Rationale
This assignment is designed as an experiential, skill-building exercise in public health law and policy advocacy. It is also an applied orientation for public health agency rulemaking and public notice-and-comment framework as it exists under the Administrative Procedure Act (APA) (5 U.S.C. Chapter 5). This mechanism is utilized by a range of interest groups, including industry lobbyists, patients’ groups, public health advocacy organizations, and interested individuals.

Process and Parameters
2. Consult relevant legal, regulatory, and public health material to educate yourself about the context and implications for the proposed action.
3. Write a 6-8 page public comment brief, following the below framework:
   a. Executive Summary (250 words max, not counted toward page max): stating your position on the issues presented in the docket notice, major supporting arguments and evidence, and recommendations.
   b. Background: (1-2 pages) Brief overview of the evolution and current state.
   c. Analysis: (1-2 pages) Your position and its rationale, including which stakeholders’ interests you are seeking to protect and how.
   d. Actions Recommended: (1-2 pages) state the recommended course of action and what action steps would be needed to accomplish it.
   e. Tables and Figures (optional, with attribution)
   f. Footnotes (no formatting required)
4. A statement that the document was prepared for a law school class will be added to the final comment prior to submission.

Format
- 6-8 pages (not including executive summary and endnotes)
- Double-spaced, 1-inch margins
- 12-point font (Times New Roman or Cambria)
- Footnotes in 10-point font (no formal formatting needed but be consistent, URLs when available)
- Page numbers

Evaluation
The assignment is worth 25% of your final grade, and will be evaluated based on the following criteria:
1. Clear and cogent positions and arguments
2. Grammar and style
3. Adherence to format guidelines
4. Credible and well-cited sources
5. Timely submission

More information in the Federal Register notice here.

A draft of your public comment is due to me by June 16, 2021. After one round of edits, you will submit your public comment to the live Docket here.

The deadline for e-mailing your public comment is June 30, 2021, and the docket will close if you do not e-mail your document in time! You must forward me an e-mail or screenshot confirmation of submission to m.sinha@northeastern.edu AFTER you post to Regulations.gov.