

- **Conflict of interest exclusions:** This legislation allows direct appointment to the commission by elected officials with very limited conflict of interest prohibitions. For starters, the list of prohibitions should extend back in time and not only to people who currently hold the positions listed. Six years have been deemed acceptable by the 6<sup>th</sup> Circuit, and nobody has challenged California's 10-year lookback. The 8<sup>th</sup> Circuit is silent on this issue. There should also be a larger universe of partisan actors excluded from eligibility.
- **Appointing authority:** This model has led to partisan squabbles, deadlock, and transparency problems. See entries in [the CHARGE Community Redistricting Report Card](#) for Idaho, Montana, and Washington for examples of some of the challenges this model creates. These challenges arise because direct appointees of elected officials see themselves as acting in the interest of the person and party who appointed them. While increasing the number of commissioners compared to the other states may help with diversity, the underlying problem is that people directly appointed by legislators are often beholden to those legislators instead of focusing on effective representation for communities.
- **Criteria:** The principle on Communities of Interest should be closer to the top and worded like a mandate. Doing this allows the diverse regional voices of Minnesota and its industries to be heard and considered within the process. The criterion banning attempts to advantage or disadvantage an incumbent should be expanded to explicitly ban advantaging or disadvantaging any candidate. Another improvement would be to prohibit approval of maps that result in an undue advantage for a party.
- **Ex parte communications:** The ban on ex parte communications should extend beyond current officeholders. No communication with anybody about drawing boundaries should take place outside of a public meeting.
- **Schedule of hearings:** There should be some language mandating that meetings take place in different regions of Minnesota, on weekends along with weekdays, and at different times of the day to accommodate different work schedules. When we hosted listening sessions in greater MN we heard a lot from local farmers, small business owners, some local chambers and rotaries concerned with key events and meetings being held during workday times when they are busy working their farms, minding their popup produce stands and running their businesses.