



Advocacy Tool: How to Submit a Powerful Public Comment

April 2025

Overview of the Federal Rulemaking Process

1. **The Regulatory Process:**
 - a. Agencies issue rules to implement, interpret, or prescribe law or policy.
 - b. Rules are published in the [Federal Register](#) and later codified in the [Code of Federal Regulations](#).
2. **The Administrative Procedures Act (APA):**
 - a. Governs the rulemaking process.
 - b. Agencies must provide opportunities for public participation through written comments.
3. **Types of Rules:**
 - a. **Proposed Rule:** *Includes regulatory text and rationale, open for public comment.*
 - b. **Final Rule:** *Incorporates public feedback and becomes effective after publication.*
 - c. **Interim Final Rule:** *Effective immediately but open for post-promulgation comments (usually for emergencies).*

Significance of Public Comments

- **For Individuals/Organizations:**
 - Influences policy by providing ground-level insights.
 - Ensures rules align with legal and community interests.
- **For Agencies:**
 - Builds administrative records.
 - Highlights legal and practical implications of proposed rules.

Fast-Track Tips

- Use pre-drafted templates.
- Sign onto organizational comments.
- Participate in social media campaigns.

This tool was adapted from a presentation by Elnora Bassey, Pedro Aleman Perfecto, and Carolina Rivera entitled *Influencing Policy: How To Submit Powerful Public Comments to the Federal Register*.

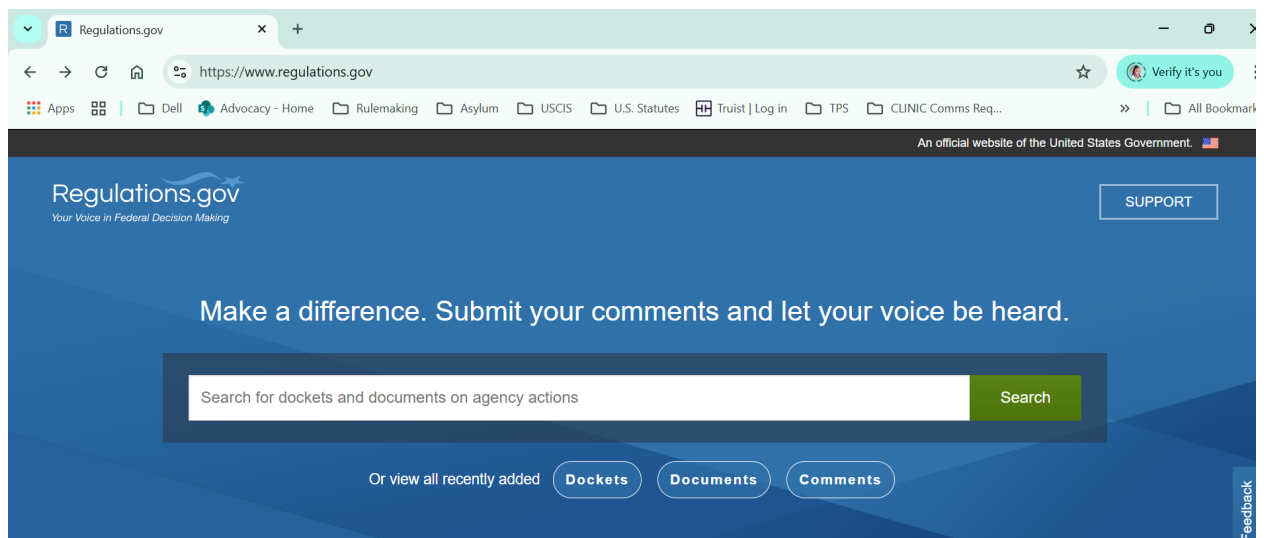
- Encourage others to comment.

Best Practices for Commenting

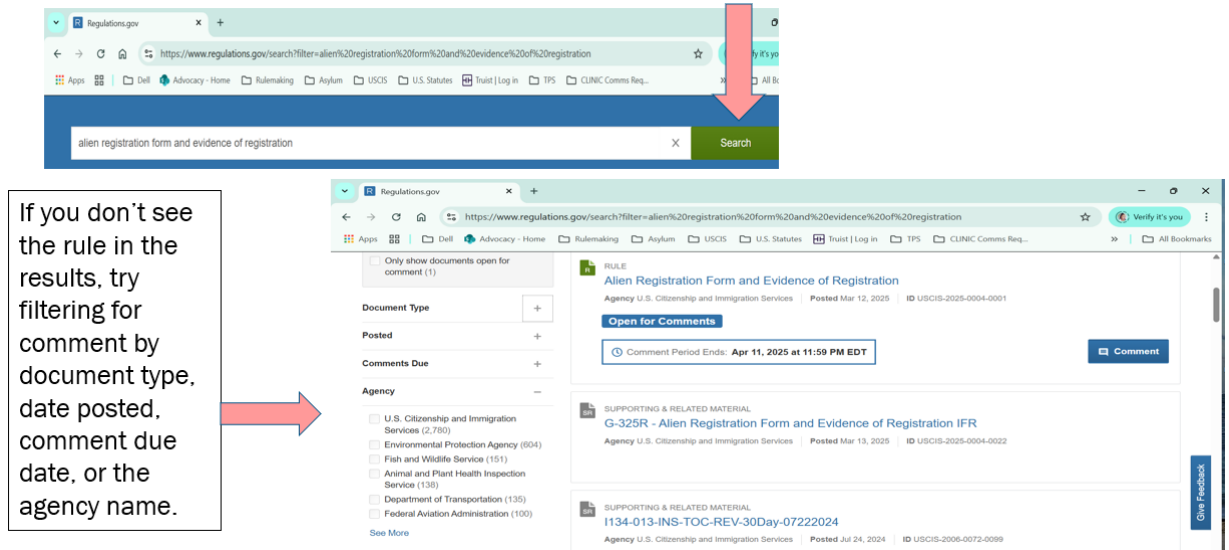
- **Be Clear:** Reference the specific regulation and explain your position.
- **Provide Evidence:** Use data, research, and examples to support your argument.
- **Offer Solutions:** Suggest alternatives or improvements.
- **Be Professional:** Focus on key points and avoid emotional language.
- **Be Unique:** Avoid duplicative comments for greater impact.

How to Submit Comments

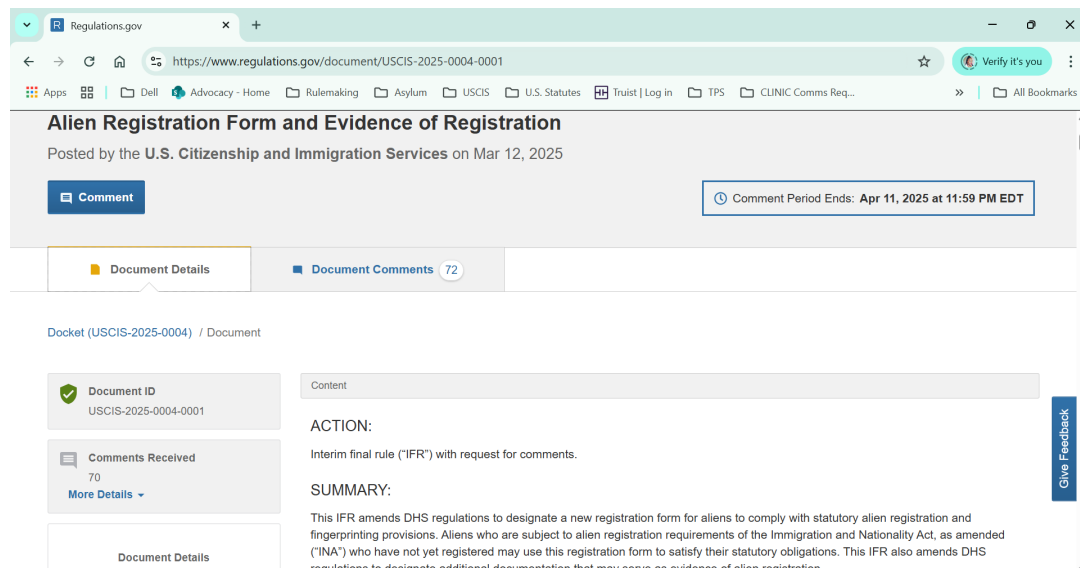
1. Visit [regulations.gov](https://www.regulations.gov).
2. Search by Docket ID, rule title, or keywords.



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3. Click the "Comment" button on the rule's page.



4. Draft your comment (5,000-character limit) or upload a document (PDF preferred).
5. Attach supporting documents.
6. Before submitting, review your comment. You may include personal details if you wish, but please note that all comments are publicly visible, so only share information you are comfortable making public.

Tools and Resources

- **Notifications and Updates:**
 - Sign up at [regulations.gov](https://www.regulations.gov) and [federalregister.gov](https://www.federalregister.gov) for agency notifications.

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- Review the Unified Regulatory Agenda.
- Explore Office of Information and Regulatory Affairs' (OIRA) dashboard for insights into rule reviews.
- **Collaborative Opportunities:**
 - Join advocacy networks, working groups, or listservs.
 - Participate in comment drafting sessions or host a "comment party."

Call to Action

- Stay informed and engaged with ongoing public comment periods.
- Collaborate with advocacy groups to amplify your voice.
- Use your comments to hold agencies accountable and highlight the needs of impacted communities.

For additional resources, contact CLINIC's Advocacy Department at advocacy@cliniclegal.org.