

April 8, 2020

Russell T. Vought
Acting Director
U.S. Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

Re: Extension of Public Comment Period for Request for Comment on Considerations for Additional Measures of Poverty (OMB-2019-0007) Amid COVID-19 Pandemic

Dear Acting Director Vought:

In light of the current COVID-19 pandemic and the President's March 13, 2020 Declaration of a National Emergency the Novel Coronavirus Disease (COVID-19) Outbreak, the undersigned organizations that serve and advocate for and with people experiencing poverty urge the Office of Management and Budget (OMB) to extend the comment period for the Request for Comment on Considerations for Additional Measures of Poverty (OMB-2019-0007-0001) for the length of the national emergency, plus a reasonable period of at least 30 days.

The Request for Comment requests responses to 14 technical questions posed by the Interagency Technical Working Group on Evaluating Alternative Measures of Poverty (Working Group). The questions range from identifying the value of health insurance and education to subtracting expenses from income to creating a potential consumption resource measure to establishing and updating thresholds. Defining poverty accurately is critical but not easy. Our organizations, plus other academic experts, anti-poverty organizations, state and local governments, and other members of the public need a meaningful opportunity to submit comments to the Working Group. This meaningful opportunity is not possible within the current April 14 comment deadline given the COVID-19 crisis.

So far, there are at least 374,329 COVID-19 cases reported in the United States and 12,064 deaths.¹ Universities had to quickly shift to online classes to prevent the spread, and many academic experts have been unable to focus on answering the questions posed because of the time spent moving their classes online and helping meet the needs of their students and institutions resulting from this crisis. Moreover, our organizations, in addition to other academics, anti-poverty organizations, and state and local officials, need to focus on identifying and advocating for measures responsive to the health and economic impacts of the COVID-19 crisis on families with the lowest incomes.

¹ U.S. DEP'T OF HEALTH & HUMAN SERVS., CTRS. FOR DISEASE CONTROL AND PREVENTION, Cases in U.S. <https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html> (last updated April 7, 2020). Johns Hopkins University & Medicine reports 401,116 cases and 12,936 deaths. Johns Hopkins University & Medicine, Coronavirus COVID-19 Global Cases, <https://coronavirus.jhu.edu/map.html> (last accessed April 8, 2020).

Associations representing U.S. states, cities, and counties, as well as 14 House Committee Chairs, have requested extensions of all active federal agency comment periods for rulemaking and non-rulemaking because of the COVID-19 national emergency.² For the reasons stated above, we urge OMB to extend the deadline for this Request for Comment until the pandemic emergency ends, plus at least 30 days.

Thank you for your attention to this critical matter.

Sincerely,

African American Health Alliance
Alliance for Retired Americans
American Academy of Social Work and Social Welfare
American Kidney Fund
Asian & Pacific Islander American Health Forum
Center for American Progress
Center for Disability Rights
Center for Economic and Policy Research
Center for Law and Social Policy (CLASP)
Center for the Study of Social Policy
CenterLink: The Community of LGBT Centers
Children's Aid
Children's Defense Fund
Children's Defense Fund - New York
Coalition of Labor Union Women
Coalition on Human Needs
Constitutional Accountability Center
Council on Social Work Education
DC Coalition Against Domestic Violence
D.C. Hunger Solutions
Equality California
Equality North Carolina
Federation of Protestant Welfare Agencies (FPWA)
First Focus on Children
Food Research & Action Center
Georgetown Center on Poverty and Inequality
Girls Inc.

² Letter from the National Governors Association et al. to President Donald J. Trump (Mar. 20, 2020), <https://www.nga.org/letters-nga/state-and-local-government-organizations-seek-pause-on-public-comments-on-rulemaking-processes/>; Letter from Frank Pallone, Jr., Chairman of the House Comm. on Energy and Commerce et al. to Russell Vought, Acting Director, Office of Management and Budget (Apr. 1, 2020), <https://edlabor.house.gov/imo/media/doc/Committee%20Chairs%20Letter%20re%20Comment%20Period%20Extension.pdf>.

GLBTQ Legal Advocates & Defenders (GLAD)
Hunger Free America
Indivisible
Justice in Aging
Kairos Center for Religions, Rights and Social Justice
MANA, A National Latina Organization
MAZON: A Jewish Response to Hunger
Muslim Public Affairs Council (MPAC)
NAACP
National Association of Social Workers
National Association of Social Workers - Maryland Chapter
National Center for Lesbian Rights
National Center for Transgender Equality
National Coalition for the Homeless
National Council of Jewish Women
National Disability Rights Network
National Education Association
National Employment Law Project
National Employment Lawyers Association
National Equality Action Team
National Health Care for the Homeless Council
National Health Law Program
National Human Services Assembly
National LGBTQ Task Force
National Organization for Women
National Partnership for Women & Families
National Resource Center on Domestic Violence
National Senior Corps Association
National WIC Association
National Women's Law Center
NETWORK Lobby for Catholic Social Justice
Network of Jewish Human Service Agencies
Partnership for America's Children
PFLAG National
Planned Parenthood Federation of America
Policy Matters Ohio
Positive Women's Network-USA
Pride at Work
Public Advocacy for Kids (PAK)
RESULTS
Silver State Equality-Nevada
SPLC Action Fund
Tahirih Justice Center
The Arc of the United States
The Employee Rights Advocacy Institute For Law & Policy
The Gerontological Society of America

The Jewish Federations of North America
The Leadership Conference on Civil and Human Rights
Ujima Inc: The National Center on Violence Against Women in the Black Community
Union for Reform Judaism
We All Rise
Women's Institute for a Secure Retirement (WISER)
ZERO TO THREE