

Red Tape Review Rule Report (Due: September 1, 2025)

Department Name:	Iowa Ethics and Campaign Disclosure Board	Date:	April 2, 2025	Total Rule Count:	Start: 22 End: 0
IAC #:	351-12.1 through 351-12.12	Chapter/ SubChapter / Rule(s):	Chapter 351 Subchapter 12	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 12 was originally promulgated to clarify agency practices regarding declaratory orders.

Is the benefit being achieved? Please provide evidence.

The rules as they are currently promulgated are potentially redundant with uniform rules provided by the administrative rules coordinator.

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

Costs and time incurred by the public are undertaken in the normal course of business.

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

Time incurred by staff to comply with rule requests are in the normal course and important to the transparency of the agency.

Do the costs justify the benefits achieved? Please explain.

Transparency and responsiveness to lowans are justifiable benefits for the agency to incur 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.

“Less restrictive alternatives” include uniform procedures for these requests across agencies, unless deviation is necessary for agency-specific issues.

Does this chapter/rule(s) contain language that is obsolete, outdated, inconsistent, redundant, or unnecessary language, including instances where rule language is duplicative of statutory language?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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Per 2024 Iowa Acts, Senate File 2370, section 12 uniform rules regarding declaratory orders are forthcoming.

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

The Board proposes rescinding the entirety of Chapter 12..

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

N/A

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

METRICS

Total number of rules repealed:	22
Proposed word count reduction after repeal and/or re-promulgation	-1,907
Proposed number of restrictive terms eliminated after repeal and/or re-promulgation	19 (shall) 1 (must) 2 (require) TOTAL: 22

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

Per Iowa Acts, Senate File 2370, section 12, the uniform rules for agency procedure regarding requesting rulemaking should be adopted by the administrative rules coordinator in coordination with the Attorney General's Office. IECDB commits to promulgating agency-specific rules if necessary to further the interests of stakeholders working with the Board to comply.