



<b>Section:</b>	1. Administration
<b>Subpart:</b>	1.5. Conference Operation
<b>Policy No.:</b>	1.5.2.
<b>Title:</b>	Written Comments from NCWM Subgroups to Other Organizations
<b>Effective:</b>	October 11, 2018
<b>Revised:</b>	N/A

## Written Comments from NCWM Subgroups to Other Organizations

**Purpose:** Define the process and format for subgroups to provide official NCWM comment to government agencies and other organizations.

**Background:** From time to time, NCWM has been compelled to provide comment on proposed federal rules and regulations. This may come from the Board of Directors or some other group within the organization. An example was in 2015 when the Packaging and Labeling Subcommittee provided written comments to the U.S. Federal Trade Commission to update FTC's Fair Packaging and Labeling Act regulations. In this case, the Subcommittee had studied and developed thoughtful comments, many which were adopted into regulation.

It is important for the Board of Directors to know who is representing NCWM in this manner and the content of the written comments. It is important for NCWM subgroups to know the notification and approval process for submitting comments on behalf of NCWM.

### **Policy:**

All written comments prepared by standing committees, subcommittees, task groups, NTEP technical sectors or steering committees (i.e., an NCWM subgroup) to be submitted to government agencies or other organizations to provide official NCWM comments shall be:

1. Prepared and approved by the subgroup,
2. Presented to the Board of Directors for prior notice and consent,
3. Placed on official NCWM letterhead as provided by NCWM staff,
4. Signed by the subgroup chairman, and
5. Copied to the NCWM Chairman and Executive Director.