

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,<sup>1</sup> and 170 public interest, labor, and grassroots organizations representing millions of Americans<sup>2</sup> 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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<sup>1</sup> [Letter from the National Governors Association and Others to President Donald J. Trump](#) (Mar. 20, 2020).

<sup>2</sup> [Letter from 170 Public Interest, Labor, and Grassroots Organizations to the U.S. Office of Management and Budget](#) (Mar. 19, 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