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