

**Small Business Regulatory Fairness Board
Small Business Impact Statement**

Date: June 3, 2016

Rule Number(s): 5 CSR100-200.035 Missouri Interpreters Certification System **
5 CSR 100-200.170 Skill Level Standards**

**Rule 100-200.035 adds Learner's Permit to the list of Certifications issued by Missouri Commission for the Deaf and Hard of Hearing (MCDHH). Rule 100-200.170 adds both the Learner's Permit and Certified Deaf Interpreter certifications to the Missouri Interpreter Certification System (MICS), specifying the work settings, requirements, and duties.

Name of Agency Preparing Statement: Missouri Commission for the Deaf & Hard of Hearing (MCDHH)

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Name of Person Approving Statement: Opeoluwa Sotonwa

From Scott George's email dated 5/27/16:

One rule references taking a Texas exam could be a typo. One may require Missourians to travel to Texas. This could be an impact to their small business employers

Do any of these three rules cause an impact to for-profit small businesses or their employees? If so, please specify how, in a Small Business Impact Statement, you included representatives of affected small businesses in promulgating these rules. Note that the professional association is not a small business. However, it is an excellent resource to identify from their members.

Two rules (5 CSR 100-200.035, 5 CSR 100-200.170 adding the Provisional/License and professional levels may have an impact; or, actually be a benefit.

Do any of these three rules cause an impact to for-profit small businesses or their employees?

Please describe the methods your agency considered or used to reduce the impact on small businesses (examples: consolidation, simplification, differing compliance, differing reporting requirements, less stringent deadlines, performance rather than design standards, exemption, or any other mitigating technique).

This rule addition will be beneficial to those who have failed in our regular testing process, providing them an opportunity to practice under the supervision of another certified and licensed interpreter. There is a small increase in the paperwork required of individual interpreters seeking a Learner's Permit (LP) certification, as they must document their supervised work to increase skills. There is no financial impact anticipated on the supervisors – relationships between LP certificate-seekers and their supervisors must be worked out on an individual basis. The only impact on supervisors is the need to sign a log verifying their supervision.

We are not aware of any impact on small businesses due to this change in an existing rule. No compliance, deadline, performance, or exemption for small business has changed as a result of this wording adjustment.

Please explain how your agency has involved small businesses in the development of the proposed rule.

The Missouri Commission for the Deaf and Hard of Hearing (MCDHH) has direct involvement of concerned Missourians on our Commission and our Board for Certification of Interpreters (BCI). In addition, all rule changes were discussed publically at Commission meetings, with input from the public, some of whom are Interpreters and owners of Interpreting Agencies. The proposed changes were actually suggested by interpreter professionals who expressed concern about the lack of opportunity for aspiring interpreters to get the hand-on training that could help them realize their dreams. No impact for either group was identified.

Please list the probable monetary costs and benefits to your agency and any other agencies affected. Please include the estimated total amount your agency expects to collect from additionally imposed fees and how the moneys will be used.

No fees are collected and no agencies affected by this change. If there are financial agreements between LP seekers and their supervisors, this will occur on an individual basis. Our agency will collect no additional fees for maintaining the records of those seeking Learner's Permit certification.

Please describe small businesses that will be required to comply with the proposed rule and how they may be adversely affected.

No small businesses will be required to comply with the proposed rule change

Please list direct and indirect costs (in dollars amounts) associated with compliance.

There are no direct or indirect costs associated with compliance. Working with an LP certification will allow prospective interpreters to gain skills and experience beneficial to their future careers. Once they have failed to pass our BEI Basic Performance Test, they can apply for LP certification and locate a supervisor. There is no cost to apply for LP certification.

Please list the types of businesses that will be directly affected by, bear the cost of, or directly benefit from the proposed rule.

No businesses will be directly affected by, bear the cost of, or directly benefit from this proposed rule amendment.

Does the proposed rule include provisions that are more stringent than those mandated by comparable or related federal, state, or county standards?

Yes___ No_X__

If yes, please explain the reason for imposing a more stringent standard.

For further guidance in the completion of this statement, please see 536.300 RSMo.