

**BEFORE THE NURSING HOME ADMINISTRATOR BOARD
OF THE STATE OF IOWA**

**In the Matter of the
Petition for Rule Waiver by:**

Elizabeth Greene

Petitioner.

ORDER DENYING WAIVER

Pursuant to Iowa Code section 17A.9A and Iowa Administrative Code rule 481—6.5, the Iowa Board of Nursing Home Administrators (“Board”) makes the following ruling on the Petition for Waiver submitted by Elizabeth Greene (“Petitioner”).

FACTS AND COURSE OF PROCEEDINGS

1. Petitioner submitted a Petition for Waiver on or about October 7, 2025.
2. Petitioner seeks to waive Iowa Administrative Code rule 481—980.2(3)(c), which requires that an applicant for licensure complete 2,080 hours of long-term health care administration or health-care-related experience in a nursing home.
3. At the time Petitioner submitted the Petition for Waiver, rule 481—980.2(3)(c) read in part:

481—980.2(155) Requirements for licensure. The following criteria shall apply to licensure:

480—980.2(3) Provide verification of the following:

[...]

c. Completion of one of the following: (1) Administrator training program supervised by a preceptor who meets the requirements outlined in rule 481—980.4(155); (2) Practicum in long-term health care completed through an accredited college or university; or (3) 2,080 hours of long-term health care administration or health-care-related experience in a nursing home.
4. Petitioner is seeking a nursing home administrator license in Iowa. She possesses a bachelor’s degree in healthcare administration and a Master’s degree in healthcare administration. She has also worked as a CNA. She currently has a provisional license and works as a Provisional Administrator in a long-term care facility.
5. Petitioner is seeking a waiver of a portion of the hours of experience required for licensure.

6. The Board considered the Petition for Waiver at its meeting on October 13, 2025.

APPLICABLE LAW

7. Pursuant to Iowa Administrative Code chapter 481—6.5, the Board may in its sole discretion issue an order waiving in whole or in part the requirements of a rule if the board finds, based on clear and convincing evidence, all of the following:
 - a. The application of the rule would impose an undue hardship on the person for whom the waiver is requested;
 - b. The waiver from the requirements of the rule in the specific case would not prejudice the substantial legal rights of any person;
 - c. The provisions of the rule subject to the petition for waiver are not specifically mandated by statute or another provision of law; and
 - d. Substantially equal protection of public health, safety, and welfare will be afforded by a means other than that prescribed in the particular rule for which the waiver is requested.
8. “The burden of persuasion rests with the Petitioner to demonstrate by clear and convincing evidence that the board should exercise its discretion to grant a waiver from a board rule.” Iowa Admin. Code r. 481—6.11(2).
9. “The final decision on whether the circumstances justify the granting of a waiver shall be made at the sole discretion of the board, upon consideration of all relevant factors.” Iowa Admin. Code r. 481-6.11(1). “Each petition for a waiver shall be evaluated by the board based on the unique, individual circumstances set out in the petition.” *Id.* at. 481-6.11(5)(a). “A waiver, if granted, shall provide the narrowest exception possible to the provisions of a rule.” *Id.* at. 481-6.11(5)(b).

ANALYSIS OF WAIVER CRITERIA

Whether the application of the rule would create an undue hardship on the person for whom the waiver is requested:

10. The Board finds that application of the rule would not create an undue hardship for the Petitioner. The Petitioner may still obtain the hours required by rule, and may do so while on provisional license.

Whether the waiver from the requirements of the rule in the specific case would prejudice the substantial legal rights of any person:

11. The Board finds that granting the waiver would not prejudice the substantial legal rights of any person.

Whether the provision of the rule subject to the petition for waiver is not specifically mandated by another provision of law:

12. The requirement found in the Board's administrative rule is not specifically mandated by statute.

Whether substantially equal protection of the public health, safety, and welfare will be afforded by a means other than that prescribed in the particular rule for which the waiver is requested:

13. The Board is concerned about the public health, safety, and welfare and the negative impact of waiving the rule that requires experience for licensure.

**PETITIONER HAS NOT MET THE CRITERIA TO WAIVE RULE 481—980.2(3)(c).
THE RULE WAIVER IS DENIED.**

Upon review of the Petition, the Board finds that Petitioner has not satisfied the four criteria for waiver of the experience requirements for licensure.

IT IS THEREFORE ORDERED the Petition for Waiver of the requirement to provide verification of experience in a nursing home for licensure as a Nursing Home Administrator under Iowa Administrative Code rule 481—902.2(3)(c) is hereby **DENIED**.

Issued January 5, 2026.



Chair, Iowa Board of Nursing Home Administrators