

## Red Tape Review Rule Report

### (Due: September 1, 2025)

<b>Department Name:</b>	Iowa Ethics and Campaign Disclosure Board	<b>Date:</b>	April 2, 2025	<b>Total Rule Count:</b>	Start: 218 End: 200
<b>IAC #:</b>	351—4.1 through 351—4.62	<b>Chapter/ SubChapter / Rule(s):</b>	Chapter 351 Subchapter 4	<b>Iowa Code Section Authorizing Rule:</b>	68B.32A
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**PLEASE NOTE, THE BOXES BELOW WILL EXPAND AS YOU TYPE**

**What is the intended benefit of the rule?**

Subchapter 4 is intended to provide clarity on campaign finance disclosure procedures.

**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 may incur minimal costs to comply with any of the rules in Subchapter 4 when they are candidates for public office or chairs of other committees. 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 4 are in the normal course of agency business.

**Do the costs justify the benefits achieved? Please explain.**

The costs justify the intended benefit of transparency provided by the agency.

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Aside from the elimination of obsolete, outdated, inconsistent, redundant, or unnecessary language (as noted below), the rules as offered for re-promulgation are the least restrictive way to offer guidance.

**Does this chapter/rule(s) contain language that is obsolete, outdated, inconsistent, redundant, or unnecessary language, including instances where rule language is duplicative of statutory language?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. References to Forms had not been updated to reflect current titles (including independent expenditure forms, etc.).
2. Website address had not been updated in all references.
3. Rules did not provide a blanket statement on filing electronically, as our electronic filing system is now updated to house all campaign reports. Rules for re-promulgation strike this language in multiple rules and add it as one uniform rule.
4. 4.1(1)(a): changes are grammatical and further clarifying to match language in Code (i.e. “state central committee” addition
5. 4.1(1)(b): eliminates unnecessary “categories” to clarify “financial activity”
6. 4.1(1)(c): eliminates unnecessary reference
7. 4.1(1)(d): eliminates outdated and unnecessary reference
8. 4.1(2): eliminates website address to curb future needs to amend rules if the address changes
9. 4.1(3): eliminates repetitive language from 4.1(1)
10. 4.1(4): eliminates duplicate definitions
11. 4.1(5): eliminates duplicate definition
12. 4.2(1): insert “committee” for clarification on whose name
13. 4.2(2): eliminates unnecessary language
14. 4.2(3): eliminates old date reference and duplicative language on amendment statements from other rules
15. 4.3(1): changes made for organization purposes, also eliminates designation between kinds of ballot issues, as all must comply
16. 4.3(2): changes to reflect current practice of nonpartisan offices and eliminates unnecessary language about establishment of a candidate’s committee
17. 4.4(1): changes to reflect current forms
18. 4.4(3): updated language noting our electronic filing system, though hosted on our website, is not actually our website
19. 4.5(4): eliminate reference to a Code Supplement
20. 4.6(1): eliminates unnecessary clarifiers
21. 4.6(2): changes to reflect current practice with regard to running for a new office
22. 4.7: changes to update form names, eliminate unnecessary references, and unnecessary qualifying language
23. 4.8: updates to current practice regarding storage of reports.
24. 4.9 (1-12): eliminates qualifying clauses that are unnecessary and updates rule references
25. 4.9(13): eliminates unnecessary reference
26. 4.9(15): updates form names and eliminates unnecessary reference
27. 4.11(1): eliminates unnecessary reference, eliminates restrictive term
28. 4.11(2): changes to reflect ease of reading
29. 4.11(3): changes to reflect ease of reading
30. 4.12: eliminates Supplement reference
31. 4.13(1): created for organization and citation purposes; changes eliminate unnecessary language
32. 4.13(2): changes for organization purposes
33. 4.13(3): eliminates unnecessary qualifying adjective
34. 4.13(4): updates form names and eliminates duplicative restrictive term from Iowa Code
35. 4.14(1): update verb tense
36. 4.14(2): rephrase
37. 4.14(3): eliminates duplicative language from another rule
38. 4.14(4): updates to current practice regarding the web reporting system

39. 4.14(6-7): created for ease of organization and citation
40. 4.14(8): updates reference and current practice
41. 4.14(11): eliminates unnecessary terms
42. 4.15(1): rephrase
43. 4.15(4): inserts language on unitemized contributions where it makes more sense
44. 4.15(5): updates regarding check numbers to include more committees
45. 4.15(6): changes reflect current practice, as committees use debit cards; eliminates reference
46. 4.15(7): eliminates reference
47. 4.16(1): updates rule reference; rephrases sentence on Schedule F
48. 4.16(2): rephrase instruction on dates, eliminate unnecessary language on indebtedness in the reporting period, updates current practice with regard to report schedules
49. 4.16(3): eliminates duplicative language about debt obligations
50. 4.16(4): eliminates duplicative list and instead includes reference to previous rule where list is located
51. 4.17(1): rephrase
52. 4.17(2): rephrases date requirements, eliminates duplicative language on fair market value from another rule
53. 4.17(4): updates rule reference
54. 4.17(5): inserts language referencing previous list of acceptable general terms; updates list of technology to reflect current campaign practices
55. 4.17(6): rephrase
56. 4.17(8): updates rule reference and inserts clarifying language to reference in-kind, rather than monetary, contributions
57. 4.18(1): eliminates unnecessary language
58. 4.18(4): rephrase, eliminate reference, eliminate unnecessary language
59. 4.18(5): eliminate unnecessary language
60. 4.18(6): update rule reference
61. 4.19(1): created for ease of citation, eliminate unnecessary words, add clarifying language on furtherance of the contract
62. 4.19(2): created for ease of citation and organization
63. 4.20(1): update schedule reference, eliminate definition, rephrase
64. 4.20(2): added definition for organization
65. 4.20(3): update schedule reference, rephrase
66. 4.21: update form reference, eliminate restrictive term, eliminate duplicative language and citations
67. 4.22(1): eliminate unnecessary words
68. 4.22(2): eliminate unnecessary words, change reference from code section to Iowa law generally
69. 4.23: eliminate unnecessary words
70. 4.24(1): created for ease of reference and organization, eliminate unnecessary words
71. 4.24(3)(b): edited for clarification, eliminate unnecessary words
72. 4.24(3)(c): edited for clarification, eliminate unnecessary words
73. 4.24(3)(d): edited for clarification, eliminate unnecessary words
74. 4.24(3)(e): edited for clarification, eliminate unnecessary words
75. 4.24(3)(f): edited for clarification, eliminate unnecessary words
76. 4.24(3)(g): edited for clarification, eliminate unnecessary words
77. former 4.24(3): eliminated for duplication
78. 4.24(4): eliminated unnecessary terms, rephrase
79. 4.24(5): eliminate unnecessary words
80. 4.25(1): add clarifying language from 68A.301

81. 4.25(1)(a-bb): updates to lists based on updates in technology, common campaign tactics, ease of reading; eliminated unnecessary terms
82. 4.25(2)(a-f): updates to lists based on ease of reading, eliminated terms as contradictory
83. 4.25(3)(a-d): updates to lists based on ease of reading, eliminated terms as unnecessary
84. 4.27(1): created for ease of citation, updated form names
85. former 4.27(1): eliminated as duplicative
86. 4.27(2-4): updated form names, added (3) and (4) language for ease of reading, eliminate (3) and (4)
87. 4.27(5): update language to eliminate words, update rule reference
88. 4.28(1): created for ease of reference, eliminate unnecessary reference
89. former 4.28(1): eliminated as repetitive
90. 4.28(3): eliminate unnecessary words
91. 4.30(1): eliminated sentence as repetitive from other rules
92. 4.20(2): rephrase for clarification, eliminate unnecessary reference
93. 4.30(4): eliminate references, eliminate unnecessary terms
94. 4.31(1): created for ease of citation
95. 4.31(3): update rule reference
96. 4.32(1): created for ease of citation, updated references
97. 4.32(3): updated reference
98. 4.32(3)(a-h): update to current Board practice, add clarifying term to (f)
99. former 4.32(3): eliminate as duplicative after creation of electronic filing rule
100. 4.32(4): eliminate unnecessary terms
101. 4.32(5): update rule reference
102. 4.33: change verb tense
103. 4.24: eliminate recitation of Iowa Code, update to current Board practice
104. 4.35: eliminate introductory language as unnecessary
105. 4.35(1)(b): eliminate language as unnecessary
106. 4.35(2): created for ease of citation
107. former 4.35(2): eliminate as duplicative after creation of electronic filing rule
108. 4.35(3): rephrase
109. 4.35(4): eliminate reference to Supplement, change restrictive clause
110. 4.35(5): rephrase
111. 4.36: eliminate unnecessary terms, rephrase
112. 4.37(2)(a-g): reorganized for ease of citation, eliminate unnecessary terms
113. 4.37(3): clean up for rule reference and grammar
114. 4.38(1): created for ease of citation, eliminate unnecessary definition from Iowa Code
115. 4.38(4): rephrase for clarity
116. former 4.38(5): eliminated as redundant
117. 4.39: eliminate unnecessary introductory language
118. 4.39(1)(a-e) and 4.39(2)(a)(1-6): reorganized for citation and ease of reading, eliminated unnecessary terms
119. 4.39(3): update language to "homepage" and "notepad"
120. 4.40: eliminate unnecessary reference, update to include common practice of paid subscriptions for news
121. former 4.41(3): eliminated as unnecessary
122. 4.44: eliminated unnecessary introductory language
123. 4.44(2)(b): eliminate outdated equipment
124. 4.45: eliminate Iowa Code reference as duplicative

125. 4.47: eliminate unnecessary introductory language
126. former 4.47(2): eliminate as duplicative, add sentence regarding corporate facilities to new 4.47(2)
127. 4.47(5): update title of rule, repeat reimbursement language from other rule
128. 4.47(6): eliminate parenthetical references
129. 4.48(1): created for ease of citation, rephrase to shorten, provide clarity
130. 4.48(2): eliminate clause as unnecessary
131. former 4.48(2): eliminate as duplicative
132. 4.51(1): created for ease of citation
133. 4.52(3): eliminate clause as unnecessary
134. 4.52(g): created for ease of citation
135. former 4.53(1): eliminate repeat definition
136. former 4.53(3): eliminate as repetitive
137. 4.54(1): created for ease of citation, eliminate repetitive sentence
138. former 4.55(2): eliminate rule as duplicative after creation of electronic filing rule
139. 4.55(3): rephrase
140. former 4.58: eliminate as repetitive
141. 4.59(1): eliminate unnecessary terms
142. 4.59(2-3): update fines for inflation
143. 4.59(4): eliminate unnecessary clauses
144. 4.59(5): eliminate unnecessary clauses
145. 4.59(6): eliminate outdated references, unnecessary terms
146. 4.59(7): update form names
147. 4.59(8): update to match current law
148. 4.60: update terms, eliminate unnecessary clauses
149. 4.61(2): eliminate unnecessary references
150. 4.62(1): rephrased for clarification
151. 4.63(1-2): created as a default for all forms requiring electronic filing, updated to current Board practice and the current state of the electronic filing system

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

4.1(5), 4.1(6), 4.8(3), 4.8(4), 4.24(3), 4.25(1)(e), 4.27(3), 4.27(4), 4.28(1), 4.32(3), 4.35(2), 4.38(5), 4.41(3), 4.47(2), 4.48(2), 4.53(3), 4.55(2), 4.58.

**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:	18
Proposed word count reduction after repeal and/or re-promulgation	-3,878
Proposed number of restrictive terms eliminated after repeal and/or re-promulgation	29 (shall) 6 (must) 3 (prohibit) 12 (require) TOTAL: 50

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

Statutory changes recommended by the Board include updating the filing deadline to midnight to reflect online filing. This language is included in pending legislation, HF 544.