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The Crane Institute of Sustainability, Inc.  
home to the Intentional Endowments Network

Office of Regulations and Interpretations  
Employee Benefits Security Administration  
Room N-5655  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Re: Financial Factors in Selecting Plan Investments Proposed Regulation (RIN 1210-AB95)

Dear Director Canary:

On behalf of The Crane Institute of Sustainability, we are writing to **request an extension of the comment period from 30 days to 90 days** for public comments on the notice of proposed rulemaking entitled “Financial Factors in Selecting Plan Investments” (“Proposal”). The Employee Benefits Security Administration (“EBSA”) announced its proposed regulation on June 23, 2020.

The Crane Institute of Sustainability coordinates the Intentional Endowments Network (IEN), a nonprofit, peer-learning network with participants representing more than \$10 trillion in assets under management. Network participants have found explicitly integrating ESG factors into investment processes is an effective way to reduce risk and enhance returns. They would like to comment and share their expertise on this important matter, however 30 days is insufficient time for a comment period in the current situation.

We encourage the DOL to provide additional opportunities and time to collect information to ensure that the Department and practitioners have a shared understanding of the impact of the rule and how fiduciaries will be required to act in response to it.

We are concerned that 30 days is insufficient due to pandemic-related productivity challenges, economic challenges, and asset price volatility that asset owners and investors are trying to manage.

We believe that 90 days will provide a reasonable opportunity for interested parties to submit comments.

Thank you for taking our views into consideration.

Yours sincerely,

Georges Dyer  
Co-Founder and Executive Director  
The Crane Institute of Sustainability

Alice DonnaSelva  
Managing Director  
The Crane Institute of Sustainability