# COURT OF ADMINISTRATIVE HEARINGS

We're here to help!



# Rulemaking Matters at CAH:

# A Pathway to a Successful Proceeding

Staff and judges from the Court of Administrative Hearings (CAH) are here to share practical insight into how CAH supports agencies during the rulemaking process. The panel will highlight resources available before and during rulemaking proceedings and discuss how judges approach legality reviews of proposed rules under Minnesota Statutes, Chapter 14, and CAH's rules.

These simple steps will set you up for success:



Establish contact with the CAH Rulemaking Coordinator to answer all your initial questions.

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## **RESOURCES**

Reach out to the CAH Staff Attorney Team at 651-361-7900 for procedural support.



# **KNOWLEDGE**

Understand what the CAH Administrative Law Judge is looking for in their review of your rule.

### Rules FAQs

# How long does it take?

10-24 months, in total, depending upon the complexity.



# How many cases for CAH?

On average, 85 cases each year FY20 through FY25.



# How many cases involve a public hearing?

Only 7% of cases FY20 through FY25.



## Your Court of Administrative Hearings Panelists



#### William Moore, Fiscal Note and Rulemaking Coordinator

William is CAH's Rulemaking and Fiscal Note Coordinator. In this role, he provides leadership and guidance for CAH's rulemaking and fiscal note programs, serving as **the first point of contact for agency rule writers**. He also manages the eComments system and is an integral part of helping build CAH's new public comment portal, and works to ensure rulemaking at CAH is transparent, efficient, and independent. During legislative sessions, he also coordinates CAH's fiscal note processes.



### Sarah Mezera, Staff Attorney

Sarah is a Staff Attorney in CAH's Office of General Counsel. She supports judges with research, analysis, and drafting of orders. She also **provides legal and procedural information to agencies and the public**. Before joining CAH in 2023, Sarah worked as an Assistant County Attorney in Hennepin County, an Assistant Attorney General for Minnesota, and as a judicial clerk at the U.S. Court of Appeals for the Eighth Circuit.



### Jessica Palmer-Denig, Assistant Chief Administrative Law Judge

Judge Palmer-Denig has served with CAH since 2016 and is currently an Assistant Chief Administrative Law Judge. She hears contested cases, rulemaking matters, and boundary adjustment proceedings, and conducts mediations and settlement conferences. She previously worked at the U.S. Equal Employment Opportunity Commission, the Minnesota Attorney General's Office, and Dorsey & Whitney LLP. She clerked for Justice Mary Muehlen Maring of the North Dakota Supreme Court and Judge Donovan W. Frank of the U.S. District Court in Minnesota.



#### **Barbara Case, Administrative Law Judge**

Judge Case served as a full-time Administrative Law Judge from 2010 until her retirement in 2024 and now serves CAH as an intermittent judge. She began her career with Mid-Minnesota Legal Aid and the Disability Law Center and later became Director of Compliance for Special Education at the Minnesota Department of Education. These roles gave her broad experience with the rulemaking process from multiple perspectives.

### LEARN MORE ABOUT CAH AND THE RULEMAKING PROCESS

The Court of Administrative Hearings (CAH) Administrative Law Judges review the need for, and reasonableness of all rules proposed by state agencies. Interested members of the public can comment on proposed rules pending at CAH.

CAH hosts a centralized rulemaking <u>eComments</u> website to enable the public to better participate in an efficient and open rulemaking process.

Learn more by scanning this QR code: