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REPLY TO FLORIDA

June 8, 2026

Via Email Only

Office of the General Counsel
Los Angeles Unified School District
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RE: LAUSD's Mandatory LGBTQ+Cultural Training Certification

Dear General Counsel Devora Navera Reed:

Liberty Counsel is a national nonprofit litigation, education, and public policy organization with an emphasis on First Amendment liberties. We write on behalf of Christian educators at LAUSD who wish to exempt themselves from LAUSD's mandatory LGBTQ+Cultural Training Certification, which requires they "affirm" and "respect" the identifies of all students, including those who identify as LGBTQ+.

The District's position regarding the mandatory training certification raises serious concerns under Title VII of the Civil Rights Act of 1964. Title VII requires public employers to reasonably accommodate an employee's sincerely held religious beliefs, practices, and observances unless the employer can demonstrate that granting the accommodation would impose an undue hardship on the conduct of its business.

Several LAUSD educators hold traditional religious beliefs regarding sexuality, marriage, and God's design for humankind. A mandatory certification that requires affirmation of views contrary to those beliefs directly conflicts with their sincerely held religious convictions. Federal law protects employees from being compelled to choose between their employment and adherence to their faith.

The Supreme Court has made clear that an employer seeking to deny a religious accommodation must demonstrate that the requested accommodation would result in a

substantial increased cost in relation to the conduct of its particular business. *See Groff v. DeJoy*, 600 U.S. 447 (2023). Mere speculation, administrative inconvenience, disagreement with an employee's religious beliefs, or generalized concerns about workplace operations are insufficient to establish undue hardship. The District cannot meet this burden merely by asserting a preference for uniform compliance with the certification requirement or by claiming that granting accommodations would undermine its policy objectives.

Indeed, allowing employees to request exemptions from the certification requirement based upon sincerely held religious beliefs would impose little, if any, burden on the District. Public employers across the country routinely evaluate and grant religious accommodations in compliance with Title VII. The District therefore lacks a lawful basis to categorically refuse accommodation requests from teachers and other employees whose religious beliefs prevent them from completing or affirming the mandatory certification.

LAUSD is currently requiring teachers to complete the mandatory LGBTQ training and accompanying certification. A refusal to complete the training by the end of the school year may affect their future employment. Time is therefore of the essence.

Liberty Counsel respectfully requests written confirmation **no later than June 12, 2026** that the District will accept and fairly consider requests for religious accommodation from the mandatory certification requirement based upon sincerely held religious beliefs, consistent with the requirements of Title VII. Absent such confirmation, affected employees will be forced to consider all available legal remedies to protect their federally protected rights.

