Regulatory Analysis

Notice of Intended Action to be published: 283—Chapter 20
"Iowa National Guard Benefits Program"

Iowa Code section(s) or chapter(s) authorizing rulemaking: 256.178 and 2025 Iowa Acts, House File 117

State or federal law(s) implemented by the rulemaking: 2025 Iowa Acts, House File 117

Public Hearing

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

October 21, 2025 4 p.m.	Room B50 Grimes State Office Building Des Moines, Iowa

Public Comment

Any interested person may submit written 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:

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Bureau of Iowa College Aid
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Des Moines, Iowa 50319
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Purpose and Summary

The Commission proposes to amend Chapter 20 pursuant to 2025 Iowa Acts, House File 117. The proposed amendments add a definition for "educational programs" to clarify eligibility for scholarships and benefits and create a new Iowa National Guard Service Professional Qualification Scholarship designed to assist Guard members in pursuing professional credentials and qualifications necessary for specific occupations.

Analysis of Impact

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

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

In general, the proposed rulemaking is not expected to impose costs on individuals, institutions, or State agencies beyond what is already authorized by law.

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

Iowa National Guard members, eligible institutions, and the Commission will benefit from the rulemaking because it ensures that the Iowa Administrative Code aligns with the Iowa Code.

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 rulemaking does not impose measurable costs beyond those imposed by law.

- **Qualitative description of impact:**

The rulemaking does not impose measurable costs beyond those imposed by law.

3. **Costs to the State:**

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

The Commission would incur costs to administer the program through the Iowa College Aid Processing System (ICAPS). The costs will be covered by the Iowa National Guard.

- **Anticipated effect on State revenues:**

The proposed rulemaking is not anticipated to have any effect on State revenues beyond that of the legislation it is intended to implement.

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

The benefit of the proposed rulemaking is to ensure Chapter 20 aligns with the Iowa Code. The cost of inaction would be confusion caused by misalignment between Iowa Administrative Code and Iowa Code requirements.

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

No less costly methods exist.

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 the most cost-efficient and seamless for all entities involved.

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

The alternative methods were rejected because they would not correct the current misalignment between the Iowa Administrative Code and the Iowa Code.

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 "Educational program," in rule **283—20.1(256)**:

"Educational program" means a program of study that is approved by the adjutant general and leads to a credential as described in Iowa Code section 256.210A as enacted by 2025 Iowa Acts, House File 117.

ITEM 2. Adopt the following **new** rule 283—20.4(256):

283—20.4(256) Iowa national guard service professional qualification scholarship. In the event that the adjutant general authorizes the expenditure of unencumbered or unobligated funds from Iowa

Code section 256.210(6) to provide an eligible member of the Iowa national guard who is enrolled in an educational program that meets the criteria of section 256.210A as enacted by 2025 Iowa Acts, House File 117, this rule will be used to administer authorized scholarships. The adjutant general will select program recipients, select educational programs, and authorize scholarship awards under this rule. The decision of the adjutant general is final.

20.4(1) *Eligible applicant.* An eligible applicant is an Iowa resident, as determined by the adjutant general, who enrolls in an educational program at an eligible institution and who meets the award eligibility criteria approved by the adjutant general and the following provisions:

a. Completes the applications the Iowa national guard deems necessary on or before the date established by the Iowa national guard, except that an individual who was on federal active duty at the time of an application deadline will have 30 days to apply upon return to Iowa from active duty.

b. Meets the eligibility criteria in Iowa Code section 256.210A(2) as enacted by 2025 Iowa Acts, House File 117; meets satisfactory academic progress standards; and maintains satisfactory performance of duty upon return from initial active duty training, including attending a minimum of 90 percent of scheduled drill dates and attending annual training.

20.4(2) *Awarding of funds.*

a. *Selection criteria.* All eligible applicants will be considered for an award.

b. *Maximum award and extent of award.* The adjutant general will determine the amount and extent of awards eligible applicants can receive.

(1) The maximum award will not exceed the maximum award established by the adjutant general or the tuition and testing fees charged to the eligible applicant by the eligible institution, whichever is lower.

(2) Scholarship awards within a term of enrollment will be reported to the commission within the state-defined payment period.

c. *Awarding process.* The commission adopts the awarding process in paragraph 20.2(2)*"c"* with the following exceptions:

(1) In lieu of "Iowa Code section 256.210(5) in subparagraph 20.2*"c"*(4)", insert "paragraph 20.4(2)*"b"*".

(2) In lieu of "Iowa Code section 256.210" in subparagraph 20.2(2)*"c"*(7), insert "Iowa Code section 256.210A as enacted by 2025 Iowa Acts, House File 117".

These rules are intended to implement 2025 Iowa Acts, House File 117.