

Red Tape Review Rule Report

(Due: September 1, 2025)

Department Name:	Iowa Division of Banking	Date:	August 13, 2025	Total Rule Count:	3
IAC #:	187	Chapter/ SubChapter/ Rule(s):	8	Iowa Code Section Authorizing Rule:	Chapter 524
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PLEASE NOTE, THE BOXES BELOW WILL EXPAND AS YOU TYPE

What is the intended benefit of the rule?

The intended benefit of the rule is to identify credit rating services the superintendent has approved as required by Iowa Code section 12B.10 and to give state banks certainty about the eligibility to provide courier services for customers. It also defines the term bank to add clarity for parties reading Iowa Code chapter 524.

Is the benefit being achieved? Please provide evidence.

Iowa Code chapter 524 includes a comprehensive and updated definition of the term “bank”, so the benefit of this definition is no longer being achieved. The rule continues to provide guidance to all parties interested in identifying approved rating services as required by Iowa Code section 12B.10 and for state banks interested in providing courier services.

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

There are no costs incurred by the public to comply with the rule.

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

The rule does not impose any costs on the Division to implement or enforce.

Do the costs justify the benefits achieved? Please explain.

The identification of approved rating services is still required by statute (Iowa Code section 12B.10), and the guidance regarding state banks wishing to provide courier services continues to meet its intended benefit, at no cost to the state or the public. The definition of bank is no longer necessary and the Division proposes to repeal it.

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.

The Division has identified the list of approved rating services issued by the federal Securities and Exchange Commission as being less restrictive than the present rule and proposes to incorporate the less restrictive language.

Does this chapter/rule(s) contain language that is obsolete, outdated, inconsistent, redundant, or unnecessary language, including instances where rule language is duplicative of statutory language?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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Yes, the chapter contains language that duplicates statutory language and includes other unnecessary or outdated language as noted herein:

8.9 General definition of bank: Contains unnecessary language as the term is defined in the statute.

8.10 Courier services: Contains some unnecessary language and Division proposes to consolidate this into a different rules chapter.

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

The Division proposes to repeal two rules in this chapter and incorporate portions of one of them (8.10) into chapter 2 regarding bank applications to establish mobile offices and/or courier services.

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

CHAPTER 8

APPROVED RATING SERVICES

Chapter exempt from chapter rescission pursuant to Iowa Code section [17A.7](#)

187—8.1(12B) Approved rating services. Rating services approved by the superintendent as provided by Iowa Code section [12B.10](#) for use by the treasurer of state and the treasurer of each political subdivision in

determining qualifying commercial paper investments include all nationally recognized statistical rating organizations registered with the Securities and Exchange Commission.

This rule is intended to implement Iowa Code section [12B.10](#).

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

METRICS

Total number of rules repealed:	2
Proposed word count reduction after repeal and/or re-promulgation	265
Proposed number of restrictive terms eliminated after repeal and/or re-promulgation	1

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

No.