

THE ADMINISTRATIVE RULES REVIEW COMMITTEE

2011 Annual Report

I. INTRODUCTION - State Administrative Agencies

The rulemaking process of Iowa Code chapter 17A only applies to executive branch state agencies. Accordingly, agencies housed within either the legislative or judicial branches of state government are not considered in this report.

Iowa Code chapter 7E refers to departments, divisions within departments, independent agencies, and separate constitutional offices; however, there is no overarching structure to Iowa state government. For example, the Department of Commerce has no independent duties other than coordination between its various divisions, which operate independently. Similarly, the Department of Inspections and Appeals is a large regulatory agency; however, it also houses the Racing and Gaming Commission, which is an agency with its own significant regulatory responsibilities and operates largely independently from the Department.

As a practical matter, it is best to define an “agency” as a policy-making body and ignore statutory designations. Using this broad definition there are 125 executive branch administrative agencies: 21 umbrella departments, 46 semi-autonomous divisions, bureaus, and entities within those departments, 27 licensing boards, 26 independent agencies, and 4 separate constitutional offices. The Governor as an individual is excluded from this list because the state’s chief executive is exempt from the rulemaking process; however, any agency housed within that office is subject to the rulemaking process.

II. OVERVIEW OF 2011 RULEMAKING

This report covers the final rulemaking actions in calendar year 2011, published in the Iowa Administrative Bulletin from January through December 2011. The Administrative Rules Review Committee (“Committee”) *generally* reviews rules published the month previous to the Committee’s monthly meeting. Accordingly, this publication period covers the Committee’s February 2011 meeting through its January 2012 meeting.

In 2011, rule adoptions declined by 25%, with

56 agencies adopting 310 filings. The 2011 filings are detailed by agency and by month in Appendix A. As always, the Department of Human Services leads the list with 55 filings (down from 88 filings in 2010). 29 of these 56 agencies adopted only one or two filings.

Rulemaking filings generally contain more than a single rule change. The 310 filings actually represent about 1500 individual rule additions, amendments, or repeals. Rulemaking activity for the last 10 years is as follows:

YEAR	AGENCIES	FILINGS	YEAR	AGENCIES	FILINGS
2011	56	310	2006	58	440
2010	52	427	2005	54	396
2009	56	473	2004	56	420
2008	52	468	2003	54	435
2007	51	446	2002	59	523

In 2011, 19 agencies adopted 60 filings using the “emergency” rulemaking provisions of the rulemaking process (Iowa Code §§ 17A.4 and 17A.5). This number is a significant decrease from the 113 emergency filings in 2010. Virtually all of the emergency filings were “double barreled”, i.e., published as a notice of intended action at the same time the notice of emergency rulemaking is published. In 2011, emergency rulemaking filings account for only 18 percent of the total filings. The 10-year history for emergency rulemaking is as follows:

YEAR	EMERGENCY	FILINGS	YEAR	EMERGENCY	FILINGS
2011	60 (18 percent)	310	2006	65 (14 percent)	440
2010	113 (26 percent)	427	2005	72 (18 percent)	394
2009	100 (21 percent)	473	2004	59 (14 percent)	420
2008	98 (21 percent)	468	2003	73 (17 percent)	435
2007	93 (21 percent)	446	2002	64 (13 percent)	523

To calculate the volume of rulemaking, only *filed* documents are counted, either through the normal process or through emergency rulemaking. Individual rule changes contained within each document are not counted. If notices were included, the volume of rulemaking would virtually double. Each filing put into effect contains one or more individual rule changes; on the average each filing contains approximately four individual changes. The 2011 rulemaking filings are broken down by month on the top line of the following chart, which tracks the previous ten years:

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	TOTAL
2011	16	26	15	26	26	28	21	25	27	25	47	28	310
2010	30	35	34	42	40	44	23	35	39	22	41	42	427
2009	32	32	27	31	33	36	85	28	46	36	38	49	473
2008	51	20	10	30	17	26	98	31	34	40	49	62	468
2007	36	33	14	26	25	30	38	80	26	62	32	44	446
2006	26	54	41	27	39	32	51	39	11	59	35	26	440
2005	23	39	15	09	23	33	80	32	24	19	54	45	396
2004	28	32	39	28	27	34	41	20	67	33	43	28	420
2003	20	41	39	23	31	25	38	44	35	48	38	53	435
2002	39	52	43	45	56	33	32	52	57	49	35	30	523
2001	34	44	23	31	43	19	36	23	34	60	21	51	419
2000	19	29	22	28	22	34	23	38	34	56	45	17	367
1999	14	51	29	26	111	45	35	29	44	33	28	61	506

III. MAJOR ITEMS BEFORE THE COMMITTEE

The number of formal actions taken by the Committee has remained at a steady level. One objection was imposed in 2011, a level similar to the previous five years. One session delay was imposed and five 70-day delays were imposed. The Committee also

approved two general referrals and two requests for a regulatory analysis. The Committee submitted one bill request.

IOWA FINANCE AUTHORITY, *Low-income Tax Credit Program*, 11/2/11 IAB, ARC 9837B, NOTICE

Background. These amendments replace the 2011 qualified allocation plan (QAP) for the Low-income Housing Tax Credit Program with the 2012 QAP, which is incorporated by reference in the rulemaking. The 2012 QAP sets forth the purpose of the plan, the administrative information required for participation in the program, the threshold criteria, the selection criteria, the post-reservation requirements, the appeal process, and the compliance monitoring component.

The plan also establishes the fees for filing an application for low-income housing tax credits and for compliance monitoring

Commentary. An Iowa Finance Authority (IFA) representative explained the process of transitioning from the 2011 QAP to the 2012 QAP. Public comment was heard from stakeholders in the affordable housing industry who raised several concerns about the changes made to the QAP. Stakeholders asserted that an unprecedented change to the QAP criteria had been made in 2009 without explanation. That change resulted in the loss of credit points for certain projects for which the tax credit was sought. The change was a new specification that tax abatements, but not tax exemptions, would be considered among the criteria, when no basis for such a distinction is found in statute and both are relevant to the localized purposes of the tax credit. Stakeholders also asserted that the tax credit had been awarded increasingly to projects in urban areas over rural areas, and that all available funds for the tax credit were not being used every year due to the changes in criteria.

The IFA representative replied that IFA's decisions on these matters were based on "precatory" (i.e., nonbinding) principles found in statute, so changes to the QAP criteria need not be specified in the statute. The representative asserted that tax exemptions are not localized in nature, and as such, should not be considered for the purposes of awarding the tax credit, which is intended to encourage local communities to have a financial stake in projects funded by the tax credit. The representative admitted that the tax credit has increasingly been awarded to urban areas, but noted that IFA has been attempting to address this disparity through a different project.

The stakeholders disagreed with the IFA representative's assertion that tax exemptions are not local in nature, noting that decisions regarding tax exemptions are made by local assessors who choose to give up that revenue, as is the case with tax abatements, which are included in the QAP criteria. The representative replied that tax exemptions are the result of decisions made by the General Assembly, not by local authorities, regardless of who ultimately approves them. Committee members noted that tax exemptions are statutory, and not discretionary on the part of local authorities in the manner provided by tax abatements and other factors included in the QAP. Other committee members asked what precisely determines which factors not listed in statute are included in the QAP criteria. The representative replied that these decisions are generally guided by federal law.

Action. No action taken.

EDUCATION DEPARTMENT, *Child Abuse Reports—Duties of School Authorities*, 10/5/11 IAB, ARC 9794B, NOTICE.

Background. This proposed rulemaking conforms the department's rules to 2011 Iowa Acts, H.F. 645, §95, which requires certain duties of the board of directors of a school district and the authorities in charge of an accredited nonpublic school when an employee is under investigation for an allegation of abuse under the department's rules and when a finding is made that an employee's conduct constitutes a crime. The duties include placing a school employee who is the subject of an investigation of an alleged incident of physical or sexual abuse on administrative leave once an investigator has determined that a written complaint is investigable and reporting the results of an investigation that finds that the school employee's conduct constitutes a crime to the Board of Educational Examiners.

Commentary. A department representative explained the purpose of the rulemaking, which implements a statutory change of Iowa Code § 280.17 from the 2011 Legislative Session. Committee members expressed concern about the lack of standards as to what sort of evidence might be used against a school employee investigated under the rule and as to how much authority is granted to an investigator. Committee members also noted the possible stigma a school employee who is the subject of an investigation might face, even if the allegations later prove to be unfounded. The representative stated that a process and standards for investigations are set out in accordance with the statute. A motion was made to refer the rulemaking to the General Assembly for further consideration. The motion carried.

Action. General referral to the General Assembly.

PUBLIC EMPLOYMENT RELATIONS BOARD, *Decertification Elections*, 10/05/11 IAB, ARC 9795B, NOTICE.

Background. Longstanding Public Employment Relations Board (PERB) rules provide that in a decertification election, which determines whether a union will continue as the exclusive representative of a particular bargaining unit, a tie vote

results in the union continuing as the bargaining unit's representative. Tie votes have in fact occurred, as recently as 2011, and in accord with the existing rule, the union's exclusive representation has continued. Under this proposed rule, if a tie vote occurs, the union would be decertified (i.e., not continue) as the representative of the bargaining unit.

Commentary. A board representative stated that the current rule is a misapprehension of the statutory scheme. The representative noted that a central precept of labor law is the principle that a majority of the bargaining unit must support unionization, and for that reason a tie vote reveals that a majority of the unit does not support unionization and the union should be decertified. The representative stated that the issue had first been identified years ago, but that a tie vote, occurring last year, provided the impetus for the rulemaking. Union representatives expressed their support for the current rule, stating that traditionally, a majority vote is needed to pass any action.

Committee members expressed concern on two points. First, some members noted that the statute refers only to majority votes, with no mention of tie votes. Other members were concerned that a policy of such long standing could be changed through administrative rule; these members felt the issue should be addressed through the

legislative process. A member moved to refer this proposal to the General Assembly. Such a motion would refer the issue to the General Assembly for further study, but would not affect the adoption of the rule. After discussion, the members determined to postpone any further action until the rule is adopted in final form.

Action. No action taken. Rule was never finalized.

ADMINISTRATIVE SERVICES DEPARTMENT, *Definition of “Confidential” Employees, 9/07/11 IAB, ARC 9738B, NOTICE.*

Background. This proposal is a general re-write of the department’s information technology and personnel rules; at issue in this large rulemaking is the definition of the term “confidential employee.” A confidential employee is exempt from the merit employment system and is an “at will” employee.

Commentary. The current, highly detailed rule defines the term “confidential employee” based on the function of the employee. The proposed new definition is based upon the definition of “confidential employee” in Iowa Code §20.3, relating to collective bargaining. This definition is broad and could have the effect of making many additional employees, including human resources employees, who are currently under the merit employment system, exempt from its coverage and protection. The proposed definition would include:

“...any public employee who works in the personnel offices of a public employer or who has access to information subject to use by the public employer in negotiating or who works in a close working relationship with public officers or representatives associated with negotiating on behalf of the public employer.”

Department representatives stated that the intent of this change is to have a single definition of the term “confidential employee” by incorporating the Iowa Code definition. They stated that there was no intention on the part of the department to alter the employment status of any employees. The representatives stated that the definition, as set out in the notice, would not be adopted, but offered no alternatives at this point.

A number of human resources employees attended the meeting and contended that it is not appropriate to use the Iowa Code Chapter 20 definition, which relates specifically to collective bargaining. They also stated that the purpose of Iowa Code Chapter 20 is to establish and define which public employees could or could not participate in employee organizations and could or could not be represented through the collective bargaining process—nothing more. They expressed concern that the new definition would result in a loss of their merit status. They also alleged a number of irregularities in the rulemaking process itself.

Committee members also expressed concern about this proposal, questioning whether this change offers any public benefit. Members asked how many employees would be affected by this change, and the department representatives stated that figure is not known at this time. Members asked the department to keep them updated on any changes made to this item before the rulemaking returns to the Committee for further review.

Action. No action taken. This definition was never adopted.

IOWA FINANCE AUTHORITY, *Iowa Jobs Program—Calculation of Jobs Created, 8/24/11 IAB, ARC 9691B, ADOPTED.*

Background. In this rulemaking, the Iowa Finance Authority (IFA) seeks to exclude temporary positions from the reporting requirements for the Iowa Jobs Program.

Commentary. An IFA representative explained the purpose of the amendment and noted that no changes had been made after the public comment period. Committee members asked why temporary jobs are not being counted for this program when they are counted in certain other contexts. The representative explained that the enacting legislation was not specific on this point, but that it was IFA's understanding that only full-time jobs were meant to be counted. Committee members asked what precisely a permanent job is, and how the definition might apply in contexts such as temp agency jobs and construction jobs. The representative stated that "permanent" is not defined, and expressed uncertainty as to how it might be applied in such situations. Committee members asked how a person who worked on two projects through the program might be counted, and if double counting could occur. The representative stated that double counting might be possible, as IFA does not have the resources to conduct audits in this area.

Action. A motion was made for the Committee to object to the rulemaking, based on the Committee's belief that it is unreasonable to exclude temporary jobs created through the program from these calculations. The motion carried.

HUMAN SERVICES DEPARTMENT, *Medicaid Filings, EMERGENCY ADOPTION.*

Background. Each year the Department of Human Services (DHS) is authorized in statute to adopt a variety of changes to the Medicaid program on an "emergency" basis, with the proviso that the changes be reviewed by the Administrative Rules Review Committee before they are effective. The 2011 legislation, H.F. 649, stated in part:

20. a. The department may implement cost containment strategies recommended by the governor, and may adopt emergency rules for such implementation.
- b. The department shall not implement the cost containment strategy to require a primary care referral for the provision of chiropractic services.

Due to the extended legislative session, the timeframe for the drafting and review of these Medicaid rules was significantly restricted; 13 rule filings were sent to the Committee for review at the August meeting. Most had a September 1 effective date. These filings are summarized as follows:

1. Chapter 75, Medicaid. Allow liens to recover Medicaid expenses for services involving malpractice.
2. Chapter 78, Medicaid. Eliminate coverage for weight-loss drugs and limit coverage of drugs for symptomatic relief of cough and cold.
3. Chapter 78, Medicaid. Restrict coverage of orthodontia for children.
4. Chapter 78, Medicaid. Limit payment for durable equipment under an HCBS waiver to the amount paid for fee-for-service Medicaid.

5. Chapter 79, Medicaid. Increase reimbursement rates for home- and community-based waiver services.
6. Chapter 79, Medicaid. Increase pharmacy dispensing fee.
7. Chapter 79, Medicaid. Increase reimbursement rates for non-state-owned psychiatric medical institutions for children.
8. Chapter 79, Medicaid. Eliminate graduate medical education payments for out-of-state hospitals.
9. Chapter 79, Medicaid. Eliminate payment for treatment of a hospital-acquired condition.
10. Chapter 79, Medicaid. Reduce physician payment for services provided in a facility setting.
11. Chapter 79, Medicaid. Implement emergency room copayment and reduce Medicaid payment when service is nonemergency and patient is not referred by another provider.
12. Chapter 80, Medicaid. Require new forms for paper billing of Medicare crossover claims.
13. Chapter 81, Medicaid. Update procedures for federal nursing facility preadmission screening and evaluation of patients with mental retardation or mental illness.

Commentary. A department representative discussed each of the rule filings in turn.

Regarding the rule filing on coverage of orthodontia for children, Committee members expressed an interest in working with the department to find alternative sources of savings in the dental area in the future. It was estimated that 1,500 children would be affected by the coverage restriction. A representative of the Iowa Dental Association expressed concern over these funding cuts, and explained that the procedures in question are needed care and not merely cosmetic, and save money in the long run by reducing the need for future dental care.

For the filing increasing the reimbursement rates for home- and community-based waiver services, the department representative explained that the filing restores a previous cut in funding for these services. An industry representative expressed concern that the filing restores the funding to the capped rate in place in 2009. This would eliminate any rate changes made since that time, and would represent a significant financial hardship for some providers. Committee members asked why this issue had not been raised previously when the language in question was being discussed during the 2011 Legislative Session. It was thought at the time that the language would provide for the necessary funds. The industry representative suggested that the language used did not provide for the outcome desired by the Legislature. Committee members remained open to making further changes in the 2012 Legislative Session.

For the filing dealing with copayments for emergency room services, the department representative explained that the copayment would be \$3. Committee members sought clarification as to how that number was chosen, and whether it could be changed. The department representative explained that \$3 is the maximum amount that could be feasibly imposed under federal regulations. Committee members asked how the copayment would be collected and if it in fact would be collected. The department

representative explained that the fee would be a debt owed to the provider, and it would be the provider's responsibility to collect it.

Action. No action taken.

NATURAL RESOURCES DEPARTMENT, *Dove Season, 08/10/11, ARC 9674B, FILED EMERGENCY AFTER NOTICE.*

Background. 2011 Iowa Acts, S.F. 464, added the mourning dove to the list of game birds or animals for which the Natural Resource Commission may establish a hunting season. With this specific statutory authorization, in May 2011, the department proposed a 70-day season with a 30-bird possession limit; the notice did not propose to regulate method of take. The department conducted a public hearing at which many participants called for a requirement for the exclusive use of nontoxic shot. On adoption, the Natural Resource Commission did adopt a nontoxic shot requirement.

Commentary. Department representatives and stakeholders contended that the use of lead shot poses a health threat to humans eating doves and to scavenging animals who ingest the lead pellets. It was noted that most states that allow dove hunting have some type of requirement for nontoxic shot. Proponents of lead shot disputed allegations that lead shot poses any environmental threat and contended that nontoxic shot was an additional and unnecessary expense.

Committee members and the Governor's representative expressed concern that the nontoxic shot requirement did not appear in the notice of intended action. Department representatives contended that the requirement was added in response to significant public comment. Discussion centered on the extent to which a notice of intended action can be modified on final adoption. Both the Committee and the department agreed on the general principle that even substantial changes can be made to a notice of intended action as long as those changes are within the scope of the original notice and a logical outgrowth of the comments received on the proposal. However, the Committee and the department disagreed on whether the nontoxic shot requirement was within the scope of the original notice.

Both Committee members and the Governor's representative felt that a decision on nontoxic shot should be made by the Legislature. Committee members also noted that a nontoxic shot requirement was debated by the House of Representatives and was specifically voted down.

Action. The Committee imposed a session delay on the portion of the rule which imposes a nontoxic shot requirement. The committee later approved a resolution to nullify that portion of the rule, which did not pass during the 2012 General Assembly. That portion of the rule was rescinded by Governor Branstad after the adjournment of the 2012 General Assembly.

NURSING BOARD, *Picc lines service by licensed practical nurses (LPN), 01/12/11 IAB, ARC 9329B, FILED.*

Background. A PICC line is a long, slender, small, flexible tube that is inserted into a vein and advanced near the heart to obtain intravenous access. It is often used to administer medications over a period of time. This filing would allow an LPN to add intravenous solutions and perform other duties on these lines, under the supervision of a registered nurse.

Commentary. Nursing Board representatives stated this new duty for an LPN is especially beneficial to residents in care facilities because it allows these lines to be left in place while the resident remains in the facility and the solutions to be easily replenished. The rule was supported by the Iowa Nurses Association. The representatives noted that PICC lines were often the optimal choice for administering certain medications.

However, this new duty was opposed by registered nurses who contended that it is unsafe to delegate this duty to an LPN. They contend that the addition of solutions carries some risk of infection or even allergic reaction, and that an LPN is not adequately trained to safely perform this duty or deal with any problems. The registered nurses also contended that it is improper to require a registered nurse to supervise the LPN performing this duty; the nurses expressed concern that they would be held legally responsible for any harm resulting from the actions of the LPN; they doubted that a registered nurse could, in fact, refuse an order to provide the supervision. They also noted that the supervision requirement did not even require the registered nurse to be physically present.

Action. General referral to the General Assembly.

HUMAN SERVICES DEPARTMENT, *Home and Community-based Services: Respite Care*, 03/9/11 IAB, ARC 9403B, 70-DAY DELAY.

Background. Respite care is a Home and Community-based Service provided to a parent or other family member who serves as an unpaid primary caregiver. Respite is necessary for families who provide constant care for seriously handicapped family members. It allows family members to receive periods of relief for vacations, holidays, and scheduled periods of time off. These provisions were reviewed at the Committee's April meeting and a 70-day delay was imposed.

Commentary. The rules provide that respite care cannot be utilized during the hours the primary caregiver is working; essentially the rule ends payments for day camps for these disabled children. Department representatives contended this rulemaking was merely a clarification of current federal requirements, and that local case managers had been improperly approving respite care requests. The representatives stated that federal regulation provides that respite care cannot be used as an alternative to day care, and that if the caregiver is at work, then respite care is a form of day care, which cannot be reimbursed using Medicaid funds. Department representatives noted that a continuation of respite day care could only be accomplished with 100 percent state funding and would almost certainly lead to increased participation and cost.

Affected parents actively opposed this rule change, contending that summer day camps are not merely day care, instead providing one of the few outdoor recreational activities available to these persons with disabilities.

The Committee was split on this issue; some members favored a session delay, in order to preserve the program through the Summer of 2011, while other members expressed concern that federal Medicaid auditors could contest the policy and demand repayment of federal funds.

Action. 70-day delay. A letter was sent to Iowa's congressional delegation expressing the Committee's concern over this federal policy. In August 2011, Governor Branstad

requested the department withdraw this rule filing, and the department complied with the request.

APPENDIX A—SUMMARY OF RULEMAKING IN 2011

Agency name	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept	Oct.	Nov.	Dec	tot
HUMAN SERVICES DEPARTMENT[441]		3	3	3	5	5		5	17	2	12		55
Professional Licensure Division[645]	1		3		4	2	2	2	1	1	2	8	26
PUBLIC HEALTH DEPARTMENT[641]		4		3		4	3	1		4	4		23
Pharmacy Examiners Board[657]			7		1	1			1	5		4	19
Natural Resource Commission[571]	1				1	5		6	3				16
EDUCATION DEPARTMENT[281]		4		6								5	15
Educational Examiners Board[282]		4		3		1		1	1		3	1	14
Iowa Finance Authority[265]				1	1		2	2		3	3	1	13
PUBLIC SAFETY DEPARTMENT[661]							3	1		3	3		10
ECONOMIC DEVELOPMENT DEPARTMENT [261]	1			1	2			1	2		2		9
Regents [681]		1								1	6		8
SECRETARY OF STATE[721]				2		1				1	4		8
AGRICULTURE AND LAND STEWARDSHIP DEPARTMENT[21]		2		1		1		1				1	6
Environmental Protection Commission[567]	2	1										2	5
Real Estate Commission[193E]				1	1		1	1				1	5
Utilities Division[199]					2				1		2		5
Accountancy Examining Board[193]	1				2			1					4
Aging, Department On[17]		1				1					2		4
Insurance Division[191]					2		1					1	4
Medicine Board[653]	1						3						4
School Budget Review Committee[289]	4												4
TRANSPORTATION DEPARTMENT [761]		1			1						2		4
College Student Aid Commission[283]		3											3
Engineering and Land Surveying Examining Board[193C]				1		1				1			3
INSPECTIONS AND APPEALS DEPARTMENT[481]			1		1		1						3
REVENUE AND FINANCE DEPARTMENT[701]			1	1						1			3
State Public Defender [493]				1		1						1	3
Banking Division[187]						1		1					2
City Development Board[263]						1		1					2
Labor Services Division[875]	1									1			2
Underground Fund Board [591]							2						2

Accountancy Examining Board[193]					1			1					2
Aging, Department On[17]						1					1		2
AGRICULTURE AND LAND STEWARDSHIP DEPARTMENT[21]				1		1							2
Banking Division[187]						1							1
City Development Board[263]								1					1
Historical Division[223]							1						1
Insurance Division[191]							1						1
Lottery Authority, Iowa[531]							1						1
Pharmacy Examiners Board[657]									1				1
PUBLIC SAFETY DEPARTMENT[661]							1						1
Racing and Gaming Commission[491]												1	1
VETERANS AFFAIRS DEPARTMENT [801]				1									1
Workers' Compensation Division[876]						1							1
Monthly Total				4	6	7	9	6	18	2	7	1	60

APPENDIX C: IOWA AGENCIES

The Reorganization Act of 1986 (Iowa Code Chapter 7E) established most of Iowa's state agencies in a number of umbrella departments, with divisions, bureaus, sections, and units as subunits of a department. In addition to these departments, a variety of independent agencies are also established. Iowa Code chapter 7E defines a variety of agencies which include:

- An authority which is a body with independent power to issue and sell bonds.
- A board which has policymaking powers and the power to hear contested cases.
- A commission which has rulemaking powers.
- A committee which is appointed to study a specific problem and terminate on the completion of its assignment.
- A council which is an advisory body.
- A licensing board which sets standards of professional competence and conduct for a profession or occupation under its supervision.

ADMINISTRATIVE SERVICES DEPARTMENT[11]
AGING, DEPARTMENT ON[17]
AGRICULTURE AND LAND STEWARDSHIP DEPARTMENT[21]
Agricultural Development Authority[25]
Soil Conservation Division[27]
ATTORNEY GENERAL[61]
AUDITOR OF STATE[81]
BEEF INDUSTRY COUNCIL, IOWA[101]
BLIND, DEPARTMENT FOR THE[111]
CAPITAL INVESTMENT BOARD, IOWA[123]
CITIZENS' AIDE[141]
CIVIL RIGHTS COMMISSION[161]
COMMERCE DEPARTMENT[181]
Alcoholic Beverages Division[185]

Banking Division[187]
Credit Union Division[189]
Insurance Division[191]
Professional Licensing and Regulation Bureau[193]
Accountancy Examining Board[193A]
Architectural Examining Board[193B]
Engineering and Land Surveying Examining Board[193C]
Landscape Architectural Examining Board[193D]
Real Estate Commission[193E]
Real Estate Appraiser Examining Board[193F]
Interior Design Examining Board[193G]
Savings and Loan Division[197]
Utilities Division[199]
CORRECTIONS DEPARTMENT[201]

Parole Board[205]
CULTURAL AFFAIRS DEPARTMENT[221]
Arts Division[222]
Historical Division[223]
ECONOMIC DEVELOPMENT, IOWA
DEPARTMENT OF[261]
City Development Board[263]
IOWA FINANCE AUTHORITY[265]
EDUCATION DEPARTMENT[281]
Educational Examiners Board[282]
College Student Aid Commission[283]
Higher Education Loan Authority[284]
Iowa Advance Funding Authority[285]
Libraries and Information Services Division[286]
Public Broadcasting Division[288]
School Budget Review Committee[289]
EGG COUNCIL, IOWA[301]
EMPOWERMENT BOARD, IOWA[349]
ENERGY INDEPENDENCE, OFFICE OF[350]
ETHICS AND CAMPAIGN DISCLOSURE BOARD,
IOWA[351]
EXECUTIVE COUNCIL[361]
FAIR BOARD[371]
HUMAN RIGHTS DEPARTMENT[421]
Community Action Agencies Division[427]
Criminal and Juvenile Justice Planning
Division[428]
Deaf Services Division[429]
Persons With Disabilities Division[431]
Latino Affairs Division[433]
Status of African-Americans, Division on the[434]
Status of Women Division[435]
Status of Iowans of Asian and Pacific Islander
Heritage[436]
HUMAN SERVICES DEPARTMENT[441]
INSPECTIONS AND APPEALS
DEPARTMENT[481]
Employment Appeal Board[486]
Foster Care Review Board[489]
Racing and Gaming Commission[491]
State Public Defender[493]
IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM[495]
LAW ENFORCEMENT ACADEMY[501]
LIVESTOCK HEALTH ADVISORY COUNCIL[521]
LOTTERY AUTHORITY, IOWA[531]
MANAGEMENT DEPARTMENT[541]
Appeal Board, State[543]
City Finance Committee[545]
County Finance Committee[547]
NATURAL RESOURCES DEPARTMENT[561]
Energy and Geological Resources Division[565]
Environmental Protection Commission[567]
Natural Resource Commission[571]
Preserves, State Advisory Board for[575]
PETROLEUM UNDERGROUND STORAGE TANK FUND
BOARD, IOWA COMPREHENSIVE[591]
PREVENTION OF DISABILITIES POLICY COUNCIL[597]
PROPANE EDUCATION AND RESEARCH COUNCIL,
IOWA[599]
PUBLIC DEFENSE DEPARTMENT[601]

Homeland Security and Emergency Management
Division[605]
Military Division[611]
PUBLIC EMPLOYMENT RELATIONS
BOARD[621]
PUBLIC HEALTH DEPARTMENT[641]
Professional Licensure Division[645]
Dental Board[650]
Medicine Board[653]
Nursing Board[655]
Pharmacy Board[657]
PUBLIC SAFETY DEPARTMENT[661]
RECORDS COMMISSION[671]
REGENTS BOARD[681]
Archaeologist[685]
REVENUE DEPARTMENT[701]
SECRETARY OF STATE[721]
SHEEP AND WOOL PROMOTION BOARD, IOWA[741]
TELECOMMUNICATIONS AND TECHNOLOGY
COMMISSION, IOWA[751]
TRANSPORTATION DEPARTMENT[761]
TREASURER OF STATE[781]
TURKEY MARKETING COUNCIL, IOWA[787]
UNIFORM STATE LAWS COMMISSION[791]
VETERANS AFFAIRS, IA DEPARTMENT of[801]
VETERINARY MEDICINE BOARD[811]
VOLUNTEER SERVICE, IOWA COMMISSION ON[817]
VOTER REGISTRATION COMMISSION[821]
WORKFORCE DEVELOPMENT
DEPARTMENT[871]
Labor Services Division[875]
Workers' Compensation Division[876]
Workforce Development Board and
Workforce Development Center
Administration Division[877]