

INSPECTIONS AND APPEALS DEPARTMENT[481]

Notice of Intended Action

**Proposing rulemaking related to behavioral health professionals licensing
and providing an opportunity for public comment**

The Department of Inspections, Appeals, and Licensing hereby proposes to amend Chapter 880, “Behavioral Health Professionals Licensing,” Iowa Administrative Code.

Legal Authority for Rulemaking

This rulemaking is proposed under the authority provided in Iowa Code chapters 147H, 154C, and 154D and sections 147I.1, 272C.3, and 272C.10.

State or Federal Law Implemented

This rulemaking implements, in whole or in part, Iowa Code chapters 17A, 147, 147H, 147I, 154C, 154D, and 272C.

Purpose and Summary

The proposed amendments define the requirements for participation in the Professional Counselors Licensure Compact, commonly known as the Counseling Compact; define participation in the Social Work Licensure Compact; add background check requirements for all existing mental health counselor license holders; add background check requirements for all social workers; add background check requirements during license reactivation when a license has been inactive for two or more years and the licensee cannot provide evidence of active practice in another state; add a fee for the issuance of a compact privilege to practice in Iowa; and waive the compact privilege fee for an active duty military member or spouse.

Regulatory Analysis

A Regulatory Analysis for this rulemaking was published in the Iowa Administrative Bulletin on February 18, 2026. A public hearing was held on the following date(s):

- March 10, 2026

Fiscal Impact

This rulemaking has no fiscal impact to the State of Iowa.

Jobs Impact

After analysis and review of this rulemaking, no impact on jobs has been found.

Waivers

Any person who believes that the application of the discretionary provisions of this rulemaking would result in hardship or injustice to that person may petition the Behavioral Health Professionals Board for a waiver of the discretionary provisions, if any, pursuant to 481—Chapter 6.

Public Comment

Any interested person may submit written comments concerning this proposed rulemaking, which must be received by the Board no later than 4:30 p.m. on May 19, 2026. Comments should be directed to:

Emily DeRonde
Department of Inspections, Appeals, and Licensing

6200 Park Avenue
Des Moines, Iowa 50321
Email: emily.deronde@dia.iowa.gov

Public Hearing

No public hearing is scheduled at this time. As provided in Iowa Code section 17A.4(1)“b,” an oral presentation regarding this rulemaking may be demanded by 25 interested persons, a governmental subdivision, the Administrative Rules Review Committee, an agency, or an association having 25 or more members.

Review by Administrative Rules Review Committee

The Administrative Rules Review Committee, a bipartisan legislative committee which oversees rulemaking by executive branch agencies, may, on its own motion or on written request by any individual or group, review this rulemaking at its [regular monthly meeting](#) or at a special meeting. The Committee’s meetings are open to the public, and interested persons may be heard as provided in Iowa Code section 17A.8(6).

The following rulemaking action is proposed:

ITEM 1. Amend rule 481—880.1(148,154B,154C,154D), introductory paragraph, as follows:

481—880.1(148,154B,154C,154D) Definitions. For purposes of these rules, the following definitions shall apply:

ITEM 2. Adopt the following **new** definitions of “DCI,” “Department,” “FBI” and “NACES” in rule **481—880.1(148,154B,154C,154D)**:

“*DCI*” means the division of criminal investigation.

“*Department*” means the department of inspections, appeals, and licensing.

“*FBI*” means the Federal Bureau of Investigation.

“*NACES*” means the National Association of Credential Evaluation Services.

ITEM 3. Amend paragraph **880.2(1)“b”** as follows:

b. The applicant for a mental health counseling license shall submit ~~two completed fingerprint cards and a signed waiver form~~ required waivers and fingerprints pursuant to the board-approved process to facilitate a national criminal history background check by the ~~Iowa division of criminal investigation (DCI) and the Federal Bureau of Investigation (FBI).~~ The cost of the criminal history background check by the DCI and the FBI shall be assessed to the applicant.

ITEM 4. Reletter paragraphs **880.2(7)“b”** to **880.2(7)“g”** as **880.2(7)“c”** to **880.2(7)“h”**.

ITEM 5. Adopt the following **new** paragraph **880.2(7)“b”**:

b. The applicant for a social worker license shall submit required waivers and fingerprints pursuant to the board-approved process to facilitate a national criminal history background check by the DCI and the FBI. The cost of the criminal history background check by the DCI and the FBI shall be assessed to the applicant.

ITEM 6. Amend relettered paragraph **880.2(7)“c”** as follows:

c. No application will be considered by the board until official copies of academic transcripts have been received by the board except as provided in paragraph ~~880.2(7)“g.”~~ 880.2(7)“h.”

ITEM 7. Amend relettered paragraph **880.2(7)“h”** as follows:

h. In lieu of the requirements in paragraphs ~~880.2(7)“b”~~ 880.2(7)“c” and ~~“e,” “d,”~~ the board will accept the ASWB Social Work Registry verification of academic transcripts and verification of licensure in other states.

ITEM 8. Amend paragraph **880.4(5)“c”** as follows:

c. Foreign-trained social workers shall provide an equivalency evaluation of their educational credentials by International Education Research Foundation, Inc., Credentials Evaluation Service, P.O. Box 3665, Culver City, California 90231-3665, telephone 310.258.9451, website www.ierf.org or email at info@ierf.org; or obtain a certificate of equivalency from the Council on Social Work Education, 1701 Duke Street, Suite 200, Alexandria, Virginia 22314-3457, telephone 703.683.8080, website www.cswe.org; or obtain a certificate of equivalency from an evaluation service with membership in NACES at www.naces.org or a credential evaluation service approved by the board. The professional curriculum must be equivalent to that stated in these rules. The applicant shall bear the expense of the curriculum evaluation.

ITEM 9. Adopt the following **new** paragraph **880.10(2)“c”**:

c. Complete a compact eligibility review. This rule applies to mental health counselor licensees who were licensed prior to enactment of this rule unless this was completed at the time of initial licensure. In order to complete the compact eligibility review, at or prior to the licensee’s next renewal, the licensee must submit required waivers and fingerprints pursuant to the board-approved process to facilitate a national criminal history background check. The cost for the evaluation of the fingerprint packet and the DCI and the FBI criminal history background checks will be assessed to the applicant. The board may withhold issuing a license pending receipt of a report from the DCI and the FBI.

ITEM 10. Rescind rule 481—880.14(17A,147,272C) and adopt the following **new** rule in lieu thereof:

481—880.14(17A,147,272C) License reactivation for mental health counselors, marital and family therapists, psychologists, and social workers. To apply for reactivation of an inactive license, a licensee shall:

880.14(1) Submit a reactivation application.

880.14(2) Pay the reactivation fee that is due as specified in 481—Chapter 507.

880.14(3) Provide verification of license from the jurisdiction in which the applicant has been most recently licensed, sent directly from the jurisdiction to the board office. The applicant must also disclose any public or pending complaints against the applicant in any other jurisdiction. Web-based verification may be substituted for verification directly from the jurisdiction’s board office if the verification provides:

- a. Licensee’s name;
- b. Date of initial licensure;
- c. Current licensure status; and
- d. Any disciplinary action taken against the license.

880.14(4) For mental health counseling and marriage and family therapy licenses:

a. Provide verification of a current active license in another jurisdiction at the time of application, or

b. Provide verification of completion of continuing education taken within two years prior to the application for reactivation.

(1) If the license has been inactive for less than five years, the applicant must submit verification of 40 hours of continuing education.

(2) If the license has been inactive for more than five years, the applicant must submit verification of 80 hours of continuing education.

c. If the mental health counseling license has been inactive for two or more years and the licensee cannot provide verification of active practice, consisting of a minimum of 2,080 hours, in another state or jurisdiction during the two years preceding an application for reactivation, submit required waivers and fingerprints pursuant to the board-approved process to facilitate a national criminal history background check. The cost for the evaluation of the fingerprint packet and the DCI and the FBI criminal history background checks will be assessed to the licensee. The board may withhold reactivation of a license pending receipt of a report from the DCI and the FBI.

880.14(5) For psychology licenses, provide verification of a current active license in another jurisdiction at the time of application or verification of completion of continuing education taken within

two years of the application. If the license has been inactive for less than five years, the applicant must submit verification of 40 hours of continuing education, and if the license has been inactive for more than five years, the applicant must submit verification of 80 hours of continuing education.

880.14(6) For social work licenses, provide:

a. Verification of completion of 27 hours of continuing education within two years of application for reactivation or verification of active practice, consisting of a minimum of 2,080 hours, in another state or jurisdiction during the two years preceding an application for reactivation.

b. If the license has been on inactive status for more than five years, the verification in paragraph 880.14(6)“*a*” and one of the following:

(1) Verification of passing the ASWB examination within the last five years at the appropriate or higher level as follows:

1. Bachelor-level social worker—the bachelor’s level examination;
2. Master-level social worker—the master’s level examination; or
3. Independent-level social worker—the clinical level examination.

(2) Verification of continued social work practice at the appropriate or higher level in another state for a minimum of two years immediately preceding the application for reactivation.

(3) If the social work license has been inactive for two or more years and the licensee cannot provide verification of active practice, in accordance with subparagraph 880.14(6)“*b*”(2), in another state or jurisdiction during the two years preceding an application for reactivation, required waivers and fingerprints pursuant to the board-approved process to facilitate a national criminal history background check. The cost for the evaluation of the fingerprint packet and the DCI and the FBI criminal history background checks will be assessed to the applicant. The board may withhold issuing a license pending receipt of a report from the DCI and the FBI.

ITEM 11. Amend rule 481—880.18(147) as follows:

481—880.18(147) Professional counselor licensing compact. The rules of the Counseling Compact Commission are incorporated by reference. A mental health counselor may engage in the practice of licensed mental health counseling in Iowa without a license issued by the board if the individual has a current compact privilege to practice in Iowa issued by the counseling compact. The state fee for issuance of a compact privilege to practice in Iowa shall be \$60, which will be collected by the counseling compact. The state fee for issuance of a compact privilege to practice in Iowa shall be waived for an active-duty military member or spouse of an individual who is an active-duty military member. A mental health counselor who practices mental health counseling in Iowa using a compact privilege is subject to the rules governing licensees in this chapter and in 481—Chapters 881, 882, 884, and 885. Complaints, investigations, and disciplinary proceedings involving a compact privilege shall be handled in accordance with Iowa Code chapters 17A, 147H, and 272C and 481—Chapters 503, 504, and 506.

This rule is intended to implement Iowa Code chapter 147H.

ITEM 12. Renumber rule **481—880.19(154D)** as **481—880.20(154D)**.

ITEM 13. Adopt the following **new** rule 481—880.19(147):

481—880.19(147) Professional social worker licensing compact (SWLC). The rules of the SWLC are incorporated by reference. A social worker may engage in the practice of licensed social work in Iowa without a license issued by the board if the individual has a current compact privilege to practice in Iowa issued by the social work licensure compact. The state fee for issuance of a compact privilege to practice in Iowa shall be \$60, which will be collected by the social work licensure compact. The state fee for issuance of a compact privilege to practice in Iowa shall be waived for an active duty military member or spouse of an individual who is an active duty military member. A social worker who practices social work in Iowa using a compact privilege is subject to the rules governing licensees in this chapter and in 481—Chapters 881, 882, 884, and 885. Complaints, investigations, and disciplinary proceedings involving a compact privilege shall be handled in accordance with Iowa Code chapters 17A, 147I, and 272C and 481—Chapters 503, 504, and 506.

This rule is intended to implement Iowa Code chapter 147I.