

Comment from Public Member Sidney A. Shapiro  
November 5, 2020

While I like the direction the committee is going, the idea of alternative means of seeking input has essentially disappeared. I assume it was watered down into "Agencies should consider seeking public input on rules on rulemakings (whether through notice and comment **or some other mechanism**), whether or not they are required to do so under the Administrative Procedure Act (5 U.S.C. § 553)." I don't have the language from the previous draft, but it was more specific because it talked about reaching out to communities that do not normally participate.

I would therefore propose: "Agencies should consider seeking public input on rules on rulemakings (whether through notice and comment **or some other mechanism which enables participation by marginalized communities affected by a proposed rule**), whether or not they are required to do so under the Administrative Procedure Act (5 U.S.C. § 553)."

Thanks, Sid