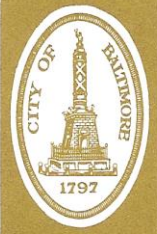


<b>FROM</b>	NAME & TITLE	Alan Robinson, Assistant City Administrator	CITY of BALTIMORE  <b>MEMO</b>	
	AGENCY NAME & ADDRESS	<b>Office of the Mayor</b> 100 N. Holliday Street, Room Baltimore, MD 21202		
	SUBJECT	City Council Resolution 23-0354 - Administrative Procedure Act - Revisions		

**TO** The Honorable President and Members of the Baltimore City Council c/o  
Natawna Austin, Executive Secretary

DATE: July 20, 2023

The Office of the Mayor has completed its review of City Council Bill 23-0354. This bill clarifies the role of the City Administrator, the Department of Law, and the Department of Legislative Reference in reviewing proposed regulations prior to public notice and comment; revises provisions regarding the initial submission process for a proposed regulation; and revises provisions regarding agency noncompliance with the Administrative Procedure Act.

The Office of the Mayor supports City Council Bill 23-0354 with the addition of amendments from DLR and the Department of Law (“Law”). These amendments aim to correct the inefficiencies resulting from the application of the current APA requirements in the promulgation of regulations, specifically addressing the following areas:

- The initial drafting period, as well as the required public notice and comment period
- The creation and management of a monthly register of City regulations (the “COBRA Register”)
- Clarification of the role of the City Administrator in the approval of proposed regulations

The City Administrator and the Office of the Mayor **supports the passage with amendments** of City Council Bill 23-0354- Administrative Procedure Act – Revisions.