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Representative Kelly Moller, Co-Chair  
Representative Paul Novotny, Co-Chair  
Committee Members  
House Public Safety Finance and Policy Committee  
Sent via email: John.Hultquist@house.mn.gov

Dear Chairs and Members:

We write to express serious concerns with HF 2936. This bill, which requires the Department of Corrections to seek legislative approval for any rule change that could possibly cost a jail, lockup or workhouse \$25,000 or more, has the potential to prohibit or significantly delay the implementation of important safety measures, essential technology, or updated training.

In addition, there is no differentiation in this bill for larger jails versus smaller jails. Virtually any new rule or rule change involving physical plant changes, technology, or training is likely to cost more than \$25,000 for implementation in larger jail systems.

The rulemaking process is robust, with multiple opportunities to provide input and to object to potential new rules and rule changes. The process requires the submission of a Statement of Need and Reasonableness (SONAR) from the Department of Corrections and approval from one or more administrative judges. The added layer of process proposed under HF 2936 has the potential to significantly delay the adoption of important rule changes and is simply unnecessary.

Thank you for this opportunity to share our concerns regarding HF 2936.

Sincerely,

*s/Michelle F. Gross*

Michelle Gross  
Chair