



Engaging in Agency Rulemaking

How to Submit Effective Public Comments

Participating in the rulemaking process through public comments is a key opportunity for public health professionals to provide an agency with real-world experience, expertise, and professional insights. Here are 10 tips for submitting effective comments.

1

Review the request for comments on the Federal Register website.

Visit [federalregister.gov](https://www.federalregister.gov) for details on comment submissions. Begin working well before the submission deadline to allow adequate time for information gathering, drafting, and revising.

2

Take the time to read and understand the proposed rule.

If you have questions or need clarification on the agency's request for comments, reach out to the contact person specified in the Notice of Proposed Rulemaking.

3

Avoid generic submissions.

One unique, evidence-based public comment carries more weight than hundreds of "form letters".

4

Focus on specific sections of the rule.

You do not have to comment on the entire proposal, so focus on the sections for which you can offer detailed analysis, evidence, and real-life examples to form a constructive or critical perspective.

5

Clearly identify the issue or action that your comments address.

Refer to specific words, sentences, or paragraphs from the proposed rule and its justifications. Include page numbers, sections numbers, or other identifiers.



6

Respond to commenters with opposing viewpoints.

With the online comment process, it's easy to read and respond to submissions from others. Only respond if there's something specific that is significant and incorrect.

7

Offer an alternative solution if you disagree with a proposed rule.

Use facts and evidence to explain why your solution is potentially more practical and how it more effectively meets the agency's objectives.

8

Establish yourself as a credible source early on.

Identify your credentials and share relevant personal or professional experience that may distinguish you from other commenters.

9

Be aware of the tone of your writing.

Avoid venting, foul language, and sarcasm.

10

Edit and proofread your comments.

Make sure your writing is clear, free of typos, and grammatically correct. All comments should follow agency directions for formatting, labeling, and submitting.

KEY TERMS

Rules (also referred to as regulations): government actions that carry out, explain, or enforce a law or policy, or describe an agency's organization or procedure

Comment period: the time the public has to submit input before an agency makes a final decision on a proposed rule

Notice of Proposed Rulemaking (NPRM): tells the public that the agency is proposing a new rule or a revision to an existing rule

Final rule: a regulation that has gone through the Notice of Proposed Rulemaking and public comment process and has been approved for publication by policy officials

