect and seek redress for civil rights violations.

COVID-19 Cross-Cutting Priorities

- **President Biden should issue an immediate emergency temporary standard (ETS) to protect all workers from exposure to COVID-19 in the workplace, and take all necessary steps to create a permanent, comprehensive infectious disease standard.**
- **President Biden should issue an executive order to establish a multi-agency taskforce to provide the coordination necessary to address the impacts of COVID-19 on communities of color from both a public health and economic perspective.** The multi-agency task force shall incorporate recommendations and oversight on disparities in public health and economic response, as identified by the newly established COVID-19 Racial and Ethnic Disparities Task Force.
- The pandemic presents unique challenges to privacy rights, as companies and local governments develop surveillance technologies to track the virus' spread. **The Department of Labor (DOL) should conduct a rulemaking to protect worker privacy due to the increasing use of these technologies, particularly as a condition of employment for front-line workers.**

Federal Courts and Judicial Diversity

- **President Biden should appoint experts in civil rights litigation to the planned bi-partisan Court Reform Commission to ensure that recommendations to reform the**

court system take into account the impact of the courts on the rights and lives of Black Americans, and other people of color and underrepresented groups in America. Over several decades, federal courts have ensured the protection of constitutional rights and liberties of Black Americans and other underrepresented people. From desegregation of public schools to protecting the right to vote, the federal courts have ensured people of color and other underrepresented people can participate fully and equally in American society under the law—particularly in states where they do not comprise the majority and are unable to elect a legislature that protects their civil rights.

- **President Biden should select and appoint fair and impartial nominees to the federal courts who reflect the rich racial and ethnic diversity of the United States.** While American society has made strides in racial integration in the years following *Brown*, there has been slow progress in achieving racial and ethnic diversity on the federal bench. The current federal judiciary does not reflect the racial or ethnic diversity of the country, as 80 percent of federal judges are white, and only 10 percent are African American, 7 percent are Hispanic, and 2.6 percent are Asian. Native American and Alaska Natives are barely represented at all. These percentages do not mirror the broader demographics of the United States: 60 percent white, 12.5 percent Black, 18.3 percent Hispanic, 5.7 percent Asian, and approximately 2 percent Native American. It is important that judges reflect and represent the different backgrounds, communities, and experiences of the American public as greater representation builds greater trust in the federal judiciary and can reduce perceptions of bias often associated with the courts by people of color. Future appointees should better reflect the rich racial and ethnic diversity of our country.

Voting Rights and Democracy

- **President Biden should issue an executive order to create a national taskforce to examine challenges to our democracy and the right to vote, and to propose new policies, programs, and laws to protect our democracy and the ability of Americans to participate through the fundamental right to vote.**

Census

- **President Biden should rescind President Trump's Executive Order on Collecting Information about Citizenship Status in Connection with the Decennial Census.**
- **President Biden should rescind President Trump's Presidential Memorandum on Excluding Illegal Aliens from the Apportionment Base Following the 2020 Census.**

Economic Justice & Employee Rights

- **President Biden should rescind President Trump's Executive Order on combating race and sex stereotyping and related Office of Management & Budget (OMB) requirements, which limits the types of diversity, equity, and inclusion (DEI) trainings federal agencies, contractors, and grantees can conduct.**
- **President Biden should issue a new Executive Order mandating that federal contractors allow their employees to publicly discuss their salary and benefits, and requiring federal contractors to report average salaries and wages for positions, with disclosure of any disparities by race, ethnicity, and gender.**
- **President Biden's Administration should support the reinstatement of the EEO-1 pay data collection, which requires large employers to identify the number of**

employees in job groups by race and sex, as well as supporting the addition of gender and race pay data to the report.

Criminal Justice Reform

- The use of “no knock” warrants too often ends in violence that could have been avoided with the police announcing themselves and, as a result, degrades trust with communities of color. **President Biden should issue an executive order, or take other executive action, prohibiting federal agents from using “no knock” warrants except in the most serious of cases and under the most extreme of circumstances.** At a minimum, the order (or action) should prohibit the use of such warrants for drug-related cases.
- **President Biden should issue an executive order, or take other executive action, to stop federal prosecutions seeking the death penalty, and to create a moratorium on executions for the federal prisoners who are awaiting the death penalty.**
- Citing a person and instructing that person to return for a court date is an underused alternative to arresting and detaining that person until the first court appearance, particularly for lower-level offenses. The underuse of citations in lieu of arrests subjects people of color in over-policed communities to the destructive consequences of a period of detention and cumulatively destroys trusts with those communities. **President Biden should issue an executive order, or take other executive action, mandating that federal law enforcement agencies take all actions necessary to maximize the use of citations instead of arrests for low-level offenses, particularly in those federal agencies that have substantial contacts with civilians, including Customs and Border Patrol (CBP), Homeland Security, Immigration and Customs Enforcement (ICE), and Interior Department agencies (including Park Police).**
- The absence of meaningful disciplinary systems in law enforcement agencies—including robust rules, unbiased investigations, and swift consequences for violations—breeds a culture of impunity and encourages harmful police practices that disproportionately impact communities of color. **President Biden should issue an executive order (or take other executive action) mandating uniform rules, investigatory practices, and disciplinary consequences across all federal law enforcement agencies.**
- Civilian review boards encourage accountability and community engagement with law enforcement, particularly when those boards are entirely civilian run (with no police membership) and equipped with investigatory powers to respond to misconduct. No federal law enforcement agency has a civilian review board, despite boards’ prevalence at the state and local levels. **President Biden should issue an executive order, or take other executive action, mandating civilian review boards—with appropriate membership, investigatory tools, and authority—for federal law enforcement agencies that have substantial contacts with civilians in local communities, such as the U.S. Park Police.**
- Robust, publicly available misconduct databases build accountability with communities, ensure that agencies meaningfully investigate allegations of misconduct by making those agencies accountable to the public, and prevent officers who have engaged in misconduct from rotating across agencies and departments. **President Biden should issue an executive order, or take other executive action, mandating that federal law enforcement agencies track and document allegations of misconduct in a uniform manner, and that these allegations (whether sustained or not) and investigation**

outcomes—across all types of misconduct (not just use of force)—are maintained in a database for federal, state, and local law enforcement officers.

Fair Housing

- The obligation to affirmatively further fair housing (AFFH) is primarily under the jurisdiction of the Department of Housing & Urban Development (HUD), and it entails both dismantling residential housing segregation and ensuring that segregated communities of color receive the same government investments—in education, public transit, parks and recreation, economic development, and access to health care—that other communities receive. **Thus, HUD should restore its terminated 2015 Affirmatively Furthering Fair Housing rule, which previously governed how the Department exercised oversight over its public sector grantees’ compliance with AFFH.** The recent action by HUD to terminate the AFFH rule essentially ended the requirements of jurisdictions to develop fair housing plans and engage community stakeholders in the development of those plans.
- **HUD should rescind its Disparate Impact rule finalized in September 2020, which gutted a 2013 regulation setting a standard for deciding disparate impact claims under the Fair Housing Act.** This new rule makes it virtually impossible for victims of discrimination to ever bring a successful disparate impact claim because they now have a drastically higher legal burden, and are obligated to preemptively anticipate and debunk potential defenses. Further, this rule would disincentivizes businesses from collecting important data that could reveal discrimination, concealing it from victims and the public.
- **HUD and the Federal Housing Finance Agency should extend a moratorium on evictions and foreclosures for the duration of the pandemic for all properties receiving federal assistance, including public housing, residential properties constructed with federal tax credits, and residential properties financed or underwritten through federal finance programs.**
- **The Centers for Disease Control and Prevention should extend the order halting residential evictions for the duration of the pandemic, and explicitly prohibit evictions for end of lease term (tenant holdover), in addition to failure to pay rent.** Further, tenants should not be required to provide a declaration to their landlord, and the eligibility requirements from 2020 should be simplified.

Education

- **The DOJ and the Department of Education (DOE) should encourage school integration by restoring guidance on the “Voluntary Use of Race to Achieve Diversity and Avoid Racial Isolation in Elementary and Secondary Schools.”**
- **The DOJ and the DOE should support racial diversity in higher education by reissuing guidance on the “Voluntary Use of Race to Achieve Diversity in Postsecondary Education.”** DOJ should also revisit its lawsuit, *United States v. Yale*, as well as its role in other affirmative action cases like *Students for Fair Admissions v. Harvard College*. Likewise, the DOE should reexamine its investigations of affirmative action complaints.
- **The DOE should help create safe, inclusive learning environments for all students by restoring guidance on the “Nondiscriminatory Administration of School Discipline.”**

- **President Biden should rescind Executive Order 13958: Establishing the President’s Advisory 1776 Commission, which seeks to squelch honest, accurate historical accounts of our nation’s disturbing racist past and continuing systemic racism.**

Digital Justice/Privacy

- **FTC should clarify that its “Unfairness Doctrine” prohibits discriminatory data practices and allocate additional resources to enforce the doctrine.** Biased algorithms, unscrupulous actors, and poorly designed technologies can misuse, intentionally or unintentionally, individuals’ personal data in numerous ways, including digital redlining and predatory marketing in employment, housing, lending, education, and insurance, and denial and degradation of service in online public accommodations.
- **President Biden should instruct every agency with anti-discrimination authorities to evaluate how the sector it regulates uses personal data and conduct rulemaking and enforcement as needed to enhance privacy protections and prevent discriminatory uses of personal data within its area of jurisdiction.** This includes but is not limited to: the Department of Justice (DOJ), the Consumer Financial Protection Bureau (CFPB), HUD, the Department of Health & Human Services (HHS), DOE, DOL, the Federal Trade Commission (FTC), Federal Communications Commission (FCC), and the Equal Employment Opportunity Commission (EEOC).
- **DOJ should investigate and enforce against discriminatory uses of personal data in the online economy, intentionally or by disparate impact, such as discriminatory advertising for housing, employment, credit, insurance, or educational opportunities, and discrimination in online public accommodations.** Invasive and predatory commercial data practices have disparate impacts on Black and Hispanic Americans, and low-income people. The misuse of personal data can have devastating effects on access to housing, employment, credit, insurance, or educational opportunities, particularly for Black and Hispanic communities. The DOJ must allocate sufficient resources for enforcement against such discriminatory uses of personal data. The DOJ should also protect the right to equal enjoyment of online public accommodations just as it protects brick-and-mortar public accommodations.

Immigration

- Although approximately 10,000 Liberian Deferred Enforced Departure (DED) holders received a pathway to citizenship through the Liberian Refugee Immigrant Fairness Act, only about 2,000 have been able to submit applications due to overly strict requirements mandating an unexpired Liberian passport or Liberian certificate of naturalization. Liberian passports can only be renewed in Washington, DC, New York, and Minnesota, limiting options for Liberian DED holders in other parts of the country, due to pandemic-related travel restrictions and health concerns. **The Department of Homeland Security should modify these requirements to permit other forms of documentation, such as Liberian birth certificates, and implement other changes to ensure that all Liberian DED holders and eligible family members can safely apply for citizenship during the pandemic. President Biden should also implement any necessary executive action to extend their longstanding DED protection during this period of time.**
- **Rescind President Trump's Executive Order restricting immigration from several African countries: Nigeria, Burma, Eritrea, Kyrgyzstan, Sudan, and Tanzania.**

- **Rescind President Trump's Executive Order restricting immigration from predominantly Muslim countries (known as the "Muslim Ban").**

ENFORCEMENT ACTION

During the past four years, the U.S. Constitution and many core civil rights laws were dramatically under-enforced by the federal government, and the Department of Justice took some positions that were hostile or antithetical to basic civil and human rights. President Biden should prioritize a comprehensive assessment of the current status of enforcement of all civil rights statutes, rules and regulations, and policies by each agency in the Administration. Based on this assessment, the agencies should return to their historic mission of enforcing civil rights across the country, particularly the Civil Rights Act, the Voting Rights Act, the National Voter Registration Act, the Help America Vote Act, the Fair Housing Act, the Equal Credit Opportunity Act, and the Matthew Shepard and James Byrd Jr. Hate Crimes Prevention Act.

LEGISLATION

COVID-19 Cross-Cutting Priorities

- **Congress must immediately pass another comprehensive COVID-19 relief bill, which extends at least through 2021, or through when vaccines are widely and equitably available and distributed throughout the nation, including in smaller and more rural communities.** This legislation should include language: 1) requiring federal contractors responding to COVID-19 to undertake affirmative action to employ African Americans and members of other underrepresented groups; and 2) prohibiting discrimination by recipients of federal funds on any basis, including race, color, national origin, age, disability, religion, sex, sexual orientation, and gender identity. The new COVID-19 relief package should:
 - Provide additional funding for direct cash assistance to low-income Americans and expand access to TANF and unemployment assistance during the entire period of the pandemic;
 - Increase funding and the benefits available through the Supplemental Nutrition Assistance Program (SNAP);
 - Increase funding for hospitals and care centers providing COVID-19 treatment to communities of color and low-income communities;
 - Mandate disclosure of COVID-19 data on testing, positive cases, and case outcomes by race and ethnicity to eliminate racial disparities in COVID-19 cases and outcomes;
 - Incentivize the remaining states to expand Medicaid access, and ensure that COVID-19 treatment is fully covered for newly-eligible people in those states;
 - Provide a 12-month national moratorium on evictions and foreclosures and allocate \$100 billion in rental assistance;
 - Allocate sufficient funding to state and federal prisons, jails, and detention centers to adequately test and treat staff and inmates for COVID-19, and take necessary precaution to minimize the virus' spread in correctional facilities;
 - Allocate funding to local courts for the suspension of fines and fees and incentivizing the waiver of cash bail for individuals awaiting trial for

misdeemeanors and non-violent felony charges, so that people are not incarcerated and exposed to COVID-19 due to poverty or unemployment;

- Allocate funding to ensure K-12 students have adequate technology to access distance-learning curricula and other necessary supports, and funding to extend universal broadband access;
- Extend federal student borrower relief under the CARES Act through at least the first 6-9 months of 2021, while the pandemic is ongoing, and ensure that all federal borrowers are eligible;
- Extend access to emergency sick leave and paid family and medical leave, which is expiring under the CARES Act;
- Ensure that any additional Paycheck Protection Program (PPP) funds are prioritized for the smallest businesses, and those businesses most negatively impacted by the pandemic, particularly businesses owned by women and people of color (without any restrictions due to a past criminal conviction);
- Safeguard essential workers by requiring the DOL to create an emergency temporary standard to protect against occupational exposure to COVID-19;
- Provide privacy protections for people using COVID-19 tracking technologies, requiring that it: (1) is voluntary; (2) is tested for efficacy and safety before being deployed; (3) does not unfairly discriminate; and (4) does not allow private health data to be used for secondary purposes or shared with law enforcement; and
- Protect and adequately fund the United States Postal Service.

Voting Rights and Democracy

- **Enact the John Lewis Voting Rights Advancement Act.** Since the *Shelby County v. Holder* decision, the precious right to vote has been threatened—and denied—for millions of Americans due to discriminatory laws that have gone into effect in jurisdictions with a sordid history of voting discrimination. The John Lewis Voting Rights Advancement Act would restore the Section 5 preclearance process that was struck down in *Shelby County*, ensuring that discriminatory laws and policies are blocked from taking effect. The Voting Rights Advancement Act would modernize the current Voting Rights Act and restore the vital preclearance process for states and localities with recent records of discrimination in voting.
- **Enact H.R. 1, also known as the For the People Act.** Our democracy is currently threatened by strict voter suppression laws that disproportionately affect communities of color, foreign interference in our elections, money that overpowers the voices of the people, and increased government secrecy. H.R. 1. addresses voter access, voting registration, election integrity, election security, political spending, and ethics for the three branches of government. The bill sets forth provisions that expand access to the ballot box, end partisan gerrymandering, and protect American elections from interference from foreign entities. The bill strengthens federal ethics oversight and increases accountability by requiring presidential candidates to disclose their tax returns.
- **Enact legislation to ensure that people with criminal convictions can vote in federal elections.** Currently, 47 states deny the right to vote to people due to a criminal conviction, with some prohibiting incarcerated people from voting, others extending that restriction to parole and probation, and a handful restrict the right to vote even after a person has completed all of the terms of their sentence. The right to vote is a

fundamental part of our democracy—nobody should be denied the right to it, regardless of a criminal conviction.

Economic Justice & Employee Rights

- **Enact the Forced Arbitration Injustice Repeal (FAIR) Act, which would end forced arbitration and class action waivers.** Many people and consumers across the country enter arbitration agreements that prevent them from suing companies for sexual harassment, discrimination, and other workplace-related complaints. Without protections from mandatory arbitration, it is estimated that 60 million people are currently suppressed from vindicating their rights in court by arbitration agreements. This bill prohibits a pre-dispute arbitration agreement from being valid or enforceable if it requires arbitration of an employment, consumer, antitrust, or civil rights dispute.
- **Enact legislation to strengthen Section 1981 of the Civil Rights Act of 1866.** Section 1981 of the Civil Rights Act of 1866 is a federal law prohibiting discrimination on the basis of race, color, and ethnicity when making and enforcing contracts. However, Section 1981 is relatively limited in scope, and the Court’s prior rulings have put an unnecessarily high burden on plaintiffs. In *Comcast v. National Association of African-American Owned Media*, the Supreme Court ruled in favor of Comcast after Byron Allen brought a racial discrimination suit, alleging Comcast discriminated against him when it refused to carry channels operated by his television network. The Court upheld a high bar for bringing suits under the Civil Rights Act of 1866, requiring the plaintiff to show “but for” causation—meaning that the defendant would have made a different contracting decision were it not for the plaintiff’s race. Strengthening the scope and language of Section 1981 would better protect rights and ensure a fairer standard for plaintiffs.

Racial Health Disparities

- **Enact legislation like the Anti-Racism in Public Health Act to confront the public health impacts of structural racism.** Black communities and other communities of color have experienced years of structural racism, resulting in deep inequalities in the public health system. Unfortunately, the extent of these inequalities is not well known without a federal initiative to conduct comprehensive, race-conscious research and address disparities. The Anti-Racism in Public Health Act confronts the public health impacts of structural racism by creating a “National Center for Anti-Racism” at the Centers for Disease Control and Prevention (CDC) and a law enforcement violence prevention program within the CDC’s National Center for Injury Prevention and Control.
- **Enact legislation like the Maternal Health Pandemic Response Act to address the disproportionate rates of maternal mortality deaths among Black women.** Funding must be allocated to hospitals for training programs that increase access to culturally competent medical care for people of color and for improving positive health outcomes in maternal and infant care, as Black women and other women of color face significantly higher rates of maternal and infant mortality.

Criminal Justice Reform

- **Enact the George Floyd Justice in Policing Act.** After years of entrenched racial discrimination in policing across the country, and the deaths of George Floyd, Breonna Taylor, Elijah McClain, and many, many other Black people, the George Floyd Justice in

Policing Act is the most comprehensive bill to address a wide range of issues relating to police misconduct, accountability, and transparency. Specifically, this bill would accomplish the following: (a) establish limits on qualified immunity, (b) facilitate federal enforcement actions against police officers who use excessive force, (c) create a national registry to increase transparency, and (d) establish new requirements (e.g. the use of body-worn cameras) to regulate police officers and departments, among other things.

- **Enact the Marijuana Opportunity Reinvestment and Expungement Act.** The movement to legalize and decriminalize marijuana across the country must not leave behind those who have been deeply harmed by prior criminalization. The Marijuana Opportunity Reinvestment and Expungement (MORE) Act goes beyond mere decriminalization. The MORE Act would remove marijuana from the schedules of controlled substances. It also establishes funds and grant programs aimed at helping people, specifically people of color, who have been disparately impacted by the War on Drugs. Lastly, if enacted, this bill would expunge any federal cannabis offense convictions and arrests.

Fair Housing

- **Enact legislation to expand the protections of the Fair Housing Act to prohibit discrimination on the basis of sexual orientation, gender identity, marital status, and source of income.** Currently, only 22 states explicitly prohibit housing discrimination based on sexual orientation and gender identity. It is essential that protections of the Fair Housing Act extend to prohibiting discrimination on the basis of sexual orientation, gender identity, marital status, and source of income in order to ensure equitable access to housing and lending across the country, and for people in different types of housing.

Stopping Hate Crimes

- **Enact the Jabara-Heyer Act and improve hate crime data reporting infrastructure.** The United States has experienced an increase in the number of hate crimes across the country, with 7,314 reported hate incidents in 2019 in comparison to 5,796 in 2012. Although hate crimes seem to be on the rise, these numbers seldom paint a full picture of all hate crimes due to a large gap in data collection from law enforcement. The Jabara-Heyer Act would provide grants for state and local government to assist in implementing a National Incident-Based Reporting System and state-run hate crime hotlines.
- **Enact the Emmett Till Antilynching Act.** Currently, the United States does not have any federal law in place against lynching. Named after Emmett Till, the Emmett Till Antilynching Act would establish a new criminal civil rights violation for lynching and conspiracy to commit a lynching. In other words, this bill would make lynching a federal crime. Congress must enact the Emmett Till Antilynching act as a way to confront this country's long history of racial discrimination and race-based violence.

Education

- **Congress should provide robust financial aid and free college for socioeconomically disadvantaged students. Higher education is now more expensive than ever before, making it harder for low-income students to obtain a college degree. Congress must make college education more affordable by enacting legislation like the College**

Affordability Act (H.R. 4674), and devising new programs to waive tuition costs for socioeconomically disadvantaged students.

- **Enact legislation to support greater racial diversity in our schools, like the Strength in Diversity Act (H.R. 2639).** Schools today are far more racially segregated than just twenty years ago. School districts seeking innovative and lawful ways to integrate their schools need support with grants like those in H.R. 2639 to help ensure that all children learn together and reap the tremendous benefits of racially diverse schools.
- **Enact legislation to create a stronger pipeline for teachers and school leaders of color, such as the Teacher Diversity and Retention Act (H.R. 4288).** Today, teachers of color account for only one out of every five school teachers, while students of color constitute more than one out of every two students in public schools. H.R. 4288 can help develop a stronger pipeline for people of color into teaching and principal positions.
- **Enact legislation that encourages schools to provide better supports to maintain safer, less discriminatory learning environments for students of color, such as the Counseling Not Criminalization in Schools Act.**

Digital Justice/Privacy

- **Enact comprehensive privacy legislation that prioritizes civil rights and prohibits discriminatory uses of personal data.** As the Internet has evolved into our public square, marketplace, employment agency, bank, library, and theater, it is imperative that discrimination be outlawed in the data economy just as discrimination was outlawed in the brick-and-mortar economy. The Lawyers' Committee put forth a model privacy bill that bans the use of individuals' personal information for harmful, discriminatory purposes. The bill prohibits companies from using individuals' personal information to discriminate in housing, employment, credit, education, insurance, or online public accommodations; requires companies to protect and secure the personal information they hold; requires companies to disclose more data about their practices and to use easy to read short-form notices provided directly to consumers; ensures companies collect only the information they need from consumers in order to provide the requested services; establishes procedures for algorithmic bias assessments; enables State Attorneys General to bring action against companies that violate privacy rights; and grants individuals a private right of action empowering them to defend their own privacy rights.
- **Enact legislation to reform Section 230 of the Communications Decency Act to level the playing field and hold major technology companies accountable to the same civil rights and anti-discrimination standards as their brick-and-mortar competitors.** The original goal of Section 230 was to provide companies with protection from becoming legally liable for their users' content if they opted to moderate it. It is an important law foundational to an open Internet, but it has flaws. The law has absolved tech companies of all responsibility with impunity, allowing big tech companies to avoid liability for discriminatory practices. Congress must enact reforms to the Communications Decency Act Section 230 that ensure that online businesses comply with civil rights laws and are accountable when they are paid to deliver advertisements and other promotional content.