

Minnesota Attorney General: Administrative Rules Proceedings

Copyright Notice:

This material may be protected by copyright law (U.S. Code, Title 17). Researchers are liable for any infringement. For more information, visit www.mnhs.org/copyright.

Version 3
August 20, 2018

253

John H. Daniels
Special Assistant
Attorney General

October 18, 1976

- DPW Rule 44

Attorney General

#253

Michael Saeger
Special Assistant
Attorney General

October 20, 1976

Michael B. Miller
Special Assistant
Attorney General

296-4692

DPW Rule 44

Returned as we discussed is the above-captioned rule.

MBM/sr

Enclosures

STATE OF MINNESOTA

DEPARTMENT ATTORNEY GENERAL

Office Memorandum

TO : MIKE MILLER
Special Assistant Attorney General
Department of Administration

DATE: Oct. 15, 1976

FROM : MIKE SAEGER
Special Assistant
Attorney General

PHONE: 296-8553

SUBJECT: DPW Rule 44

The State Welfare Department has asked me to run one last errand for them regarding DPW Rule 44. They would like to have all official copies of Rule 44 be in the format prescribed for printing in the State Register. This has been completed except for the copy that is now in the Secretary of State's Office. The Secretary of State will not accept any rules for filing that do not have your stamp and signature on them. Therefore, I am sending you over a copy of DPW Rule 44 in the State Register format. Could you please stamp it and sign it and either file it in the Secretary of State's Office or return it to me and I will file it in the Secretary of State's Office.

The Welfare Department wishes that all copies of the rule be uniform so that anyone having a copy of the rule will be able to easily fit later amendments into it.

MS:bg

Enclosure

253

Attorney General

Michael Saeger
Special Assistant Attorney General
Department of Welfare

September 7, 1976

Michael B. Miller
Special Assistant Attorney General

296-4692

Department of Welfare Rule 44

Enclosed please find two copies of the above-captioned rule as filed with the State Register.

MBM/sr

Enclosures

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC WELFARE
CENTENNIAL OFFICE BUILDING
ST. PAUL, MINNESOTA 55155

OFFICE OF THE
COMMISSIONER
612/296-2701

GENERAL
INFORMATION
612/296-6117

September 15, 1976

Honorable Warren Spannaus
Attorney General
Room #102 - State Capitol
St. Paul, MN 55155

Dear Mr. Spannaus:

Enclosed please find copies of proposed amendments to Minn. Rule DPW 44, along with the necessary documents pertaining to its promulgation and adoption, as required by Minn. Rules Atty. Gen. 301 to 305.

Please approve the form and legality of proposed amendments to Minn. Rule DPW 44 so that it may be properly filed with the Secretary of State pursuant to applicable provision of Minnesota's Administrative Procedures Act.

Thank you for your cooperation and assistance in this matter.

Sincerely,

Vera J. Likins
Commissioner

VJL:db
Enclosure

The Commissioner of Public Welfare proposes the following amendments to DPW Rule 44 (Aid to Families with Dependent Children).

Amendment (a)

DPW Rule 44 (Aid to Families with Dependent Children) is amended by relettering part (IV) (m) (2) (V) as part (IV) (m) (2) (W) and inserting a new part (IV) (m) (2) (V) to read:

(V) ~~Other income disregards as mandated by federal or state law.~~

(V) Annual supplemental housing allowances provided to AFDC recipients in lieu of income-adjusted homestead credits under M.S. § § 290A.01 to 290A.22 if approved by the United States Department of Health, Education, and Welfare;

(W) Other income disregards as mandated by federal or state law.

Amendment (b)

DPW Rule 44 (Aid to Families with Dependent Children) Part (V) (a) is amended by striking subparts (2)(B), (2)(C), (2)(D), and (3) and inserting in lieu thereof:

~~(B) A "non-shared household" is one in which all persons in the household are eligible for and receive assistance in one AFDC check; if two AFDC checks are received by the household because more than one county is financially responsible, the household is "non-shared".~~

~~(C) A "shared household" is one in which AFDC recipients live with one or more persons not eligible for AFDC or who receive AFDC as a separate recipient unit (see exception in definition (B) above.) A shared household's standard of need is less than that of a non-shared household because, on a state-wide average, the per capita living costs of shared households have been found to be less than non-shared households; the difference is not due to the income, actual or supposed, of the non-eligible person in a shared household.~~

(D) ~~NOTE:--If-the-only-non-eligible-person-living-with-an-AFDC-recipient-unit is-a-boarder-(meals-only),-a-foster-child-placed-by-a-licensed-child-placing agency,-an-agency-placed-or-approved-homemaker,-housekeeper,-or-live-in attendant,-an-unborn-child,-or-an-SSI-recipient,-the-household-is-"non-shared". If-the-non-eligible-person-is-a-roomer-or-boarder-and-roomer,-the-household is-"shared".~~

(3) ~~Needs-Standards~~

~~#-of-Eligible-Persons In-Recipient-Unit~~	~~Non-Shared Households~~	~~Shared Households~~
~~1~~	~~136~~	~~73~~
~~2~~	~~272~~	~~177~~
~~3~~	~~330~~	~~225~~
~~4~~	~~385~~	~~293~~
~~5~~	~~432~~	~~341~~
~~6~~	~~479~~	~~396~~
~~7~~	~~526~~	~~468~~
~~8~~	~~566~~	~~537~~
~~9~~	~~607~~	~~589~~
~~10~~	~~641~~	~~613~~
~~each-person-over 10,-add~~	~~33~~	~~24~~

(V)(a)(2)(B) The "Child Only Standard" applies to a family in which no adults are eligible persons.

(C) The "Family Standard" applies to families in which one or more adults are eligible persons. For purposes of AFDC, an eligible caretaker under age 18 is considered an adult.

(3) Family Allowances

Eligible Persons	Child Only Standard	Family Standard
1	$136	
2	216	272
3	268	330
4	330	385
5	366	432
6	398	479
7	437	526
8	471	566
9	505	607
10	533	641
Each person over 10, add	33	33

Amendment (c)

DPW Rule 44 (Aid to Families with Dependent Children) is amended deleting a portion of part (IV) (m) (9) (B) and adding a new (C) and renumbering existing (C) as (D) as follows:

(B) Unless otherwise excepted, lump sum payments and windfalls, ~~including tax refunds~~ are unearned income in the month received and are considered property thereafter.

(C) Income tax refunds are counted as income.

APPROVED AS TO FORM AND LEGALITY
OCT 15 1976 19
WARREN SPANNAUS, ATTORNEY GENERAL
BY /s/ Michael E. Miller
SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
OCT 15 1976 - 3:45 pm
Joan Anderson Growe
Secretary of State

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE VERA J. LIKINS

COMMISSIONER OF PUBLIC WELFARE

In the Matter of Proposed Amendments to Rule 44 of the Minnesota Department of Public Welfare Governing Administration of the Aid to Families with Dependent Children Program

ORDER FOR HEARING

In order to effectively implement Title IV of the Federal Social Security Act and provisions pertaining thereto, as well as Minnesota Statutes § § 256.12, 256.72 through 256.878 (1974) and Minnesota Laws 1975, Chapter 334, § 1, Subd. 1, 2, 3, and § 18, along with provisions of recent decisions of the United States District Court for the District of Minnesota and the Minnesota Supreme Court, the Commissioner of Public Welfare deems it necessary to consider amendment of Minn. Rule DPW 44 pursuant to the authority vested in me by Minnesota Statute 256.01, Subd. 4 (2) (1974).

NOW, THEREFORE, IT IS ORDERED that a public hearing on the proposed amendment of Minn. Rule DPW 44 be held in the State Office Building Auditorium (Room 83), Wabasha Street (between Aurora and Fuller), St. Paul, Minnesota 55155, on Thursday, July 15, 1976, commencing at 9:30 A.M., and continuing until all representatives or other interested groups or persons have had an opportunity to be heard.

IT IS FURTHER ORDERED, that notice of said hearing shall be given and copies of the proposed amendments shall be made available to all representatives of associations or other interested groups or persons who have registered their names with the Secretary of State for that purpose.

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC WELFARE

Vera J. Likins

VERA J. LIKINS
Commissioner

Dated: June 8, 1976

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE VERA J. LIKINS

COMMISSIONER OF PUBLIC WELFARE

In the Matter of Proposed Amendments to Rule 44 of the Minnesota Department of Public Welfare Governing Administration of the Aid to Families with Dependent Children Program

NOTICE OF HEARING

Notice is hereby given that a public hearing will be held pursuant to Minnesota Statutes 15.0412, subd. 4 (1974), as amended by Minnesota Laws 1975, Chapter 413, regarding the above entitled matter, in the State Office Building Auditorium (Room 83); Wabasha Street (between Aurora and Fuller), St. Paul, Minnesota, on Thursday, July 15, 1976, commencing at 9:30 A.M., and continuing until all representatives or other interested groups or persons have had an opportunity to be heard concerning adoption of the proposed amendments to Minn. Rule DPW 44 by submitting either oral or written data, statements or arguments. Statements or briefs may be submitted without appearing at the hearing.

Under Minnesota Statutes 10A.01, subd. 11 (1974), any individual representing persons or associations attempting to influence administrative action, such as promulgation of amendments to this rule, must register with the State Ethics Commission as a lobbyist within five [5] days of the commencement of such activity by the individual. [The State Ethics Commission is located at Room 410, State Office Building, St. Paul, Minnesota 55155.]

The Commissioner proposes to amend Minn. Rule DPW 44 by adding the following:

(a) Provisions implementing Minnesota Statutes Section 256.897 (1976 Supplement) regarding Supplemental Housing Allowance;

(b) Provisions regarding computation of need for family allowances under a "Child Only" and "Family Standard", replacing the present computation of need under "Shared" and "Non-shared" household standard;

(c) Provisions counting income tax refunds as income.

Minn. Rule DPW 44 governs the Aid to Families with Dependent Children program in Minnesota.

Testimony or other evidence to be submitted for consideration should be pertinent to the matter at hand and may be presented either orally or in writing at the public hearing or by mailing a statement to: George Beck, Office of Hearing Examiner, 1745 University Avenue, St. Paul, Minnesota 55104, within 20 days following conclusion of the hearing. If the person submitting a written document cannot be present to read his statement at the hearing, the document will be entered into the record. For those persons wishing to submit written statements or exhibits, it is requested that at least three (3) copies of each statement, exhibit or summary be furnished at the hearing. It is suggested that to save time and avoid duplication, those organizations or associations sharing common viewpoints or interests in these proceedings join together where possible and present a single statement on behalf of such interests.

It is expected that about 130 people will attend the hearing and that the hearing will consume about four hours.

Copies of the proposed amendments are now available and may be obtained by writing:

R. Grabko, Supervisor, AFDC Section
Assistance Payments Division, Minn. Department of Public Welfare
4th Floor, Centennial Office Building
St. Paul, Minnesota 55155
Phone: (612) 296-6440

Additional copies will be available at the door on the date of the hearing.

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC WELFARE

Vera J. Likins
Commissioner

Dated: June 9, 1976

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

DEBRA BROOSTIN, being duly sworn on oath deposes and says;

1. That she is an employee of the Minnesota Department of Public Welfare.

2. That on the 9th day of June, 1976, she went to the Minnesota Secretary of State's Office and requested a current list of all representatives of associations or other interested groups or persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to Minnesota Statutes 15.0412 (1974), as amended by Minnesota Laws 1975, Chapters 380 and 413.

3. That on the 9th day of June, 1976, in response to the above request, the Secretary of State provided her with such a list, a copy of which is attached hereto and incorporated by reference.

Further affiant sayeth not.

Debra Broostin
DEBRA BROOSTIN

Subscribed and sworn to before me
this 9th day of June, 1976.

Patricia A. Schultz
PATRICIA A. SCHULTZ
Notary Public, Dakota County, Minn.
My Commission Expires June 19, 1981

PUBLIC WELFARE

Allin, Kent, Welfare Advocacy Unit, 370 Selby Avenue, St. Paul, MN 55102

Anoka Co. Comprehensive Health Dept., Courthouse, Anoka, MN 55303

Blade, Joe, Mpls. Star, 425 Portland Ave., Mpls MN

Community Mental Health Bd. of the Northern Pines Mental Health Ct., 103-105 1st St. S.E. Little Falls, MN 56345

Curtis E. Louis (Dr.) Prof. Education U M, Morris, MN 56267

Dale, Randy L., Immanuel-St. Joseph Hospital, Mankato, MN 56001

Damon Corp., Att: B.G. Goodman, 115 4th Ave, Needham Heights, MA 02194

Deephaven Montessori School, Inc., 188 S. Circle A Drive, Wayzata, MN 55391

Friesen, Miller A., Hiawatha Valley Mental Health Ct., Box 619, Winona 55987

Goldberg, Paula, 5315 James Ave. S., Mpls 55419

Henn Cty Family Day Care Ass., 404 E. 48th St., Mpls 55409

Hiawatha Valley Mental Health Center, 76 E. 4th St., Winona 55987

Karlins, Miriam, 6450 York Ave S., Mpls 55435

Kurtz, Kirsten (Mrs.) MN Nurses Assn., 1821 Univ Ave., St. Paul 55104

Legal Aid Society, 501 Park Ave, Mpls 55415

Local #34, AFSC & ME, Box 2016, Commerce Sta., Mpls 55415

Lutheran Soc. Service, Att: H.L. Paulsen, 2414 Park Ave S., Mpls 55404

Minneapolis & Henn Cty Mental Health Clinic, 619 S 5th St, Mpls 55415

MN Assn. for Ed. of Young Children, Rm 373 S. Griggs Midway, 1821 Univ. St. Paul 55104

MN Ass. of Health Care Facilities, 2850 Metro Dr., Suite 431, Mpls. 55420

MN Legislative Comm of Blind, 1605 Eustis, St. Paul, MN 55108

MN Recipients Alliance, 116 E. 32nd St., Mpls 55404

MN State Pharmaceutical Ass. 2388 Univ Ave, St. Paul 55104

MN Valley Soc. Adaptation Center, Att: M.Jones, 100 Freeman Dr., St. Peter 56082

Mitchell, Malcolm, Met Health Bd, 300 Metro Sq. Bldg. 7th & Robt, St. Paul

Moratzka, Timothy, 1304 Vermillion St., Hastings, MN 55033

Neff, Walter S. (Dr.) Virginia, MN 55792

Northland Mental Health Center, 415 S. Pokegema, Grand Rapids 55744

N.W. Mental Health Center, Inc., Box 603, Crookston, MN 56716

Public Relief, Bd of Public Welfare, Att: Dir Jensen, 250 S. 4th St., Mpls 55415

Rosenthal, Robert F., Hospital Adm., 2110 E. Center St., Rochester 55901

Sister Letitia M. Close, B.V.M., 415 Summit Ave, St. Paul, 55102

Southwestern Mental Health Center, 306 N. McKenzie St. Luverne 56156

Upper Mississippi Mental Health Ct., Att: Dr. Howard C. Reid, 510 Beltrami, Bemidji, MN

Usher, Janice, Isanti Co. Public Health Nursing Serv., 237 SW 2nd, Cambridge 55008

Veterans Affairs, Veterans Service Bldg, St. Paul 55155

Welfare Rights Organization, Stephen Parsons, 1118 Newton Ave N. Mpls 55411

West Central Mental Health Center, 323 W. 6th St. Willmar 56201

ALBERT,AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

ALLENDORF MARSHALL
220 GRAIN EX 400 S 4TH
MPLS MN
55415

AMER CAMPING ASSN
3639-21/2 ST N.E.
MPLS MN
55418

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON GRAHAM
951 E HENN
MPLS MN
55414

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ANDERSON HAROLD
BOX 3047
MANKATO MN
56001

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN.
55435

ANDERSON MARY
4425 RUTLEDGE AVE
EDINA MN
55436

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

ANTHONY DICK WDSM RADIO
230 E SUPR ST
DULUTH MN
55102

ANTI-TRUST DIV.ATTY GEN.
160 STATE OFF BLDG
ST PAUL MN
55155

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ARROWHEAD REGIONAL DEV CO
200 ARROWHEAD PLACE
DULUTH MN
55802

ARVER JOHN A
2467 COHANCY
ST PAUL MN
55113

ASMUSSEN,DENNIS,MPIRG
3036 UNIV AVE SE
MPLS MN
55414

ASSOCIATED GEN CONTROF MN
48 E 8TH STREET
ST PAUL MN
55101

ASSOCIATED INDUST OF MPLS
NATIONAL BLDG
MPLS MN
55402

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

ASSN RESIDENCES FOR RETARDED
459 RICE SUITE 301
ST PAUL MN
55103

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BABCOCK LOCHER NELSON ET AL
118 E MAIN ST
ANOKA MN
55303

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARTHOLOW HAROLD E FIRE C
2600 109 AVE N W
COON RAPIDS MN
55433

BATES DENNIS
446 STATE OFF BLDG
ST PAUL MN
55155

BECK PAT
953 HYACINTH AVE
ST PAUL MN
55106

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BEGALKA D REV
212 N ELK ST
BELLE PLAINE MN
56011

BEMIDJI STATE COLLEGE
PLACEMENT BUR.J.C.BRADY
BEMIDJI MN
56601

BENSONI PETER USW OF AM.
609 PROVIDENCE BLDG.
DULUTH MN

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BERGUSON & LOFGREN
MN GAS 700 LINDEN W
MPLS MN
55403

BEST FLANAGAN ET AL
4040 IDS CENTER
MPLS MN
55402

BEUTEL ROBERT
2200 SILVER LAKE RD
NEW BRIGHTON MN
55112

BLOMQUIST BARRY L
NORTH BRANCH MN
55056

BLOOMINGTON CITY CLERK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

BOLTON MALCOLM
422 ALDRICH AVE NO
MPLS MN
55405

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRICK PHILIP D
807 SELLWOOD BLDG
DULUTH MN
55802

BRIGGS & MORGAN - B F FRIEL
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BRIGHAM E M III
RR4
RED WING MN
55066

BROEKER JOHN
2850METRO DR. SUITE 504
BLOOMINGTON MN
55420

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

BROWN D M GOODRIDGE PUB SCH
IND DIST #561
GOODRIDGE MN
56725

BROWN H D
4961 KINGSBERRY LANE
MINNETONKA MN
55343

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

BRUNING C.R.DEPT.CLINIC.E
BURTON HALL
MPLS. MN
55455

BUCHHOLTZ CHARLES
5044 BRENT AVE E
INV GRV HTS MN
55075

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

BUSCH NOEL
3131 FERNBROOK LANE N
MPLS MN
55441

CABLE COMM SYST-H SARRAZIN
BOX 777
HECTOR MN
55342

CAIN RUTH
730 E 38TH ST
MPLS MN
55407

CAIRNS JOHN A
47TH FLR IDS CENTER
MPLS MN
55402

CAPITOL NEWS SERVICE
BOX 17035
ST PAUL MN
55117

CARLSON CARL L I
7516 80TH ST S
COTTAGE GROVE MN
55016

CARLSON VERNE E
BOX 755 CITY HALL
WILLMAR MN
56201

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CENTRAL BUSINESS DATA
BENSON RADIO ARCADE BLD
BENSON MN
56215

CENTRAL MN REGIONAL DEV COMM
1139 FRANKLIN AVE
SAUK RAPIDS MN
56379

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

CHRYSALIS CENTER FOR WOMEN
2104 STEVENS AVE S
MPLS MN
55404

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CITIZENS LEAGUE
530 SYNDICATE BLDG
MPLS MN
55402

CITY OF ROBBINSDALE
C LARSON 4221 LAKE RD
ROBBINSDALE MN
55422

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN
55108

CLAWSON CONNIE
HELP CT 317-17TH AV SE
MPLS MN

COLEMAN NICHOLAS D
700 LINWOOD AVE
ST PAUL MN
55105

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COMMUNITY DESIGN CENTER
118 E 26TH ST
MPLS MN
55404

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CONSUMER SERVICES DEPT CO
5TH FLR METRO SQ BLDG
ST PAUL MN
55101

COUNTY ATTYS COUNCIL
95 SHERBURNE AVE S203
ST PAUL MN
55103

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

CROW WING CO PLANNING & ADV
COURT HOUSE
BRAINERD MN
56401

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DAHLKE LOIS M
118 S EAGLE ST
BELLE PLAINE MN
56011

DAILEY THOMAS ECONOMICS LAB
370 WABASHA ST
ST PAUL MN
55102

DANKERS, KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DAYTON CHAS SIERRA CLUB
800 MIDLAND BANK BLDG
MPLS MN
55401

DEVELOP DISABILITIES PROGRAM
STATE PLAN 101 CAP SQ
ST PAUL MN
55155

DICKINSON MRS JOANNE
BOX 1065
MARSHALL MN
56258

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DOUGLAS BELL ET AL
2212 AM.NATL BK BLDG
ST PAUL MN
55102

DOW CHEMICAL
47 BLDG

DOYTON MAURICE, MET SEWER BD
350 METRO SQ BLDG

DUDLEY E H
RT 7 BOX 122

DUNN OLIVER PLUMBERS LOC
708 SO 10TH ST

DOW CHEMICAL
47 BLDG
MIDLAND MI
48640

DOYTON MAURICE, MET SEWER BD
350 METRO SQ BLDG
ST PAUL MN
55101

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

DUNN OLIVER PLUMBERS LOC
708 SO 10TH ST
MPLS MN
55404

DZUGAN KEN ST PAUL PLANNING
421 WABASHA ST
ST PAUL MN
55102

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

ENGELBRECHT DOUGLAS
809 RANGE ST
NO MANKATO MN
56001

ENNIS A F BOISE CASCADE
PO BOX 713
INTL FALLS MN
56649

ENV SERV-GEN RESOURCE CORP
6340 INDUSTRIAL DR
HOPKINS MN
55343

EROMAN ROGER TENNANT CO
701 N LILAC DR
MPLS MN
55441

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

ETHICS COMM
RM 410 STATE OFF BLDG
ST PAUL MN
55155

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY.

EVERETT JERRY NW PETRO AS
512 NICOLLET MALL RM917
MPLS MN
55402

EWALD DOUGLAS MINN HOSP ASSN
2333 UNIV AVE SE
MPLS MN
55414

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FAEGRE & BENSON ATTN LIBR
1300 NW BANK BLDG
MPLS MN
55402

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FARRELL FRANK BUR NOR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FILTER LOREN
BOX 36
BRITT MN
55701

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FLADLAND CLINTON MN L&P B
796 RAYMOND AVE
ST PAUL MN
55114

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FLADLAND CLINT MN L&P BUR
795 RAYMOND AVE
ST PAUL MN
55114

FORBES GORDON MINN RRS ASSN
203 HANOVER 480 CEDAR
ST PAUL MN
55101

FORSBERG AGR SERV
518 SUMMIT AVE
NEW ULM MN
56073

FOX W.F. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

FREDRIKSON BYRON ET AL
47TH FLR IDS CENTER M
PLS MN
55402

F W WOOLWORTH CO
3316 W 66TH ST
EDINA MN
55424

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GARDNER HDW - R A JOHNSON
515 WASHINGTON AVE N
MPLS MN
55401

GEBERT K L
220 GRAIN EXCH
MPLS MN
55415

GEO A HORMEL & CO LAW DEPT
PO BOX 800
AUSTIN MN
55912

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GLEESON MICHAEL
909 SOC SC BLDG U OF M
MPLS MN
55455

GLEN. HILLS HOSP.R.VAN HAUER
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GOODMAN DF TEL CABLE TV
302 E SUPERIOR
DULUTH MN
55802

GRAHAM THOS H
854 MIDLAND BK BLDG
MPLS MN
55401

GRAHAM HARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GREATER MET AREA HOSPITALITY
5152 CEDAR AVE S
MPLS MN
55417

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GREEN GARY J
41 SHERBURNE AVE
ST PAUL MN
55102

GREEN JANET
9773 N SHORE DR
DULUTH MN
55804

GRUMMERT REV DONALD
1435 ADAMS ST
MPLS MN
55413

GUSTAFSON DAN-LABOR TEMPLE
312 CENTRAL
MPLS MN
55414

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

H B FULLER CO
2400 KASOTA AVE
ST PAUL MN
55108

HANFT PHILIP M
1200 ALWORTH BLDG
DULUTH MN
55802

HANSON ETHEL
2813 85TH AVE N
MPLS MN
55444

HAROLD J WESTIN CONSTRUCTORS
45 E 8TH ST
ST PAUL MN
55101

HALLBERG LEE & MCCABE
4927 34TH AVE S
MPLS MN
55417

HAUN DR J W GEN MILLS
PO BOX 1113
MPLS MN
55440

HAYES, THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE
MPLS MN
55440

HART PATRICK V
112 E LIBERTY BOX 3271
MANKATO MN
56001

HARTFELDT WILL
434 HAMM BLDG
ST PAUL MN
55102

HAVEN ROBT TWIN TN TREATM
1706 UNIV AVE
ST PAUL MN
55104

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HEANEY BILL
30 W SUPERIOR ST
DULUTH MN
55802

HEARING EX.OFF. M GREENBERG
1745 UNIV AVE
ST PAUL MN
55104

HEIM PAUL
1320 SOO LINE BLDG
MPLS MN
55402

HEINTZ MARY ELLEN
PO BOX 599
CINCINNATI OH
45201

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HENDRICKSON A WM
100 FREEMAN DRIVE
ST PETER MN
56082

HENTHORN GARY WOODSTOCK
7365 LANDAU DR
BLOOMINGTON MN
55438

HILL JIM ASSOC.MILK PROD.
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOLDAHL SCOTT
380 N BLDG GRAIN EXCH
MPLS MN
55415

HOLEY GEO AERONAUTICS
DOWNTOWN AIRPORT
ST PAUL MN
55107

HOLMES EUSTIS ET AL
4610 IDS CENTER
MPLS MN
55402

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HORNER WALDORF - KAZIUKEWICZ
PO BOX 3260
ST PAUL MN
55165

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HOUSE ED STANDING SUB COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HOUSE RESEARCH
RM 17 STATE CAPITOL
ST PAUL MN
55155

HULSTRAND ANDERSON & LARS
PO BOX 130
WILLMAR MN
56201

HULTMAN WARREN R
C/O BARBAROSSA R3
OSSEO MN
55369

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

HUMAN SERVICES
414 LAFFAYETTE RD 5THFL
ST PAUL MN
55101

HUSEBYE, CRAIG J.
5036 FRANCE S.
EDINA MN
55410

HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

HYDROLOGIST
CHIPPEWA NATL FOREST
CASS LAKE MN
56633

HYLAND DEAN
1501 W 50TH ST
MPLS MN
55419

ILLINGWORTH ROBERT C
6750 FRANCE AVE S RM290
MPLS MN

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

INGVALSON VERN MN.FARM BU
3110 WOODDALE DR PO 337
OST PAUL MN
55165

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

INTERSTATE POWER RW STEELE
1000 MAIN ST
DUBUQUE IA
52001

IUOE LOC 49 CHAS SWENSON
2580 UNIV AVE
ST PAUL MN
55101

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

IZAAK WALTON MN DIV
111 E FRANKLIN RM-210
MPLS MN
55404

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

JENSEN ARTHUR,CITY CLK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

JENSEN MRS GAYNOLD
111 WEST 107TH ST
MPLS MN
55420

JOHANSEN BUS SERV INC
19 DAYTON RD
CHAMPLIN MN
55316

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

JOHNSON CLARENCE IBEW LU 292
3615 37TH AVE S
MPLS MN
55406

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

JOHNSON M.D. FRUNDT & FRUNDT

BLUE EARTH MN
56013

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

KABLE RICHARD W

BETHEL MN
55006

KAVANEY RICHARD
1220 NORTHERN FED BLDG
ST PAUL MN
55102

KEABLE MIKE
909 6TH AVE N
ST CLOUD MN
56301

KEENAN RICHARD J
4444 IDS BLDG
MPLS MN
55402

KEILY DANILE
3549 V2 PLEASANT AVE
MPLS MN
55408

KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

KJERVIK DIANE
4302 POWEL HALL U OF M
MPLS MN

KLOSTER MARION PEAVEY CO
730 2ND AVE S
MPLS MN
55402

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KNAPP J A
RM 3 CAPITOL
ST PAUL MN
5515

KNOPP TIMOTHY
COLLEGE FORESTRY U OF M
ST PAUL MN
55108

KNUTSON DR KEITH,BIOLOGY DPT
ST CLOUD STATE
ST CLOUD MN
56301

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

KNVDSON ROBT
4375 BROWNDALE AVE
MPLS MN
55424

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

KRAMER ERNEST W
717 DELAWARE ST SE
MPLS MN
55440

KROEGER CHARLES
122 NW 7TH STREET
FARIBAULT MN
55021

KRONLOKKEN J E
10048 NORD RD
BLOOMINGTON MN
55437

KROON H CLIFTON
210 E WALNUT
MANKATO MN
56001

KUHL CARL
4421 4TH ST NE
COL HEIGHTS MN
55421

KVB ENGINEERING INC
600 S CO RD 18
MPLS MN
55426

LABELLE JUANITA MRS
5816 AQUILA AVE NO
NEW HOPE MN
55428

LAKE SUPERIOR INDUSTRIAL
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LANAHAN E F - SIBLEY CO
184 E 6TH ST
ST PAUL MN
55101

LANGVIN DAVID
7500 80TH ST S
COTTAGE GROVE MN
55016

LANSING & OAKES
400 SIBLEY ST
ST PAUL MN
55101

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

LEAGUE MN MUNIC
300 HANOVER 480 CEDAR
ST PAUL MN
55101

LEAGUE WOMEN VOTERS OF MI
555 WABASHA
ST PAUL MN
55102

LEG.REF.LIB-Z. DEWITT
RM 111 STATE CAPITOL
ST PAUL MN
55155

LIBBEY LEONARD
BOX 17011 NOKOMIS STA
MPLS MN
55417

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LOOS CALVIN J
6809 LYNDALE AVE SO
MPLS MN
55423

LOWE DOUG
2701 N LEXINGTON AVE
ROSEVILLE MN
55113

LYNCH DONALD SIBLEY CO
184 E 6TH ST
ST PAUL MN
55102

MANSFIELD LARRY
HCARC 22 27TH AVE SE
MPLS MN
55414

MCDONALD PHILIP M
2077 SELBY AVE
ST PAUL MN
55104

MCFADDEN G H DISPATCH-PRESS
55 E 4TH ST
ST PAUL MN
55101

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MCLELLAN LARKIN
215 ADM BLDG ST CAPITOL
ST PAUL MN
55101

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENA
CENTENNIAL STUDENT UN
MANKATO MN
56001

MANKATO STATE STUDENT ASSN
BOX 58 MANKATO COLLEGE
MANKATO MN
56001

MANTHEY T J PICKANDS MATHER
1100 SUPERIOR AVE
CLEVELAND OH
44114

MARRINAN MARGARET M
1117 COMMERCE BLDG
ST PAUL MN
55101

MASTOR & MATTSON LTD
315 PEAVEY BLDG
MPLS MN
55402

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MAYO FOUNDATION G ORWOLL
200 FIRST AVE NW
ROCHESTER MN
55901

MECCA
867 GRAND AVE
ST PAUL MN
55105

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MERRITT GRANT POLLUTION CONT
1935 W CO RD 32
ROSEVILLE MN
55113

MET TFR MEN ASSN A ROSENTHAL
1821 UNIV AVE
ST PAUL MN
55104

METROPOLITAN COUNCIL LIBRARY
300 METRO SQUARE
ST PAUL MN
55155

MEYER HERBERT
10824 ZENITH AVE S
BLOOMINGTON MN
55431

MIDLAND GLASS- HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER RICHARD A
1020 PLYMOUTH BLDG
MPLS MN
55402

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MINN RETAIL FED INS
131 METRO SP
ST PAUL MN
55101

MPLS CHAMBER COMM TRANSP DPT
15 S 5TH ST
MPLS MN
55402

MPLS CITY ATTORNEY
325M CITY HALL
MPLS MN
55415

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MIDLAND GLASS-HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER PAUL J PHARMACY SERV
ST MARYS HOSP
ROCHESTER MN
55901

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

MN. ASN.C&IND H.D.PETERSO
480 CEDAR ST.
ST.PAUL MN
55101

MN AFL-CIO L.O. LASHOMB
175 AURORA
ST PAUL MN
55103

MN.BD OF NURSING
717 DELAWARE ST SE
MPLS MN
55414

MN SOC SERV ASS J HOOD
614 PORTLAND
ST PAUL MN
55102

MN STATE SER BLIND-K NATA
1745 UNIVERSITY AVE
ST PAUL MN
55104

MINN ASPHALT PAVEMENT ASSN
555 WABASHA RM 209
ST PAUL MN
55102

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN ELEC COOPERATIVES
4901 W 77TH ST
MPLS MN
55435

MINN. ASSN. PET RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN AUTOMOBILE DEALERS ASSN
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN COMM FOR HANDICAPPED
METRO SQ 492 7TH & ROBT
ST PAUL MN
55101

MINN COMMUNITY DEVELOP SE
512 ROSSMOR BLDG
ST PAUL MN
55101

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN ENV LAW INST INC
PO BOX 15076 COMM STA
MPLS MN
55415

MINN FARMERS UNION PRES O
1275 UNIV AVE
ST PAUL MN
55104

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN HEREFORD-LJ SCHAFER

BUFFALO LAKE MN
55314

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN HOUSING INST N T CAR
7801 METRO PKWY
MPLS MN
55420

MINN HWYS MANAGEMENT SERVICE
407 HWY BLDG
ST PAUL MN
55101

MINN LAND USE COMMITTEE
4344 IDS CENTER
MPLS MN
55402

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINNE MINE CREDIT UNION
3000 HUDSON PK S 100
ST PAUL MN
55119

MINN.MTR.TRANSP. .J.N.DENN
1821 UNIV.
ST.PAUL MN
55104

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN POULTRY & HATCHERY ASSN
BOX 158
MADELIA MN
56062

MN REP STATE CENTRAL COMM
555 WABASHA AVE
ST PAUL MN
55102

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN 55
104

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN SOCIETY ARCHITECTS AIA
NW NATL BK BLDG
ST PAUL MN
55101

MINN SOC CERTIFIED PUB AC
1102 WESLEY TEMPLE BLDG
MPLS MN
55403

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN STATE BD PHARMACY
717 DELAWARE ST SE #351
MPLS MN
55414

MINN STATE CAPITOL EMP UNION
PO BOX 3215
ST PAUL MN
55165

MINN STATE MED ASSN
375 JACKSON ST
ST PAUL MN
55101

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN TEAMSTERS CREDIT UNION
2021 HENN AVE E
MPLS MN
55413

MINN TBR PRODUCERS ASSN
200 CHRISTIE BLDG
DULUTH MN
55802

MINN.TURKEY GROWERS ASSN
2383 UNIV AVE
ST PAUL MN
55114

MINN VETERANS MED ASSN
2175 W HWY 36
ROSEVILLE MN
55113

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MINN-WISC BOUNDARY AREA COMM
600 2ND ST
HUDSON WI
54016

MN ELECTRICAL ASSN
3100 HUMBOLT SO
MPLS MN
55408

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

MOFFITT R C
RM 301 M MPLS CITYHALL
MPLS MN
55415

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SO
BLOOMINGTON MN
55431

MORTON BUILDINGS INC
R #1
FOLEY MN
56329

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

MURPHY DIANA E.
4200 IDS-LINDQUIST VENN
MPLS MN
55402

NASS GEO V HENN CO GEN HO
5TH AND PORTLAND AVE
MPLS MN
55415

NATL CAR RENTAL ATT D MITZEL
5501 GREEN VALLEY DR
MPLS MN
55437

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NAT'L SOLID WASTES-R. GRA
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NEDELL HAROLD - MEINEKE
6300 W LOOP S SUITE 200
BELLAIRE TX
77401

NEREN MADONNA
376 NEAL AVE S
AFTON MN
55001

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NO SUB MONTESSORI-S SADDLER
2487 HELEN COURT
NO ST PAUL MN
55109

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NURSING HOME ADMRS BD EXAMRS
RM 340 717 DELAWARE SE
MPLS MN
55414

NOTTER JULIA
743 W MONTANA
ST PAUL MN
55117

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

O'BRIEN J.DENNIS
1100 1ST NATL.BANK BLDG
MINNEAPOLIS MN
55402

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OLD COLONY GAS & OIL COMPANY
17TH AVE N AT 2ND ST
MPLS MN
55411

OLOFSON ARTHUR MBO & MAI
927 SOO LINE BLDG
MPLS MN
55402

OSTRUM DONALD E
PO BOX 33163
COON RAPIDS MN
55433

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PAYNE COL ALVIN

DEGRAFF MN
56233

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PETERSON JOHN W
510 NW BK BLDG
ST PAUL MN
55101

PETERSON GARY
854 MIDLAND BK BLDG
MPLS MN
55401

PFEIFER AND SHULTZ, INC
1433 UTICA AVE S
MPLS MN
55416

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

PHILLIPS LEGISLATIVE SERVICE
459 RICE ST
ST PAUL MN
55103

PINNETTI NICK M HALEY & A
40 CENTRAL PARK S
NEW YORK NY
10019

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PORTER LYLE O

TRACY MN
56175

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

PORTER DAVID
3212 LONGFELLOW AVE S
MPLS MN
55407

POSS DONALD G
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

POYZER ROBT
BOX 675
FERGUS FALLS MN
56357

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

PROCTOR&GAMBLE L THEOHAR
IVORYDALE TECH CENTER
CINCINNATI OH
45217

PULSCHER RBT SPRINGSTED INC
813 OSBORN BLDG
ST PAUL MN
55102

RADMAN RICHARD-LABOR TEMP
418 AUDITORIUM
ST PAUL MN
55102

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

RAMSEY CO MEDICAL SOCIETY
1500 LOWRY MEDICAL BLDG
ST PAUL MN
55102

RAUENHORST CORP-C ANDERSON
7900 XERXES S. S-2200
MPLS MN
55431

REAGAN MICHAEL
% MINN LEARNING CTR
BRAINERD MN
56401

REARDON MRS HELEN
1125 S E 6TH ST
WILLMAR MN
56201

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

REID DAVID H
5633 WASHBURN AVE S
MPLS MN
55410

REINO O LAINE 3M COMPANY
3M CENTER
ST PAUL MN
55101

RENNER R.H. ST PAUL AREA CC
300 OSBORN BLDG.
ST PAUL MN
55102

RENQUIST ARTHUR NSP CO
414 NICOLLET MALL
MPLS MN
55401

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

RIEKE DAVID R
P O BX 509
THIEF RIV FLS MN
56701

ROE DAVID
175 AURORA
ST PAUL MN
55103

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROBERTS DAVID E
1260 NW NATL BK BLDG
ST PAUL MN
55101

6356 HARE RD
LINO LAKES MN
55014

CLK TREAS
LITCHFIELD MN
55355

118 AVE C
CLOQUET MN
55720

SAN SIMEON DEVELOP CORP
OLD 1ST STATE BK BLDG
PAYNESVILLE MN

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

SATHRE, HARVEY
375 MARION STREET
ST PAUL MN
55103

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

ST PAUL ASSN PLBG HTG MECH
614 AM NATL BK
ST PAUL MN

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

SCHMIDT D R MN ASSN REALTORS
6101 WAYZATA BLVD
MPLS MN
55416

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEW
50 S 9TH ST
MPLS MN
55402

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHUTZ LINDA
RM 328 CAPITOL BLDG
ST PAUL MN
55155

SCHWARTAU NEAL METH HOSP
201 W CENTER ST
ROCHESTER MN
55901

SCHWERMAN EARL JR
1535 8TH AVE SE
ROCHESTER MN
55901

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN
56201

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SELECTVISION INC FR VALEN
245 PARK AVE
NEW YORK NY
10017

SENATE COUN OFF ROOM 24
STATE CAPITOL
ST PAUL MN
55101

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SENATE GOV OP COMM
RM 303 STATE CAPITOL
ST PAUL MN
55155

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHARP BOB
4125 HIGHWOOD RD
ST LOUIS PK MN
55416

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SHELL OIL CO. W.A. ROQUET
ONE SHELL PLAZA BX 2463
HOUSTON TX
77001

SITE ENGINEERS INC
900 REDWELL LANE
APPLE VALLEY MN
55124

SLOCUM CHARLES A
1203 IDS TOWER
MPLS MN
55402

SMERIKA WM.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SMITH MICHAEL
1423 NEWTON AVE N
MPLS MN
55411

SNELL LYN
BOX 314
EDEN VALLEY MN
55329

SNYDER ROBERT W
248 CO B U OF M
ST PAUL MN
55101

SODERBERG HAROLD J
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

SODERMAN ANTHONY
152 S PLAZA BLDG
MPLS MN
55416

STANSFIELD ARLENE LAND O
PO BOX 116
MPLS MN
55440

STATE BD.BARBER EXAMINERS
555 WABASHA
ST PAUL MN
55102

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STATE&FED ASSOC
1101 15TH ST NW_S.309
WASHINGTON DC
20005

STATE & FED ASSOCIATES
1101 15TH ST NW S 309
WASHINGTON DC
20005

STATE REGISTER,MORROW S.
203,95 SHERBURNE
ST PAUL MN
55103

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STEELWORKERS CREDIT UNION
BOX 250
BABBITT MN
55706

STOLPESTAD BROWN & SMITH
1550 NW BK BLDG
ST PAUL MN
55101

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SULLIVAN J KIRK
PO BOX 200
BOISE ID
83701

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SUSSEL CO.ATTN:TED SCHWEN
1850 COMO AVE.
ST PAUL MN
55108

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

SWANSON DALE
P O BOX 339
FOREST LAKE MN
55025

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

SWANSON MORTIMER C
5824 FRANCE AVE S
EDINA MN
55410

SWEITZER R L HONEYWELL INC
2701 4TH AVE S
MPLS MN
55408

TATE VERN 3M CO
3M CENTER 220/6W
ST PAUL MN
55101

THOMPSON CONRAD
1107 23RD ST NW
ROCHESTER MN
55901

THOMPSON HESSIAN ET AL
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

TIMESAVERS INC ATT R S VOLD
5270 HANSON COURT
MPLS MN
55422

TOUCHE ROSS & CO K H STOCKE
780 NORTHSTAR CNTR
MPLS MN
55402

TWIN CITY RETAIL DRUGGIST
2388 UNIV AVE
ST PAUL MN
55104

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VANDERVOORT T J MET WASTE
350 METRO SQUARE BLDG
ST PAUL MN
55101

VAN CLEVE JOHN H
2101 HENN AVE
MPLS MN
55405

VAN DRAKE STEPHEN R
BOX 353
PELICAN RAPID MN
56572

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VIITALA, W.C. HONEYWELL
HONEYWELL PLAZA
MPLS MN
55408

VILLAGE OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
55042

VOLDNESS PERRY
IDS 8TH & MARQUETTE
MPLS MN
55402

VOSS REV GORDON O
11120 NE 7TH ST
BLAINE MN
55434

VOS LEROY
2137 BURNS AVE
ST PAUL MN
55119

WALD JEAN
5746 SANDER DR
MPLS MN
55417

WALTERS THOS H
4510 W 77TH ST STE 235
MPLS MN
55435

WANQUIST ALLEN
RM 252 FEDERAL BLDG
ST PAUL MN
55101

WATERS, DONNA M.
110506 WINDMILL COURT
CHASKA MN
55318

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WELLINGTON R R SKELLY OIL
PO BOX 1650
TULSA OK
75102

WESTIN CHAS W
220 MEDICAL ARTS BLDG
DULUTH MN
55802

WHITING RALPH
555 WABASHA SUITE 204
ST PAUL MN
55102

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WM.MITCHEL COLLEGE LAW LIB.
2100 SUMMIT AVE.
ST.PAUL MN
55105

WILEY ENTERPRISES
101 5TH AVE SE
OSSEO MN
55369

WILLIAMS THOS W
4915 W 35TH ST
MPLS MN
55416

WILSON R GARY PPG INDUST
1 GATEWAY CENTER
PITTSBURGH PA
15222

WIS FEEDER PIG MARKET CO-OP

FRANCIS CREEK WI

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

WOZNIAK D D
401 FIRST FED BLDG
ST PAUL MN
55101

WYANT CLINTON W ATTY

ATKIN MN
56431

YOUNG TODD P
555 WABASHA STE 215
ST PAUL MN
55102

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE VERA J. LIKINS

COMMISSIONER OF PUBLIC WELFARE

In the Matter of the Proposed Adoption of Amendments to Rule 44 of the Minnesota Department of Public Welfare Governing Administration of the Aid to Families with Dependent Children Program

AFFIDAVIT OF MAILING

DEBRA BROOSTIN, being first duly sworn, deposes and says:

That on the 11th day of June 1976, at the City of St. Paul, County of Ramsey, State of Minnesota, she served the attached Notice of Hearing by depositing in the United States mail at said City of St. Paul, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached Secretary of State's list.

Debra Broostin

DEBRA BROOSTIN

Subscribed and sworn to before me this 11th day of June 1976.

Lorraine C. Pfeiffer

LORRAINE C. PFEIFFER
Notary Public, Dakota Co., Minn.
My Commission Expires
Sept. 29, 1979

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE VERA J. LIKINS

COMMISSIONER OF PUBLIC WELFARE

In the Matter of Proposed Adoption of Amendments to Rule 44 of the Minnesota Department of Public Welfare Governing Administration of the Aid to Families with Dependent Children Program

STATEMENT OF NEED

The above captioned rule are amendments to existing rules of the Minnesota Department of Public Welfare. The last time the above-captioned rule was amended was at the hearing held December 2, 1975.

The need to adopt these amendments arises because of:

Amendment (a)

House File No. 980 Chapter No. 334, Laws of 1976 is a Department of Revenue Act that included an amendment to Minnesota Statutes, Chapter 256, a Department of Welfare chapter. This new Welfare section is [256.897][Supplemental Housing Allowance].

The purpose of this new welfare portion of Chapter 334 was to provide AFDC recipients an annual supplemental housing allowance in lieu of the income-adjusted Homestead Credit set forth in Minnesota Statutes, Sections 290A.01 to 290A.22.

Without this legislation, the AFDC recipients would not be permitted to retain this credit because the credit would be considered income in the month received and a resource thereafter. In the absence of a specific law exempting these credits as income when received by AFDC recipients their grants would be reduced by an amount equal to these refunds. In a number of instances grants would be suspended or terminated until statutory resource limits related to AFDC eligibility were again met.

A portion of the legislative intent was also fiscal. By paying the credit as an AFDC Supplement the federal government would be participating in their usual share of the AFDC dollar currently in the amount of 56.84%.

Because an AFDC recipient has the right to voluntarily request the local county welfare department to recover the credit and remain on AFDC with the usual amount of grant, it would be necessary to provide the federal government their 56.84% share of the recovery at a total cost to the state.

Also, Minnesota Laws 1976, Chapter 334, § 18 prevents AFDC recipients from receiving a tax credit under provisions of both Minnesota Statutes, Section 256.897 and under Sections 290A.01 to 290.21.

Exhibits are enclosed as follows:

1. Copy of Chapter 334,
2. Copy of a document prepared by the Department of Revenue explaining how the income-adjusted homestead credit, commonly known as a circuit breaker, is determined,
3. Copy of the interagency agreement between the Minnesota Department of Revenue and the Minnesota Department of Public Welfare.

Amendment (b)

This amendment represents a change from the present shared and non-shared household system of flat grant payments to a "Child Only Standard" and a "Family Standard".

Legal Background

Chapter 765, Subd. 2, Sec. 2, Laws of 1973, authorized the Commissioner of Public Welfare to adopt a "Block Grant" system of grant payments to recipients of Aid to Families with Dependent Children, effective October 1, 1973.

Historical Development of the AFDC Family Allowance Schedule

Prior to October 1, 1973, AFDC needs standards in Minnesota were established for itemized categories. There categories included housing, utilities, basic needs (food, clothing, and personal items), and special need items (such as newspapers, laundry, etc.). The sum of an individual recipient's separate need items in each category was his standard of need for AFDC purposes. The amount of a recipient's AFDC grant was the difference between his available income and his standard of need.

Prior to October 1, 1973, when AFDC recipients lived with non-recipients, the needs of the AFDC recipients were computed as their pro rata share of the household's total needs in each itemized category. For example, an AFDC family of three residing with a fourth individual who was not an AFDC recipient, would be allotted three-fourths of the allowance for housing and other need items. This determination was made solely on the number of non-recipients in the household; the income of the non-recipients and their contribution to the AFDC recipients, if any, made no difference in this determination.

On October 1, 1973, the Minnesota Department of Public Welfare did change the method of determining need standards for AFDC recipients. Rather than computing need by totalling separate need categories, the Department established a single "AFDC Family Allowance Schedule" which averaged the need standards formerly used. This new system is popularly known as the "flat grant".

The "flat grant" standards of need were established by employing a fair statistical average of the needs of AFDC recipients under the AFDC standards used prior to October 1, 1973. The flat grant for shared households was determined by a fair statistical average of needs for AFDC shared households prior to October 1, 1973. Likewise, the flat grant for non-shared households was determined by the fair statistical average of needs for non-shared households. The United States Department of Health, Education, and Welfare approved the Minnesota AFDC Family Allowance Schedule and judged it to be a fair statistical average of needs of recipients under standards used prior to October 1, 1973.

The standards set forth in the current AFDC Family Allowance represent increases of 12% in 1973 and 4% in 1975, as enacted by the Minnesota Legislature.

A court action was initiated in the United States District Court, Hoehle, et al v. Likins, et al., File No. 4-75-284 (D. Minn. 1975), challenging the shared and non-shared household family allowance system. In December, 1975, Judge Donald D. Alsop, United States District Judge, entered an order declaring that the provisions of the AFDC Program Manual of the Minnesota Department of Public Welfare inconsistent with the provisions of 45 CFR § 233.90 and therefore invalid insofar as they are applied to classify as shared households, the households of plaintiffs and other AFDC recipients who reside with non-legally obligated individuals not eligible for AFDC absent proof of actual contribution by the non-legally obligated non-recipients and enjoining application of the shared household standard to such persons.

Judge Alsop further ordered that the Department of Public Welfare be afforded opportunity for appeal and stayed enforcement of his order until the appeal was completed. Appeal has been taken, but the "Child Only" and "Family" allowance standards system was developed as an alternative system in the event the appeal is unsuccessful.

The "Family Standard" applies to families in which one or more adults are eligible persons. For purposes of AFDC, an eligible caretaker under age 18 is considered an adult. The "Child Only Standard" applies to families in which no adults are eligible persons.

The Research and Statistics Section of the Department of Public Welfare arrived at the new standards in the following manner.

Sample Selection for Determination of "Child Only Standard" and "Family Standard"

A sample was selected from a Universe compiled from the AFDC abstracts submitted by the county agencies to DPW for payments made in December, 1971. The criteria for entrance into the universe was that the case had to be one in which there were no eligible caretakers and which was not a foster care case. Each assistance payment listed in the abstract is identified as either an E-1, E-2, E-3, etc. or an 0-1, 0-2, 0-3, etc. The letter "0" signifies the absence of any eligible caretakers in the assistance unit and the number following would then be a count of the number of children whose needs are included in the grant. Each case in the universe was listed by case name, case number and

family size within county. From this universe, a sample was drawn which consisted of fifty percent of the family units identified as 0-2, fifty percent of the assistance units identified as 0-3 and one-hundred percent of all assistance units 0-4 and above. It would not have been necessary to draw a sample quite this large; however, oversampling was intended for the following reasons.

1) This was a supplement to the "Child Only" sample cases drawn in the original Flat Grant Study (1973) thus any cases appearing in both (which was possible since we were drawing from similar universes) were to be eliminated from this study since the required information was already available. There were 63 of these cases.

2) Since the cases we were requesting information on went all the way back to 1971, we had to consider the possibility that some of the case records might no longer be available. There were 66 of these cases.

3) Consideration also had to be given to the fact that since our universe was only from the month of December, 1971; whereas, we were also asking for information for given months of 1972, it would be possible for changes in case makeup (such as adding a caretaker or closing the case) to eliminate some case months from the study.

4) Lastly consideration was given to the possibility of erroneous labeling of cases in the AFDC abstracts; such as labeling a case child only when actually there was a caretaker in the grant or listing foster care cases in the non-foster care section.

Excluding all the cases drawn which had been in the original Flat Grant Study, (63 cases) the sample size amounted to 1,623 cases. Each of these cases were then listed on a schedule and sent to the appropriate county for completion. This schedule requested itemization and amounts of grant standards of assistance including basic, recurring and non-recurring needs.

Determination of Child Only Standard

Since we would not be allowed to use a prorated shelter amount, the next step was to determine a shelter amount which would then be included for any shelter amounts on the returned schedules. This total shelter amount for the various family sizes was derived from a computation done in June, 1974, using the results of the original Flat Grant Study (1973). At that time, Non-Shared Shelter and Non-Shelter cases were identified and flat grants computed separately for the two groups. The differences between these two groups were then essentially the total average shelter costs for the various family sizes. This was then utilized as the shelter amount to be included in the child only cases.

After deriving the shelter amounts that were to be used, a revised monthly grant amount for each month was derived for each child only case in the original Flat Grant Study. These (1973 study) cases were then summarized to be later added in with the results of expanded 1973 study.

As the 1976 study schedules began to come back in from the counties, each one was visually edited. Case months in which problems were evident (such as when the money amounts took excessive jumps or counties noted particular problems) were scrutinized in depth and removed from further tabulation if the problem could not be cleared up. All case months in which caretakers were added to the grant were automatically removed from further tabulation. Once again, the derived shelter amounts for the various family sizes were included in the case month data that passed the editing procedure, thus providing an adjusted grant amount for each case month. The case months were then summarized by family size and added to those previously summarized from the original (1973) Flat Grant Study.

The combined total case months (study months in which grants were provided to cases in the sample) and total derived money amounts by family size were as follows:

Family Size	Case Months	Money Amount	Average Grant
2	1,742	$324,688.47	$186.00
3	1,208	278,290.53	230.00
4	1,230	347,905.60	283.00
5	528	165,689.32	314.00

The number of case months for family sizes 6 and up were insufficient for statistical validity, thus they were eliminated from further study. The average grants derived from the above procedure were then increased by first twelve percent and then four percent to correspond to legislated increases in 1973 and 1975. The results of these computations were as follows:

Family Size	Average Grant
2	$216.00
3	268.00
4	330.00
5	366.00

To derive grant amounts for family sizes six through ten so that a grant's table similar to that presently appearing in the AFDC manual could be made up, the relationship existing for family size five and below between the "new" Child Only grant and the non-shared (or families with eligible adults) grant was extended by percentage to family size ten. The results of this percentage extension represents the end product of the final phase of this 1976 study and were as follows:

Family Size	Child Only Families	Families with Eligible Adults
1	$136	$
2	216	272
3	268	330
4	330	385
5	366	432
6	398	479
7	437	526
8	471	566
9	505	607
10	533	641
Each person over 10	33	33

Amendment (c)

The Minnesota State Supreme Court reviewed the case of Steere v. State of Minnesota Department of Public Welfare (Minnesota Supreme Court No. 45615, filed May 21, 1976), on appeal from a Hennepin County District Court decision. The Supreme Court ruled that tax refunds received by AFDC recipients may constitute "income" which must be applied to meet current needs. The third amendment under consideration implements this ruling into DPW Rule 44.

STATE OF MINNESOTA
DEPARTMENT OF PUBLIC WELFARE

Vera J. Likins

VERA J. LIKINS
Commissioner

Dated: June 14, 1976

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS
ROOM 300 - 1745 UNIVERSITY AVENUE
ST. PAUL, MINNESOTA 55104
(612) 296-6910

RECEIVED
AUG 24 1976
LEGAL
SERVICES

August 23, 1976

Michael Saeger
Special Assistant
Attorney General
Department of Public Welfare
Centennial Office Building
Saint Paul, Minnesota 55155

Re: In the Matter of Proposed Adoption of Amendments to Rule 44 of the Minnesota Department of Public Welfare Governing Administration of the Aid to Families with Dependent Children Program; DPW-76-014-GB.

Dear Mr. Saeger:

Enclosed please find my report in the above-entitled matter together with all exhibits, the attendance sheets, and the original of the transcript.

Sincerely,

George A. Beck

GEORGE A. BECK
Hearing Examiner

GAB:sw
Enclosures

STATE OF MINNESOTA)
(ss.
COUNTY OF RAMSEY)

DPW-76-014-GB

AFFIDAVIT OF SERVICE

SUSAN WOJCIK, being first duly sworn, deposes and says that on the 23rd day of August 1976, at the City of St. Paul, County of Ramsey, State of Minnesota, she served the attached Findings of Fact, Conclusions and Recommendation

unstamped, by placing in the designated tray to be collected by messenger for delivery to the central mailing station as required by Minn. Stat., § 16.54 (1974), a true and correct copy thereof on all persons at the addresses shown on the attached mailing list.

Susan Wojcik

Subscribed and sworn to before me
this 23rd day of August, 1976.

Eileen A. Gaovnik

EILEEN A. GAOVNIK
Notary Public, Ramsey Co. Mn.
MY COMMISION EXPIRES
December 14, 1980

Michael Saeger
Soecial Assistant
Attorney General
Department of PUblic Welfare
Centennial Office Building
Saint Paul, Minnesota 55155

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

BEFORE THE DEPARTMENT OF PUBLIC WELFARE

In the Matter of Proposed Adoption of Amendments to Rule 44 of the Minnesota Department of Public Welfare Governing Administration of the Aid to Families with Dependent Children Program	FINDINGS OF FACT, CONCLUSIONS AND RECOMMENDATION

The above-entitled matter came on for hearing before George A. Beck, duly appointed as Hearing Examiner in this matter, on July 15, 1976 at 9:30 a.m., in the State Office Building Auditorium in the City of Saint Paul, County of Ramsey, State of Minnesota.

This is a rules hearing held pursuant to Minn. Stat. Chapter 15 to determine whether three amendments to Minn. Rule DPW 44 should be adopted.

Members of the agency panel included: Richard Grabko, Supervisor, A.F.D.C. Program, Department of Public Welfare; James Allard, Assistant Supervisor, A.F.D.C. Program, Department of Public Welfare; Ron Rozeski, Research Analyst, Office of Evaluation, Department of Public Welfare; Joel Kvamme, Supervisor of Corrective Action, Department of Public Welfare; Michael Saeger, Special Assistant Attorney General; Susan Haigh, Law Clerk, Office of the Attorney General; Wood Remington, Attorney, Income Tax Division, Department of Revenue; Dorothy McClung, Research Attorney, Department of Revenue.

Witnesses at the hearing included: Joan Guernsey, State Coordinator, Minnesota Recipient Alliance; John Elfelt, Director, Anoka County Social Services; Linda Von Wald, Minnesota Case Aid Association; Michael Fargione, Esq.; Jean Hegberg, Isanti County Family Services Department; Marcia Schmidt, Financial Supervisor, Chisago County Welfare Department; Mary Ellerass, Anoka County Social Services; and Jo Ruzicka, Minnesota Recipients Alliance.

Based upon all the testimony, exhibits and written comments, the Hearing Examiner makes the following:

FINDINGS OF FACT

1. That the following documents were submitted by the Department of Public Welfare (hereinafter the "Department") as exhibits in this matter:

a. Order for Hearing (Ex. 1)

b. Notice of Hearing (Ex. 2)

c. Proposed Amendments to Rule 44 (Ex. 3)

d. Secretary of State's Mailing List (Ex. 4)

e. Supplementary Mailing List (Ex. 5)

f. Affidavit of Receipt of Secretary of State's List (Ex. 6)

g. Affidavit of Mailing (Ex. 7)

h. Statement of Need (Ex. 8)

i. "Financial Effects of Establishing One Budget Standard" (Ex. 9)

j. Statement of Evidence, List of Agency Personnel, and List of Expert Witnesses (Ex. 10)

k. Public Responses to Amendments (Ex. 11)

l. Evidence in Support of Amendment (a) (Ex. 12)

m. Evidence in Support of Amendment (b) (Ex. 13)

n. Evidence in Support of Amendment (c) (Ex. 14)

o. Illustration of Form M-1HC (Ex. 15)

2. That Exhibits 1, 2, and 3, as proposed, were filed with the Office of Hearing Examiners on May 27, 1976 and that Exhibits 1, 2, 3, 4, 5, 6, 7, 8, and 10 were filed with the Office of Hearing Examiners on June 14, 1976. All of the afore-mentioned documents were available for inspection at the Office of Hearing Examiners from the date of filing to the date of hearing.

3. That the record was left open for 20 days following the hearing for receipt of written comments on materials concerning the three amendments to the rule.

AMENDMENT (a)

4. That the agency cited Minn. Laws 1976, Ch. 334 as authority for the promulgation of Amendment (a). Further authority exists at Minn. Stat. § 256.01, subd. 4(2).

5. That Amendment (a) is necessitated due to a statutory change. Minn. Laws 1976, Ch. 334 authorizes payment to A.F.D.C. recipients of an annual supplemental housing allowance in lieu of the income-adjusted Homestead Credit set forth in Minn. Stat. § 290A.01 to 290A.22. This new legislation makes it necessary for the Department to include the supplemental housing allowance as one of the items of income that is not considered a resource in DPW Rule 44 (IV)(m)(2).

6. The only adverse public comment at the hearing was critical of the statute rather than the rule.

AMENDMENT (b)

7. That the agency did not cite statutory authority for the promulgation of the proposed amendment but that authority does exist at Minn. Stat. § 256.01, subd. 4(2).

8. The need for the adoption of this amendment arose due to a decision of the United States District Court, Hoehle, et al. v. Likins, et al., File No. 4-75-284(D.Minn. 1975) handed down in December of 1975. The Court held invalid the shared and non-shared household family allowance system (the definitions and needs standards for which are contained in Minn. Rule DPW 44 (V)(a)(2)(B) through (2)(D) and Minn. Rule DPW 44 (V)(a)(3)) insofar as the system is applied to classify as shared households the households of A.F.D.C. recipients who reside with non-legally obligated individuals not eligible for A.F.D.C. absent proof of actual contributions by the non-legally obligated non-recipients. Since the decision and certain proposed federal regulations would render the shared and non-shared household family allowance system unusable, a substitute had to be found.

9. The Department has proposed as an alternative a "child only" and "family" standard. The "Child Only Standard" applies to a family in which no adults are eligible persons, and the "Family Standard" applies to families in which one or more adults are eligible persons. The alternative of combining the shared and non-shared groups into one category was rejected since this would have in effect reduced the grants to the non-shared group given the dollar limitation of the bi-annual appropriation for A.F.D.C. grants.

10. The dollar amounts listed as family allowances under the "Family Standard" in the amendment are identical to the amounts listed under "Non-shared Households" in the current rule. The dollar amounts for the "Child Only Standard" were developed by surveying the grants of 1,623 December, 1971 A.F.D.C. cases in which there were no eligible caretakers A shelter amount was then calculated using other departmental studies for various family sizes and inserted into the 1971 data. Average monthly grants were then determined and then increased to correspond to legislated increases in 1973 and 1975.

11. The main objection to Amendment (b) was presented by county welfare units who pointed out that the grants under the "Child Only Standard" are an increase over the "Shared Household Standard". The difference is illustrated by data from Mille Lacs County where 40 of 165 A.F.D.C cases would fall under the "Child Only Standard":

"Child Only Standard"

Eligible Persons	# of Cases	Increase in dollar amount over shared household standard
1	19	86%
2	10	22%
3	5	19%
4	4	13%
5	1	7%
6	1	.5%

The county units argue that the increase in benefits is going to those who need it least since in child only cases, there is usually other income available while in the "family standard" cases, the recipients are more typically solely dependent in A.F.D.C. and food stamps. This is illustrated by the fact that in the Mille Lacs County, 28 of 40 child only cases reside with step-parents and only 6 of the 40 cases are also food stamp recipients. The county units have suggested that the amendment will discourage adoption and permit full A.F.D.C. payments to stepfather households no matter how high the income of the step-parent is.

12. The Department has somewhat limited discretion in setting the dollar amount for the "Child Only Standard" since statute (Minn. Laws 1973, Ch. 765) and HEW guidelines require computation of an historical average grant. The 1971 data is the most recent data which has statistics on a non-caretaker or child only basis. The data which produced the "Family Standard" must also be used to produce the "Child Only Standard" to assure that all recipients are treated equally.

13. The amendment will require an increase in A.F.D.C. expenditures of approvimately $10,075,000 annually, of which $5,727,000 would come from federal funds, $2,174,000 from state funds, and $2,174,000 from county funds. Anoka County, for example, would experience an increase in payments of $623,610 annually of which $134,573 would come from county funds.

AMENDMENT (c)

14. That the agency did not cite any statutory authority for promulgation of Amendment (c), however such authority exists at Minn. Stat. § 256.01, subd. 4(2).

15. This amendment is necessitated by the decision of the Minnesota Supreme Court in Steere v. State of Minnesota, Department of Public Welfare, et al., Minnesota Supreme Court No. 45615, filed May 21, 1976, wherein the Court held that income tax refunds are net income actually available for current use on a regular basis and may be considered income to be applied to current need in the A.F.D.C. structure. Since the existing rule, Minn. Rule 44 (IV)(m)(9)(B) provided that tax refunds are unearned income in the month received and property thereafter, the amendment was needed to make it clear that income tax refunds may be regarded as income beyond the month in which it is received, consistent with the Supreme Court decision.

16. The only comment received which was adverse to the proposed amendment was on the grounds that the amendment might cause an increase in expenditures.

Based upon the foregoing Findings of Fact, the Hearing Examiner makes the following:

CONCLUSIONS

1. That the Department of Welfare gave proper notice of the promulgation of the proposed rule amendments.

2. That the Department of Public Welfare has statutory authority to take the action proposed, to wit, the promulgation of the proposed rule amendments.

3. That the Department of Public Welfare fulfilled all relevant substantive and procedural requirements of law or rule.

4. That the Department of Public Welfare demonstrated the need for and the reasonableness of its proposed action, to wit, the promulgation of the proposed rule amendments, with an affirmative presentation of facts.

5. That pursuant to Minn. Laws 1975, Ch. 434, the Department must provide the house appropriations and the senate finance committees with a fiscal note describing the fiscal impact of amendment (b) before putting the amendment into effect.

Based upon the foregoing Conclusions, the Hearing Examiner makes the following:

RECOMMENDATION

It is recommended that the proposed amendments be adopted with consideration given to the Findings of Fact and Conclusions contained herein.

Dated: August 20, 1976.

GEORGE A. BECK
Hearing Examiner

PLEASE TAKE NOTICE that pursuant to Minn. Stat. § 15.0412, subd. 4 and Minn. Stat. § 15.052, subd. 4 (Supp. 1975), the Department of Public Welfare shall make this Report available to all affected individuals upon request for at least ten (10) days before the Department takes any final action on the proposed rules.

The Department shall, if it decides to adopt the rules as originally proposed or amended, submit the complete hearing record to the Chief Hearing Examiner no earlier than ten (10) days subsequent to the receipt of this Report. The Department must submit the rules as originally proposed and the rules as proposed for adoption in final form.

The submission to the Chief Hearing Examiner shall precede review by the Attorney General. The Chief Hearing Examiner shall complete his review and submit his Report to the Department on the issue of substantial changes in the rules within ten (10) calendar days. The Department is then responsible for filing the rules with the Attorney General.

STATE OF MINNESOTA

DEPARTMENT OF PUBLIC WELFARE

In the Matter of the Proposed Adoption of Amendments to Rule 44 of the Minnesota Department of Public Welfare Governing Administration of the Aid to Families with Dependent Children Program

ORDER ADOPTING RULES

The above-entitled matter came on for a hearing before Hearing Examiner George A. Beck of the Minnesota Office of Hearing Examiners, at 9:30 a.m. on Thursday, July 15, 1976, in Room 83 of the State Office Building, St. Paul, Minnesota, after proper notice required by Minn. Stat. § 15.0412, Subd. 4 (1975 Supp.) was served upon all persons, associations and other interested groups registered with the Secretary of State for that purpose.

After affording interested persons an opportunity to present written and oral data, statements and arguments, having heard all of the testimony, having considered all of the evidence adduced and upon the records, files and proceedings herein, and applicable statutory standards or criteria, and having confirmed the need for the above captioned rule and the reasonableness thereof; and

Upon a reveiw of the Findings of Fact, Conclusions and Recommendation of the Hearing Examiner dated August 20, 1976.

NOW, THEREFORE, IT IS ORDERED:

1. That the Findings of Fact, Conclusions and Recommendations of the Hearing Examiner dated August 20, 1976, is adopted by the Department of Public Welfare, and

2. That this rule, identified as DPW Amendments to Rule 44, is adopted this 10th day of September, 1976, pursuant to the authority vested in me by Minn. Stat. § 246.01 (1974).

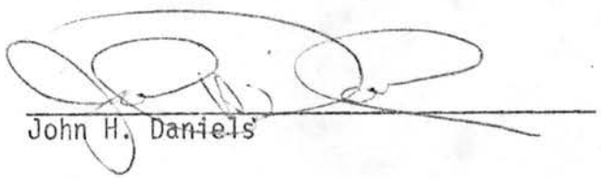
Dated: September 10, 1976.

VERA J. LIKINS
Commissioner of Public Welfare

STATEMENT OF COMPLIANCE WITH

MANUAL OF RULE MAKING PROCEDURES

I, Special Assistant Attorney General John H. Daniels, do hereby declare that I have examined the proposed amendments to Minn. Rule DPW 44, and all related documents and that, based on them and my personal familiarity with the applicable procedures, the Manual of Rule Making Procedures has been followed. Any exceptions are noted below.



John H. Daniels

Dated: September 15, 1976