April 3, 2020

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


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 73 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 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 239,279 COVID-19 cases reported in the United States and 5,443 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.

Associations representing U.S. states, cities, and counties 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 Kidney Fund
Asian & Pacific Islander American Health Forum
Center for American Progress
Center for Disability Rights
Center for Economic and Policy Research
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
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.
GLBTQ Legal Advocates & Defenders (GLAD)
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 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 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 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