

March 24, 2020

By Electronic Submission

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

Office of the Comptroller of the Currency  
400 7<sup>th</sup> Street, SW  
Washington, DC 20219

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

Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

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

Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW  
Washington, DC 20410

Commodity Futures Trading Commission  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

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

Small Business Administration  
409 3<sup>rd</sup> Street, SW  
Washington, DC 20416

Office of Information and Regulatory Affairs  
The Office of Management and Budget  
725 17<sup>th</sup> 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