

COLLEGE STUDENT AID COMMISSION[283]

Regulatory Analysis

Notice of Intended Action to be published: 283—Chapter 10.2(256)
“Uniform Policies—Offer of Financial Aid”

Iowa Code section(s) or chapter(s) authorizing rulemaking: 256.178

State or federal law(s) implemented by the rulemaking: Iowa Code section 256.178

Public Hearing

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

October 20, 2026
3:30 p.m.

Room B50
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 College Student Aid Commission no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

Katrina Holck
Attorney 2
400 East 14th Street
Des Moines, Iowa 50319
Phone: 515.729.7449
Email: katrina.holck@iowa.gov

Purpose and Summary

The Commission proposes to amend Chapter 10 pursuant to 2026 Iowa Acts, House File 703. The purpose of this amendment is to add a definition of “offer of financial aid” (also referred to as “financial aid offer”) to Chapter 10. The amendment provides clarity and consistency in the interpretation and application of financial aid-related provisions administered by the Commission.

Analysis of Impact

1. Persons affected by the proposed rulemaking:

• Classes of persons that will bear the costs of the proposed rulemaking:

The Commission does not anticipate that the proposed amendment will impose additional costs on students, institutions, or other stakeholders. The amendment adds a definition to existing administrative rules and is not expected to create new compliance obligations or reporting requirements. Any administrative costs associated with updating materials or systems to reflect the new definition are expected to be minimal and absorbed within existing resources.

• Classes of persons that will benefit from the proposed rulemaking:

Students, postsecondary institutions, and other entities involved in the administration or receipt of financial aid will benefit from improved clarity and consistency in the definition of “offer of financial aid.” The Commission will also benefit from more consistent interpretation and application of financial aid-related provisions across programs.

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:**

The proposed amendment does not create or modify any appropriations, eligibility, requirements, or funding levels. The rulemaking is limited to the addition of a definitional term and is not expected to have any measurable fiscal impact on program expenditures, administrative costs, or the number of individuals served.

- **Qualitative description of impact:**

The proposed amendment is expected to improve clarity and consistency in the interpretation of financial aid-related terminology across Commission-administered programs. By defining “offer of financial aid,” the amendment supports uniform communication and reduces potential ambiguity in program administration.

3. Costs to the State:

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

The Commission does not anticipate significant implementation or enforcement costs associated with the proposed amendment. The rulemaking adds a definitional term to existing administrative rules and will be implemented using existing staff and resources. No additional costs to other State agencies are anticipated.

- **Anticipated effect on State revenues:**

The proposed amendment is not anticipated to have any effect on State revenues. The rulemaking adds a definition to administrative rules and does not create, modify, or eliminate any taxes, fees, or other revenue sources.

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

The proposed amendment is necessary to provide a clear and consistent definition of “offer of financial aid” within Commission rules. The benefits include improved clarity, consistency, and transparency in program administration.

The costs associated with the rulemaking are minimal and limited to administrative updates. Inaction could result in inconsistent interpretation of financial aid terminology across programs, potentially leading to confusion among students, institutions, and Commission staff. The Commission concludes that the benefits of the proposed rulemaking outweigh the minimal costs.

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

The Commission has determined that no less costly or less intrusive method exists to achieve the purpose of the proposed rulemaking. The amendment is narrowly tailored to implement statutory direction in 2026 Iowa Acts, House File 703, and add a definition necessary for consistent administration of Commission programs. No alternative approach would achieve the same level of clarity with fewer administrative actions.

6. Alternative methods considered by the agency:

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

No other methods were seriously considered by the Commission since the method proposed is a cost-efficient and seamless way to provide the information.

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

Alternative methods were rejected because the method used is a streamlined approach to illustrating the necessary information.

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?

The proposed rulemaking is not expected to have an impact on small business.

Text of Proposed Rulemaking

ITEM 1. Adopt the following new definition of “Offer of financial aid” in rule **283—10.2(256)**:

“*Offer of financial aid*” or “*financial aid offer*” means notices of eligibility for grants, loans, student employment or other assistance that are prepared based on a student’s submitted Free Application for Federal Student Aid, Iowa Financial Aid Application, or other application that is used to measure the financial need of an applicant.