Utah State Legislature

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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,

Allen M. Christensen
Senate Chair, Health Reform Task Force

James A. Dunnigan
House Chair, Health Reform Task Force