

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

<p><b>In the Matter of the Petition for Rule Waiver by:</b></p> <p><b>Julia Rabe,</b></p> <p><b>Petitioner.</b></p>	<p><b>ORDER DENYING WAIVER</b></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 Julia Rabe (“Petitioner”).

**FACTS AND COURSE OF PROCEEDINGS**

1. Petitioner submitted a Petition for Waiver on or about August 15, 2025.
2. Petitioner seeks to waive Iowa Administrative Code rule 481—961.6(3)(b)(3), the requirement to retake the examination due to an inactive license.
3. At the time Petitioner submitted her Petition for Waiver, Iowa Administrative Code rule 481—961.6(3)(b)(3) read, in relevant 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:

(3) Verification of a current certification as identified in subrule 961.2(1), or of passing an examination identified in subrule 961.2(1), which was passed after the license became inactive[...]
4. The rule also requires verification of active practice, consisting of a minimum of 2,080 hours, in another state or jurisdiction during the two years preceding an application for reactivation. Iowa Administrative Code rule 481—961.6(3)(b)(4). Petitioner has not completed these hours.
5. Petitioner is seeking reactivation of her Iowa license. She is not licensed in any other state.

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 states that retaking the exam would create a hardship due to the time and expense of completing that requirement. The Board finds that the Petitioner has the ability to complete the exam as required by rule, and that application of the rule would not create an undue hardship on the Petitioner.

#### **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 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:**

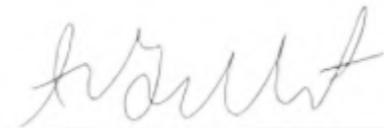
13. The public health, safety, and welfare may be adversely affected by granting this waiver. Because the Petitioner has been out of practice for several years, the Board believes that the public would be best served by Petitioner retaking the exam as required by rule.

**PETITIONER HAS NOT MET THE CRITERIA TO WAIVE RULE 481—961.6(3)(b)(3).**

Upon review of the Petition, the Board finds that Petitioner has not satisfied the four criteria for waiver of the requirement that an applicant for license reactivation retake the exam. Further, the Petitioner has not completed the requirements of 481—961.6(3)(b)(4).

**IT IS THEREFORE ORDERED** the Petition for Waiver of Iowa Administrative Code rule 481—961.6(3)(b)(3) is hereby **DENIED**.

Issued October 23, 2025.



Chair, Board of Sign Language Interpreters and Transliterators