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October 7, 2010

Secretary Kathleen Sibelius
The U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Sibelius,


Enclosed you will find a draft of comments jointly prepared by Minnesota State Agencies (Departments of Human Services, Health , and Commerce) regarding Exchange-Related Provisions in Title I of the Patient Protection and Affordable Care Act, 45 CFR Part 170 (PPACA). These comments were not submitted on behalf of the citizens of Minnesota to your department. We obtained this draft through a request for public documents under Minnesota's Government Data Practices Act and believe it contains valuable information and suggestions for your department as you consider promulgating future rules that will govern Minnesota's health insurance exchanges and insurance markets.

Because the Minnesota Department of Health conducted an extensive survey regarding the Exchange provisions in PPACA, we believed the State of Minnesota would submit comments on behalf of all residents and stakeholders in Minnesota. Because the enclosed letter was not sent, we respectfully request that you review and consider the comments contained in this document even if you cannot accord it the deference of an official, timely, state-sponsored letter.

The health care community in Minnesota, including health plans, hospitals and health systems, providers, employers, state agencies and consumers, have been actively and collaboratively evaluating and assessing the value that an insurance exchange will bring to our marketplace and the communities we serve. While we are disappointed that Gov. Tim Pawlenty chose not to apply to your department for Exchange planning funds, stakeholders continue to work collectively to plan for the implementation of an Exchange in Minnesota.

Thank you for considering these comments as you work to implement this important provision of PPACA.

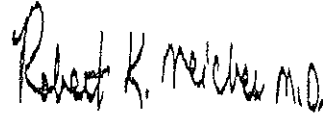
Very truly,



Julie Brunner
Executive Director,
MN Council of Health Plans



Lawrence Massa
President,
MN Hospital Association



Dr. Robert Meiches
Chief Executive Officer,
MN Medical Association

cc:

Sanne Magnan, M.D., Commissioner, Minnesota Department of Health
Cal Ludeman, Commissioner, Minnesota Department of Human Services
Glenn Wilson, Commissioner, Minnesota Department of Commerce
Minnesota Congressional Delegation
Minnesota Health Care Access Commission