


Government of the District of Columbia  
Office of the Chief Financial Officer



**Glen Lee**  
Chief Financial Officer

**MEMORANDUM**

**TO:** The Honorable Phil Mendelson  
Chairman, Council of the District of Columbia

**FROM:** Glen Lee  
Chief Financial Officer 

**DATE:** October 21, 2024

**SUBJECT:** Fiscal Impact Statement – Rulemaking Public Comment Modernization  
Amendment Act of 2024

**REFERENCE:** Bill 25-790, Draft Committee Print as provided to the Office of Revenue  
Analysis on October 8, 2024

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**Conclusion**

Funds are not sufficient in the fiscal year 2025 through fiscal year 2028 budget and financial plan to implement the bill. The bill will cost \$35,000 in fiscal year 2025 and \$95,000 over the four-year budget and financial plan.

**Background**

The bill requires the Office of Documents and Administrative Issuances (ODAI) within the Office of the Secretary to accept electronic submissions of comments and documents related to rules that are to be published in the District of Columbia Register. Current law<sup>1</sup> only requires the acceptance of oral and written materials.

The bill also requires ODAI to publish and maintain an electronic directory of all proposed rules open for public comment.

**Financial Plan Impact**

Funds are not sufficient in the fiscal year 2025 through fiscal year 2028 budget and financial plan to implement the bill. ODAI will require an estimated \$35,000 in fiscal year 2025 and \$95,000 over the four-year financial plan for information technology costs associated with creating an electronic

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<sup>1</sup> D.C. Official Code § 2-505(a).

The Honorable Phil Mendelson

FIS: Bill 25-790, "Rulemaking Public Comment Modernization Amendment Act of 2024," Draft Committee  
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directory portal of proposed rules open for public comment, and for post-implementation maintenance and updates of the directory.

ODAI is already capable of accepting electronic submission of comments and documents, so that requirement does not have a cost.

<b>Rulemaking Public Comment Modernization Amendment Act of 2024</b>					
<b>Fiscal Year 2025 – Fiscal Year 2028</b>					
<b>(\$ thousands)</b>					
	<b>FY2025</b>	<b>FY2026</b>	<b>FY2027</b>	<b>FY2028</b>	<b>Total, FY2025- FY2028</b>
Directory portal planning development & implementation	\$35	\$0	\$0	\$0	\$35
Post-implementation maintenance, updates, and technical support	\$0	\$20	\$20	\$20	\$60
<b>Total</b>	<b>\$35</b>	<b>\$20</b>	<b>\$20</b>	<b>\$20</b>	<b>\$95</b>