Regulatory Analysis

Notice of Intended Action to be published: 281—Chapters 12, 14, and 36
"Technical Requirements of 2025 Iowa Acts, House Files 190, 316, and 835 and Senate File 278"

Iowa Code section(s) or chapter(s) authorizing rulemaking: 256.7

State or federal law(s) implemented by the rulemaking: 2025 Iowa Acts, House File 190; 2025 Iowa Acts, House File 316; 2025 Iowa Acts, House File 835; and 2025 Iowa Acts, Senate File 278

Public Hearing

A public hearing at which persons may present their views orally or in writing will be held as follows:

September 9, 2025 9 to 10 a.m.	Room B-50 Grimes State Office Building Des Moines, Iowa

Public Comment

Any interested person may submit written or oral comments concerning this Regulatory Analysis, which must be received by the Department of Education no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

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Purpose and Summary

This proposed rulemaking implements technical requirements of four statutes: 2025 Iowa Acts, House File 316 (career planning instruction in grades five through eight); 2025 Iowa Acts, House File 190 (online administration of statewide summative assessments for students receiving primarily online instruction); 2025 Iowa Acts, House File 835 (seizure training and prevention in schools); and 2025 Iowa Acts, Senate File 278 (authorizing the two athletics organizations to offer interscholastic competitions in robotics).

Analysis of Impact

1. **Persons affected by the proposed rulemaking:**

- **Classes of persons that will bear the costs of the proposed rulemaking:**

There are no identified costs of this proposed rulemaking.

- **Classes of persons that will benefit from the proposed rulemaking:**

Schools will benefit from the clarity of this proposed rulemaking.

2. **Impact of the proposed rulemaking, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred:**

- **Quantitative description of impact:**

Aside from the fiscal impact noted in the Fiscal Note accompanying 2025 Iowa Acts, House File 190, there is no noted quantitative impact.

- **Qualitative description of impact:**

Those governed by this proposed rulemaking will be qualitatively benefited by increased clarity.

3. **Costs to the State:**

- **Implementation and enforcement costs borne by the agency or any other agency:**

Aside from the fiscal impact noted in the Fiscal Note accompanying 2025 Iowa Acts, House File 190, there are no known costs to the State.

- **Anticipated effect on State revenues:**

There is no effect noted or anticipated.

4. **Comparison of the costs and benefits of the proposed rulemaking to the costs and benefits of inaction:**

Rulemaking is required to implement this legislation.

5. **Determination whether less costly methods or less intrusive methods exist for achieving the purpose of the proposed rulemaking:**

The circumstances require rulemaking.

6. **Alternative methods considered by the agency:**

- **Description of any alternative methods that were seriously considered by the agency:**

Not applicable.

- **Reasons why alternative methods were rejected in favor of the proposed rulemaking:**

The circumstances require rulemaking.

Small Business Impact

If the rulemaking will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rulemaking on small business:

- Establish less stringent compliance or reporting requirements in the rulemaking for small business.
- Establish less stringent schedules or deadlines in the rulemaking for compliance or reporting requirements for small business.
- Consolidate or simplify the rulemaking's compliance or reporting requirements for small business.
- Establish performance standards to replace design or operational standards in the rulemaking for small business.
- Exempt small business from any or all requirements of the rulemaking.

If legal and feasible, how does the rulemaking use a method discussed above to reduce the substantial impact on small business?

There is no anticipated impact on small business.

Text of Proposed Rulemaking

ITEM 1. Adopt the following **new** paragraph **12.5(3)"k"**:

k. Career planning and pathways. Instruction in career planning and pathways pursuant to Iowa Code section 256.11(3)*"a"*(11) as enacted by 2025 Iowa Acts, House File 316, is to be offered in grades five and six. This paragraph does not apply to accredited nonpublic schools.

ITEM 2. Amend paragraph **12.5(4)"i"** as follows:

i. Career ~~education~~ instruction, exploration, and development. Career ~~education~~ instruction, exploration, and development will include ~~exploration of employment opportunities, experiences in career decision making, and experiences to help students integrate work values and work skills into their lives~~ content specified in Iowa Code section 256.11(4)*"a"*(7) as enacted by 2025 Iowa Acts, House File 316. This paragraph does not apply to nonpublic schools. However, nonpublic schools will comply with subrule 12.5(7).

ITEM 3. Amend subparagraph **12.8(1)"h"(2)** as follows:

(2) ~~For the school year beginning July 1, 2018, and each succeeding school year, the~~ The statewide summative assessment referred in this paragraph is to meet all of the following provisions:

1. and 2. No change.

3. The assessment will be available for administration in both paper-and-pencil and computer-based formats and include assessments in mathematics, science, and English language arts, including reading and writing. For students receiving instruction primarily over the Internet from a school district, accredited nonpublic school, or charter school, a school or school district may administer any state-required assessment remotely pursuant to the terms of Iowa Code section 256.7(21)*"b"*(2)(e) as enacted by 2025 Iowa Acts, House File 190.

4. and 5. No change.

ITEM 4. Adopt the following **new** subrule 14.2(4):

14.2(4) *Seizure training and response.*

a. Each school district, accredited nonpublic school, or charter school shall adopt policies and implement seizure action plan and training requirements contained in Iowa Code section 280.13D as enacted by 2025 Iowa Acts, House File 835.

b. The state board of education shall adopt a seizure education program, which is to be consistent with standards of the Epilepsy Foundation of America. The department will post materials on the department's Internet site, educate.iowa.gov. Materials beyond what is required by paragraph 14.2(4)*"a"* are voluntary.

ITEM 5. Amend rule 281—36.2(280) as follows:

281—36.2(280) Registered organizations.

36.2(1) Organizations registered with the department include the following:

~~**36.2(1)**~~ *a.* Iowa High School Athletic Association (hereinafter association).

~~**36.2(2)**~~ *b.* Iowa Girls' High School Athletic Union (hereinafter union).

~~**36.2(3)**~~ *c.* Iowa High School Music Association (hereinafter music association).

~~**36.2(4)**~~ *d.* Iowa High School Speech Association (hereinafter speech association).

~~**36.2(5)**~~ *e.* Unified Iowa High School Activities Federation (hereinafter federation).

36.2(2) Organizations identified in paragraphs 36.2(1)*"a"* and *"b"* may sponsor interscholastic competitions related to robotics.