

**BEFORE THE PHARMACY BOARD OF THE STATE OF IOWA**

<p><b>In the Matter of the Petition for Waiver by:</b></p> <p><b>Amany Ali Alowaisi Registration #: 8710</b></p> <p><b>Petitioner.</b></p>	<p><b>ORDER GRANTING WAIVER REQUEST</b></p>
--	---

Pursuant to Iowa Code section 17A.9A and 481 Iowa Administrative Code (“IAC”) 6, the Iowa Board of Pharmacy (“Board”) makes the following ruling on the Petition for Waiver submitted by Amany Ali Alowaisi (“Petitioner”).

**FINDINGS OF FACT**

1. Petitioner has an Iowa pharmacist-intern registration that was issued December 23, 2024 and is set to expire on December 23, 2025.
2. Petitioner is working as a pharmacist intern and is a full time PhD student in the College of Pharmacy at the University of Iowa.
3. Petitioner states in her Petition for Waiver that she seeks to waive 657 IAC 4.7, but the current Board rules that govern this waiver are:
  - a. 481 IAC 551.6(2) which states that the internship registration will expire one year following graduation from a college of pharmacy.
  - b. 481 IAC 552.7 which requires an internship to include no fewer than 1,500 hours of pharmacy practice experience.
4. Petitioner is specifically requesting to renew her internship registration in order to have more time to complete her required 1,500 internship hours.
5. The Board considered the Petition for Waiver at a board meeting on November 5, 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 department upon consideration of all relevant factors. Each petition for a waiver will be evaluated by the department 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:**

10. Application of the rule (i.e. requiring Petitioner to complete the 1,500 hours within the one year when her pharmacist-intern registration is active, or not extending her internship registration) would create an undue hardship on Petitioner as she does not have time to complete the 1,500 hours before her registration expires on December 23, 2025.

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

11. 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:**

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 be afforded by other means if this waiver is granted at this time. The Petitioner still needs to complete the 1,500 hours required but will have additional time to do so and a waiver provides substantial equal protection of the public health, safety, and welfare.

### 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 481 IAC 6.1(3).

### ORDER

**IT IS THEREFORE ORDERED** the Petition for Waiver of 481 Iowa Administrative Code chapter 551.6(2) is GRANTED to renew and extend Petitioner's internship registration through February 28, 2026.

Issued November 5, 2025.



---

Erik Maki, PharmD  
Chairperson  
Iowa Board of Pharmacy

Copy to:  
Katrina Phillip  
Assistant Attorney General  
Iowa Department of Justice  
Office of the Iowa Attorney General  
1305 E. Walnut Street, 2<sup>nd</sup> Floor  
Des Moines, Iowa 50309  
[katrina.phillip@ag.iowa.gov](mailto:katrina.phillip@ag.iowa.gov)

PLEASE NOTE: If you require the assistance of auxiliary aids or services to participate in this matter because of a disability, immediately call 515-281-0233. (If you are hearing impaired, call Relay Iowa TTY at 1-800-735-2942).