

Red Tape Review Rule Report

(Due: September 1, 20 26)

Department Name:	Iowa Racing and Gaming Commission	Date:	7/15/26	Total Rule Count:	29 rules in chapter 6
IAC #:	491	Chapter/ SubChapter/ Rule(s):	6	Iowa Code Section Authorizing Rule:	99D.2, 99D.7, 99D.8A, 99E.3, 99E.4, 99F.1, 99F.4, 99F.4B, 99F.6, 99F.17, 99F.17A
Contact Name:	Barb Blake	Email:	barb.blake@iowa.gov	Phone:	515-281-7355

PLEASE NOTE, THE BOXES BELOW WILL EXPAND AS YOU TYPE

What is the intended benefit of the rule?

Chapter 6 establishes licensing standards, requirements, and procedures for all types of occupational and vendor licenses the Commission issues. The chapter benefits those seeking to obtain or maintain these types of licenses by making clear what is required, what may lead to license denial or other administrative action, and what standards and procedures apply.

Is the benefit being achieved? Please provide evidence.

Yes. The Commission issued or renewed over 2800 occupational, vendor, manufacturer, or distributor licenses in 2025. By contrast, a much lower number of license applications were denied or otherwise not processed. This indicates the requirements and licensing standards are not unduly burdensome for applicants. It also indicates that Commission staff are exercising their discretion with each license application they review.

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

The costs do not fall on the public overall, but on specific applicants for a license. Those applicants must pay a modest application fee to submit the application and may incur costs in the form of time to collect all necessary documents and other information necessary for Commission staff to make a decision on the application.

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

The primary cost to the agency to implement and enforce chapter 6 is the personnel cost for staff who are responsible for collecting license applications, interviewing applicants, reviewing all information about the applicant and application, and making a decision whether to grant the license application.

If a license application is denied and the applicant appeals, the agency may also incur a cost to the Iowa Department of Inspections, Appeals, & Licensing Administrative Hearings Division for the cost of an administrative law judge to hear the appeal.

Do the costs justify the benefits achieved? Please explain.

Yes. The costs are necessary to ensure that all participants in the Iowa gaming industry have been upholding and will continue to uphold a high standard of integrity. This is particularly true in the racing industry, where many participants (including jockeys, owners, and trainers) are licensed both in Iowa and in other states.

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.

In recent years, the Iowa Legislature and the Commission have already made the licensing provisions less restrictive by eliminating an entire class of occupational licenses. This has reduced the costs of applicant compliance with the chapter by reducing the amount of licensing fees imposed and collected, and has also benefited facility licensees by widening the pool of candidates for certain positions that do not require licensure through the Commission.

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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Some definitions are duplicative of statute. These are proposed for removal. Other portions of chapter 6 that duplicate a statute are either proposed for removal or proposed for revision to be simpler, shorter, and refer back to the statute itself.

Some rules or subrules had been previously rescinded but not officially removed from the chapter. These rules or placeholders can now be removed.

Some language in the chapter set requirements or standards only for those involved in greyhound racing. Because live greyhound racing has not taken place in Iowa since 2022 and the Commission recently repealed its chapter 7 containing detailed rules for greyhound racing, these provisions in chapter 6 that apply only to greyhound racing are obsolete and proposed for removal.

Some language regarding jockey agents is now inconsistent with recent changes to the Commission's chapter 10 (addressing thoroughbred and quarter horse racing). The language in chapter 6 is proposed for removal, deferring to the new language that is now in chapter 10.

Finally, one rule (current 6.26) applies only to harness racing and sets requirements for licensure as a driver. Although harness racing continues to take place in Iowa, the Commission no longer oversees it. Accordingly, the driver rule is outdated and obsolete, and is proposed for removal.

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

6.2(1)(c)(1) through (6)—duplicative of statute, propose simplifying and referring to the statute
6.2(1)(f)—duplicative of statute
6.2(1)(h)—duplicative of statute
6.4(3)—duplicative of statute
6.12—previously rescinded, can be removed from chapter
6.14(4)—previously rescinded, can be removed from chapter
6.17(1)—obsolete (applies only to greyhound racing)
6.17(5)—previously rescinded, can be removed from chapter
6.18(11)—obsolete (applies only to greyhound racing)
6.18(12)—obsolete (applies only to greyhound racing)
6.25(2)—inconsistent with new chapter 10, propose removal and renumbering
6.26—outdated / obsolete (applies only to harness racing)

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

All other rules in chapter 6, with the chapter renumbered accordingly.

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

METRICS

Total number of rules repealed:	2, plus 12 additional subrules or subparagraphs
Proposed word count reduction after repeal and/or re-promulgation	1017 (9554 current word count; 8537 after repeal and re-promulgation)
Proposed number of restrictive terms eliminated after repeal and/or re-promulgation	78 “shall”; 1 “prohibit”; 7 “must”; 4 “require”

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

None related to chapter 6.