

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

**IN THE MATTER OF
ROCHEAN COFIELD
PETITIONER**

**ORDER DENYING
WAIVER REQUEST**

Pursuant to Iowa Code section 17A.9A and Iowa Administrative Code (“IAC”) rule 7 — 2504, the Iowa Board of Behavioral Health Professionals (“Board”) makes the following ruling on the Petition for Waiver submitted by Rochean Cofield (“Petitioner”).

FINDINGS OF FACT

1. Petitioner is seeking to obtain her Iowa independent social worker license.
2. Petitioner has been licensed as a masters level social worker since February 2019.
3. Petitioner states in her Petition for Waiver that she seeks to waive 481 IAC 880.3(3) “c” which provides:
 - c. The ASWB passing score will be utilized as the Iowa passing score.
4. The Board considered the Petition for Waiver at a board meeting on July 28, 2026.

APPLICABLE LAW

5. Pursuant to Iowa Code section 17A.9A(2), the [Board] may in its sole discretion issue a waiver from 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 pose an undue hardship on the person for whom the waiver is requested;
 - b. The waiver from the requirements of a 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.

6. Pursuant to Iowa Administrative Code section 17A.9A(3), the burden of persuasion rests with the person who petitions [a Board] for the waiver of a rule.
7. Iowa Code section 17A.9A(3) further states that each petition for a waiver shall be evaluated by the [Board] based on the unique, individual circumstances set out in the petition [and that] a waiver, if granted, shall be drafted by the [Board] so as to provide the narrowest exception possible to the provisions of the rule.

ANALYSIS OF WAIVER CRITERIA

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

1. The Petitioner indicates repeated exam attempts have imposed a substantial financial hardship, as well as taking an emotional and psychological toll. The Board did not find undue hardship. Iowa requires passing the ASWB clinical exam for licensed independent level social workers. Applicant is not barred from continuing to practice at the masters level.

Whether the waiver from the requirements of a rule in the specific case would not prejudice the substantial legal rights of any person:

2. Waiving the requirements of the rule would not prejudice the substantial legal rights of any person.

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

3. 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:

4. Protection of the public health, safety, and welfare will not be afforded by other means because the exam verifies baseline readiness and competence for independent level practice.

CONCLUSIONS OF LAW

Upon review of the Petition and for the reasons set forth above, the Board finds that Petitioner has not satisfied the four criteria for waiver set forth in Iowa Code section 17A.9A.

ORDER

IT IS THEREFORE ORDERED the Petition for Waiver of Iowa Administrative Code 481 – 880.3(3)(c) is **DENIED**.

Issued July 28, 2026.

Aaron L. Culley, LISW

Aaron Culley, LISW
Chairperson
Iowa Board of Behavioral Health Professionals