Bhutan workshop on legislative and regulatory drafting (23 August - 3 September, 1999)

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A PROPOSAL FOR A MISSION TO BHUTAN

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Based on the TOR and on our experience with similar projects elsewhere, we offer the following draft proposal. We cannot emphasize strongly enough that this proposal centers on creating a process of working together with Bhutanese experts to develop a Bhutanese Legal Framework designed to fit Bhutanese circumstances and to respond to the needs of the Bhutanese people. Our own and international experience and legislative theory alike teach strongly that no country can confidently copy another country's law. To improve its legal order, Bhutan cannot confidently copy a program from Sri Lanka or China or anyplace else. Only a process in which Bhutan experts study the problem and its causes in the context of Bhutan's unique circumstances will produce effective detailed measures for strengthening Bhutan's Legal Framework. As its central strategy, this proposal aims to initiate that process. So doing, it will begin to draft laws for the Bhutan Legal Framework, and to build Bhutanese capacity to carry on that process independently.

This proposal deals with six main points:

(1) A brief elaboration of the strategy underlying this proposal, that is, what we understand as the problem, and the pedagogical methods that underpin the proposed process for dealing with it;

(2) suggestions for the two week workshop (January 18-30, 1999) for engaging Bhutan personnel in instituting processes of evaluation and assessing the needs of the existing
Bhutanese legal order;

(3) proposals for the second two week workshop (March, 1999), concerning legislative drafting, including using that as the basis for the succeeding two workshops by beginning drafting laws not only on the bill-creating process itself, but also selected commercial bills and a bill concerning juvenile delinquency;

(4) suggested procedures for setting up the workshop on commercial law (May-June, 1999);

(5) suggested procedures for setting up the workshop on juvenile justice; and finally

(6) suggested procedures for preparing a Drafting Manual for Bhutan.

The final Part will outline an estimated budget.

I. THE STRATEGY UNDERLYING THIS PROPOSAL

This section first describes the general strategy on which this proposal rests. It explains why, rather than importing foreign consultants to draft laws for Bhutan, this proposal aims to engage Bhutan officials in drafting them. In a learning by doing process, using a problem-solving methodology, these officials will conceptualize, design and begin to draft new priority laws. In so doing, they will strengthen their capacity to produce the legislation Bhutan needs. Finally, this section discusses who ought to participate in the workshops.

A. NOT A TREASURE-BOX, BUT A TOOL KIT
No foreign expert can bring to Bhutan or any other country a treasure chest full of laws to meet that country's needs. Instead, properly understood, the proposed workshops constitute opportunities to enable Bhutanese officials to accomplish two objectives: To produce preliminary draft selected priority bills and research reports justifying them, and to acquire the tools -- the legislative theory and techniques -- required to enable them draft other laws to meet their own realities and needs.

Even when laws in different countries have identical wording, the behavior in the face of those laws varies from country to country. That occurs because people behave in the face of a law in response not only to the law's words, but also to a host of non-legal factors thrown up by the actors' individual environments: The individuals' opportunities, capacities and decision-making processes, and their personal values, attitudes and interests. All these reflect their country's historically shaped constraints and resources. That implies that, except accidentally, a law that induces one sort of behavior in one time or place will not likely induce the same behavior in a different time and place. It could induce the same behavior only if the relevant non-legal circumstances in both placers very closely resembled each other. That practically never happens. Every country is unique; Bhutan, too, is unique. Bhutan cannot strengthen its legal framework by someplace finding a model law to copy. Like every country, to solve its own problems, Bhutan has no exit but to devise its own laws, and to base those laws solidly on the specific, unique Bhutanese circumstance.

That does not say that Bhutan cannot learn from foreign law and experience. A person or
country can learn from human experience, wherever located. To learn, however, does not mean to copy. From foreign law and experience Bhutan can copy little, but can learn much.

Whatever a consultant’s background or experience, without doing on-the-ground research into the Bhutanese circumstances, nobody can draft a law likely successfully to address a Bhutanese problem. Bhutan officials and researchers know their own country. Better than any foreign consultants, they can capture the facts necessary to ground laws to resolve Bhutanese problems. At the end of the day, for Bhutan, the legal drafters of choice consist of Bhutan’s own officials and drafters.

By helping to find consultants who promise, not a treasure box, but a tool kit, the project aims to equip Bhutan participants to use the kinds of tools they need to draft not only the three sets of laws specified in the TOR, but, over time, all the new laws that Bhutan will likely need. The project will, of course, see to the drafting of rules and regulations concerning drafting itself, commercial law and juvenile justice, the three priority areas identified by the TOR. It will, however, do so by assisting Bhutanese drafters and officials to do the actual drafting, using the occasion to build their capacity in these areas. In short, the process here proposed has a two-fold objective: To draft the laws identified by Bhutanese as necessary, and to build Bhutanese capacity to draft these and the additional legislation needed to strengthen the Bhutanese Legal Framework. That process calls for a problem-solving methodology.

B. A PROBLEM-SOLVING METHODOLOGY.
Proposals to draft new laws inevitably seek to solve perceived social problems. For example, inappropriate market structures, or increasing juvenile delinquency. Nobody fixes a wheel not broken; nobody writes a law except to try to overcome a social problem. How to conceive and draw legislation likely to resolve a social problem? That requires a methodology that will likely guide the drafter to analyze the available evidence relating to the problem as it appears in Bhutan’s specific circumstances.

The proposed workshops would engage Bhutanese participants in using a problem-solving methodology that provides exactly that sort of guide. That methodology requires the use of facts at each of four steps: identifying the social problem; explaining the causes of the behaviors that comprise it; formulating legislative measures that, logically, seem likely to alter or eliminate those causes; and, once enacted, evaluating the law’s social consequences. These four steps serve to structure an outline of the kind of report of available evidence (a research report) that should accompany and explain an important bill. Only so can the drafter rest assured that the research covers all that it should; only so can legislators make an informed decision whether to enact the bill into law.

As a first step, problem solving requires identifying the nature and scope of the social problem. The problem a drafter faces with respect to juvenile justice does not begin with perceived weaknesses in the present legal regime for juvenile justice. Instead, it should begin with an understanding of the way society now treats delinquent youth, and the weaknesses in that process. Similarly, drafters cannot begin with a command to draft a commercial law. They
should begin with a particular social problem, and then discover the details of a law adequate to resolve it. For example, suppose somebody suggests -- as happened in Lao, Thailand and Vietnam -- that as part of its commercial law Bhutan needs legislation to govern checks as a legal form of payment. What – and whose – social problem would that check law address? If the social problem consists of foreign investors’ need for a way to make payments with which they have some familiarity, a check law may indeed constitute an adequate solution. If the social problem at which the check law aims, however, consists of deep seated inadequacies in Bhutan’s domestic payment system, experience in Lao, Thailand and Vietnam suggests that a check law of itself will not likely lead to a more convenient payments system. If in this respect Bhutan even slightly resembles those countries, it does not have in place the infrastructure on which a checking system rests: Convenient banks in all parts of the country; habits of putting savings into banks; trust in the relative honesty of most people who sign checks; a banking system capable of clearing checks promptly. Other payments systems exist. To solve a payments system problem, before deciding on adopting a checking system, surely Bhutan should get ideas from the many possible alternative payment systems and laws – and then devise one for Bhutan that fits its own special case. Good drafting begins, not with a law to draft, but the clear identification of the social problem that a law might solve.

The next step in the drafting process involves hypothesizing the causes of the behaviors that comprise the social problem, showing those hypotheses consistent with the available evidence. As the third step, the drafters can logically devise solutions likely, in light of the available facts, overcome the causes identified, thus inducing more desirable behaviors. As a
final step, drafters should build in monitoring and evaluation devices; if the resulting evidence shows that the law as enacted does not produce the desired results, the law-makers can propose revisions.

This methodology argues that rather than assigning a drafter to draft a law with a stated title, Bhutan would better identify the social problem for which policy-makers seek a legislative solution. The workshops here proposed will engage drafters to find an appropriate solution for defined problems. In finding a legislative solution for a specific problem, the drafter builds capacity to use legislation as a tool for solving other problems.

C. LEARNING TO DRAFT BY DOING DRAFTING

In the proposed workshops, the Bhutan participants will learn how to use two general categories of tools: How to go about developing legislative measures likely, if enacted, to use the available resources help resolve the perceived social problems; and how to write out those laws in clear, idiomatic, simple language that the people charged with obeying and implementing the laws can understand. How can the participants best learn these skills?

People may learn a skill through some instruction in the underlying theory and method, but mainly they learn best through actually using the skill. A brief lecture on how a bicycle works might help to learn to ride it, but actually getting on the bicycle and peddling off proves
indispensable. By the same token, to learn drafting, one must do drafting.

This proposal therefore rests on the requirement that *participants come to a workshop with bills for which they have the responsibility to draft*. As the TOR suggests, those bills should focus on three specified sets of perceived problems: Legislative drafting, business and commercial dealings, the treatment of juvenile delinquency. The participants will learn how to use legislative theory, methodology and techniques -- the tools required for drafting -- not by listening to lectures about how to use them, but by doing drafting.

Experience elsewhere underscores the benefits of institutionalizing this learning process by creating a national core of trainers who can continue to work with drafters and ministry personnel to produce the additional legislation Bhutan will need to further strengthen its Legal Framework. Therefore, in addition to the workshops proposed in the TOR, we recommend that Bhutan authorities and UNDP consider sending a core of a few Bhutanese officials, if possible including two from an appropriate teaching institution, to go abroad for a four months in-depth course in legislative theory, methodology and techniques. (The participants would, of course, need at least a minimal competence in English). On their return, they would assume responsibility for conducting future workshops and setting up learning-by-doing courses in existing teaching institutions to train more drafters and ministry personnel while producing needed Bhutanese legislation.

**D. THE PARTICIPANTS**
Obviously, the participants in the learning process should include those who presently do drafting, usually legally-trained personnel. Less obviously it should also include line ministry personnel charged with developing laws to carry out policies to resolve problems identified by the relevant ministries.

Too often, in many countries, a Minister charges an official to develop a law to implement a given policy. Without legal training, the line official feels powerless to deal with what the official perceives as a 'legal' issues. The official therefore drops the policy on the desk of a drafter in the central drafting office, and tells the drafter to produce a law. The drafter does, but does so in ignorance of the non-legal factors that might affect the addressee's behaviors. (Most frequently the drafter takes the easy way out: the drafter copies law from someplace else, with frequently ludicrous consequences). Yet frequently the line official has broad and deep knowledge of the non-legal circumstances involved. Experience elsewhere has shown that, when the line official and the drafter collaborate, almost invariably they produce a more effective, implementable law. In drafting laws in these workshops, we would hope that line officials dealing with specific social problems will attend together with drafters charged with drawing up the specific language of bills to address those problems.

SUMMARY

A law works by laying down rules aims to change problematic behaviors. Those
behaviors, however, depend not only on the law, but on the non-legal constraints and resources within which the law functions. Unless drafters craft their bills to take those non-legal constraints and resources into account, the resulting laws will not likely resolve the underlying social problems. That basic perception has a series of implications for a process that aims to strengthen Bhutanese Legal Framework. First, copying law cannot work; without extensive — and expensive — research on the ground; no foreign consultant sitting in London or Paris or New York can draft a law for Bhutan. The process here proposed aims instead to train Bhutanese to do the drafting. Second, the drafting process begins, not with a desired objective, but with a social problem. As here proposed, in the course of studying specified social problem, the drafters will evolve laws appropriate to solve them. Third, participants will learn drafting not through lectures, but through doing drafting. Finally, the workshop participants should include not only legally-trained drafters, but also officials from the relevant line ministries. The remainder of this paper addresses each of the proposed four workshops in turn, the problem of recruiting consultants, and the proposed budget.

II. THE FOUR WORKSHOPS

The TOR lays out four workshops. The first will address the general problem of strengthening the legal order with a view to assessing needs and developing the strategies that, in Bhutan's unique circumstances, will structure the project's learning-by-doing process of producing specific laws. The second will address the problems of legislative drafting; the third,
the commercial sector and the appropriate law for it; and the last, juvenile justice. This proposal discusses each of these in turn.

A. THE PRELIMINARY WORKSHOP: CONTINUITY AND CHANGE IN BHUTAN’S LEGAL ORDER (January 18-30, 1999)

This workshop will focus on engaging Bhutanese in identifying the needs and designing the strategies that will underpin the process of strengthening Bhutan’s Legal Framework.

Participants. These 30 Bhutanese who participate should include many of the stakeholders in Bhutan’s legal order – primarily, of course, the professionals who work in the system (judges, lawyers, ministerial officials, drafters, legislators), but also some people who can supply inputs about how the system appears to its users, and, if any exist, academics who have done research on the legal order in Bhutan. If possible, we would find it helpful to participate in the full two weeks of the workshop for several reasons: First, by taking part in the discourse between the participants, we would learn from them a great deal about the existing system and what they see as problems; second, based our experiences in similar workshops in other countries, we might raise questions and help them to design the next phases of the project; third, if deemed appropriate, we could serve as facilitators, especially concerning the design of the subsequent workshops.

Preparation. If possible, it would help if, before the workshop, the participants could
prepare remarks concerning the sectors of the legal order that they consider problematic. In this regard, participants should be encouraged to take a broad view of the legal order. Too frequently, both lay persons and judges and lawyers focus on courts and dispute settlement as the very essence of the legal order. That does, of course, constitute an important ‘law-job’; but others exist -- especially relating to the use of legislation, a growing proportion of which aims to solve problems without ever getting into courts. Perhaps a steering group in Bhutan could decide in advance what priority areas deserve discussion (the next section mentions some areas that, elsewhere, have frequently appeared problematic).

**Conduct of the workshop.** The workshop could provide organized discussions concerning the aspects of the Bhutanese legal order that appear troubling. Elsewhere these have included such matters as: (1) Dispute settlement systems (primarily, the structure and process of courts with respect to matters such as family disputes, contract enforcement and property transfers, labor disputes, environmental protection, criminal trials, appeals, juvenile justice, etc.); (2) the bill-creating system (legislative drafting), including the identification and prioritization of social problems requiring legislation, and the criteria and procedures for drafting laws to translate ministerial policies into effectively implementable legislation; (3) formulation and enforcement of administrative decisions, and protection against arbitrary administrative decision-making; (4) making and implementing subordinate legislation and rules; (5) enforcement of judgments; (6) popular participation in the administration of the laws; (7) the function of customary laws, if any, in Bhutan; (8) the adequacy of the substantive law in selected areas (e.g., market relations; environment; rights of women; agricultural extension services; land ownership; bus transport;
roads; health services; education; mining rights; the civil service).

Outcomes. We would hope that out of the first week of this workshop would come a needs assessment of Bhutan's legal order, expressed in terms not of required laws, but of social problems existing within the legal order. That could serve as a list of possible social problems that, together with others, political leaders could prioritize for future resolution. As a minimum, the workshop ought to produce a statement about the areas of social problem for draft legislation at the following workshops. The participants at the first workshop could also review the projected syllabi for the other three workshops, and make comments and recommendations. Finally, the workshop participants could contribute to identifying, if possible from among themselves, two persons who would assume responsibility for reviewing the draft Legislative Drafting Manual for useful revisions and possible translation into Dzongkha.

B. LEGISLATIVE DRAFTING WORKSHOP

(March, 1999)

Participants. This should include legislative drafters, and, in addition, fairly senior civil servants from line ministries concerned with the bills under discussion. For example, if a drafting team works on one of the commercial law bills (for example, concerning transfers of real property), then officials from the relevant line ministries (in our example, perhaps the Ministry of Agriculture and the Ministry of Urban Affairs, or their equivalents) probably should attend the workshop. Numbers of participants: We can work with almost any number up to 60 that, given
available funds, the Bhutan Government deems desirable, so long as they have sufficient bills to divide into small groups of five to seven persons for each bill. (In China we led a three-week workshop with some sixty people and a dozen bills). If possible, the two persons responsible for preparing the proposed Dzongkha Manual and the core of future trainers should participate.

**Preparation.** Before the workshop, someone with the necessary authority should decide on which bills the participants will work. These bills should surely include regulations concerning legislative drafting, one or more commercial bills, and at least one bill related to juvenile justice. By preparing draft research reports that identify the problems, their likely causes and possible solutions in Bhutanese circumstances, the participants will gain a good idea of what questions at subsequent workshops they should ask consultants in order to learn from relevant foreign law and experience.

**Content.** The second workshop will have three aspects. First, by engaging in the drafting process, the participants will learn the general legislative theory and methodology they need to use law more successfully to address social problems. We will provide a few lectures, but mainly, working with us and guided by the drafting manual we have prepared (see attached) they will learn-drafting-by-doing-drafting. In particular, they will write research reports that, structuring the available evidence by the problem-solving methodology, justify their bills. By following a prescribed outline in writing that justification, they will learn to use the methodology and legislative theory to guide their analysis of the facts relating to their social problems, and to design the appropriate details of their law to resolve them.
Second, one group of participants could focus on drafting regulations for the drafting process itself. That will afford an opportunity to discuss with all the participants the appropriate institutional structure of drafting in Bhutan. We append an outline of an analogous workshop held last June in Sri Lanka as an example of the syllabus that the Bhutan workshop might use.

Finally, to the extent that time permits, we will teach some of the legislative drafting techniques that seem useful for non-English speaking drafters – for example, outlining bills (i.e., ‘grouping and ordering’); the ‘who does what’ rule; amending bills; interpretation and definitional sections; drafting within constitutional and other limits; structuring discretion; drafting to make non-arbitrary decisions more likely; drafting defensively against corruption.

We note that the TOR includes pleading and conveyancing techniques. These both serve a very different function than the process of drafting legislation and regulations. Pleading raises a host of issues concerning judicial procedure: the form of hearing – mainly, whether adversarial (common law) or inquisitorial (civil law), and the effect of precedent. Conveyancing raises issues as long as wide as the entire law of real property. They could easily be included in the workshop by retaining consultants to take a few days of the workshop to lecture of these issues, but the participants would have little opportunity to use the information. Furthermore, that would considerably water down the material on legislative drafting. Perhaps, if it seems desirable, the participants in the first workshop could propose two separate sessions, perhaps conducted by Bhutanese experts, to deal exclusively with pleading and conveyancing in Bhutan. If the March workshop does not include pleading as a subject, the inclusion of two judges (one
from a common law, one from a civil law system) may prove unnecessary. Neither would seem
germane to the workshop insofar as it concerns legislative drafting.

Outcomes. We would expect very rough drafts (portions probably still in outline form) of
research report and bill for each of the social problem areas on which a drafting group worked
during the workshop. The participants would also have learned a considerable amount about
legislative theory and methodology -- at least enough not to feel intimidated when confronted by
the necessity of translating policies into effectively implemented legislation. They would have
only worked on drafting techniques enough to assess bills that might come before them, although
not enough to draft a bill independently. Their work on an institutional structure for the drafting
process should advance sufficiently to make well-considered recommendations about them.

Texts: Seidman and Seidman, State and Law in the Development Process
(London: Macmillan, 1994); Seidman, Seidman and Parsons, Legislative Drafting Techniques
for Democratic Social Change (Xerox draft, 1998; Kluwer to publish revised edition upon
completion).

C. COMMERCIAL LAW

As described in the TOR, two difficulties seem to confront Bhutanese relating to
commercial law: (a) the capacity of officials and judges to deal with commercial law cases; and
(b) inadequate commercial law regulations and laws. The first calls for a short course in
commercial law; the latter, a workshop in drafting commercial law. The description of the workshop content in the TOR suggests that the authors may have envisioned the former. If so, as discussed below, we would gladly assist in finding the necessary TAs to teach the course; no doubt the teachers would design their own curriculum and readings.

Alternatively, the workshop might address the problem of commercial legislation, following on consideration of some of the required bills at the legislative drafting workshop, that is, to option (b) above.

Participants. Drafters assigned to specific commercial bills, and representatives from the relevant Ministries; members of the private bar who might be available might be invited for at least part of the time.

Preparation. ‘Commercial legislation’ covers an enormously broad category. Either at the January workshop, or else someone in authority must decide which commercial law bills the workshop should consider. That ought to depend upon what constitute perceived problems in operating market-driven sectors of the economy. For example, if the perceived problem concerns enticing foreign investors, perhaps a foreign investment bill dealing with protections and inducements for foreign investors ought to have priority. If it concerns confused real estate titles and de facto immobility of the real estate market (usually primarily an urban phenomenon), then a real property law might appear indicated. If it concerns issues of public contracts, then the workshop might want to focus in part on public procurement law. In Sri Lanka, insurance law
appeared of central concern; in China, issues of privatizing publicly owned property. It depends upon Bhutan's situation; but, if possible, those decisions should be made well before the workshop, if only because the sort of consultants retained depends upon the area of expertise required.

Participants. Drafting teams, including legally-trained officials, and officials from the relevant ministries, would participate. The drafting teams who had worked on draft commercial laws in the March workshop might attend to help the new participants to use the problem-solving approach in structuring their bills and research reports.

Content. In effect, foreign consultants would conduct short (one-week) seminars in the foreign law and experience, counseling with the Bhutan drafters and officials on the content of their research reports and bills. In particular, the foreign consultants would help the drafting learn from relevant foreign law and experience about possible additional relevant problems, causes, and solutions that they had not previously considered. If it seemed helpful, we would be glad to participate in the May workshop and, at the same time, work with a team of Bhutanese officials in incorporating Bhutanese materials and translating the draft Manual for Bhutanese use into the Dzongkha language.

Outcomes. The participants would provide rough draft bills and research reports, including extensive relevant materials relating to foreign law and experience, for discussion as the basis for preparing more complete drafts in light of Bhutanese experience. A draft Bhutanese
E. JUVENILE JUSTICE

The comments made about the commercial law workshop apply as well to this workshop: Do the Bhutan authorities and UNDP perceive this as essentially a short course on juvenile justice, or a workshop on the problems of juvenile justice and juvenile justice law in the kingdom? What follows supposes the latter.

Participants. Relevant officials and perhaps representatives of civil society concerned with the issues. Academics, researchers, and media personnel concerned with issues of juvenile justice.

Preparation. If possible, perhaps some Bhutan participants might prepare a brief paper indicating the present status of juvenile justice in Bhutan.

Content. The drafters who participated in the March workshop might present for consideration their draft Bhutanese law on an aspect of juvenile law, accompanied by their research report. A foreign consultant could provide information relating to relevant foreign law and experience on the specific Bhutanese bill, as well as on the issues listed in the TOR.

Outcomes. A draft bill and research report, including relevant foreign law and
experience, for discussion and redrafting in light of Bhutanese circumstances. The participants could present the issues involved in establishing a juvenile justice system in Bhutan to the public through public meetings and the media. One group of participants might publish a booklet in Dzongkha on the subject.

III. PREPARING A MANUAL OF DRAFTING TECHNIQUES FOR BHUTAN

The TOR calls for three weeks’ additional work preparing a drafting manual for Bhutan. Working with Bhutan experts, we would be glad to participate in that effort. If the Bhutan participants find it useful, perhaps portions of our own drafting manual would serve as a basis for portions of Bhutan’s; it has so served elsewhere.

Most of the matters mentioned in the TOR (p. 3) concern matters that require resolution in any system. A drafting manual ought to contain, however, not only those matters, but also specific rules for using Dzongkha. For example, in English, ‘and’ and ‘or’ systematically overlap; there use causes considerable confusion. We are told that that confusion does not exist in French drafting. In English, a legislative sentence becomes more clear if adverbial or adjectival; phrases do not intervene between subject and verb, or between verb and object. English-speaking drafters learn these and a clutch of similar rules. So far as feasible, the Bhutan drafting manual should contain analogous rules applicable to Dzongkha. The Bhutanese experts assigned to work on the Manual should start collecting those rules as early as possible.
IV. RECRUITING CONSULTANTS

As we have done so elsewhere, we could help provide consultants in all these categories. By now, we have developed quite extensive networks for that purpose. In both China and Lao PDR, we undertook to provide three names of possible consultants from widely differing geographical areas, accompanied by brief descriptions, their resumes, and our own recommendations. As in those countries, the Bhutan authorities would make the final choice. We would recommend that the consultants either have at least ten years of experience in government in the field involved, or equivalent experience as an academic with a sound record of relevant publications.

V. BUDGET

This budget covers only the foreign exchange costs for ourselves for the four workshops.

January workshop:

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1 Because UNDP can sometimes get cheaper air fares, we do not include those here. We have only estimated -- probably on the high side -- the per diem costs of consultants. Therefore, we do not provide a total figure here. If you would like us to do so, please let us know.
two weeks @ $250, each per day for ten working days $5000

Per diem at the current rate; (estimated at about $100 each per day (?); 14 days $2800

Air fare; round trip, business class for trips over 9 hours

Legislative Drafting workshop

$250 each per day each for ten days $5000

Per diem at the current rate; (estimated at $100 each per day (?); 14 days $2800

Air fare; round trip, business class for trips over 9 hours

Legislative manual: 3 weeks

$250 per day each for 15 days $7500

Per diem at the current rate (estimated at $00 each per day); 21 days $4200

$29,300