

## **HB5896**

Good Afternoon, Sen. Slossberg, Rep. Caruso & members of the Government Administration and Elections Committee my name is Pamela Booth and for the last 11 years I have been the Administrator for the Legislative Regulation Review Committee.

I come here this morning to strongly support HB 5896, AN ACT CONCERNING THE PUBLICATION OF STATE AGENCY REGULATIONS and to thank you for raising this legislation.

My Chair and I were delighted when we learned that the Governor had included in her budget funding for an e-regulations program, and I was personally very excited with the proposal because for the past ten years I have worked to promote an e-regulations program in Connecticut, knowing that we are now one of only four states in the country that has no on-line access to regulations.

This is beyond me. Why have we failed to make regulations a public access priority? We have the statutes, access to the entire legislative process, certain licensing, even the lotto numbers on line and yet we have not yet put at the public's fingertips that which rules many of their lives.

We believe that Connecticut's citizens have the right to on-line access to this information.

To that end, beginning last October there has been a working group of all of the major participants in the regulatory process and several of our most important end users meeting and gathering information as to what kind of an on-line system we need, where it should be located, what it would cost, who would maintain it and a variety of other such questions.

Putting The Regulations of State Agencies on line is good government. So many times I get calls from individuals who only know about a regulation after I have posted it on an agenda for the Regulation Review Committee. At that point they have lost their opportunity for input into the regulation, because public hearings are held at the agency level and the only notification of this opportunity to provide input is posted in the Connecticut Law Journal. How many of you who are not lawyers read the Connecticut Law Journal.

Unlike many states, Connecticut's regulatory process is complex and covers all branches of state government with the exception of the Comptroller's and the Treasurer's office.

Just briefly I'd like to walk you through the regulation process.

While the LRRC reviews regulations as a final step before regulations can go into effect they go through many steps prior.

1. Agencies post notice of intent to adopt regulations in the CT Law Journal. (Judicial Branches)

2. The public has a 30 day or more opportunity to comment either in person or in writing.
3. Agencies draft regulations. (Executive Branch)
4. The AG's office reviews for legal sufficiency.
5. Office of Policy Management reviews fiscal note
6. Interested parties are provided with final drafts and a packet arrives at the Regulation Review Committee.
7. Both LCO and OFA review and make recommendations to the LRRC
8. Committee meets and acts on the regulations.

When the LRRC finishes their work:

1. Approved regulations are returned to the agencies, who must file them with the Secretary of State's office, which is now the repository for the Official Legal Copy of all state regulations.
2. The Secretary of State's office forwards the regulations to the Commission on Official Legal Publications for publications in the Law Journal. (Judicial Branch)

As you can see this is a bit of a logistical nightmare and that's the short version. This entire process is currently paper driven. If you need a copy of a proposed regulation

you must find the right person at the agency and get a copy. If the regulation has reached LRRC we are happy to provide a copy for review.

So to begin to search for a logical solution, an e-solution, people from all of these groups have been meeting monthly to come up with a plan. In addition, we have visited the COLP's printing location in Enfield and had a focus group of end users work with a facilitator from DOIT.

Regulations are the backbone of many of the programs that you as legislators have made law and the public has the right to easy access to them, but let's not just throw money at the problem. We must move forward in a thoughtful manner, providing an e-system that can grow with the needs of its users and the ever changing technology.

A static system that is not able to grow with the needs of the state would be a waste of time and money.

We need a well thought out e-regulations program that can give us the short term easy access to regulations that Connecticut's citizens deserve but can down the road be expanded and grow with changing technology and user need.

I thank you for your time and would be glad to answer any questions.

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