



Maine Town & City Clerks' Association

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Date: March 13, 2025

To: Senator Joe Baldacci, Senate Chair
Representative Suzanne Salisbury, House Chair
And members of the State and Local Government Committee

From: Patti Dubois, Chairperson, Legislative Policy Committee
Maine Town and City Clerks' Association

Re: LD 965 – An Act to Require the Automatic Repealing of Agency Rules

Position: Neither For Nor Against

The Maine Town & City Clerks' Association is neither for nor against LD 965 and we thank you for the opportunity to outline our points for your committee.

Clerks recognize that rules should be regularly reviewed; however, the authority of agencies to propose, amend, and repeal rules has worked well and should be preserved. Moving these responsibilities to a partisan platform could create significant fluctuations in procedures that could result in inconsistent administration of important services offered to our residents.

Members urged caution when considering this proposal, since automatic repeal of certain rules would create chaos in critical clerk functions regarding vital records and elections, specifically. Election functions including determining voter intent, election recounts, election complaint procedures, administration of issuance and processing of uniformed and overseas voters' absentee ballots and voter list maintenance procedures are detailed in various rules. Vital records processing outlined in rules include amendments of vital records, disclosure of vital statistics data, marriage license administration, fees including municipal service fees paid to the state, and the overall administration of vital statistics in Maine.

Should amendments to the agency rules procedure be pursued, a specified periodic review by each agency, completed on a staggered basis initially, could be considered.

The Maine Town & City Clerks' Association appreciates the opportunity to share its testimony with the Committee. Should any questions arise, please feel free to contact me at (207)680-4210 or by email: pdubois@waterville-me.gov.