

March 24, 2020

By Electronic Submission

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

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

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

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

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

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

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

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

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

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

Re: Request to suspend all non-COVID-19 rulemaking during the public health emergency

Dear Madam or Sir:

As part of the executive branch response to the dangerous COVID-19 health emergency, the undersigned organizations respectfully urge federal agencies to place a moratorium on any pending, upcoming, or new regulatory rulemaking that is not directly responsive to the current COVID-19 pandemic, until at least 30 days after the national emergency has been lifted.

We are requesting a temporary suspension of all federal rulemaking and regulatory actions including requests for information, notices under the Paperwork Reduction Act, notices of proposed rulemaking, advance notices of proposed rulemaking, ongoing development of potential regulations, or issuing final rules, and any other such releases except any agency actions directly related to COVID-19, the health and safety of the U.S. population, or the financial and economic collateral damage of the health crisis (as well as rulemaking to extend statutory or regulatory deadlines during this period, until after the crisis as necessary).

We do not know when the current emergency might end; when the emergency is lifted, there will need to be an appropriately incremental and deliberative process to resume the halted regulatory processes that recognizes that the lifting of the emergency declaration will not result in an immediate return to pre-emergency conditions and allows for meaningful public input under still stressed conditions.

Every federal agency must dedicate all regulatory resources to addressing COVID-19 and the enforcement of rules meant to protect public health, consumers, investors and retirees, and the

integrity and stability of the markets. The pursuit of any non-crisis-related rulemaking would be a misallocation of limited resources that distracts needed focus from U.S. public health and welfare, and financial stability. This is especially crucial because the crisis means that agency capacity and resources will themselves be unusually limited. When agencies resume their rulemaking process, they must take into account the need to incorporate the new circumstances and reassess the necessity and relevancy of their pending or planned policies even for rulemakings that were already far advanced before the crisis.

Transparency and fairness require allowing for meaningful engagement by the broad and diverse constituencies impacted by proposed rules and other regulatory actions. That simply will not be possible during the current health crisis and the economic crisis it is expected to spawn, and the administrative record will lack the breadth of expert and stakeholder public submissions necessary to formulate rules and policies that effectively and fairly accomplish statutory goals.

Thank you in advance for your consideration of this request.

Alabama Appleseed Center for Law and Justice
Alaska PIRG
Americans for Financial Reform Education Fund
Association for Neighborhood and Housing Development (ANHD)
Beneficial State Foundation
Better Markets
California Reinvestment Coalition
Center for Community Progress
Center for Digital Democracy
Center for NYC Neighborhoods
Center for Popular Democracy
Delaware Community Reinvestment Action Council, Inc.
Earth Democracy Campaign, WILPF-US
Economic Policy Institute
Empire Justice Center
Greenpeace USA
Hope Enterprise Corporation (Jackson, MS)
Housing Clinic, Jerome N. Frank Legal Services Organization, Yale Law School
Missouri Faith Voices
Mountain State Justice
National Association of Consumer Advocates
National Community Stabilization Trust
National Consumer Law Center (on behalf of its low income clients)

National Fair Housing Alliance
National Housing Resource Center
NETWORK Lobby for Catholic Social Justice
New Jersey Citizen Action
New York Housing Conference
Northwest Atlantic Marine Alliance
Ozarks Citizens Alliance
People's Action
Pesticide Action Network North America
Proposition One Campaign for a Nuclear-Free Future
Public Citizen
Revolving Door Project
S.C. Appleseed Legal Justice Center
Seeding Sovereignty
Strong Economy For All Coalition
Take on Wall Street
350 Butte County
350 PDX
Texas Appleseed
Tzedek DC
UnidosUS; formerly NCLR
Virginia Organizing
Women's International League for Peace and Freedom US
Woodstock Institute