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June 20, 2016

Public Comments
Office of Administrative Hearings
Attn.: Denise Collins
PO Box 64620
Saint Paul, MN 55154

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ADMINISTRATIVE
HEARINGS

Re: Proposed Rules for Minn. Board of Examiners for Nursing Home Administrators

The proposed rules by the Board require the submission of a photograph and an attached affidavit. This adds additional expense to the cost of preparing an application, serves little public purpose and is inconvenient.

Research shows that "more attractive" people receive better services. Racial discrimination is also a real problem in our society. Why would the Board add this requirement which adds complexity and the possibility of discrimination?

If the Board insists on a photo (which adds the possibility of accusations of disparate processing of applications based on appearance or race) the Board could simply require a photocopy of a passport photo page or a photo ID card issued by a U.S. or Canadian jurisdiction. This is the same requirement used by some states (like South Dakota) to receive certain official documents. This adds very little in expense or hassle for the applicant.

Yours faithfully,

Edwin Holmwig-Johnson
Submitted by mail as the OAH e-comments system is
bizarrely complicated and non-intuitive.