

# NASCIO 2016 State IT Recognition Award Nomination

Title **Administrative Rules Public Commenting**

Category **Government to Citizen**

State **Iowa**

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Project initiation and end dates **January 2014 – May 2015**

# Executive Summary: Administrative Rules Public Commenting

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Most citizens are aware of the legislative process resulting in the Code of the State of Iowa. Citizens are not as aware of the administrative rule process and how they can engage and contribute feedback to the rules. In Iowa, both the executive and legislative branches of government are engaged in the administrative rule process. Both branches of government are committed to transparency and citizen engagement. The Office of the Chief Information Officer was enlisted to develop a new public comment system to make it easier for citizens to provide comments on rules. Historically, the process for citizens to submit comments was not uniform. One department might hold public meetings, or offer email submission of comments and another department would only offer submission by phone, fax or U.S. mail.

In May of 2015, the OCIO released <https://rules.iowa.gov> as the uniform and centralized process for public comments, allowing citizens to easily submit comments online.

The new website streamlined a process that required Iowans interested in commenting on proposed rules to navigate through multiple webpages. Previously, Iowans had to navigate to the legislative website, then to the Iowa Law and Rules Webpage, then to the Iowa Administrative Rules Webpage to find the Rules Tracker page. Once there, Iowans could view a rule but couldn't comment it. Rules.Iowa.Gov creates a one-stop shop for viewing rules and commenting on proposed rules they're interested in, while providing associated documents and schedules of meetings.

The public comment site is unique in its ability to allow citizens to enter the comment while viewing the rule, eliminating the need to switch between a window with the rule and another window where the comment was to be entered. The site is also unique in its ability to allow citizens to enter a comment to a specific section of the proposed rule. The site was designed to allow citizens to read through a proposed rule and by clicking on the section they are reading, produce a box in which they can comment specifically for that section. Commenting by rule sections makes the feedback to the agency clear. This feature helps citizens make their feedback very specific.

The new public comment site also offers educational information about the rule making process. The site also includes a directory of all State agencies with contact information and links to the agency rules section, all available on a mobile-friendly site.

Because of the collaboration between the legislative and executive branches, the site now offers a way for citizens to easily find rules that are open for comments, identify how much time is available to comment on the rule, and easily submit their comments. This new website is accessible 24/7 for Iowans to voice their opinion on government rules and brings yet another element of transparency to government.

# Concept

*Key Point: The project addresses an important dilemma in public service and/or encourages civic engagement.*

The Iowa Rules site is only one of a handful of sites across the country that allow for online submission of comments. The UNIQUE aspects of the site include the ability to view the proposed rule change and comment on the rule on a SINGLE PAGE and to be able to COMMENT ON A SPECIFIC SECTION of the proposed rule. We believe this is the first site to allow comments to be posted by rule section. While there has not been a significant increase in the number of public comments submitted online we do see significant traffic to the site and an average of 10 minutes per visit spent on the site – citizens are reading the proposed rules!

## IMPROVEMENTS IN THE PUBLIC COMMENT PROCESS INCLUDE:

The new site reduces the risk that a citizen's comment does not make it to the organization. With the old comment submission process, citizens may have misaddressed an envelope or incorrectly typed an email address. These risks are eliminated by automating the commenting process.

An email automatically generated by the site is sent to the submitter with the text of their submission, contact information and proposed rule they commented on. This provides a record to the citizen and acknowledges their submission. This reduces agency staff time required to reply to emails of comment submission and ensures the citizen knows their feedback was received.

The centralized commenting system also makes for an easy and uniform process, reducing confusion about how to submit comments.

If citizens are in an association or community meeting, they can comment on the rule while it is being discussed, thus providing citizens the ability to comment on the rule from anywhere.

Easily identifiable comment period with a large graphic and display showing the number of days remaining for comment. This removes confusion about the deadline and eliminates the need for citizens to calculate the days available to comment.

### *What project management approach was taken?*

The project was managed through the Project Management Office of the Office of the Chief Information Officer. Since the Public Comment application linked legislative and executive branch rule systems, the project required strong executive leadership from the CIO and good project communication by the Project Manager to keep all participants informed and engaged.

### *What are the costs (people, time, dollars)?*

The project was developed in approximately 19 months at a cost of \$263,000.

### *How will the initiative be assessed?*

The system tracks each time a rule is viewed and when comments are submitted online. Tracking the number of views and comments for proposed rules establishes a baseline for citizen engagement that can be tracked year over year.

### *What efforts are made to ensure accessibility and information security?*

The system design is highly secure, starting with the use of HTTPS protocol and strict security scan of the application by the Information Security Office. The system has a clean design, allowing the user to understand how to search for information. All State of Iowa websites and applications have a consistent

header with a “Sliver” allowing users to navigate to the State of Iowa homepage or search state sites for information.

The key design criteria and the CREATIVITY applied to the site were to make it simple. This meant the navigation through the site had to have an easy menu. Buttons had to be large and clearly labeled. Graphics were used to represent the remaining time available to comment on the rule.

The OCIO development team uses the WebAim WAVE tool to ensure developed sites are accessible and Section 508 compliance. Developers use appropriate fonts and color contrast, and they ensure images are tagged and necessary headers used on each webpage. These efforts result in an application that can be trusted by citizens to accurately collect their comments and input in an easy manner, while their information is safeguarded.

*Describe to what extent the state is responsible for oversight of the initiative and outcomes of the initiative.*

The enterprise project governance process (now known as the Projects and Investments Workgroup) reviews all projects at initiation; recommends approval for execution; tracks quarterly status and changes, as well as reviewing projects at closeout. This project was tracked through its lifecycle with closeout and lessons learned information shared with the enterprise.

*Briefly outline an associated communications plan to educate users and/or promote awareness and adoption.*

The Governor’s Office highlighted Rules.iowa.gov at the weekly press conference and demonstrated the system. The Governor’s Office also issued an official press release. The OCIO has promoted the site through Twitter and contacted all high school government teachers about the system. The site was also promoted through the Iowa Association of Business and Industry.

## Significance

***Key Point: The project is consequential, relevant, and transformational for state government and/or constituents.***

*Define the scope of the initiative and beneficiaries/stakeholder groups.*

The scope of the project was to allow a convenient, consistent manner for submission of feedback about proposed Administrative Rules and allowing submissions to be linked to specific rule sections. While scope is clear and straightforward, the impact is significant because prior to the system implementation, each agency had its own commenting process. It was not clear to citizens how to submit their comments or what the timetable was for submission.

Stakeholders include:

114 State agency rule-making staff  
Citizens, Business and Industry Associations  
Governor and Legislature

The site supports the commenting on rules for 114 organizations (departments, boards and commissions). Comments submitted on the site are automatically sent to the organization's rule coordinator.

## Impact

***Key Point: The project leads to substantial and measureable change; it makes state government better.***

The impact of the new site can be best described by feedback from citizens with a local blogger

(desmoinesdem) reporting: *“Fantastic new resource launched on Iowa Administrative Rules”*

“Iowa policy wonks have every reason to be discouraged lately about the frozen-in-place, do-little state legislative session. Looking on the bright side, a fantastic new resource on state administrative rules appeared this week.

The Office of the Chief Information Officer launched the Iowa Administrative Rules website on Monday. The site is easy to navigate. A FAQ page explains the basics about the rulemaking process and public comments. Rules currently open for comments are right there on the front page. Clicking on any specific rule brings up the full text, contact information for the relevant state agency, details on upcoming public hearings, and the closing date for comments on the proposal. This website should make it easier for politically-engaged Iowans to understand and participate in making state regulations.”

The Governor anticipates the impact of the site will be more understandable and ultimately fewer rules, as citizens engage to provide feedback.

*Describe the benefits and the impact of the benefits for both the nominating agency and constituents, such as services to constituents, operational improvements, security and/or privacy, transparency of government, and transformation of government.*

#### THE BENEFITS TO CITIZENS INCLUDE:

A centralized location to view and comment on proposed rules.

Consistent commenting process - citizens don't need to figure out how comments are submitted from agency to agency.

Easily identifiable commenting deadline - graphic of the number of days remaining to comment reduces the chance a citizen would miss a comment deadline.

Easy to use index of agency contacts, websites and rules - this centralized directory did not exist before as information was spread out across 114 organizations and information may have been difficult to locate on the organizations website.

#### THE BENEFITS TO RULE MAKERS IN THE STATE INCLUDE:

Automatic posting to Rules site for public commenting - no extra steps are needed by rule-making staff to get the rule published to the site! Agencies do not need to take any special action to make their rules available for comment because the integration of the public commenting and legislative rule sites supports the automatic posting.

Commenting by section reduces confusion about the context of the comment submitted.

**Summary:** <https://rules.iowa.gov> offers citizens, businesses and interest groups the opportunity to engage and provide feedback about rules on a 24 x 7 basis. Providing feedback is now a consistent process across the enterprise. Feedback can be more easily understood by the agency, with commenting identified by rule section. Citizens are engaging in the rule making process by visiting the site, reading the rules (average of 10 minutes per visitor) and commenting on rules!

In addition to benefiting Iowans, the **OCIO is willing to make source code available to other jurisdictions.** The site was developed using best practices for software development and current

technology, allowing the site to be easily maintained and enhanced. Using Microsoft's Model View Control (MVC5) architecture with Entity5 for access to the MS SQL Server will allow the application code to be easily modified by other state administrative rule organizations.