
TIPS FOR SUBMITTING EFFECTIVE COMMENTS

Overview

A comment can express simple support or dissent for a proposed action. However, a constructive information-rich comment that clearly communicates and supports its claims is more likely to have an impact on regulatory decision making.

These tips are meant to help the public submit comments that have an impact and help agency policy makers improve the Qualified Vendor Agreement.

Summary

-  Read and understand the document you are commenting on
-  Be concise but support your claims
-  Base your justification on sound reasoning, scientific evidence, and/or how you will be impacted
-  Address trade-offs and opposing views in your comment
-  There is no minimum or maximum length for an effective comment
-  The comment process is not a vote; one well-supported comment is often more influential than a thousand form letters

Detailed Recommendations

1. Comment period closes at 11:59 M.S.T. on the date comments are due. Begin work well before the deadline.
2. Attempt to fully understand each issue.
3. Clearly identify the issues within the proposed contract action on which you are commenting. If you are commenting on a particular word, phrase or sentence, provide the page number, column, and paragraph citation from the contract document.
4. If a proposed change raises many issues, do not feel obligated to comment on every one; select those issues that concern you the most, affect you the most, and/or you understand the best.
5. Although the Department appreciates all comments, constructive comments (either positive or negative) are the most likely to have an influence.

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6. If you disagree with a proposed action, suggest an alternative (including not regulating at all) and include an explanation and/or analysis of how the alternative might meet the same objective or be more effective.
7. The comment process is not a vote. The Department is attempting to formulate the best provisions, so when crafting a comment it is important that you adequately explain the reasoning behind your position.
8. Identify credentials and experience that may distinguish your comments from others. If you are commenting in an area in which you have relevant personal or professional experience (e.g., owner of a Qualified Vendor Agency, Division member/family member, direct service staff of a Qualified Vendor Agency, Occupational Therapist) say so.
9. Department reviewers look for sound science and reasoning in the comments they receive. When possible, support your comment with substantive data, facts, and/or expert opinions. You may also provide personal experience in your comment, as may be appropriate. By supporting your arguments well you are more likely to influence the Department's decision making.
10. Consider including examples of how the proposed provision would impact you negatively or positively.
11. Comments on the economic effects of rules that include quantitative and qualitative data are especially helpful.
12. Include the pros and cons and trade-offs of your position and explain them. Consider other points of view, and respond to them with facts and sound reasoning.
13. Keep a copy of your comment in a separate file – this practice helps ensure that you will not lose your comment if you have a problem submitting.

Form Letters

Organizations often encourage their members to submit form letters designed to address issues common to their membership. Organizations including industry associations, labor unions, and conservation groups sometimes use form letters to voice their opposition or support of a proposed rule. Many in the public mistakenly believe that their submitted form letter constitutes a “vote” regarding the issues concerning them. Although public support or opposition may help guide important public policies, agencies make determinations for a proposed action based on sound reasoning and scientific evidence, not a majority of votes. A single, well-supported comment may carry more weight than a thousand form letters.

Disclaimer: This document was adapted from “Tips for Submitting Effective Comments” located at [regulations.gov](https://www.regulations.gov) and is intended to serve as a guide; it is not intended and should not be considered as legal advice. Please seek counsel from a lawyer if you have legal questions or concerns.