

Red Tape Review Rule Report

(Due: September 1, 2025)

Department Name:	Iowa Ethics and Campaign Disclosure Board	Date:	November 12, 2024	Total Rule Count:	Start: 23 End: 20
IAC #:	351—1.1 through 351—1.7	Chapter/ SubChapter/ Rule(s):	Chapter 351 Subchapter 1	Iowa Code Section Authorizing Rule:	68B.32A(1)
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PLEASE NOTE, THE BOXES BELOW WILL EXPAND AS YOU TYPE

What is the intended benefit of the rule?

Subchapter 1 is intended to provide clarity on IECDB procedures and scope.

Is the benefit being achieved? Please provide evidence.

The benefit is being achieved by the rules offered for re-promulgation, as they have been cited by the Board and used for administrative guidance on many occasions.

What are the costs incurred by the public to comply with the rule?

The public does not incur costs to comply with any of the rules in Subchapter 1, as most are offered for adherence by the Board and staff. Elimination of a few rules requiring physical copies of requests, etc. will be a cost savings to the public.

What are the costs to the agency or any other agency to implement/enforce the rule?

All costs to implement Subchapter 1 are in the normal course of agency business.

Do the costs justify the benefits achieved? Please explain.

As noted, there are no additional costs.

Are there less restrictive alternatives to accomplish the benefit? ☐ YES ☒ NO

If YES, please list alternative(s) and provide analysis of less restrictive alternatives from other states, if applicable. If NO, please explain.

Aside from the elimination of obsolete, outdated, inconsistent, redundant, or unnecessary language (as noted below), the rules as offered for re-promulgation are the least restrictive way to offer guidance.

Does this chapter/rule(s) contain language that is obsolete, outdated, inconsistent, redundant, or unnecessary language, including instances where rule language is duplicative of statutory language? [list chapter/rule number(s) that fall under any of the above categories]

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1. 1.1(1): includes Iowa Code section 8.7 in our jurisdiction (changed in 2024 Iowa Acts HF 2708)
2. 1.1(1): language noting the Board is a regulatory agency (already in 68B definition)
3. 1.1(3): procedure for setting meeting time/place is fluid in practice (unnecessary)
4. 1.1(3): stating that meetings must be held in compliance with Iowa Code Chapter 21 (unnecessary)
5. 1.1(3): outdated website URL
6. 1.1(3): in current practice, public comment is at the discretion of the Chair
7. 1.2(1): "authorized agent" language unnecessary
8. 1.2(2): "requests" language repeats 1.3(1)

9. 1.2(3): includes Iowa Code section 8.7 in our jurisdiction (changed in 2024 Iowa Acts HF 2708)
10. 1.3(1): requirement that requests for advisory opinions be delivered to our address (unnecessary)
11. 1.3(2): “at least four members” requirement redundant with 1.1(4)
12. 1.3(2): additional “board” redundant
13. 1.3(4): requirement that advisory opinions be housed physically in our office unnecessary
14. 1.3(4)” outdated website URL
15. 1.3(7): review of advisory opinions to adopt rules not reflective of agency practice
16. 1.4(1): noted lack of federal jurisdiction unnecessary (68A.103)
17. 1.4(5): noted lack of federal jurisdiction unnecessary (68A.103)
18. 1.4(9): noted requirement to comply with 68B.4 unnecessary
19. 1.4(10): listed requirement to comply with 68A and 68B unnecessary

RULES PROPOSED FOR REPEAL (list rule number[s]):

1.3(7), 1.4(9), 1.4(10)

RULES PROPOSED FOR RE-PROMULGATION (list rule number[s] or include rule text if available):

Attached with suggested changes

****For rules being re-promulgated with changes, you may attach a document with suggested changes.***

METRICS

Total number of rules repealed:	3
Proposed word count reduction after repeal and/or re-promulgation	-361
Proposed number of restrictive terms eliminated after repeal and/or re-promulgation	6 (shall) 3 (require) TOTAL: 9

ARE THERE ANY STATUTORY CHANGES YOU WOULD RECOMMEND INCLUDING CODIFYING ANY RULES?

Internal practices not reflected in this subchapter could be codified, including requiring that the Board’s Chair and Vice Chair (elected each year) are from differing political parties. This example is not currently in rule, but is awaiting passage by the Iowa Senate (HF 544).