



July 15, 2026

The Honorable Bill Cassidy, M.D., Chairman
The Honorable Bernie Sanders, Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate
Washington, DC 20510

Dear Chairman Cassidy and Ranking Member Sanders:

On behalf of the International Franchise Association (IFA) and the more than 830,000 franchise establishments across nearly 300 industries that our members represent—businesses that support nearly 8.9 million American jobs, generate more than \$920 billion in annual economic output, and account for nearly 3 percent of U.S. gross domestic product—I write in strong support of the nomination of Keith E. Sonderling to serve as Secretary of Labor. IFA is the world's oldest and largest organization representing franchising, and the franchise community it serves—the brands, the local franchise small business owners who invest in them, and the millions of Americans they employ—would be exceptionally well served by Mr. Sonderling's confirmation. Throughout a career spanning three Administrations and multiple agencies, he has demonstrated a consistent, informed, and balanced commitment to the workers, employers, and small businesses that the Department of Labor exists to serve.

Mr. Sonderling brings to the office a depth of experience with the Department and with the practical realities of franchised businesses that are unmatched. As Deputy Administrator and Acting Administrator of the Wage and Hour Division from 2017 to 2020, he restored the Department's opinion letter program, expanded compliance assistance and educational outreach, and championed voluntary-compliance initiatives that gave small business owners, including franchisees, the clarity and certainty they need to operate, hire, and grow. His subsequent service as a Senate-confirmed Commissioner and Vice Chair of the Equal Employment Opportunity Commission, and then as Deputy Secretary and Chief Operating Officer of the Department, has given him command of both the Department's day-to-day operations and the substantive law that governs the American workplace. Across each of these roles, he has understood and respected a distinction that is fundamental to franchising: that the brand standards and quality-control requirements a franchisor maintains to protect its trademark and its customers are categorically different from the direct, day-to-day control over employment that defines an employer.

That understanding is not merely theoretical. Most recently, under Mr. Sonderling's leadership as Acting Secretary, the Department advanced a proposed joint employer rule that expressly acknowledges the franchise model—recognizing that the franchise relationship does not, by itself, create joint employment, and that the ordinary brand and quality-control standards a franchisor maintains do not, standing alone, establish joint employer status. IFA publicly commended that balanced, precedent-grounded approach, which protects the independence of local franchise owners while strengthening protections for workers. It is characteristic of the leadership Mr. Sonderling would bring to the Department: steady, informed, and attentive to the small businesses that federal labor policy so directly affects. Franchising is, at its core, a proven pathway to small-business ownership and upward mobility, and he has consistently shown that he understands its value to the workers and communities the Department serves.



For these reasons, IFA urges the Committee to advance Mr. Sonderling's nomination and the full Senate to confirm him without delay. We believe his leadership would promote clear, workable labor policy that protects workers, supports small businesses, and respects the franchise model. We would welcome the opportunity to serve as a resource to the Committee throughout this process, and we thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mike Layman', is positioned above the typed name.

Michael Layman
Chief Advocacy Officer
International Franchise Association