



STATE OF MINNESOTA
Office of Minnesota Secretary of State
Steve Simon

VIA EFILING

January 16, 2026

The Honorable Chief Judge Jessica A. Palmer-Denig
Chief Administrative Law Judge
Court of Administrative Hearings

**In the Matter of the Proposed Permanent Rules Relating to Elections Administration;
Revisor's ID Number R-4824; CAH Docket No. 8-9019-39440; Minnesota Rules
Chapter 8200-8250**

Dear Chief Judge Palmer-Denig:

On December 8, 2025, Judge Eric L. Lipman issued a Report in the above-entitled matter recommending that the Office of the Secretary of State's (OSS) proposed permanent rules relating to election administration be adopted.

The OSS wants to make a change in the rules other than those approved by Judge Lipman, and the OSS requests that you determine whether this change is a substantial change under Minnesota Statutes, section 14.05, subdivision 2. Attached to this letter, are the following documents in accordance with Minnesota Rules, part 1400.2300, subpart 8a:

1. The rule as initially proposed.
2. The rules with our proposed change.
3. The draft amended Order Adopting Rules.
4. The Report recommending adoption of the rules.

Judge Lipman approved some of the OSS's changes as shown in the attached rules as proposed for final adoption. The OSS is proposing to make one additional modification to the rules as proposed by adding an effective date of June 1, 2026, to allow local election officials time to prepare new forms incorporating the new rules and so as not to interfere with the orderly election process of local special elections that will be happening before that date. This change does not make the rules substantially different. Substantively, the rules remain the same as before, but the delayed effective date will ensure an orderly transition process for local election officials. The proposed change that Judge Lipman did not approve is further described in the attached amended Order Adopting Rules and is located on 54.7 of the updated rule draft.

If you have any questions or concerns, please contact me at justin.erickson@state.mn.us or 651-201-6895.

Sincerely,

Justin R. Erickson
Deputy Secretary of State for Operations