April 1, 2020

Dr. Benjamin Carson
Secretary
Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

Russell Vought
Acting Director
Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: Extension of Public Comments Amid COVID-19 Pandemic

Dear Secretary Carson and Acting Director Vought:

We, the undersigned 45 organizations, request the Department of Housing and Urban Development and the Office of Management and Budget temporarily suspend the rulemaking process for the Notice of Proposed Rulemaking, “Equal Participation of Faith-Based Organizations in HUD Programs and Activities: Implementation of Executive Order 13831” in light of the COVID-19 pandemic. We request a pause in this rulemaking process for as long as the President’s March 13, 2020 Declaration of a National Emergency concerning the COVID-19 pandemic remains in effect.

The proposed rule would make changes to the existing regulations that govern the partnerships between the government and faith-based social service providers. The regulations affect not only faith-based entities providing social services and state and local governments, but also the people in our communities seeking these critical services. The rights of beneficiaries should not be drastically changed without a meaningful opportunity for these key stakeholders to offer public comment.

The COVID-19 pandemic has ushered in a time of uncertainty for all of us. As communities like religious and civil society organizations, state and local policymakers, advocacy organizations, and the general public deal with increasing concerns over health and safety, their ability to provide comment to a proposed rule like this one are greatly decreased. Pausing the active public comment period will allow these stakeholders to address these concerns and give them the opportunity to return to full capacity so that they will be able to effectively weigh in on this proposed rule.

We know that federal agencies value the insight that a public comment period provides and would not want to curtail individuals’ and organizations’ ability to provide that input. That’s why associations that represent our nation’s states, cities, and counties, and 170 public interest, labor, and grassroots organizations representing millions of Americans have also requested temporary suspension in federal agencies’ active comment periods due to the COVID-19 pandemic. Accordingly, we ask that you temporarily suspend the rulemaking process on this proposed rule.

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1 Letter from the National Governors Association and Others to President Donald J. Trump (Mar. 20, 2020).
Thank you for your consideration.

Sincerely,

American Atheists
American Humanist Association
Americans United for Separation of Church and State
Anti-Defamation League
The Arc of the United States
Autistic Self Advocacy Network
Center for American Progress
Center For Inquiry
CenterLink
The Consortium for Citizens with Disabilities Housing Task Force
Baptist Joint Committee for Religious Liberty (BJC)
Disciples Center for Public Witness
Disciples Justice Action Network
Equal Partners in Faith
Equality California
Family Equality
FORGE, Inc.
Freedom From Religion Foundation
Hindu American Foundation
Human Rights Campaign
Interfaith Alliance
The Jewish Federations of North America
Lambda Legal
The Leadership Conference on Civil and Human Rights
Los Angeles LGBT Center
Methodist Federation for Social Action
Movement Advancement Project
NAACP
NARAL Pro-Choice America
National Center for Lesbian Rights
National Center for Transgender Equality
National Council of Jewish Women
National Equality Action Team
National LGBTQ Task Force Action Fund
National Low Income Housing Coalition
National Organization for Women
National Women's Law Center
People For the American Way
Secular Coalition for America
Secular Policy Institute
Silver State Equality-Nevada
The Trevor Project
True Colors United
Union for Reform Judaism
The United Methodist Church - General Board of Church and Society