

NASS ACR 2022

Colborn Presentation: Rules Analysis

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Background

- ▶ Iowa rulemaking process: Iowa Code chapter 17A
- ▶ Administrative Rules Review Committee (ARRC)
 - ▶ 10 legislators
 - ▶ Fairly strong legislative oversight of rulemaking
 - ▶ Reviews new noticed and adopted rules on a monthly basis, as well as misc. rulemaking matters
 - ▶ Can delay adopted rules, sponsor legislation, among other powers
 - ▶ Some members are particularly suspicious of agencies as a general matter
- ▶ Legislative Services Agency (LSA): publishes rules, staffs ARRC, other functions
 - ▶ Nonpartisan arm of the legislative branch
- ▶ I oversee publication of rules, am legal counsel to the ARRC, also draft bills

Issue: Untimely rulemaking

- ▶ ARRC began to see more rule filings implementing bills years after enactment
 - ▶ Rule filings implementing legislation generally identify the bill and year
- ▶ Sometimes just nonsubstantive updates, sometimes substantive
- ▶ Had been somewhat of a long-term issue, but began to really catch the ARRC's eye around 2015
- ▶ General complaints and criticism at ARRC meetings didn't seem to bring about improvement
- ▶ Finally, ARRC members wanted something to be done about this

Solution 1: Legislation

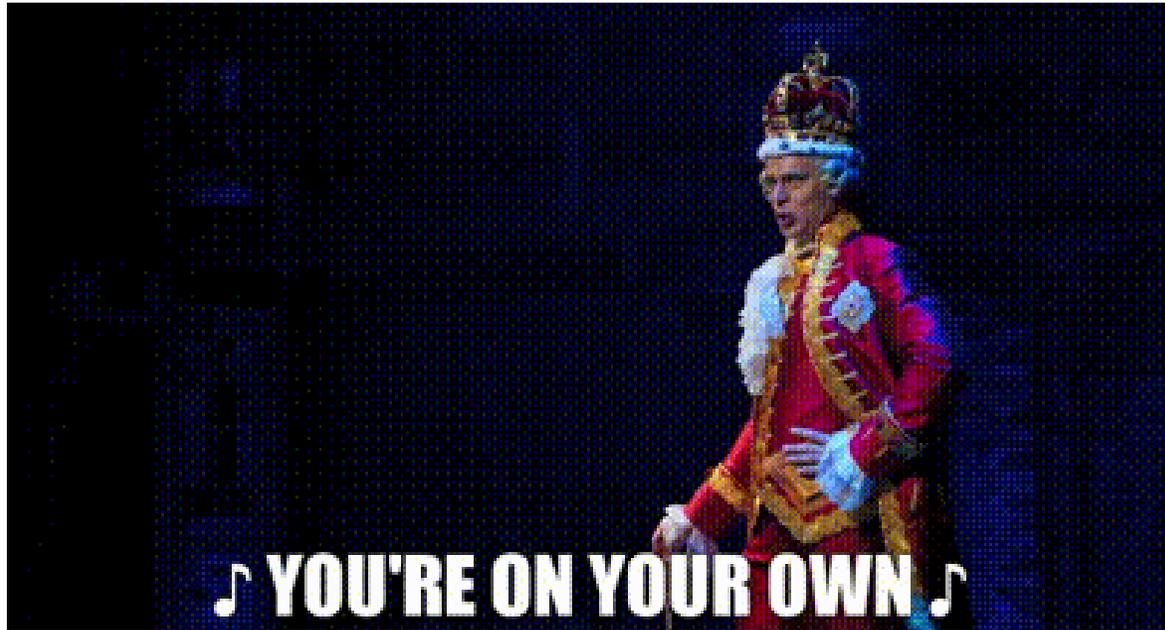
- ▶ Enacted a bill in 2016 providing that rulemaking required by newly enacted bills going forward be commenced within 6 months of each bill's effective date (generally July 1)
 - ▶ Filing of a notice of intended action is sufficient; rules need not be effective yet
- ▶ If not commenced within 6 months, an agency must provide a written notification to ARRC explaining the delay and providing a timeline
- ▶ Generally interpreted to include both substantive policymaking rules as well as nonsubstantive updates, but interpretations vary somewhat
 - ▶ Tricky to determine when rulemaking is required in some instances
- ▶ <https://www.legis.iowa.gov/legislation/BillBook?ga=86&ba=hf2449>
- ▶ A subsequent attempt to enact a financial penalty on agencies for late rulemaking was not enacted, but did serve to indicate to agencies that ARRC considers this a serious matter

Solution 2: LSA rules analysis

- ▶ In Nov. 2015, ARRC directed me to establish an annual process to track all required rulemaking from new bills in order to ensure it is getting done, starting with 2016 session
- ▶ No guidance given on how I should accomplish that, no additional resources
- ▶ A big task! (~150-180 bills per session, annual sessions)
- ▶ I did successfully reject a request to apply this retroactively

Establishing a process

- ▶ Turnaround time for a process for 2016 session was short
- ▶ ARRC directive came Nov. 2015, session usually runs mid Jan. to late April or early May
- ▶ 6-month expectation typically means most rulemaking must begin by Dec. 28 each year; a tracking mechanism ideally should be ready before then
- ▶ Projects with major development requirements for our Computer Services Division (CSD) typically take months to get to initial version
 - ▶ Major development largely goes on hold during session
- ▶ LSA didn't have much of a project management structure at that time
- ▶ So...

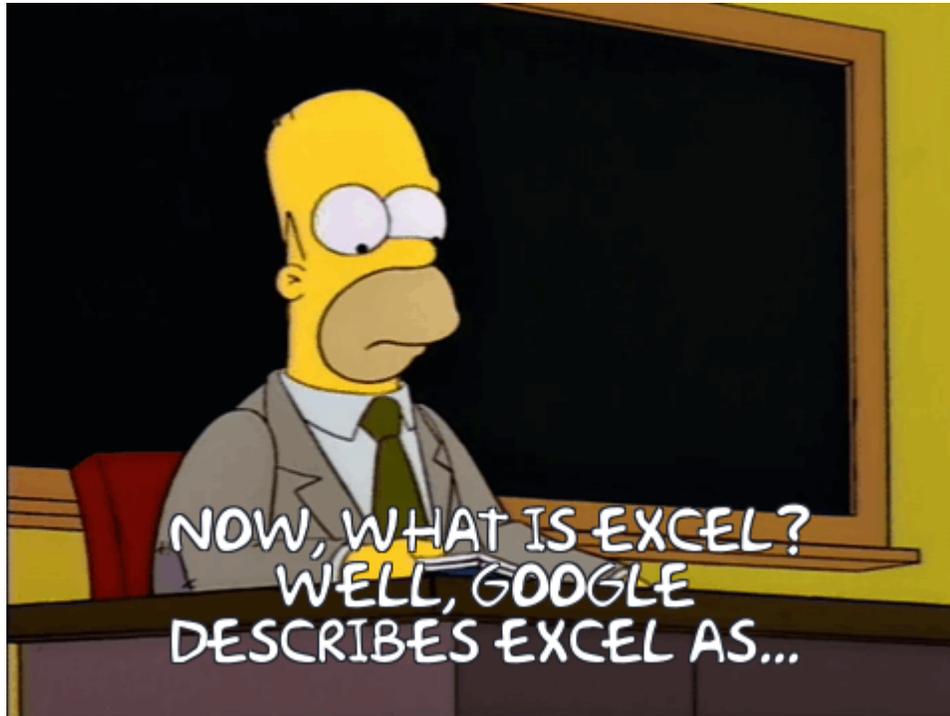


Process, cont.

- ▶ I'm also a bill drafter and committee staffer during session, so my time then is more limited
- ▶ Human resources: during the interim, bill drafters have more time for various projects
- ▶ Our division director signed off on me conscripting bill drafters to analyze their enacted bills after session to find possibly required rulemaking
- ▶ So I've got people, but what should this thing look like?
 - ▶ Needed to put something together on my own; my IT knowledge is so-so at best
- ▶ Probably going to need some charts. Maybe Excel?

NOPE!

Haven't really used Excel since 8th grade



Microsoft Word it is!

- ▶ Best tool for the job? Maybe not.
- ▶ Do I know how to use it? Sure!
- ▶ I designed a chart template in Word for drafters to use, got ARRC sign off
- ▶ CSD did put together a simple Macro for drafters to access the chart and auto save the charts to the same folder on an internal drive, so they are easy for us to locate

Chart

Rules Analyses Report for 2017 Iowa Acts

SF 2001

Act Section Relating to Rulemaking	Rules Analyses	Rulemaking Agency	Code Section Relating to Rulemaking in Act	Code Section Relating to Rulemaking Not in Act, if any	Current Agency Rules in IAC, if any	ARC# or other status
	Choose an item.					
	Choose an item.					
	Choose an item.					
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Column 1: Act section relating to rulemaking

- ▶ Charts go through bills section by section horizontally; bills sections with common theme can be combined to simplify the chart

Column 2: Rules analysis

- ▶ This is where the drafter determines whether a bill section may require rules
- ▶ 3 options:
 - ▶ Rules required
 - ▶ Rules authorized or implicated
 - ▶ No rules involved
- ▶ Entails reading a bill section in its broader statutory context; not limited to the 4 corners of the bill
- ▶ Drafters consult the bill, Iowa Code, Iowa Administrative Code, and other research tools to carry out this analysis
 - ▶ Sophisticated electronic search capabilities: website search and Folio
 - ▶ Also an autogenerated table of references in rules:
<https://www.legis.iowa.gov/law/administrativeRules/additionalInfo/rulesImplementingStatutes>

Rules required

- ▶ Bill section, read in its broader statutory context, explicitly requires rulemaking
- ▶ Or the bill section renders an existing rule out of date
 - ▶ Some might not consider this a rulemaking requirement, but this is a parameter the ARRC set
- ▶ So rulemaking requirements can be implicit, for purposes of this project

Rules authorized or implicated

- ▶ If a bill section authorizes, but doesn't require rulemaking (usually "may")
- ▶ Or if a drafter cannot determine whether a bill section requires rules
 - ▶ Sometimes relationships between statute and rule are complex
 - ▶ Drafters may lack sufficient expertise
 - ▶ Judgment calls and gray areas are inevitable
 - ▶ This category facilitates giving agencies the benefit of the doubt

No rules involved

- ▶ Bill section doesn't involve rules
- ▶ Common reasons:
 - ▶ Relates only entities not subject to APA: private entities, courts, governor, legislative branch, local governments, etc.
 - ▶ Relates to a subject on which no agency has ever had rules
 - ▶ Some minor nonsubstantive changes

Columns 3-6

- ▶ Rulemaking agency: who has to make the rules?
 - ▶ Can have multiple rows per bill section if multiple agencies involved
 - ▶ Iowa has about 100-150 agencies, depending on how you count
- ▶ Code section relating to rulemaking in Act: what Code provision is being enacted or amended?
- ▶ Code section relating to rulemaking not in Act, if any: Where the rulemaking authority is if not contained in the bill section itself
- ▶ Current Agency Rules in IAC, if any: What rules need to be amended
 - ▶ Can be left blank if only new rules need to be made

Column 7

- ▶ ARC # or other status
- ▶ This is where I indicate whether rulemaking or any other relevant activity has occurred
- ▶ An ARC number is the tracking number assigned to each rulemaking document once it is accepted for publication
- ▶ This column can also be used to note that a rulemaking document has been filed and is under review by the Governor's Office, that the ARRC has been notified of the delay, that the agency disagrees with the LSA's determination, or other miscellaneous responses

Example

HF 384

Act Section Relating to Rulemaking	Rules Analyses	Rulemaking Agency	Code Section Relating to Rulemaking in Act	Code Section Relating to Rulemaking Not in Act, if any	Current Agency Rules in IAC, if any	ARC# or other status
1	Rules authorized or implicated	Alcoholic Beverages Division	123.3.11	123.10	185.4.10(6)(b)	
2	No rules involved		123.30.3.c.(1)			
3,6,9,10	No rules involved		123.36.6, 123.49.2.b, 123.134.4, 123.150			
4	Rules required	Alcoholic Beverages Division	123.46A.1, 2	123.10	185.4.5(2)	6138C
5	Rules authorized or implicated	Alcoholic Beverages Division	123.46A.1A		185.4.10	
7	Rules required	Alcoholic Beverages Division	123.49.2.d.(2), (3)		185.4.5(2)	6138C
8	Rules required	Alcoholic Beverages Division	123.49.2.d.(4)	123.10	185.4.10(1), (3)	6138C

Completion of charts

- ▶ I prepared a memo for drafters describing the process of filing out the chart and the analytical framework
- ▶ Also an in-person training session, which was also recorded
- ▶ Drafters are free to ask me questions as needed, tricky scenarios are inevitable
- ▶ Drafters get about 2 months to finish their charts, extensions given as needed
 - ▶ In year 1, I tried not giving a deadline, with mixed results...
- ▶ I slotted this in between other key interim projects bill drafters do
- ▶ There was no technological mechanism for me to know when a drafter is done with a chart at this point, so they gave me a paper copy as well as saving in an internal drive

Review of charts

- ▶ I review the bill drafters' charts when they are done
- ▶ Review both for substance and consistency of style
 - ▶ Style issues: consistency of agency names, rule citations, etc.
 - ▶ Most of the fields in the chart were freeform at this point, so there's variation
 - ▶ I focused my expectations for drafters more on substance than style
- ▶ I mark up paper copies and save updated versions of the charts or start over as needed
- ▶ Drafters are pretty good at this, so I usually don't have to reinvent the wheel
 - ▶ But plenty of results are overbroad or underinclusive
 - ▶ I give feedback as needed
 - ▶ Expecting perfection here is not realistic, but getting their input on the front end is useful
- ▶ Often, the rulemaking process begins between drafters' work and completion of my review, so I need to update the last column a lot
- ▶ Secondary ARRC staffer did a supplemental review

Report to the ARRC

- ▶ I then compile the charts into a report to the ARRC
- ▶ Intro describes LSA's process, the non-binding nature of the findings, LSA's lack of substantive expertise compared to agency, and a summary of the results
- ▶ Key stats and findings:
 - ▶ How many bills from previous session required rules
 - ▶ How many of those bills still have outstanding rules
 - ▶ Which agencies are responsible
- ▶ Many charts
- ▶ Report is provided and orally summarized at monthly ARRC meetings, updated each month until all outstanding rulemaking is accounted for
- ▶ Format of the report is pretty standardized
- ▶ Report doesn't speak to discretionary rulemaking or ongoing rulemaking after initial implementation of a bill

Report, continued

- ▶ Section-by-section breakdown is only included for bills found to require some amount of rulemaking that have one or more instances of outstanding rulemaking
 - ▶ This declutters the report somewhat
 - ▶ Sections not involving rules are also omitted from this breakdown
 - ▶ Members wanting more detail can ask, but that is rare
- ▶ I repeatedly caution ARRC members, orally and in writing, that LSA's analysis is not binding on agencies, and LSA doesn't have the expertise that agencies do
 - ▶ Separation of powers is a concern
- ▶ Therefore, agencies are free to disagree with the LSA's determinations
 - ▶ Members have generally accepted this
- ▶ 7 appendices is... a lot
 - ▶ I don't print the whole thing out for ARRC each month, just brief summaries; whole report is emailed
 - ▶ Engagement with the content varies by member

Report example

LSA Rules Analysis Report to ARRC on 2020 Iowa Acts:
Outstanding Required Rulemaking

HF 2389

Act Section Relating to Rulemaking	Rules Analysis	Rulemaking Agency	Code Section Relating to Rulemaking in Act	Code Section Relating to Rulemaking Not in Act, if any	Current Agency Rules in IAC, if any	ARC# or other status
10	Rules required	Human Rights Department	17A.9A		421.7	
10	Rules required	Boiler and Pressure Vessel Board	17A.9A		875.81 875.84.1(5) 875.85.15(4)	
10	Rules required	Archaeologist	17A.9A		685.2.2(9)	
10	Rules required	Chief Information Officer, Office of the	17A.9A		120.2.14(16) 120.7.1	
10	Rules required	Real Estate Commission	17A.9A		193E.1.5 193E.3.2 193E.4.2	

HF 2627

Act Section Relating to Rulemaking	Rules Analysis	Rulemaking Agency	Code Section Relating to Rulemaking in Act	Code Section Relating to Rulemaking Not in Act, if any	Current Agency Rules in IAC, if any	ARC# or other status
23-29	Rules required	Real Estate Commission	272C.1.7A, 272C.4.13, 272C.10.5, 272C.12, 272C.13, 272C.14, 272C.15		193E.3 193E.4 193E.5 193E.10	

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(Note: This is the first of several slides with embedded content. Reach out to me if you want copies.)

Common trends over the years

- ▶ Each year around 35% of bills don't require or implement rulemaking, 30% authorize or possibly implicate rulemaking, 35% require rulemaking
 - ▶ Less variation than I'd have expected
- ▶ Around 40ish bills a year have outstanding rulemaking
- ▶ Around 20 agencies typically have one or more instances of outstanding required rulemaking
 - ▶ Bills sometimes affect multiple agencies
 - ▶ Some outliers when a bill affects all or many agencies; APA changes, prof. licensing changes, etc.
- ▶ A mix of agencies constantly subject to statutory changes and more stable agencies
- ▶ On the whole, agencies have been getting better at updating their rules over the years

Agency outreach

- ▶ After initial report is presented to ARRC, I contact each agency found to have outstanding required rulemaking by email; format is mostly standardized
- ▶ Would it make sense to check with agencies first before reporting to the ARRC?
 - ▶ Sure!
 - ▶ But agencies often need time to digest and respond the findings, and it already takes quite a while to get the report together; agencies get more time to respond in detail this way if ARRC already has something to mull over
- ▶ Email explains the process, notes nonbinding nature of LSA's findings, offers a variety of possible responses
 - ▶ After a few years of this, some agencies are used to these exchanges, some need education

Example email

Ewing, Jack [LEGIS]

From: Ewing, Jack [LEGIS]
Sent: Friday, March 19, 2021 3:31 PM
To: Van Pelt, Angela [IDA]
Subject: LSA rules analysis for ARRC
Attachments: 2020 LSA rules analysis report - Aging.docx

Angela,

I'm contacting you regarding the LSA's rules analysis for 2020 bills at the direction of the Administrative Rules Review Committee (ARRC). Attached are one or more charts with analysis of bills enacted in the 2020 session for which the LSA, under instructions from the ARRC, has determined rulemaking is required and for which all required rulemaking has not been initially filed or for which the ARRC has not received a response from your agency. The charts analyze bills section by section. Sections found not to involve rulemaking, or to only authorize or possibly implicate rulemaking, are omitted, and sections found to require rulemaking are noted as such in the attachment. Also included in the attachment is language describing the limitations and nonbinding nature of the LSA's analysis, of which the ARRC have been made aware. As soon as you are able, please provide a written response regarding these bill sections so that an updated report can be provided to the ARRC.

Bills for which the LSA has found that rulemaking is required may be subject to Iowa Code section 17A.4(9). That section requires that agencies commence rulemaking expressly required by a provision of a newly enacted bill, or a statute related to such a bill, within 180 days of that provision's effective date. The language of section 17A.4(9) is included in the attachment.

Possible responses regarding a bill section may include, but are not limited to:

- A written notification to the ARRC pursuant to Iowa Code section 17A.4(9) or an explanation that the 180-day period has not elapsed
- That the required rulemaking has already been assigned an ARC number that has been erroneously omitted from the chart
- That the required rulemaking has been filed and is undergoing preclearance by the Administrative Rules Coordinator
- That the agency disagrees with the LSA's analysis that rulemaking is required, including an explanation for the disagreement
- That the chart contains an error, including an explanation of the error
- That the agency does not believe that Iowa Code section 17A.4(9) is applicable, including a description of any planned related rulemaking

Thank you for your assistance. Please let me know if you have any questions.

Jack Ewing
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Example agency memo

LSA Rules Analysis Report to ARRC on 2020 Iowa Acts:
Outstanding Required Rulemaking

HF 2389

Act Section Relating to Rulemaking	Rules Analyses	Rulemaking Agency	Code Section Relating to Rulemaking in Act	Code Section Relating to Rulemaking Not in Act, if any	Current Agency Rules in IAC, if any	ARRC# or other status
10	Rules required	Aging Department on	17A.9A		17.1.(14) 17.11	

Dialogue with agencies

- ▶ The nature of agency responses varies quite a bit
- ▶ Some agencies know the routine here, some need education
 - ▶ When necessary, I try to help agencies determine responses appropriate to their situations
- ▶ Agencies will sometimes assert that rulemaking is not required, but acknowledge it is advisable and do it anyway
- ▶ Agencies sometimes convince me our determination is substantively incorrect, and I update the chart accordingly
- ▶ Sometimes we do make mistakes due to lack of expertise with the subject matter, but also simple human error
- ▶ I largely give agencies deference and the benefit of the doubt, don't try to sow conflict between the branches

Dialogue, continued

- ▶ ARRC typically doesn't push back on agency justifications for delays
 - ▶ Higher profile agencies that "phone in" their responses are sometimes criticized, smaller agencies given more slack
 - ▶ A follow up response or some brief dialogue at an ARRC meeting is usually enough to resolve the matter
- ▶ Unequivocal disagreements are very rare
- ▶ Agency disagreements of any kind seem to be largely made in good faith
 - ▶ Because ARRC and I don't question responses much, this could incentivize bad faith responses
 - ▶ But most agencies seem to take this seriously
- ▶ Agency responses vary in length and substance depending on the circumstance
 - ▶ Inexperienced agencies occasionally give brief unserious responses; I try to smooth it over

Dialogue, continued

- ▶ Agencies may take days or weeks to respond
- ▶ Sometimes I have to hunt for the right agency contact; agency turnover is an issue
- ▶ Responses are typically forwarded to the ARRC and also condensed and incorporated into an updated report to the ARRC

Typical agency reasons for delay of rulemaking

- ▶ Agency turnover
- ▶ Need for approval from federal agency (e.g., Medicaid changes)
- ▶ Additional relevant legislation expected the following session
- ▶ Lack of funding
- ▶ Litigation (voting rights, abortion, etc.)
- ▶ Controversy/complexity of subject matter, need for protracted negotiation with interested parties
- ▶ Agency just missed a relevant bill
 - ▶ Bandwidth during session varies by agency
 - ▶ DHS trailer example
- ▶ Some concern in ARRC about nonfeasance or malfeasance: not an issue in my experience

Transitioning the project

- ▶ The logistics of the project felt unsatisfactory from the start
- ▶ My lack of time and technological savvy
- ▶ LSA's project management process was not robust at that point, so somewhat challenging to get help efficiently
- ▶ So much paper!
- ▶ Sorting, updating, checking, rechecking, moving the paper: it all took forever
 - ▶ Sometimes papers get lost
 - ▶ Sometimes typos cause trouble
- ▶ I and other ARRC staffer would mark our edits on paper copies then create new Word versions; track changes felt cumbersome
- ▶ Guess what happens next?



(This is only a small sample)

OH NO!



Shredder!

- ▶ Once it was unlocked, we ultimately determined they were only outdated copies
- ▶ LSA's document disposal contractor was so unhelpful, we ended up getting a new one
- ▶ This incident helped get the ball rolling on upgrading the process
- ▶ LSA had recently established a Process Improvement Office (project management unit); I'd worked with their staff before on other matters
 - ▶ Perfect for this kind of work
- ▶ Establishing a new, more efficient, higher tech process was made a priority
 - ▶ I had solid support from management to get something done; we made the time for development
- ▶ I was largely given discretion to work with our PM and CSD teams to come up with a new process

Project development

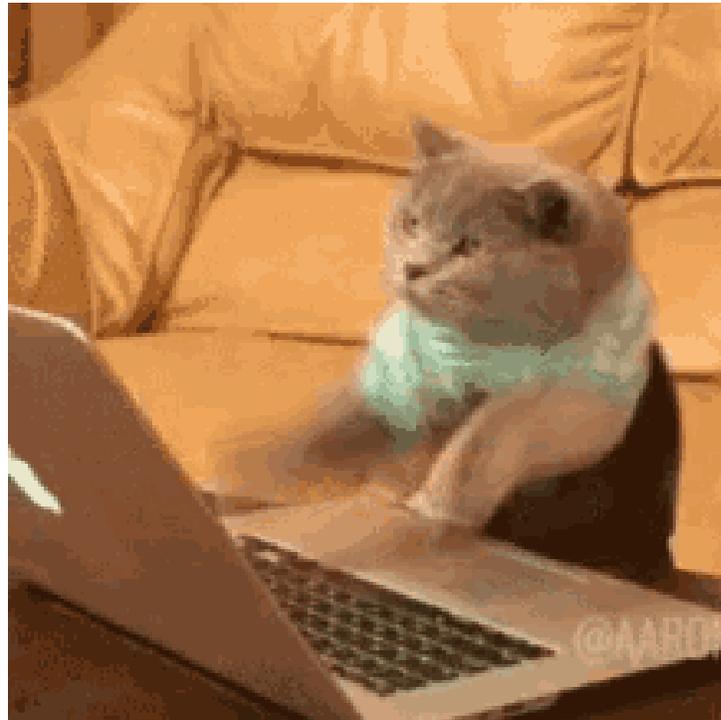
- ▶ Basic workflow would be retained: bill drafters to me to ARRC to agencies
 - ▶ Dropped secondary ARRC staffer review; nonessential step
- ▶ Kept the chart structure for each bill and the overall analytical framework
- ▶ Just needed better tools/logistics
- ▶ Key objectives:
 - ▶ Significantly less paper
 - ▶ Uniformity of charts
 - ▶ Have all the charts sync up with one another, so everything wouldn't need to be manually updated and checked
 - ▶ Simplicity! (sometimes lacking in other LSA endeavors)

Development, continued

- ▶ Development took about 6 months, a lot of iterative discussion
 - ▶ COVID struck in the middle, main PM left the LSA, later the main developer did too; slowed things down a bit
- ▶ LSA had an existing program we use for various endeavors relating to bills and the Iowa Code, but it is quite complicated and somewhat old
- ▶ Decision was made to create a new tool for this process
 - ▶ Again, avoiding too much complexity was a key goal of mine
 - ▶ I lacked the technical knowledge to get into the weeds on coding and whatnot, had to defer to CSD and see what they come up with each time

Project design

- ▶ Bear in mind I don't really know what I'm talking about here
- ▶ In you're interested, I can put you in touch with our CSD staff



Design, continued

- ▶ Tool is housed in LSA's existing online "portal" system, but the tool itself is new
- ▶ The tool was designed using a "Bootstrap" framework
- ▶ Framework is supported by JQuery and SQL
- ▶ After discussing with our CSD staff and googling it, I still can't explain that very well
- ▶ Overall design approach was new for LSA in terms of IT

Design features and demo

- ▶ New tool is easy to use, efficient, has a clean visual look
- ▶ New tracking tools for me so I can see how things are progressing
- ▶ Reports and charts are autogenerated based on what drafters and I input
- ▶ Bills automatically assigned to drafters shortly after enactment
- ▶ Electronic routing of charts
- ▶ Dropdowns for agencies, statutes, rules: no more free form
- ▶ Paperless!
- ▶ Past years (that were completed using the tool) are archived
- ▶ Let's take a look and see examples: <https://www.legis.iowa.gov/portal>
 - ▶ Using the tool requires an LSA log-in

Outcomes from new tool

- ▶ No more paper
- ▶ Uniformity in charts
- ▶ Time savings: no more manually updating every field in every document, no more moving paper around, less checking for errors
- ▶ Drafters find it easy to use, even more tech-skeptical ones
- ▶ After initial training, I've gotten relatively few questions about the functionality
 - ▶ Training has video, paper, and in-person options
- ▶ It's been fairly easy to get minor technical changes to the tool implemented; no major changes needed since launch

Challenges with new tool

- ▶ PM and main developer left the LSA during the development phase
- ▶ COVID hit during development
- ▶ I went on paternity leave during first full year of use
- ▶ The tool can run slow for bills with 100+ sections (maybe 5-10 a year)
- ▶ Tool can be cumbersome for bill sections affecting many agencies
 - ▶ There is an “all agencies” option, but different subsets have to be dealt with individually
 - ▶ This is somewhat of an issue with the rules analysis process generally though

Positive outcomes of the overall project

- ▶ New tool is awesome! Drafters and I are very satisfied
 - ▶ Shows value of good project management and IT staff
- ▶ A more accurate, up-to-date Iowa Administrative Code
 - ▶ Helpful to the public, agencies, our rule editing staff, me...
- ▶ Agencies getting more attuned to the entirety of their rules, to more fully monitoring legislation, and to determining relationships between statute and rule
 - ▶ Particularly helpful for smaller agencies that don't have the bandwidth to monitor everything on their own
- ▶ Fewer outstanding rules getting flagged in report as years go by
- ▶ ARRC has been seeing rules being made on more timely basis, more thorough rulemaking

Positive outcomes, continued

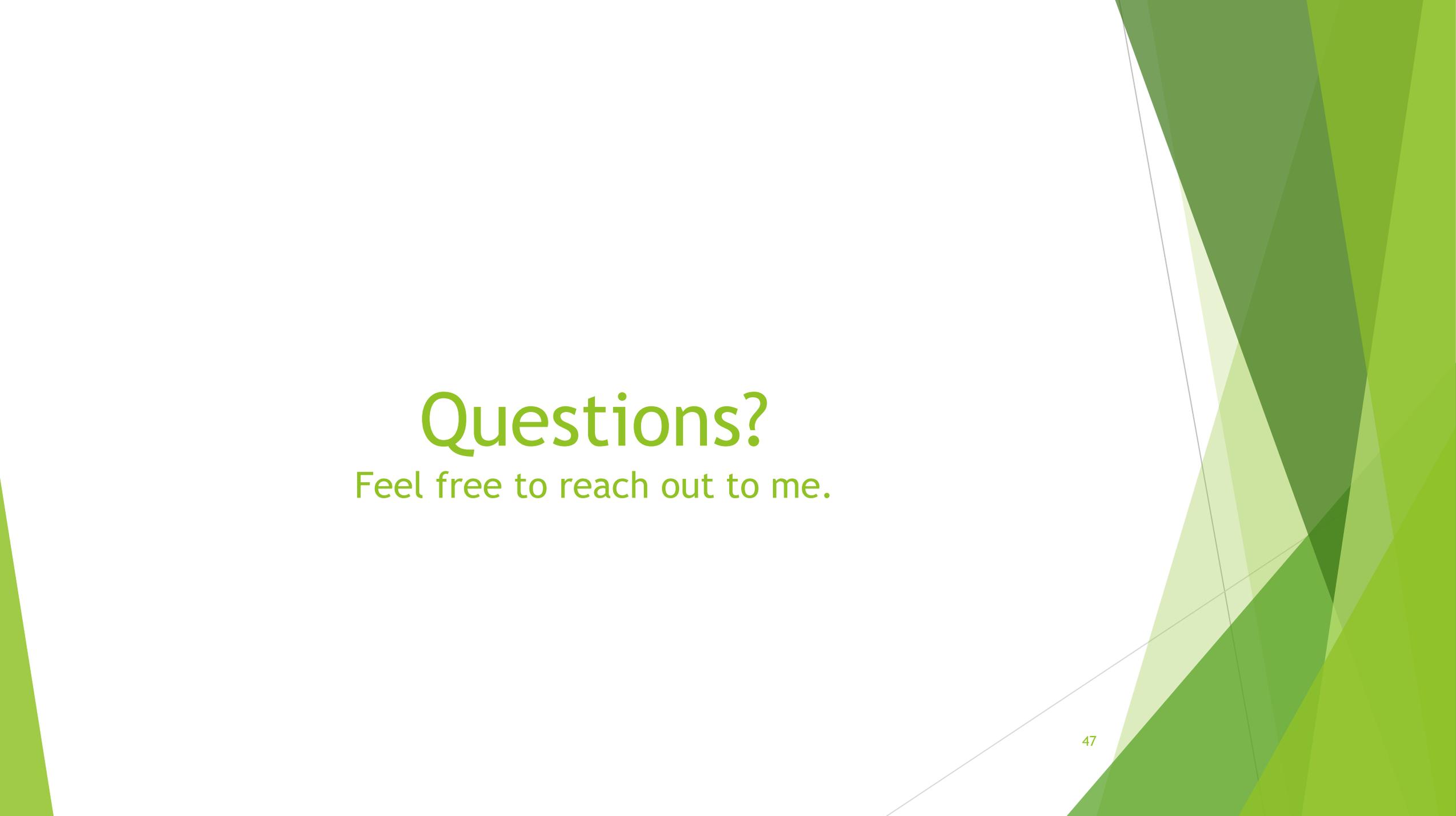
- ▶ ARRC has gotten a better understanding of issues agencies face when implementing rules
- ▶ Rulemaking issues proactively addressed somewhat more often in bills
 - ▶ Apprentice bill example
- ▶ Governor's office started flagging bills with possible rules issues upon Governor's signature
 - ▶ Governor's office has generally backed the ARRC's emphasis on timely rulemaking
- ▶ Bill drafters getting to know relevant rules better
- ▶ No other process in Iowa to systemically address these issues
- ▶ I've been plugging the tool as an option for other LSA endeavors; we'll see if the framework gets used for other purposes

Ongoing challenges with the project

- ▶ Large, complex bills still take a lot of time to get through
- ▶ Agency turnover/agencies inexperienced with rules
- ▶ Difficult agencies
 - ▶ Not really their fault!
 - ▶ Dept. of Revenue: lately, every year is a tax reform year
 - ▶ Licensing entities: dozens of these, Iowa Code doesn't treat them consistently
 - ▶ Dept. of Human Services: size, reorganization
- ▶ Even with the new tool, this project still takes up a lot of my time; finishing before Dec. 28 is difficult
 - ▶ I'm somewhat of a choke point in the process
- ▶ Interplay between the branches can be tricky at times; LSA and ARRC can't really order agencies around
- ▶ No matter how efficient the project gets, it will always be hard for agencies and LSA to catch every possible rulemaking implication from every section of every bill

What's next?

- ▶ An “undo” button in the tool
- ▶ Possibly interweave this project with other processes for rules
 - ▶ 5-year review of rules, rule annotation, editorial revision process
- ▶ As agencies have gotten better at getting their rules done, ARRC concerns have cooled down
 - ▶ Could/should the project be scaled down?
 - ▶ Perhaps decouple tracking of substantive vs nonsubstantive rulemaking
- ▶ I've thus far decided automating communications with agencies through the new tool doesn't add enough value, but may consider in the future

The background features abstract, overlapping geometric shapes in various shades of green, ranging from light lime to dark forest green. The shapes are primarily triangles and polygons, creating a dynamic, layered effect. The overall composition is clean and modern.

Questions?

Feel free to reach out to me.