

**IOWA ETHICS AND CAMPAIGN DISCLOSURE BOARD[351]**

**Regulatory Analysis**

Notice of Intended Action to be published: 351—Chapter 2

“Public Records and Fair Information Practices”

Iowa Code section(s) or chapter(s) authorizing rulemaking: 17A, 68A, and 68B

State or federal law(s) implemented by the rulemaking: Iowa Code chapters 17A, 68A, and 68B and Executive Order 10

*Public Hearing*

A public hearing at which persons may present their views orally or in writing will be held as follows:

October 21, 2025

Via virtual meeting/videoconference

9 to 9:30 a.m.

[meet.google.com/def-amxu-ztq](https://meet.google.com/def-amxu-ztq)

Or dial: 443.892.2873

Passcode: 459 114 569#

*Public Comment*

Any interested person may submit written or oral comments concerning this Regulatory Analysis, which must be received by the Iowa Ethics and Campaign Disclosure Board (IECDB) no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

## IOWA ETHICS AND CAMPAIGN DISCLOSURE BOARD[351]

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### *Purpose and Summary*

The Iowa Administrative Procedure Act has long required agencies to adopt rules regarding public records and fair information practices. To satisfy these obligations, the IECDB promulgated Chapter 2 consistent with the Uniform Rules on Agency Procedure.

However, 2024 Iowa Acts, Senate File 2370, sections 4 and 12, repealed related requirements and enacted a new Iowa Code section, respectively. The new section states that the Administrative Rules Coordinator, in partnership with the Iowa Attorney General's Office, may adopt a new set of uniform model rules that will automatically apply to agencies in the absence of self-promulgated rules (more information can be found in Iowa Code section 17A.24 as enacted by 2024 Iowa Acts, Senate File 2370).

Accordingly, the IECDB is proposing to rescind Chapter 2 consistent with the principles of Executive Order 10 as being either unauthorized or unnecessary. The IECDB will instead operate under the new model rules and other applicable laws.

### *Analysis of Impact*

#### **1. Persons affected by the proposed rulemaking:**

- **Classes of persons that will bear the costs of the proposed rulemaking:**

There is no expected additional cost to the State or other stakeholders governed by Iowa Code chapters 68A and 68B.

- **Classes of persons that will benefit from the proposed rulemaking:**

The State and stakeholders governed by Iowa Code chapters 68A and 68B will benefit.

2. **Impact of the proposed rulemaking, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred:**

- **Quantitative description of impact:**

No quantitative impact is expected. The IECDB will still operate consistent with Iowa Code chapter 17A and the scope of authority granted pursuant to Iowa Code chapters 68A and 68B.

- **Qualitative description of impact:**

No qualitative impact is expected.

3. **Costs to the State:**

- **Implementation and enforcement costs borne by the agency or any other agency:**

No costs will be borne by any agency. The IECDB will still operate consistent with Iowa Code chapters 17A, 68A and 68B.

- **Anticipated effect on state revenues:**

There is no anticipated effect on state revenues.

4. **Comparison of the costs and benefits of the proposed rulemaking to the costs and benefits of inaction:**

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Not applicable. The IECDB will still operate consistent with Iowa Code chapter 17A and the scope of authority granted pursuant to Iowa Code chapters 68A and 68B.

**5. Determination whether less costly methods or less intrusive methods exist for achieving the purpose of the proposed rulemaking:**

Not applicable.

**6. Alternative methods considered by the agency:**

**• Description of any alternative methods that were seriously considered by the agency:**

Not applicable.

**• Reasons why alternative methods were rejected in favor of the proposed rulemaking:**

Not applicable.

*Small Business Impact*

**If the rulemaking will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rulemaking on small business:**

**• Establish less stringent compliance or reporting requirements in the rulemaking for small business.**

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- Establish less stringent schedules or deadlines in the rulemaking for compliance or reporting requirements for small business.

- Consolidate or simplify the rulemaking’s compliance or reporting requirements for small business.

- Establish performance standards to replace design or operational standards in the rulemaking for small business.

- Exempt small business from any or all requirements of the rulemaking.

**If legal and feasible, how does the rulemaking use a method discussed above to reduce the substantial impact on small business?**

Not applicable.

*Text of Proposed Rulemaking*

ITEM 1. Rescind and reserve **351—Chapter 2.**