



## Iowa Board of Behavioral Science Guidance Related to Governor Reynold's Proclamations & COVID-19

On March 22, 2020, Governor Kim Reynolds issued a Proclamation of Emergency Disaster. In this Proclamation, Governor Reynolds temporarily suspended a number of regulatory provisions applicable to a number of professions including those professions regulated by the Board of Behavioral Science. The Proclamation eases administrative rules relating to continuing education, renewal of licenses, internship requirements, and licensure requirements for out-of-state providers. *The suspension of rules identified in the Proclamation is effective through April 30, 2020, unless the Governor terminates or extends the Proclamation.* As required in the Proclamation, the Board hereby issues this guidance relating to the temporary suspension of administrative rules in these areas which directly impact the Board of Behavioral Science.

**SECTION FIVE.** Pursuant to Iowa Code§ 29C.6(6) .and Iowa Code§ 135.144(3), and in conjunction with the Iowa Department of Public Health, I temporarily suspend the regulatory provisions of Iowa Code chapters 80A, 88A, 88B, 89, 89A, 90A, 91C, 99D, 99F, 100C, 100D, 101A, 103, 105, 124, 126, 135, 136B, 136C, 147, 147A, 147B, 148, 148A, 148B, 148C, 148E,148F, 149,151,152, 152A, 152B, 152C, 152D, 153, 154, 154A, 154B, 154C, 154D, 154E,154F, 155, 155A, 156, 157, 158, 159, 169, 192, 206, 272, 272C, 321, 441, 455B, 459B, 481A,502, 522B, 535B, 542, 542B, 543B, 543D, 544A, 544B, 544C, and any provisions of the Iowa Administrative Code implementing those chapters, to the extent they impose requirements for in-person continuing education as a condition of professional license renewal or impose continuing education deadlines or requirements that are unable to be satisfied due to this Disaster Emergency. Suspension of these provisions shall extend through the duration of this Proclamation and any future extension of this suspension. I hereby direct all regulatory agencies or boards governed by these provisions to provide additional guidance to licensees regarding the effect of these suspensions.

**In Section Five,** Governor Reynolds temporarily suspends rules relating to continuing education deadlines or requirements as a condition of license renewal, reinstatement, or reactivation.

Licensees are already allowed to obtain all of the required continuing education hours online. Due to MHC and MFT licenses not expiring until September 30, 2020, the required continuing education hours for license renewal are not being waived at this time. Licensees will still be required to obtain 40 hours. The Board will continue to monitor this issue and provide additional guidance as the window for compliance narrows.

Licensed Behavior Analysts and Assistant Behavior Analysts are not affected by Section Five as the Board does not review or require continuing education for license renewal.

**SECTION SIX.** Pursuant to Iowa Code § 29C.6(6), I temporarily suspend the regulatory provisions of Iowa Code chapters 80A, 88A, 88B, 89, 89A, 90A, 91C, 99D, 99F, 100C, 100D, 101A, 103, 105, 124, 126, 135, 136B, 136C, 147, 147A, 147B, 148, 148A, 148B, 148C, 148E, 148F, 149, 151, 152, 152A, 152B, 152C, 152D, 153, 154, 154A, 154B, 154C, 154D, 154E, 154F, 155, 155A, 156, 157, 158, 159, 169, 192, 272, 272C, 321, 441, 455B, 459B, 481A, 502, 522B, 535B, 542, 542B, 543B, 543D, 544A, 544B, 544C, and any provisions of the Iowa Administrative Code implementing those chapters, to the extent they set an expiration date or renewal requirement for a professional license that expires during the duration of this Proclamation. Suspension of these provisions shall extend through the duration of this Proclamation and any future extension of this suspension. I hereby direct all regulatory agencies or boards governed by these provisions to provide additional guidance to licensees regarding the effect of these suspensions.

**In Section Six,** Governor Reynolds temporarily suspends rules relating to license renewal. The suspension only applies to licenses which expire between March 22 and April 30, 2020.

At this time, MHC and MFT licenses are not set to expire during the Proclamation. Therefore, the Board does not anticipate any changes to the current renewal schedules and deadlines for MHC and MFT licenses.

For Behavior Analysts and Assistant Behavior Analysts, if your license is scheduled to expire while the Proclamation is in effect, you are not required to renew your license for the duration of the Proclamation. You will have 30 days after the Proclamation expires to renew your license without penalty. The Board office is able to process renewal applications at this time, so you may renew your license while the Proclamation is in effect.

**SECTION SEVEN.** Pursuant to Iowa Code § 29C.6(6), I temporarily suspend the regulatory provisions of Iowa Admin. Code 281-79.16(4)(a), 645-31.6(2)(b)(1-2), 645-280.6(3), 645-240.6(2), 657-4.3, 645-300.3(4)(b)(2), 300.6(3)(a), and 300.6(3)(d), requiring the completion of clinical, practical, or internship experience as a condition of obtaining professional licensure to be a school administrator, mental health counselor, independent social worker, psychologist, pharmacist, or speech pathologist or audiologist. Suspension of these provisions shall extend through the duration of this Proclamation and any future extension of this suspension. I hereby direct all regulatory agencies or boards governed by these provisions to provide additional guidance to licensees regarding the effect of these suspensions.

**In Section Seven,** Governor Reynolds temporarily suspends rules relating to internships that may have been cut short due to the emergency.

Applicants for MHC licensure who graduate from non-CACREP accredited programs whose internship was cut short due to the emergency will still be considered for license equivalency. Applicants will still be required to meet all other license requirements and should still follow the standard process of submitting documentation for an equivalency evaluation to CCE. If the

internship is deficient when evaluated by CCE as a direct result of the emergency, the Board will extend licensure to applicants who completed the majority of the internship requirements.

**SECTION FIFTEEN.** Pursuant to Iowa Code § 29C.6(6,) I temporarily suspend the regulatory provisions of Iowa Admin. Code 645-280.2 and 645-31.18, to the extent that they require out-of-state marital, family therapy, and mental health counselors, or social workers who provide services by telephone or other electronic means to individuals in the State of Iowa to be licensed in Iowa.

**In Section Fifteen,** Governor Reynolds temporarily suspends rules requiring licensure for out-of-state providers.

For the duration of the Proclamation, individuals who are licensed as mental health counselors and marital and family therapists in another state, whose license is in good standing, may provide services to Iowans through electronic means without obtaining a license from the Board.