

## **Commenting on Federal Regulations** Tips for Submitting Effective Public Comments



Federal agencies are required to seek public input on proposed regulations. This is an opportunity for you, as an expert in your field, to submit public comments to inform national regulatory decision-making. Your concise, evidence-based comments that offer policy considerations or options hold the most impact potential.

## Top tips and recommendations



**1**. Your comments can be as minimal or extensive as you'd like. If you have comprehensive comments on various sections of a regulation, a cover note that summarizes your key points, with attachments/addendums with more detail about each key comment or section, is an effective format.



**2.** Always reference the section of the regulation you are discussing, unless you are commenting broadly about the regulation as a whole. You do not need to comment on every section of a rule. You may only have an opinion about one section, or the general theme of the regulation, and that is okay.



**3. If you think a proposed regulation could be improved, provide specific examples**, including evidence that explains how an alternative may be more effective.

**4. Support your comments with evidence**, including research findings and expert opinions, as well as citations and hyperlinks as applicable. Arguments using sound science and reasoning are more likely to have an influence.



**5. Use your own letterhead (not U-M's)**, as your comments do not necessarily reflect the University's position. You can identify your U-M affiliation in the letter but may want to note that you are commenting based on your expertise and these are your opinions, not those of the University.

a. If your department director sanctions your comments and recommends using U-M letterhead, coordinate with IHPI Policy Engagement & External Relations, as the letter should be shared with U-M Government Relations and/or the Government Relations Officer of Michigan Medicine.

**b.** If you are commenting on the OPPS or IPPS annual regulation, please coordinate with Kim Ross, Government Relations Officer at Michigan Medicine, because she helps coordinate official U-M comments on these regulations.



6. Comments are accepted through 11:59 pm on the due date and can be submitted online or via regular mail.

**7. Federal agencies look closely at all submitted comments** and refer to some of them when a final rule is published. Your comments, whether on U-M letterhead or not, are relevant and will be read and taken into consideration. Note that all comments are publicly available.

- To provide comments, find the webpage for the regulation: <u>www.federalregister.gov/agencies/health-</u> <u>and-human-services-department</u>
- More tips for submitting effective comments: <u>https://ihpi.umich.edu/sites/default/files/2022-</u> <u>08/CommentersChecklist.pdf</u>

FOR MORE IHPI POLICY RESOURCES, VISIT IHPI.UMICH.EDU/POLICY-ENGAGEMENT

Questions? Contact Eileen Kostanecki at ekostan@umich.edu