Rule Impact Statement

Title 610. State Regents for Higher Education
Chapter 25. Student Financial Aid and Scholarships
Permanent Rules under OKLA. ADMIN. CODE

This Rule Impact Statement has been prepared pursuant to 75 O.S.Supp.2025, § 303(D).

I. Statement of Need and Legal Basis

The proposed revisions are intended to support the State Regents' goal of increasing the number of college graduates in Oklahoma by clarifying and modernizing the administration of Oklahoma's Promise. The amendments address areas in which existing procedures or eligibility provisions may be unclear, outdated, or difficult to apply consistently across varying applicant circumstances.

By making eligibility requirements, documentation expectations, application deadlines, verification procedures, and related standards more explicit, the proposed amendments should reduce ambiguity for students, parents, participating institutions, and OSRHE staff. These changes will promote more consistent eligibility determinations, reduce the risk of differing interpretations, and lessen unnecessary administrative burden while preserving the integrity and statutory purpose of the Oklahoma's Promise program.

The legal basis for the proposed amendments is the State Regents' statutory authority under 70 O.S. §§ 2603, 3204, and 3206 to adopt rules governing the administration of the Oklahoma Higher Learning Access Program, also known as Oklahoma's Promise.

II. Classification of the rule(s) and justification for classification.

Nonmajor rules. The proposed rules are classified as nonmajor rules because they are not expected to result in additional annual implementation or compliance costs, increase fees, create new funding obligations, or impose new regulatory requirements on business entities, political subdivisions, or individuals. The proposed amendments primarily clarify and modernize existing Oklahoma's Promise eligibility, application, documentation, verification, and administrative procedures. Because the revisions are intended to improve consistency and administrability within the existing program framework, they are not expected to have a significant economic impact.

Description of the proposed rule(s).

The proposed rule changes are intended to support the State Regents' goal of increasing the number of college graduates in Oklahoma by clarifying and modernizing the administration of Oklahoma's Promise. The amendments address areas in which existing procedures or eligibility provisions may be unclear, outdated, or difficult to apply consistently across varying applicant circumstances.

By making eligibility requirements, documentation expectations, application deadlines, verification procedures, and related standards more explicit, the proposed amendments should reduce ambiguity for students, parents, participating institutions, and OSRHE staff. These changes will promote more consistent eligibility determinations, reduce the risk of

differing interpretations, and lessen unnecessary administrative burden while preserving the integrity and statutory purpose of the Oklahoma's Promise program.

III. Description of the classes of persons who most likely will be affected by the proposed rule(s), including classes that will bear the costs of the proposed rule(s), and any information on cost impacts received by the agency from any private or public entities.

The classes of persons most likely to be affected by the proposed rules include current and prospective Oklahoma's Promise applicants, their parents, custodial parents, or permanent guardians, students educated by other means, students in Department of Human Services custody or other qualifying custody arrangements, children of certified classroom teachers, participating public and private schools, school site contacts, eligible postsecondary institutions, and OSRHE staff responsible for program administration. The proposed amendments are not expected to impose costs on these classes of persons because the revisions primarily clarify existing eligibility, application, documentation, verification, and administrative requirements. No information regarding cost impacts has been received by the agency from any private or public entities.

IV. Description of the classes of persons who will benefit from the proposed rule(s).

The classes of persons who will benefit from the proposed rules include current and prospective Oklahoma's Promise applicants, their parents, custodial parents, permanent guardians, participating public and private schools, school site contacts, eligible postsecondary institutions, and OSRHE staff responsible for program administration. These groups will benefit from clearer eligibility, application, documentation, verification, and deadline requirements, which should reduce confusion, support more consistent eligibility determinations, and improve the overall administration of the program.

V. Comprehensive analysis of the rules' economic impact.

The proposed rule changes should have a neutral economic impact and do not involve fee changes.

VI. Detailed explanation of methodology and assumptions used to determine the economic impact.

The economic impact determination was based on a review of the proposed amendments, existing program requirements, and current administrative processes for Oklahoma's Promise. The amendments primarily clarify eligibility standards, application procedures, documentation requirements, verification processes, and related administrative provisions, and do not create new fees, change benefit amounts, expand statutory funding obligations, or impose new compliance costs on applicants, institutions, political subdivisions, or business entities. Based on those assumptions, the proposed rules are expected to have a neutral economic impact and can be implemented within existing program resources and administrative procedures.

VII. Determination of whether implementation of the proposed rule(s) will have an economic impact on any political subdivisions or require their cooperation in implementing or enforcing the rule(s).

Implementation of the proposed rules is not expected to have an economic impact on political subdivisions. A "political subdivision" is defined under the Administrative Procedures Act as "a county, city, incorporated town or school district within this state." 75 O.S. § 250.3. Although public school districts may continue to assist students and families by providing information, verifying school-related information, or transmitting application materials in the ordinary course of program administration, the proposed amendments do not impose new funding obligations, require political subdivisions to expend additional funds, or require their cooperation in enforcing the rules. Any involvement by school districts is expected to be consistent with existing Oklahoma's Promise administrative processes.

VIII. Determination of whether implementation of the proposed rule(s) may have an adverse economic effect on small business as provided by the Oklahoma Small Business Regulatory Flexibility Act.

After consideration with reference to Section 303(A)(4) and 303(B)(6) of Title 75, it is believed that the proposed rules will have no adverse impact upon Small Business.

IX. Measures taken to minimize the cost and impact of the proposed rule on business and economic development in this state, local government units of this state, and individuals.

The proposed amendments minimize cost and impact by clarifying existing eligibility, application, documentation, verification, and deadline requirements rather than creating new fees, benefit obligations, or compliance mandates. The revisions are intended to allow Oklahoma's Promise to be administered through existing OSRHE processes and resources, while reducing confusion, inconsistent determinations, and unnecessary administrative burden for students, families, institutions, and school districts. Because the amendments do not regulate business activity or impose new operational requirements on local government units or private entities, no adverse impact on business or economic development is anticipated.

X. Determination of the effect of the proposed rule(s) on the public health, safety and environment and, if the proposed rule(s) is/are designed to reduce significant risks to the public health, safety and environment, an explanation of the nature of the risk and to what extent the proposed rule will reduce the risk.

The proposed amendments will have no effect on the public health, safety, and environment.

XI. Determination of any detrimental effect on the public health, safety and environment if the proposed rule(s) is/are not implemented.

No effect on the public health, safety, or the environment will result if the proposed rules are not implemented.

XII. Analysis of Alternatives to Adopting the Rule(s)

These amendments are necessary to clarify and modernize administration of the Program. Absent these amendments, participants and program administrators may be adversely affected by outdated procedures, ambiguous eligibility and benefit requirements, inconsistent program administration, and increased administrative inefficiencies that could hinder the effective operation of the program.

XIII. Estimated Time Spent by State Employees to Develop Rule and Other Resources Used in Developing Rule

Development of the proposed amendments required more than one week of state employee time and resources, including legal review, program analysis, drafting revisions, and preparation of rulemaking documents.

XIV. Summary and Preliminary Comparison of Any Existing or Proposed Federal Regulations Intended to Address the Activities to be Regulated by Proposed Administrative Rules

There are no existing or proposed federal regulations known to directly regulate the activities addressed by these proposed amendments. The amendments concern the administration of a state scholarship and do not conflict or duplicate federal regulatory requirements.

XV. Date the rule impact statement was prepared and if modified, the date modified.

Prepared by the Oklahoma State Regents for Higher Education on July 29, 2026.