

SUPREME COURT OF IOWA

Lewis Central Education Ass'n v. Iowa Board of Educational
Examiners

625 N.W.2d 687 (Iowa 2001) · No. No. 98-2272 · Decided April 25, 2001

SUMMARY

The Iowa Supreme Court held that the Iowa Board of Educational Examiners' refusal to find probable cause and initiate disciplinary proceedings was subject to judicial review under Iowa's Administrative Procedure Act. The court reversed and remanded for the board to provide a sufficiently specific statement of reasons explaining its interpretation and application of the probable-cause requirement.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Larson, Justice
JURISDICTION	Iowa
DECIDED	April 25, 2001
DOCKET	No. 98-2272
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The association sought judicial review under Iowa Code chapter 17A of the Iowa Board of Educational Examiners' decision rejecting its disciplinary complaint for lack of probable cause. The district court dismissed the petition on the ground that the board's no-probable-cause decision was not subject to judicial review.
STANDARD OF REVIEW	A ruling on a motion to dismiss is reviewed for correction of errors at law. The agency's action is reviewed under Iowa Code section 17A.19 to determine whether it was arbitrary or capricious and otherwise legally reviewable.
PRECEDENTIAL VALUE	Published, precedential decision of the Supreme Court of Iowa
PARTIES	Lewis Central Education Association v. Iowa Board of Educational Examiners

TOPICS

judicial review of agency action

administrative procedure act

agency adjudication

administrative law

appellate procedure

PRACTICE AREAS

administrative law

appellate procedure

statutory interpretation

judicial review

QUESTIONS PRESENTED

1. Whether the Iowa Board of Educational Examiners' decision refusing to proceed with a disciplinary complaint for lack of probable cause was subject to judicial review under Iowa Code chapter 17A.
2. Whether the board's conclusory statement that the evidence was insufficient to establish probable cause satisfied the requirement that it provide a statement specifying the reasons for rejecting the complaint.

HOLDINGS

1. The board's refusal to act on the complaint and failure to order a contested-case hearing constituted agency action subject to judicial review under Iowa Code chapter 17A.
2. The board's conclusory statement that the evidence was insufficient to constitute probable cause was inadequate. The board must provide a statement of reasons sufficiently specific to explain its interpretation of probable cause and how it applied that standard to the facts found during its investigation.

KEY QUOTATIONS

"We hold the board's refusal to act is judicially reviewable." (at 692)

"We hold the board's conclusory statement, that the evidence is insufficient to constitute probable cause, is inadequate to allow a court to discern the board's interpretation of probable cause or whether, in applying that test, the board acted arbitrarily or capriciously." (at 694)

"Under the Iowa act, there is clearly no room for a presumption of unreviewability; any exception under our act must be express and specifically name the act." (at 691)

FACTUAL BACKGROUND

Lewis Central Education Association, the recognized professional organization for nonsupervisory licensed employees of the Lewis Central Community School District, filed a complaint with the Iowa Board of Educational Examiners against principal Sharon Collins. The board investigated and issued an order rejecting the complaint because the evidence was insufficient to constitute probable cause for setting the matter for hearing. The board's order provided only that conclusory explanation and did not define the probable-cause standard or identify the facts supporting its decision.

PROCEDURAL HISTORY

The association filed a complaint with the board against Lewis Central principal Sharon Collins. After an investigation, the board rejected the complaint because it found insufficient evidence to establish probable cause.

The Polk County District Court dismissed the association's petition for judicial review, and the Supreme Court of Iowa reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The district court was directed to order the board to furnish a statement of reasons sufficient to explain its interpretation of the probable-cause requirement and its application of that requirement to the facts determined by its investigation. The district court was then to determine whether the board acted arbitrarily or capriciously; if not, the matter would end subject to appeal, and if so, the court was to reverse and remand to the agency for further proceedings.

CASES CITED

- Haupt v. Miller, 514 N.W.2d 905, 907 (Iowa 1994)
- Heckler v. Chaney, 470 U.S. 821, 823-34 (1985)
- Chaney v. Heckler, 718 F.2d 1174, 1188 (D.C. Cir. 1983)
- Center for Auto Safety v. Dole, 828 F.2d 799, 815 (D.C. Cir. 1987)
- Polk County v. Iowa State Appeal Board, 330 N.W.2d 267, 276 (Iowa 1983)
- Dunlop v. Bachowski, 421 U.S. 560, 563-66, 571, 578-88 (1975)
- DeVito v. Shultz, 300 F. Supp. 381, 383 (D.C. 1969)