

INSPECTIONS AND APPEALS DEPARTMENT[481]

Adopted and Filed

Rulemaking related to the occupational therapy licensure compact

The Department of Inspections, Appeals, and Licensing hereby amends Chapter 804, “Licensure of Occupational Therapists and Occupational Therapy Assistants,” Iowa Administrative Code.

Legal Authority for Rulemaking

This rulemaking is adopted under the authority provided in Iowa Code chapter 148B and sections 147E.1, 272C.3 and 272C.10.

State or Federal Law Implemented

This rulemaking implements, in whole or in part, Iowa Code chapters 17A, 147, 148B and 272C and section 147E.1.

Purpose and Summary

These amendments define the requirements for participation in the Occupational Therapy Licensure Compact; add background check requirements for initial licensure, licensure by endorsement, and license reactivation for all occupational therapist (OT) and occupational therapist assistant (OTA) applicants; 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.

Public Comment and Changes to Rulemaking

Notice of Intended Action for this rulemaking was published in the Iowa Administrative Bulletin on July 9, 2025, as **ARC 9393C**. A public hearing was held on the following date(s):

- August 11, 2026

An Amended Notice of Intended Action was published in the Iowa Administrative Bulletin on January 21, 2026, as **ARC 9988C**. A public hearing was held on the following date(s):

- February 10, 2026

Public comments were received. Five individuals were present for the hearing.

A member of the public supported the new rules and the beneficial impact for Iowa patients and providers, especially in rural areas

Two members of the professional associations were opposed to mandating background checks for all licenses and cited concerns about licensure delays for new applicants and temporary license holders.

After consideration of these comments and review of Iowa Code section 147E.1, the Board of Physical and Occupational Therapy determined that the proposed rules are necessary and will not impact temporary license holders since temporary license holders are not compact-eligible. The Department has effective and efficient processes in place to expedite background checks and comply with the law. The public will be informed of this rule change, anticipated to take effect July 1, 2027, through public announcements via GovDelivery, during Board meetings, via the website and via email to licensees.

No changes from the Notice have been made.

Adoption of Rulemaking

This rulemaking was adopted by the Board on June 12, 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 Board for a waiver of the discretionary provisions, if any, pursuant to 7—Chapter 2504.

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).

Effective Date

This rulemaking will become effective on July 1, 2027.

The following rulemaking action is adopted:

ITEM 1. Adopt the following **new** definitions of “DCI” and “FBI” in rule **481—804.1(147)**:

“DCI” means the Iowa division of criminal investigation.

“FBI” means the Federal Bureau of Investigation.

ITEM 2. Renumber subrules **804.2(3)** to **804.2(4)** as **804.2(4)** to **804.2(5)**.

ITEM 3. Adopt the following **new** subrule 804.2(3):

804.2(3) 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 4. Renumber rules **481—804.4(147)** to **481—804.9(17A,147,272C)** as **481—804.5(147)** to **481—804.10(17A,147,272C)**.

ITEM 5. Adopt the following **new** rule 481—804.4(147E):

481—804.4(147E) Occupational therapy licensure compact. The rules of the occupational therapy compact commission are incorporated by reference. An occupational therapist or occupational therapist assistant may engage in the practice of occupational therapy in Iowa without a license issued by the board if the individual has a current compact privilege to practice in Iowa issued by the occupational therapy compact commission. The state fee for issuance of a compact privilege to practice in Iowa shall be \$60, which will be collected by the occupational therapy compact commission. 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. An occupational therapist or occupational therapist assistant who practices occupational therapy in Iowa using a compact privilege is subject to the rules governing licensees in this chapter and in 481—Chapters 806 and 807. Complaints, investigations, and disciplinary proceedings involving a compact privilege shall be handled in accordance with Iowa Code chapters 17A and 272C; Iowa Code section 147E.1; and 481—Chapters 503, 504, and 506.

This rule is intended to implement Iowa Code section 147E.1.

ITEM 6. Adopt the following **new** subrule 804.8(9):

804.8(9) Compact eligibility review. This rule applies to licensees who were licensed prior to adoption of this rule. In order to complete the compact eligibility review, at or prior to the next renewal, a 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 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 FBI.

ITEM 7. Adopt the following **new** subrule 804.9(4):

804.9(4) If the 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 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 FBI.

ITEM 8. Amend renumbered rule 481—804.10(17A,147,272C) as follows:

481—804.10(17A,147,272C) License reinstatement. A licensee whose license has been revoked, suspended, or voluntarily surrendered must apply for and receive reinstatement of the license in accordance with rule 481—506.31(272C) and must apply for and be granted reactivation of the license in accordance with rule 481—804.8(17A,147,272C) 481—804.9(17A,147,272C) prior to practicing occupational therapy in this state.

[Filed 7/27/26, effective 7/1/27]

[Published 8/19/26]

EDITOR'S NOTE: For replacement pages for IAC, see IAC Supplement 8/19/26.