



Tell Our Stories

Best practices for comment submission

In your letter, you must reference the CMS SNF Proposed Rule – [Minimum Staffing Standards for Long-Term Care Facilities and Medicaid Institutional Payment Transparency Reporting \(CMS-2023-0144-0001\)](#).

■ **STAY PROFESSIONAL:**

Courtesy and formality in your comments make your comments more likely to be considered and taken seriously. Avoid sarcasm and rants.

■ **FOCUS ON THE FACTS:**

Does the evidence presented by the agency justify the rule? Are facts or perspectives missing that will make the rule unworkable? Identify contradictions in the rule.

■ **FOCUS ON THE RULE:**

Is the rule making questionable assumptions about the state of the industry, availability of staff, census, etc.?

■ **KEEP IT SHORT:**

Concise comments, up to one page, are more than sufficient.

■ **DRAW ATTENTION TO POOR DECISION BASIS:**

By law, federal agencies are prohibited from submitting rules that disregard facts or don't have a reasonable basis for finalization. Think about the workforce challenges faced by the sector.

■ **BE AUTHENTIC AND UNIQUE:**

Your perspective matters! Use your experience in the sector, your role, the experiences of people you know, etc., to establish your credibility. You're an expert in this case!



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BEST PRACTICES FOR COMMENT SUBMISSION