



<http://le.utah.gov>

Utah State Legislature

Senate • Utah State Capitol Complex • 320 State Capitol
PO BOX 145115 • Salt Lake City, Utah 84114-5115
(801) 538-1035 • fax (801) 538-1414

House of Representatives • Utah State Capitol Complex • 350 State Capitol
PO BOX 145030 • Salt Lake City, Utah 84114-5030
(801) 538-1029 • fax (801) 538-1908

November 10, 2016

Office of Regulations and Interpretations
Employee Benefits Security Administration
Attn: RIN 1210-AB63, Annual Reporting and Disclosure, Room N-5655
U.S. Department of Labor
200 Constitution Avenue NW., Washington, DC 20210

**Comments on Department of Labor Notice of Proposed Rulemaking
RIN 1210-AB63**

On behalf of the state of Utah's Health Reform Task Force, consisting of 11 members of the Utah Legislature, and in response to the Department of Labor's July 21, 2016, request for comments on proposed rule *Annual Reporting and Disclosure* (RIN 1210-AB63), we speak in support of comments on the rule and related proposals submitted by the National Academy for State Health Policy in collaboration with the National Association of Health Data Organizations and the All-Payer Claims Database Council (available at <http://www.nashp.org/wp-content/uploads/2016/10/CA-Final-NASHP-Comments-and-Proposal-to-DOL.pdf>). We believe those proposals to be measured and reasonable, and that they will enable states like Utah to continue operating broad-based all-payer claims databases. Broad-based APCDs are one of the keys to the continuing evolution of high-quality, consumer-centric systems of care.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Christensen", written over a horizontal line.

Allen M. Christensen
Senate Chair, Health Reform Task Force

A handwritten signature in black ink, appearing to read "James A. Dunnigan", written over a horizontal line.

James A. Dunnigan
House Chair, Health Reform Task Force