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04 - 0078

January 6, 2004

Sue Lanigan, Chair
Minnesota Administrative Uniformity Committee
HealthEast
1700 University Avenue West
St. Paul, MN 55104

Dear Ms. Lanigan:

This letter is the report to the Minnesota Administrative Uniformity Committee (AUC) required by Minnesota Statutes, section 62J.61, subdivision 5 (1999), which states:

"Subd. 5. **Biennial review of rulemaking procedures and rules.** The commissioner shall biennially seek comments from affected parties about the effectiveness of and continued need for the rulemaking procedures set out in subdivision 2 and about the quality and effectiveness of rules adopted using these procedures. The commissioner shall seek comments by holding a meeting and by publishing a notice in the State Register that contains the date, time, and location of the meeting and a statement that invites oral or written comments. The notice must be published at least 30 days before the meeting date. The commissioner shall write a report summarizing the comments and shall submit the report to the Minnesota health data institute and to the Minnesota administrative uniformity committee by January 15 of every even-numbered year."

Pursuant to subdivision 5, a Request for Comments was published in the November 24, 2003, State Register. In addition to publishing in the State Register, the Department mailed copies of the Request for Comments to persons on the AUC mailing list, and to one of the three persons who worked to get this provision included in the statute, namely, David Feinwachs of the Minnesota Hospital Association. A copy of the Request for Comments was also mailed to Cindy Goff, in lieu of Mary Prentnieks, of BlueCross BlueShield of Minnesota. The third person, Rich Korman, is no longer with the Minnesota Hospital Association.

The Request for Comments asked for comments regarding the rulemaking exemption under section 62J.61 and gave notice of a meeting to be held on January 5, 2004, at which the Department would accept oral and written comments.

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The Department received one written comment in response to the November 24, 2003, State Register publication. The Administrative Uniformity Committee sent a letter dated December 5, 2003, in support of the rulemaking exemption. A copy of the letter is attached.

No one from the public attended the January 5, 2004, meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "D. J. Giese".

David J. Giese, Director
Health Policy and Systems Compliance Division

Enclosure

AAdministrative
Uniformity
Committee

December 5, 2003

Barb Wills
Minnesota Department of Health
121 East 7th Place
P.O. Box 64975
St. Paul, Minnesota 55164-0975

Dear Ms. Wills:

The Administrative Uniformity Committee (AUC) would like to extend our support for the continuation of expedited rulemaking authority as it pertains to the Minnesota Health Care Administrative Simplification Act, Minnesota Statutes, Sections 62j.50 to 62j.61.

As you are aware, the AUC is a broad-based group representing Minnesota health care public and private payers, hospitals, physicians, other providers and State agencies. Our mission is to develop agreement among Minnesota payers and providers on standardized administrative processes when implementation will reduce administrative costs. The purposes of the AUC include acting as a consulting body on matters related to the AUC's mission, researching new issues that may lead to administrative uniformity, bringing issues and recommendations to private industry and/or governmental entities, and communicating important health care issues to the community.

As a frequent advisor to the Minnesota Department of Health on administrative simplification issues, the AUC often needs to react quickly to changes in the health care system. Traditional rulemaking timeframes and the costs involved may diminish the AUC's ability to react quickly. This could cause us to lose some of our effectiveness to improve administrative processes and reduce administrative costs. In our role as advisor to the department, the AUC is confident that the continuation of expedited rulemaking is in the best interest of Minnesota's health care community.

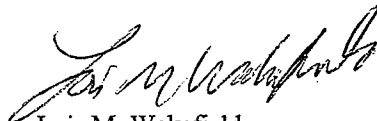
Finally, we in the AUC, believe that the current expedited process has proven effective over the past years, allowing us to disseminate relevant information widely and in a timely manner.

In summary, the AUC would like to go on record as supporting the continuation of expedited rulemaking authority as it pertains to the Minnesota Health Care Administrative Simplification Act.

Thank you for allowing us to respond to the request for comments on this important health care issue.

Sincerely,


Ed Stroot,
AUC Chair


Lois M. Wakefield,
Communications Technical Advisory Group Chair

Allina Hospitals and Clinics ◊ American Association of Healthcare Administrative Management ◊ Blue Cross Blue Shield of MN ◊ Children's Hospitals and Clinics ◊ Delta Dental Plan of MN ◊ Fairview Hospital and Health Care Services ◊ HCPCS Committee ◊ Health Care Payer and Provider Advisory Council ◊ HealthEast ◊ HealthPartners ◊ Hennepin County Medical Center ◊ Mayo Clinic ◊ Medica Health Plan ◊ Metropolitan Health Plan ◊ MN Dental Association ◊ MN Department of Health ◊ MN Department of Human Services ◊ MN Department of Labor and Industry ◊ MN Hospital Association ◊ MN Medical Association ◊ MN Medical Group Management Association ◊ MN Pharmacists Association ◊ MN Uniform Billing Committee ◊ Noridian Administrative Services, L.L.C. - Medicare Part A ◊ Park Nicollet Health Services ◊ PreferredOne ◊ St. Mary's/Duluth Clinic Health System ◊ UCare MN ◊ University of Minnesota Physicians ◊ Wisconsin Physician Services - Medicare Part B

Visit our website at: www.mmaonline.net/auc