

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

Date: June 3, 2016

Rule Number: 5 CSR100-200.095 Certified Deaf Interpreter Certification**

**This is a new rule, added to allow the Missouri Commission for the Deaf and Hard of Hearing (MCDHH) to grant Certified Deaf Interpreter certification:

PURPOSE: This rule outlines how individuals may be granted a Certified Deaf Interpreter Certification

Certification as a Certified Deaf Interpreter (MO-CDI) may be obtained only by conversion pursuant to rule 5 CSR 100-200.100 by an applicant who receives a passing score in any of the following tests administered by the Texas Department of Assistive and Rehabilitative Services:

- (A) Level III Intermediary;
- (B) Level IV Intermediary; or
- (C) Level V Intermediary.

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

Name of Person Preparing Statement: Opeoluwa Sotonwa

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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 new rule creates a pathway to conversion for a Certified Deaf Interpreter (CDI) as defined by Texas' Department of Assistive and Rehabilitative Services (DARS). Nationally, there is great need for CDI interpreters, who are deaf and provide sign language interpretation services.

Missouri currently utilizes the DARS-developed Board for Evaluation of Interpreters (BEI) test as our system for evaluating hearing sign language interpreters. This rule allows us to accept BEI-certified CDI interpreters by conversion, as Missouri does not currently provide CDI certification.

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 hands-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.

MCDHH will collect the same fees for CDI conversion as it currently collects for all other levels of interpreters. It is anticipated that the numbers of conversion of CDIs will be very low. With a fee of \$50.00 fee (plus \$10.00 application fee) per conversion, we anticipate a maximum of four (4) CDI conversions per year, for a total of \$240 per year. This money will be used in our Missouri Interpreter Certification System (MICS), with no increase in staff anticipated.

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. Individual CDI candidates will be required to submit required paperwork and pay \$60 for conversion.

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

We do not anticipate additional indirect costs to applicants. The total direct cost for compliance is estimated to be \$60 per conversion applicant. As Missouri does not currently have a CDI testing system in place, it is necessary for all applicants for Missouri certification to have received their CDI certification elsewhere. Missouri currently provides BEI certification for three levels of interpreters.

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.