March 20, 2020

By Electronic Submission

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20520

Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

Commodity Futures Trading Commission
1155 21st Street, NW
Washington, DC 20581

Small Business Administration
409 3rd Street, SW
Washington, DC 20416

Office of the Comptroller of the Currency
400 7th Street, SW
Washington, DC 20219

Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Office of Information and Regulatory Affairs
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Re: Request for 90-Day Tolling (Extension) of Public Comment Periods During the COVID-19 Pandemic

Dear Madam or Sir:

The emerging COVID-19 pandemic poses substantial threats to public health, imperils the health and life of many people in the United States, and significantly disrupts daily life, impacts that will likely persist for months. The undersigned organizations respectfully request an across-the-board extension (tolling) of public comment periods for a minimum of 90 days for all pending requests for information, notices under the Paperwork Reduction Act, notices of proposed rulemaking, and other releases seeking meaningful public comment. In addition, we request a public comment period of no less than 90 days for any such releases issued in the next three months. This request does not include items needed to respond to the crisis at hand.

Today, we are in a dramatically different world than when the agencies issued (or prepared to issue) these requests for public notice and comment. It is becoming increasingly obvious that additional time is needed to guarantee transparent and fair rulemaking processes with the meaningful public input that makes for regulatory actions that effectively and fairly accomplish statutory goals.

Effective and fair rules and other regulatory actions emerge from extensive engagement with the broad and diverse public impacted by the proposals. However, the spread of the dangerous COVID-19 and the unprecedented cautionary measures we are all taking to protect our families and communities have caused major unexpected disruptions in our lives and organizations. These disruptions present challenges to providing meaningful input within the current timeframes. We are aware that agencies
as well are grappling with the impacts of COVID-19 and may also need additional time to gather and process public input.

Additionally, the COVID-19 emergency has also had ripple effects throughout the financial system and has likely put the economy on a recessionary path. We are in a dramatically different economy than we were even a few weeks ago. Our organizations are focusing resources on policies and activities that would mitigate the impact of the unfolding financial and economic crisis, and this leaves little capacity for crafting appropriate comments on complex regulatory proposals that are not immediately relevant to the crisis.

For these reasons the undersigned organizations are requesting that all regulators publish a formal extension of no less than 90 days for any request for public comment closing its comment period in the next 90 days, with the exception of any rules necessary to respond to people's needs in this crisis or meet statutory deadlines. These timelines should be reevaluated as needed as the situation develops.

Thank you in advance for your consideration of this request; a prompt response will be appreciated as an aid to planning in a demanding time period.

Alaska PIRG
Allied Progress
American Federation of State, County and Municipal Employees (AFSCME)
Americans for Financial Reform Education Fund
Association for Neighborhood and Housing Development (ANHD)
Beneficial State Foundation
Better Markets
Center for American Progress
Center for Community Progress
Center for NYC Neighborhoods
Coalition on Human Needs
Community Legal Services (Philadelphia, PA)
Connecticut Fair Housing Center
Consumer Action
Consumer Federation of America
Democratic Treasurers Association
Earth Ethics, Inc
Economic Policy Institute
Empire Justice Center
Financial Accountability and Corporate Transparency (FACT) Coalition
Greenpeace USA
Hope Enterprise Corporation
Institute for Agriculture and Trade Policy

Interfaith Center on Corporate Responsibility
International Brotherhood of Teamsters
Main Street Alliance
Massachusetts Communities Action Network
Montana Organizing Project
NAACP
National Association of Consumer Advocates
National Community Reinvestment Coalition (NCRC)
National Community Stabilization Trust
National Consumer Law Center (on behalf of its low income clients)
National Fair Housing Alliance
National Housing Resource Center
National Urban League
New Jersey Citizen Action
New York Housing Conference
Oxfam America
Public Citizen
SC Appleseed Legal Justice Center
Take on Wall Street
350 Butte County
U.S. PIRG
Veterans Education Success
Virginia Organizing
Woodstock Institute