

**BEFORE THE BOARD OF BEHAVIORAL HEALTH PROFESSIONALS OF  
THE STATE OF IOWA**

<b>In the Matter of the Petition for Waiver by:</b>  <b>Rebekah Cheevers</b>  <b>Petitioner.</b>	<b>ORDER APPROVING WAIVER REQUEST</b>
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Pursuant to Iowa Code section 17A.9A and Iowa Administrative Code (“IAC”) rule 481—6, the Iowa Board of Behavioral Health Professionals (“Board”) makes the following ruling on the Petition for Waiver submitted by Rebekah Cheevers (“Petitioner”).

**FINDINGS OF FACT**

1. Petitioner is seeking to obtain her license as an Iowa licensed mental health counselor.
2. Petitioner has been licensed as an Iowa temporary mental health counselor since April 2024.
3. Petitioner states in her Petition for Waiver that she seeks to waive 481 IAC 880.7(1) “b” which provides:
  - b.Duration.* The supervised clinical experience must be for a minimum of two years.
4. Petitioner is specifically requesting the Board allow her to utilize a time period of January 1, 2024 thru April 23, 2024 where applicant practiced as an addiction counselor. While employed as an addiction counselor, Petitioner had received her certification from NBCC.
5. The Board considered the Petition for Waiver at a board meeting on November 25, 2025.

**APPLICABLE LAW**

6. Pursuant to Iowa Administrative Code chapter 481—6.1(3), 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.
7. “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.” 481 IAC 6.1(8)(b).
  8. The Board's rules provide “The final decision on whether the circumstances justify the granting of a waiver is at the discretion of the [board] upon consideration of all relevant factors. Each petition for a waiver will be evaluated by the [board] based on the unique, individual circumstances set out in the petition.” 481 IAC 6.1(8)(a).
  9. “A waiver, if granted, shall provide the narrowest exception possible to the provisions of a rule.” 481 IAC 6.1(8)(f).

#### ANALYSIS OF WAIVER CRITERIA

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

Requiring petitioner to complete an additional 3 months of supervision would cause an undue hardship on the Petitioner. Prior to August of 2025, the Board rules allowed for employment as an addiction counselor with certification from NBCC to count towards the supervision hours. Petitioner began her employment as an addiction counselor in January of 2024, when this rule was in place. **Whether the waiver from the requirements of the rule in the specific case would prejudice the substantial legal rights of any person:**

10. Waiving the requirements of the rule 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:**

11. 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:**

12. The public health, safety and welfare will be afforded by other means if this waiver is granted because supervision hours as an addiction counselor certified by

the NBCC were allowed to be counted toward the total supervision hours prior to the 2025 rule changes which followed the merger of the behavioral health boards. Since this was allowed during the time the supervision hours were completed, there is no harm to the public to count those hours now.

### CONCLUSIONS OF LAW

For the reasons set forth above and upon review of the Petition, the Board finds that Petitioner has satisfied the four criteria for waiver set forth in IAC 481—6.1(3).

### ORDER

**IT IS THEREFORE ORDERED** the Petition for Waiver of 481 IAC 880.7(1)"b" is APPROVED.

Issued November 25, 2025.

*Aaron L. Culley, L.I.S.W.*

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Aaron Culley  
Chairperson  
Iowa Board of Behavioral Health Professionals