

# Sisters of St. Dominic

---

5635 Erie Street  
Racine, WI 53402-1900  
www.racinedominicans.org  
(262) 639-4100  
(262) 639-9702 fax

July 28, 2020

\*\*\* Submitted online at [www.regulations.gov](http://www.regulations.gov) \*\*\*

Office of Regulations & Interpretations  
Employee Benefits Security Administration, Room N-5655  
U.S. Department of Labor  
200 Constitution Avenue N.W.  
Washington, DC 20210

Re: RIN 1210-AB95 Financial Factors in Selecting Plan Investments

Dear Assistant Secretary Wilson:

Sisters of St. Dominic is the civil corporation that manages the business affairs for a Catholic order of women religious, most commonly known as the Racine Dominicans. The Racine Dominicans guiding mission is simplified as "committed to truth and compelled to justice." The Racine Dominicans strive to honor their commitment to truth and justice, both locally and globally, through mission work, sponsored ministries, education, and numerous other services and initiatives.

Our organization believes in the maintaining a diversified portfolio, including companies that demonstrate a strong commitment to environmental, social, and governance ("ESG") principles. We believe that ESG guidelines and practices are fundamental to shareholder value and comprise a key component of our investment strategy. Therefore, we are writing to express our vehement opposition to the changes being considered by the Department of Labor as well as to express our concern about the additional burdens these changes would create for fiduciaries in their consideration of ESG factors.

When making your decision, we ask that you consider the following about the proposed rule: there is no evidence to support that fiduciaries are choosing ESG investments based on prohibited factors; that research shows a positive correlation between ESG considerations and financial performance; and the definition of that is included in the proposed rule of when ESG factors are considered non-financial is very limited.

For the above reasons, we strongly urge the Council of Environmental Quality to reconsider the proposed revisions.

Sincerely,



Sharon A. Geertsen  
Chief Financial Officer

Cc: Alex Ostrov, Accounting Manager, Sisters of St. Dominic