

**BEFORE THE SIGN LANGUAGE INTERPRETERS AND TRANSLITERATORS
BOARD OF THE STATE OF IOWA**

**In the Matter of the
Petition for Rule Waiver by:**

JEANNIE OLDFATHER

Petitioner.

ORDER GRANTING WAIVER

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 Jeannie Oldfather (“Petitioner”).

FACTS AND COURSE OF PROCEEDINGS

1. Petitioner submitted a Petition for Waiver on or about October 4, 2025.
2. Petitioner seeks to waive Iowa Administrative Code rule 481—961.6(3)(4), which requires proof of 2,080 hours of practice in another state to apply for reactivation.
3. At the time Petitioner submitted the Petition for Waiver, rule 481—961.6(3)(4) read in part:

481—961.6(17A,147,272C) License reactivation. To apply for reactivation of an inactive license, a licensee needs to:

[...]

481—961.6(3) Provide verification of current competence to practice sign language interpreting or transliterating by satisfying one of the following criteria: a. If the license has been on inactive status for five years or less, an applicant must provide the following:

[...]

(4) 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.

4. Petitioner is seeking reactivation of her sign language interpreter license. Her license expired in June of 2025. Because she was on a break from her job as a substitute interpreter in a school, she missed the renewal period and very narrowly missed the grace period permitted for renewal of her license. She is about 100 hours short of the requirement to show 2,080 hours of experience, and her practice was in Iowa prior to

her license expiring, not another state. She does also maintain an active license in Arkansas.

5. The Board considered the Petition for Waiver at its meeting on October 27, 2025.

APPLICABLE LAW

6. 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.
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.” Iowa Admin. Code r. 481—6.11(2).
8. “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:

9. The Board finds that application of the rule would create an undue hardship for the Petitioner because she would be required to complete additional hours of experience.

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

10. The Board finds that Petitioner’s experience working, active licensure in another state and

narrowly missing the license renewal window are sufficient to waive the rule. The Board finds that granting the waiver will 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:

11. 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:

12. 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 experience to practice as a sign language interpreter with reasonable skill and safety.

PETITIONER HAS MET THE CRITERIA TO WAIVE RULE 481—961.6(3)(4). THE RULE WAIVER IS GRANTED.

Upon review of the Petition, the Board finds that Petitioner has satisfied the four criteria for waiver of the educational requirements for licensure.

IT IS THEREFORE ORDERED the Petition for Waiver of the requirement to provide verification of 2,080 hours of experience in another state for reactivation of Petitioner's sign language interpreter license under Iowa Administrative Code rule 481—961.6(3)(4) is hereby **GRANTED**. The waiver shall be valid indefinitely.

Issued January 2, 2026.



Chair, Iowa Board of Sign Language Interpreters and Transliterators