

**STATE OF IOWA
BOARD OF EDUCATIONAL EXAMINERS
701 E. Court Ave., Suite A
Des Moines, Iowa 50309**

Minutes

December 19, 2025

The Board of Educational Examiners (Board or BoEE) held a meeting on December 19, 2025. Chad Janzen, Board Chair, called the meeting to order at 8:30 a.m. Members attending were Kathy Behrens, Pam Bleam, Miranda Brus, Eric St Clair, Dr. Michael Pyevich (8:36 a.m. arrival), Dr. Daniel Zylstra, Paige Thorson, and Jennifer Sammons. Also in attendance was Mike Cavin, Executive Director, Beth Myers, Attorney, Lori Lavorato, William Rector and Matthew Barron, Investigators, Lindsey Browning, Assistant Attorney General. Dr. Davis Eidahl was unable to attend.

Kathy Behrens moved, with a second by Eric St Clair, to approve the agenda. **MOTION CARRIED UNANIMOUSLY**

Eric St Clair moved, with a second by Kathy Behrens to approve the consent agenda (minutes for November 14, 2025). **MOTION CARRIED UNANIMOUSLY.**

Public comment was made by Nathan Arnold, attorney with Professional Educators of Iowa.

Eric St Clair moved, with a second by Kathy Behrens, that the Board go into closed session for the purpose of discussing closed session minutes whether to initiate licensee disciplinary proceedings, the decision to be rendered in a contested case, confidential health information, and mental health information, pursuant to Iowa Code sections 21.5(1)(a), (d), and (f). Roll call vote: Behrens – yes; Bleam – yes; Brus – yes; Janzen – yes; St Clair – yes; Pyevich – yes; Zylstra – yes; Thorson – yes; Sammons – yes: **MOTION CARRIED UNANIMOUSLY**

33

1 The Board returned to open session at 11:05 a.m.

2

3 Kathy Behrens moved, with a second by Daniel Zylstra that in **case number 25-184**,
4 the Board return the complaint and investigative report to the investigator to gather
5 further information, and return the case to the Board for further consideration.

6 **MOTION CARRIED UNANIMOUSLY**

7

8 Miranda Brus moved, with a second by Paige Thorson that in **case number 25-231**
9 the Board find probable cause to establish a violation of the Code of Professional
10 Conduct and Ethics, 282 IAC rules 25.3(1) e (4) (2) & (3), and order the Board staff to
11 proceed with the case. **MOTION CARRIED UNANIMOUSLY**

12

13 Kathy Behrens moved, with a second by Paige Thorson that in **case number 25-225**,
14 the Board find probable cause to establish a violation of the Code of Professional
15 Conduct and Ethics, 282 IAC rules 282 IAC rules 25.3(2) b, and order the Board staff
16 to proceed with the case. Roll call vote: Behrens – yes; Bleam – yes; Brus -recused;
17 Janzen – yes; St Clair – yes; Pyevich – yes; Thorson – yes; Sammons – yes; Zylstra –
18 yes; **MOTION CARRIED**

19

20 Paige Thorson moved, with a second by Kathy Behrens, that in **case number 25-241**,
21 the Board find probable cause to establish a violation of the Code of Professional
22 Conduct and Ethics, 282 IAC rule 25.3(2) b, and order the Board staff to proceed with
23 the case. **MOTION CARRIED UNANIMOUSLY**

24

25 Kathy Behrens moved, with a second by Eric St Clair, that in **case number 25-150**,
26 the Board find probable cause to establish a violation of the Code of Professional
27 Conduct and Ethics, 282 IAC rules 25.3(3) e, 25.3(6) m, and 25.3(8) a, and order the
28 Board staff to proceed with the case. **MOTION CARRIED UNANIMOUSLY**

29

30 Eric St Clair moved, with a second by Daniel Zylstra that in **case number 25-206**,
31 find that, although one or more of the allegations in the complaint may be
32 substantiated by the witnesses interviewed in the course of the investigation [and/or]
33 the documents gathered in the course of the investigation, and the allegations may

1 constitute a technical violation of the board's statute or administrative rules; the
2 evidence before the board indicates that adequate steps have been taken to remedy
3 the violation and to ensure that incidents of a similar nature do not occur in the
4 future. The Board will not pursue formal disciplinary action in this matter. **MOTION**

5 **CARRIED UNANIMOUSLY**

6

7 Jennifer Sammons moved, with a second by Daniel Pyevich that in case number 25-
8 209, the Board find probable cause to establish a violation of the Code of Professional
9 Conduct and Ethics, 282 IAC rules 25.3(3) e, and order the Board staff to proceed with
10 the case. **MOTION CARRIED UNANIMOUSLY**

11

12 Daniel Zylstra moved, with a second by Miranda Brus, that in case number 25-224,
13 the Board find probable cause to establish a violation of the Code of Professional
14 Conduct and Ethics, 282 IAC rules 25.3(3) e, and order the Board staff to proceed with
15 the case. **MOTION CARRIED UNANIMOUSLY**

16

17 Kathy Behrens moved, with a second by Jennifer Sammons, that in case number 25-
18 227 the Board find probable cause to establish a violation of the Code of Professional
19 Conduct and Ethics, 282 IAC rules 25.3(3) e, and order the Board staff to proceed with
20 the case. **MOTION CARRIED UNANIMOUSLY**

21

22 Eric St Clair moved, with a second by Miranda Brus, that in case number 25-229, the
23 Board find probable cause to establish a violation of the Code of Professional Conduct
24 and Ethics, 282 IAC rule 25.3(3) a, and order the Board staff to proceed with the case.

25 **MOTION CARRIED UNANIMOUSLY**

26

27 Michael Pyevich moved, with a second by Kathy Behrens, that in case number 25-208
28 the Board find probable cause to establish a violation of the Code of Professional
29 Conduct and Ethics, 282 IAC rule 25.3(5) a (2), and order the Board staff to proceed
30 with the case. **MOTION CARRIED UNANIMOUSLY**

31

32 Paige Thorson moved, with a second by Jennifer Sammons, that in case number 25-
33 214, the Board find probable cause to establish a violation of the Code of Professional

1 Conduct and Ethics, 282 IAC rule 25.3(5) a (2), and order the Board staff to proceed
2 with the case. Roll call vote: Behrens – yes; Bleam – yes; Brus - recused; Janzen – yes;
3 St Clair – yes; Pyevich – yes; Thorson – yes; Sammons – yes; Zylstra – yes; **MOTION**
4 **CARRIED**

5

6 Paige Thorson moved, with a second by Michael Pyevich, that in **case number 25-195**,
7 the Board find probable cause to establish a violation of the Code of Professional
8 Conduct and Ethics, 282 IAC rule 25.3(8) a, and order the Board staff to proceed with
9 the case. Roll call vote: Behrens – no; Bleam – yes; Brus - recused; Janzen – no; St
10 Clair – yes; Pyevich – yes; Zylstra – yes; Thorson – yes; Sammons – no;; **MOTION**

11 **CARRIED**

12

13 Eric St Clair moved, with a second by Pam Bleam, that in **case number 25-197**, the
14 Board finds that the evidence gathered in the investigation, including witness
15 statements and the documentary evidence, does not substantiate the allegations in the
16 complaint, and that the Board therefore lacks probable cause to proceed with this
17 matter. **MOTION CARRIED UNANIMOUSLY**

18

19 Pam Bleam moved, with a second by Eric St Clair, that in **case number 25-205**, the
20 Board finds probable cause to establish a violation of the Code of Professional Conduct
21 and Ethics, 282 IAC rule 25.3(6) c, d, 25.3(8) a, and order the Board staff to proceed
22 with the case. **MOTION CARRIED UNANIMOUSLY**

23

24 Jennifer Sammons moved, with a second by Kathy Behrens, that in **case number 25-**
25 **226**, the Board finds probable cause to establish a violation of the Code of Professional
26 Conduct and Ethics, 282 IAC rule 25.3(6) c & 25.3(8) b, and order the Board staff to
27 proceed with the case. **MOTION CARRIED UNANIMOUSLY**

28

29 Paige Thorson moved, with a second by Daniel Zylstra, that in **case number 25-235**,
30 the Board finds that the evidence gathered in the investigation, including witness
31 statements and the documentary evidence, does not substantiate the allegations in the
32 complaint, and that the Board therefore lacks probable cause to proceed with this
33 matter. **MOTION CARRIED UNANIMOUSLY**

1
2 Michael Pyevich moved, with a second by Kathy Behrens, that in case number 25-
3 236, the Board finds that the evidence gathered in the investigation, including witness
4 statements and the documentary evidence, does not substantiate the allegations in the
5 complaint, and that the Board therefore lacks probable cause to proceed with this
6 matter. **MOTION CARRIED UNANIMOUSLY**

7
8 Kathy Behrens moved, with a second by Jennifer Sammons, that the Board accept the
9 respondent's waiver of hearing and voluntary surrender in case number 25-182 and
10 that the Board issue an order permanently revoking the license with no possibility of
11 reinstatement. **MOTION CARRIED UNANIMOUSLY**

12
13 Eric St Clair moved, with a second by Michael Pyevich, that in case number 25-244,
14 the Board finds probable cause to establish a violation of the Code of Professional
15 Conduct and Ethics, 282 IAC rule 25.3 (1) e (4) 2 & 3, 25.3(1) e (5), and accept the
16 respondent's waiver of hearing and voluntary surrender and that the Board issue an
17 order permanently revoking the license with no possibility of reinstatement. **MOTION**
18 **CARRIED UNANIMOUSLY**

19
20 Michael Pyevich moved, with a second by Paige Thorson, that in case number 25-193,
21 the Board finds probable cause to establish a violation of the Code of Professional
22 Conduct and Ethics, 282 IAC rule 25.3(1) b (2), and accept the respondent's waiver of
23 hearing and voluntary surrender and that the Board issue an order permanently
24 revoking the license with no possibility of reinstatement. **MOTION CARRIED**
25 **UNANIMOUSLY**

26
27 Michael Pyevich moved, with a second by Kathy Behrens, that in case number 25-183
28 the Board accept the agreement submitted by the parties, and issue an Order
29 incorporating the agreement and imposing the agreed upon sanction. **MOTION**
30 **CARRIED UNANIMOUSLY**

31
32 Kathy Behrens moved, with a second by Daniel Zylstra, that in case number 23-31 &
33 23-74 the Board accept the agreement submitted by the parties, and issue an Order

1 incorporating the agreement and imposing the agreed upon sanction. **MOTION**
2 **CARRIED UNANIMOUSLY**

3
4 Kathy Behrens moved, with a second by Pam Bleam, that in case number 24-244, the
5 Board accept the agreement submitted by the parties, and issue an Order
6 incorporating the agreement and imposing the agreed upon sanction. **MOTION**
7 **CARRIED UNANIMOUSLY**

8
9 Paige Thorson moved, with a second by Miranda Brus, that in case number 24-231,
10 the Board reject the agreement submitted by the parties, and return the cases for
11 further proceedings consistent with this decision. Roll call vote: Behrens – yes; Bleam
12 – yes; Brus - yes; Janzen – yes; St Clair – yes; Pyevich – no; Thorson – yes; Sammons –
13 yes; Zylstra – yes; **MOTION CARRIED**

14
15 Michael Pyevich moved, with a second by Daniel Zylstra, that in case number 24-106,
16 in the Matter of Samantha Kruse, the Board will adopt the factual findings of the
17 administrative law judge and the conclusions of law as modified subject to the parties
18 appeal rights. **MOTION CARRIED UNANIMOUSLY**

19
20 Daniel Zylstra moved, with a second by Miranda Brus, to extend the 180-day deadline
21 for issuance of the final decision in case number 25-142, based on additional
22 investigative information was requested by the Board to make a probable cause
23 determination, additional time is required to complete a comprehensive investigation
24 and conclude the contested case process. Respondent did not file an objection to the
25 extension even though given an opportunity to object and allowing more time for
26 resolution of the complaint assures due process for the respondent. **MOTION**

27 **CARRIED UNANIMOUSLY**

28
29 Michael Pyevich moved, with a second by Paige Thorson to extend the 180-day
30 deadline for issuance of the final decision in case number 25-143, based on the need
31 to schedule the hearing or negotiate settlement and conclude the contested case
32 process. Respondent did not file an objection to the extension even though given an
33 opportunity to object and justice would not be served by dismissing a pending

1 complaint concerning alleged ethical wrongdoing of an educator given the need to
2 maintain safe learning environments for Iowa students. **MOTION CARRIED**

3 **UNANIMOUSLY**

4

5 Kathy Behrens moved, with a second by Miranda Brus, to extend the 180-day deadline
6 for issuance of the final decision in **case number 25-149** based on the need to
7 schedule the hearing or negotiate settlement and conclude the contested case process.
8 Respondent does not object to the extension and retaining this pending licensing
9 matter reinforces the significance of due process for both the complainant and the
10 respondent within the licensing disciplinary system. **MOTION CARRIED**

11 **UNANIMOUSLY**

12

13 Daniel Zylstra moved, with a second by Jennifer Sammons, to extend the 180-day
14 deadline for issuance of the final decision in **case number 25-150** based on the need
15 to schedule the hearing or negotiate settlement and conclude the contested case
16 process. Respondent did not file an objection to the extension even though given an
17 opportunity to object and allowing more time for resolution of the complaint assures
18 due process for the respondent. **MOTION CARRIED UNANIMOUSLY**

19

20 Michael Pyevich moved, with a second by Kathy Behrens, to extend the 180-day
21 deadline for issuance of the final decision in **case number 25-151**, based on the need
22 to schedule the hearing or negotiate settlement and conclude the contested case
23 process. Respondent did not file an objection to the extension even though given an
24 opportunity to object and dismissal of the case would undermine public trust in
25 educational licenses and would result in disparate treatment of similar ethical
26 violations. **MOTION CARRIED UNANIMOUSLY**

27

28 Paige Thorson moved, with a second by Miranda Brus, to extend the 180-day deadline
29 for issuance of the final decision in **case number 25-152**, based on the need to
30 schedule the hearing or negotiate settlement and conclude the contested case process.
31 Respondent did not file an objection to the extension even though given an
32 opportunity to object and the Respondent would not be prejudiced by the additional

1 time necessary to resolve the pending complaint given that investigative information
2 remains confidential pending the final decision. **MOTION CARRIED UNANIMOUSLY**

3
4 Michael Pyevich moved, with a second by Paige Thorson, to approve the closed
5 session, in the matter of minutes for November 14, 2025. **MOTION CARRIED**
6 **UNANIMOUSLY**

7
8 Request for Reinstatement: **Case No. 23-176**, In the Matter of Spencer Stumpff. Mr.
9 Stumpff was charged with being on school premises while under the influence of
10 alcohol. He received a sanction of: a public reprimand, a 2-year suspension of his
11 license from October 6, 2023, with the ability to request that the suspension become
12 deferred after a minimum of 12 months. He was ordered to complete a substance
13 abuse evaluation and any recommended follow up treatment and complete a
14 comprehensive mental health evaluation. He also was ordered to take an Ethics
15 course. Mr. Stumpff has submitted a certificate of completion for the ethics class, a
16 substance abuse evaluation, and information about individual counseling. Mr.
17 Stumpff is requesting that the Board release him from suspension and reinstate his
18 license. Michael Pyevich moved, with a second by Kathy Behrens, that in case number
19 **23-176**, the Board grant the application for reinstatement as the reason for the
20 suspension no longer exists and reinstatement is in the public interest. I further move
21 that the Board authorize the Executive Director to sign the reinstatement order
22 consistent with the Board's discussion. Roll call vote: Behrens – yes; Bleam – yes;
23 Brus – yes; Janzen – no; St Clair – yes; Pyevich – yes; Thorson – yes; Sammons – yes;
24 Zylstra – yes; **MOTION CARRIED**

25
26 Communication from the Public:

27 None

28

29 Board Member Reports:

30 None

31

32 Executive Director's Report:

33 Legislative Report:

1 There is nothing to report at this time for 2026.

2

3 Agency Update:

4 BoEE staff celebrated the upcoming holidays on Wednesday Dec 17th. The BoEE is
5 working with other state licensing agencies to access SAVE to check legal presence on
6 all applicants. The BoEE office move to the Grimes Building is currently planned for
7 late January or early February.

8

9 Financial Report

10 Finances are currently about \$25,000 behind the same period last year; discussions
11 on next steps are ongoing.

12

13 License Report

14 Most applications are being processed in less than 2 weeks and some within 48 hours.
15 New Iowa Graduate applications are coming in gradually but most recommendations
16 will be in early January.

17

18 A reminder was provided regarding the completion of cybersecurity training and that it
19 is required of all state employees, including Board Members. The BoEE will be closed
20 December 24th and 25th for Christmas and January 1st for New Years.

21

22 Petition for Waiver:

23 None

24

25 Reports:

26 None

27

28 There being no further business, Paige Thorson moved, with a second by Kathy
29 Behrens, to adjourn the meeting at 11:34 a.m. **MOTION CARRIED UNANIMOUSLY.**

RECEIVED
EXECUTIVE DIRECTOR
BOARD OF EDUCATIONAL EXAMINERS
DEC 29 2025

IOWA BOARD OF EDUCATIONAL EXAMINERS

PETITION FOR WAIVER

Chapter 6 – Waivers or Variances from Administrative Rules

General Directions:

- Please print clearly or type on the form. The information is provided in this format to the Board of Educational Examiners for review. If the information is not legible, the petition will not be submitted to the Board.
- The petition must be complete. If any criterion is left blank, the petition for a waiver will not be submitted to the Board.
- Provide clear and convincing evidence for all sections of the petition for a waiver.

Section A. PETITIONER'S INFORMATION.

Name: Henry Ndifon Mbih

Case No. 26-01
(to be completed by Board)

Address:

Date: 12/24/2025

Folder Number (if known): 1134541

Home Phone with Area Code:

Work Phone with Area Code:

Section B. 282—6.4(17A) CRITERIA FOR WAIVER OR VARIANCE.

- **Denial of application.** In order for a petition for a waiver to be reviewed, the petitioner must have submitted an application to the Board of Educational Examiners and the determination has been provided to the petitioner that the petitioner is not eligible for the action to be completed based on a Board of Educational Examiners' rule. Please indicate when you submitted the application:
- **Waiver rule.** In response to a petition completed pursuant to rule 6.6(17A), 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:
 1. The application of the rule would impose an undue hardship on the person for whom the waiver is requested;

2. The waiver from the requirements of the rule in the specific case would not prejudice the substantial legal rights of any person;
3. The provisions of the rule subject to the petition for a waiver are not specifically mandated by statute or another provision of law; and
4. Substantially equal protection of public health, safety, and welfare will be afforded by a means other than prescribed in the particular rule for which the waiver is requested.

Section C. BOARD DISCRETION. 282—6.10(1)

- **Board's decision.** 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. Each petition for a waiver shall be evaluated by the board based on the unique, individual circumstances set out in the petition.
- **Appeal of Board's decision.** Once a decision is rendered by the Board, the decision is final. If you wish to contest the decision, you must do so in district court.

Section D. BURDEN OF PERSUASION. 282—6.10(2)

- **Be thorough.** Please complete the petition for a waiver in detail. This is the document that the Board will utilize in determining the outcome of your petition for a waiver. Do not assume that the Board will have any information that is not included in this waiver. If the information is not provided on the petition for a waiver, the information is not shared with the Board for its review.
- **Support.** You may attach additional pages to provide more documentation than what could be included in the spaces provided.
- **Burden of proof.** 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.
- **Board meeting agenda.** Please be aware that if you wish to attend the Board meeting at which your petition for a waiver is included on the agenda, you are welcome to speak at the public comment time on the agenda. You do not present the information to the Board regarding your petition during the agenda time set aside for your petition. That is the time that the Board will review the written information you have provided. If the Board asks you a question, you may respond.
- **New information.** If new information is provided at the Board meeting that was not included in the petition for a waiver, please be aware that the Board may table the discussion on your petition while reviewing the new information provided.

Section E. RULE INFORMATION

- Cite the specific rule or rules that you are requesting the Board to waive. You may find the rules on the Board of Educational Examiners' website: www.boee.iowa.gov

Click on the link for “Rules and Code” and scroll to the rule that you wish to waive.

Citation: *...in accordance with Iowa Administrative Code § 282—13.4(256) (ARC 8812C, IAB 1/22/25, effective 2/26/25), which states that a Master Educator License may be issued only upon completion of a master's degree...*

2. Provide a description of the rule or rules that you are requesting the Board to waive:
Description:

In accordance with Iowa Administrative Code § 282—13.4(256) (ARC 8812C, IAB 1/22/25, effective 2/26/25), a Master Educator License may be issued only upon completion of a master's degree. This rule exists to ensure that educators who hold an advanced license have completed graduate-level study that equips them with deeper pedagogical knowledge, leadership capacity, and a commitment to professional growth. I fully acknowledge and respect the intent of this regulation.

Section F. WAIVER INFORMATION

1. In your own words, provide a brief narrative of your specific request. Provide clear and convincing evidence.

I fully acknowledge and respect the Board's decision to adjust my previously issued Master Educator License to a Standard License due to the absence of a master's degree. My petition and this justification memo are submitted not in disagreement, but in professional good-faith to request an exception based on completion of substantial graduate-level coursework.

I respectfully request that the Board waives the requirement outlined in Iowa Administrative Code § 282—13.4(256) (ARC 8812C, IAB 1/22/25) that a Master Educator License may be issued only upon completion of a master's degree. While I acknowledge and fully respect the intent of this rule, I seek consideration based on my completion of substantial doctoral-level coursework within the Ph.D. program in Educational Leadership at Iowa State University and the university of Arizona, (please, see attached transcripts). The Ph.D. in Educational Leadership at Iowa State University is a terminal, research-intensive graduate program that does not confer a master's degree in education en route, however it exceeds the rigor, depth, and leadership preparation typically encompassed in a master's curriculum. My transcript reflects advanced coursework in educational leadership, organizational improvement, educational law, ethics, equity, and dissertation-based research.

2. In your own words, provide a brief narrative of the hardship that the Board's rule(s) would impose upon you (not the school district, not the area education agency, nor the local board of directors):

The current rule creates a significant personal hardship for me because it prevents my professional advancement, even though I have completed extensive doctoral-level coursework that exceeds the expectations of a master's degree. I have committed years of time, tuition, effort, and academic investment into a Ph.D. program with the intent of growing as an educator and leader in Iowa. However, without a waiver, I may be unable to access the licensure level that aligns with my qualifications, inhibits potential career pathways, and delays opportunities for leadership roles, professional recognition, and corresponding wage benefits that would support both my livelihood and continued academic progress.

3. To your knowledge, would any substantial legal rights be affected for other individuals by waiving this rule(s)? If the rule is waived, what would be the consequences? If this decision would become a precedent for others, what would be the ramifications?

To my knowledge, no substantial legal rights of others would be adversely affected by waiving this rule in my case. Granting this waiver would apply solely to my circumstances and would not prevent others from seeking or obtaining licensure under the existing requirements. If the rule is waived, the consequence would simply allow my doctoral coursework—at a level exceeding master's study—to satisfy the intent of advanced preparation envisioned by Iowa Administrative Code 282—13.4(256). Should this decision become a precedent, the likely ramifications would be that similarly qualified doctoral candidates who do not have access to a stand-alone master's degree within their program pathway could present individualized petitions for review, ensuring fairness without diminishing existing standards.

4. How would the equal protection of public health, safety and welfare be afforded if this waiver were granted? What are the benefits for your students if your waiver is granted? What are the benefits for other students? What are the benefits for the school district? How will you ensure that the welfare of your students will not be compromised if the waiver is granted? How will this decision protect the profession and the integrity of the licensure standards? How will this decision ensure the delivery of highly qualified content for enhanced student learning?

Granting this waiver would not compromise the protection of public health, safety, or welfare because it does not lower the expectations for professional knowledge or conduct—in fact, it recognizes preparation beyond the levels typically associated with a master's degree. As a current science teacher, my students would benefit from the advanced leadership, instructional strategies, and research-based practices I have gained through my doctoral coursework. These skills directly enhance classroom experiences, instructional quality, and student outcomes.

Other students across the district also benefit when educators with advanced leadership training are able to mentor students/colleagues, support curriculum development, and contribute to a positive learning environment. For the school district, this waiver allows trained educators to more fully engage in assignments that strengthen instructional capacity.

I will continue to uphold high ethical standards, state teaching requirements, and evidence-based instruction to ensure that student welfare remains important. This decision protects the integrity of the profession by acknowledging that doctoral-level preparation meets and exceeds the intent of advanced licensure. It supports the delivery of highly qualified, research-driven teaching and fosters stronger student learning.

5. What time are you requesting this waiver?

I am requesting this waiver in my entire teaching career/profession at the Iowa State

6. Does anyone else possess knowledge relevant to this waiver request? (If yes, list name, address and telephone number.) Your administrator/colleague/ other professional may submit a letter of support for your petition. Include the letter with the petition for a waiver.

No one has knowledge of this waiver request.

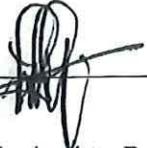
7. Please review the board waivers on the Board of Educational Examiners' website: www.boee.iowa.gov to determine if the board has reviewed a similar petition for a waiver and the outcome. Cite the similar petition(s) to support your request for a petition of a waiver of the rules.

Iowa Code Section 282—21.3(256) - Adding, removing or reinstating an endorsement. 21.3(1)
Adding an endorsement. To add an endorsement to an existing license, the applicant will follow one of these options:

Option 2. Apply for a review of transcripts, out-of-state licensure, or approved assessment score reports by the board of educational examiners' staff to determine whether Iowa requirements have been met. Applicants will have achieved a C- grade or higher in the courses that will be considered for an endorsement. The methods of course can be waived if the practitioner holds an endorsement in the same content area at a different level and teaches in the new content area successfully while holding a Class B license.

Section G. RELEASE OF INFORMATION: I authorize any persons with knowledge of the relevant or important facts relating to the requested waiver to release any information to the Iowa Board of Educational Examiners.

Section H. ACCURACY AND TRUTH: I certify that the information on this Petition for Waiver is true and complete to the best of my knowledge. I understand that any misrepresentation of facts may result in the denial of this Petition.


Petitioner's Signature

12/24/2025

Date

This Petition is to be submitted to: Board of Educational Examiners, 701 E. Court Ave., Suite A, Des Moines, IA 50319-0147.

Waiver form revised - Dec. 2011.doc.certifdrive

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EXECUTIVE DIRECTOR
BOARD OF EDUCATIONAL EXAMINERS
JAN 05 2026

IOWA BOARD OF EDUCATIONAL EXAMINERS

PETITION FOR WAIVER

Chapter 6 – Waivers or Variances from Administrative Rules

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- Provide clear and convincing evidence for all sections of the petition for a waiver.

Section A. PETITIONER'S INFORMATION.

Name: Robert J. Justice II

Case No. 26-02
(to be completed by Board)

Address:

Date: 12/16/2025

Folder Number (if known): 1148755

Home Phone with Area Code:

Work Phone with Area Code: (____) - _____ - _____

Section B. 282—6.4(17A) CRITERIA FOR WAIVER OR VARIANCE.

- Denial of application. In order for a petition for a waiver to be reviewed, the petitioner must have submitted an application to the Board of Educational Examiners and the determination has been provided to the petitioner that the petitioner is not eligible for the action to be completed based on a Board of Educational Examiners' rule. Please indicate when you submitted the application:

12/1/25 - I submitted my initial application for Content Specialist Authorization.

12/4/25 - I qualified for endorsements 1541 (5-12 basic science) and 152 (5-12 chemistry).

12/5/25 - I replied to the email for my Initial Content Specialist Authorization to petition for my initial authorization to also include 151 (biology), 153 (earth science), 156 (physics), and 185

(science - All) because I have the degrees and credit hours to support these in my submitted transcripts.

12/9/25 - I was notified of the option to apply for a waiver of the Administrative Rules.

- Waiver rule. In response to a petition completed pursuant to rule 6.6(17A), 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:
 1. The application of the rule would impose an undue hardship on the person for whom the waiver is requested;
 2. The waiver from the requirements of the rule in the specific case would not prejudice the substantial legal rights of any person;
 3. The provisions of the rule subject to the petition for a waiver are not specifically mandated by statute or another provision of law; and
 4. Substantially equal protection of public health, safety, and welfare will be afforded by a means other than prescribed in the particular rule for which the waiver is requested.

Section C. BOARD DISCRETION. 282—6.10(1)

- Board's decision. 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. Each petition for a waiver shall be evaluated by the board based on the unique, individual circumstances set out in the petition.
- Appeal of Board's decision. Once a decision is rendered by the Board, the decision is final. If you wish to contest the decision, you must do so in district court.

Section D. BURDEN OF PERSUASION. 282—6.10(2)

- Be thorough. Please complete the petition for a waiver in detail. This is the document that the Board will utilize in determining the outcome of your petition for a waiver. Do not assume that the Board will have any information that is not included on this waiver. If the information is not provided on the petition for a waiver, the information is not shared with the Board for its review.
- Support. You may attach additional pages to provide more documentation than what could be included in the spaces provided.
- Burden of proof. 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.
- Board meeting agenda. Please be aware that if you wish to attend the Board meeting at which your petition for a waiver is included on the agenda, you are welcome to speak at the public comment time on the agenda. You do not present the information to the Board regarding your petition during the agenda time set aside for your petition. That is the time that the Board will review the written information you have provided. If the Board asks you a question, you may respond.

- New information. If new information is provided at the Board meeting that was not included in the petition for a waiver, please be aware that the Board may table the discussion on your petition while reviewing the new information provided.

Section E. RULE INFORMATION

- Cite the specific rule or rules that you are requesting the Board to waive. You may find the rules on the Board of Educational Examiners' website: www.boee.iowa.gov
Click on the link for "Rules and Code" and scroll to the rule that you wish to waive.

Citation:

Although the "Rules and Code" link did not appear at the link above, I found this:

Iowa Code 282.22.15(272) Content Specialist Authorization:

<https://www.legis.iowa.gov/docs/iac/rule/282.22.15.pdf>

And the BOEE covers the rules for Content Specialist Authorization here:

<https://educate.iowa.gov/educator-licensure/licenses-authorizations/content-specialist-authorization>

2. Provide a description of the rule or rules that you are requesting the Board to waive:

Description:

"The applicant must have completed a master's degree or higher in an endorsement area through a college or university accredited by an institutional accrediting agency as recognized by the U.S. Department of Education."

I have completed multiple degrees, and with my degree programs, I believe I qualify for several additional endorsements, listed below.

Section F. WAIVER INFORMATION

1. In your own words, provide a brief narrative of your specific request. Provide clear and convincing evidence.

I have completed multiple degrees, and within my degree programs, I qualify for several endorsements, listed below. The rule seems to have a technicality in the language that assumes there would only ever be one endorsement area to be found in an individual's completed degree program(s). However, this seems to be a technicality within the language that may not have been intended (it could just as easily say "The applicant must have completed a master's degree or higher in endorsement areas through a college or university accredited..." and may not recognize the immensity and diversity of individual's coursework taken through multiple degree programs—BS, MS, and PhD). When multiple degrees are present, I wonder whether that interpretation was intended to be limited to only one degree program, or whether it might be interpreted as all endorsements you qualify for when considering the depth and breadth of the coursework required in completing your degree program(s).

I am requesting that the BOEE recognize the qualifications I already hold in multiple endorsement areas that I have demonstrated within my degree program transcripts that were submitted with my initial application for the Content Specialist Authorization. My reasons for this request are: 1) I have content area expertise in multiple science areas noted in my degree programs; 2) I am location-bound and I wish to serve in the educational community in Iowa in the area where I live; 3) This will help rural schools who are served by

this rule because they may struggle to find a qualified teacher even after a diligent search, and these rural schools with low student enrollments are likely to need to hire one science teacher who is qualified to teach all areas of science (this is important in districts that do not have enough student enrollment to hire multiple science teachers); and 4) This will advantage high school students in rural schools who will benefit from Iowa's programs of joint enrollment, PSEO, and concurrent enrollment, so that rural students have opportunities similar to students in more urban areas. I will outline my qualifications for item 1 under this question, and I will respond to the questions below regarding my items 2-4.

1) I have content area expertise in multiple science areas noted in my degree programs.

My B.S. and my PhD are both in the area of chemistry. So I have already been awarded endorsement 152 chemistry. No issue.

a. My first request is to be awarded the endorsement 156 Physics on my initial authorization. I actually started my B.S. as a physics major, but the university removed the program later due to faculty shortage. As such, I have enough physics credits for a Minor. I have 16 hours in Physics. This is over the 15 hours normally required for the Iowa Endorsement 156 Physics. Here is the BOEE requirement and my courses and credit hours from my transcripts (attached separately):

BOEE Endorsement 156: 5-12 Physics.

Completion of 24 semester hours in physics or 30 semester hours in the broad area of science to include **15 semester hours in physics**.

For holders of the mathematics 5-12 endorsement, completion of:

12 credits of physics to include coursework in mechanics, electricity, and magnetism; and

A methods class that includes inquiry-based instruction, resource management, and laboratory safety.

For holders of the chemistry 5-12 endorsement, completion of 12 credits of physics to include coursework in mechanics, electricity, and magnetism.

I have these courses in my B.S. degree:

PHYS 170 Elements of Photography (optics, light, etc.)	3 hrs
PHYS 100 Intro Astronomy (space science, etc.)	3 hrs
PHYS 201 General Physics (mechanics, electricity, etc.)	4 hrs
PHYS 202 General Physics II (magnetism, force, etc.)	4 hrs
PHYS 204 Physical Measurement (Lab)	1 hr
PHYS 203 Physics Laboratory I	1 hr
Total = 16 hours	

b. My second request is to be awarded the endorsement 151 Biology on my initial authorization. At question here is whether or not courses in Biochemistry would count toward this endorsement. If they would count, then I more than qualify for this endorsement as well. I can assure you that in all of the biochemistry courses I have taken, there was extraordinary focus placed on biological systems. Biochemistry is the study of the chemical substances and vital processes occurring in live organisms. Biochemists focus heavily on the role, function, and structure of biomolecules. The study of the chemistry behind biological processes and the synthesis of biologically active molecules are applications of biochemistry. Here is the BOEE requirement and my courses and credit hours from my transcripts (attached separately):

BOEE Endorsement 151: 5-12 Biology.

Completion of 24 semester hours in biology coursework or 30 semester hours in the broad area of science to include **15 semester hours in biology**.

I have these courses in my B.S. and PhD programs:

BIOL 101 Principles of Biology	4 hrs
CHEM 331 Intro Biochemistry	3 hrs
CHEM 333 Biochemistry Lab	2 hrs
CHEM 554 Biochemistry II	3 hrs
CHEM 550 Biochemistry I	3 hrs
	Total = 15 hours

c. My third request is to be awarded the endorsement 153 Earth Science on my initial authorization.

Here is the BOEE requirement and my qualification from my transcripts (attached separately):

BOEE Endorsement 153: 5-12 Earth Science.

Completion of 24 semester hours in earth science coursework or 30 semester hours in the broad area of science to include **15 semester hours in earth science.**

I have:

an M.S. in Environmental Studies (a 36-credit hour program)

d. My fourth request is to be awarded the endorsement 185 5-12 Science - All.

Here is the BOEE requirement and my qualification from my transcripts (attached separately).

BOEE Endorsement 185 – 5-12 Science – All.

Completion of 36 semester hours in science to include:

9 semester hours in earth and space science

9 semester hours in life science/biological science

9 semester hours in physics/physical science

9 semester hours in chemistry

I have:

I have a B.S and PhD in chemistry. I have an M.S. in Environmental Studies, which includes coursework in earth science. I have 16 hours (enough for a minor in many colleges) in Physics and I listed this coursework above. 15 hours in Biology (enough for a minor in many colleges) and I listed this coursework above.

2. In your own words, provide a brief narrative of the hardship that the Board's rule(s) would impose upon you (not the school district, not the area education agency, nor the local board of directors):

I am location-bound in Cedar Falls, IA. I am a mature, professional scientist, educator, and mentor with a wealth of academic and practical experience that I accumulated over my career. Beyond the jobs that I have held as a full-time employee, I have sought out adjunct teaching positions at community colleges and four year institutions. In these adjunct roles, I served the needs of students with patience, expertise, and distinction. Now that I have adopted Iowa as my new home, I want to share my substantial body of knowledge within the Iowa educational system. The hardship for me would be that I am in possession of a lifetime of formal education and a career of practical teaching experiences that these rules, as currently constituted, literally invalidate—and the students of Iowa would not be able to benefit from my considerable and expansive knowledge of the varied areas of science that I am experienced in. I fulfill or exceed the requirements placed on Education majors that would result in them getting the endorsements I now seek. Further, I have valid teaching experiences, both as a corporate trainer and in post-secondary schools. I believe that as a result of having successful assignments in community colleges and four year institutions, I

am prepared to serve the secondary school students in Iowa as a teacher of biology, physics, earth science, and chemistry.

3. To your knowledge, would any substantial legal rights be affected for other individuals by waiving this rule(s)? If the rule is waived, what would be the consequences? If this decision would become a precedent for others, what would be the ramifications?

I am not aware of any substantial legal rights to be affected for others by waiving the rule(s) that I am requesting, nor am I aware of any possible ramifications from granting me the additional endorsements that I am seeking because I sincerely believe that I am qualified to teach these additional areas as a result of academic coursework.

4. How would the equal protection of public health, safety and welfare be afforded if this waiver were granted? What are the benefits for your students if your waiver is granted? What are the benefits for other students? What are the benefits for the school district? How will you ensure that the welfare of your students will not be compromised if the waiver is granted? How will this decision protect the profession and the integrity of the licensure standards? How will this decision ensure the delivery of highly qualified content for enhanced student learning?

Granting this waiver will help rural schools who are served by this rule, especially those that may struggle to find a qualified science teacher, even after a diligent search. It is also likely that these rural schools with low student enrollments need to hire one science teacher who is qualified to teach all areas of science (this is important in districts that do not have enough student enrollment to hire multiple science teachers).

Allowing me to teach more than one area of high school science will greatly help a rural district, for reasons stated previously. In fact, it appears this is exactly the scenario that this rule was designed to address.

This will advantage high school students in rural schools who will benefit from Iowa's programs of joint enrollment, PSEO, and concurrent enrollment, so that rural students have opportunities similar to students in more urban areas. This will advantage students if I have all of the endorsements tied to my degrees and coursework so that a small school would be able to not only use my background to meet their needs in having me teach all science subjects, but it would also provide students opportunities to get important PSEO classes to help them meet college requirements. This will save the students money and time on their college programs, as intended in the Iowa code regarding joint enrollment.

5. What time period are you requesting for this waiver?

Ideally, it would be helpful for me to have this decision by late- January 2026, as I have already interviewed with, and been offered employment with, at least two school districts.

6. Does anyone else possess knowledge relevant to this waiver request? (If yes, list name, address and telephone number.) Your administrator/colleague/ other professional may submit a letter of support for your petition. Include the letter with the petition for a waiver. -Not at this time.

7. Please review the board waivers on the Board of Educational Examiners' website: www.boee.iowa.gov to determine if the board has reviewed a similar petition for a waiver and the outcome. Cite the similar petition(s) to support your request for a petition of a waiver of the rules.

Although the "Rules and Code" link did not appear at the link above, I found this website, but I did not see any waivers similar to the one that I am asking the Board to consider...
<https://educate.iowa.gov/pk-12/accreditation-program-approval/waiver-exemption-application>

Section G. RELEASE OF INFORMATION: I authorize any persons with knowledge of the relevant or important facts relating to the requested waiver to release any information to the Iowa Board of Educational Examiners.

Section H. ACCURACY AND TRUTH: I certify that the information on this Petition for Waiver is true and complete to the best of my knowledge. I understand that any misrepresentation of facts may result in the denial of this Petition.

Robert J. Justice II, PhD

Petitioner's Signature

03Jan2026

Date

This Petition is to be submitted to: Board of Educational Examiners, 701 E. Court Ave., Suite A, Des Moines, IA 50319-0147.

Waiver form revised - Dec. 2011.doc.certifdrive

IOWA BOARD OF EDUCATIONAL EXAMINERS

PETITION FOR WAIVER

Chapter 6 – Waivers or Variances from Administrative Rules

General Directions:

- Please print clearly or type on the form. The information is provided in this format to the Board of Educational Examiners for review. If the information is not legible, the petition will not be submitted to the Board.
- The petition must be complete. If any criterion is left blank, the petition for a waiver will not be submitted to the Board.
- Provide clear and convincing evidence for all sections of the petition for a waiver.

Section A. PETITIONER'S INFORMATION.

Name: Patrick Johnston

Case No. 26-03
(to be completed by Board)

Address:

Date: 01/06/2026

Folder Number (if known): 1145266

Home Phone with Area Code:

Work Phone with Area Code:

Section B. 282—6.4(17A) CRITERIA FOR WAIVER OR VARIANCE.

- Denial of application. In order for a petition for a waiver to be reviewed, the petitioner must have submitted an application to the Board of Educational Examiners and the determination has been provided to the petitioner that the petitioner is not eligible for the action to be completed based on a Board of Educational Examiners' rule. Please indicate when you submitted the application:

My original application for the Content Specialist Authorization was submitted in June 2025. On June 16, 2025, I received an email from the BoEE confirming that I met the requirements for the 5–12 Biology authorization.

In December 2025, I interviewed for a High School Science Teacher position in the Clarksville Community School District. I was strongly supported by the principal, who contacted the BoEE on

my behalf to advocate for my qualifications. Despite being highly qualified for the position, the district ultimately hired another applicant because my authorization was limited to Biology. My broader academic and professional background—including extensive work in academia, interdisciplinary research, and a strong CV—could not be fully considered due to this restriction. This experience demonstrated that the limitation to Biology significantly hinders my ability to obtain employment in rural Iowa, where districts typically require teachers who can cover multiple science disciplines. I respectfully request that the BoEE review my career and education as a whole and consider adding the Science or Basic Science authorization to my existing Biology endorsement. Expanding my authorization would allow me to meet the needs of schools seeking teachers who can teach more than one science subject and would remove a barrier that is preventing me from securing employment aligned with my expertise.

- Waiver rule. In response to a petition completed pursuant to rule 6.6(17A), 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:
 1. The application of the rule would impose an undue hardship on the person for whom the waiver is requested;
 2. The waiver from the requirements of the rule in the specific case would not prejudice the substantial legal rights of any person;
 3. The provisions of the rule subject to the petition for a waiver are not specifically mandated by statute or another provision of law; and
 4. Substantially equal protection of public health, safety, and welfare will be afforded by a means other than prescribed in the particular rule for which the waiver is requested.

Section C. BOARD DISCRETION. 282—6.10(1)

- Board's decision. 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. Each petition for a waiver shall be evaluated by the board based on the unique, individual circumstances set out in the petition.
- Appeal of Board's decision. Once a decision is rendered by the Board, the decision is final. If you wish to contest the decision, you must do so in district court.

Section D. BURDEN OF PERSUASION. 282—6.10(2)

- Be thorough. Please complete the petition for a waiver in detail. This is the document that the Board will utilize in determining the outcome of your petition for a waiver. Do not assume that the Board will have any information that is not included on this waiver. If the information is not provided on the petition for a waiver, the information is not shared with the Board for its review.
- Support. You may attach additional pages to provide more documentation than what could be included in the spaces provided.

- Burden of proof. 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.
- Board meeting agenda. Please be aware that if you wish to attend the Board meeting at which your petition for a waiver is included on the agenda, you are welcome to speak at the public comment time on the agenda. You do not present the information to the Board regarding your petition during the agenda time set aside for your petition. That is the time that the Board will review the written information you have provided. If the Board asks you a question, you may respond.
- New information. If new information is provided at the Board meeting that was not included in the petition for a waiver, please be aware that the Board may table the discussion on your petition while reviewing the new information provided.

Section E. RULE INFORMATION

- Cite the specific rule or rules that you are requesting the Board to waive. You may find the rules on the Board of Educational Examiners' website: www.boee.iowa.gov
Click on the link for "Rules and Code" and scroll to the rule that you wish to waive.

Citation:

1. Iowa Administrative Code 282—21.3(1): Adding an Endorsement

This rule requires applicants to meet either:

- Option 1: An Iowa institution's recommendation that all program requirements are met, or
- Option 2: Completion of the state minimum requirements for the endorsement (transcript review).

This is the rule that prevents the BoEE from granting you the 5–12 Science – Basic endorsement unless you meet the exact distribution of coursework (6 credits in each discipline).

I am requesting a waiver of this rule so that my advanced graduate-level science coursework can be accepted as equivalent preparation.

Source: The rule appears on the Science – Basic endorsement worksheet and Iowa Administrative Code listing for BoEE rules.

2. Iowa Administrative Code 282—21.3(1)(a–b): State Minimum Requirements for Endorsements

This is the specific part of the rule that enforces the credit-distribution requirement (6 credits each in biology, chemistry, physics/physical science, and earth/space science).

I am requesting a waiver of this requirement because my doctoral-level science coursework spans multiple disciplines and meets or exceeds the intent of the rule.

Source: Science – Basic endorsement worksheet, endorsement analysis documents and the rule appears on Iowa Administrative Code listing for BoEE rules.

3. Iowa Administrative Code 282—Chapter 6: Waivers From Administrative Rules (282-6.1)

This is the chapter that authorizes the Board to grant waivers when strict application of a rule creates hardship and when the waiver is consistent with public interest.

Source: Iowa Administrative Code listing for BoEE rules.

2. Provide a description of the rule or rules that you are requesting the Board to waive:
Description:

I am requesting a waiver of Iowa Administrative Code rule 282—21.3(1), including the state minimum requirements for adding the 5–12 Science – Basic endorsement. This rule requires completion of specific semester-hour distributions across biology, chemistry, physics/physical science, and earth/space science. I am requesting that the Board waive this requirement and accept my graduate-level interdisciplinary science coursework as meeting the intent of the endorsement requirements. This waiver request is submitted pursuant to the Board’s authority under Iowa Administrative Code Chapter 6 (Waivers from Administrative Rules).

Section F. WAIVER INFORMATION

1. In your own words, provide a brief narrative of your specific request. Provide clear and convincing evidence.

I am writing to respectfully request an additional endorsement—Science or Basic Science—to be added to my current Content Specialist Authorization in 5–12 Biology. Expanding this authorization is essential for me to obtain a science teaching position in rural North Eastern Iowa, where districts urgently need qualified STEM educators who can teach across multiple scientific disciplines.

Although I have applied for several positions, my current authorization limited solely to Biology has prevented me from being considered for roles that require multi-disciplinary science instruction. Most rural districts need teachers who can cover a range of science courses, and my current authorization does not reflect the breadth of my academic preparation or professional experience.

I have spent many years working in academia at the university level, and my professional practice demonstrates deep expertise in both foundational and advanced sciences. This includes earning a U.S. patent, completing a Ph.D. in Biorenewable Resources and Technology within the Department of Mechanical Engineering at Iowa State University, and authoring numerous peer-reviewed research publications. I also hold an undergraduate degree Biology with a minor in Chemistry from the University of Northern Iowa. My coursework and research span biology, chemistry, physics/physical science, and earth/space science.

I appreciate the rigor with which the Iowa Board of Educational Examiners evaluates teacher credentials, and I respectfully ask that you consider my full academic and professional background—nearly three decades in scientific research, teaching, and applied STEM fields. Granting this endorsement would allow me to serve Iowa students more broadly in science classrooms, particularly in districts facing persistent shortages of qualified science teachers.

2. In your own words, provide a brief narrative of the hardship that the Board’s rule(s) would impose upon you (not the school district, not the area education agency, nor the local board of directors):

The current rule limiting my Content Specialist Authorization to Biology imposes a significant hardship on my ability to obtain full-time employment as a science teacher. Rural Iowa districts typically require teachers who can cover multiple science disciplines, and my restricted authorization has already prevented me from being considered for several positions for which I am otherwise academically and professionally qualified. Despite holding a Ph.D. in Biorenewable Resources and Technology, a U.S. patent, extensive university-level research experience, and a strong academic foundation across biology, chemistry, physics/physical science, and earth/space science, I am unable to access the full range of science teaching

opportunities in my region. This limitation directly affects my livelihood, my ability to support my family, and my ability to contribute to Iowa schools in a high-need STEM area.

The hardship is not on the districts—it is on me personally. Without the ability to teach across the broader science curriculum, I am effectively barred from most available science positions in rural communities, despite having the preparation and experience to serve students well. Granting the Basic Science endorsement would remove this barrier and allow me to pursue sustainable employment aligned with my expertise.

3. To your knowledge, would any substantial legal rights be affected for other individuals by waiving this rule(s)? If the rule is waived, what would be the consequences? If this decision would become a precedent for others, what would be the ramifications?

To my knowledge, waiving this rule would not affect any substantial legal rights of other individuals. Granting a waiver in my case would not remove or diminish anyone else's ability to obtain licensure, pursue endorsements, or seek employment. It would simply allow my existing academic preparation and professional experience to be recognized more fully.

If the rule were waived, the primary consequence would be that I could be considered for science teaching positions that require multi-disciplinary preparation—positions for which I am academically qualified but currently ineligible due to the narrow scope of my authorization. No other individual's rights, opportunities, or standing would be negatively impacted.

If this decision were to serve as a precedent, the likely ramification would be that other applicants with comparable advanced degrees, cross-disciplinary coursework, and substantial professional experience could also request review. This would not undermine the licensure system; rather, it would provide a structured pathway for the Board to consider exceptional cases where an applicant's preparation clearly aligns with broader endorsement requirements, even if it does not fit neatly within existing rule language.

4. How would the equal protection of public health, safety and welfare be afforded if this waiver were granted? What are the benefits for your students if your waiver is granted? What are the benefits for other students? What are the benefits for the school district? How will you ensure that the welfare of your students will not be compromised if the waiver is granted? How will this decision protect the profession and the integrity of the licensure standards? How will this decision ensure the delivery of highly qualified content for enhanced student learning?

Granting this waiver would continue to protect the public health, safety, and welfare because it would place a highly qualified science professional—someone with extensive academic preparation, research experience, and university-level teaching—into classrooms that urgently need certified STEM educators. The waiver does not reduce safety or lower standards; instead, it allows my full scientific preparation to be recognized so I can serve students in high-need rural districts.

Benefits for my students:

Students would gain access to a teacher with deep, cross-disciplinary expertise in biology, chemistry, physics/physical science, and earth/space science. My background as a Ph.D. scientist, researcher, and educator allows me to provide accurate, rigorous, and engaging instruction across the science curriculum. This breadth strengthens student learning, supports STEM readiness, and ensures that students receive high-quality content aligned with Iowa's academic standards.

Benefits for other students:

In rural districts, science teachers often serve multiple grade levels and disciplines. By expanding my authorization, more students across the district—not just those enrolled in biology—would have access to a qualified instructor. This helps ensure continuity of instruction, reduces staffing gaps, and supports equitable access to STEM education for all students.

Benefits for the school district:

Districts facing persistent shortages in science education would gain a versatile, fully prepared educator who can teach multiple science subjects without compromising instructional quality. This flexibility helps districts maintain stable staffing, meet accreditation requirements, and avoid emergency staffing measures that may place less-prepared individuals in classrooms.

Ensuring student welfare is not compromised:

My nearly three decades of scientific work, university teaching, and research demonstrate a long-standing commitment to accuracy, safety, and ethical practice. I will continue to uphold all professional standards, follow district policies, and deliver instruction grounded in evidence-based science. My preparation across multiple disciplines ensures that students receive instruction that is both safe and academically sound.

Protecting the profession and licensure integrity:

This waiver does not bypass standards; it recognizes that my academic preparation and professional experience already meet or exceed the competencies required for the Basic Science endorsement. Granting the waiver affirms the Board's ability to evaluate exceptional cases where an applicant's qualifications clearly align with endorsement expectations, even if they do not fit neatly within the rule structure. This strengthens—not weakens—the integrity of the licensure system.

Ensuring delivery of highly qualified content:

My advanced degrees, U.S. patent, peer-reviewed publications, and interdisciplinary scientific training demonstrate that I am well-prepared to deliver high-quality, accurate, and rigorous science instruction. Students will benefit from a teacher who brings real-world scientific experience, strong content knowledge, and a commitment to helping rural Iowa students succeed in STEM fields.

5. What time period are you requesting for this waiver?

I am requesting the waiver for a period of one year, aligned with the upcoming school year, with the understanding that I may reapply if additional time or documentation is required.

6. Does anyone else possess knowledge relevant to this waiver request? (If yes, list name, address and telephone number.) Your administrator/colleague/ other professional may submit a letter of support for your petition. Include the letter with the petition for a waiver.

Not at this time, but I have included letters of recommendation from two former colleagues at Iowa State University that supported my application for the High School Science Teacher position with the Clarksville Community School District.

7. Please review the board waivers on the Board of Educational Examiners' website: www.boee.iowa.gov to determine if the board has reviewed a similar petition for a waiver and the outcome. Cite the similar petition(s) to support your request for a petition of a waiver of the rules.

I reviewed the Board of Educational Examiners' public waiver database, available through the Board Order Search system on the BoEE website. The database includes all waivers that are a matter of public record. Based on this review, I did not find any prior waivers specifically related to the 5–12 Science – Basic endorsement or to waiving the credit-distribution requirements under rule 282—21.3(1).

However, the Board has granted waivers in other licensure contexts when applicants demonstrated that strict application of a rule created a personal hardship and when the applicant's preparation met the intent of the rule. These waivers show that the Board has precedent for granting relief when an applicant's qualifications exceed the spirit and purpose of the requirement, even if they do not align with the exact credit or coursework structure outlined in rule.

The existence of these waivers demonstrates that the Board has previously exercised its authority under Iowa Administrative Code Chapter 6 to grant individualized relief when doing so serves the public interest and does not compromise licensure standards. My request aligns with this precedent: I am seeking recognition of advanced, interdisciplinary graduate-level science preparation that meets or exceeds the intent of the Basic Science endorsement requirements, and I am experiencing a clear hardship due to the rule's strict credit-distribution structure.

Citations:

1. Iowa Board of Educational Examiners – Board Order Search (Waivers Database)
<https://educate.iowa.gov/educator-licensure/ethics-complaints/board-order-search>
2. Iowa Public Professional Data (PPD) Search Portal
<https://www.iowaonline.state.ia.us/ppd/>

Section G. RELEASE OF INFORMATION: I authorize any persons with knowledge of the relevant or important facts relating to the requested waiver to release any information to the Iowa Board of Educational Examiners.

Section H. ACCURACY AND TRUTH: I certify that the information on this Petition for Waiver is true and complete to the best of my knowledge. I understand that any misrepresentation of facts may result in the denial of this Petition.



Petitioner's Signature

01/06/2026

Date

This Petition is to be submitted to: Board of Educational Examiners, 701 E. Court Ave., Suite A, Des Moines, IA 50319-0147.

Waiver form revised - Dec. 2011.doc.certifdrive



Legislative Report

2025 Board of Educational Examiners Fees



State of Iowa
Department of Education
Grimes State Office Building
400 E. 14th Street
Des Moines, IA 50319-0146

Administration

McKenzie Snow, Director and Executive Officer
of the State Board of Education

Board of Educational Examiners

Chad Janzen, Chair, Sergeant Bluff-Luton CSD, Superintendent
Kathy Behrens, Vice Chair, Carroll Kuemper Catholic Schools, Teacher
Pam Bleam, Manson Northwest Webster CSD, Elementary Counselor
Miranda Brus, Des Moines, Counselor
Davis Eidahl, Solon CSD, Superintendent
Dr. Michael Pyevich, Bettendorf, Past School Board Member
Eric St. Clair, Iowa Department of Education
Jennifer Sammons, Storm Lake, Administrator
Paige Thorson, Norwalk, Parent
Daniel Zylstra, Pella, Pella Christian

Mike Cavin, Executive Director

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Budget Assumptions and Findings

This report provides an overview of the Board of Educational Examiners' budget, expenses and findings.

1. The Bureau of Educational Examiners (BOEE) is a unit within the Iowa Department of Education (Department). The BOEE employs 17 FTEs. The 13- member Board of Educational Examiners (board) is appointed by the Governor, with the exception of the Director of the Department of Education or the Director's designee.
2. In the past three years, case and investigation volume has more than doubled. In 2021-22, the Board considered 142 cases; in 2024-25, the Board considered 297 cases. This represents an increase of 109 percent from 2021-22 to 2024-25, and an increase of 36 percent from 2023-24 to 2024-25.
 - a. The addition of two investigators funded through an appropriation from the General Assembly was effective at resolving the backlog of submitted complaints and ensuring a timely investigation of new complaints submitted to the BOEE.
 - b. In 2024-25, the average time from receipt of complaint to Board hearing was 137.7 days. To date, in 2024-25, the average time from receipt of complaint to Board hearing is 99.6 days. This represents a 38-day reduction in the time to complete an investigation which is approximately equal to the average time of investigation in 2022-23, while on pace to investigate 100 more cases in 2024-25 than were investigated in 2022-23.
3. Costs related to investigations and the prosecution of complaints total approximately \$700,000 for staff and services, including payments to the Iowa Attorney General's office.
4. Licensure fees are the primary revenue source for the BOEE. Since 2006, licensing fees for educators have not increased. The Department receives an appropriation from the Iowa Legislature for two investigators – all other revenue is derived from licensing fees. Since 2004, the BOEE is statutorily required to transfer 25 percent of licensure fees to the state General Fund. This amounts to an annual transfer of approximately \$600,000 and contributes to a yearly budget deficit.
5. The 2023 Iowa Acts, HF 672 requires a new licensure renewal option for educators with an advanced degree and 10 years or more experience. This results in an approximately \$116,000 reduction in revenues per year (the equivalent of one FTE position), and a corresponding decrease of approximately \$37,000 to the General Fund.
6. The BOEE is required to check the sex offender registry, child abuse registry, the dependent adult abuse registry when renewing a license, and, since FY2016, Iowa Courts Online records for all renewal applications. The BOEE collects a \$10 background check fee to offset the associated cost. This fee was last increased in FY17.
7. Since 2009, the Legislature has made three transfers from BOEE cash reserves to fund external initiatives:
 - a. In FY09, \$300,000 was transferred to the Iowa Department of Education (Department) to pay for Early Head Start projects involving children aged birth to 3. Additionally, \$454,000 was transferred to the Department to pay for the beginning teacher mentoring and induction program, for a total of \$754,000. The general fund deposit for FY09 was \$580,139, creating a combined expenditure of \$1,334,139.

- b. In FY15, \$600,000 was transferred to the Department for purposes of continuing the career planning required under Iowa Code section 279.61. The appropriated funds paid for one year of the I Have a Plan Iowa career planning software. The general fund deposit for FY15 was \$587,182, creating a combined expenditure of \$1,187,182.
- 8. The BOEE must maintain a cash carryover to cover costs. A minimum balance of \$600,000 would cover three months of average expenditures, excluding general fund deposit expenditures, should a catastrophic reduction in license applications occur.
- 9. Where possible, the BOEE utilizes technology for the effective and efficient delivery of services, such as the online licensing system which requires approximately \$175,000 to operate annually. The current licensure system is maintained through a state contract managed through the Office of the Chief Information Officer, better aligning our services and licensing needs. Continued revisions and updates will be required to maintain the effectiveness and simplify the use for our customers.

Budget Forecast

The list below includes the Board's FY25 budget and projections through FY28. The funds are held by the Department (282), in Fund 0001, Unit 9397, Appropriation I54. Tables 1 and 2 provide detailed revenue and expenditure projections.

Table 1: Projected Revenue Collected by Fiscal Year

Code and Type	FY25	FY26	FY27	FY28
501 Refunds and Reimbursements	0	0	0	
234 Gov. Transfer in Other Agencies	99	500	500	500
401 Fees, Licenses and Permits	1,756,423	1,700,000	1,700,000	1,700,000
704 Other	568,877	590,000	590,000	590,000
State Funding	148,925	240,000	240,000	240,000
Total Revenues	2,474,324	2,530,000	2,530,000	2,530,000

- Does not include carryover from previous year.

Table 2: Projected Expenditures by Fiscal Year

Code and Type	FY25	FY26	FY27	FY28
101 Personal Services	2,098,802	2,214,236	2,336,016	2,646,500
202 In-State Travel	15,350	15,000	15,000	15,000
205 Out-of-State Travel	1,526	20,000	20,000	20,000
301 Office Supplies	2,479	10,000	10,000	10,000
302 Facility Maintenance Supplies	0	0	0	
308 Other Supplies	0	0	0	
309 Printing and Binding	495	3,500	3,500	3,500
311 Food	0	0	0	
313 Postage	4,862	8,000	8,000	8,000
401 Communications	19,655	15,000	15,000	15,000
402 Rentals	63,000	72,000	24,167	0
403 Utilities	2,719	4,000	1,000	0
405 Professional and Scientific Services	2,668	5,000	5,000	5,000
406 Outside Services	5,304	5,000	5,000	5,000
408 Advertising and Publicity	0	200	200	200
409 Outside Repairs/Service	437	1,000	1,000	1,000
414 Reimbursements to Other Agency	10,416	10,000	10,000	10,000

Code and Type	FY25	FY26	FY27	FY28
416 ITD Reimbursements	209,561	266,000	267,800	275,834
418 IT Outside Services	0	70,000	25,000	25,000
432 Attorney General Reimbursement	62,298	55,000	60,000	60,000
434 Gov. Transfer Other Agencies	476,760	324,259	398,397	432,055
501 Equipment	0	0	0	
502 Office Equipment	0	0	0	
503 Equipment: Non-Inventory	0	0	0	
510 IT Equipment and Software	21,495	5,000	5,000	5,000
602 Other Expenses and Obligations	40,569	30,000	30,000	30,000
702 Fees	0	0	0	
705 Refunds: Other	2,300	5,000	5,000	5,000
Total Expenditures	2,949,475	3,138,195	3,223,580	3,572,089
91B Balance Carry Forward	1,029,000	420,729	(272,851)	(1,314,940)

Previous Revenues and Expenditure

The balance carryforward from the past 10 fiscal years is listed below. Table 3 details receipts from FY15-25 and Table 4 includes revenues, expenditures and the carryforward balance to the following year. The fluctuation in revenues less expenditures highlights the importance of maintaining a cash balance beyond the minimum of \$600,000 to allow time for corrective action and prevent the need to increase fees.

Table 3: Receipts by Fiscal Year

Type	FY25	FY24	FY23	FY22	FY21	FY20	FY19	FY18	FY17	FY16	FY15
State Funding*	\$148,925										
Gov. Transfer in Other Agencies	\$99	\$314	\$20,755	\$2,300	\$6,744	\$8,927	\$6,196	(\$70)	\$321	\$600	\$338
Fees, Licenses and Permits	\$1,756,423	\$1,722,847	\$1,995,997	\$1,882,802	\$1,871,362	\$1,687,670	\$2,506,034	\$2,640,601	\$2,402,398	\$2,366,770	\$2,362,441
Other	\$568,877	\$586,619	\$694,520	\$641,369	\$669,828	\$505,984	\$586,567	\$620,625	\$454,700	\$448,835	\$363,491
Total Receipts	\$2,474,324	\$2,309,708	\$2,668,272	\$2,526,471	\$2,547,934	\$2,202,581	\$3,098,979	\$3,261,156	\$2,857,419	\$2,816,205	\$2,726,270
Less: General Fund Receipts	(\$552,873)	(\$542,574)	(\$634,580)	(\$598,198)	(\$594,734)	(\$536,090)	(\$603,924)	(\$638,663)	(\$587,499)	(\$582,569)	(\$587,182)

*Appropriation of two staff lines began FY26.

Table 4: Revenues, Expenditures and Balance Carry Forward by Fiscal Year

Type	FY25	FY24	FY23	FY22	FY21	FY20	FY19	FY18	FY17	FY16	FY15
Revenues	\$2,474,324	\$2,303,722	\$2,711,272	\$2,526,471	\$2,547,934	\$2,202,581	\$2,494,873	\$2,622,493	\$2,269,920	\$2,233,636	\$2,139,088
Expenditures	\$2,949,475	\$2,496,287	\$2,449,321	\$2,333,565	\$2,188,343	\$2,135,095	\$2,716,824	\$2,421,195	\$2,026,891	\$2,211,113	\$2,744,603
Revenues Less Expenditures	(\$475,151)	(\$192,565)	\$261,951	\$192,906	\$359,591	\$66,676	(\$221,251)	\$201,298	\$234,029	\$22,523	(\$605,515)
Balance Carried Forward to Next Year	\$1,029,000	\$1,504,152	\$1,696,717	\$1,434,766	\$1,241,860	\$882,269	\$815,593	\$1,037,544	\$836,246	\$593,217	\$570,694

Licenses Issued

Tables 5 and 6 offer a detailed breakdown of licenses issued by the BOEE. Table 5 shows the number of licenses issued by month during each of the past 10 fiscal years, while Table 6 includes the total number of each type of license issued during that timeframe.

Table 5: Licenses Issued by Fiscal Year and Month

FY	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	March	April	May	June	Total Licenses Issued
25	2,858	3,110	1,993	1,733	1,644	1,938	2,060	1,811	1,681	1,838	2,398	4,646	27,710
24	2,785	3,348	1,651	1,856	1,664	1,664	2,228	1,923	1,812	2,123	3,347	2,781	27,082
23	2,923	3,880	2,348	2,211	2,032	1,808	2,688	2,136	2,509	2,121	3,485	2,865	31,006
22	2,962	3,358	1,805	1,972	1,907	1,839	2,534	2,164	2,367	2,117	3,135	3,505	29,665
21	2,815	3,165	2,146	2,308	1,983	1,848	2,628	1,876	2,176	2,126	3,027	3,684	29,782
20	2,687	3,346	1,788	1,708	1,833	1,850	2,292	1,709	1,720	1,781	2,791	3,114	26,619
19	3,139	3,694	2,186	2,364	1,785	1,707	2,436	1,879	1,989	2,331	3,063	3,496	30,069
18	2,962	3,799	2,165	3,059	1,922	1,558	2,879	2,110	2,476	2,700	3,216	3,380	32,226
17	2,660	3,221	2,002	1,926	1,482	1,636	2,273	1,744	2,502	2,007	2,959	3,035	27,447
16	3,017	3,432	2,078	2,454	1,603	1,991	2,082	2,267	2,034	2,147	2,783	3,195	29,083
15	3,095	3,564	2,297	2,368	1,452	2,230	1,918	1,717	2,003	1,946	2,505	3,224	28,319

Table 6: Licenses Issued by Fiscal Year and Type

ID	License Title	FY25	FY24	FY23	FY22	FY21	FY20	FY19	FY18	FY17	FY16	FY15
10	Initial License	2,874	2,870	2,443	2,846	2,556	2,311	2,527	2,791	2,679	3,028	3,342
12	One-Year Conditional	17	17	23	15	20	16	13	10	40	36	34
14	International Exchange License	13	12	12	13		18	8	11	23	26	28
15	Standard License	5,888	5,740	5,443	5,355	5,735	5,702	6,237	6,005	5,885	6,017	5,927
18	License Suspended or Revoked	27	31	28	44	24	46	40	45	58	92	489
20	Master Educator License	4,860	4,812	4,243	4,142	4,199	3,991	4,369	4,371	3,866	3,656	3,398
24	Initial Administrator License	345	349	361	291	324	313	259	239	284	251	273
25	Professional Administrator License	694	853	713	573	579	719	730	589	454	484	597
27	Authorization Extension	0	0	39		5	5	36	14	25	21	3
28	Executive Director Decision	374	393	404	320	138	278	142	120	283	319	228
30	Class A License	10	3	3	7	11	70	698	740	1,387	1,168	1,051
31	Administrator Exchange License	4	2	14	36	66	62	91	93	106	65	83

ID	License Title	FY25	FY24	FY23	FY22	FY21	FY20	FY19	FY18	FY17	FY16	FY15
33	Class G	39	44	48	49	14	33	31	21	35	28	39
34	Teacher Intern License	104	111	112	67	69	37	48	48	44	36	34
35	Class B License	889	960	950	927	787	911	887	860	945	1170	1405
36	Class E Emergency License (Extension of B)	91	108	115	93	70	107	108	85	152	130	167
37	Class E Emergency License (Extension of A)	1	3	51	7	3	10	46	40	84	67	108
38	Regional Exchange License	0	0	14	92	143	213	259	403	450	599	517
40	Substitute License	959	1,106	1,058	1,058	1,009	1,213	1,411	1,544	1,403	1,499	1,489
41	Evaluator-(NEW) License	40	34	40	38	33	33	40	58	58	39	37
47	iJAG Authorization	60	44	41	56	27	14	9	10	9	9	19
48	Military Exchange License	0	0	1	9	10	14	12	29	36	41	23
49	Activities Administration Authorization	35	15	22	30	17	15	15	13	6	7	18
50	Initial Career and Technical Authorization	174	123	121	111	76	47	31	49	40	21	17

ID	License Title	FY25	FY24	FY23	FY22	FY21	FY20	FY19	FY18	FY17	FY16	FY15
52	Preliminary Native Language Teaching Authorization	6	11	11	14	9	7	8	8	6	2	11
53	Initial School Administrative Manager Authorization	9	4	5	13	19	14	27	16	28	29	17
54	School Administrative Manager Authorization	1	9	5	7	8	12	6	6	3	2	
55	Career and Technical Authorization	45	35	27	19	23	14	22	17	14	6	9
56	Native Language Teaching Authorization	9	20	14	11	9	3	6	7	10	3	2
59	Transitional Coaching Authorization	73	76	75	72	40	69	40	61	67		
76	Initial Professional Service License	107	114	121	127	153	123	117	135	126	128	112
77	Professional Service License	328	315	306	243	332	276	283	265	232	244	254
79	Orientation and Mobility Specialist	2	3	4	5	3	4	4	1	5	3	2
89	Statement of Professional Recognition	352	396	334	476	329	294	220	395	425	215	249
90	Coaching Authorization	4,489	3,901	3,462	3,255	3,180	3,188	2,927	3,227	3,137	3,464	3,325
91	Coaching Authorization Extension	132	253	326	264	188	274	181	117	145	42	59

ID	License Title	FY25	FY24	FY23	FY22	FY21	FY20	FY19	FY18	FY17	FY16	FY15
92	Behind the Wheel Driving Instructor Authorization	184	191	200	141	126	158	188	133	185	171	173
93	Paraeducator Certificate	577	673	755	420	580	579	622	551	591	643	705
94	Substitute Authorization	2,897	2,803	2,310	2,501	2,980	936	1,432	1,519	1,354	1,375	1,201
95	School Business Official Authorization	165	120	64	160	141	26	207	127	38	110	255
96	Temporary Initial School Business Official Authorization	10	7	8	2	7	4	3	1	5	2	4
97	Initial School Business Official Authorization	22	32	28	30	25	30	23	17	17	30	18
	Temporary Initial License	N/A	N/A	N/A	96	156						
	Initial Content Specialist Authorization	15	16	12								
	Temporary Work-Based Learning Supervisor Authorization	2	1	2								
	Work-Based Learning Supervisor Authorization	145	11	3								
	Extensions of Existing Licenses	548	669	846	624	629						
	Totals	27,432	26,859	25,217	24,659	25,459	22,135	24,366	26,812	24,743	25,287	25,727

December 1, 2025

Home Base Iowa: Licensed Professions and Occupations Educator Licensure Annual Legislative Report



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Background of Military Exchange Licenses

This report was prepared and submitted by the Iowa Department of Education, Bureau of Educational Examiners, pursuant to the following statute:

Iowa Code section 272C.12A - Licensure of Military Spouses and Veterans

5. A licensing board, agency, or department shall annually file a report with the governor and the general assembly providing information and statistics on licenses and temporary licenses issued under this section and information and statistics on credit received by individuals for education, training, and service pursuant to subsection 4.

The 2025 data shows 43 military applicants received benefits. These applicants qualified for a regular Iowa teaching license based on their teacher preparation program. The processing fee for a license (\$85) is waived for all military family applicants.

Veterans

Seventeen veterans received benefits toward getting their Iowa teaching licenses in 2025.

Veterans Receiving Benefits in 2025

Status	License	Folder Number
Veteran	Initial	1136727
Veteran	Master	1021759
Veteran	Master	1141609
Veteran	Initial	1122397
Veteran	Standard	1141972
Veteran	Master	1131356
Veteran	Standard	1143221
Veteran	Standard	300045
Veteran	Standard	1144461

Status	License	Folder Number
Veteran	Master	1144579
Veteran	Initial	1145206
Veteran	Initial	1144308
Veteran	Standard	1141300
Veteran	Initial	1146006
Veteran	Master	1146095
Veteran	Master	1146161
Veteran	Standard	1140539

Military Spouses

Twenty-six military spouses received benefits toward getting their Iowa teaching licenses in 2025.

Military Spouses Receiving Benefits in 2025

Status	License	Folder Number
Spouse	Standard	1028657
Spouse	Initial	1137909
Spouse	Initial	1140466
Spouse	Initial	1141037
Spouse	Master	1141702
Spouse	Standard	1141748

Status	License	Folder Number
Spouse	Master	1141942
Spouse	Initial	1139986
Spouse	Standard	1142273
Spouse	Master	1110324
Spouse	Standard	1142464
Spouse	Initial	1142763
Spouse	Standard	1143161
Spouse	Initial	1127373
Spouse	Initial	1108594
Spouse	Standard	1143690
Spouse	Initial	1143932
Spouse	Standard	1104412
Spouse	Initial	1133506
Spouse	Standard	1145000
Spouse	Standard	1145270
Spouse	Standard	1145474
Spouse	Standard	1145901
Spouse	Standard	1106342

Status	License	Folder Number
Spouse	Initial	1146253
Spouse	Initial	1147784