

Red Tape Review Rule Report (Due: September 1, 2025)

Department Name:	Iowa Department of Education – Bureau of Iowa College Aid	Date:	12/31/2024	Total Rule Count:	11
IAC #:	283	Chapter/ SubChapter/ Rule(s):	Chapter 18	Iowa Code Section Authorizing Rule:	256.178 and 256.206
Contact Name:	Todd Brown	Email:	Todd.brown@iowa.gov	Phone:	515-210-7670

PLEASE NOTE, THE BOXES BELOW WILL EXPAND AS YOU TYPE

What is the intended benefit of the rule?

Iowa residents, eligible institutions, and the Commission will benefit from the rulemaking since it clarifies the consistent processes by which Iowans will apply for and qualify for the work study program, while also illustrating the duties of the eligible institutions, the Commission, and applicants in the administration of the program. The rulemaking leverages administrative procedures already in place at the federal level for the Federal Work Study Program, to ensure consistency and efficiency in the administration of the program by institutions for students.

In addition, the rulemaking ensures the integrity of the program through periodic compliance reviews and the application process for institutions to participate in the program.

Is the benefit being achieved? Please provide evidence.

The benefit of the rule is achieved, as each of the processes and provisions intended to provide a benefit are illustrated within the rulemaking.

What are the costs incurred by the public to comply with the rule?

Since the rulemaking leverages existing administrative requirements in the Federal Work Study Program, the costs incurred by the public are expected to be as minimal as possible.

What are the costs to the agency or any other agency to implement/enforce the rule?

Compliance reviews: Compliance reviews are performed at the institution-level, covering all state-funded financial aid programs in which the institution disburses funds. Since the review itself covers multiple programs, the College Student Aid Commission can't assign a direct cost to a specific program. Although, staff spend an estimated cumulative total of 40 hours on a compliance review for an institution; a fraction of which could be assigned to a specific program. Data obtained from institutions suggests that institutional staff spend under 10 hours collecting the required documents, transmitting them to the College Student Aid Commission, answering questions, responding to findings, and developing corrective action plans; again, a fraction of which could be assigned to an individual program. The proposed rulemaking requires an applicant institution to apply by October 1 prior to the academic year in which the institution plans to participate in the program. This application deadline will allow the Commission adequate time to update systems, train institutional staff who will be involved in the administration of the program, and for students who may attend the applicant institution to apply for funding.

Do the costs justify the benefits achieved? Please explain.

The costs justify the benefits achieved. The cost of inaction would be confusion in the process and criteria to be used in the application and awarding of funds under the program and the administrative requirements of the program. In addition, the potential for awarding errors and irregularities that would remain unchecked without periodic compliance reviews.

Are there less restrictive alternatives to accomplish the benefit? YES NO

If YES, please list alternative(s) and provide analysis of less restrictive alternatives from other states, if applicable. If NO, please explain.

The Commission has not identified a more cost effective alternative to the current internal process utilized for compliance reviews. Existing staff within the agency perform the compliance reviews, and the internal time commitment isn't such that outsourcing the compliance reviews would result in the elimination of agency staff – outsourcing would only lead to additional costs born to an external service provider.

In addition, the rulemaking provides consistency related to general student eligibility criteria across state financial aid programs and consistent administrative processes between the Iowa Work Study Program and the Federal Work Study Program, allowing for more efficient eligibility determinations and awarding of funds.

Does this chapter/rule(s) contain language that is obsolete, outdated, inconsistent, redundant, or unnecessary language, including instances where rule language is duplicative of statutory language? [list chapter/rule number(s) that fall under any of the above categories]

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Much of the language within each rule was condensed or eliminated because it was redundant of Iowa Code. The following rules were eliminated entirely.

18.4 – consolidated into a different rule within the chapter.

18.5 - obsolete rule.

18.6 - obsolete rule.

18.7 – redundant rule.

18.8 - consolidated into a different rule within the chapter.

18.9 - consolidated into a different rule within the chapter.

18.10 – redundant of Iowa Code.

18.11 - consolidated into a different rule within the chapter.

RULES PROPOSED FOR REPEAL (list rule number[s]):

18.5, 18.6, 18.7, 18.10

RULES PROPOSED FOR RE-PROMULGATION (list rule number[s] or include rule text if available):

***For rules being re-promulgated with changes, you may attach a document with suggested changes.**

METRICS

Total number of rules repealed:

7

Proposed word count reduction after repeal and/or re-promulgation	186
Proposed number of restrictive terms eliminated after repeal and/or re-promulgation	26

ARE THERE ANY STATUTORY CHANGES YOU WOULD RECOMMEND INCLUDING CODIFYING ANY RULES?

CHAPTER 18
IOWA WORK STUDY PROGRAM

283—18.1(256) Basis of aid. Assistance available under the Iowa work study program is based on the financial need of Iowa residents enrolled at eligible postsecondary education institutions.

283—18.2(256) Definitions.

“Eligible postsecondary education institution” means the same as defined in Iowa Code section 256.207 and subrule 18.6.

“Financial need” means the same as defined in 283—Chapter 10.

“Financial metric” means the same as defined in 283—Chapter 10.

“Full-time” means the same as defined in 283—Chapter 10.

“Iowa resident” means the same as defined in 283—Chapter 10.

“Part-time” means enrollment in at least 6 but less than 12 hours per semester or the equivalent. *“Program of study”* means the same as defined in 283—Chapter 10.

“Satisfactory academic progress” means the same as defined in 283—Chapter 10.

283—18.3(256) Administrative procedures.

18.3(1) Alignment with federal work-study regulations. To facilitate efficient administration, the commission hereby adopts the federal work-study regulations found at 34 CFR 675, subpart A, as of July 1, 2024. Provisions of the federal regulations adopted include:

1. Selection of students for employment (§675.10),
2. Payments to students (§675.16),
3. Fiscal procedures and records (§675.19),
4. General employment conditions for institutional employment, including civil rights requirements, state worker compensation laws, and social security requirements (§675.20(c)-(d)),
5. Institutional employment (§675.21),
6. Wage administration (§675.24).

18.3(2) No transfer of funds. An eligible postsecondary education institution must administer state-funded work-study funds for Iowa residents in the same manner as it administers its federal work-study program, except that state funds may not be transferred to other student aid programs or across state fiscal years.

18.3(3) Employment restrictions. The creation of work-study opportunities will not result in the displacement of employed workers or impair or affect existing contracts for services, and the funding used by an eligible postsecondary education institution will supplement and not supplant jobs and existing financial aid programs provided to students.

283—18.4(256) Eligible applicant. An eligible applicant is an Iowa resident enrolled full-time or part-time in a program of study at an eligible postsecondary education institution and employed at an eligible postsecondary education institution and who meets the program eligibility criteria in Iowa Code Section 256.208 and the provisions in “1” and “2”.

1. Completes the Free Application for Federal Student Aid and any other application the eligible postsecondary education institution deems necessary on or before the date established by the eligible postsecondary education institution.
2. Establishes financial need, has an eligible financial metric, meets satisfactory academic progress standards, and does not meet a condition in IAC 283 10.3(1).

283—18.5(256) Awarding of funds.

18.5(1) Selection criteria. Eligible postsecondary education institutions will document the consistent processes by which they select eligible applicants to receive awards.

18.5(2) Maximum award. The maximum award for full-time students will not exceed the student’s financial need.

18.5(3) Awarding process.

a. The commission will provide notice of the eligibility criteria, distribute funding allocations, and request acceptance of the funding allocation from each eligible postsecondary education institution annually. Eligible postsecondary education institutions will accept or decline the funding allocation by the deadline established by the commission.

b. Funding allocations that are declined or unspent by the date the commission deems necessary will be reallocated to participating eligible postsecondary education institutions.

c. Eligible postsecondary education institutions will notify recipients of the awards, clearly indicating the award amount and the state program from which funding is being provided and stating that the award is contingent on the availability of state funds.

d. Eligible postsecondary education institutions will distribute awards as eligible applicants complete their employment obligations.

e. Eligible postsecondary education institutions will provide information about the awards earned by eligible applicants to the commission in a format specified by the commission at the end of each semester, or the equivalent. If all allocated funds are not spent by an eligible postsecondary education institution by the end of the year, those unspent funds may be deducted from the eligible postsecondary education institution's subsequent allocation.

f. Eligible postsecondary education institutions are responsible for completing necessary verification and for coordinating other aid to ensure compliance with student eligibility criteria and allowable award amounts. Eligible postsecondary education institutions will report changes in student eligibility to the commission.

283—18.6(256) Eligible postsecondary education institution eligibility.

18.6(1) Application. A non-participating eligible postsecondary education institution will request participation using the commission's designated application. The institution will meet the eligibility criteria in Iowa Code Section 256.207 at the time the application is submitted.

18.6(2) Deadline to apply. Non-participating eligible postsecondary education institutions seeking to participate in the Iowa work study program will submit applications on or before October 1 of the year prior to the beginning of the academic year for which they are applying for participation.

18.6(3) Compliance audits. The commission will periodically investigate and review compliance of eligible postsecondary education institutions participating in this program with the criteria established in Iowa Code Section 256 and this rule. If the commission finds that an eligible postsecondary education institution fails to comply with the provisions of Iowa Code Section 256.206 through 256.209 or this rule, participation in the Iowa work study program may be suspended.