

**BEFORE THE SIGN LANGUAGE INTERPRETER AND TRANSLITERATOR BOARD
OF THE STATE OF IOWA**

<p>In the Matter of the Petition for Rule Waiver by:</p> <p>Jaimie Feltman</p> <p>Petitioner.</p>	<p>ORDER GRANTING WAIVER</p>
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Pursuant to Iowa Code section 17A.9A and Iowa Administrative Code rule 481—6.5, the Iowa Board of Sign Language Interpreters and Transliterators (“Board”) makes the following ruling on the Petition for Waiver submitted by Jaimie Feltman (“Petitioner”).

FACTS AND COURSE OF PROCEEDINGS

1. Petitioner submitted a Petition for Waiver on or about May 18, 2025.
2. Petitioner seeks to waive Iowa Administrative Code rule 481—961.6(3)(b)(2), verification of completion of 80 hours of continuing education within two years of application for reactivation.
3. At the time Petitioner submitted her Petition for Waiver, 481—961.6(3)(b)(2) read in part:

480—961.6 To apply for reactivation of an inactive license, a licensee needs to:

961.6(3) Provide verification of current competence to practice sign language interpreting or transliterating by satisfying one of the following criteria:

[...]

b. If the license has been on inactive status for more than five years, an applicant must provide the following:

(2) Verification of completing 80 hours of continuing education within two years of the application for reactivation.
4. Petitioner is seeking reactivation of her Iowa license for her new employment. Within two years of her application for reactivation, she has completed 47.5 continuing education hours out of the 80 hours required by the administrative rule in question.
5. Petitioner allowed her Iowa license to go inactive in 2015 because she no longer needed it as part of her employment. Since that time, she has maintained her RID certification and South Dakota licensure and has fulfilled continuing education required by those entities. She has been

practicing in another state during the period that her license was inactive in Iowa.

6. The Board considered the Petition for Waiver at its meeting on August 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. Petitioner has been consistently employed as a sign language interpreter since her Iowa license became inactive. She has completed RID and South Dakota continuing education requirements and has over 40 hours of continuing education within the past two years. She has developed substantial knowledge and skills through her work experience. She has been hired by a company that requires an Iowa sign language interpreter license to provide services in the state. Requiring Petitioner to complete the additional education prior to reactivating her license would create an undue hardship for the Petitioner in expense and time.

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

11. Petitioner believes waiving the requirement of 80 continuing education hours in the past two years would not prejudice the substantial legal rights of any other person due to her compliance with RID and South Dakota education requirements, extensive experience including working as a sign language interpreter during the time her Iowa license was inactive, and compliance with all other license reactivation requirements. Waiving the requirements of this rule for Petitioner 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:

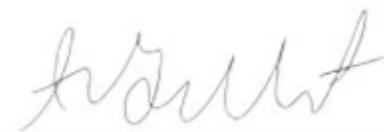
13. The public health, safety, and welfare will not be adversely affected by granting this waiver. The Board has reason to believe Petitioner has all relevant education and experience to practice as a sign language interpreter with reasonable skill and safety. She has completed over 40 hours of continuing education within the past two years, which is the requirement for reactivation of a license that has been inactive for five years or less.

PETITIONER HAS MET THE CRITERIA TO WAIVE RULE 481—961.6(3)(b)(2).

Upon review of the Petition, the Board finds that Petitioner has satisfied the four criteria for waiver of the requirement that an applicant for license reactivation must complete 80 hours of continuing education within the two years preceding the application.

IT IS THEREFORE ORDERED the Petition for Waiver of the requirement to complete 80 hours of continuing education during the two year period prior to application for reactivation under Iowa Administrative Code rule 481—961.6(3)(b)(2) is hereby **GRANTED**. The waiver shall be valid indefinitely.

Issued October 22, 2025.



Chair, Board of Sign Language Interpreters and Transliterators